



EMPOWER AND EXPAND GIG ECONOMY IN INDONESIA

2021 Laporan Tahunan dan
Laporan Keberlanjutan
Annual Report and
Sustainability Report



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Laporan tahunan ini memuat kata "Bank Raya" dan "Bank" yang didefinisikan sebagai PT Bank Raya Indonesia Tbk. yang menjalankan kegiatan usaha di bidang jasa perbankan. Penyebutan satuan mata uang "Rupiah", "Rp" atau "IDR" merujuk pada mata uang resmi Republik Indonesia, sedangkan "Dolar AS" atau "USD" merujuk pada mata uang resmi Amerika Serikat. Semua informasi keuangan disajikan dalam mata uang Rupiah.

Welcome to PT Bank Raya Indonesia Tbk's Joint Annual Report and Sustainability Report on the topic "Empower and Expand Gig Economy in Indonesia". This Annual Report is issued in line with Financial Services Authority Regulation 29/POJK.04/2016 on Issuers' or Public Companies' Annual Reports and Financial Services Authority Regulation 51/POJK.03/2017 on Issuers' and Public Companies' Sustainable Finance Implementation. The Financial Services Authority's Circular Letter 9/SE0JK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports, Circular Letter 16/SE0JK.04/2021 concerning the Form and Content of Annual Reports Issuers or Public Companies, and Financial Services Authority Regulation 51/POJK.03/2017 concerning the This Joint Annual Report may contain several forward-looking statements that reflect the Bank's outlook on future financial events and performance, as well as its financial condition, results of operations, economic conditions, sector conditions, and traffic conditions, as well as related plans and objectives.

These views are based on certain current estimates and assumptions that are subject to change as a result of uncertainties, contingencies, and various business, economic, and competitive risks that may change from time to time; may result in actual results, performance, and events materially differing from those predicted or projected; and are beyond the control of the Bank and its Board of Directors. These statements are not based on historical facts and do not constitute a representation of the Bank's objectives, plans, expectations, assumptions, or beliefs about future events. There is no certainty that future events will transpire as anticipated, that estimates will be met, or that the Bank's assumptions will be right. These comments are not intended to be and should not be construed as predictions of the Bank's future performance.

This annual report incorporates the terms "Bank Raya" and "Bank," which refer to PT Bank Raya Indonesia Tbk., which engages in banking services business. The currency unit "Rupiah", "Rp", or "IDR" refers to the official currency of the Republic of Indonesia, while the currency unit "US Dollar", "USD", refers to the official currency of the United States of America. All financial data is shown in Rupiah.



EMPOWER AND EXPAND GIG ECONOMY IN INDONESIA

BRI Agro bertransformasi menjadi Bank Raya di tahun 2021. Transformasi ini bukan hanya sekedar mengubah nama, tapi juga model bisnis Bank mengalami perubahan yang sangat signifikan. Di tengah era disrupsi teknologi, Bank Raya sebagai *digital attacker* masuk ke ekosistem digital mewakili BRI Group.

Bank telah mencanangkan aspirasi baru yaitu **"The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy"**. Bank Raya berkomitmen untuk membangun pondasi keuangan yang kuat untuk model bisnis yang baru dan fokus untuk menyalurkan pendanaan berbasis digital kepada segmen market yang baru, terutama segmen *Gig Economy* yang juga tengah mengalami pertumbuhan yang sangat pesat di Indonesia.

Bank Raya sebagai *digital attackers* bertekad untuk menjadikan segmen yang masih *"underbank"* sebagai target pasar utama melalui solusi praktis yang akan membuat kebutuhan perbankan menjadi lebih mudah. Bank Raya berkomitmen untuk meningkatkan infrastruktur digital untuk mendukung pemberdayaan dan pertumbuhan *gig economy* di Indonesia.

Bank Raya menginisiasi *Community Branch*, terutama untuk melayani komunitas ekonomi sektor informal (*gig economy*) dan agen-agen *fintech* di beberapa area untuk membangun infrastruktur digital bagi sektor *gig economy* dengan melalui *customer experience* yang koheren.

In 2021, BRI Agro will be renamed Bank Raya. Not only does this transition involve a name change, but it also involves a fundamental shift in the Bank's business strategy. Technology has changed the world and Bank Raya is now part of it as a digital attacker for the BRI Group.

The Bank has announced a new aspiration: **"The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy."** Bank Raya is devoted to establishing a convincing financial basis for a new business model and is concentrating its determination on channelling digital-based finance to new market sectors, particularly the *Gig Economy*, which is booming in Indonesia.

Bank Raya, as digital attackers, is committed to making the *"underbank"* group its primary target market with practical solutions that simplify banking exigencies. Bank Raya is committed to enhancing digital infrastructure in order to facilitate the empowerment and expansion of Indonesia's *gig economy*.

Bank Raya set up *Community Branches* to serve the informal economy (*gig economy*) and fintech agents in a wide range of industries. The goal is to build digital infrastructure for the *gig economy* sector through a consistent customer experience.

/ Tema Laporan Tahunan Sebelumnya Previous Annual Report Theme

2017



Peningkatan Layanan Melalui Transformasi Digital
Service Improvement Through Digital Transformation

2018



Menuju Bank Digital Terbaik Untuk Agribisnis
Toward The Best Digital Bank for Agribusiness

BRI Agro menjadikan tahun 2017 sebagai momen penting Perseroan untuk meletakkan landasan infrastruktur teknologi informasi dengan melakukan Transformasi Menuju Layanan Digital yang di tahun 2017 telah meluncurkan *Mobile Banking* dan *Cash Management System*.

BRI Agro marked 2017 as a momentum for the Company to place information technology infrastructure foundation towards Digital Service where in 2017, Bank has launched *Mobile Banking* and *Cash Management System*.

Mobilitas dan kebutuhan nasabah yang terus berkembang dengan pesat mendorong kami untuk berinovasi memberikan solusi komprehensif dan menyediakan layanan efisien dalam setiap tahapan kegiatan pembiayaan agribisnis, baik *on farm* maupun *off farm*. Di tahun 2018, BRI Agro membukukan laba senilai Rp204 miliar per kuartal IV 2018. Laba ini tumbuh signifikan 45,35% dibandingkan periode yang sama tahun lalu.

The progressing of customers' mobility and demands propels us to innovate in offering them comprehensive banking solutions, providing efficient services to all customers in each stage of their agribusiness financing activities, either *on farm* or *off farm*. In 2018, BRI Agro noted the profit to IDR 204 billion per quarter IV of 2018. The profit was significantly increasing 45.35% compared to the same period on the previous year.

2019



Komitmen Pertumbuhan Di Masa Depan

Commitment to Pursuing Growth
in the Future

2020



Berkolaborasi Secara Digital Melalui Inovasi

Collaborating Digitally Through
Innovation

Di tahun 2019, BRI Agro melakukan inovasi untuk menyempurnakan produk dan layanan yang ditawarkan, serta meluncurkan produk dan layanan baru yaitu PINANG pada bulan Februari 2019 yang sesuai dengan kebutuhan nasabah. Berbagai hal yang dilakukan merupakan salah satu wujud komitmen BRI Agro untuk terus meraih pertumbuhan yang berkelanjutan di masa depan, sekaligus untuk mewujudkan visi "Menjadi bank dengan layanan terbaik dan fokus di sektor Agribisnis".

In 2019, BRI Agro's innovations encompassed the refinement of product and services, as well as launching of new product and services i.e PINANG on February 2019 according to customer demands. The wide ranges of offers served as one of BRI Agro commitments to continually achieve sustainable growth in the future, while realizing its vision to be the best service excellence bank and focus on Agribusiness sector.

Pada tahun 2020, BRI Agro telah melakukan langkah transformasi digital. Strategi tersebut dinilai sudah sangat tepat, terutama dalam menghadapi era digitalisasi, BRI Agro mampu beradaptasi dan menerapkan strategi yang relevan sesuai perkembangan terkini. Hal ini dilakukan dengan memperkuat layanan *digital banking* melalui penyaluran pinjaman digital oleh PINANG, pengembangan produk dan layanan baru yang akan mendukung transaksi digital, *partnership* dengan *Fintech* untuk meningkatkan penetrasi pasar, serta memperbaiki kualitas kredit dan mengupayakan pertumbuhan pendapatan. BRI Agro berupaya untuk terus mencatat kinerja yang baik, melalui pencapaian kinerja keuangan dan respon Perseroan terhadap bisnis dan ekonomi yang dinamis.

BRI Agro has carried out digital transformation during 2020. The strategy is considered appropriate, especially in addressing the current digital era, BRI Agro was able to adapt and implement relevant strategies to meet the latest development. This is done by strengthening digital banking services through strong growth of PINANG, new product and services to support digital transactions, partnership with *Fintech* to increase market penetration, and improving credit quality including profitability growth. BRI Agro strives to deliver good performance, through the achievements of financial results and the Bank's responds to the dynamics business and economy.

/ Kinerja Unggul 2021

2021 Key Performance



Pendapatan Bunga
Interest income

Rp1.647 Miliar
Billion



Oversubscribe Right Issue

38.5%



Rasio CASA
CASA Ratio

37.59%

Rasio CASA/CASA Ratio 2020 : 23.85%



Kredit Digital
Digital Credit

Rp487.998 Juta
Million



Modal Inti
Core Capital

Modal Inti telah memenuhi ketentuan OJK yaitu lebih dari Rp2 Triliun pada 2021 sebesar Rp2.083 miliar

Core Capital has complied with OJK regulations, which is more than IDR 2 trillion in 2021, amounting to IDR 2,083 billion



Jumlah Penghargaan
Total of Awards

7



Jumlah Karyawan
Total Employee

881



Survey Kepuasan Masyarakat
Customer Satisfaction Survey

89%

Responden puas dengan Produk
dan Pelayanan
Respondents are satisfied with the
Products and Services



Biaya Dana 2021
Cost of Fund (CoF) 2021

4,08%

Biaya Dana/Cost of Fund (CoF) 2020 : 5,97%



Hasil Penilaian OJK

FSA Assessment Results

Tingkat Kesehatan Bank 2 (Sehat)

Risk Based Bank Rating Composite 2 (Satisfactory)

//

Melalui pengamatan cermat terhadap kondisi makro ekonomi, perubahan lingkungan usaha serta perilaku dan kebutuhan nasabah, **Bank Raya** mampu beradaptasi dan menerapkan strategi yang relevan sesuai perkembangan terkini

Bank Raya is able to adapt and implement relevant strategies in response to recent developments by closely monitoring macroeconomic conditions, changes in the business environment, as well as customer behaviour and needs

//

Pencapaian Penting 2021

Significant Events 2021

16

Januari
January 2021



PKS BRI Agro x TaniHub
PKS BRI Agro x TaniHub

24-25

Januari
January 2021



RAKERNAS 2021
2021 National Work Meeting

18

Februari
February 2021



Employee Care "Donor Darah"
Employee Care "Donor Darah"

07

Maret
March 2021



Penyaluran Kredit kepada Agen PAYFAZZ
PAYFAZZ Distribution

25

Maret
March 2021



Launching Lentera BRI Life
Launching of Lantern BRI Life

09

April
April 2021



RUPST 2021
AGMS 2021

06

Mei
May 2021


PKS BRI Agro x Modalku
PKS BRI Agro x Modalku

19

Mei
May 2021


RAKERNAS Transformasi
Transformation of NATIONAL WORK MEETING

21

Mei
May 2021


PKS BRI Agro x Majoo
PKS BRI Agro x Majoo

29

Mei
May 2021


Bukber & CSR Ramadhan

1. Yayasan Panti Asuhan Yatim Piatu, Sa'adatut Daarain
2. Yayasan Al Hasanat jaya
3. Warga Sekitar
(Paket Sekolah & Santunan) & seluruh Cabang SELINDO

03

Juni
June 2021


Penandatanganan Nota Kesepahaman BRI Agro x Efishery
Signing of Memorandum of Understanding BRI Agro x Efishery

Fast Breaking & CSR Ramadhan

1. The Orphanage Foundation, Sa'adatut Daarain
2. Al Hasanat Jaya Foundation
3. Locals
(School Package & Benefits) & all SELINDO Branches

15

Juni
June 2021



PKS BRI Agro x Kedai Sayur, iGrow, Telkom, Link Aja
PKS BRI Agro x Kedai Sayur, iGrow, Telkom, Link Aja

18

Juni
June 2021



PKS BRI Agro x Koinworks
PKS BRI Agro x Koinworks

13

Agustus
August 2021



CEO Message
CEO Message

26

Agustus
August 2021



PKS BRI Agro x Ray White
PKS BRI Agro x Ray White

28

September
September 2021



HUT BRI Agro ke 32
BRI Agro's 32nd Anniversary

28

September
September 2021



RUPSLB
EGMS

06

Oktober
October 2021



PKS BRI Agro x iGrow
PKS BRI Agro x iGrow

08

Oktober
October 2021



Peluncuran Dana Talangan "Pinang Paylater"
Launching of the "Pinang Paylater" bailout fund

01

November
November 2021



Perubahan nama Perseroan
Perubahan Logo BRI Agro menjadi Raya berdasarkan surat Otoritas Jasa Keuangan (OJK) No S-426/PB.12/2021 Tanggal 05 November 2021 Perihal Keputusan Penetapan Penggunaan Izin Usaha PT Bank Rakyat Indonesia Agroniaga Tbk.

Perubahan nama Perseroan menjadi
PT Bank Raya Indonesia Tbk.

Change in the company's name
The BRI Agro logo has been changed to Raya in accordance with the Financial Services Authority's (OJK) letter No. S-426/PB.12/2021 dated November 5, 2021 about the decision to determine the usage of PT Bank Rakyat Indonesia Agroniaga Tbk's business licence.

The Company's name has been changed to
PT Bank Raya Indonesia Tbk.

09

November
November 2021



Perubahan Logo BRI Agro menjadi Raya berdasarkan surat Otoritas Jasa Keuangan (OJK) No S-250/PB.31/2021 Tanggal 09 November 2021 Perihal Persetujuan Rencana Perubahan Logo Bank,

Perubahan logo telah resmi berubah dari BRI Agro menjadi Bank Raya.

BRI Agro's logo was changed to Raya in accordance with the Financial Services Authority's (OJK) letter No. S-250/PB.31/2021. Dated November 9, 2021, Relating to the Approval of the Bank's Plan to Change Its Logo,

Bank Raya's logo has been officially changed from BRI Agro.

15

November
November

2021



Pembukaan Community Branch (CB) Cirebon
Opening of Community Branch (CB) Cirebon

18

November
November

2021

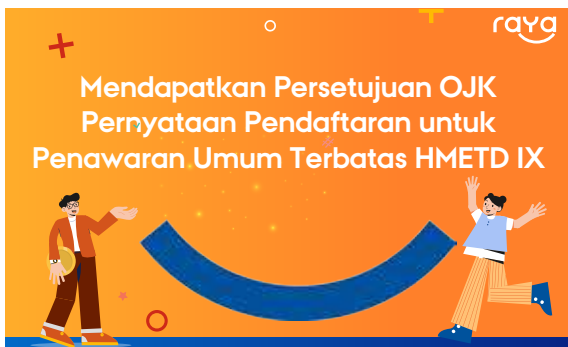


PKS Raya x Si Cepat
PKS Raya x Si Cepat

18

November
November

2021



Pelaksanaan *Right Issue* Bank Raya
Implementation of the *Right Issue* of Bank Raya

26

November
November

2021



Penandatanganan Nota Kesepahaman Raya x PT Widodo Makmur Perkasa Tbk.
Raya and PT Widodo Makmur Perkasa Tbk sign a Memorandum of Understanding.

03
Desember 2021
December


Hasil lolos "Indonesia Industry 4.0 Readiness Index 4.0" (INDI 4.0). Proses yang diikuti oleh Bank Raya untuk Industri yang telah bertransformasi ke Era Industri 4.0,

The results achieved a score of 4.0 on the "Indonesia Industry 4.0 Readiness Index" (INDI 4.0). Bank Raya for Industry's transformation towards the Industrial Era 4.0

13
Desember 2021
December


Pra RAKERNAS
Pre-NATIONAL WORK MEETING

24
Desember 2021
December


CSR Program Desa Digital & Bantuan Pendidikan, Buku Paket di SMK Pertanian Paedah Kencana. Desa Bulakan, Kecamatan Gunung Kencana, Kabupaten Lebak - Banten.

Package Books at the Paedah Kencana Agricultural Vocational School as part of the CSR Digital Village Program and Education Assistance. Bulakan Village is located in the Gunung Kencana District of the Lebak Regency in Banten.

/ **Perubahan Nama Bank** (GRI 102-10)(C.6) **Change of Bank Name** (GRI 102-10)(C.6)



PT Bank BRI Agroniaga Tbk (AGRO) mengukuhkan diri bertransformasi menjadi bank digital dan mengubah identitas Bank menjadi PT Bank Raya Indonesia Tbk. Perubahan identitas Bank ini merupakan perwujudan grand strategy BRI sebagai induk perusahaan, yang sedang melakukan transformasi dan menunjuk Bank Raya sebagai digital attacker dari BRI Group. Sehingga, pergantian nama ini merupakan komitmen BRI Group agar Bank dapat beroperasi sebagai bank digital dalam memenangkan persaingan di era digital.

Bank Raya berupaya memberikan kemudahan transaksi bagi nasabah. Kami berubah menjadi lebih inklusif dan merayakan lebih banyak hal baik, untuk menjadi bank digital terbaik dengan titik akses terbesar dengan menjadi *House of Fintech and Home for Gig Economy*.

PT Bank BRI Agroniaga Tbk (AGRO) acknowledged its transformation into a digital bank and rebranded as PT Bank Raya Indonesia Tbk. This modification of the Bank's identity reflects BRI's broad vision as the parent business, which is undergoing transformation and designating Bank Raya as the BRI Group's digital adversary. Thus, this name change demonstrates the BRI Group's commitment to the Bank's ability to compete as a digital bank in the digital era.

Bank Raya attempts to make transactions as convenient as possible for its clients. We're evolving to be more inclusive and to celebrate more wonderful things; we're positioning ourselves to be the finest digital bank with the broadest reach by establishing the House of Fintech and Home for the Gig Economy.

Visi dan Misi (GRI 102-16)(C.1)

Vision and Mission (GRI 102-16)(C.1)



Visi Vision

The Best Digital Bank by Becoming House of Fintech and Home for Gig Economy.



Misi Mission

1. Menyediakan produk dan layanan yang relevan dengan kebutuhan nasabah (*Gig Economy & Fintech*) melalui pendekatan digital *end-to-end* secara menyeluruh.
 2. Memastikan layanan perbankan digital yang aman dan handal.
 3. Membangun Ekosistem Bisnis untuk membantu nasabah (*Gig Economy & Fintech*) mengembangkan bisnisnya.
 4. Pengembangan & implementasi produk yang *agile*.
 5. Mengutamakan *Good Corporate Governance* (GCG) dalam pengembangan bisnis dan operasional.
-
1. By using a complete end-to-end digital strategy, providing goods and services that are relevant to client demands (*Gig Economy & Fintech*).
 2. Ensuring the security and reliability of digital financial services.
 3. Creating a Business Ecosystem to assist clients in growing their businesses (*Gig Economy & Fintech*).
 4. Product development and implementation using an agile methodology.
 5. Giving Good Corporate Governance (GCG) a high priority in business growth and operations.

Review Atas Visi dan Misi Perusahaan

Visi tersebut diatas dijabarkan sebagai upaya untuk mewujudkan:

- Bank Raya menjadi bank dengan layanan digital terbaik
- Bank Raya fokus dan menjadi Bank acuan bagi nasabah pelaku *gig economy* termasuk UMKM.

Untuk mewujudkan Visi yang ingin dicapai maka langkah-langkah yang akan dilakukan oleh Bank Raya antara lain terangkum dalam lima misi sebagai berikut :

Misi Pertama:

"Menyediakan produk dan layanan yang relevan dengan kebutuhan nasabah (*Gig Economy & Fintech*) melalui pendekatan digital *end-to-end* secara menyeluruh". Kata kunci dalam misi pertama adalah sebagai berikut :

Relevan

Yang dimaksud relevan adalah penyediaan produk dan layanan digital yang memiliki nilai guna secara langsung bagi nasabah dan dapat menyesuaikan kebutuhan nasabah dalam perkembangan teknologi digital.

Gig Economy

Yang dimaksud *Gig economy* dalam misi ini adalah para pekerja kontrak jangka pendek atau pekerja lepas maupun pekerja sektor non formal yang melaksanakan pekerjaan *skilled worker* atau *unskilled worker* yang mencakup segmen masyarakat *underbanked* (mikro) sampai dengan *mass affluent* (ritel).

Digital end-to-end

Bank Raya selalu berinovasi untuk menyediakan produk dan layanan dengan proses digital secara menyeluruh dari ujung ke ujung (*end to end*).

Misi Kedua:

"Memastikan layanan perbankan digital yang aman dan andal". Kata kunci dalam misi kedua adalah sebagai berikut:

Aman dan Andai

Yang dimaksud aman adalah penerapan sistem keamanan yang komprehensif dengan tetap menjaga kenyamanan pengalaman nasabah.

A Retrospective Look at the Company's Vision and Mission

The vision outlined above is characterised as an attempt to accomplish the following:

- Bank Raya is the bank that offers the most advanced digital services.
- Bank Raya focuses on and establishes itself as a reference bank for clients engaged in the *gig economy*, particularly micro and small businesses.

To implement the goal, Bank Raya will take the following measures, which are stated in the following five missions:

The Initial Mission:

"By using a complete end-to-end digital strategy, we provide goods and services that are relevant to client demands (*Gig Economy & Fintech*).\" The first mission's keywords are as follows:

Relevant

Relevance is defined as the supply of digital goods and services that have direct utility for consumers and are adaptable to changing customer demands as digital technology evolves.

Gig Economy

The *Gig economy* is defined in this mission as temporary contract employees or casual workers, as well as non-formal sector workers who do skilled or unskilled labour in sectors of society ranging from the *underbanked* (micro) to the mass wealthy (retail).

Digital end-to-end

Bank Raya is always innovating to provide goods and services via an end-to-end digital approach.

Second Mission:

"Providing secure and dependable digital financial services.\" The second mission's keywords are as follows:

Secure and dependable

Safe refers to the deployment of a thorough security system while yet providing a pleasant client experience.

Selanjutnya andal adalah penyediaan layanan yang dapat dipercaya oleh nasabah dalam menunjang kemudahan dan kecepatan dalam menggunakan layanan Bank Raya, bahkan pada saat padat transaksi.

Misi ketiga:

"Membangun Ekosistem Bisnis untuk membantu nasabah (*Gig Economy & Fintech*) mengembangkan bisnisnya". Kata kunci dalam misi yang ketiga adalah:

Ekosistem Bisnis

Ekosistem bisnis adalah sekumpulan perusahaan dengan hubungan yang saling melengkapi dan sinergis yang membangun kemitraan strategis untuk memberikan nilai bagi pengguna akhir atau nasabah.

Misi keempat:

"Pengembangan & implementasi produk yang agile". Kata kunci dalam misi yang keempat adalah:

Agile

Yang dimaksud dengan agile adalah pengembangan sebuah produk untuk mencapai titik terbaiknya dengan perbaikan - perbaikan yang terus dilakukan seiring dengan *feedback* yang diberikan oleh konsumen atau user.

Misi kelima:

"Mengutamakan *Good Corporate Governance* (GCG) dalam pengembangan bisnis dan operasional". Kata kunci dalam misi yang kelima adalah:

Good Corporate Governance (GCG)

Yang dimaksud GCG adalah suatu tata kelola bank yang menerapkan prinsip-prinsip keterbukaan (*transparency*), akuntabilitas (*accountability*), pertanggungjawaban (*responsibility*), independensi (*independency*), dan kewajaran (*fairness*).

Additionally, dependable is the provision of services that consumers can rely on to support the convenience and speed with which they may use Bank Raya services, especially during busy periods.

Third Mission:

"Constructing a Business Ecosystem to assist clients in growing their businesses (*Gig Economy & Fintech*).". The third mission's keywords are as follows:

Ecosystem of Business

A business ecosystem is a group of complementary and synergistic businesses that form strategic alliances to provide value for end users or consumers.

Fourth mission

"Agile product development and implementation" is the fourth mission. The fourth mission's keywords are as follows:

Agile

Agile refers to the process of developing a product to its full potential via continuous improvement in response to customer or user input.

Fifth Mission:

"Development and operations of businesses should place a premium on good corporate governance (GCG).". The fifth mission's keywords are:

Good Corporate Governance (GCG)

GCG refers to bank governance that is guided by the values of openness, accountability, responsibility, independence, and fairness.

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Laporan Keuangan Financial Report

/ BAB 1

IKHTISAR KINERJA PERFORMANCE HIGHLIGHTS





Ikhtisar Kinerja

Performance Highlights

Financial highlights

Financial Position

Dalam jutaan rupiah/in million Rupiah

Uraian Description	2021	2020	2019	2018	2017
Aset Assets					
Kas Cash	15.239	14.075	24.922	19.326	12.106
Giro pada Bank Indonesia Current Accounts with Bank Indonesia	557.507	756.178	1.280.299	1.043.651	759.830
Giro pada bank lain - gross Current Accounts with Other Banks - gross	192.795	332.096	333.190	1.234.712	54.842
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(137)	(381)	-	-	-
Penempatan pada Bank Indonesia dan bank lain - gross Placement at Other Banks and Bank Indonesia - gross	1.374.727	1.516.959	732.580	3.458.423	1.439.860
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	-	(622)	-	-	-
Efek-efek - gross Securities - gross	3.495.512	3.366.821	3.520.204	1.931.293	1.534.289
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(3.654)	(6.080)	-	-	-
Efek-efek yang dibeli dengan janji dijual kembali Securities Purchased Under Agreement to Resell	650.378	3.047.732	2.268.981	-	1.514.734
Tagihan Wesel Ekspor & Tagihan lainnya Export Bills & other Receivables	-	23.745	-	-	-
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	-	(37)	-	-	-
Tagihan derivatif Derivative Receivables	-	-	159	36	-
Kredit yang diberikan - gross Loans Provided - gross	11.608.327	19.491.934	19.366.245	15.670.832	10.981.623
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(1.875.402)	(1.006.365)	(833.720)	(451.113)	(361.118)
Tagihan Akseptasi Acceptances Receivables	92.449	-	-	59.497	55.591
Penyertaan saham Investment in Shares of Stocks	78	298	298	298	298
Aset tetap - neto Fixed Assets - net	290.126	277.438	262.121	259.141	264.127
Aset pajak tangguhan Deferred Tax Assets	371.739	94.379	29.224	40.981	34.100
Agunan yang diambil alih - neto Foreclosed Collaterals - net	6.044	8.289	3.903	3.903	4.353
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(1.613)	(380)	(908)	(200)	(198)
Biaya dibayar dimuka dan aset lain - lain Prepaid Expenses and other assets	92.410	99.413	80.425	42.892	28.156
Total Aset Total Assets	16.866.523	28.015.492	27.067.923	23.313.671	16.322.593

Dalam jutaan rupiah/in million Rupiah

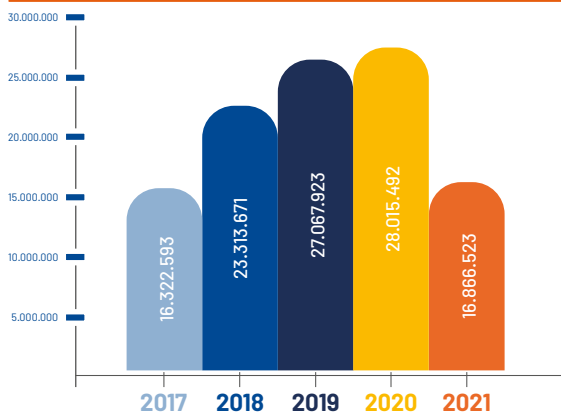
Uraian Description	2021	2020	2019	2018	2017
Liabilitas Liabilities					
Liabilitas segera Current Liabilities	9.926	15.813	11.902	15.892	12.166
Simpanan nasabah Deposits from customer	13.496.292	22.995.279	21.144.601	18.064.536	12.419.279
Simpanan dari bank lain Deposits from other banks	301.307	213.163	744.855	80.561	31.046
Liabilitas derivatif Derivative liabilities	-	-	144	28	-
Liabilitas akseptasi Acceptances liabilities	92.561	-	-	59.497	55.591
Utang pajak Taxes payable	12.652	25.345	22.962	27.926	58.583
Pinjaman Yang Diterima Loans Received	16.517	17.319	-	-	-
Estimasi Kerugian Komitmen & Kontinjensi Estimated Loss of Commitments & Contingencies	28.248	11.079	-	-	-
Surat berharga yang diterbitkan Marketable securities issued	238.863	238.616	499.159	498.537	497.965
Liabilitas diestimasi atas imbalan kerja Estimated liabilities for employee benefits	60.062	46.375	43.146	44.858	42.380
Liabilitas lain - lain Other Liabilities	152.431	164.813	119.450	97.550	94.298
Total Liabilitas Total Liabilities	14.408.859	23.727.802	22.586.219	18.889.385	13.211.308
Ekuitas Equity					
Modal saham Share capital	2.274.653	2.134.329	2.134.329	2.134.329	1.791.049
Tambahan modal disetor Additional paid-in capital	2.943.714	1.827.439	1.825.178	1.825.178	945.142
Opsi saham Shares option	82	16.774	12.575	680	-
Dana setoran modal Capital Paid-in Advance	-	-	-	-	267
Keuntungan (kerugian) yang belum direalisasi atas efek-efek yang tersedia untuk dijual - setelah pajak tangguhan Unrealised gain (loss) on available-for-sale Securities after deferred tax	54.066	69.501	-15.765	-51.904	13.106
Cadangan Kerugian Penurunan Nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya-setelah pajak tangguhan Allowance for Impairment Losses on marketable securities at fair value derived from other comprehensive income—net of deferred tax	87	1.596	-	-	-
Pengukuran kembali program imbalan pasti - setelah pajak tangguhan Remeasurement of Defined Benefit Plan - after deferred tax	(3.603)	3.684	3.993	4.828	1.370

Dalam jutaan rupiah/in million Rupiah

Uraian Description	2021	2020	2019	2018	2017
Saldo Laba Retained Earnings					
Telah ditentukan penggunaannya: The use has been determined:					
Cadangan khusus Specific Reserves	117	117	117	117	117
Cadangan umum General Reserves	32.254	30.691	28.138	17.927	10.903
Belum ditentukan penggunaannya The use has not yet determined	(2.843.706)	203.559	493.139	493.131	349.331
Total Ekuitas Total Equity	2.457.663	4.287.690	4.481.704	4.424.286	3.111.285
Total Liabilitas dan Ekuitas Total Liabilities and Equity	16.866.523	28.015.492	27.067.923	23.313.671	16.322.593

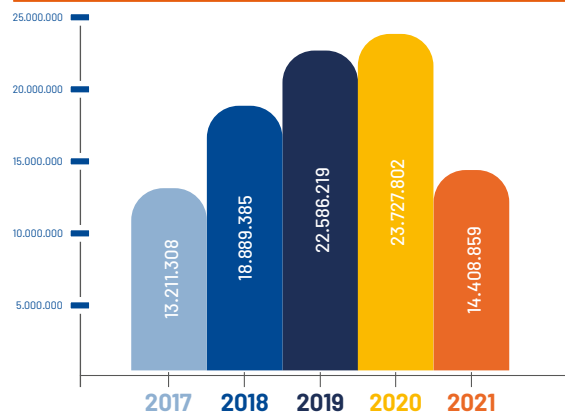
Total Aset Total Assets

dalam jutaan Rupiah | in million Rupiah



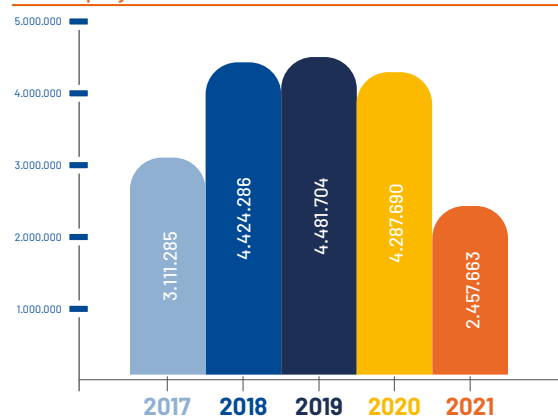
Total Liabilitas Total Liabilities

dalam jutaan Rupiah | in million Rupiah



Total Ekuitas Total Equity

dalam jutaan Rupiah | in million Rupiah



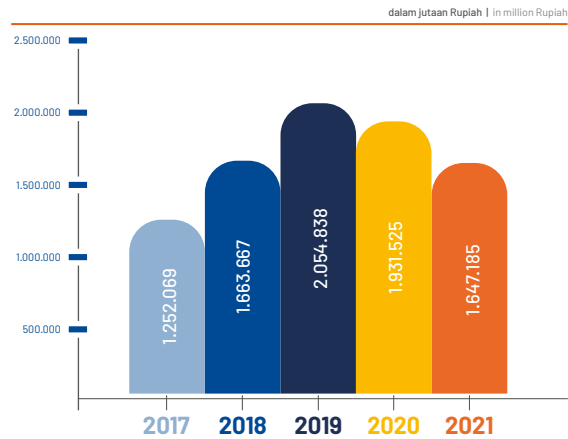
Laba (Rugi) dan Penghasilan Komprehensif Profit or Loss and Comprehensive Income

(GRI 102-7)

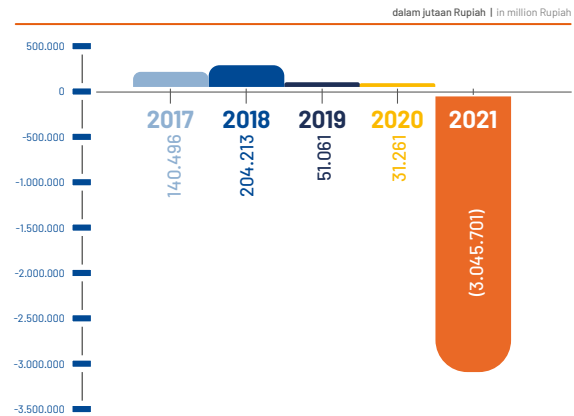
Dalam jutaan rupiah/in million Rupiah

Uraian Description	2021	2020	2019	2018	2017
Pendapatan bunga Interest income	1.647.185	1.931.525	2.054.838	1.663.667	1.252.069
Beban bunga Interest expense	(773.616)	(1.306.889)	(1.361.627)	(987.738)	(748.947)
Pendapatan operasional lainnya Other operating income	110.755	71.348	73.866	51.224	58.095
Penyisihan kerugian penurunan nilai Impairment lossess	(3.885.062)	(322.513)	(383.543)	(154.156)	(141.138)
Beban operasional lainnya Other operating Expenses	(402.737)	(315.820)	(312.040)	(281.303)	(238.413)
Laba operasional Operating income	(3.303.476)	57.650	71.493	291.694	181.666
Pendapatan non operasional - neto Non-operating income - net	345	6.422	2.705	815	11.967
Laba sebelum beban pajak Income before tax expense	(3.303.131)	64.072	74.198	292.509	193.633
Beban pajak Tax expense	257.430	(32.811)	(23.137)	(88.296)	(53.137)
Laba tahun berjalan Income for the year	(3.045.701)	31.261	51.061	204.213	140.496
Yang dapat diatribusikan kepada: Attributed to					
Pemilik entitas induk Owners of the parent entity	(3.045.701)	31.261	51.061	204.213	140.496
Kepentingan non pengendali Non-controlling interest	-	-	-	-	-
Penghasilan komprehensif lainnya Other comprehensive income	(24.231)	85.945	35.304	(61.552)	40.350
Total penghasilan komprehensif tahun berjalan yang dapat diatribusikan kepada: Total comprehensive income for the year Attributed to Owners of the parent entity:					
Pemilik entitas induk Owners of the parent entity	(3.069.933)	117.206	86.365	142.660	180.846
Kepentingan non pengendali Non-controlling interest	-	-	-	-	-
Laba tahun berjalan per saham Earnings per share					
Dasar (dalam Rupiah penuh) Basic (in full Rupiah)	(141,52)	1,46	2,39	10,50	8,49
Dilusi (dalam Rupiah penuh) Diluted (in full Rupiah)	(133,90)	1,46	2,39	10,47	8,28

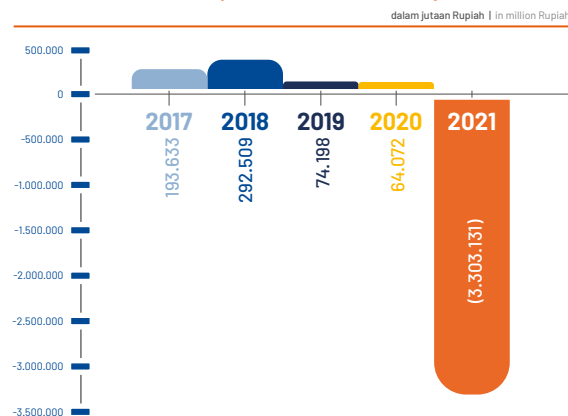
Pendapatan Bunga Interest income



Laba Tahun Berjalan Income for the year



Laba Sebelum Beban Pajak Income before tax expense



Arus Kas Cash Flows

Dalam jutaan rupiah/in million Rupiah

Uraian Description	2021	2020	2019	2018	2017
Arus kas dari aktivitas operasi Cash flows from operating activities	(1.139.643)	763.032	(2.622.775)	2.693.653	(786.629)
Arus kas dari aktivitas investasi Cash flows from investing activities	(578.146)	(271.034)	(721.503)	(373.840)	(727.544)
Arus kas dari aktivitas pendanaan Cash flows from financing activities	1.238.749	(243.681)	(40.843)	1.169.661	1.491.894
Kenaikan (penurunan) neto kas dan setara kas Net increase (decrease) in cash and cash equivalents	(479.041)	248.317	(3.385.121)	3.489.474	(22.278)
Kas dan setara kas awal tahun Cash and cash equivalents at beginning of year	2.619.308	2.370.991	5.756.112	2.266.638	2.288.916
Kas dan setara kas akhir tahun Cash and cash equivalents at end of year	2.140.267	2.619.308	2.370.991	5.756.112	2.266.638

Rasio Keuangan Financial Ratio

dalam % atau dinyatakan lain/in % or otherwise

Uraian Description	2021	2020	2019	2018	2017
KPMM (risiko kredit, pasar dan operasional) CAR (credit, market, and operational risk)	20,24	24,33	24,28	28,34	29,58
Rasio Aset Produktif bermasalah dan aset non produktif bermasalah terhadap Total Aset Produktif dan aset non produktif Productive and non-productive non-performing asset to total productive and non-productive asset	2,78	3,55	5,51	2,07	1,87
Rasio Aset Produktif bermasalah terhadap Total Aset Produktif Non-performing productive asset to total productive	2,88	3,69	5,81	2,24	2,01
Kredit Bermasalah (NPL) - kotor Non-Performing Loan (NPL) - Gross	3,98	4,97	7,66	2,86	2,59
Kredit Bermasalah (NPL) - bersih Non-Performing Loan (NPL) - Net	0,04	2,73	4,86	1,78	1,31
Imbal Hasil Aset (ROA) Return on Assets (ROA)	(14,75)	0,24	0,31	1,54	1,45
Imbal Hasil Ekuitas (ROE) Return on Equity (ROE)	(95,44)	0,75	1,16	5,8	5,64
Marjin Bunga Bersih (NIM) Net Interest Margin (NIM)	3,87	2,40	3,01	3,5	3,76
Beban Operasional/Pendapatan Operasional Operating Expense/Operating Income	287,86%	97,12	96,64	82,99	86,48

dalam % atau dinyatakan lain/in % or otherwise

Uraian Description	2021	2020	2019	2018	2017
Kredit/Dana Pihak Ketiga (DPK) Loan to Deposito Ratio (LDR)	86,01	84,76	91,59	86,75	88,33
Biaya Dana Cost of fund	4,08	5,97	7,02	6,91	7,13
Tingkat Suku Bunga Penyediaan Dana Funding Interest Rate	7,51	8,34	9,45	10,57	11,18
Rasio CKPN Keuangan terhadap Aset Produktif Allowance for Impairment Losses on Financial Assets to Earning Assets Ratio	11,72	3,86	3,27	2,26	2,55

Rasio Kepatuhan Compliance Ratio

dalam % atau dinyatakan lain/in % or otherwise

Uraian Description	2021	2020	2019	2018	2017
Pelanggaran BMPK LLL Violations					
Pihak Terkait Related party	0,00	0,00	0,00	0,00	0,00
Pihak tidak terkait Third party funds	0,00	0,00	0,00	0,00	0,00
Pelampauan BMPK LLL Exceeded					
Pihak Terkait Related party	0,00	0,00	0,00	0,00	0,00
Pihak tidak terkait Third party funds	2,70	0,00	0,00	0,00	0,00
GWM (Giro Wajib Minimum) Statutory Requirements					
GWM Utama Rupiah Main GWM Rupiah	3,70	3,64	7,01	6,65	6,72
GWM Valas Asing Foreign Exchange GWM	4,11	4,12	8,22	9,24	13,64
Posisi Devisa Neto Net Open Position	0,32	0,09	0,98	0,25	1,08

Ikhtisar Keberlanjutan

Sustainability Highlights

Uraian Description	Satuan	2021	2020	2019
Aspek Ekonomi (B.1) Economic Aspect (B.1)				
Laba Bersih Net Income	Rp juta IDR million	(3.045.701)	31.261	51.061
Dividen Dividend	Rp juta IDR million	-	-	40.842
Pembayaran Pajak Payment of Taxes	Rp miliar IDR billion	12,65	25,35	23,34
Produk Keuangan Berkelanjutan Sustainable Financial Products		-	-	-
Jumlah Pemasok Lokal Total Local Suppliers	Perusahaan	11	20	36
Aspek Lingkungan (B.1) Environmental Aspect (B.2)				
Penggunaan Listrik Electricity Usage	Gigajoule	3.400,98	3.519,27	3.581,58
Penggunaan Air Water Usage	m ³	6.430	7.497	7.527
Jumlah penyaluran kredit pada kegiatan usaha yang memenuhi kriteria berkelanjutan Amount of credit disbursement to business activities that meet sustainable criteria	Rp juta IDR million	2.266.314	2.777.116	2.448.187
Nilai Transaksi Elektronik Electronic Transaction Value	Rp juta IDR million	487.998	69.260	n/a
Aspek Sosial (B.1) Social Aspect (B.3)				
Jumlah Dana CSR Total CSR Fund	Rp	545.000.000	391.647.6767	509.371.569
Jumlah Karyawan Total Employees	Orang People	881	854	811
Kepuasan Pelanggan Customer's Satisfaction	%	89	95	n/a

Ikhtisar Saham Share Highlights

Tabel Harga, Volume Dan Kapitalisasi Saham Bank Raya
Price, Volume and Capitalisation Table of Bank Raya's Shares

2021	Harga Saham (Rp) Shares Price (IDR)			Volume Perdagangan di Pasar Reguler Trading Volume on the Regular Market (saham/stocks)	Jumlah Saham Beredar Total Outstanding Shares (juta saham/million shares)	Kapitalisasi Pasar Capitalisation (Rp Juta/ IDR Million)
	Tertinggi Highest	Terendah Lowest	Penutupan Closing			
Triwulan I Q1	1.639	734	998	15.630.000.000	21.343.290.230	21.770.156
Triwulan II Q2	1.947	783	1.903	6.290.000.000	21.592.666.681	41.512.699
Triwulan III Q3	2.857	1.781	2.192	7.390.000.000	21.691.981.527	48.556.269
Triwulan IV Q4	2.299	1.786	1.810	3.580.000.000	22.746.526.712	41.152.126

2020	Harga Saham (Rp) Shares Price (IDR)			Volume Perdagangan di Pasar Reguler Trading Volume on the Regular Market (saham/stocks)	Jumlah Saham Beredar Total Outstanding Shares (juta saham/million shares)	Kapitalisasi Pasar Capitalisation (Rp Juta/ IDR Million)
	Tertinggi Highest	Terendah Lowest	Penutupan Closing			
Triwulan I Q1	206	78	98	317.145.500	21.343.290.230	2.091.642
Triwulan II Q2	144	92	122	1.058.768.200	21.343.290.230	2.603.881
Triwulan III Q3	414	121	308	6.978.307.100	21.343.290.230	6.573.733
Triwulan IV Q4	1.110	304	1.035	13.028.701.100	21.343.290.230	22.090.305

Grafik Perdagangan Saham Share Price Movement Chart



Penghentian Sementara Perdagangan Saham (*Suspension*), dan/atau Penghapusan Pencatatan Saham (*Delisting*) Temporary Suspension of Stock Trading (*Suspension*), and/or Delisting of Shares

Selama tahun 2021 tidak ada penghentian sementara perdagangan saham (*suspension*) dan atau penghapusan pencatatan saham (*delisting*).

During 2021 there will be no temporary suspension of stock trading and/or delisting of shares.

Ikhtisar Efek Lainnya

Other Effects Overview

No	Uraian Description	Tanggal Penerbitan Issued Date	Tenor (tahun) Tenor (year)	Mata Uang Currency	Jumlah Obligasi (juta) Total Bonds (million)	Tanggal Jatuh Tempo Due Date	Tingkat Suku Bunga % Interest Rate %	Peringkat Rating		Wali Amanat Trustee
								2021	2020	
1.	Obligasi I Seri B	7 Juli 2017	5 tahun	Rp	239.000	7 Juli 2022	8,50%	Id AA oleh Pefindo	Id AA oleh Pefindo	BNI
	Bonds I Series B	7 July 2017	5 years	IDR		7 July 2022				

Aksi Korporasi

Corporate Action

PT Bank Raya Indonesia Tbk melakukan Penambahan Modal Dengan Memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD) melalui skema Penawaran Umum Terbatas (PUT) IX sejumlah 1.054.545.185 lembar dengan nilai perolehan dana sebesar Rp1.159.999.703.500.

PT Bank Raya Indonesia Tbk raised additional capital by issuing Pre-emptive Rights (PMHMETD) in the form of 1,054,545,185 shares with a total purchase value of Rp1,159,999,703,500 using the Limited Public Offering (PUT) IX plan.

Penghargaan dan Sertifikat (GRI 102-12)

Awards and Certifications (GRI 102-12)

Penghargaan 2021 **2021 AWARDS**

03 Juni
June **2021**

Penyelenggara : Infobank "10th Digital Brand Awards 2021"
Organiser : Infobank "10th Digital Brand Awards 2021"



Kredit Agro Griya - Bank Umum Konvensional (Buku 2)
Agro Griya Credit - Conventional Commercial Bank (Tier 2)

24 Agustus
August **2021**

Penyelenggara : Majalah Investor "Awards Best Bank 2021"
Organiser : Investor Magazine "Awards Best Bank 2021"



Bank Digital dengan Potensi Nasabah yang Besar & Loyal
Digital Bank with Big Potential & Loyal Customers

30 September
September **2021**

Penyelenggara : Infobrand "Indonesia TOP Digital PR Awards 2021"
Organiser : Infobrand "Indonesia TOP Digital PR Awards 2021"



Prestasi dalam membangun Digital Public Relation
Achievements in building Digital Public Relations

27 Oktober
October **2021**

Penyelenggara : Majalah Investor "ESG Awards 2021"
Organiser : Investor Magazine "ESG Awards 2021"



COMMITMENT CC
COMMITMENT CC

21 Oktober 2021
October

Penyelenggara : CNBC Indonesia "CNBC Indonesia Awards 2021"
Organiser : CNBC Indonesia "CNBC Indonesia Awards 2021"



The Most Profitable Digital Bank 2021
The Most Profitable Digital Bank 2021

21 Oktober 2021
October

Penyelenggara : CNBC Indonesia "CNBC Indonesia Awards 2021"
Organiser : CNBC Indonesia "CNBC Indonesia Awards 2021"



The Most Prospective Digital Bank 2021
The Most Prospective Digital Bank 2021

21 Desember 2021
December

Penyelenggara : Majalah IT Work "Top Digital Award"
Organiser : IT Work Magazine "Top Digital Award"



Top Digital Implementation 2021 #Level Stars 4
Top Digital Implementation 2021 #Level Stars 4

Sertifikasi Certifications

Sertifikasi ISO 37001:2016 Sistem Manajemen Anti Penyuapan (SMAP) dengan ruang lingkup proses Pengadaan Barang dan Jasa pada Bagian Umum dan Logistik Certification of ISO 37001:2016 Anti-Bribery Management System (SMAP) with the scope of the General and Logistics Section's Procurement of Goods and Services process.



Masa Berlaku Validity Period	: 23 Desember 2021 s/d 22 Desember 2024 December 23, 2021 to December 22, 2024
Lingkup Sertifikasi	: Proses Pengadaan Barang dan Jasa pada Bagian Umum dan Logistik, dengan Unit Kerja Pendukung Divisi <i>Legal & Compliance</i> , Divisi <i>Human Capital</i> , Divisi Operasional, Jaringan dan Layanan, <i>Desk Enterprise Risk Management</i> dan Satuan Kerja Audit Internal
Scope of Certification	General and Logistics Division Procurement Process, with Supporting Work Units Legal & Compliance Division, Human Capital Division, Operational Division, Network and Services Division, Enterprise Risk Management Desk, and Internal Audit Unit
Deskripsi Singkat	: Melalui penerapan Sistem Manajemen Anti Penyuapan ISO 37001:2016, Bank menunjukkan komitmennya untuk melaksanakan kegiatan bisnis secara transparan, akuntabel, bertanggung jawab, independen dan wajar serta terbebas dari praktik penerimaan suap, gratifikasi ataupun kegiatan lainnya yang bertentangan dengan prinsip Tata Kelola Perusahaan yang Baik.
Brief Elucidation	The Bank demonstrates its commitment to conducting business activities in a transparent, accountable, responsible, independent, and fair manner, free of the practise of accepting bribes, gratuities, or other activities that violate the principles of Good Corporate Governance, by implementing the ISO 37001:2016 Anti-Bribery Management System.
Lembaga (yang memberikan) Institution (the one providing)	: SUCOFINDO

Sertifikasi ISO 9001:2015 Sistem Manajemen Mutu (SMM) pada Bagian *Compliance* dan Bagian Anti *Money Laundering* - Divisi Legal & Compliance ISO 9001:2015 Quality Management System (QMS) Certification in the Compliance Section and Anti Money Laundering Section - Legal & Compliance Division



Masa Berlaku Validity Period	: 28 Desember 2021 s/d 27 Desember 2024 December 28, 2021 to December 27, 2024
Lingkup Sertifikasi	: Penerapan Sistem Manajemen Mutu di Bagian <i>Compliance</i> dan Bagian Anti <i>Money Laundering</i> (AML), Divisi <i>Legal & Compliance</i>
Scope of Certification	Implementation of a quality management system in the Compliance and Anti-Money Laundering (AML) Divisions, as well as in the Legal and Compliance Divisions.
Deskripsi Singkat	: Penerapan ISO 9001:2015 Sistem Manajemen Mutu merupakan salah satu upaya untuk mewujudkan <i>corporate culture</i> yang berkesinambungan dan bersinergi dalam menghasilkan kinerja terbaik sesuai dengan visi dan misi Bank Raya sebagai landasan yang kuat untuk pengembangan mutu yang berkelanjutan.
Brief Elucidation	The implementation of the ISO 9001:2015 Quality Management System is one of the efforts to create a sustainable and synergized corporate culture focused on delivering the best performance possible in accordance with Bank Raya's vision and mission, and to serve as a strong foundation for long-term quality development.
Lembaga (yang memberikan) Institution (the one providing)	: BSI

/ BAB 2

LAPORAN MANAJEMEN MANAGEMENT REPORT





/ Laporan Dewan Komisaris

Report of the Board of Commissioners

Budi Satria

Komisaris Utama

President Commissioner



“

Pada tahun 2021, Bank telah menjalankan bisnisnya sesuai dengan rencana kerja tahunan, visi dan misi serta arahan strategis. Melalui pengamatan cermat terhadap kondisi makro ekonomi, perubahan lingkungan usaha serta perilaku dan kebutuhan nasabah, Bank Raya mampu beradaptasi dan menerapkan strategi yang relevan sesuai perkembangan terkini.

In 2021, the Bank operated in accordance with its annual work plan, vision, mission, and strategic directions. Bank Raya is able to adapt and implement relevant strategies in response to recent developments by closely monitoring macroeconomic conditions, changes in the business environment, as well as customer behaviour and needs.

”

Para Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Puji dan syukur marilah terlebih dahulu kita panjatkan kehadiran Tuhan Yang Maha Esa yang telah melimpahkan nikmat dan karunia-Nya, sehingga PT Bank Raya Indonesia Tbk. dapat melalui tahun 2021 yang penuh tantangan dengan capaian kinerja yang cukup baik. Bersama ini kami sampaikan laporan pengawasan Dewan Komisaris atas pengelolaan Bank yang dijalankan oleh Direksi untuk tahun buku yang berakhir pada 31 Desember 2021 sekaligus sebagai bagian dari penerapan prinsip Tata Kelola Perusahaan yang Baik.

Kondisi Makro Ekonomi dan Industri Perbankan

Pandemi Covid-19 masih menjadi tantangan bagi perekonomian nasional di tahun 2021. Pemerintah dan pihak-pihak lainnya telah melakukan berbagai upaya untuk menanggulangi pandemi yang telah berlangsung sejak kuartal pertama tahun 2020 ini. Sejalan dengan itu, Pemerintah juga berupaya untuk memulihkan perekonomian nasional yang terpuruk akibat pandemi ini.

Salah satu langkah penting yang diambil Pemerintah di tahun 2021 adalah dengan menggelar program vaksinasi secara masif bagi seluruh warga secara gratis. Kendati harus menggelontorkan anggaran yang sangat besar, namun Pemerintah meyakini bahwa program vaksinasi dapat memberikan manfaat yang sangat besar, baik untuk melindungi masyarakat dari dampak yang virus Corona, juga dapat berdampak terhadap perekonomian karena masyarakat dapat kembali beraktivitas dengan rasa aman.

Selain itu, Pemerintah juga memberikan berbagai stimulus agar perekonomian nasional dapat kembali pulih, salah satunya dengan menjalankan program Pemulihan Ekonomi Nasional (PEN). Program PEN merupakan wujud hadirnya negara dalam membantu masyarakat yang tengah mengalami kesulitan yang disebabkan oleh pandemi Covid-19.

Melalui kebijakan tersebut, ekonomi Indonesia dapat kembali tumbuh positif di tahun 2021. Ekonomi Indonesia tumbuh 3,69% dengan tingkat inflasi yang terjadi pada level yang cukup rendah.

Respected Shareholders and Stakeholders,

With praise and gratitude, let us first pray to the presence of God Almighty, who has bestowed His favours and gifts, that PT Bank Raya Indonesia Tbk. will be able to navigate the year 2021, which will be filled with challenges, while maintaining a relatively high level of performance. We are submitting the Board of Commissioners' supervisory report on the management of the Bank by the Board of Directors for the fiscal year ending December 31, 2021, as well as a report on the Bank's implementation of the principles of Good Corporate Governance.

The Macroeconomic Environment and the Banking Industry

In 2021, the Covid-19 pandemic continues to pose a threat to the national economy. The government and other parties have made a variety of efforts to contain the pandemic, which began in the first quarter of 2020. In addition to that, the government is attempting to rehabilitate the country's economy, which has been crippled by the pandemic.

One of the significant steps the government will take in 2021 is to conduct a massive free vaccination programme for all citizens. Despite the high cost, the Government believes that the vaccination programme will provide enormous benefits, both in terms of protecting the community from the Corona virus's impact and in terms of economic impact as people return to their normal activities with a sense of security.

Additionally, the government provides various stimuli to aid in the recovery of the national economy, one of which is the National Economic Recovery (PEN) programme. The PEN programme is a manifestation of the state's presence in assisting those affected by the Covid-19 pandemic.

The Indonesian economy can resume positive growth in 2021 under this policy. The Indonesian economy grew at a 3,69% annual rate, with inflation remaining relatively low.

Sejalan dengan pertumbuhan ekonomi, industri perbankan juga dapat kembali menjalankan fungsi intermediasinya dengan lebih baik. Tahun 2021, penyaluran kredit perbankan kembali tumbuh positif. Setelah tahun sebelumnya mengalami pertumbuhan negatif, tahun 2021 penyaluran kredit perbankan kembali tumbuh positif walau masih relatif terbatas.

Pelaksanaan Tugas Dewan Komisaris

Tahun 2021 Dewan Komisaris telah melaksanakan tugas dan tanggung jawabnya untuk melakukan pengawasan terhadap pengelolaan Bank yang dijalankan oleh Direksi. Dewan Komisaris memastikan bahwa Bank telah dikelola sesuai peraturan perundang-undangan yang berlaku dan prinsip Tata Kelola Perusahaan yang Baik. Dewan Komisaris telah memastikan bahwa pengelolaan Bank telah sesuai dengan visi dan misi Bank dan aspirasi Pemegang Saham dengan tetap memperhatikan seluruh pemangku kepentingan.

Pengawasan Terhadap Implementasi Strategi

Peran dan fungsi pengawasan merupakan tugas utama yang diemban Dewan Komisaris, khususnya dalam memberikan masukan yang sejalan dengan aspirasi Pemegang Saham dan seluruh Pemangku Kepentingan. Dalam melaksanakan fungsi pengawasan, hubungan kerja antara Dewan Komisaris dan Direksi dibangun melalui kesamaan pandangan untuk mencapai visi dan misi Bank. Dalam menjalankan fungsi pengawasan, Dewan Komisaris berpegang pada Rencana Bisnis Bank (RBB) yang sebelumnya telah disampaikan Direksi dan mendapat persetujuan dari Otoritas Jasa Keuangan. Dewan Komisaris melakukan pemantauan dan *review* terhadap setiap inisiatif strategis yang dijalankan Direksi dan menilai kesesuaiannya dengan rencana Bank.

Pada tahun 2021, Bank telah menjalankan bisnisnya sesuai dengan rencana kerja tahunan, visi dan misi serta arahan strategis. Melalui pengamatan cermat terhadap kondisi makro ekonomi, perubahan lingkungan usaha serta perilaku dan kebutuhan nasabah, Bank Raya mampu beradaptasi dan menerapkan strategi yang relevan sesuai perkembangan terkini.

Dewan Komisaris menaruh perhatian khusus terhadap upaya peningkatan kualitas aset yang dilakukan Bank untuk mendukung program transformasi model bisnis Bank. Untuk itu, Dewan Komisaris senantiasa menekankan perlunya pengawasan melekat terhadap portofolio kredit untuk mengantisipasi penurunan kualitas kredit, percepatan peningkatan kualitas aset, dan penyaluran kredit secara selektif yang sesuai dengan visi dan misi Bank yang baru.

Selain itu, Dewan Komisaris juga melakukan pengawasan melalui laporan-laporan yang diterima, baik secara tertulis maupun lisan dari manajemen Bank, yang kemudian dibahas di dalam rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi, serta rapat yang diselenggarakan secara rutin dengan komite-komite di bawah Dewan Komisaris.

Economic growth also improves the banking industry's ability to perform its intermediation function. Bank lending will resume a positive growth trajectory in 2021. After a year of negative growth, banking loan disbursement will resume positive growth in 2021, though it will remain relatively limited.

Execution of the Board of Commissioners' Duties

The Board of Commissioners discharged its duties and responsibilities in 2021, supervising the Bank's management by the Board of Directors. The Board of Commissioners is responsible for ensuring that the Bank is managed in accordance with applicable laws and regulations and good corporate governance principles. The Board of Commissioners has ensured that the Bank's management is consistent with the Bank's vision and mission, as well as the Shareholders' aspirations, while still paying attention to all stakeholders.

Supervision of the Strategy's Execution

The Board of Commissioners' primary responsibility is to act as a supervisor, particularly in providing input that is consistent with the aspirations of Shareholders and all Stakeholders. In carrying out the supervisory function, the Board of Commissioners and the Board of Directors develop a working relationship based on a shared goal of achieving the Bank's vision and mission. The Board of Commissioners, in carrying out its supervisory function, adheres to the Bank's Business Plan (RBB), which was previously submitted by the Board of Directors and approved by the Financial Services Authority. The Board of Commissioners oversees and reviews each strategic initiative undertaken by the Board of Directors, determining its alignment with the Bank's objectives.

In 2021, the Bank operated in accordance with its annual work plan, vision, mission, and strategic directions. Bank Raya is able to adapt and implement relevant strategies in response to recent developments by closely monitoring macroeconomic conditions, changes in the business environment, as well as customer behaviour and needs.

The Board of Commissioners places a premium on the Bank's efforts to enhance asset quality in order to facilitate the Bank's business model transformation. As such, the Board of Commissioners consistently emphasises the importance of close credit portfolio supervision in order to anticipate a decline in credit quality, accelerate asset quality improvement, and selective lending consistent with the new Bank's vision and mission.

Additionally, the Board of Commissioners supervises through reports received from the Bank's management, both written and verbal, which are then discussed at Board of Commissioners meetings, Board of Commissioners meetings with the Board of Directors, and regularly scheduled meetings with the Board of Commissioners' committees.

Mekanisme dan Frekuensi Pengawasan

Hubungan kerja antara Dewan Komisaris dan Direksi di Bank Raya sudah terjalin dengan sangat baik dengan mengedepankan prinsip saling menghormati wewenang masing-masing pihak. Dewan Komisaris melakukan pengawasan terhadap implementasi strategi yang dijalankan Direksi. Dalam menjalankan fungsi pengawasan, Dewan Komisaris berpegang pada peraturan perundang-undangan yang berlaku dan menghormati hak dan wewenang Direksi dalam pengelolaan Bank. Pengawasan yang dilakukan Dewan Komisaris menggunakan beberapa mekanisme secara langsung maupun tidak langsung.

Mekanisme tidak langsung dilakukan dengan memeriksa laporan Bank, dimana sesuai peraturan perundang-undangan yang berlaku, Dewan Komisaris memiliki wewenang untuk melakukan pemeriksaan. Sedangkan mekanisme langsung dilakukan dengan melakukan rapat bersama Direksi, untuk meminta penjelasan Direksi terkait hal-hal yang menjadi perhatian Dewan Komisaris. Dalam rapat bersama tersebut, Dewan Komisaris juga melakukan review terhadap kinerja Bank pada setiap periode. Dalam forum tersebut, Dewan Komisaris dapat meminta penjelasan dari Direksi mengenai pencapaian kinerja Bank dan berbagai kendala yang dihadapi. Dewan Komisaris dapat menyampaikan pandangan dan memberikan nasihat kepada Direksi mengenai hal tersebut. Sepanjang 2021, Dewan Komisaris melaksanakan 24 (dua puluh empat) kali rapat gabungan dengan Direksi. Selain itu, Dewan Komisaris juga dapat memberikan pengutusan kepada Komite yang berada di bawah Dewan Komisaris untuk melakukan review maupun pengawasan terhadap hal-hal yang berkaitan dengan kinerja dan operasional Bank.

Penilaian Atas Kinerja Direksi

Tahun 2021 menjadi tahun yang penuh tantangan bagi Bank Raya. Selain pandemi Covid-19 yang masih berlanjut, di tahun 2021 Bank Raya berada di tahap awal dari program transformasi bisnis menuju bank digital. Dewan Komisaris memahami bahwa tantangan tersebut tidaklah ringan.

Dalam kondisi tersebut, Dewan Komisaris menilai Direksi telah menjalankan tugas dan tanggung jawabnya dengan baik. Berbagai inisiatif strategis yang dijalankan Direksi sepanjang tahun 2021 terbukti mampu membawa Bank dapat melalui tahun 2021 dengan baik. Inisiatif strategis tersebut juga menjadi pondasi yang sangat baik untuk pengembangan Bank Raya ke depan.

Direksi mampu membawa Bank melalui fase awal transformasi dengan baik. Tidak terdapat kendala ataupun gejolak yang berarti dalam proses transformasi ini, baik yang datang dari luar maupun internal Bank. Direksi juga mampu mengubah *mindset* karyawan sesuai dengan tuntutan model bisnis baru yang dijalankan Bank dan membangun tim yang solid untuk mendukung pencapaian visi dan misi Bank yang baru.

Mechanisms and Frequency of Monitoring

The working relationship between the Board of Commissioners and the Board of Directors of Bank Raya has been solidly established through a commitment to mutual respect for each party's authority. The Board of Commissioners is responsible for supervising the implementation of the Board of Directors' strategies. The Board of Commissioners adheres to applicable laws and regulations in carrying out its supervisory function and respects the Board of Directors' rights and authorities in managing the Bank. The Board of Commissioners supervises through a variety of mechanisms, either directly or indirectly.

The indirect mechanism is implemented by examining Bank reports, where the Board of Commissioners has the authority to conduct inspections in accordance with applicable laws and regulations. Meanwhile, the direct mechanism is implemented by convening a meeting with the Board of Directors to request clarification on matters of concern to the Board of Commissioners. The Board of Commissioners also reviews the Bank's performance during the joint meeting. The Board of Commissioners may request from the Board of Directors an explanation regarding the Bank's performance achievements and various roadblocks encountered. The Board of Commissioners has the authority to express opinions and advise the Board of Directors on this subject. Throughout 2021, the Board of Commissioners and the Board of Directors met jointly for 24 (twenty four) times. Additionally, the Board of Commissioners may appoint Committees to review and supervise the Bank's performance and operations.

Evaluation of the Board of Directors' Performance

Bank Raya has faced numerous challenges in 2021. Apart from the ongoing Covid-19 pandemic, Bank Raya is in the early stages of transforming itself into a digital bank in 2021. The Board of Commissioners recognises that this is not an easy task.

The Board of Commissioners determines that the Board of Directors has discharged its duties and responsibilities effectively in this condition. Various strategic initiatives undertaken by the Board of Directors throughout 2021 have demonstrated their ability to successfully navigate the Bank through 2021. This strategic initiative also lays a solid foundation for the future development of Bank Raya.

The Board of Directors did an excellent job of guiding the Bank through its initial transformation phase. There were no significant roadblocks or upheavals encountered during this transformation process, both externally and internally. The Board of Directors is also capable of reorienting employees' mindsets to meet the demands of the Bank's new business model and assembling a strong team to support the Bank's new vision and mission.

Dari sisi pencapaian kinerja, tahun 2021 secara umum Bank Raya dapat mencapai target yang ditetapkan dalam Rencana Bisnis Bank 2021. Target utama Bank di tahun 2021 adalah untuk memperbaiki kualitas aset agar dapat mendukung model bisnis baru Bank ke depan. Untuk itu, Direksi telah membentuk pencadangan dalam jumlah yang sangat besar, yaitu mencapai Rp3.885 miliar.

Di tengah proses transformasi dan upaya untuk meningkatkan kualitas aset, Bank tetap menjalankan fungsi intermediasinya dengan baik. Total kredit yang diberikan Bank Raya tahun 2021 mencapai Rp11.608 miliar, sedangkan dana pihak ketiga yang dihimpun Bank mencapai Rp13.496 miliar. Pencapaian penyaluran kredit tersebut setara dengan 92,07% dari RBB 2021 yang sejalan dengan rencana perusahaan untuk melakukan *revamp* kredit-kredit bisnis *legacy*.

Tahun 2021 Bank membukukan rugi bersih sebesar Rp3.046 miliar, namun kerugian tersebut utamanya disebabkan oleh upaya manajemen untuk memperbaiki kinerja perusahaan, antara lain dengan meningkatkan *NPL Coverage* Perseroan dari 103,96% di tahun 2020 menjadi 406,28% di tahun 2021.

Dampak atas pembukuan tersebut, Dewan Komisaris telah memberikan saran untuk terus melakukan perbaikan. Sekali lagi kami menghimbau kepada Direksi beserta seluruh jajarannya dalam upayanya membawa Bank Raya menapaki babak baru dalam pengembangan, dilakukan secara prudent mengedepankan prinsip kehati-hatian dan tata kelola yang baik.

Pandangan Atas Penerapan Prinsip Tata Kelola Perusahaan

Penerapan Prinsip Tata Kelola Perusahaan Yang Baik (*Good Corporate Governance*) di Bank Raya, yang berpedoman pada prinsip *Transparency, Accountability, Responsibility, Independence and Fairness* (TARIF), telah dilakukan dengan cukup baik.

Secara umum, Dewan Komisaris berpendapat bahwa penerapan GCG oleh Bank telah berjalan dengan relatif baik, tercermin dari (i) *Governance Structure* yang memadai sesuai dengan ketentuan berlaku, (ii) *Governance Process* yang secara berkesinambungan dilakukan penyempurnaan baik untuk kebijakan, proses dan juga kualitas sumber daya manusia serta (iii) *Governance Outcome* yang tercermin antara lain dari pencapaian kinerja keuangan Bank.

Bank Raya tetap konsisten mampu mempertahankan penilaian faktor Bank Raya tetap konsisten mampu mempertahankan penilaian faktor Tata Kelola di dalam Penilaian Tingkat Kesehatan Bank maupun Penilaian Tingkat Kesehatan Bank (Risk Based Bank Rating/RBBR) secara keseluruhan berdasarkan OJK di peringkat 2 (dua), yang mencerminkan kondisi Bank secara umum sehat, mampu menghadapi pengaruh negatif yang signifikan dari perubahan kondisi bisnis dan faktor eksternal lainnya, meskipun diterpa kondisi pandemi Covid-19.

In terms of performance, Bank Raya can generally meet the targets outlined in the Bank's 2021 Business Plan in 2021. The Bank's primary objective for 2021 is to enhance asset quality in order to support the Bank's future business model. To that end, the Board of Directors established a sizable reserve fund, which now totals IDR 3,885 billion.

Throughout the transformation process and efforts to improve asset quality, the Bank has performed admirably in its intermediation role. Bank Raya provided total credit of IDR 11,608 billion in 2021, while collecting IDR 13,496 billion in third party funds. Credit distribution is equivalent to 92.07% of the 2021 RBB, which is consistent with the company's strategy of restructuring legacy business loans.

The Bank recorded a net loss of IDR 3,046 billion in 2021, but the loss was primarily due to management's efforts to improve the Company's performance, including increasing the Company's *NPL Coverage* from 103.96% in 2020 to 406.28% in 2021.

The Board of Commissioners has made proposals for continued development as a consequence of the accounting. We did ask to the Board of Directors and all personnel to exercise caution in their efforts to move Bank Raya to a new stage of development, emphasising the exigencies of prudence and good governance.

Considerations Regarding the Application of Corporate Governance Principles

Bank Raya has done an excellent job of implementing Good Corporate Governance (GCG), which is guided by the principles of Transparency, Accountability, Responsibility, Independence, and Fairness (TARIF).

In general, the Board of Commissioners believes that the Bank's implementation of GCG has been relatively successful, as evidenced by (i) an adequate governance structure that complies with applicable regulations, and (ii) a governance process that continuously improves policies, processes, and resource quality, human resources, and (iii) Governance Outcome, which is reflected in the Bank's financial performance, among other things.

Bank Raya has consistently maintained the Governance factor Bank Raya has continuously been able to retain both the bank's soundness level and the overall risk-based bank rating (RBBR) on the basis of FSA of 2 (two), which reflects the Bank's overall condition. Despite the Covid-19 pandemic, the economy is generally healthy, able to withstand significant negative effects from changes in business conditions and other external factors.

Namun, Dewan Komisaris juga mengakui masih terdapat kelemahan-kelemahan yang perlu diperbaiki dan disempurnakan dalam Penerapan Prinsip Tata Kelola di dalam organisasi Bank saat ini.

Dewan Komisaris memberikan dukungan dengan senantiasa mengawasi dan memberikan masukan kepada manajemen terhadap peningkatan kualitas Penerapan Tata Kelola Perusahaan yang baik, sebagai salah satu faktor yang dapat meningkatkan nilai perusahaan di masyarakat.

Dewan Komisaris mengharapkan konsistensi dan komitmen dari seluruh lini organisasi pada Bank untuk menerapkan prinsip-prinsip Tata Kelola Perusahaan Yang Baik yang dijiwai oleh Nilai-nilai Perusahaan dengan pemahaman yang sungguh baik, sebagai salah satu tiang penyangga dalam setiap aktivitas bisnis dan operasional Bank, untuk menghasilkan pertumbuhan kinerja positif yang berkesinambungan bagi kesejahteraan seluruh *stakeholders* Bank.

Penerapan Manajemen Risiko

Penerapan Manajemen Risiko menjadi bagian yang sangat penting bagi Bank. Manajemen Risiko merupakan upaya pencegahan terkait berbagai hal yang tidak sesuai dengan kondisi semestinya, baik terkait bisnis maupun operasional Bank.

Penerapan Manajemen Risiko telah berjalan dengan baik dengan mekanisme pengawasan melalui Rapat Komite Pemantau Risiko setiap bulan, sehingga Dewan Komisaris dapat memantau risiko Bank dari seluruh aspek.

Mitigasi risiko khususnya selama masa pandemi ditekankan pada peningkatan risiko kredit, dimana hal ini telah dilakukan oleh Bank dengan *early warning system* melalui pemantauan bisnis debitur secara ketat, melakukan *stress test* terhadap kemungkinan penurunan kualitas kredit debitur agar dapat segera diambil langkah-langkah antisipasi yang diperlukan, serta percepatan penyelesaian NPL dan AYDA.

Pandangan Atas Penerapan Whistleblowing System

Whistleblowing system (WBS) merupakan bagian dari Penerapan Tata Kelola Perusahaan yang baik. Dalam melaksanakan WBS, Bank Raya telah memiliki mekanisme khusus agar pelaksanaan WBS dapat berjalan dengan efektif dan dapat melakukan analisa dan deteksi dini *fraud* atau pelanggaran yang terjadi di internal Bank.

Upaya sosialisasi *whistleblowing system* yang telah dilakukan di internal Bank antara lain adalah melalui *e-learning*, pemasangan poster di kantor-kantor Bank dan berbagai upaya lainnya yang dipandang perlu untuk meningkatkan *awareness* akan pentingnya WBS dalam memelihara kinerja operasional Bank yang sehat dengan tetap menjaga kerahasiaan identitas pelapor (*whistleblower*).

However, the Board of Commissioners recognises that there are still weaknesses in the application of Governance Principles within the Bank's current organisation that need to be addressed and perfected.

The Board of Commissioners assists management by monitoring and providing feedback on the quality of Good Corporate Governance implementation, which is one of the factors that contribute to the company's social value.

The Board of Commissioners expects consistency and commitment from all organisational lines at the Bank to apply the principles of Good Corporate Governance, imbued with Corporate Values, as a pillar in all business activities and operations of the Bank, in order to generate sustainable positive performance growth for the benefit of all Bank stakeholders.

Risk Management in Practice

Risk management is a critical component of the Bank's operations. Risk management is an effort to prevent various things from occurring that are not in accordance with the proper conditions, both in the Bank's business and operations.

Risk management has been implemented successfully, with a supervisory mechanism in place via the Risk Monitoring Committee Meetings held monthly, allowing the Board of Commissioners to monitor the Bank's risk from all angles.

Risk mitigation, particularly during the pandemic, is focused on increasing credit risk, which the Bank has accomplished through an early warning system that includes rigorous monitoring of the debtor's business and conducting stress tests on the possibility of a decline in debtor credit quality in order to take the necessary anticipatory steps immediately, and acceleration of the resolution of NPLs and AYDAs.

Opinions on the Whistleblowing System's Implementation

Whistleblowing systems (WBS) are an integral part of implementing good corporate governance. Bank Raya has a unique mechanism for implementing the WBS that enables the implementation to run smoothly and to perform analysis and early detection of fraud or other violations that occur within the Bank.

Internal efforts to socialise the whistleblowing system have included e-learning, the posting of posters in Bank offices, and various other measures deemed necessary to raise awareness of the critical role of WBS in ensuring the Bank's operational risk-based rating while maintaining identity confidentiality.

Dewan Komisaris telah menyampaikan beberapa arahan dalam menyusun kebijakan, prosedur dan implementasi WBS di Bank Raya.

Dewan Komisaris berperan aktif dalam mengawasi pengelolaan WBS, mulai dari proses deteksi dini *fraud* hingga penyelesaian kejadian *fraud* atau pelanggaran serta perlindungan kerahasiaan bagi *whistleblower*. Dewan Komisaris juga menekankan kembali agar penerapan WBS di Bank Raya dilaksanakan secara lebih efektif dan konsisten sehingga dapat meminimalisir potensi terjadinya internal *fraud*.

Penilaian Kinerja Komite di Bawah Dewan Komisaris

Dalam menjalankan fungsi, tugas dan tanggung jawabnya, Dewan Komisaris dibantu oleh komite-komite di bawah Dewan Komisaris, yaitu Komite Audit, Komite Remunerasi dan Nominasi, dan Komite Pemantau Risiko.

Tahun 2021, Dewan Komisaris menilai bahwa Komite telah menjalankan fungsinya dengan baik, dengan merekomendasikan hal-hal penting terkait pengelolaan dan kinerja Bank yang menjadi perhatian Dewan Komisaris, melalui rapat-rapat komite yang diselenggarakan secara teratur, sesuai dengan ketentuan regulator, serta melakukan *follow-up* atas rekomendasi-rekomendasi yang diberikan dalam rapat Komite.

Pandangan Atas Prospek Usaha yang Disusun Direksi

Proses pemulihan ekonomi dari dampak pandemi Covid-19 telah berjalan dengan cukup baik di tahun 2021. Pemerintah berkomitmen untuk terus mendukung percepatan pemulihan ekonomi melalui program PEN yang masih akan dilanjutkan di tahun 2022. Karena itu, Bank Indonesia memprediksi pertumbuhan ekonomi Indonesia tahun 2022 akan lebih tinggi dibandingkan tahun 2021, yaitu berada pada kisaran 4,7% - 5,5%.

Direksi telah menyusun RBB 2022 dengan mempertimbangkan berbagai asumsi makro ekonomi dan kondisi internal Bank. Dewan Komisaris mendukung pencapaian berbagai target yang ditetapkan Direksi dalam RBB 2022. Bank Raya memiliki potensi yang sangat besar untuk terus berkembang. Terlebih dengan model bisnis yang baru yang dikembangkan Bank.

Segmen *gig economy* menyimpan potensi yang sangat besar dan selama ini belum banyak tersentuh oleh industri perbankan. Bank Raya dapat mengoptimalkan potensi tersebut dengan memberikan produk dan layanan yang sesuai dengan kebutuhan target pasar dengan tetap mengedepankan pelayanan prima yang selama ini sudah dibangun Bank. Namun demikian, Bank Raya harus dapat mengoptimalkan *ecosystem* di BRI Group dengan menjalin kerjasama dan kolaborasi agar target-target keuangan dapat tercapai dengan baik pula.

The Board of Commissioners has issued several directives regarding the development of WBS policies, procedures, and implementation at Bank Raya.

The Board of Commissioners is actively involved in supervising WBS management, from early detection of fraud to resolving incidents of fraud or violations, as well as protecting whistleblower confidentiality. Additionally, the Board of Commissioners reiterates that the implementation of WBS at Bank Raya is more effective and consistent, minimising the possibility of internal fraud.

Evaluation of the Performance of Committees Reporting to the Board of Commissioners

The Board of Commissioners is assisted in carrying out its functions, duties, and responsibilities by committees within the Board of Commissioners, namely the Audit Committee, the Remuneration and Nomination Committee, and the Risk Monitoring Committee.

In 2021, the Board of Commissioners believes that the Committee has effectively discharged its responsibilities by recommending significant matters concerning the management and performance of the Bank that are of concern to the Board of Commissioners, via committee meetings that are held on a regular basis and in accordance with regulatory requirements, and by following up on the Committee's recommendations.

The Board of Directors' Perspectives on Business Prospects

The economic recovery process following the impact of the Covid-19 pandemic was quite successful in 2021. The government is committed to accelerating economic recovery in 2022 through the PEN programme. As a result, Bank Indonesia forecasts that Indonesia's economic growth will accelerate in 2022, higher than the forecast for 2021, which is between 4.7 and 5.5%.

The Board of Directors developed the 2022 RBB by taking into account a variety of macroeconomic assumptions and the Bank's internal circumstances. The Board of Commissioners supports the Board of Directors in achieving the various targets outlined in the 2022 RBB. Bank Raya has enormous growth potential. Particularly with the Bank's newly developed business model.

The *gig economy* segment is enormously lucrative and has received little attention from the banking industry thus far. Bank Raya can maximise this potential by offering products and services that meet the needs of the target market while still prioritising the Bank's excellent service. Bank Raya, on the other hand, must be able to optimise the BRI Group's ecosystem through cooperation and collaboration in order to meet financial targets as well.

Perubahan Komposisi Dewan Komisaris

Tahun 2021, komposisi Dewan Komisaris Bank Raya mengalami perubahan sesuai dengan keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan yang diselenggarakan pada tanggal 9 April 2021. Berdasarkan keputusan RUPS tersebut, pemegang saham memberhentikan dengan hormat Sdri. Anna Maria Tjiadarma, sebagai Komisaris Independen, Sdr. A.Y. Soepadmo, sebagai Komisaris Independen dan Sdr. I.B.K. Suamba Manuaba, sebagai Komisaris. RUPS kemudian mengangkat Sdr. Eko B. Supriyanto, sebagai Komisaris Independen, Sdri. Rina Sa'adah, sebagai Komisaris Independen, Sdr. Rama G. Notowidigdo, sebagai Komisaris Independen dan Sdr. Achmad F.C. Barir, sebagai Komisaris, sehingga komposisi Dewan Komisaris Bank berubah menjadi sebagai berikut:

Komisaris Utama	: Budi Satria
Komisaris Independen	: Eko B. Supriyanto
Komisaris Independen	: Rina Sa'adah
Komisaris Independen	: Rama G. Notowidigdo
Komisaris	: Achmad F.C Barir

Atas nama Bank Raya, kami memberikan apresiasi dan ucapan terima kasih kepada Sdri. Anna Maria Tjiadarma, Sdr. A.Y. Soepadmo dan Sdr. I.B.K. Suamba Manuaba atas dedikasi dan kontribusi yang diberikan selama menjabat sebagai anggota Dewan Komisaris Bank.

Penutup

Tahun 2021 yang penuh tantangan telah dapat dilalui dengan capaian kinerja yang baik. Dewan Komisaris memberikan apresiasi kepada Direksi dan jajarannya serta seluruh karyawan Bank Raya atas kerja keras dan dedikasinya sehingga mampu mewujudkan kinerja yang baik tersebut.

Dewan Komisaris juga menyampaikan ucapan terima kasih kepada Pemegang Saham atas kepercayaan dan dukungannya sehingga Dewan Komisaris dapat menjalankan tugas dan tanggung jawabnya dengan baik. Kepada seluruh nasabah dan mitra kerja, Dewan Komisaris juga mengucapkan terima kasih atas kepercayaan dan kerjasama yang telah terjalin dengan sangat baik. Bank Raya berkomitmen untuk terus memberikan nilai dan manfaat yang berkelanjutan kepada nasabah dan seluruh pemangku kepentingan.

Changes in the Board of Commissioners' Composition

In 2021, the composition of Bank Raya's Board of Commissioners will be determined by the Annual General Meeting of Shareholders (GMS) to be held on April 9, 2021. The shareholders honourably dismissed Ms. Anna Maria Tjiadarma as Independent Commissioner, Mr. A.Y. Soepadmo as Independent Commissioner, and Mr. I.B.K. Suamba Manuaba as Commissioner, based on the GMS's decision. The GMS then appointed Mr. Eko B. Supriyanto as Independent Commissioner, Ms. Rina Saadah as Independent Commissioner, Mr. Rama Notowidigdo as Independent Commissioner, and Mr. Achmad F.C. Barir as Commissioner, resulting in the following composition of the Bank's Board of Commissioners:

President Commissioner	: Budi Satria
Independent Commissioner	: Eko B. Supriyanto
Independent Commissioner	: Rina Sa'adah
Independent Commissioner	: Rama G. Notowidigdo
Commissioner	: Achmad F.C Barir

We would like to express our appreciation and gratitude to Ms. Anna Maria Tjiadarma, Mr. A.Y. Soepadmo, and Mr. I.B.K. Suamba Manuaba on behalf of Bank Raya for their dedication and contribution during their tenure as members of the Bank's Board of Commissioners.

Closing

The year 2021, which was fraught with difficulties, has passed with notable accomplishments. The Board of Commissioners wishes to express its gratitude to the Board of Directors and their staff, as well as to all employees of Bank Raya, for their diligence and dedication in achieving this excellent performance.

Additionally, the Board of Commissioners wishes to express gratitude to Shareholders for their confidence and support, which enables the Board of Commissioners to carry out their duties and responsibilities effectively. Additionally, the Board of Commissioners wishes to express gratitude to all customers and business partners for the mutual trust and cooperation that has been established. Bank Raya is committed to providing long-term value and benefits to its customers and other stakeholders.

Jakarta, Maret/March 2022

Atas Nama Dewan Komisaris

On behalf of the Board of Commissioners

Budi Satria

Komisaris Utama

President Commissioner



1. **Budi Satria**
Komisaris Utama
President Commissioner
2. **Eko B. Supriyanto**
Komisaris Independen
Independent Commissioner
3. **Rina Sa'adah**
Komisaris Independen
Independent Commissioner
4. **Rama G. Notowidigdo**
Komisaris Independen
Independent Commissioner
5. **Achmad F. C. Barir**
Komisaris
Commissioner





/ Laporan Direksi Report of the Board of Directors

Kaspar Situmorang

Direktur Utama

President Director



“

Bank Raya sangat optimis menghadapi tahun 2022. Karena itu, Bank akan terus melakukan perbaikan internal agar dapat memberikan pelayanan terbaik bagi nasabah. Bank Raya akan memperkuat infrastruktur teknologi agar dapat beroperasi sebagai Bank Digital secara penuh. Bank akan mengadopsi teknologi terkini dan berkolaborasi dengan ekosistem BRI Group untuk meningkatkan daya saing di tengah persaingan yang semakin meningkat.

Bank Raya is extremely optimistic about the year 2022. As a result, the bank will continue to make internal improvements to ensure that customers receive the best service possible. Bank Raya will bolster its technology infrastructure in order to operate fully as a digital bank. The bank will leverage cutting-edge technology and collaborate with the BRI Group ecosystem to boost its competitiveness in an environment of growing competition.

”

Para Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Puji dan syukur marilah kita panjatkan kehadiran Tuhan Yang Maha Kuasa yang telah melimpahkan nikmat dan karunia-Nya kepada kita semua sehingga PT Bank Raya Indonesia Tbk. dapat melalui tahun 2021 yang penuh tantangan dan dinamika dengan baik. Bersama ini kami sampaikan pokok-pokok laporan pertanggungjawaban Direksi atas pengelolaan Bank untuk tahun buku yang berakhir pada 31 Desember 2021 beserta Laporan Keuangan yang telah diaudit oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja dan memperoleh opini laporan keuangan disajikan secara wajar, dalam semua hal yang material, posisi keuangan Bank tanggal 31 Desember 2021 dan 31 Desember 2020 sesuai dengan Standar Akutansi Keuangan di Indonesia.

Kondisi Ekonomi dan Industri Perbankan Tahun 2021

Proses pemulihan ekonomi baik di tingkat global maupun nasional dari dampak pandemi Covid-19 telah berjalan dengan cukup baik di tahun 2021. Kendati pandemi masih terus berlanjut hingga saat ini, namun kegiatan ekonomi telah kembali menggeliat. Perekonomian pun kembali tumbuh.

Program vaksinasi yang dijalankan secara serentak di hampir semua negara menjadi *game changer*. Walau untuk menjalankan program tersebut dibutuhkan anggaran yang sangat besar, namun masyarakat yang telah melakukan vaksinasi dapat kembali beraktivitas dengan rasa khawatir yang lebih rendah, sehingga roda ekonomi dapat kembali berputar.

Hampir semua negara telah berhasil keluar dari jerat resesi ekonomi yang terjadi di tahun 2020. Lembaga Dana Moneter Internasional (IMF) dalam laporan *World Economic Outlook* yang dirilis pada Januari 2022 memprediksi pertumbuhan ekonomi global tahun 2021 akan mencapai 5,9%, meningkat signifikan dibandingkan tahun sebelumnya dimana ekonomi global mengalami kontraksi 3,5%.

Distinguished Shareholders and Stakeholders,

Praise and blessing, let us pray to the presence of God Almighty, who has bestowed His favours and gifts on all of us, that PT Bank Raya Indonesia Tbk. will be able to navigate the challenging and dynamic year of 2021 successfully. We hereby transmit the Board of Directors' accountability report to the Bank's management for the fiscal year ending December 31, 2021, as well as the financial statements that have been audited and obtained an opinion from the Purwantono, Sungkoro & Surja Public Accounting Firm laporan keuangan disajikan secara wajar, dalam semua hal yang material, posisi keuangan Bank tanggal 31 Desember 2021 dan 31 Desember 2020 sesuai dengan Standar Akutansi Keuangan di Indonesia

Condition of the Economy and Banking Industry in 2021

Economic recovery from the impact of the Covid-19 pandemic has progressed quite well at both the global and national levels in 2021. While the pandemic continues, economic activity has recovered. The economy has resumed growth.

Vaccination programmes that are implemented concurrently in nearly every country have become a game changer. Even though the programme costs a lot of money to run, people who have been vaccinated can go back to their normal lives with less fear, which helps the economy move again.

Almost every country has emerged from the economic recession that began in 2020. A report from the International Monetary Fund (IMF) says that the global economy will grow by 5.9% in 2021, which is a big change from the previous year, when the global economy shrank by 3.5%.

Hal yang sama juga terjadi di Indonesia. Pemerintah telah melakukan berbagai hal dalam menangani pandemi Covid-19. Sejalan dengan itu, Pemerintah juga berupaya untuk memulihkan ekonomi nasional yang terpuruk setelah dihantam badai pandemi Covid-19.

Di bidang kesehatan, Pemerintah fokus untuk meningkatkan kualitas dan kapasitas fasilitas kesehatan. Selain itu, Pemerintah juga menggelontorkan anggaran yang sangat besar untuk menjalankan program vaksinasi bagi seluruh warga secara gratis dengan tujuan menghindarkan warga dari dampak terburuk dari virus Corona.

Pemerintah Indonesia juga mengambil sejumlah kebijakan untuk menekan laju penyebaran Covid-19, termasuk Pemberlakuan Pembatasan Kegiatan Masyarakat (PPKM). Kebijakan tersebut terbukti membuahkan hasil yang sangat baik, sehingga penyebaran Covid-19 dapat ditekan dengan sangat signifikan.

Di bidang ekonomi, Pemerintah memberikan berbagai stimulus fiskal dan moneter bagi pelaku usaha melalui program Pemulihan Ekonomi Nasional (PEN). Melalui program ini juga Pemerintah memberikan bantuan kepada warga yang terdampak oleh pandemi Covid-19.

Program PEN merupakan bentuk respons kebijakan yang ditempuh oleh Pemerintah dalam upaya menjaga dan mencegah aktivitas usaha dari pemburukan lebih lanjut, mengurangi semakin banyaknya pemutusan hubungan kerja dengan memberikan subsidi bunga kredit bagi debitur usaha mikro, kecil, dan menengah yang terdampak, mempercepat pemulihan ekonomi nasional, serta untuk mendukung kebijakan keuangan negara.

Melalui berbagai kebijakan tersebut, Indonesia berhasil keluar dari jurang resesi ekonomi. Ekonomi Indonesia mengalami pertumbuhan 3,69%. Pertumbuhan tersebut jauh lebih baik dibandingkan tahun sebelumnya, dimana ekonomi Indonesia mengalami kontraksi 2,07%. Namun demikian, jika dibandingkan dengan era sebelum pandemi, pertumbuhan ekonomi nasional masih belum kembali.

Seiring dengan membaiknya pertumbuhan ekonomi nasional, industri perbankan juga kembali bertumbuh. Pertumbuhan industri perbankan salah satunya dapat dilihat dari kembali bertumbuhnya penyaluran kredit perbankan. Setelah tahun 2020 lalu mengalami pertumbuhan negatif, tahun 2021 penyaluran kredit perbankan kembali tumbuh positif kendati masih relatif terbatas. Hingga akhir tahun 2021 kredit perbankan tumbuh 5,24% menjadi Rp5.768,6 triliun, dari tahun sebelumnya Rp5.447,5 triliun.

Selain itu, Dana pihak ketiga (DPK) tahun 2021 sebesar Rp7.479,5 triliun tumbuh 12,21% yoy dari tahun 2020. Pertumbuhan DPK tahun 2021 utamanya di dorong oleh produk giro rupiah yang tumbuh

In Indonesia, the same thing occurred. The government has implemented a number of measures to combat the Covid-19 pandemic. Additionally, the government is attempting to rehabilitate the national economy, which was devastated by the Covid-19 pandemic.

The government's priority in the health sector is to improve the quality and capacity of health facilities. Additionally, the government has allocated a sizable budget to run a free vaccination programme for all citizens in order to protect them from the worst effects of the Corona virus.

Additionally, the Indonesian government has implemented a number of policies to slow the spread of Covid-19, including Restrictions on Community Activities (PPKM). This policy has been shown to produce excellent results, allowing for a significant reduction in the spread of Covid-19.

Through the National Economic Recovery (PEN) programme, the government provides various fiscal and monetary stimuli to business actors. Additionally, the government provides assistance to residents impacted by the Covid-19 pandemic through this programme.

The PEN programme is the government's way of trying to keep business going and stop it from getting worse. It also tries to cut down on layoffs by giving credit interest subsidies to small and medium-sized businesses that have been hit by the recession.

As a result of these various policies, Indonesia emerged from the abyss of economic recession as a result. Indonesia's economy grew at a 3,69% annual rate until the third quarter of 2021. This was a significant improvement over the previous year, when the Indonesian economy contracted by 2.07%. However, in comparison to the pre-pandemic era, national economic growth has yet to resume.

Along with improved economic growth on a national level, the banking industry is reviving. One indicator of the banking industry's growth is the resurgence of bank lending. After a year of negative growth in 2020, bank lending will resume growth in 2021, though it will remain relatively limited. Bank credit increased by 5.24%, reaching IDR 5,768.6 trillion, up from IDR 5,447.5 trillion the previous year.

Furthermore, Third-party funds (DPK) in 2021 totaled Rp7,479.5 trillion, a 12.21% increase over the previous year. Deposit growth in 2021 was led by rupiah deposit products, which increased 20.38%

20,38% menjadi Rp1.591,5 triliun, sedangkan produk deposito rupiah tumbuh 4,01% dan produk tabungan rupiah tumbuh 8,34%.

Di lain pihak, transaksi ekonomi dan keuangan digital terus tumbuh seiring meningkatnya akseptasi dan preferensi masyarakat untuk berbelanja daring, perluasan dan kemudahan sistem pembayaran digital, serta akselerasi *digital banking*. Nilai transaksi Uang Elektronik sampai dengan triwulan III-2021 meningkat 45,05% (yoy) menjadi Rp209,8 triliun. Demikian pula, nilai transaksi digital banking sampai dengan triwulan III-2021 meningkat 46,72% (yoy) menjadi Rp28,7 triliun. Bank Indonesia akan berupaya mempercepat digitalisasi sistem pembayaran untuk mendukung akselerasi ekonomi keuangan digital nasional. Berbagai program digitalisasi sistem pembayaran, seperti perluasan QRIS, Standar Nasional Open API Pembayaran (SNAP) dan reformasi regulasi, serta rencana implementasi BI-FAST terus diakselerasi.

Transformasi Bank Raya

Berdasarkan keputusan Rapat Umum Pemegang Saham Luar Biasa yang diselenggarakan pada tanggal 27 September 2021, Pemegang Saham menyetujui perubahan nama Bank dari PT Bank Rakyat Indonesia Agroniaga Tbk menjadi PT Bank Raya Indonesia Tbk dengan nama komersial Bank Raya. Perubahan nama ini menjadi bagian dari transformasi yang dilakukan Bank dalam rangka menyelaraskan dengan visi dan misi Bank yang baru, yaitu *The Best Digital Bank by Becoming House of Fintech and Home for Gig Economy*, dan agar sesuai dengan *corporate image Bank Digital*.

Bank Raya membidik sektor *gig economy*, yaitu pasar tenaga kerja yang selama ini identik dengan karyawan kontrak jangka pendek (*half-unemployed*) atau pekerja lepas (*freelancer*). Sektor ini tumbuh sangat pesat dalam beberapa tahun terakhir. Berdasarkan data Badan Pusat Statistik (BPS), jumlah pekerja independen atau kontrak pendek di Indonesia pada 2020 mencapai 46 juta orang, atau tumbuh sekitar 27%. *Full time employer* berkurang 8,8% karena pandemi, dan bertumbuhnya *gig economy* itu memberikan sumber potensi baru bagi bank.

Bank Raya membidik sektor *gig economy* sebagai basis pertumbuhan baru dan akan memanfaatkan teknologi bank digital untuk menjangkau para *gig economy workers* yang selama ini belum terlayani oleh penyedia jasa industri keuangan. Di tengah pandemi, pekerja yang melek digital terbukti mampu bangkit lebih cepat, meski kebanyakan bergerak di sektor informal. Berbasis kinerja fundamental yang kuat, Bank Raya akan memaksimalkan aplikasi Raya & Pinang yang terus dikembangkan untuk menggarap pasar pekerja di sektor informal yang melek digital tersebut.

to IDR 1,591.5 trillion, while rupiah saving products increased 4.01% and rupiah demand deposits increased 8.34%.

On the other hand, digital economic and financial transactions continue to expand in lockstep with growing public acceptance and preference for online shopping, the expansion and convenience of digital payment systems, and the acceleration of digital banking. The value of electronic money transactions increased 45.05% year on year to IDR 209.8 trillion in the third quarter of 2021. Similarly, the value of digital banking transactions increased by 46.72% year on year to IDR 28.7 trillion in the third quarter of 2021. Bank Indonesia will work to accelerate the digitization of the payment system in order to assist the country's digital financial economy in growing. Numerous payment system digitisation initiatives, including the expansion of QRIS, the National Open API Payment Standard (SNAP), and regulatory reforms, such as the BI-FAST implementation plan, are being accelerated.

Transformation of Bank Raya

The shareholders approved the change of the bank's name from PT Bank Rakyat Indonesia Agroniaga Tbk to PT Bank Raya Indonesia Tbk with the commercial name Bank Raya following the decision of the Extraordinary General Meeting of Shareholders held on September 27, 2021. This name change is part of the bank's transformation to align with the new bank's vision and mission, namely to be The Best Digital Bank by Becoming House of Fintech and Home for Gig Economy, and to align with the digital bank's corporate image.

Bank Raya is focusing on the gig economy sector, specifically the labour market, which has historically been associated with temporary contract workers (*half-employed*) or freelancers. This sector has expanded at a breakneck pace in recent years. According to data from the Central Statistics Agency (BPS), the number of independent or temporary workers in Indonesia reached 46 million in 2020, an increase of approximately 27%. Employers on a full-time basis have dropped by 8.8% because of the pandemic, and the growing gig economy has given banks a new source of income.

Bank Raya is eyeing the gig economy as a potential growth area and will leverage digital banking technology to reach gig economy workers who have been overlooked by financial industry service providers. In the face of a pandemic, digitally literate workers have demonstrated an ability to rise more quickly, despite the fact that the majority of them work in the informal sector. Bank Raya will use its strong financial performance to get the most out of the Raya & Pinang app, which is being built for the informal sector's digitally literate labour market.

Kebijakan Strategis Bank Raya Tahun 2021

Operating Model Bank Raya

Selama tahun 2021, Bank Raya mempersiapkan *operating model* Bank Raya yang terdiri dari tiga bagian besar, yaitu Klasifikasi, Koordinasi dan Kolaborasi. Bagian pertama, yaitu klasifikasi terdiri dari Bisnis Ekspansi dan Bisnis Legasi. Bisnis Ekspansi merupakan pengembangan produk-produk digital di Bank Raya, seperti *Raya Digital Saving* dan *Pinang*. Sedangkan Legasi merupakan pengelolaan bisnis eksisting di Bank Raya dengan tujuan untuk menjaga kualitas aset serta memaksimalkan pencapaian *recovery*.

Bagian kedua, yaitu Koordinasi terdiri dari empat *function group* di Bank Raya, yaitu *Technology*, *Support*, *Product & Services*, dan *Sales*. Keempat *function group* di Bank Raya ini memiliki peranannya masing-masing dan berkoordinasi secara kohesif untuk menghasilkan *output* baik secara finansial maupun non finansial. Bagian ketiga, yaitu Kolaborasi merupakan penerapan metodologi *agile* berupa implementasi *Tribe* dan *Squad* di Bank Raya agar keempat *function group* di Bank Raya dapat berkoordinasi secara terstruktur untuk mencapai target. Saat ini terdapat 4 *Tribe* di Bank Raya, yaitu *Tribe Pinang (Digital Lending)*, *Tribe Raya (Digital Saving)*, *Tribe Legacy* dan *Tribe National Sales*.

Aspirasi Bank Raya

Bank Raya memiliki visi sebagai *The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy*. Kebijakan strategis yang dijalankan Direksi tahun 2021 adalah untuk mendukung program transformasi model bisnis yang dijalankan Bank. Sejalan dengan program transformasi tersebut, strategi tahun 2021 Bank Raya adalah dengan melakukan transformasi berdasarkan 3 pilar yaitu:

1. *Digital*, yaitu pengembangan produk digital baik dari sisi *lending* dan *saving* secara *end-to-end* sebagai aspirasi *digital attacker* BRI Group,
2. *Digitize*, yaitu proses bisnis *digitalization* yang merupakan pengembangan bisnis yang dilakukan secara *O2O (online to offline)*,
3. *Revamp*, yaitu penataan kembali bisnis yang telah ada yang difokuskan pada *shifting portfolio*, *revamp branch*, mengoptimalkan efisiensi proses bisnis dan memperkuat *people & culture*.

Kinerja Bank mengalami perlambatan dikarenakan upaya Bank untuk menata kembali portofolio bisnisnya menjadi fokus pada pengembangan bisnis digital. Untuk itu, Bank telah menyiapkan langkah-langkah antisipasi pada tahun 2021 untuk membawa bank kembali ke tingkat yang lebih sehat. Harapannya mulai tahun 2022 Perseroan telah siap sepenuhnya memasuki era bisnis digital.

Strategi Digital yang dilakukan Bank adalah dengan melakukan pengembangan produk digital baik untuk pendanaan maupun kredit.

Bank Raya's 2021 Strategic Plan

Bank Raya's Business Model

Bank Raya will develop an operating model for the bank in 2021 that will include three major components: classification, coordination, and collaboration. The first section, titled "Classification," is divided into two sections: "Expansion Business" and "Legacy Business." The Expansion Business is responsible for the development of Bank Raya's digital products, such as *Raya Digital Savings* and *Pinang*. While Legation is the management of Bank Raya's existing business with the objective of preserving asset quality and maximising recovery,

The second section, Coordination, is composed of four Bank Raya function groups: *Technology*, *Support*, *Product & Services*, and *Sales*. Bank Raya's four function groups each have a distinct role and work cooperatively to produce financial and non-financial outputs. The third component, collaboration, entails the implementation of agile methodology in the form of *Tribe* and *Squad* at Bank Raya in order for the bank's four function groups to coordinate in a structured manner in order to achieve targets. At the moment, Bank Raya is home to four tribes: *Tribe Pinang (Digital Lending)*, *Tribe Raya (Digital Saving)*, *Tribe Legacy*, and *Tribe National Sales*.

Aspirations of Bank Raya

Bank Raya aspires to be the world's best digital bank by becoming a hub for fintech and the gig economy. The Board of Directors' strategic policy for 2021 is to support the bank's business model transformation programme. Bank Raya's strategy for 2021, in line with the transformation plan, is to undergo a three-pillared transformation. These are:

1. *Digital*, specifically the development of end-to-end digital products for lending and saving as the BRI Group attackers' digital aspirations.
2. *Digitize*, specifically the business process of digitalization, which is a form of business development carried out by *O2O (online to offline)*.
3. *Revamp*, which means realigning existing businesses with a focus on portfolio realignment, branch revitalization, process optimization, and people and culture strengthening.

The bank's performance slowed as it worked to reorganise its business portfolio in order to focus on digital business development. To that end, the bank has planned proactive steps in 2021 to restore the bank's health. The company hopes to be fully prepared to enter the digital business era by 2022.

The bank's Digital Strategy calls for the development of digital products for both funding and credit. Bank Raya pioneered the

Bank Raya melakukan inisiasi pengembangan produk simpanan Digital Saving untuk memacu peningkatan jumlah CASA (*Current Account Saving Account*). Porsi CASA yang bertujuan untuk efisiensi *cost of fund* akan dapat menunjang kinerja Bank secara jangka panjang.

Dalam penyaluran kredit, Bank Raya melakukan pengembangan dan penyaluran produk pinjaman (*digital lending*) Pinang Performa dan Pinang Maksima dengan target pasar yaitu ekosistem *gig economy workers* dan ekosistem bisnis dengan menjadi *aggregator* yang akan menghubungkan seluruh *supply chain* bisnis di sektor tersebut mulai dari *merchant* sampai dengan *supplier*. Selain itu, Bank juga fokus untuk menggarap produk pinjaman Digital Konsumer (Pinang Fleksi) dengan target pasar *captive market* dan melakukan partnership dengan *fintech* sebagai *entry gateway* kerjasama Bank Raya dengan *fintech* (Pinang Connect).

Strategi *Digitize* yang ditempuh Bank, agar dapat melakukan penetrasi terhadap ekosistem adalah melalui kolaborasi dan kerjasama dengan pihak ketiga, baik Institusi, *Startup*, *Fintech*, *Ecosystem Player*, dll. Langkah ini merupakan *lead acquisition* dalam upaya memperluas akses pemasaran produk digital Bank dan untuk mendukung *value proposition* Bank Raya. Tahun 2021, Bank Raya juga melakukan inisiasi pengembangan produk dan layanan *beyond banking* melalui kerjasama dengan pihak ketiga. Untuk meningkatkan kualitas aset, Bank Raya juga melakukan strategi *revamp* terhadap bisnis *legacy* melalui pengalihan portofolio bisnis kepada pihak ketiga melalui skema *take over* dan skema lainnya sesuai kesepakatan kedua belah pihak. Untuk itu, langkah antisipatif Bank Raya agar memiliki *coverage* yang cukup, kami membentuk pencadangan dalam jumlah yang relatif besar.

Tantangan yang Dihadapi

Tantangan utama yang dihadapi Bank Raya dalam proses transformasi menjadi *digital banking* adalah berasal dari faktor eksternal dan internal. Dari faktor eksternal, Bank menghadapi beberapa tantangan akibat Pandemi Covid-19 yaitu (1) etika dan kepercayaan, dimana bank akan berada dibawah pengawasan yang lebih ketat sebagai respon dari pandemi, (2) penyesuaian portofolio yang dipicu oleh *rebalancing* penerimaan sektoral, (3) mendapatkan arus transaksi baru, sebagai dampak dari diversifikasi rantai pasokan global, (4) meningkatnya daya saing dari perusahaan jasa keuangan non bank, (5) perubahan bisnis model untuk mengadaptasi kemunculan ekonomi tanpa tatap muka, (6) migrasi ke lingkungan pekerjaan yang fleksibel dan cepat dengan kendala peraturan yang ada, (7) bank harus mengidentifikasi model risiko baru karena pandemi telah mengubah perilaku sektor, (8) permintaan terhadap pembiayaan yang menurun meskipun kebutuhan likuiditas terpenuhi, dan (9) produktivitas bank yang menurun karena *margin* yang tertekan namun bank juga harus melindungi lapangan pekerjaan di berbagai sisi.

development of digital savings products in order to increase the number of CASA members (current account savings accounts). The portion of CASA devoted to cost-of-funds efficiency will be able to support the bank's long-term performance.

Bank Raya develops and distributes Pinang Performa and Pinang Maksima loan products (digital lending) with the target market being the gig economy workers' ecosystem and business ecosystem, by becoming an aggregator that connects the entire business supply chain in the sector between merchants and suppliers. It also wants to make digital loan products for consumers (Pinang Flexi) with a captive market and work with fintech to start Bank Raya's collaboration with fintech (Pinang Connect).

The bank's digitisation strategy is based on collaboration and cooperation with third parties, including institutions, start-ups, fintech, and ecosystem players. This step is about acquiring leads in order to increase access to the bank's digital product marketing and to bolster the Bank Raya value proposition. Bank Raya will also begin developing non-traditional banking products and services in collaboration with third parties in 2021. Bank Raya also employs a revamp strategy for legacy businesses, transferring business portfolios to third parties via take-over, and other agreements between the parties. As a precautionary measure to confirm that Bank Raya has adequate coverage, we established a sizable reserve.

Obstacles

External and internal factors are the primary impediments to Bank Raya's transformation to digital banking. External factors include the following: (1) ethics and trust, where banks will face increased supervision in response to the pandemic, (2) portfolio adjustments triggered by sectoral revenue rebalancing, (3) gaining new transaction flows as a result of diversifying global supply chains, (4) increasing the competitiveness of non-bank financial services companies, and (5) changing business models to adapt to emerging economies, (6) migration to a flexible work environment and quickly with existing regulatory constraints, (7) banks must identify new risk models because the pandemic has changed the behaviour of the sector, (8) decreased demand for financing even though liquidity needs are met, and (9) bank productivity declines due to depressed margins but banks must also protect jobs on all sides.

Tantangan yang berasal dari faktor internal, adalah kesiapan sumber daya manusia untuk mendukung proses transformasi ini menjadi hal yang sangat penting. Untuk itu, di tahun 2021 Bank melakukan *assessment (Digital Competencies)* kepada seluruh Pekerja dalam rangka melakukan *replacement* Pekerja untuk mengisi struktur organisasi Bank yang baru.

Untuk menghadapi tantangan tersebut, Bank juga melakukan inisiasi implementasi organisasi digital melalui *Strategic Business Unit (SBU)*, serta mempersiapkan *digital talent* melalui *external hiring*, *optimizing existing talent* melalui *assessment*, *retrain* dan *reskill*.

Selain itu, tantangan yang harus dihadapi secara internal karena Bank juga melakukan proses transformasi terhadap aspek lainnya seperti *Network*, *Infrastructure*, *Model Bisnis*, *Produk* dan *Layanan*, serta *Portofolio Kredit* baik dalam hal *ticket size* maupun kualitas.

Kinerja Bank Raya Tahun 2021

Di tengah berbagai tantangan yang dihadapi, tahun 2021 kinerja Bank mengalami perlambatan. Penurunan kinerja yang dibukukan Bank di tahun 2021 merupakan bagian dari proses transformasi yang dijalankan Bank. Langkah transformasi ini tetap memperhatikan *good corporate governance*, pengelolaan manajemen risiko dan persyaratan kecukupan pemenuhan modal minimum yang ditetapkan oleh regulator.

Terlepas dari kinerja yang cenderung mengalami penurunan dibandingkan tahun 2020, namun secara umum Bank Raya masih dapat menjalankan fungsi intermediasi dengan baik. Sepanjang tahun 2021, Kredit yang diberikan Bank tercatat sebesar Rp11.608 miliar, mengalami penurunan sebesar 40,45% dibandingkan tahun sebelumnya Rp19.492 miliar. Penurunan jumlah kredit yang diberikan ini merupakan bagian dari proses transformasi Bank, dimana Bank lebih fokus pada penyaluran kredit digital menunjukkan pertumbuhan yang cukup baik. Pada tahun 2021, penyaluran kredit digital mencapai sebesar Rp488 miliar, meningkat 604,58% dibandingkan tahun sebelumnya yang dikontribusi melalui pinjaman digital melalui *partnership* (Pinang Connect) dan pinjaman digital Pinang Flexi.

Dana pihak ketiga (DPK) yang dihimpun Bank Raya mencapai Rp13.496 miliar, lebih rendah dibandingkan tahun 2020 sebesar Rp22.995 miliar. Penurunan ini terutama disebabkan oleh adanya penurunan simpanan nasabah yang disebabkan oleh *transfer of branch* atau pengalihan dana kepada BRI sebagai induk usaha atau pihak ketiga yang bertujuan untuk mengurangi dana institusi yang berbiaya mahal. Selain itu, ekspansi perusahaan menjadi bank digital, sehingga tidak melakukan ekspansi kredit eksisting yaitu kredit menengah dan kredit dengan plafon di atas Rp 1 miliar, dalam rangka penyaluran portofolio aset dan liabilitas.

Internal factors pose a challenge in terms of human resource readiness to support this critical transformation process. As a result, in 2021, the Bank will conduct an assessment (Digital Competencies) of all employees in order to replace those who are no longer needed to fill the Bank's new organisational structure.

To address these issues, the Bank has also begun the process of establishing a digital organisation through the Strategic Business Unit (SBU), as well as preparing digital talent through external hiring and optimising existing talent through assessment, retraining, and reskilling.

Additionally, challenges must be overcome internally, as the Bank is transforming other aspects of its business, including its network, infrastructure, business models, products and services, and credit portfolios, both in terms of ticket size and quality.

The Performance of Bank Raya in 2021

In the face of numerous challenges, the bank's performance will deteriorate in 2021. The bank's performance decline in 2021 is a result of the bank's transformation process. This transformation step keeps an eye on good corporate governance, risk management, and the minimum capital adequacy requirements set by the regulators.

Apart from its declining performance relative to 2020, Bank Raya continues to perform well in terms of intermediation. Loans provided by the bank totalled IDR 11,608 billion in 2021, a decrease of 40.45% from the previous year's IDR 19,492 billion. The decrease in loan volume is part of the bank's transformation process, in which the bank is concentrating its efforts on digital lending in order to avoid expanding its legacy business and instead focus on developing digital products. Credit disbursement via Digital credit disbursement grew at a healthy clip. In 2021, digital credit disbursement reached IDR 488 billion, an increase of 604.58% over the previous year, fueled by digital loans through partnerships (Pinang Connect) and digital loans through Pinang Flexi.

Third party funds (DPK) collected by Bank Raya totalled IDR 13,496 billion, down from IDR 22,995 billion in 2020. This decline was primarily due to a decline in customer deposits as a result of branch closures or transfers of funds to BRI as the holding company or to a third party in order to reduce the cost of institutional funds. In addition, the company's move to become a digital bank will keep it from expanding existing loans, especially medium-sized loans and loans with a ceiling of more than IDR 1 billion. This is to make sure that the company's asset and liability portfolios match up.

Namun demikian, penurunan kinerja ini adalah sudah direncanakan sesuai dengan Rencana Bisnis Bank. Dimana penurunan *outstanding* kredit yang diberikan tersebut berdampak pada menurunnya pendapatan bunga Bank, yaitu menjadi Rp1.647 miliar, dari tahun sebelumnya Rp1.932 miliar. Penurunan beban bunga sebesar Rp774 miliar, dari tahun sebelumnya Rp1.307 miliar menunjukkan bahwa Bank telah melakukan efisiensi dari sisi *cost of fund*. Laba Operasional Sebelum CKPN atau *Pre-Provisioning Operating Profit* (PPOP) masih tumbuh sebesar 53,18% (yoy) yaitu menjadi Rp582 miliar dari sebelumnya Rp380 miliar. Hal ini menunjukkan bahwa secara bisnis perbankan, Bank masih tumbuh untuk melakukan ekspansi. Hanya saja, dikarenakan adanya transformasi yang dijalankan perusahaan, maka kenaikan pembentukan cadangan dilakukan signifikan. Hal ini membuat profitabilitas Bank Raya tahun 2021 mengalami penurunan yang cukup tajam. Tahun 2021, Bank Raya membukukan rugi bersih sebesar Rp3.046 miliar.

Penurunan profitabilitas Bank Raya tahun 2021 utamanya disebabkan tingginya pencadangan yang dibentuk Bank di tahun 2021, yaitu sebesar Rp3.885 miliar. Tingginya pencadangan tersebut ditujukan untuk *shifting* portfolio bisnis yang semula fokus di bisnis segmen menengah, kemudian berpindah ke bisnis digital. Untuk itu diperlukan *coverage* yang cukup atas kredit dengan kualitas rendah.

Pada tahun 2021, Bank juga telah melaksanakan *corporate action* dengan melakukan penerbitan saham melalui Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (HMETD). Hal ini bertujuan untuk penguatan permodalan terutama sebagai modal kerja Perseroan dalam rangka penyaluran dana berbentuk kredit berbasis digital. Hal ini selaras untuk memenuhi ketentuan regulator dalam pemenuhan modal inti minimal Rp2 triliun pada akhir tahun 2021. Melalui penerbitan saham tersebut, pemegang saham menyerap secara optimal lembar saham baru yang diterbitkan sebanyak 1.054.545.185 (satu miliar lima puluh empat juta lima ratus lima puluh empat lima ribu seratus delapan puluh lima) saham dengan harga pelaksanaan sebesar Rp1.100,- (seribu seratus Rupiah) per saham. Hasil perolehan dana dari HMETD, Bank memperoleh dana sebesar Rp1.159.999.703.500 (satu triliun seratus lima puluh sembilan miliar sembilan ratus sembilan puluh sembilan juta tujuh ratus tiga ribu lima ratus Rupiah).

Perbandingan Target dan Realisasi

Kendati kinerja Bank Raya tahun 2021 secara umum mengalami penurunan dibandingkan tahun sebelumnya, namun kinerja tersebut secara umum berada di atas target yang ditetapkan dalam Revisi Rencana Bisnis Bank (RBB) 2021.

However, this performance decline was anticipated in the bank's business plan. Whereas the decline in outstanding loans has had an effect on the bank's interest income, which has decreased to IDR 1,647 billion from IDR 1,932 billion the previous year. The bank's cost of funds decreased by IDR 774 billion, from IDR 1,307 billion the previous year, indicating that the bank improved its cost of funds efficiency. Operating Profit Prior to CKPN, also known as Pre-Provisioning Operating Profit (PPOP), increased 53.18% year on year to IDR 582 billion, up from IDR 380 billion previously. This demonstrates that the bank is still expanding its banking business. However, as a result of the company's transformation, the reserve formation increased significantly. This results in a significant decline in Bank Raya's profitability in 2021. Bank Raya reported a net loss of IDR 3,046 billion in 2021.

Bank Raya's profitability declined in 2021, primarily as a result of the bank's large reserves, which totalled IDR 3,885 billion in 2021. The large reserves are aimed at diversifying the company's business portfolio, which was initially focused on the middle market but has since shifted to the digital space. As a result, adequate coverage of subprime credit is required.

Additionally, in 2021, the bank took corporate action by issuing shares via a Capital Increase with Pre-emptive Rights (HMETD). This is intended to strengthen capital, particularly as working capital for the company in connection with the distribution of funds via digital-based credit. This is consistent with the regulator's requirement that banks maintain a minimum core capital of IDR 2 trillion by the end of 2021. Through the issuance of these shares, shareholders will optimally absorb 1,054,545,185 (one billion fifty-four million five hundred five) new shares. forty-four thousand one hundred eighty-five) shares with an exercise price of IDR 1,100,- (one thousand one hundred rupiah) per share. The Bank obtained funds totalling IDR 1,159,999,703,500 through the exercise of pre-emptive rights (one trillion one hundred fifty-nine billion nine hundred ninety-nine million seven hundred three thousand five hundred Rupiah).

Comparison of Objectives and Achievements

While Bank Raya's performance in 2021 was generally lower than the previous year, it was generally higher than the target set in the Bank's Revision of the Business Plan (RBB) 2021.

Uraian Description	RBB 2021 RBB 2021	Realisasi 2021 2021 Realisation	Pencapaian RBB RBB Achievements (%)
Aset (Rp miliar) Assets (IDR billion)	16.359	16.867	103,10%
Kredit yang Diberikan (Rp miliar) Loans Disbursed (IDR billion)	12.608	11.608	92,07%
Dana Pihak Ketiga (Rp miliar) Third Party Funds (IDR billion)	13.704	13.496	98,48%
Laba Bersih (Rp miliar) Net Profit (IDR billion)	(3.320)	(3.046)	109,02%
NPL Gross (%)	4,39%	3,98%	110,29%
NIM (%)	3,18%	3,87%	121,63%
ROA (%)	(14,85%)	(14,75%)	100,70%
ROE (%)	(103,59%)	(95,44%)	108,54%
BOPO (%)	295,78%	287,86%	102,75%
CAR (%)	15,19%	20,24%	133,19%

Komitmen Penerapan Keuangan Berkelanjutan

Sebagai korporasi yang tumbuh dan berkembang di Indonesia, Bank Raya mendukung sepenuhnya penerapan keuangan berkelanjutan sebagaimana diatur dalam Peraturan OJK No.51/ POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten dan Perusahaan Publik.

Bagi Bank, makna keuangan berkelanjutan adalah memberikan solusi keuangan yang inklusif termasuk pembiayaan berkelanjutan dan layanan keuangan yang inklusif, serta menerapkan nilai-nilai keuangan berkelanjutan secara sistematis dan komprehensif pada seluruh operasinya sekaligus memberikan layanan jasa keuangan yang berdasarkan prinsip-prinsip keuangan berkelanjutan untuk meningkatkan nilai bagi pemangku kepentingan.

Langkah nyata dan dukungan Bank Raya terhadap penerapan keuangan berkelanjutan adalah Perusahaan menyusun Rencana Aksi Keuangan Berkelanjutan (RAKB) yang telah dilakukan sejak tahun 2019. RAKB berisi program-program strategis dan prioritas yang selaras dengan prinsip keuangan berkelanjutan. Tujuan RAKB Bank Raya sampai dengan tahun 2025 adalah meningkatkan daya tahan dan daya saing Bank dalam menghadapi tantangan dunia perbankan yang semakin dinamis. Mengingat bahwa era perkembangan teknologi semakin canggih, visi Bank Raya ke depannya akan menjadi *Digital Attacker* dengan tetap berorientasi pada pembangunan berkelanjutan (*Sustainable Development Goals/SDGs*) baik dari sisi aset (*assets*), kewajiban (*liabilities*), serta operasional dan sumber daya manusia (*SDM*).

Commitment to Sustainable Finance Implementation

According to FSA Regulation No. 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies, Bank Raya fully supports the implementation of sustainable finance, as defined in the regulation.

The Bank defines sustainable finance as the provision of inclusive financial solutions, including sustainable financing and inclusive financial services, as well as the systematic and comprehensive application of sustainable finance values throughout its operations in order to increase value through financial services based on sustainable finance principles pertaining to stakeholders.

The true first step of Bank Raya's support for sustainable finance is the preparation of the Sustainable Finance Action Plan (RAKB), which has been implemented since 2019. The RAKB contains strategic and priority programmes that adhere to sustainable finance principles. Bank Raya's RAKB until 2025 aims to strengthen the bank's resilience and competitiveness in the face of an increasingly dynamic banking environment. Given the increasing sophistication of technological development, Bank Raya's future vision is to become a "Digital Attacker" while remaining committed to sustainable development (Sustainable Development Goals/SDGs) in terms of assets, liabilities, operations, and human resources. HR).

Tahun 2021, Bank Raya telah memberikan dukungan menyeluruh untuk menciptakan pertumbuhan ekonomi berkelanjutan dengan menyelaraskan kepentingan ekonomi, sosial, dan lingkungan hidup.

Prospek Usaha Bank Raya

Proses pemulihan ekonomi Indonesia dari dampak pandemi Covid-19 diprediksi akan berjalan lebih baik di tahun 2022. Pemerintah berkomitmen untuk melanjutkan program PEN agar ekonomi nasional dapat segera pulih sehingga pembangunan nasional dapat kembali ke jalur yang semestinya.

Berkaca pada pertumbuhan ekonomi di tahun 2021, Bank Indonesia memprediksi pertumbuhan ekonomi Indonesia tahun 2022 akan terus meningkat. BI memprediksi pertumbuhan ekonomi tahun 2022 akan berada pada kisaran 4,7% - 5,5%. Dengan pertumbuhan ekonomi tersebut, lapangan kerja baru juga akan tercipta, termasuk di sektor *gig economy* juga akan mengalami pertumbuhan yang sangat pesat.

Bank Raya sangat optimis menghadapi tahun 2022. Karena itu, Bank akan terus melakukan perbaikan internal agar dapat memberikan pelayanan terbaik bagi nasabah. Bank Raya akan memperkuat infrastruktur teknologi agar dapat beroperasi sebagai Bank Digital secara penuh. Bank akan mengadopsi teknologi terkini dan berkolaborasi dengan ekosistem BRI Group untuk meningkatkan daya saing di tengah persaingan yang semakin meningkat.

Bank Raya akan terus mengembangkan *digital ecosystem* dengan target *market Gig Economy* melalui pendekatan komunitas. Salah satu upaya Bank untuk masuk ke *digital ecosystem* dimulai dengan aktif melakukan kolaborasi dengan beberapa *Fintech*. Sehingga dari hasil kolaborasi tersebut, Bank dapat melakukan *mapping* potensi komoditas atau sektor unggulan yang menggunakan *Fintech* sebagai pembiayaan.

Sejalan dengan langkah tersebut, Bank Raya juga akan memperkuat aspek sumber daya manusia untuk mendukung proses transformasi Bank. Perekrutan *digital talent*, akan terus dijalankan agar Bank semakin siap menghadapi era disrupsi teknologi ini.

Penerapan Tata Kelola Perusahaan

Bank Raya memiliki komitmen yang tinggi untuk menerapkan prinsip tata kelola perusahaan yang baik (GCG). Komitmen tersebut juga ditunjukkan oleh jajaran manajemen tertinggi di Bank, yaitu Dewan Komisaris dan Direksi. Bank memastikan seluruh kegiatan yang dijalankan oleh Dewan Komisaris, Direksi dan seluruh karyawan telah sesuai aturan dan kebijakan Bank serta kepatuhan terhadap peraturan dan perundang-undangan yang berlaku.

Bank Raya has given a lot of help in 2021 to make sure that economic, social, and environmental interests all work together to make sure that the economy grows in a way that is good for everyone.

Bank Raya's Commercial Prospects

Indonesia's economic recovery from the impact of the Covid-19 pandemic is expected to proceed more smoothly in 2022. The government wants to keep going with the PEN programme in order to speed up the recovery of the country's economy and get the country's growth back on track.

Based on economic growth in 2021, Bank Indonesia forecasts that Indonesia's economic growth will continue to accelerate in 2022. According to BI, economic growth will range from 4.7% to 5.5% in 2022. New jobs will also be available because of this economic growth, including in the *gig economy*, which is also going to grow very quickly.

Bank Raya is extremely optimistic about the year 2022. As a result, the bank will continue to make internal improvements to ensure that customers receive the best service possible. Bank Raya will bolster its technology infrastructure in order to operate fully as a digital bank. The bank will leverage cutting-edge technology and collaborate with the BRI Group ecosystem to boost its competitiveness in an environment of growing competition.

Bank Raya will continue to build a digital ecosystem with a *gig economy* focus using a community-based approach. One of the bank's initiatives to enter the digital ecosystem is to collaborate actively with several *fintech* companies. As a result of this collaboration, the bank will be able to map the potential of commodities or leading sectors that finance themselves through *Fintech*.

Bank Raya will also strengthen its human resource capabilities to aid in the bank's transformation process. Recruitment of *digital talent* will continue to be a priority in order to better prepare the bank for this era of technological disruption.

Corporate Governance in Practice

Bank Raya is committed to adhering to the principles of good corporate governance (GCG). The bank's highest levels of management, namely the Board of Commissioners and the Board of Directors, also demonstrate this commitment. The Bank makes sure that the activities of the Bank's Board of Commissioners, Directors, and employees are done in accordance with the Bank's rules and policies and with any laws and regulations that are in place.

Bank Raya juga terus berupaya untuk meningkatkan kualitas penerapan GCG. Salah satu langkah yang dilakukan adalah dengan melakukan *assessment* GCG setiap semester yaitu posisi Juni dan Desember. *Assesment* dilakukan dengan cara menyusun analisis kecukupan dan efektivitas penerapan tata kelola yang dilakukan secara komprehensif dan terstruktur pada aspek *governance structure*, *governance process* dan *governance outcome*.

Hasil *assessment* penerapan tata kelola pada tahun 2021 dinilai Baik. Walaupun terdapat beberapa kelemahan yang perlu mendapat perhatian, namun secara umum kelemahan tersebut kurang signifikan dan dapat dilakukan perbaikan.

Selain itu, sebagai bagian dari penerapan GCG, Bank juga telah menerapkan aspek manajemen risiko dengan baik. Tahun 2021, untuk mengantisipasi tantangan domestik dan global serta pandemi Covid-19 yang dapat meningkatkan eksposur risiko, dimana Bank perlu mengambil langkah strategis secara cepat dalam mengadaptasi kondisi tersebut dengan tetap memelihara dan mengendalikan risiko serta permodalan yang ada dalam upaya mendukung pencapaian, pertumbuhan dan mempertahankan kinerja secara berkelanjutan sekaligus meningkatkan daya saing Bank.

Pengelolaan manajemen risiko perlu dilakukan secara terintegrasi dan searah dengan strategi /rencana bisnis. Pengelolaan manajemen risiko bersifat konservatif dan *forward looking* dengan tujuan untuk meminimalisasi risiko yang dihadapi bank serta mengoptimalkan nilai tambah bagi pemegang saham, mengelola modal secara komprehensif serta memastikan profitabilitas dan pertumbuhan bisnis yang berkelanjutan.

Bank juga telah menerapkan sistem pengendalian internal yang dilakukan melalui pengawasan melekat dengan prinsip *three lines of defence* dengan komitmen bersama. Pelaksanaan sistem pengendalian internal merupakan tugas dan tanggung jawab dari semua pihak yang terlibat dalam sistem pengendalian intern yang dituangkan dalam kebijakan dan prosedur yang menjelaskan tugas dan tanggung jawab masing-masing pihak.

Sistem pengendalian internal bertujuan untuk menciptakan budaya kepatuhan terhadap ketentuan, peraturan dan perundang-undangan, meningkatkan efektivitas dan efisiensi dalam pelaksanaan operasional bank, menciptakan ketersediaan data informasi yang dibutuhkan manajemen secara akurat, tepat waktu dan lengkap, menciptakan dan meningkatkan budaya risiko yang dapat meningkatkan kinerja perusahaan dan memberikan nilai tambah bagi organisasi secara menyeluruh dan berkesinambungan.

Tingkat Kesehatan Bank yang berada di peringkat 2 pada Tahun 2021 mencerminkan bahwa Bank telah mengimplementasikan pengelolaan profil risiko, penerapan GCG, Rentabilitas dan Permodalan yang mengkategorikan Bank berada dalam kondisi sehat. Predikat

Additionally, Bank Raya is committed to enhancing the quality of GCG implementation. One of the steps taken is to conduct a semester-by-semester GCG assessment, focusing on the June and December positions. The assessment is done by putting together a detailed and structured analysis of how well and how well governance is implemented in the areas of governance structure, governance process, and governance outcome.

The results of the assessment of governance implementation in 2021 are deemed satisfactory. While there are some problems that need to be fixed, they are usually small and can be fixed.

Additionally, as part of the GCG implementation, the bank properly implemented risk management aspects. In 2021, to anticipate domestic and global challenges, as well as the Covid-19 pandemic, that may increase risk exposure, the bank must take swift strategic steps to adapt to these conditions while managing risks and existing capital in order to support achievement, growth, and sustained performance in a sustainable manner while increasing the bank's competitiveness.

Risk management must be integrated and consistent with the strategy and business plan. Risk management is conservative and forward-looking, with the goal of minimising bank risks and optimising shareholder value while also effectively managing capital and ensuring profitability and sustainable business growth.

Additionally, the bank has implemented an internal control system that is supervised by internal auditors and is based on the principle of three lines of defence with shared accountability. The implementation of the internal control system is everyone's job, as set out in policies and procedures that outline each person's duties and responsibilities.

The internal control system's objectives are to foster a culture of compliance with applicable provisions, regulations, and laws; to enhance the effectiveness and efficiency of bank operations; to ensure the accurate, timely, and complete availability of information data required by management; and to foster and improve a risk culture capable of improving performance.

The bank's soundness level of 2 in 2021 indicates that it has implemented risk profile management, GCG implementation, profitability, and capital, all of which indicate that the bank is in good health. This is a desirable outcome, as the digital bank's

tersebut merupakan hasil yang patut dipertahankan, karena rencana transformasi Bank Digital dapat diimplementasikan sesuai dengan *roadmap* transformasi Bank.

Perubahan Komposisi Direksi

Komposisi Direksi Bank Raya tahun 2021 mengalami perubahan sesuai keputusan Rapat Umum Pemegang Saham Tahunan yang diselenggarakan pada tanggal 9 April 2021. RUPS memutuskan untuk memberhentikan dengan hormat Sdr. Ebeneser Girsang sebagai Direktur Utama dan Sdr. Herry Prayudi sebagai Direktur *Risk Management*.

Selain itu, RUPS juga mengubah nomenklatur Direksi Bank sebagai berikut:

transformation plan is compatible with the bank's transformation roadmap.

Changes in the Composition of the Board of Directors

The composition of Bank Raya's Board of Directors in 2021 has been altered by the Annual General Meeting of Shareholders scheduled for April 9, 2021. The GMS has decided to terminate Mr. Ebeneser Girsang's tenure as President Director and Mr. Herry Prayudi's tenure as Director of Risk Management on an honourable basis.

Additionally, the GMS altered the Bank's Board of Directors' nomenclature as follows:

Semula Before	Menjadi After
Direktur Operasional dan Keuangan Director of Operations and Finance	Direktur Keuangan dan Operasional Director of Finance and Operations
Direktur <i>Risk Management</i> Director of Risk Management	Direktur Enterprise Risk Management Compliance & Human Resource Director of Enterprise Risk Management Compliance & Human Resource
Direktur <i>Legal, Compliance & Human Capital</i> Director of Legal, Compliance & Human Capital	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding
Direktur Bisnis Director of Business	Direktur Digital Bisnis Director of Digital Business

RUPS juga memutuskan untuk mengangkat Sdr. Kaspar Situmorang sebagai Direktur Utama dan Sdr. Bhimo Wikan Hantoro sebagai Direktur Digital Bisnis, serta mengalih penugasan Sdr. Arif Wicaksono, semula Direktur Operasional dan Keuangan, menjadi Direktur Keuangan dan Operasional, Sdr. Ernawan, semula Direktur *Legal, Compliance & Human Capital*, menjadi Direktur *Enterprise Risk Management, Compliance & Human Resource* dan Sdr. Sigit Murtiyoso, semula Direktur Bisnis, menjadi Direktur Retail Agri dan Pendanaan. Dengan demikian, komposisi Direksi Bank Raya menjadi sebagai berikut:

The GMS also decided to appoint Mr. Kaspar Situmorang as President Director and Mr. Bhimo Wikan Hantoro as Director of Digital Business, and transferred the assignment of Mr. Arif Wicaksono, originally Director of Operations and Finance, became Director of Finance and Operations, Mr. Ernawan, originally Director of Legal, Compliance & Human Capital, became Director of Enterprise Risk Management, Compliance & Human Resource and Mr. Sigit Murtiyoso, originally Director of Business, became Director of Retail Agri and Funding. Accordingly, the composition of the Board of Directors of Bank Raya is as follows:

Direktur Utama President Director	Kaspar Situmorang
Direktur Keuangan dan Operasional Director of Finance and Operations	Arif Wicaksono
Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i> Director of Enterprise Risk Management, Compliance & Human Resource	Ernawan
Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	Sigit Murtiyoso
Direktur Digital Bisnis Director of Digital Business	Bhimo Wikan Hantoro

Atas nama Bank Raya, kami memberikan apresiasi dan ucapan terima kasih kepada Sdr. Ebeneser Girsang dan Sdr. Herry Prayudi atas dedikasi dan kontribusi yang diberikan selama menjabat sebagai Direksi Bank Raya.

Penutup

Bank Raya telah berhasil melalui tahun 2021 yang menjadi fase awal dari transformasi Bank dengan baik. Atas nama Direksi, kami menyampaikan terima kasih kepada seluruh Pekerja yang telah bekerja dengan semangat dan dedikasi. Tak lupa kami juga mengucapkan terima kasih kepada Dewan Komisaris atas nasihat dan rekomendasi yang diberikan.

Kami juga menyampaikan terima kasih yang tulus kepada para nasabah yang turut berkontribusi dalam perkembangan usaha Bank, Pemegang Saham yang secara konsisten memberi dukungan penuh untuk pengembangan Bank dari waktu ke waktu, serta kepada Regulator sebagai penentu kebijakan yang langsung berinteraksi dengan perbankan atas konsistensinya dalam usaha untuk mewujudkan perekonomian dan perbankan yang sehat.

We would like to express our appreciation and gratitude to Mr. Ebeneser Girsang and Mr. Herry Prayudi on behalf of Bank Raya for their dedication and contributions during their tenure as Bank Raya's Board of Directors.

Closing

Bank Raya has successfully completed the first phase of its transformation in 2021. On behalf of the Board of Directors, we would like to express our heartfelt to all employees who have worked with such zeal and dedication. Correspondingly, we want to thank the Board of Commissioners for their advice and recommendations.

Furthermore, we express our sincere gratitude to customers who have contributed to the bank's business development, shareholders who have consistently provided full support for the bank's development from time to time, and to Regulator as determinants of policies that directly affect banks for their consistency in efforts to foster a healthy economy and banking.

Jakarta, Maret/March, 2022

Atas Nama Direksi

On behalf of the Board of Directors



Kaspar Situmorang

Direktur Utama

President Director



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1. **Kaspar Situmorang**
Direktur Utama
President Director
2. **Arif Wicaksono**
Direktur Keuangan & Operasional
Director of Finance and Operations
3. **Ernawan**
Direktur Enterprise Risk Management,
Compliance and Human Resource
Director of Enterprise Risk Management,
Compliance and Human Resource
4. **Sigit Murtiyoso**
Direktur Retail Agri & Pendanaan
Director of Agri Retail & Funding
5. **Bhimo Wikan Hantoro**
Direktur Digital Bisnis
Director of Digital Business





Pernyataan Tanggung Jawab Laporan Tahunan dan Laporan Berkelanjutan 2021 oleh Dewan Komisaris dan Direksi

Kami yang bertanda tangan di bawah ini menyatakan bahwa semua informasi dalam Laporan Tahunan dan Laporan Berkelanjutan PT Bank Raya Indonesia Tbk tahun buku 2021 telah dimuat secara lengkap dan kami bertanggung jawab penuh atas kebenaran isi Laporan Tahunan dan Laporan Berkelanjutan Perseroan.

Demikian pernyataan ini dibuat dengan sebenarnya.

Jakarta, Maret 2022

Dewan Komisaris

Board of Commissioners



Budi Satria

Komisaris Utama

President Commissioner



Eko B. Supriyanto

Komisaris Independen

Independent Commissioner



Rina Sa'adah

Komisaris Independen

Independent Commissioner



Rama G. Notowidigdo

Komisaris Independen

Independent Commissioner



Achmad F. C. Barir

Komisaris

Commissioner



The Board of Commissioners and the Board of Directors have issued a statement of responsibility for the 2021 Annual Report and Sustainability Report

We, the signatories, hereby stated that all information contained in the 2021 Annual Report and Sustainability Report of PT Bank Raya Indonesia Tbk has been comprehensively presented and that we are fully accountable for the accuracy of the contents of the Company's Annual Report and Sustainability Report.

This statement is made truthfully.

Jakarta, March 2022

Direksi

Board of Directors

Kaspar Situmorang
Direktur Utama
President Director

Arif Wicaksono
Direktur Keuangan & Operasional
Director of Finance and Operations

Ernawan
Direktur Enterprise Risk Management,
Compliance and Human Resource
Director of Enterprise Risk Management,
Compliance and Human Resource

Sigit Murtiyoso
Direktur Retail Agri & Pendanaan
Director of Agri Retail & Funding

Bhimo Wikan Hantoro
Direktur Digital Bisnis
Director of Digital Business

/ BAB 3

PROFIL PERUSAHAAN COMPANY PROFILE





Identitas Perusahaan (C.2 ; 102-1; 102-3)

Company Identity (C.2 ; 102-1; 102-3)

	Nama Name	PT Bank Raya Indonesia Tbk
	Nama Panggilan Commercial Name	Bank Raya
	Bidang Usaha Business Line	Perbankan Banking
	Tanggal Pendirian Tanggal Pendirian	27 September 1989 September 27, 1989
	Dasar Hukum Pendirian Establishment Legal Basis	Akta Notaris Raden Soekarsono SH No. 27 tanggal 27 September 1989. Anggaran Dasar Bank telah disahkan oleh Menteri Kehakiman Republik Indonesia dengan Surat Keputusan No. C.2-10019.HT.01.01-TH.89 tanggal 28 Oktober 1989 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 96, Tambahan No. 3303, pada tanggal 1 Desember 1989. Deeds of Notary Raden Soekarsono, S.H., No. 27 dated September 27, 1989. The Bank's Articles of Association has been ratified by the Minister of Law of Republic of Indonesia under the Decree No. C.2-10019.HT.01.01-TH.89 dated October 28, 1989 and has been announced in the the Republic of Indonesia State Gazette No. 96, Appendix No. 3303 on December 1, 1989.
	Kepemilikan Saham Share Ownership	- PT Bank Rakyat Indonesia (Persero) Tbk – 85,72% - Masyarakat – 14,28% - PT Bank Rakyat Indonesia (Persero) Tbk – 85.72% - Public – 14.28%
	Modal Dasar Authorised Capital	Rp60.000.000.000,-
	Modal Ditempatkan Issued Capital	Rp2.274.652.671.200,-
	Kode Saham dan Obligasi Stock Code and Obligation	AGRO/AGRO JK
	Jumlah Pegawai Total Employees	881 Orang 881 people
	Alamat Kantor Pusat Head Office Address	Gedung Bank Raya Jl. Warung Jati Barat No. 139 Jakarta Selatan 12740
	Telepon Telephone	(021) 79199980, 80667600 (Hunting)
	Faksimile Facsimile	(021) 79199950
	Email Email	humas@bankraya.co.id
	Situs Perusahaan Website	https://www.bankraya.co.id
	Sekretaris Perusahaan Corporate Secretary	Hirawan Nur Kustono
	Email Informasi Information Email	humas@bankraya.co.id

	Facebook	Bank Raya		Contact Center	1500494		YouTube	bankraya
	Instagram	@bankraya		Twitter	@BankRaya		LinkedIn	PT Bank Raya Indonesia Tbk

Riwayat Singkat Perusahaan

Company In Brief



PT Bank Raya Indonesia Tbk selanjutnya disebut "Bank Raya" atau "Bank" didirikan oleh Dana Pensiun Perkebunan (Dapenbun) berdasarkan Akta No. 27 tanggal 27 September 1989 yang dibuat dihadapan Rd. Soekarsono, S.H., Notaris di Jakarta dengan nama PT Bank AGRO.

Pada akhir tahun 1989 Bank memperoleh izin usaha dari Menteri Keuangan sesuai Surat Keputusan Menteri Keuangan No. 1347/KMK.013/1989 dan Surat Keputusan Direktur Bank Indonesia No. 22/1037/Upps/PSbD tanggal 26 Desember 1989 dan mulai beroperasi secara komersial pada tanggal 8 Februari 1990.

Sejak awal pendiriannya, Bank fokus pada sektor agribisnis. Portofolio kredit Bank sebagian besar (antara 50% - 70%) disalurkan di sektor agribisnis, baik *on farm* maupun *off farm*.

Tahun 2003, Bank melakukan penawaran umum perdana di Bursa Efek Surabaya setelah mendapat persetujuan Bapepam-LK No. S-1565/PM/2003 tertanggal 30 Juni 2003. Pada saat yang bersamaan, Bank mengubah namanya menjadi PT Bank Agroniaga Tbk. Pada tahun 2007, saham Bank dengan kode saham AGRO sudah tercatat di Bursa Efek Indonesia.

Tahun 2006, Bank meningkatkan statusnya menjadi Bank Umum Devisa berdasarkan Surat Keputusan Gubernur Bank Indonesia No. 8/41/Kep.GBI/2006 tertanggal 8 Mei 2006.

PT Bank Raya Indonesia Tbk, henceforth referred to as "Bank Raya" or "Bank," was created by the Plantation Pension Fund (Dapenbun) on September 27, 1989 under the name PT Bank AGRO.

By the end of 1989, the Bank had secured a business licence from the Minister of Finance according to Ministerial Decree No. 1347/KMK.013/1989 and Director of Bank Indonesia Decree No. 22/1037/Upps/PSbD dated December 26, 1989, and had begun commercial operations on February 8, 1990.

The Bank has concentrated its efforts on the agro industry since its foundation. The majority of the Bank's loan portfolio (between 50% and 70%) is directed at agriculture, both on and off farm.

After having received clearance from Bapepam-LK No. S-1565/PM/2003 dated June 30, 2003, the Bank completed an initial public offering on the Surabaya Stock Exchange in 2003. Simultaneously, the Bank's name was changed to PT Bank Agroniaga Tbk. In 2007, the Bank's shares were listed on the Indonesia Stock Exchange under the ticker symbol AGRO.

The Bank was elevated to a Foreign Exchange Commercial Bank in 2006 according to the Governor of Bank Indonesia's Decree No.8/41/Kep.GBI/2006 dated May 8, 2006.

Pada tanggal 3 Maret 2011, PT Bank Rakyat Indonesia (Persero) Tbk (BRI) mengakuisisi sebagian besar saham milik Dapenbun, sehingga BRI menjadi pemegang saham pengendali. Tahun 2012 bersamaan dengan ulang tahun ke-23, Bank kembali berganti nama menjadi PT Bank Rakyat Indonesia Agroniaga Tbk, dengan nama komersial BRI Agro.

Bersama BRI, Bank semakin mantap melangkah dan melayani dengan setulus hati. Bank juga menjalin sinergi yang kuat dengan BRI, salah satunya seluruh nasabah Bank dapat menggunakan kartu ATM Bank tanpa dikenakan biaya di seluruh jaringan ATM BRI untuk segala jenis transaksi.

Pada tahun 2019, Perseroan melakukan terobosan dengan meluncurkan PINANG yang merupakan pinjaman berbasis digital dan sekaligus menjadi produk pinjaman bank berbasis aplikasi pertama melalui dukungan dari BRI. Sejalan dengan rencana BRI sebagai Pemegang Saham Pengendali melalui *corporate plan* BRI BRIVOLUTION 2.0 dimana Bank ditunjuk sebagai *digital attacker* BRI Group, maka pada tahun 2020 Bank sudah merencanakan melakukan transformasi digital yang diwujudkan melalui tiga pilar transformasi yaitu digital, *digitize* dan *revamp*. Selain merubah arah transformasi perusahaan, Bank juga merubah nama agar sejalan dengan visi misi yang baru.

Saat ini Bank telah mencanangkan aspirasi baru yaitu *"The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy"*. Dengan aspirasi ini, maka Perseroan akan bertransformasi dalam segala hal antara lain aspek *Human Capital, Network, Infrastructure, Model Bisnis, Produk dan Layanan*, serta Portofolio Kredit baik dalam hal *ticket size* maupun kualitas kredit. Perseroan berkomitmen untuk membangun pondasi keuangan yang kuat untuk *business model* yang baru dan fokus untuk menyalurkan pendanaan berbasis digital kepada segmen *market* yang baru, terutama segmen *Gig Economy*.

Pada tanggal 27 September 2021, RUPS menyetujui perubahan nama Bank menjadi PT Bank Raya Indonesia Tbk dan telah mendapatkan Penetapan Penggunaan Izin Usaha atas nama PT Bank Rakyat Indonesia Agroniaga Tbk menjadi izin usaha atas nama PT Bank Raya Indonesia Tbk dengan Salinan Keputusan Deputi Komisioner Pengawas Perbankan I OJK No. Kep-65/PB.1/2021 tanggal 1 November 2021 melalui Surat No. S-426/PB.12/2021 tanggal 5 November 2021. Selain itu, Bank telah menerima persetujuan atas perubahan logo dari OJK melalui Surat No. S-250/PB.31/2021 tanggal 9 November 2021 perihal Persetujuan Perubahan Logo Bank.

On March 3, 2011, PT Bank Rakyat Indonesia (Persero) Tbk (BRI) bought the majority of Dapenbun's shares, thereby becoming BRI the dominant stakeholder. In 2012, the Bank changed its name once again to PT Bank Rakyat Indonesia Agroniaga Tbk, with the commercial brand BRI Agro.

Together with BRI, the Bank is gradually progressing and providing sincere service. Additionally, the Bank benefits from a strong synergy with BRI, one of which is that all Bank clients may use their ATM card for free in all BRI ATM networks for all sorts of transactions.

Through assistance from BRI, the Company accomplished a milestone in 2019 with the introduction of PINANG, a digital-based credit product and the first application-based bank credit product. With BRI's plan as Controlling Shareholder, and the Bank's appointment as the BRI Group's digital attacker through the BRI BRIVOLUTION 2.0 corporate plan, the Bank has planned to carry out digital transformation in 2020, which will be realised through three transformation pillars, namely digital, digitalize, and revamp. Along with reorienting the company's development, the Bank renamed itself to reflect the new vision and goal.

The Bank has just unveiled a new vision, titled "The Best Digital Bank by Becoming a House of Fintech and a Home for the Gig Economy." To accomplish this goal, the Company will change in all areas, including human capital, network, infrastructure, business model, products and services, and credit portfolio, both in terms of ticket size and credit quality. The Company is dedicated to establishing a solid financial basis for a new business model and concentrating on new market areas, particularly the Gig Economy.

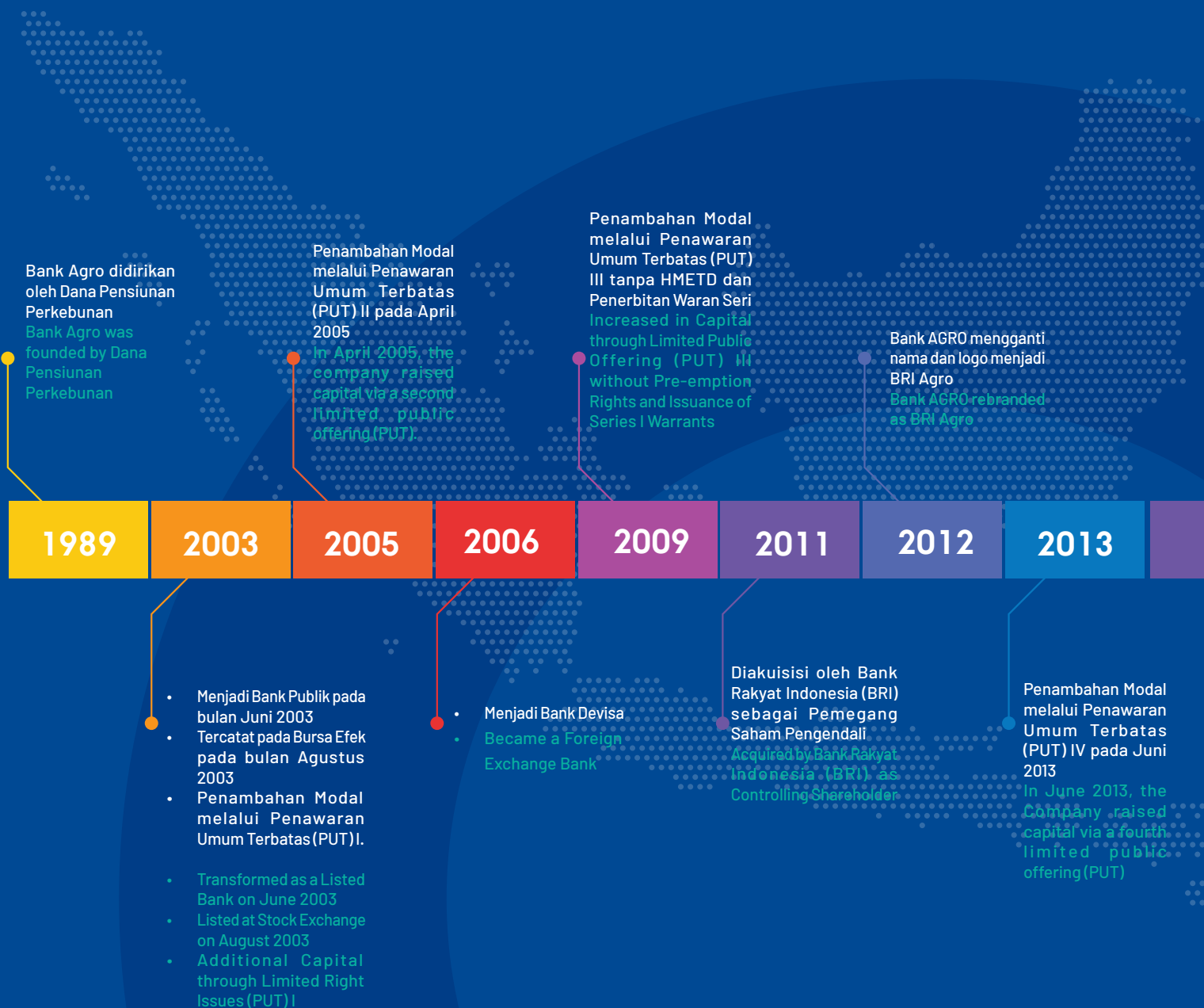
On September 27, 2021, the GMS approved the Bank's name change to PT Bank Raya Indonesia Tbk and obtained a determination on the use of a business licence on behalf of PT Bank Rakyat Indonesia Agroniaga Tbk to become a business licence on behalf of PT Bank Raya Indonesia Tbk via Letter No. S-426/PB.12/2021 dated November 5, 2021. Additionally, the Bank has acquired clearance from OJK to modify its logo through Letter No. S-250/PB.31/2021 dated November 9, 2021 Approval of Bank Logo Change.

Keterangan Perubahan Nama dan Status (C.6; 102-10)

Potrayal of Change of Name and Status (C.6; 102-10)

1989	Bank AGRO Akta Notaris Rd. Soekarsono, S.H., di Jakarta No. 27 tanggal 27 September 1989. Bank AGRO Notary Deed Rd. Soekarsono, S.H., in Jakarta No. 27 September 27, 1989
2003	PT Bank Agroniaga Tbk Persetujuan Bapepam-LK No. S-1565/ PM/2003 tertanggal 30 Juni 2003. PT Bank Agroniaga Tbk Bapepam-LK Approval No. S-1565/PM/2003 dated June 30, 2003.
2012	PT Bank Rakyat Indonesia Agroniaga Tbk Akta Pernyataan Keputusan Rapat No. 30 tanggal 16 Mei 2012 yang dibuat oleh Notaris Rusnaldy SH. PT Bank Rakyat Indonesia Agroniaga Tbk Deed of Statement of Meeting Resolutions No. 30 dated May 16, 2012 made by Notary Rusnaldy SH.
2021	PT Bank Raya Indonesia Tbk Akta Pernyataan Keputusan Rapat No. 24 tanggal 27 September 2021 dibuat dihadapan M. Nova Faisal, S.H., M.Kn., Notaris di Kota Administrasi Jakarta Selatan yang telah memperoleh persetujuan berdasarkan Surat Keputusan Menteri Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0052731.AH.01.02 Tahun 2021 tanggal 27 September 2021. PT Bank Raya Indonesia Tbk Deed of Statement of Meeting Resolutions No. 24 dated September 27, 2021 made before M. Nova Faisal, S.H., M.Kn., Notary in South Jakarta Administrative City which has obtained approval based on the Decree of the Minister of Law and Human Rights of the Republic of Indonesia No. AHU-0052731.AH.01.02 Year 2021 dated September 27, 2021.

Jejak Langkah Perusahaan Milestones



- Penambahan Modal melalui Penawaran Umum Terbatas (PUT) V pada Juni 2015 sehingga menjadi Bank Umum Kelompok Usaha kategori BUKU 2
- Implementasi *core Banking* baru BRIAGRONETS

Additional Capital through Limited Right Issues (PUT) V was completed in June 2015, elevating the bank to the TIER 2 level.

Implementation of new *core Banking* BRIAGRONETS

- Peningkatan Modal Dasar Bank menjadi Rp6 triliun
- Penambahan Modal melalui Penawaran Umum Terbatas (PUT) VII pada Juni 2017 dan Penerbitan Obligasi I pada Juni 2017.

- Bank Authorised Capital Increased to IDR 6 Trillion
- Additional capital was raised in June 2017 through a Limited Public Offering (PUT) VII and Bonds I.

Launching produk "Pinang" yang merupakan pinjaman berbasis digital dan sekaligus menjadi produk pinjaman bank berbasis aplikasi pertama di Indonesia.

Launched the "Pinang" product, Indonesia's first application-based bank loan.

2015

2016

2017

2018

2019

2021

- Penambahan Modal melalui Penawaran Umum Terbatas (PUT) VI dan Penerbitan Waran Seri II pada Desember 2016
- Peresmian dan relokasi Kantor Pusat ke Gedung BRI Agro
- Perubahan logo perusahaan menjadi lebih selaras dengan Perusahaan Induk

Capital Increase in December 2016 through a Limited Public Offering (PUT) VI and the issuance of Series II Warrants

- BRI Agro's Head Office Inaguration and relocation to BRI Agro's Building
- Modifications to the corporate logo to align it more closely with the Parent Company

Penambahan Modal melalui Penawaran Umum Terbatas (PUT) VIII pada Juni 2018

In June 2018, Capital Increase VIII through Limited Public Offering (PUT)

- BRI Agro mengganti nama dan logo menjadi Bank Raya
- Penambahan Modal melalui HMETD (PMHMETD) IX pada November 2021

- Bank Raya acquires the name and logo of BRI Agro
- In November 2021, Capital Increase by Pre-emptive Rights (PMHMETD) IX will be implemented.

Logo Perusahaan Company Logo



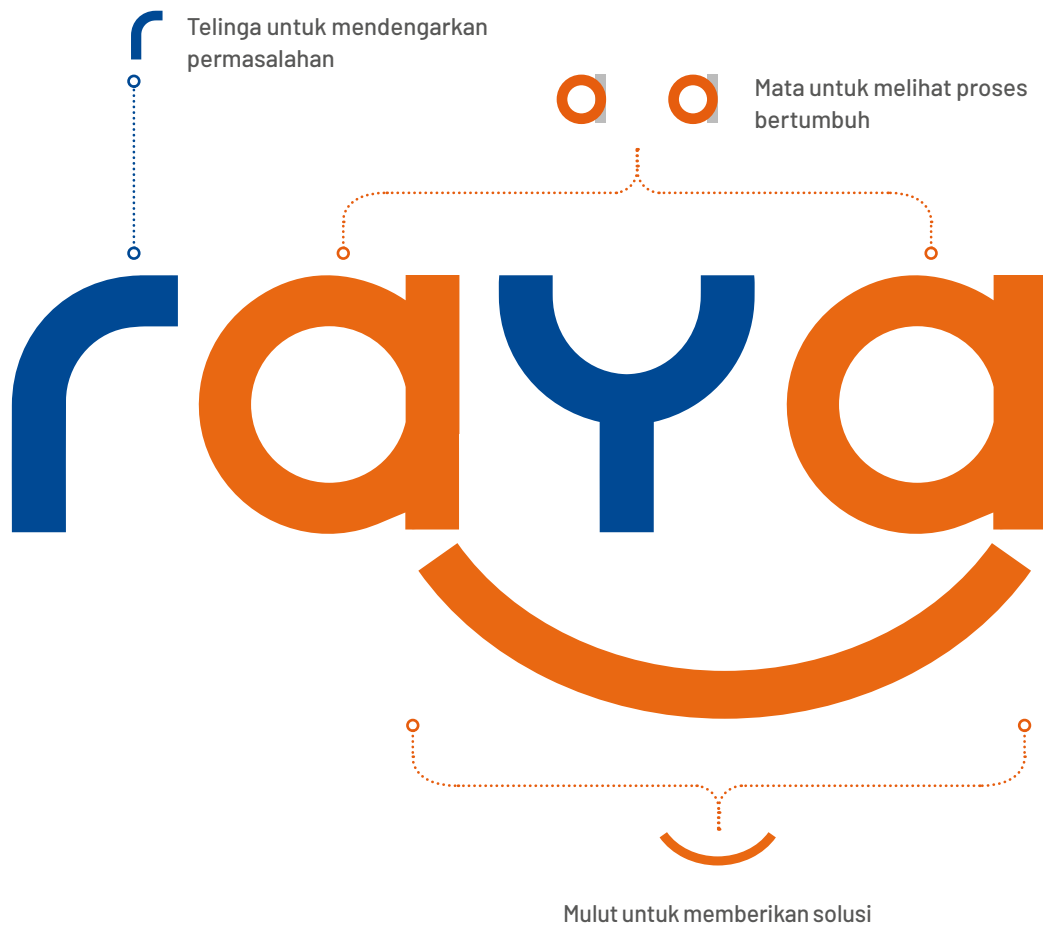
Perseroan telah diubah namanya dari PT Bank Rakyat Indonesia Agroniaga Tbk menjadi PT Bank Raya Indonesia Tbk berdasarkan Akta Pernyataan Keputusan Rapat No. 24 tanggal 27 September 2021 dibuat dihadapan M. Nova Faisal, S.H., M.Kn., Notaris di Kota Administrasi Jakarta Selatan yang telah memperoleh persetujuan berdasarkan Surat Keputusan Menteri Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0052731.AH.01.02 Tahun 2021 tanggal 27 September 2021 dan telah menerima Penetapan Penggunaan Izin Usaha atas nama PT Bank Rakyat Indonesia Agroniaga Tbk menjadi izin usaha atas nama PT Bank Raya Indonesia Tbk dengan Salinan Keputusan Deputy Komisiner Pengawas Perbankan I OJK No. Kep-65/PB.1/2021 tanggal 1 November 2021 melalui Surat No. S-426/PB.12/2021 tanggal 5 November 2021. Selain itu, Perseroan telah menerima persetujuan atas perubahan logo dari OJK melalui Surat No. S-250/PB.31/2021 tanggal 9 November 2021 perihal Persetujuan Perubahan Logo Bank.

The Company's name has been changed from PT Bank Rakyat Indonesia Agroniaga Tbk to PT Bank Raya Indonesia Tbk pursuant to the Deed of Meeting Resolutions No. 24 dated September 27, 2021 executed before M. Nova Faisal, S.H., M.Kn., Notary in South Jakarta Administrative City, which was approved pursuant to the Minister of Law and Human Rights of the Republic of Indonesia's Decree No. AHU-0052731.AH.01.02 of 2021 dated September 27, 2021 and has received the Determination of the Use of a Business License on behalf of PT Bank Rakyat Indonesia Agroniaga Tbk to become a business license on behalf of PT Bank Raya Indonesia Tbk with a copy of the Decree of the Deputy Commissioner for Banking Supervision I OJK No. Kep-65/PB.1/2021 dated November 1, 2021 through Letter No. S-426/PB.12/2021 dated November 5, 2021. Additionally, the Company gained clearance from OJK for the logo modification through Letter No. S-250/PB.31/2021 dated November 9, 2021 about Approval for Bank Logo Change.

Filosofi logo Bank Raya

The philosophy of Bank Raya's Logo

"Dengarkan, Sampaikan dan Lihat"



Bidang Usaha (GRI 102-2; GRI 102-7)(C.4)

Business Line (GRI 102-2; GRI 102-7)(C.4)

Sesuai dengan Anggaran Dasar Perusahaan tanggal Akta Pernyataan Keputusan Rapat No. 18 tanggal 27 April 2021, didalam pasal 3 ayat 1 dijelaskan mengenai maksud dan tujuan pendirian Perusahaan adalah untuk menjalankan kegiatan usaha dalam bidang Bank Umum.

According to the Company's Articles of Association dated the Deed of Statement of Meeting Resolutions No. 18 dated April 27, 2021, it is stated in article 3 paragraph 1 that the goal and objective of forming the Company is to engage in commercial banking operations.

Kegiatan Usaha Berdasarkan Anggaran Dasar Terakhir Business Activities Based on the Most Recent Articles of Association	Kegiatan usaha yang dijalankan pada tahun 2021 Business activities undertaken in 2021	
	Sudah Dijalankan Have Been Exercised	Belum Dijalankan Not Yet Exercised
Menghimpun dana dan masyarakat dalam bentuk simpanan berupa giro, deposito berjangka, sertifikat deposito, tabungan dan atau dalam bentuk lainnya yang dipersamakan dengan itu.	v	
Funds of the public are collected in the form of deposits, time deposits, certificates of deposit, savings, and/or other analogous instruments.		
Memberikan kredit atau menyediakan pembiayaan dan atau melakukan kegiatan berdasarkan prinsip syariah sesuai ketentuan yang ditetapkan Bank Indonesia dan atau instansi yang berwenang.	v	
Credit or financing and/or executing sharia-compliant operations in accordance with the rules set by Bank Indonesia and/or the approved agency.		
Membeli, menjual atau menjamin atas risiko sendiri maupun untuk kepentingan dan atas perintah nasabahnya.	v	
Purchasing, selling, or guaranteeing at their own risk or on behalf of and at the direction of their consumers.		
Surat-surat wesel termasuk wesel yang diakseptasi oleh Bank yang masa berlakunya tidak lebih lama dan kebiasaan dalam perdagangan surat-surat dimaksud;	v	
Promissory letters, including those approved by the Bank and those with a short validity term, as well as the customs associated with trading the aforementioned papers;		
1. Surat pengakuan hutang dan kertas dagang lainnya yang masa berlakunya tidak lebih lama dan kebiasaan dalam perdagangan surat-surat dimaksud; Debt acknowledgement and other commercial paper with a limited validity term, as well as the norms governing their trade;	v	
2. Kertas perbendaharaan negara dan surat jaminan Pemerintah State treasury papers and Government guarantees;	v	
3. Sertifikat Bank Indonesia Bank Indonesia Certificate;	v	
4. Obligasi Bonds	v	
5. Surat dagang berjangka waktu sampai dengan 1(satu) tahun Commercial papers with a term of up to 1(one) year	v	
6. Instrumen Surat Berharga lain yang berjangka waktu sampai dengan 1(satu) tahun Commercial papers with a term of up to 1(one) year	v	
7. Memindahkan uang baik untuk kepentingan sendiri maupun untuk kepentingan nasabah. Transferring money both for own interests and for the benefit of customers.	v	

Kegiatan Usaha Berdasarkan Anggaran Dasar Terakhir Business Activities Based on the Most Recent Articles of Association	Kegiatan usaha yang dijalankan pada tahun 2021 Business activities undertaken in 2021	
	Sudah Dijalankan Have Been Exercised	Belum Dijalankan Not Yet Exercised
8. Menempatkan dana pada, meminjam dana dari, atau meminjamkan dana kepada Bank lain, baik dengan menggunakan surat, sarana telekomunikasi maupun dengan wesel unjuk, cek atau sarana lainnya. Placing funds in, borrowing funds from, or lending funds to other Banks, either by using letters, telecommunications facilities or by drafts, checks or other means.	v	
9. Menerima pembayaran dan tagihan Surat Berharga dan melakukan perhitungan dengan atau antar pihak ketiga. Accepting Securities payments and bills and make calculations with or among third parties.	v	
10. Menyediakan tempat untuk menyimpan barang dan Surat Berharga. Providing a place to store goods and Securities.	v	
11. Melakukan penitipan untuk kepentingan pihak lain berdasarkan suatu kontrak. Performing safekeeping for the benefit of other parties based on a contract.	v	
12. Melakukan penempatan dana dan nasabah lainnya dalam bentuk Surat Berharga yang tidak tercatat di Bursa Efek. Placing funds and other customers in the form of Securities that are not listed on the Stock Exchange.		v
13. Membeli melalui pelelangan agunan baik semua maupun sebagian dalam hal debitur tidak memenuhi kewajibannya kepada Perseroan, dengan ketentuan agunan yang dibeli tersebut wajib dicairkan secepatnya. Buying through auction of collateral, either all or partly in the event that the debtor does not fulfill his obligations to the Company, provided that the collateral purchased must be disbursed as soon as possible.	v	
14. Melakukan kegiatan anjak piutang, usaha kartu kredit dan kegiatan Wali Amanat. Conducting factoring, credit card business and Trustee activities		v
15. Melakukan kegiatan valuta asing dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia dan atau instansi yang berwenang. Conducting foreign currency transactions in accordance with Bank Indonesia and/or the approved agency's regulations	v	
16. Melakukan kegiatan penyertaan modal pada Bank atau Perusahaan lain dibidang keuangan, seperti sewa guna usaha, modal ventura, Perusahaan Efek, Asuransi, serta lembaga kliring penyelesaian dan penyimpanan dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia dan atau instansi yang berwenang; Conducting capital participation in banks or other companies in the financial sector, such as leases, venture capital, securities companies, insurance companies, clearing and settlement clearing institutions, in compliance with the provisions stipulated by Bank Indonesia and or authorized institutions.;	v	
17. Melakukan kegiatan penyertaan modal sementara untuk mengatasi akibat kegagalan kredit, termasuk kegagalan pembiayaan berdasarkan prinsip syariah, atau kegagalan pembiayaan lain, dengan syarat menarik kembali penyertaannya, dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia dan atau instansi yang berwenang. Conducting temporary equity participation activities to overcome the consequences of credit defaults, including defaults based on sharia principles, or other financing failures, on condition that they withdraw their participation, by fulfilling the conditions stipulated by Bank Indonesia and or the competent authority.		v

Kegiatan Usaha Berdasarkan Anggaran Dasar Terakhir Business Activities Based on the Most Recent Articles of Association	Kegiatan usaha yang dijalankan pada tahun 2021 Business activities undertaken in 2021	
	Sudah Dijalankan Have Been Exercised	Belum Dijalankan Not Yet Exercised
18. Bertindak sebagai pendiri dana pensiun dan pengurus dana pensiun sesuai dengan ketentuan dalam peraturan perundang-undangan dana pensiun yang berlaku. Acting as the pension fund's creator and administrator in compliance with the appropriate pension fund law.		v
19. Melakukan kegiatan lain yang lazim dilakukan oleh Bank, sepanjang tidak bertentangan dengan ketentuan perundang-undangan yang berlaku. Conducting additional activities that the Bank often engages in, as long as they do not clash with the relevant legislation.	v	
20. Melakukan jasa keuangan <i>commercial banking</i> dan <i>investment banking</i> lainnya. Commercial banking and other investment banking financial services are performed.	v	

Produk dan Jasa

Products and Services

Jenis Produk Products	Uraian Exegesis
Tabungan Savings	Tabungan Raya (Rupiah) Raya Savings (Rupiah)
	TabunganKu TabunganKu Savings
	Tabungan Raya Infiniti Raya Infiniti Savings
	Tabungan Simpel Simpel Savings
	Tabungan Raya Multima Raya Multima Savings
Giro Current Accounts	Giro Raya (Rupiah) Raya Current Accounts (Rupiah)
	Giro Raya (Valas) Current Accounts (Foreign Exchange)
	Deposito Raya (Rupiah) Raya Time Deposit (Rupiah)
	Deposito Raya (Valas) RayaTime Deposit (Foreign Exchange)
	Deposito <i>On Call</i> (DOC) Time Deposit On Call (DOC)
Jenis Layanan Services	Uraian Exegesis
Layanan Perbankan Banking	Transaksi Ekspor/Impor Export/Import Transaction
	Transfer LLG dan RTGS LLG and RTGS Transfers
	Bank Garansi Bank Guarantee
	Kartu Kredit Credit Cards
	Surat Kredit Berdokumen Dalam Negeri Domestic Letter of Credit
	Transaksi Valas Foreign Currency Transaction
	Kliring Clearing
	Save Deposit Box
Layanan Treasury Treasury	Foreign Exchange Transaction (Tod, Tom, Spot & Forward)
Layanan E-Banking E-Banking Services	Internet Banking (Raya Mobile)
	Uang Elektronik BRIZZI (Co-branding BRI) Electronic Money BRIZZI (Co-branding BRI)
	Cash Management System (CMS) Raya
	Virtual Account
	Raya Digital

No	Jenis Kredit	Produk
1.	<i>Legacy (Recovery & Kualitas Kredit)</i>	
a.	Segmen Menengah	KI, KMK, Konstruksi, Rek. Koran, <i>Cash Collateral</i>
b.	Segmen Kredit Ritel	Ritel Komersil (KI, KMK, Konstruksi, Rek. Koran, <i>Cash Collateral</i>) Kredit Plasma & Program (Kredit Program KPEN RP, Kredit Program KKPE, Kredit Program KKPA Komersil)
c.	Segmen Konsumer	Kredit Pekerja Produktif, Kredit Pensiun, Kredit Agro Griya, Kredit Agro Griya, Kredit Agro Mobil, Kredit SHT (simpanan Hari Tua), Kredit Multiguna
d.	Kredit Plasma & Program	Kredit Program KPEN RP, Kredit Program KKPE, Kredit Program KKPA Komersil
2.	Digital (Ekspansi)	Pinang Connect, Pinang Maksima, Pinang Performa, Pinang Flexi, Pinang Paylater, Raya <i>Digital Saving</i>
3.	KUR	

Produk Digital Digital (Expansion)

pinang connect

Fasilitas pinjaman yang diberikan kepada *end user* melalui Platform P2P milik *partner*.

Fitur:

1. Penyaluran berdasarkan *digital loan origination*
2. *Dashboard real time* untuk *partner*

Plafon : Sampai dengan Rp1 miliar
Tenor : 1 bulan – 12 bulan

Lending facility which is given to customers who submit loan through Raya partner's P2P platform

Feature

1. Digital loan origination to disbursement*
2. Real time performance dashboard for partners*

Ticket Size : up to IDR 1 billion
Tenor : 1 month – 12 months

pinang maksima

Pinjaman digital yang dipasarkan secara *Online to Offline (O2O)* melalui *supply chain financing*.

Fitur:

1. Pencairan berdasarkan kontrak kerja (*invoice/PO*)
2. Pinjaman untuk Modal Kerja

Plafon : Rp100 juta s.d Rp1 Miliar
Tenor : 1 bulan – 12 bulan

Raya's digital lending which is marketed from online to offline (O2O) through supply chain financing.

Feature:

1. Need collateral (*invoice/PO*)
2. Working capital loan

Ticket Size : IDR 100 million – IDR 1 billion
Tenor : 1 month – 12 months

pinang performa

Pinjaman digital yang dipasarkan secara *Online to Offline (O2O)* melalui *supply chain financing*.

Fitur:

1. Pencairan berdasarkan kontrak kerja (*invoice/PO*)
2. Pinjaman untuk Modal Kerja

Plafon : Rp1 juta s.d Rp100 juta
Tenor : 1 bulan – 12 bulan

Raya's digital lending which is marketed from online to offline (O2O) through supply chain financing

Feature:

1. Need collateral (*invoice/PO*)
2. Working capital loan

Ticket Size : IDR 1 million – IDR 100 million
Tenor : 1 month – 12 months

pinang flexi

Merupakan pinjaman digital untuk segmen kredit konsumen yang disalurkan secara *end-to-end* menggunakan aplikasi

Fitur:

1. Tanpa agunan
2. Menggunakan e-KYC dan *digital signature*
3. Bisa ditanam pada *platform* agen

Plafon : Rp500 ribu s.d Rp25 juta
Tenor : 1 bulan - 12 bulan

Fully digitalized consumer loan from end-to-end through apps Pinang

Feature:

1. Without collateral
2. e-KYC & digital signature
3. Embedded in Agents Platform

Ticket Size : IDR 500 thousand - IDR 25 billion
Tenor : 1 month - 12 months

Paylater

powered by pinang flexi

Merupakan pinjaman digital untuk segmen kredit konsumen yang disalurkan secara *end-to-end* menggunakan aplikasi

Fitur:

1. Tanpa agunan
2. Menggunakan e-KYC dan *digital signature*
3. Bisa ditanam pada *platform* agen

Merupakan pinjaman digital untuk segmen kredit konsumen yang disalurkan secara *end-to-end* menggunakan platform partner (BRILink, Payfazz, dll).

Plafon : Rp5 juta s.d Rp25 juta
Tenor : 5, 14 dan 30 hari
Dana Talangan BRILink melayani Agen Juragan & Jawara

It is a digital consumer credit loan that is provided end-to-end through the use of an application.

Feature:

1. There is no collateral.
2. Electronic Know-Your-Customer (e-KYC) and digital signatures
3. It is possible to plant it on the agent platform.

It is a digital loan for consumer credit that is provided end-to-end through the use of partner platforms (BRILink, Payfazz, etc.).

Ticket Size : IDR 5 million to IDR 25 million
Tenor : 5, 14, and 30 days
Bailouts by BRILink benefit the Juragan & Jawara Agents



Aplikasi Raya merupakan produk tabungan digital dengan fitur:

1. Menggunakan e-KYC dan *digital signature*
2. Terdapat fitur *loyalty/gamification*
3. Dapat digunakan sebagai investasi
4. Terdapat *direct debit* untuk pembayaran *e-commerce*
5. Fitur-fitur pembayaran

Raya's digital savings account

- e-KYC & digital signature
- Loyalty/gamification
- Investment (Gold savings & pension fund)
- Direct debit for e-commerce
- Payment

Wilayah Operasional (GRI 102-4; GRI 102-6)(C.3)

Operational Area (GRI 102-4; GRI 102-6)(C.3)

Hingga akhir tahun 2021, jaringan kerja Perseroan tersebar di 13 Provinsi dan 17 kota besar di Indonesia. Bank melakukan terobosan dengan menginisiasi *community branch* untuk melayani komunitas ekonomi sektor informal (*gig economy*) dan agen-agen *fintech* guna membangun infrastruktur digital melalui *customer experience* yang koheren. *Community branch* berfungsi sebagai titik akses untuk *gig workers* dan sebagai sarana edukasi untuk *digital banking services*, serta berfungsi juga sebagai akuisisi untuk *community-based/supply chain lending*. Selain itu, *community branch* ini difungsikan untuk menyediakan *beyond solution* dengan menjadi *agregator* atau penghubung antara kebutuhan *merchant* dan *supplier* sehingga menjadi sebuah ekosistem bisnis yang dapat terus didukung oleh Bank Raya.

Pada tahun 2021 terdapat 2 *Community Branch* yang telah dibuka yaitu CB Bandung dan CB Cirebon. Rencana ke depan, unit kerja eksisting akan di-*repurpose* sebagai *community branch*, dan akan dibuka *community branch* di kota-kota tier 1 dan tier 2.

Tabel berikut menjabarkan jaringan kantor Bank Raya dalam 5 tahun terakhir:

The Company's network has covered 13 provinces and 17 major cities in Indonesia until the end of 2021. The Bank achieved a breakthrough by establishing a community branch to serve the informal economic community (*gig economy*) and fintech agents in order to facilitate the development of digital infrastructure through a consistent customer experience. The community branch serves as an entry point for *gig workers*, an educational facility for digital banking services, and a collection point for community-based/supply chain lending. Additionally, this community branch serves as an aggregator or liaison between merchants and suppliers, forming a business ecosystem that Bank Raya can support indefinitely.

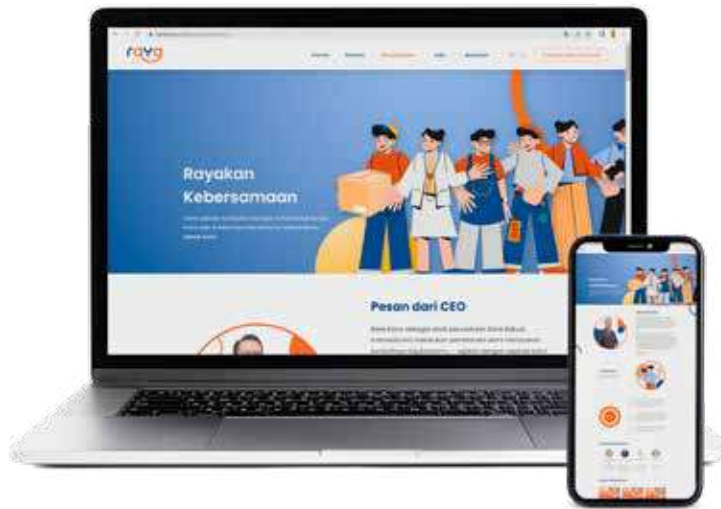
Two Community Branches have been established in 2021, namely CB Bandung and CB Cirebon. In the future, existing work units will be converted into community branches, with new community branches opening in tier 1 and tier 2 cities.

The following table summarises the network of Bank Raya offices throughout the previous five years:

Jaringan Kantor Office Network	2021	2020	2019	2018	2017
Kantor Pusat Head Office	1	1	1	1	1
Kantor Cabang Branch Office	11	18	18	18	16
Kantor Cabang Pembantu Sub-Branch Office	11	20	20	20	19
Kantor Kas Cash Office	3	4	4	4	4
Community Branch Community Branch	2	-	-	-	-
E-Buzz	1	1	1	1	0
Jumlah Total	29	44	44	44	42

Situs Bank Raya

Bank Raya's Website



Sebagaimana telah diatur dalam Peraturan Otoritas Jasa Keuangan No. 8/ POJK.04/2015 tentang Situs Web Perusahaan Publik dan Emiten, Bank Raya memberikan tampilan baru dalam penyajian informasi situs perusahaan yang dimiliki.

Website Perusahaan biasanya dipergunakan sebagai alat untuk mempromosikan produk atau jasa yang ditawarkan oleh Bank, dengan desain penyajian yang menarik, tampil dalam dua bahasa yaitu bahasa Inggris dan bahasa Indonesia, terdapat logo Bank Raya sebagai identitas disertai sistem navigasi yang simpel sehingga memudahkan pengunjungnya dalam mencari informasi.

Data dan informasi yang ditampilkan senantiasa diperbaharui secara berkala atau setiap kali ada perubahan, selain untuk memenuhi ketentuan peraturan juga menerapkan salah satu prinsip GCG yaitu keterbukaan.

Informasi yang wajib dimuat pada *website* perusahaan, yaitu:

1. Informasi umum emiten atau perusahaan publik;
2. Informasi bagi pemodal atau investor;
3. Informasi tata kelola perusahaan;
4. Informasi tanggung jawab sosial perusahaan.

Dengan tersedianya situs web Bank Raya sebagai sarana keterbukaan informasi tentang Bank, diharapkan akan meningkatkan kepercayaan masyarakat luas serta tentunya Pemegang Saham.

Informasi yang disajikan didalam *website* informasi umum tentang Bank Raya; sejarah singkat Bank Raya; visi dan misi; informasi produk dan layanan; struktur organisasi dan struktur grup Bank; serta kepemilikan saham. Selain itu juga menampilkan profil Dewan Komisaris; profil direksi; profil Manajemen; hubungan investor dan berita mengenai CSR dan informasi terkini Bank Raya.

As required by Financial Services Authority Regulation No. 8/ POJK.04/2015 on Public Companies and Issuers' Websites, Bank Raya takes a new approach to displaying information on the company's owned websites.

The Company's website is typically used to promote the Bank's products and services. It features an attractive presentation design, is available in two languages, English and Indonesian, and features the Bank Raya logo as an identity. It also features a simple navigation system that makes it easier for visitors to find information.

Along with adhering to legal requirements, one of the GCG principles is openness. The data and information provided are updated on a regular basis or whenever there is a change.

The following information must be presented on the corporate website:

1. The issuer's or public company's general information;
2. Information aimed as investors or potential investors;
3. Information about corporate governance;
4. Information about corporate social responsibility.

The Bank Raya website's availability as a way of disseminating information about the Bank is believed to strengthen the broader community's and, of course, Shareholders' confidence.

The general information website contains information about Bank Raya, including a short history, a vision and goal statement, product and service information, organisational structure and bank group structure, and share ownership. Additionally, it features the profiles of the Board of Commissioners, the Board of Directors, the management team, investor relations, and CSR news, as well as the newest information on Bank Raya.

Rantai Pasokan (GRI 102-9)

Supply Chain (GRI 102-9)

Bank Raya menggandeng sejumlah pemasok untuk mendukung operasional usaha, baik pemasok barang maupun jasa. Dalam menggandeng pemasok, Bank Raya berupaya semaksimal mungkin mencari mitra lokal yang lokasinya dekat dengan kantor operasional yang dimiliki Bank. Selain akan memberdayakan pemasok lokal, sekaligus menggerakkan roda ekonomi setempat, Bank Raya akan bisa mendapat harga yang lebih terjangkau karena lokasi pemasok secara geografis lebih dekat.

Dalam laporan ini, pemasok lokal adalah mereka yang berdomisili dan menjalankan usahanya di Indonesia. Selanjutnya, jika pemasok tersebut berdomisili dan menjalankan usahanya di luar Indonesia, Bank memasukkannya dalam kategori pemasok luar negeri.

Dengan kategorisasi seperti itu, jumlah pemasok dan nilai kontraknya pada tahun 2020 adalah sebagai berikut:

Bank Raya collaborates with a variety of vendors, both providers of products and services, to assist company operations. Bank Raya makes every attempt to work with local suppliers that are situated near the Bank's operational locations. Along with empowering local suppliers and boosting the local economy, Bank Raya will benefit from more inexpensive costs due to the proximity of suppliers.

Local suppliers are defined in this research as those who have their domicile and do business in Indonesia. Additionally, if the supplier is domiciled and does business outside of Indonesia, the Bank classifies him as a foreign supplier.

According to this classification, the number of suppliers and the value of their contracts in 2020 are as follows:

Keterangan Description	Jumlah Pemasok Total Suppliers			Nilai Kontrak Pekerjaan Work Contract Value (Juta Rupiah/Million Rupiah)		
	2021	2020	2019	2021	2020	2019
Nasional (Indonesia) National	11	20	36	1.713,28	2.104,88	6.891,32
Internasional (Luar Negeri/ Foreign)	2	1	1	690,82	316,88	-
Jumlah Total	13	21	37	2.404,10	2.421,76	-

Perubahan Signifikan (GRI 102-10)(C.6)

Significant Changes (GRI 102-10)(C.6)

Sepanjang tahun 2021, Bank menutup sejumlah unit kerja di beberapa wilayah. Hal ini sejalan dengan transformasi model bisnis yang dijalankan Bank.

Penutupan Unit Kerja

1. KCP Ciputat
2. KCP Tangerang
3. KCP Kebayoran Lama
4. KCP Kelapa Gading
5. KC Bintaro
6. KCP Depok
7. KCP Harapan Indah
8. KC Palembang
9. KC Bogor
10. KC Cikarang
11. KCP Pematang Siantar
12. KC Balikpapan
13. Kantor Kas PTPN IX

The Bank will close a number of work units across several regions in 2021. This is consistent with the Bank's business model transformation.

Closing of Work Units

1. KCP Ciputat
2. KCP Tangerang
3. KCP Kebayoran Lama
4. KCP Kelapa Gading
5. KC Bintaro
6. KCP Depok
7. KCP Harapan Indah
8. KC Palembang
9. KC Bogor
10. KC Cikarang
11. KCP Pematang Siantar
12. KC Balikpapan
13. PTPN IX Cash Office

Keanggotaan Asosiasi (GRI 102-13)(C.5)

Association Membership (GRI 102-13)(C.5)

Dalam rangka untuk memperkuat *network* dan memperoleh *update* terkait perkembangan industri perbankan, Bank Raya bergabungnya dalam sejumlah asosiasi sebagai berikut:

Bank Raya has joined the following associations to strengthen its network and stay informed about the banking industry's development:

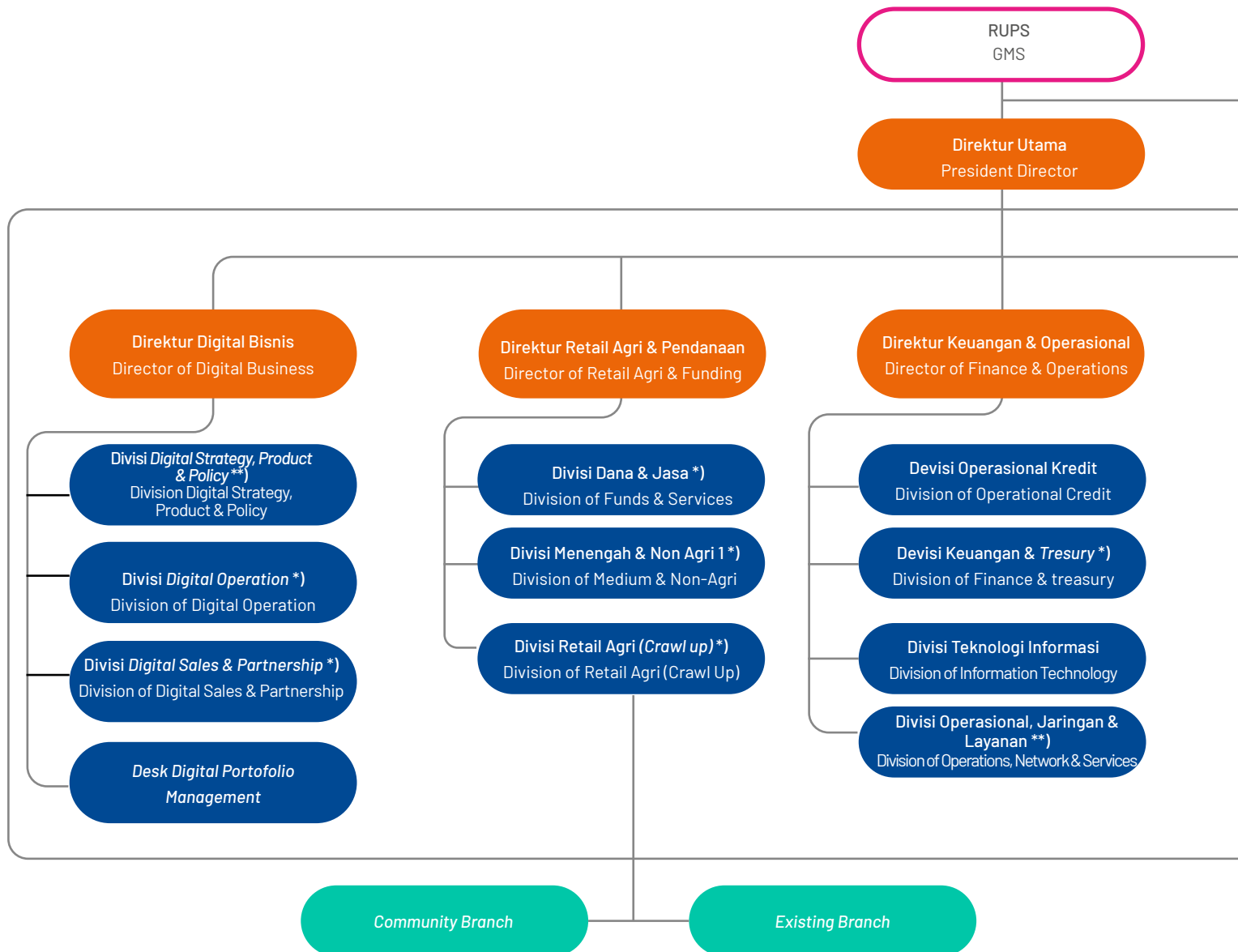
No	Institusi Institution	Posisi Position
1.	Perbanas : Persatuan Bank Nasional	Seluruhnya menjadi Anggota All become Members
2.	Aswifindo : Asosiasi Swift Indonesia	
3.	ASPI : Asosiasi Sistem Pembayaran Indonesia	
4.	LASPI : Lembaga Alternatif Penyelesaian Sengketa	
5.	AEI : Asosiasi Emiten Indonesia	
6.	FKDKP : Forum Komunikasi Direktur Kepatuhan Perbankan	
7.	AFTECH : Asosiasi Fintech Indonesia	
8.	ISCA : Indonesia Corporate Secretary Assosiation	

Struktur Organisasi

Organisational Structure

Berikut adalah Struktur Organisasi revisi terakhir berdasarkan No. Kpts. B. 237/Dir.04.02/CMG/06/2021

The following is the most recent Organizational Structure revision, based on Kpts. B. 237/Dir.04.02/CMG/06/2021.



Dewan Komisaris
Board of Commissioners

Direktur Enterprise Risk,
Compliance & Human Resource
Director of Enterprise Risk,
Compliance & Human Resource

Divisi Legal & Compliance *)
Division of Legal & Compliance

Divisi Human Capital 3) *)
Division of Human Capital 3)

Desk Enterprise Risk Management 2)
Division of Enterprise Risk
Management

SEVP Credit Risk

Divisi Analisa Risiko Kredit 4
Division of Credit Risk Analysis 4

Divisi Restrukturisasi
Penyelamatan Kredit
Division of Credit Rescue
Restructuring

Satuan Kerja Audit Intern (SKAI) *)
Internal Audit Work Unit

Divisi Sekretariat Perusahaan *)
Division of Corporate Secretary

Divisi Change Management 5) *)
Division of Change Management

Profil Dewan Komisaris

Profile of The Board of Commissioners



BUDI SATRIA
Komisaris Utama
President Commissioner

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 19 Februari 2020
Legal Basis of Appointment	Annual General Meeting of Shareholders of the Company on February 19, 2020
Usia Age	58 tahun 58 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana jurusan Hukum Perdata dari Universitas Islam Indonesia, Yogyakarta (1987) ➤ Magister Management dari Universitas Indonesia, Jakarta, (2001)
Educational Background	➤ Bachelor in Civil Law from Yogyakarta's Islamic University of Indonesia (1987) ➤ Management Master's degree from the University of Indonesia in Jakarta (2001)
Riwayat Pekerjaan	➤ Komisaris Utama Bank Raya (2020-sekarang) ➤ Direktur Consumer Banking BTN (2017-2019). ➤ Kepala Kantor Wilayah Jakarta 1 BRI (2015-2017) ➤ Kepala Divisi di Divisi Sekretariat Perusahaan BRI (2014-2015)
Work Experiences	➤ President Commissioner of Bank Raya (2020-present) ➤ Director of Consumer Banking of BTN (2017-2019). ➤ Head of BRI's Regional Office in Jakarta 1 (2015-2017) ➤ Division Head in BRI's Corporate Secretariat (2014-2015)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	0,0059%
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



EKO B. SUPRIYANTO
Komisaris Independen
Independent Commissioner

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 9 April 2021
Legal Basis of Appointment	The Company's Annual General Meeting of Shareholders on April 9, 2021
Usia Age	57 tahun 57 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana Ekonomi dari Universitas Pembangunan, Jakarta (1996) ➤ Magister Manajemen dari Universitas Trisakti (2014).
Educational Background	➤ Bachelor of Economics from Development University, Jakarta (1996) ➤ Master of Management from Trisakti University (2014).
Riwayat Pekerjaan	➤ Komisaris Independen Bank Raya (2021 - Sekarang) ➤ Direktur Utama PT Infoarta Pratama (Infobank) (2015-Sekarang) ➤ Komisaris Utama PT Bank MNC Internasional Tbk (2016-2018) ➤ Komisaris Independen PT Bank Mutiara Tbk (2009-2015)
Work Experiences	➤ Independent Commissioner of Bank Raya (2021 - Present) ➤ President Director of PT Infoarta Pratama (Infobank) (2015-present) ➤ President Commissioner of PT Bank MNC International Tbk (2016-2018) ➤ Independent Commissioner of PT Bank Mutiara Tbk (2009-2015)
Jabatan Lainnya	Direktur Utama PT Infoarta Pratama (Infobank)
Other Positions	President Director of PT Infoarta Pratama (Infobank)
Kepemilikan Saham Share Ownership	Tidak Ada None
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



RINA SAADAH
Komisaris Independen
Independent Commissioner

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 9 April 2021
Legal Basis of Appointment	The Company's Annual General Meeting of Shareholders on April 9, 2021
Usia Age	31 tahun 31 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Licence dari Universitas Al Azhar Cairo Mesir (2008) ➤ Magister Sains dari Universitas Indonesia (2015) ➤ Kandidat Doktor Ilmu Manajemen Universitas Padjadjaran
Educational Background	➤ Licence from University of Al Azhar Cairo Mesir (2008) ➤ Master of Science from University of Indonesia (2015) ➤ Candidate for Doctor of Management Science at Padjadjaran University
Riwayat Pekerjaan	➤ Komisaris Independen Bank Raya (2021-Sekarang) ➤ Penasihat Ahli Menteri Kelautan dan Perikanan (2019 – 2020) ➤ Tenaga Ahli Komite Olimpiade Indonesia (KOI) (2017-2018) ➤ Tenaga Ahli Kementerian Pemuda dan Olahraga (2015-2017)
Work Experiences	➤ Independent Commissioner of Bank Raya (2021-Present) ➤ Expert Advisor to the Minister of Marine Affairs and Fisheries (2019 – 2020) ➤ Expert Advisor to the Indonesian Olympic Committee (KOI) (2017-2018) ➤ Expert Advisor to the Minister of Youth and Sports (2015-2017)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	Tidak Ada None
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



RAMA G. NOTOWIDIGDO
Komisaris Independen
Independent Commissioner

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 9 April 2021
Legal Basis of Appointment	The Company's Annual General Meeting of Shareholders on April 9, 2021
Usia Age	48 tahun 48 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana Computer Information System, Missouri State University, USA (1994) ➤ MBA, Saint Louis University, USA (1997).
Educational Background	➤ Bachelor of Computer Information System, Missouri State University, USA (1994) ➤ MBA, Saint Louis University, USA (1997).
Riwayat Pekerjaan	➤ Komisaris Independen Bank Raya (2021 - Sekarang) ➤ Direktur PT Kreasi Nostra Mandiri (Sayurbox) (2017-Sekarang) ➤ Direktur PT Awan Tunai Indonesia (2017-2021)
Work Experiences	➤ Independent Commissioner of Bank Raya (2021-Present) ➤ Director of PT Kreasi Nostra Mandiri (Sayurbox) (2017-Present) ➤ Director of PT Awan Tunai Indonesia (2017-2021)
Jabatan Lainnya Other Positions	Direktur PT Kreasi Nostra Mandiri (SayurBox) Director of PT Kreasi Nostra Mandiri (SayurBox)
Kepemilikan Saham Share Ownership	Tidak Ada None
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



ACHMAD F. C. BARIR
Komisaris
Commissioner

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 9 April 2021
Legal Basis of Appointment	The Company's Annual General Meeting of Shareholders on April 9, 2021
Usia Age	56 tahun 56 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana Ekonomi Perusahaan dari Universitas Gajah Mada (1991) ➤ MM Agribisnis dari Institut Pertanian Bogor (1999).
Educational Background	➤ Bachelor of Corporate Economics from Gajah Mada University (1991) ➤ MM Agribusiness from Bogor Agricultural University (1999).
Riwayat Pekerjaan	➤ Komisaris Bank Raya (2021 – Sekarang) ➤ Kepala Divisi Analisis Risiko Kredit BRI (2018–2021) ➤ Wakil Kepala Divisi Analisis Risiko Kredit BRI (2016–2017)
Work Experiences	➤ Commissioner of Bank Raya (2021–Present) ➤ Head of BRI Credit Risk Analysis Division (2018–2021) ➤ Deputy Head of BRI Credit Risk Analysis Division (2016–2017)
Kepemilikan Saham Share Ownership	0,0053%
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



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Profil Direksi

Profile of the Board of Directors



KASPAR SITUMORANG
Direktur Utama
President Director

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 9 April 2021
Legal Basis of Appointment	Annual General Meeting of Shareholders of the Company on April 9, 2021
Usia Age	36 tahun 36 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana Ilmu Komputer dari Institut Pertanian Bogor (2006) ➤ Magister Teknik Komputer, University of Duisburg-Essen, Germany (2014)
Educational Background	➤ Bachelor of Computer Science from Bogor Agricultural University (2006) ➤ Master in Computer Engineering, University of Duisburg-Essen, Germany (2014)
Riwayat Pekerjaan	➤ Direktur Utama Bank Raya (2021 – Sekarang) ➤ Komisaris PT Fintek Karya Nusantara (2019-2021) ➤ Kepala Divisi Digital Banking Development & Operation BRI (2020-2021) ➤ Kepala Divisi <i>Digital Center of Excellence</i> BRI (2017-2020)
Work Experiences	➤ President Director of Bank Raya (2021 – Present) ➤ Commissioner of PT Fintek Karya Nusantara (2019-2021) ➤ Division Head of Digital Banking Development & Operation BRI Division (2020-2021) ➤ Head Division of Digital Center of Excellence BRI (2017-2020)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	0,013%
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



ARIF WICAKSONO
Direktur Keuangan & Operasional
Director of Finance and Operations

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan tanggal 19 Februari 2020
Legal Basis of Appointment	Annual General Meeting of Shareholders of the Company on February 19, 2020
Usia Age	56 tahun 56 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana jurusan Ekonomi dari Universitas Brawijaya, Surabaya (1990) ➤ Magister Management dari Universitas Gajah Mada, Yogyakarta (1999) ➤ Magister Information System dari Adger University College, Norway (1999)
Educational Background	➤ Bachelor's degree in Economics from Brawijaya University, Surabaya (1990) ➤ Master of Management from Gadjah Mada University, Yogyakarta (1999) ➤ Master in Information Systems from Adger University College, Norway (1999)
Riwayat Pekerjaan	➤ Direktur Keuangan dan Operasional Bank Raya (2020 - Sekarang) ➤ Kepala Divisi Retail Payment BRI (2018-2020) ➤ Wakil Pemimpin Wilayah Bidang Operasional Kanwil Denpasar (2016-2017) ➤ Wakil Pemimpin Wilayah Bidang Operasional Kanwil Pekanbaru (2014-2016)
Work Experiences	➤ Director of Finance and Operations of Bank Raya (2020 - Present) ➤ Division Head of BRI Retail Payment Division (2018-2020) ➤ Deputy Regional Head for Denpasar Regional Office Operations (2016-2017) ➤ Deputy Regional Head for Pekanbaru Regional Office Operations (2014-2016)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	0,011%
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



ERNAWAN
**Direktur Enterprise Risk Management,
Compliance and Human Resource**
**Director of Enterprise Risk Management,
Compliance and Human Resource**

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Luar Biasa Perseroan tanggal 23 Januari 2019
Legal Basis of Appointment	On January 23, 2019, the Company held an Extraordinary General Meeting of Shareholders
Usia Age	58 tahun 58 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Bogor
Riwayat Pendidikan	➤ Sarjana jurusan Ekonomi Akuntansi dari Universitas Pakuan Bogor (1990) ➤ Magister jurusan Agribisnis di Institut Pertanian Bogor (2001)
Educational Background	➤ Bachelor of Economics majoring in Accounting from Pakuan University, Bogor (1990) ➤ Master in Agribusiness at Bogor Agricultural Institute (2001)
Riwayat Pekerjaan	➤ Direktur <i>ERM, Compliance & Human Resources</i> Bank Raya (2021- Sekarang) ➤ Direktur Operasional dan Keuangan BRI Agro (2019-2020) ➤ Kepala Divisi Assets & Liabilities Management BRI (2018) ➤ Kepala Divisi Akuntansi Manajemen & Keuangan BRI (2016-2018)
Work Experiences	➤ Director of ERM, Compliance & Human Resources at Bank Raya (2021-Present) ➤ Director of Operations and Finance of BRI Agro (2019-2020) ➤ Division Head of Assets & Liabilities Management Division BRI (2018) ➤ Division Head of Management & Finance Accounting Division BRI (2016-2018)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	0,28%
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



SIGIT MURTIYOSO
Direktur Retail Agri & Pendanaan
Director of Agri Retail & Funding

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Luar Biasa Perseroan tanggal 26 Juni 2019
Legal Basis of Appointment	The Extraordinary General Meeting of Shareholders of the Company will be held on June 26, 2019
Usia Age	56 tahun 56 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan Educational Background	Sarjana jurusan Hukum dari Universitas Sebelas Maret - Surakarta (1988). Bachelor's degree in Law from Sebelas Maret University - Surakarta (1988).
Riwayat Pekerjaan Work Experiences	➤ Direktur Ritel Agri & Pendanaan (2021-Sekarang) ➤ Direktur Bisnis BRI Agro (2019 - 2021) ➤ Pemimpin Kantor Cabang Khusus BRI (2018 - 2019)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	0,028%
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama. Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.



BHIMO WIKAN HANTORO
Direktur Digital Bisnis
Director of Digital Business

Dasar Hukum Pengangkatan	Rapat Umum Pemegang Saham Tahunan Perseroan pada 9 April 2021
Legal Basis of Appointment	Annual General Meeting of Shareholders of the Company on April 9, 2021
Usia Age	36 tahun 36 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	➤ Sarjana Teknik Elektro dari Institut Teknologi Bandung (2008) ➤ Magister Telecommunication Engineering dari Institut Teknologi Bandung (2010) ➤ Master of Science (M.Sc) Electrical Engineering dari Delft University of Technology - Belanda (2011).
Educational Background	➤ Bachelor of Electrical Engineering from Bandung Institute of Technology (2008) ➤ Master in Telecommunication Engineering from Bandung Institute of Technology (2010) ➤ Master of Science (M.Sc) Electrical Engineering from Delft University of Technology - Belanda (2011).
Riwayat Pekerjaan	➤ Direktur Digital Bisnis Bank Raya (2021- Sekarang) ➤ Senior Vice President Innovation, PT Pegadaian (Persero) (2018 - 2021) ➤ Konsultan Accenture Belanda (2014-2018)
Work Experiences	➤ Director of Digital Business at Bank Raya (2021- Present) ➤ Senior Vice President Innovation of PT Pegadaian (Persero) (2018 - 2021) ➤ Consultant Accenture The Netherland (2014-2018)
Jabatan Lainnya Other Positions	Tidak Ada None
Kepemilikan Saham Share Ownership	0,011%
Hubungan Afiliasi	Tidak memiliki hubungan afiliasi baik dengan anggota Direksi, anggota Dewan Komisaris lainnya maupun dengan pemegang saham pengendali dan utama.
Affiliation	Has no ties to the Board of Directors, other members of the Board of Commissioners, or controlling and substantial shareholders.

Profil Senior Executive Vice President (SEVP)

Profile of the Senior Executive Vice President (SEVP)



DEDY HENDRIANTO
SEVP Credit Risk
SEVP of Credit Risk

Dasar Hukum Pengangkatan	SK Pengangkatan: R.439/HCP/TML/05/2021 tgl 27 Mei 2021
Legal Basis of Appointment	Appointment Decree: R.439/HCP/TML/05/2021 on May 27, 2021
Usia Age	48 tahun 48 years of age
Kewarganegaraan Nationality	Indonesia
Domisili Domicile	Jakarta
Riwayat Pendidikan	S1 Unair Surabaya Jurusan: Ekonomi Studi Pembangunan (1999)
Educational Background	Bachelor's Degree, Airlangga University, Surabaya, Department: economics development studies (1999)
Riwayat Pekerjaan	➤ SEVP Credit Risk Bank Raya (2021 - Sekarang) ➤ Vice President Corporate Banking 2.3. Team, Corporate Banking 2 Division BRI (2020 - 2021) ➤ Assistant Vice President, Corporate Banking 2 Division BRI (2020 - 2020)
Work Experiences	➤ SEVP of Credit Risk at Bank Raya (2021-present) ➤ Vice President Corporate Banking 2.3. Team, Corporate Banking 2 Division at BRI (2020-2021) ➤ Assistant Vice President, Corporate Banking 2 Division at BRI (2020-2020)
Masuk Bank Raya Time of Getting in Bank Raya	2021

Pejabat Eksekutif Executives



Hirawan Nur K.
Kepala Divisi Sekretariat Perusahaan
Executive Vice President of Corporate Secretariat Division

Usia Age	58
Domisili Domicile	Tangerang Selatan South Tangerang
Dasar Hukum Pengangkatan Legal Basis of Appointment	PKWT No. 1154/PKWT-SDM/04/2019
Riwayat Pendidikan Educational Background	S1 Universitas Indonesia, Jurusan: Matematika Bachelor's Degree of University of Indonesia, Major: Mathematics
Masuk Bank Raya Time of Getting in Bank Raya	1989



Anshari Assadiqi
Kepala SKAI
Executive Vice President of Internal Audit

Usia Age	56
Domisili Domicile	Jakarta Selatan South Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	PKWT No. 2092/PKWT-HCP/11/2021
Riwayat Pendidikan Educational Background	S1 Universitas Lambung Mangkurat Banjarmasin, Jurusan: Ekonomi Pembangunan Bachelor's Degree of University of Lambung Mangkurat Banjarmasin, Department: Development Economics
Masuk Bank Raya Time of Getting in Bank Raya	1-Oct-2020



Siaga Ridha Utama
Kepala Divisi Change Management
Executive Vice President of Change Management Division

Usia Age	35
Domisili Domicile	Jakarta Selatan South Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.114/Dir.02.04/HCP/PHC/04/2021
Riwayat Pendidikan	➤ S2 Manchester Business School, Jurusan: MBA ➤ S1 Universitas Indonesia Jurusan: Ekonomi
Educational Background	➤ Master's Degree of Manchester Business School, Jurusan: MBA ➤ Bachelor's Degree of University of Indonesia Major: Economics
Masuk Bank Raya Time of Getting in Bank Raya	1-Apr-2021



Jaya Pratama Silalahi
Kepala Divisi Retail Agri (Crawl Up)
Executive Vice President of Retail Agri Division (Crawl Up)

Usia Age	39
Domisili Domicile	Jakarta Barat West Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.639/Dir.01.03/HCP/TML/11/2021
Riwayat Pendidikan Educational Background	S1 Universitas Brawijaya Malang, Jurusan: Ekonomi Bachelor's Degree from University of Brawijaya Malang, Major: Economics
Masuk Bank Raya Time of Getting in Bank Raya	25 September 2014



Ririn Widyani
Kepala Divisi Digital Strategy, Product & Policy
Executive Vice President of Digital Strategy, Product & Policy Division

Usia Age	30
Domisili Domicile	Bandung
Dasar Hukum Pengangkatan Legal Basis of Appointment	PKWT No.1996/PKWT-HCP/06/2021
Riwayat Pendidikan Educational Background	S1 Institut Teknologi Bandung, Jurusan: Teknik Telekomunikasi Bachelor's Degree from Bandung Institute of Technology, Department: Telecommunication Engineering
Masuk Bank Raya Time of Getting in Bank Raya	5-Jul-2021



RR. Gati Pratiwi
Kepala Divisi Operasional Kredit
Executive Vice President of Credit Operations Division

Usia Age	59
Domisili Domicile	Bekasi
Dasar Hukum Pengangkatan Legal Basis of Appointment	PKWT No.881/PKWT-MSDM/11/2018
Riwayat Pendidikan Educational Background	➤ S2 Universitas Padjajaran, Jurusan: Kenotariatan ➤ S1 Universitas Padjajaran, Jurusan: Hukum/Perdata ➤ Master's Degree from Padjadjaran University, Department: Notary ➤ Bachelor's Degree from Padjadjaran University, Major: Law/Civil
Masuk Bank Raya Time of Getting in Bank Raya	30-Oct-2018



Ayuningtyas Alamsyah
Wakil Kepala Divisi Analisis Risiko Kredit
Vice President of Credit Risk Analysis Division

Usia Age	33
Domisili Domicile	Bogor
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.480/Dir.01.03/HCP/TML/09/2021
Riwayat Pendidikan Educational Background	S1 Institut Pertanian Bogor, Jurusan: Ekonomi & Manajemen Bachelor's Degree from Bogor Agricultural University, Major: Economics & Management
Masuk Bank Raya Time of Getting in Bank Raya	2-Sep-2013



Zainal Arifin
Kepala Divisi RPK
Executive Vice President of Credit Restructuring and Settlement Division

Usia Age	50
Domisili Domicile	Jakarta Timur East Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.30/Dir.01.02/HCP/PHC/1/2021
Riwayat Pendidikan Educational Background	S1 STIE Indonesia Jakarta, Jurusan: Ekonomi Akuntansi Bachelor's Degree from STIE Indonesia Jakarta, Major: Accounting Economics
Masuk Bank Raya Time of Getting in Bank Raya	1-Feb-2021



Ambar Rukmi Yusmawati
Kepala Divisi Risk, Legal & Compliance
Executive Vice President of Risk, Legal & Compliance Division

Usia Age	50
Domisili Domicile	Bogor
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.01/Dir.01.02/HCP/PHC/12/2020
Riwayat Pendidikan	➤ S2 Universitas Gadjah Mada, Jurusan: Hukum Bisnis ➤ S1 Universitas Sebelas Maret, Jurusan: Hukum/Perdata
Educational Background	➤ Master's Degree from Gadjah Mada University, Major: Business Law ➤ Bachelor's Degree from Sebelas Maret University, Major: Law/Civil
Masuk Bank Raya Time of Getting in Bank Raya	1-Dec-2020



Sri Widiyati
Kepala Divisi Human Capital
Executive Vice President of Human Capital Division

Usia Age	55
Domisili Domicile	Bekasi
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.07/Dir.01.02/HCP/PHC/11/2020
Riwayat Pendidikan	➤ S2 Universitas Gadjah Mada, Jurusan: Manajemen Sumber Daya ➤ S1 Universitas Airlangga, Jurusan: Psikologi
Educational Background	➤ Master's Degree from Gadjah Mada University, Department: Resource Management ➤ Bachelor's Degree from Airlangga University, Department: Psychology
Masuk Bank Raya Time of Getting in Bank Raya	1-Nov-2020



Idewan Diaz
Kepala Divisi Operasional, Jaringan & Layanan
Executive Vice President of Operations, Network & Service

Usia Age	55
Domisili Domicile	Jakarta Selatan South Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.164/Dir.03.04/HCP/PHC/05/2021
Riwayat Pendidikan	➤ S2 Universitas Indonesia, Jurusan: <i>Management Accounting</i> ➤ S1 ISTN Jakarta, Jurusan: Teknik Sipil
Educational Background	➤ Master's Degree from University of Indonesia, Department: <i>Management Accounting</i> ➤ Bachelor's Degree from ISTN Jakarta, Department: <i>Civil Engineering</i>
Masuk Bank Raya Time of Getting in Bank Raya	21-Nov-2001



Gibbon Mardame Parsaoran Tamba
Kepala Divisi Teknologi Informasi
Executive Vice President of Information Technology Division

Usia Age	40
Domisili Domicile	Bekasi
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.26/Dir.01.02/SDM/PSD/05/2019
Riwayat Pendidikan	S1 Institut Pertanian Bogor, Jurusan: Ilmu Pasti dan Alam
Educational Background	Bachelor's Degree from Bogor Agricultural University, Department: Exact and Natural Sciences
Masuk Bank Raya Time of Getting in Bank Raya	1-Jun-2019



Poppy Lindasari
Kepala Divisi Keuangan & Treasury
Executive Vice President of Finance & Treasury

Usia Age	51
Domisili Domicile	Bekasi
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.482/Dir.01.03/HCP/09/2021
Riwayat Pendidikan Educational Background	S1 Universitas Padjadjaran, Jurusan: Akuntansi Bachelor's Degree from Padjadjaran University, Major: Accounting
Masuk Bank Raya Time of Getting in Bank Raya	3-Jun-2002



Indra Subhan Nasution
Kepala Divisi Dana & Jasa
Executive Vice President of Funds & Services Division

Usia Age	54
Domisili Domicile	Jakarta Selatan South Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.20/Dir.04.05/MSDM/II/2018
Riwayat Pendidikan Educational Background	➤ S2 Boston University, Jurusan: Bisnis Administrasi ➤ S1 Universitas Trisakti, Jurusan: Bisnis Administrasi ➤ Master's Degree from Boston University, Department of: Administration Bussines ➤ Bachelor's Degree from Trisakti University, Department of: Administration Bussines
Masuk Bank Raya Time of Getting in Bank Raya	1-Jul-1996



Eka Puspitasari
Kepala Divisi Menengah & Non Agri
Executive Vice President of Middle & Non Agri Division

Usia Age	40
Domisili Domicile	Depok
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.639/Dir.01.03/HCP/TML/11/2021
Riwayat Pendidikan Educational Background	S1 Institut Pertanian Bogor, Jurusan: Peternakan Bachelor's Degree from Bogor Agricultural University, Department: Animal Husbandry
Masuk Bank Raya Time of Getting in Bank Raya	5-May-2008



Achmad Furqan Idrus
Kepala Divisi Digital Operation
Executive Vice President of Digital Operations Division

Usia Age	31
Domisili Domicile	Tangerang Selatan SouthTangerang
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.2030/HCP/TML/09/2021
Riwayat Pendidikan Educational Background	S1 Institut Teknologi Bandung, Jurusan: Teknik Elektro Bachelor's Dgree from Bandung Institute of Technology, Department: Electrical Engineering
Masuk Bank Raya Time of Getting in Bank Raya	4-Oct-2021



Aditya Sjahrandra
Kepala Divisi Sales & Partnership
Executive Vice President of Sales & Partnership Division

Usia Age	31
Domisili Domicile	Jakarta Selatan South Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.02/Dir.01.02/HCP/PHC/01/2021
Riwayat Pendidikan	S1 Universitas Pelita Harapan, Jurusan Ekonomi
Educational Background	Bachelor's Degree from Pelita Harapan University, Majoring in Economics
Masuk Bank Raya Time of Getting in Bank Raya	01-Jan-2021



Marina
Kepala Desk Enterprise Risk Management
Vice President of Risk Management Desk

Usia Age	51
Domisili Domicile	Jakarta Selatan South Jakarta
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.16/Dir.01.02/HCP/PHC/11/2020
Riwayat Pendidikan	➤ S2 University of Rochester, Jurusan: MBA ➤ S1 Institut Pertanian Bogor, Jurusan: Perikanan
Educational Background	➤ Master's Degree from University of Rochester, Major: MBA ➤ Bachelor's Degree from Bogor Agricultural University, Department: Fisheries
Masuk Bank Raya Time of Getting in Bank Raya	01-Des-2020



Yudi Putra Agung
Kepala Desk Digital Portofolio Management
 Vice President of the Digital Portfolio Management Desk

Usia Age	36
Domisili Domicile	Bandung
Dasar Hukum Pengangkatan Legal Basis of Appointment	R.2023/HCP/TML/09/2021
Riwayat Pendidikan Educational Background	S1 Institut Teknologi Bandung, Jurusan: Teknik Elektro Bachelor's Degree from Bandung Institute of Technology, Department: Electrical Engineering
Masuk Bank Raya Time of Getting in Bank Raya	13-Des-2021

Struktur dan Komposisi Pemegang Saham (GRI 102-5)(C.3)

Structure and Composition Of Shareholders (GRI 102-5)(C.3)



Komposisi Pemegang Saham

Composition of Shareholders

No	Pemegang Saham Shareholders	1 Januari 2021 January 1, 2021		31 Desember 2021 December 31, 2021	
		Jumlah Saham Number of shares	Persentase Kepemilikan Saham Share Ownership Percentage	Jumlah Saham Number of shares	Persentase Kepemilikan Saham Share Ownership Percentage
1	PT Bank Rakyat Indonesia (Persero) Tbk	18.589.384.692	87,097%	19.498.475.601	85,72 %
2	Masyarakat Public	1.686.264.063	12,201%	3.248.051.111	14,28 %
Total Total		21.343.290.230	100%	22.746.526.712	100,00%

Komposisi 20 Pemegang Saham Terbesar

Composition of The 20 Biggest Shareholders

No.	Pemegang Saham Shareholders	Jumlah Total Shares	Persentase (%) Share Ownership Percentage
1.	PT Bank Rakyat Indonesia (Persero) Tbk	19.498.475.601	85,72%
2.	Dana Pensiun Perkebunan	922.431.975	4,06%
3.	State Street Bank - Smallcap World Fund Inc.	290.419.767	1,28%
4.	State Street Bank - American Funds Insurance Series Global Small Capitalization Fund	72.214.096	0,32%
5.	RD Batavia Dana Saham	59.810.677	0,26%
6.	Reksa Dana Manulife Dana Saham	58.274.392	0,26%
7.	JPMCB NA RE - Vanguard Emerging Markets Stock Index Fund	56.701.193	0,25%
8.	JPMCB NA RE - Vanguard Total International Stock Index Fund	56.436.433	0,25%
9.	PT Prudential Life Assurance - REF	53.479.340	0,25%
10.	Citibank New York S/A Government Of Norway	53.000.000	0,23%
11.	PT Prudential Life Assurance - REP	48.641.002	0,21%
12.	The Northern Trust Company S/A Government Of Singapore	43.856.938	0,19%
13.	UI Equity Solid	30.298.458	0,13%
14.	The Nt Tst Co S/A Barings International Umbrella Fund	27.610.859	0,12%
15.	Reksa Dana Eastspring Investments Value Discovery	25.107.579	0,11%
16.	State Street Bank - Caisse De Depot Et Placement Du Quebec	23.801.347	0,10%
17.	Reksa Dana Ashmore Dana Ekuitas Nusantara	22.443.274	0,10%
18.	RD Manulife Dana Saham Utama	22.296.012	0,10%
19.	The Nt Tst Co S/A Asia Landmark Master Fund Ltd	21.666.368	0,10%
20.	Manulife Dana Ekuitas	21.487.700	0,09%

Rincian Pemegang Saham dan Persentase Kepemilikan

Details Of Shareholders And Percentage Of Ownership

No.	Pemegang Saham Shareholders	Jumlah Total Shares	Persentase (%) Share Ownership Percentage
Pemegang Saham yang Memiliki 5% atau Lebih Saham Shareholders Owning 5% or More Shares			
1.	PT Bank Rakyat Indonesia (Persero) Tbk	19.498.475.601	85,72%
2.	Masyarakat Public	3.248.051.111	14,28%
Anggota Direksi dan Anggota Dewan Komisaris yang Memiliki Saham Members of the Board of Directors and Members of the Board of Commissioners who Own Shares			
Dewan Komisaris Board of Commissioners:			
1.	Budi Satria	1.351.453	0,0059%
2.	Achmad F. C. Barir	1.216.287	0,0053%
Direksi Board of Directors:			
1.	Kaspar Situmorang	3.003.336	0,013%
2.	Arif Wicaksono	2.552.642	0,011%
3.	Ernawan	6.318.321	0,028%
4.	Sigit Murtiyoso	6.318.741	0,028%
5.	Bhimo Wikan Hantoro	2.552.642	0,011%
	Total	22.746.526.712	100,00%

Kepemilikan Saham Berdasar Klasifikasi Share Ownership Based On Classification

Pemegang Saham Shareholders	Jumlah Investor Total Shares	Jumlah Saham Share Ownership Percentage	Persentase Kepemilikan Saham Shareholders
Pemodal Nasional National Investor	51.101	21.947.240.687	96,49%
Pemodal Asing Foreign Investor	105	799.286.025	3,51%
Total <i>Total</i>	51.206	22.746.526.712	100%

Profil Singkat Pemegang Saham Utama Profil Singkat Pemegang Saham Utama



PT BANK RAKYAT INDONESIA (PERSERO) TBK
Gedung BRI
BRI Building
Jl. Jenderal Sudirman Kav.44-46 Jakarta 10210

PT Bank Rakyat Indonesia (Persero) Tbk (BBRI) atau BRI merupakan bank komersial terbesar di Indonesia yang didirikan pada tanggal 16 Desember 1895, di Purwokerto, Jawa Tengah dengan ruang lingkup usaha di bidang perbankan. Kemudian pada tahun 1946, Pemerintah RI mengeluarkan Peraturan Pemerintah No. 1 Pasal satu yang menyatakan bahwa BRI adalah sebagai Bank Pemerintah pertama di Republik Indonesia. Tahun 1992 status BRI berubah menjadi perseroan terbatas, dengan kepemilikan saham pada akhir tahun 2021 adalah Pemerintah Republik Indonesia sebagai pemegang saham utama dengan jumlah saham sebanyak 56,75% dan masyarakat 43,25%. Hingga akhir tahun 2021, jumlah aset yang dimiliki oleh BRI adalah sebesar Rp1.678.098 Miliar.

PT Bank Rakyat Indonesia (Persero) Tbk (BBRI) or BRI is Indonesia's leading commercial bank, having been founded on December 16, 1895, in Purwokerto, Central Java, with a banking business scope. Then, in 1946, the Government of Indonesia adopted Government Regulation No. 1 Article 1, establishing BRI as the Republic of Indonesia's first government bank. BRI was converted to a limited liability company in 1992, with the government of the Republic of Indonesia being the primary stakeholder by the end of 2021, holding a total of 56.75%, and the public holding 43.25%. BRI's total assets as of the end of 2021 are IDR 1.678.098 Billion.

Kepengurusan Management

Dewan Komisaris

Board of Commissioners

Komisaris Utama/President Commissioner	: Kartika Wirjoatmodjo
Wakil Komisaris Utama/Komisaris Independen/ Deputy President Commissioner/Independent Commissioner	: Rofikoh Rokhim
Komisaris Independen/Independent Commissioner	: Heri Sunaryadi
Komisaris Independen/Independent Commissioner	: Hendrikus Ivo
Komisaris Independen/Independent Commissioner	: Zulnahr Usman
Komisaris Independen/Independent Commissioner	: R. Widyo Pramono
Komisaris Independen/Independent Commissioner	: Dwi Ria Latifa
Komisaris/Commissioner	: Nicolaus Teguh Budi Harjanto
Komisaris/Commissioner	: Hadiyanto
Komisaris/Commissioner	: Rabin Indrajad Hattari

Direksi

Board of Directors

Direktur Utama/President Director

: Sunarso

Wakil Direktur Utama/Vice President Director

: Catur Budi Harto

Direktur Bisnis Mikro/Director of Micro Business

: Supari

Direktur Bisnis Kecil dan Menengah/Director of Small and Medium Business

: Amam Sukriyanto

Direktur Bisnis Konsumer/Director of Consumer Business

: Handayani

Direktur Keuangan/Director of Finance

: Viviana Dyah Ayu Retno K

Direktur Digital, Teknologi Informasi, dan Operasi/

: Indra Utoyo

Director of Digital, Information Technology, and Operations

Direktur Kepatuhan/Director of Compliance

: Ahmad Solichin Lutfiyanto

Direktur Human Capital/Director of Human Capital

: Agus Winardono

Direktur Manajemen Risiko/Director of Risk Management

: Agus Sudiarto

Direktur Bisnis Wholesale dan Kelembagaan/

: Agus Noorsanto

Director of Wholesale and Institutional Business

Direktur Jaringan dan Layanan/Director of Network and Services

: Arga M. Nugraha

Kronologi Penerbitan dan/atau Pencatatan Saham Issuance and/or Share Listing Chronology

Tahun Year	Aksi Korporasi Corporate Action	Jumlah Saham Baru Total New Shares	Tanggal Pencatatan di Bursa Exchange Listing Date	Nilai Nominal Nominal (Rp)	Jumlah Saham Total Shares	Jumlah Modal Disetor Total Paid-in Capital
2003	Penawaran Umum Perdana (IPO) Initial Public Offering (IPO)	1.529.336.690	30 Juni 2003 June 30, 2003	100	1.529.336.690	152.933.669.000
2003	Penawaran Umum Terbatas dengan HMETD (PUT I) Limited Public Offering with Rights (PUT I)	305.867.338	7 November 2003 November 7, 2003	100	1.835.204.028	183.520.402.800
2005	Penawaran Umum Terbatas dengan HMETD (PUT II) Limited Public Offering with Rights (PUT II)	513.857.128	14 Maret 2005 March 14, 2005	100	2.349.061.156	234.906.115.600
2009	Penawaran Umum Terbatas Tanpa HMETD Limited Public Offering without Rights	64.000.000	24 Maret 2009 March 24, 2009	100	2.413.061.156	241.306.115.600
2009	Penawaran Umum Terbatas dengan HMETD (PUT III) Limited Public Offering with Rights (PUT III)	1.005.144.172	9 November 2009 November 9, 2009	100	3.418.205.328	341.820.532.800
2011	Pelaksanaan Waran seri I (PUT III) Execution of Series I Warrants (PUT III)	199.890.250	25 Mei 2011 May 25, 2011	100	3.618.095.578	361.809.557.800
2013	Penawaran Umum Terbatas dengan HMETD (PUT IV) Limited Public Offering with Rights (PUT IV)	3.832.685.599	Juli 2013 July 2013	100	7.450.781.177	745.078.117.700

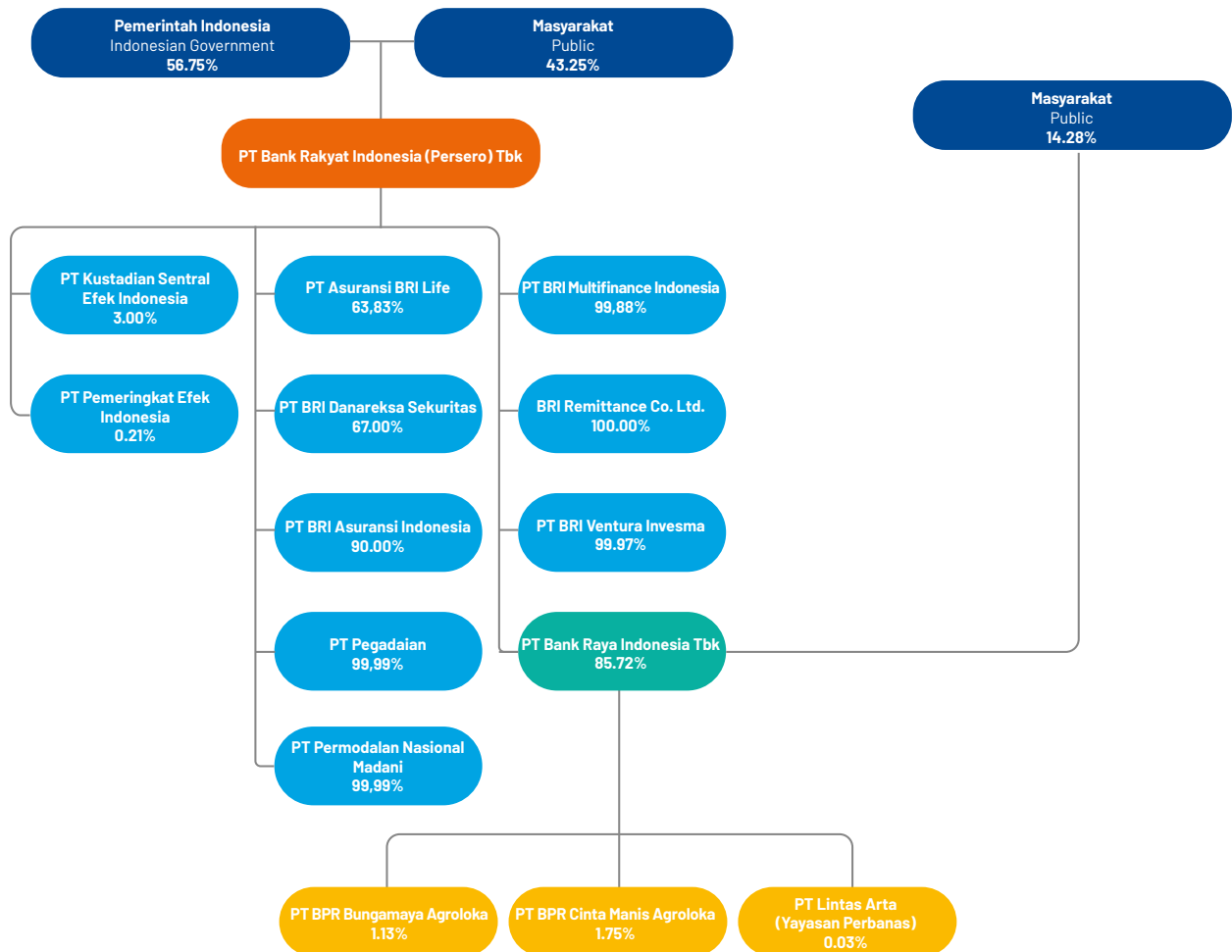
Tahun Year	Aksi Korporasi Corporate Action	Jumlah Saham Baru Total New Shares	Tanggal Pencatatan di Bursa Exchange Listing Date	Nilai Nominal Nominal (Rp)	Jumlah Saham Total Shares	Jumlah Modal Disetor Total Paid-in Capital
2015	Penawaran Umum Terbatas dengan HMETD (PUT V) Limited Public Offering with Rights (PUT V)	4.028.934.521	Juli 2015 July 2015	100	11.479.715.698	1.147.971.569.800
2016	Penawaran Umum Terbatas dengan HMETD (PUT VI) Limited Public Offering with Rights (PUT VI)	3.845.996.122	Desember 2016 December 2016	100	15.325.711.820	1.536.698.225.100
2017	Pelaksanaan Waran seri II (PUT VI) Execution of Series II Warrants (PUT VI)	612.937.654	Juni-Desember 2017 June-December 2017	100	15.938.649.474	1.539.968.225.100
	Penawaran Umum Terbatas dengan HMETD (PUT VII) Limited Public Offering with Rights (PUT VII)	2.515.555.707	Juli 2017 July 2017	100	18.454.205.181	1.791.253.795.800
2018	Penawaran Umum Terbatas dengan HMETD (PUT VIII) Limited Public Offering with Rights (PUT VIII)	2.889.085.049	26 September 2018 September 26, 2018	100	21.343.290.230	2.134.329.023.000
2021	Kepemilikan Hak Opsi Saham Pekerja dan Pengurus Perseroan (MESOP) Management & Employee Stock Option Plan	249.376.451	27 Mei 2021 May 27, 2021	100	21.592.666.681	2.159.266.668.100
2021	Kepemilikan Hak Opsi Saham Pekerja dan Pengurus Perseroan (MESOP) Management & Employee Stock Option Plan	99.314.846	14 September 2021 September 14, 2021	100	21.691.981.527	2.169.198.152.700
2021	Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) IX Capital Increase with Pre-emptive Rights (PMHMETD) IX	1.054.545.185	2 Desember 2021 December 2, 2021	100	22.746.526.712	2.274.652.671.200

Kronologi Penerbitan dan/atau Pencatatan Efek Lainnya Issuance and/or Other Securities Listing Chronology

Nama Obligasi dan Sukuk Name of Bonds and Sukuk	Tanggal Penerbitan Publication Date	Tanggal Jatuh Tempo Due Date	Tenor (Tahun) Tenor (Year)	Kupon Coupon	Mata Uang Currency	Nominal (dalam Rp miliar) Nominal (in Billion IDR)	Rating	
							2020	2021
Obligasi I Seri B Bond I Series B	7 Juli 2017 July 7, 2017	6 Juli 2022 July 6, 2022	5	8,50%	Rupiah	239.000.000.000	Id AA oleh Pefindo	Id AA oleh Pefindo

Struktur Grup Perusahaan

Company Group Structure



Penyertaan Saham

Equity Participation

Entitas Anak Kepemilikan Langsung Direct Ownership Subsidiaries	PT BPR Bungamayang Agroloka
Alamat Address	Jl. Jembatan Merah Kel. Negara Tulang Bawang Kec. Bungamayang Kota/Kab. Lampung Utara - 34554
Bidang Usaha Business Line	Bank Perkreditan Rakyat Rural Bank
Kepemilikan Saham Share Ownership	1,13%
Tahun Pendirian Year of Establishment	1991
Status Operasi Operational Status	Masih beroperasi Operating

Entitas Anak Kepemilikan Langsung Direct Ownership Subsidiaries	PT BPR Cinta Manis Agroloka
Alamat Address	Jl. Bangau No.13 Komplek PG UU Cinta Manis PTPN VII (Persero) Kel. Ketiau Kec. Lubuk Keliat Kota/Kab. Inderalaya - 30663
Bidang Usaha Business Line	Bank Perkreditan Rakyat
Kepemilikan Saham Share Ownership	1,75%
Tahun Pendirian Year of Establishment	1991
Status Operasi Operational Status	Masih beroperasi

Entitas Anak Kepemilikan Langsung Direct Ownership Subsidiaries	PT Aplikanusa Lintasarta
Alamat Address	- Menara Thamrin 12th Floor - Jl. M.H. Thamrin Kav.3 Jakarta 10250
Bidang Usaha Business Line	Informasi dan Komunikasi Information and Communication
Kepemilikan Saham Share Ownership	0,03%
Tahun Pendirian Year of Establishment	1988
Status Operasi Operational Status	Masih beroperasi

Kantor Akuntan Publik

Public Accounting Firm

Sesuai dengan Peraturan OJK No. 13/POJK.03/2017 Tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik Dalam Kegiatan Jasa Keuangan, disebutkan bahwa pihak yang menjalankan kegiatan jasa keuangan wajib menggunakan jasa Akuntan Publik dan Kantor Akuntan Publik.

Penggunaan jasa Akuntan Publik dan Kantor Akuntan Publik bertujuan untuk memberikan keyakinan bagi pengguna atas hasil evaluasi atau pengukuran informasi keuangan dan nonkeuangan berdasarkan suatu kriteria yang digunakan sebagai salah satu pertimbangan dalam pengambilan keputusan.

According to OJK Regulation No. 13/POJK.03/2017 on the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities, parties engaged in financial services activities are obliged to engage the services of a Public Accountant and a Public Accounting Firm.

Utilising the services of a Public Accountant and a Public Accounting Firm attempts to instil trust in users about the outcomes of the assessment or measurement of financial and non-financial information using a criteria that is used as one of the factors in decision-making.

Kebijakan Penunjukan Akuntan Publik dan Kantor Akuntan Publik

Public Accountants and Public Accounting Firms Appointment

Akuntan Publik ditunjuk oleh Pemegang Saham melalui forum RUPS. Oleh RUPS, penunjukan akuntan publik dipercayakan kepada Dewan Komisaris yang akan memutuskan berdasarkan usulan dari Direksi dengan alasan dan besarnya kompensasi yang diusulkan untuk auditor eksternal tersebut. Auditor eksternal harus independen dari pengaruh Direksi, Dewan Komisaris dan pihak yang berkepentingan di Bank.

Bank wajib menyediakan semua catatan akuntansi dan data penunjang yang diperlukan bagi audit Independen sehingga memungkinkan audit Independen memberikan pendapatnya tentang kewajaran, ketaat-azasan dan kesesuaian laporan keuangan Bank dengan Standar akuntansi Keuangan (SaK) Indonesia. audit Independen wajib memberitahu Bank bila ada kejadian dalam perusahaan yang tidak sesuai dengan peraturan perundang-undangan yang berlaku.

Auditor eksternal yang memeriksa laporan keuangan Bank tahun buku 2021 ditetapkan melalui RUPS tahunan berdasarkan rekomendasi dari Dewan Komisaris dan Komite Audit. Proses pemilihannya dilakukan sesuai dengan mekanisme pengadaan barang dan jasa yang berlaku. Pada tahun 2021 Bank Raya telah menunjuk Kantor Akuntan Publik Purwantono, Sungkoro & Surja untuk memeriksa buku-buku Bank tahun buku 2021.

Policy The Shareholders appoint public accountants via the GMS forum. The GMS vests the appointment of a public accountant in the Board of Commissioners, who will determine on the reasons and amount of remuneration recommended for the external auditor based on the Board of Directors' suggestion. External auditors must be completely independent of the Bank's Board of Directors, Board of Commissioners, and any interested parties.

Banks are expected to submit all accounting records and supporting data necessary for independent audits to express an opinion on the fairness, compliance, and conformance of the Bank's financial statements with Indonesian Financial Accounting Standards (SAK). Independent auditing is obliged to warn the Bank of any internal occurrences that violate relevant laws and regulations.

The external auditor who will review the Bank's financial accounts for the fiscal year ending December 31, 2021 is selected via the annual GMS on the basis of recommendations by the Board of Commissioners and Audit Committee. The selection procedure is conducted in line with the appropriate procurement method for goods and services. Bank Raya chose the Purwantono, Sungkoro & Surja Public Accounting Firm to audit the bank's records for the fiscal year 2021 in 2021.

Nama KAP Name of Public Accounting Firm	KAP Purwantono, Sungkoro, dan Surja (a member firm of Ernst & Young Global Limited)
Alamat Address	Gedung Bursa Efek Indonesia Jl Jenderal Sudirman Kav. 52-53 Jakarta Selatan 12190
Nama Akuntan Accountant's Name	Christophorus Alvin Kossim
Ijin Akuntan Accountant's Authorisation	No.237/KM.1/2020
Jasa yang Diberikan Services Offered	Audit umum atas Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2021 General audit of the Bank's Financial Statements for the year ended on December 31, 2021
Periode Penugasan Assignment Period	2021
Opini Opinion	
Biaya Fee	Rp1.575.000.000

Kronologis Penggunaan Jasa Akuntan Publik

Chronology of Public Accountant Services Use

Pembatasan penggunaan jasa audit atas informasi historis tahunan dari Akuntan Publik yang sama paling lama untuk 3 (tiga) tahun buku berturut-turut. Hal ini sesuai dengan Peraturan OJK Nomor 13/POJK.03/2017 tentang penggunaan Jasa Akuntan dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan tanggal 27 Maret 2017.

Restrictions on the use of audit services on annual historical information from the same Public Accountant for a maximum of three (three) consecutive financial years. This is in accordance with OJK Regulation 13/POJK.03/2017, dated March 27, 2017, regarding the use of Accountants and Public Accountant Firms in Financial Services Activities.

Tahun Buku Fiscal Year	Kantor Akuntan Publik Public Accounting Firm	Akuntan Accountant	Jasa yang Diberikan Services Offered	Biaya Fee
2021	KAP Purwantono, Sungkoro, dan Surja (STTD.KAP-03/PM.22/2018)	Christophorus Alvin Kossim (STTD.AP-31/PM.223/2020)	Audit umum atas Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2021 General audit of the Bank's Financial Statements for the year ended on December 31, 2021	Rp1.575.000.000
2020	KAP Purwantono, Sungkoro & Surja (STTD.KAP-03/PM.22/2018)	Christophorus Alvin Kossim (STTD.AP-31/PM.223/2020)	Audit umum atas Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2020 Audit of the Bank's Financial Statements for the fiscal year ended December 31, 2020 in its entirety	Rp1.490.000.000
2019	KAP Purwantono, Sungkoro & Surja (STTD.KAP-03/PM.22/2018)	Muhammad Kurniawan (STTD-AP-118/PM.22/2018)	Audit umum atas Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2019 Audit of the Bank's Financial Statements for the fiscal year ended December 31, 2019 in its entirety	Rp1.190.000.000
2018	KAP Purwantono, Sungkoro & Surja (S-139/PB.122/2015)	Danil Setiadi Handaja, CPA (04/PM.22/STTD-AP/2014)	Audit umum atas Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2018 Audit of the Bank's Financial Statements for the fiscal year ended December 31, 2018 in its entirety	Rp1.100.000.000
2017	KAP Purwantono, Sungkoro & Surja (S-706/PM.223/2015)	Danil Setiadi Handaja, CPA (04/PM.22/STTD-AP/2014)	Audit umum atas Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2017 Audit of the Bank's Financial Statements for the fiscal year ended December 31, 2017 in its entirety	Rp1.015.000.000

Jasa Lain yang Diberikan

Other Services Offered

Lembaga dan/atau Profesi Penunjang

Supporting Institutions and/or Professions

Biro Administrasi Efek

Securities Administration Bureau

Nama Name	PT Datindo Entrycom
Alamat Address	Jl. Hayam Wuruk No. 28, Jakarta 10120 Telp: (021) 350 8077 Fax : (021) 350 8078
Jasa yang diberikan Services Offered	1. Registrasi RUPS 2. Jasa Pelaksanaan HMETD 3. Jasa Administrasi Saham Tahunan 4. Jasa Administrasi Pasar Sekunder 1. GMS Registration 2. Pre-emptive Rights Services 3. Annual Shares Registrar Services 4. Secondary Market Registrar Services
Biaya Fee	Rp44.000.000,- (empat puluh empat juta rupiah) IDR 44,000,000,- (forty four million rupiah)
Periode Penugasan Assignment Period	2021

Kustodian

Custodian

Nama Name	Kustodian Sentral Efek Indonesia (KSEI)
Alamat Address	Gedung Bursa Efek Indonesia, Tower 1, Lt. 5 Jl. Jend. Sudirman kav. 52-53, Jakarta 12190 Indonesia Telp: (+62 21) 515 2855 Fax: (+62 21) 5299 1199
Jasa yang diberikan Services Offered	Jasa Kustodian Custodian Services
Biaya Fee	Rp22.000.000,- (dua puluh dua juta rupiah) IDR 22,000,000,- (twenty two million rupiah)
Periode Penugasan Assignment Period	2021

Notaris Notary

Nama Name	M. Nova Faisal, SH., Mkn
Alamat Address	Cyber 2 Tower, Lt 22F Jl. HR Rasuna Said Blok x-5 No.13, Jakarta Selatan Telp : (021) 29021312 Fax : (021) 29021314
Jasa yang diberikan Services Offered	Jasa Notaris Notary Services
Biaya Fee	Rp45.500.000,- (empat puluh lima juta lima ratus ribu rupiah) IDR 45,500,000,- (forty five million five hundred thousand rupiah)
Periode Penugasan Assignment Period	2021

Lembaga Pemeringkat Rating Agencies

Nama Name	PT Pemeringkat Efek Indonesia (PEFINDO)
Alamat Address	Panin Tower Senayan City Lantai 17, Jl. Asia Afrika Lot 19, Jakarta 10270 Telp: (021) 7278 2380 Fax: (021) 72782370
Jasa yang diberikan Services Offered	1. Jasa pemeringkatan Obligasi 2. Jasa pemeringkatan Perusahaan 1. Bond rating service 2. Company rating service
Biaya Fee	Rp125.000.000,- (seratus dua puluh lima juta rupiah). IDR 125,000,000,- (one hundred and twenty five million rupiah).
Periode Penugasan Assignment Period	2021

Wali Amanat Trustee

Nama Name	PT Bank Negara Indonesia (Persero) Tbk
Alamat Address	Jl. Jend Sudirman Kav. 1 Jakarta Pusat 10220 Telp : +6221-5728387 Fax : +6221-5728053
Jasa yang diberikan Services Offered	Jasa Wali Amanat Trustee Services
Biaya Fee	Rp60.000.000,- (enam puluh juta rupiah) IDR 60,000,000,- (sixty million rupiah)
Periode Penugasan Assignment Period	2021

Bursa Efek Indonesia Indonesia Stock Exchange

Nama Name	PT Bursa Efek Indonesia
Alamat Address	Indonesia Stock Exchange Building, 1st Tower Jl. Jend. Sudirman Kav 52-53 Jakarta Selatan 12190, Indonesia
Jasa yang diberikan Services Offered	Jasa Pencatatan Tahunan Annual Listing Service
Biaya Fee	Rp275.000.000,- (dua ratus tujuh puluh lima juta rupiah) IDR 275,000,000,- (two hundred and seventy five million rupiah)
Periode Penugasan Assignment Period	2021

/ BAB 4

ANALISA DAN PEMBAHASAN MANAJEMEN MANAGEMENT ANALYSIS AND DISCUSSION





Tinjauan Ekonomi dan Industri

A Summary Analysis of The Economy and Industry

Analisis Ekonomi Global

An Analysis of The Global Economic Situation

Setelah melalui fase yang sangat berat di tahun 2020, ekonomi global kembali menggeliat di tahun 2021. Proses pemulihan ekonomi dari dampak pandemi Covid-19 telah menunjukkan kemajuan yang sangat baik. Sebagian besar negara di dunia sudah dapat lepas dari jurang resesi ekonomi yang disebabkan oleh pandemi Covid-19.

Di tahun 2021, sebagian besar pemerintah negara di dunia mengambil kebijakan yang nyaris sama, yaitu fokus pada bidang kesehatan dan ekonomi. Anggaran yang besar digelontorkan untuk pengadaan vaksin dan peningkatan kualitas dan kapasitas fasilitas kesehatan. Sedangkan di bidang ekonomi dengan cara memberikan berbagai stimulus fiskal dan moneter kepada pelaku usaha serta program jaring pengaman sosial bagi masyarakat yang terdampak.

Kebijakan tersebut juga didukung oleh kebijakan bank sentral yang pada umumnya tidak menaikkan tingkat suku bunga sepanjang tahun 2021.

Selain itu, program vaksinasi yang secara gencar dilaksanakan di hampir seluruh negara di dunia menjadi *game changer*. Melalui program vaksinasi tersebut ditujukan agar terbentuknya *herd immunity*, sehingga masyarakat dapat kembali menjalankan aktivitasnya. Kegiatan ekonomi telah kembali berjalan dengan cukup baik.

Melihat perkembangan yang sangat baik tersebut, pada Januari 2022, Lembaga Dana Moneter Internasional (IMF) dalam laporan *World Economic Outlook* memprediksi pertumbuhan ekonomi global tahun 2021 akan mencapai 5,9%. Prediksi tersebut jauh lebih tinggi dibandingkan prediksi yang disampaikan tahun sebelumnya yaitu sebesar 4,4%.

Namun, progres pemulihan ekonomi yang sangat baik tersebut memicu munculnya permasalahan baru. Dunia terancam mengalami krisis energi akibat kelangkaan minyak mentah dan batu bara yang proses produksinya terganggu selama masa pandemi. Hal tersebut membuat harga minyak mentah dan batu bara melonjak signifikan di tahun 2021, sehingga berdampak pada proses produksi barang dan memicu terjadinya inflasi.

Selain itu, proses pemulihan ekonomi yang berjalan cukup baik tersebut membuat bank sentral di beberapa negara mulai menarik sejumlah kebijakan pelonggar, namun belum berencana untuk menaikkan suku bunga. Bank Sentral Amerika Serikat, The Federal Reserve (The Fed) mulai mengurangi program pembelian obligasi atau *tapering off* pada November 2021. Langkah tersebut kemudian diikuti oleh Bank Sentral Eropa (ECB).

After a challenging year in 2020, the global economy will rebound in 2021. The economic recovery process following the impact of the Covid-19 outbreak has made significant progress. The majority of the world's countries have been able to avoid the abyss of economic recession brought about by the Covid-19 pandemic.

By 2021, the majority of countries worldwide will pursue a similar agenda, focusing on health and the economy. A significant portion of the budget is allocated to vaccine procurement and the enhancement of the quality and capacity of health facilities. Meanwhile, in the economic sector, through giving various fiscal and monetary stimulus to businesses and affected communities, as well as social safety net programmes.

This approach is further bolstered by the central bank's decision to refrain from raising interest rates in general until 2021.

Additionally, the vaccination programme, which is being adopted extensively in practically every country on the planet, has become a game changer. The immunisation programme is meant to develop herd immunity, allowing people to resume their normal activities. Economic activity has restarted in a rather robust manner.

Considering this good improvement, the International Monetary Fund (IMF) forecasts that global economic growth will reach 5.9% in 2021 in its World Economic Outlook report. This forecast is significantly higher than the previous year's forecast of 4.4%.

However, the economic recovery's rapid growth has resulted in the rise of new difficulties. The globe faces an energy crisis as a result of a lack of crude oil and coal, the production processes of which were disrupted during the pandemic. This resulted in a huge increase in the price of crude oil and coal in 2021, disrupting the manufacturing process and triggering inflation.

Additionally, the robust economic recovery has prompted central banks in numerous countries to begin withdrawing a number of easing programmes, albeit without intending to raise interest rates. The Federal Reserve, the United States' central bank (The Fed), began slowing or tapering down its bond-buying programme in November 2021. The European Central Bank (ECB) adopted a similar policy.

Kebijakan The Fed dan ECB tersebut memberikan dampak terhadap ekonomi, nilai tukar dan pasar modal di banyak negara, termasuk Indonesia.

Hal tersebut mengindikasikan bahwa perekonomian global masih sangat rentan terhadap setiap perkembangan yang terjadi. Karena itu pula, IMF memprediksi pertumbuhan ekonomi global akan kembali melambat di tahun 2022, yaitu sebesar 4,9%. Pertumbuhan ekonomi global tahun 2022 akan sangat dipengaruhi oleh pemerataan akses terhadap vaksin dan mutasi virus yang diperkirakan masih akan terjadi.

The Federal Reserve and European Central Bank policies have impacted the economies, exchange rates, and capital markets of a number of nations, including Indonesia.

This demonstrates that the global economy is extremely vulnerable to any future changes. As a result, the IMF forecasts that global economic growth would decelerate to 4.9% in 2022. In 2022, global economic growth will be significantly influenced by equal access to vaccines and virus mutations that are still expected to occur.

Analisis Ekonomi Nasional

Analysis of The National Economic Situation

Perekonomian Indonesia tahun 2021 masih menghadapi masalah yang sama seperti tahun sebelumnya, yaitu pandemi Covid-19. Bahkan, hingga akhir kuartal I tahun 2021, ekonomi Indonesia masih mengalami kontraksi 0,74%, padahal di saat yang sama sebagian besar negara di dunia telah berhasil lepas dari jerat resesi ekonomi.

Pemerintah dan semua pihak bekerja keras untuk menanggulangi pandemi, khususnya untuk menekan tingkat penyebaran Covid-19 di Indonesia. Sejalan dengan itu, Pemerintah juga berupaya untuk dapat kembali menggerakkan roda ekonomi sehingga pembangunan ekonomi nasional dapat kembali ke track yang benar.

Di bidang kesehatan, Pemerintah terus meningkatkan kualitas dan kapasitas fasilitas kesehatan. Sejalan dengan itu, pemerintah juga menggelontorkan anggaran yang sangat besar untuk menjalankan program vaksinasi bagi seluruh warga negara secara gratis. Berdasarkan data Kementerian Kesehatan, hingga akhir tahun 2021, sudah lebih dari 161 juta warga yang telah menerima vaksin dosis pertama dan 113 juta warga yang telah menerima dosis lengkap.

Untuk menekan laju penyebaran Covid-19, Pemerintah menerapkan kebijakan Pemberlakuan Pembatasan Kegiatan Masyarakat (PPKM). Kebijakan tersebut terbukti berhasil menekan penyebaran Covid-19 di Indonesia dengan sangat signifikan.

Sejalan dengan pemberlakuan PPKM, Pemerintah juga telah mengeluarkan sejumlah paket stimulus fiskal skala besar melalui Program Pemulihan Ekonomi Nasional (PEN). Dalam aspek jumlah anggaran pemerintah yang diperuntukkan untuk mengurangi dampak negatif dari pandemi Covid-19. Tahun 2021, alokasi anggaran untuk program PEN meningkat menjadi Rp744,7 triliun dari Rp 695,2 triliun di tahun 2020.

The Indonesian economy faces the same challenges in 2021 as it had the previous year, particularly the Covid-19 epidemic. Indeed, until the end of the first quarter of 2021, the Indonesian economy continued to decrease by 0.74%, despite the fact that the majority of the world's economies had escaped recession.

The government and all parties are putting up significant effort to contain the pandemic, particularly to halt the spread of Covid-19 in Indonesia. Additionally, the Government is attempting to re-energize the economy in order to re-establish a sustainable path for national economic development.

The government continues to invest in the health sector, enhancing the quality and capacity of health facilities. Additionally, the government spent a sizable portion of its money on a free immunisation programme for all citizens. According to Ministry of Health figures, more than 161 million people will have received the first dose of vaccine and 113 million will have received the entire dose by the end of 2021.

To combat the spread of Covid-19, the government developed the Community Activity Restrictions Policy (PPKM). This programme has been quite effective at containing the development of Covid-19 in Indonesia.

In addition to implementing PPKM, the government has released a series of large-scale fiscal stimulus packages via the National Economic Recovery Program (PEN). In terms of the government budget allocated to mitigating the negative effects of the Covid-19 epidemic. The PEN program's budget allocation will grow to IDR 744.7 trillion in 2021, up from IDR 695.2 trillion in 2020.

Program PEN merupakan bentuk respons kebijakan yang ditempuh oleh Pemerintah dalam upaya menjaga dan mencegah aktivitas usaha dari pemburukan lebih lanjut, mengurangi semakin banyaknya pemutusan hubungan kerja dengan memberikan subsidi bunga kredit bagi debitur usaha mikro, kecil, dan menengah yang terdampak, mempercepat pemulihan ekonomi nasional, serta untuk mendukung kebijakan keuangan negara.

Pemerintah tidak hanya menggelontorkan dana dukungan dari sisi permintaan masyarakat tapi juga membuka keran permintaan termasuk mendukung pembiayaan bagi UMKM dengan memberikan stimulus subsidi bunga kredit agar sektor UMKM dapat kembali bergerak. Pemerintah juga berupaya meningkatkan konsumsi dalam bentuk bantuan sosial, ada juga stimulus pelonggaran PPnBM, dan stimulus PPN, untuk mendorong masyarakat berbelanja.

Melalui berbagai kebijakan tersebut, ekonomi Indonesia tumbuh lebih baik di tahun 2021. Menurut data Badan Pusat Statistik (BPS), ekonomi Indonesia tahun 2021 tumbuh 3,69%. Pertumbuhan tersebut jauh lebih baik dibandingkan tahun sebelumnya, dimana ekonomi Indonesia mengalami kontraksi 2,07%. Namun demikian, jika dibandingkan dengan era sebelum pandemi, pertumbuhan ekonomi nasional masih belum kembali.

Pemerintah juga mampu menjaga tingkat inflasi pada level yang rendah. Berdasarkan data Bank Indonesia, tingkat inflasi tahun 2021 mencapai 1,87%. Hal ini membuat ekonomi nasional tidak mengalami gejolak yang berarti meski roda ekonomi masih berputar lebih lambat dibandingkan kondisi normal.

Neraca perdagangan Indonesia tahun 2021 juga tercatat mengalami surplus yang cukup baik, yaitu sebesar US\$ 35,34 miliar, jauh lebih tinggi dibandingkan tahun sebelumnya sebesar US\$ 21,74 miliar.

Berkaca pada pertumbuhan yang positif di tahun 2021, Bank Indonesia (BI) optimis pertumbuhan ekonomi yang positif akan terus berlanjut di tahun 2022. BI memprediksi pertumbuhan ekonomi Indonesia tahun 2022 akan berada pada kisaran 4,7%-5,4%. Lembaga pemeringkat *Fitch Ratings* bahkan memperkirakan pertumbuhan ekonomi Indonesia pada tahun 2022 akan meroket ke 6,8%.

Pertumbuhan yang kuat tersebut masih didorong oleh kinerja ekspor, ditambah dengan peningkatan kinerja konsumsi rumah tangga dan juga investasi.

The PEN programme is a policy reaction by the government to sustain and avoid further deterioration of company activities, reduce layoffs, and accelerate national economic recovery by giving credit interest subsidies to impacted micro, small, and medium firm borrowers.

The government not only distributes support funds from the public demand side, but also opens the demand valve, notably by supporting MSMEs' financing through a credit interest subsidy stimulus. Additionally, the government is attempting to increase consumption through social assistance, a stimulus for easing PPnBM, and a VAT stimulus to encourage people to shop.

The Indonesian economy will grow more rapidly in 2021 as a result of these varied initiatives. Indonesia's GDP would increase 3.59% in 2021, according to estimates from the Central Statistics Agency (BPS). This was a significant improvement over the previous year, when the Indonesian GDP dropped by 2.07%. However, in comparison to the pre-pandemic era, national economic growth has yet to resume.

Additionally, the government is able to maintain a low level of inflation. According to Bank Indonesia data, inflation would reach 1.87% in 2021. This keeps the national economy from experiencing substantial changes even though the economy is still operating at a slower pace than typical.

Indonesia's trade balance also posted a modest surplus in 2021, totaling US\$ 35.34 billion, significantly higher than the previous year's figure of US\$ 21.74 billion.

Bank Indonesia (BI) is optimistic that strong economic growth would continue in 2022, based on positive growth in 2021. BI forecasts Indonesia's economic growth to be between 4.7% and 5.4% in 2022. Fitch Ratings expects that Indonesia's economic growth will soar to 6.8% in 2022.

This robust growth is still being fueled by export performance, as well as increased household consumption and investment.

Analisis Industri Perbankan

Banking Industry Analysis

Di tengah berbagai tantangan yang dihadapi sepanjang tahun 2021, industri perbankan masih dapat menjalankan fungsi intermediasinya dengan baik. Secara umum, kinerja industri perbankan tahun 2021 lebih baik dibandingkan tahun sebelumnya. Hal tersebut juga tak lepas dari kebijakan dari pemerintah dan Otoritas Jasa Keuangan (OJK) juga memberikan berbagai stimulus bagi industri perbankan agar dapat tetap menjalankan fungsi intermediasinya dengan baik.

Sepanjang tahun 2021, industri perbankan berhasil menyalurkan kredit sebesar Rp5.768,6 triliun, meningkat 5,24% dari tahun sebelumnya Rp5.447,5 triliun. Pertumbuhan kredit terjadi di hampir seluruh sektor usaha dan untuk semua jenis penggunaan. Pertumbuhan kredit tersebut juga turut mendorong pertumbuhan aset industri perbankan yang tumbuh menjadi Rp10.112,3 triliun dari Rp8.780,7 triliun di tahun 2020.

Dana pihak ketiga (DPK) yang berhasil dihimpun bank tahun 2021 sebesar Rp7.479,5 triliun, meningkat 12,21% (yoy) dari tahun sebelumnya. Pertumbuhan DPK tahun 2021 utamanya didorong oleh produk tabungan rupiah yang tumbuh 12,57% menjadi Rp2.182,7 triliun, sedangkan produk deposito rupiah tumbuh 4,27% dan produk giro rupiah tumbuh 17,15%.

Rasio kecukupan modal bank tahun 2021 juga meningkat menjadi 25,66% dari 23,89% di akhir tahun 2020.

Namun demikian, di balik pertumbuhan yang baik tersebut, industri perbankan harus memberikan perhatian yang besar terhadap kualitas kredit yang diberikan. Pada akhir tahun 2021, rasio kredit bermasalah (NPL) bersih, masih relatif tinggi yaitu sebesar 3,00%.

Kedepannya Perbankan nasional masih akan menghadapi sejumlah tantangan yang perlu diatasi, baik bersifat jangka pendek maupun struktural. Dalam jangka pendek, ketidakpastian berakhirnya pandemi Covid-19 masih membayangi proses pemulihan ekonomi yang dapat berdampak terhadap kinerja perbankan. Sedangkan secara struktural, tantangan yang masih harus dihadapi perbankan yaitu:

1. Perubahan ekosistem dan ekspektasi *stakeholder* akan layanan digital yang semakin masif terlebih di masa pandemi Covid-19.
2. Ekspektasi pemerintah dan masyarakat terhadap sektor jasa keuangan terutama perbankan dalam pemulihan ekonomi nasional.
3. Tuntutan kepada regulator terkait pembenahan internal, baik dari sisi pengaturan, pengawasan dan perizinan sehingga dapat lebih *agile*, adaptif, dan mampu mendukung ekosistem baru industri perbankan.

In the midst of various challenges faced throughout 2021, the banking industry was still able to carry out its intermediation function well. In general, the performance of the banking industry in 2021 is better than the previous year. This is also inseparable from the policies of the government and the Financial Services Authority (OJK) which also provides various stimuli for the banking industry so that they can continue to carry out their intermediation function properly.

Throughout 2021, the banking industry managed to disburse loans of IDR 5,768.6 trillion, an increase of 5,24% from the previous year of IDR 5,447.5 trillion. Credit growth occurred in almost all business sectors and for all types of use. The credit growth also contributed to the growth of banking industry assets, which grew to IDR 10,112.3 trillion from IDR 8,780.7 trillion in 2020.

Third-party funds (DPK) collected by the bank in 2021 totaled Rp7,479.5 trillion, a 12.21 % (yoy) increase over the previous year. The growth of deposits in 2021 was mainly driven by rupiah savings products which grew by 12.57% to IDR 2,182.7 trillion, while rupiah time deposits grew by 4.27% and rupiah demand deposits grew by 17.15%.

The bank's capital adequacy ratio in 2021 also increased to 25.66% from 23.89% at the end of 2020.

However, behind this good growth, the banking industry must pay great attention to the quality of loans provided. At the end of 2021, the net non-performing loan (NPL) ratio was still relatively high at 3.00%.

In the future, the national banking system will still face a number of challenges that need to be addressed, both short-term and structural in nature. In the short term, uncertainty over the end of the Covid-19 pandemic still overshadows the process of economic recovery which could impact banking performance. Meanwhile, structurally, the challenges that banks still have to face are:

1. Changes in the ecosystem and stakeholder expectations for digital services are increasingly massive, especially during the Covid-19 pandemic.
2. Government and public expectations of the financial services sector, especially banking, in the recovery of the national economy.
3. Demands to regulators related to internal improvements, both in terms of regulation, supervision and licensing so that they can be more agile, adaptive, and able to support the new ecosystem of the banking industry.

Tinjauan Operasional

Operational Review

Strategi Bank Raya

Bank Raya's Strategy

Disrupsi teknologi di industri perbankan merupakan sebuah keniscayaan. Digitalisasi dan penetrasi *digital platform* meningkat seiring dengan kepemilikan *smartphone* di industri perbankan. Perkembangan teknologi yang berjalan dengan sangat cepat juga telah mengubah perilaku konsumen, yang pada akhirnya akan berpengaruh terhadap kegiatan usaha dan hasil usaha pelaku di industri perbankan.

Merebaknya pandemi Covid-19 sejak kuartal pertama tahun 2020 yang membatasi mobilitas masyarakat juga semakin mempercepat perubahan perilaku nasabah. Selain itu, perkembangan teknologi digital yang berpengaruh terhadap perubahan perilaku konsumen dalam bertransaksi di perbankan.

Adaptasi masyarakat terhadap digitalisasi dalam berbagai aspek kehidupan sehari-hari akan semakin tinggi, terutama di masyarakat Urban di area perkotaan. Sekitar 56% dari total 268 juta masyarakat Indonesia saat ini merupakan masyarakat urban yang sangat lekat dengan berbagai produk digital, hal tersebut dikarenakan semakin tingginya pengguna aktif internet di Indonesia yaitu sekitar 65% dari masyarakat Indonesia atau sekitar 170 juta orang adalah pengguna aktif internet. Tingginya jumlah pengguna internet juga selaras dengan tingginya jumlah *smartphone* di Indonesia, sekitar 355 juta *smartphone* beredar di masyarakat melebihi jumlah penduduk Indonesia, dengan active media social sekitar 160 juta orang. Dalam 5 tahun terakhir, jumlah pengguna internet dan penetrasi *smartphone* meningkat sekitar 10%.

Bank Raya sebagai digital attacker yang masuk ke ekosistem digital mewakili BRI Group, melakukan langkah transformasi digital. Strategi tersebut diambil dalam rangka menghadapi era digitalisasi Perbankan ditambah dengan persaingan dengan *fintech*.

Sejak 2019, Bank berhasil meluncurkan pinjaman digital melalui aplikasi digital Pinjam Tenang atau disebut PINANG. PINANG adalah pinjaman berbasis digital yang merupakan produk pinjaman bank berbasis aplikasi pertama di Indonesia. Aplikasi PINANG sudah *fully digital* dengan sistem digital *verification*, *digital scoring* dan *digital signature*.

Pada tahun 2020, selain melakukan pengembangan produk Bank melakukan penetrasi ke ekosistem digital melalui *partnership* atau kolaborasi dengan berbagai perusahaan *Financial Technology* (*Fintech*). *Fintech* memiliki keunggulan dengan proses yang cepat, lebih mudah dan serba digital. Kolaborasi ini merupakan peluang yang baik untuk membuka peluang bisnis selagi Bank mempersiapkan model bisnis baru. Selain memberikan akses pendanaan kepada *Fintech*, Bank juga memberikan dukungan layanan perbankan bagi *Fintech*.

Technological disruption is required in the banking industry. Digitalisation and platform penetration are expanding in lockstep with smartphone ownership the banking business. Consumer behaviour has also shifted as a result of rapid technological advancements, which will impact the banking industry's commercial activities and outcomes.

Since the emergence of the Covid-19 pandemic in the first quarter of 2020, which has curtailed people's movement, changes in customer behaviour have intensified. Additionally, the advancement of digital technology has an effect on customer behaviour when it comes to financial transactions.

The community's adaption to digitalization in numerous parts of daily life will be greater, particularly in metropolitan regions. Around 56% of the total 268 million Indonesians today are urban residents who are extremely attached to various digital products. This is due to the increasing number of active internet users in Indonesia, which now accounts for approximately 65% of the total population, or approximately 170 million people. The large number of internet users correlates with the high number of smartphones in Indonesia, where around 355 million cellphones outnumber the country's population, with approximately 160 million individuals participating on social media. The number of internet users and smartphone penetration have increased by around 10% over the last five years.

Bank Raya, as a digital attacker who entered the BRI Group's digital ecosystem, took efforts toward digital transformation. This strategy was adopted in response to the era of banking digitization and competition from *fintech*.

Since January 2019, the Bank has successfully implemented digital loans using the digital application Pinjam Tenang, or PINANG. PINANG is a digital-based loan product that is Indonesia's first application-based bank lending product. PINANG is a totally digital application with a digital verification, grading, and signature system.

By 2020, the Bank will have penetrated the digital ecosystem through partnerships or collaborations with a variety of Financial Technology (*Fintech*) enterprises. *Fintech* offers the advantage of being a quick, simple, and entirely digital procedure. This collaboration provides an excellent opportunity to establish new commercial relationships while the Bank develops a new business model. In addition to providing finance for *Fintech*, the Bank also supports *Fintech* with financial services.

Tahun 2021 Bank secara resmi bertransformasi menjadi Bank Digital. Saat ini Bank telah mencanangkan aspirasi baru yaitu *"The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy"*. Dengan aspirasi ini, maka Bank akan bertransformasi dalam segala hal antara lain aspek *Human Capital, Network, Infrastructure, Model Bisnis, Produk dan Layanan*, serta Portofolio Kredit baik dalam hal *ticket size* maupun kualitas. Bank Raya berkomitmen untuk membangun pondasi keuangan yang kuat untuk *business model* yang baru dan fokus untuk menyalurkan pendanaan berbasis digital kepada segmen market yang baru, terutama segmen *Gig Economy*.

Untuk memberikan layanan prima bagi para *Gig Workers*, Bank Raya menginisiasi *Community Branch*, terutama untuk melayani komunitas ekonomi sektor informal (*gig economy*) dan agen-agen fintech di beberapa area untuk membangun infrastruktur digital bagi sektor *gig economy* dengan melalui *customer experience* yang koheren.

Dalam pengembangan bisnis, strategi umum Bank Raya yang akan dilakukan adalah:

1. Menentukan Visi Baru Bank yaitu *"The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy"*.
2. Melaksanakan proses transformasi bisnis Bank ke arah Bank Digital yang terdiri dari 3 pilar utama, yaitu *Digital, Digitize, dan Revamp*. Serta memperkuat beberapa aspek yang menjadi *enablers* yaitu *Good Corporate Governance (GCG), Internal Capability* di Teknologi dan Informasi, memperluas *Partnership* dengan berbagai entitas yang relevan dengan target pelanggan Bank untuk membangun ekosistem bisnis.
3. Menghadirkan layanan perbankan berkualitas berbasis digital dan memiliki dampak bagi pertumbuhan ekonomi Indonesia khususnya sektor *"Gig Economy"* pada segmen mikro dan kecil.
4. Menerapkan tata kelola perusahaan yang baik (*Good Corporate Governance*) dan memberikan manfaat yang optimal bagi para *stakeholders*.

Aspek Pemasaran Marketing Aspect

Bank Raya melakukan kegiatan usaha berupa pengumpulan dana dan penyaluran kredit serta peningkatan penyedia jasa perbankan melalui pengembangan produk dan layanan yang *customer oriented*. Dalam industri jasa perbankan, produksi adalah hasil dari kegiatan pemasaran produk dan jasa yang dihasilkan.

Selama kegiatan pemasarannya, Bank Raya melakukan beberapa strategi diantaranya adalah melalui *Business-to-Business & Business to Business to Customer Partnership* dan juga melalui *Direct Sales*.

The Bank has transformed officially to a digital bank in 2021. The Bank has just unveiled a new vision, titled *"The Best Digital Bank by Becoming a House of Fintech and a Home for the Gig Economy."* With this ambition, the Bank will undergo a transformation in all areas, including human capital, network and infrastructure, business models, products and services, and credit portfolios, both in terms of ticket size and quality. Bank Raya is devoted to establishing a solid financial foundation for a new business model and is focused on channelling digital-based funding to new market segments, particularly the *Gig Economy*.

To provide exceptional service to *Gig Workers*, Bank Raya initiate to establish a *Community Branch* dedicated to serving the informal economic community (*gig economy*) and fintech agents in several areas, with the goal of developing digital infrastructure for the *gig economy* sector through a consistent customer experience.

Bank Raya's general business development strategy include the following:

1. Determining the Bank's New Vision, namely *"The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy"*.
2. Carry out the Bank's business transformation process towards a Digital Bank which consists of 3 main pillars, namely *Digital, Digitize, and Revamp*. As well as strengthening several aspects that become enablers, namely *Good Corporate Governance (GCG), Internal Capability* in Information and Technology, expanding *Partnerships* with various entities that are relevant to the Bank's target customers to build a business ecosystem.
3. Presenting quality banking services based on digital and having an impact on Indonesia's economic growth, especially the *"Gig Economy"* sector in the micro and small segments.
4. Implement good corporate governance and provide optimal benefits for stakeholders.

Bank Raya engages in commercial activities such as fundraising and lending, as well as expanding the number of banking service providers through the development of customer-centric goods and services. Production occurs as a result of marketing operations for the products and services provided in the financial service industry.

Bank Raya utilised a variety of marketing methods, including B2B and Business to Business & Business to Business to Customer partnerships, as well as direct sales.

Selanjutnya beberapa kegiatan pemasaran yang dilakukan oleh Bank Raya antara lain adalah :

1. Mengadakan pendekatan hingga perjanjian kerjasama dengan beberapa *partner fintech P2P Lending* (saat ini Bank Raya telah memiliki beberapa partner antara lain adalah (*Investree, Koinworks, Modal Rakyat, iGrow, Danain, dan TaniFund*) yang kemudian Bank Raya menyalurkan pinjamannya kepada *End Customer* melalui *Partner-Partner* yang telah disebutkan.
2. Mengadakan pendekatan hingga perjanjian kerjasama untuk beberapa partner untuk pemasaran produk Pinang Performa yang kemudian partner menyalurkan produk pinjaman Pinang Performa Bank Raya ke *merchant-merchant* yang bekerjasama dengan partner
3. Mengadakan pendekatan hingga perjanjian kerjasama untuk beberapa *partner* untuk penyaluran Pinjaman Pinang Flexi melalui beberapa perusahaan yang memiliki *payroll* dari Bank Raya dan Bank BRI
4. Melakukan beberapa *campaign program* dan promo terkait dengan produk-produk Bank Raya
5. Melakukan pemasaran secara *Direct Sales* kepada *End Customer*

Strategi Pemasaran Digital Banking

1. Strategi Pinang Performa
Dalam rangka mendukung transformasi bisnis Bank Raya, Pinang Performa sebagai salah satu model bisnis baru diharapkan dapat memberikan kontribusi kepada Bank Raya. Strategi Pinang Performa tahun 2021-2023 adalah sebagai berikut:
 - a. Pinjaman segmen mikro (s.d. Rp 100 juta) dengan fokus pembiayaan pada *merchant-supplier ecosystem*.
 - b. Pengembangan aplikasi digital yang akan digunakan oleh Tenaga Pemasar (*Account Officer*) untuk melakukan proses inisiasi prakarsa pinjaman secara cepat dan mudah dengan tingkat risiko yang terukur.
 - c. Model bisnis yang dikembangkan melalui 2 pendekatan model bisnis, optimalisasi *value chain Fintech Ecosystem Partnership* dan *Agent & Community Partnership* sebagai *Lead Acquisition*.
 - d. Pengembangan *Credit Scoring* yang komprehensif sehingga proses analisa pinjaman dapat dilakukan lebih objektif dan cepat serta memberikan kepastian kepada *Customer*.
2. Strategi Pinang Flexi
Dalam rangka mendukung transformasi bisnis Bank Raya, Pinang Flexi sebagai salah satu produk yang sudah "Live" terus melakukan pengembangan-pengembangan untuk memberikan kontribusi terbaik kepada Bank Raya. Strategi Pinang Konsumer tahun 2021-2023 adalah sebagai berikut:
 - a. Peningkatan loyalitas nasabah melalui pengembangan *feature Privilege* (*pre-approve* pinjaman) khusus untuk debitur/nasabah terpilih serta program marketing untuk meningkatkan *awareness* nasabah kepada PINANG.

Additionally, Bank Raya engages in a variety of marketing efforts, including the following:

1. Approaching to cooperation agreements with several P2P Lending fintech partners (currently Bank Raya already has several partners including (*Investree, Koinworks, Modal Rakyat, iGrow, Danain, and TaniFund*) which Bank Raya then distributes loans to End Customers through Partners - The partners that have been mentioned.
2. Conducting approaches to cooperation agreements for several partners for the marketing of Pinang Performa products, which then partners distribute Pinang Performa Bank Raya loan products to merchants who cooperate with partners
3. Conducting approaches to cooperation agreements for several partners for the distribution of Pinang Flexi Loans through several companies that have payroll from Bank Raya and Bank BRI
4. Conducting several campaign programs and promos related to Bank Raya products
5. Doing direct sales marketing to End Customers

Digital Banking Marketing Strategy

1. Pinang Performa Strategy
In order to support Bank Raya's business transformation, Pinang Performa as a new business model is expected to contribute to Bank Raya. The Pinang Performa Strategy for 2021-2023 is as follows:
 - a. Micro segment loans (up to IDR 100 million) with a financing focus on the merchant - supplier ecosystem.
 - b. Development of digital applications that will be used by Marketers (*Account Officers*) to initiate the loan initiative initiation process quickly and easily with a measurable level of risk.
 - c. The business model developed through 2 business model approaches, value chain optimization of Fintech Ecosystem Partnership and Agent & Community Partnership as Lead Acquisition.
 - d. Development of a comprehensive Credit Scoring so that the loan analysis process can be carried out more objectively and quickly as well as provide certainty to customers.
2. Pinang Flexi Strategy
In order to support Bank Raya's business transformation, Pinang Flexi as one of the "Live" products continues to make developments to provide the best contribution to Bank Raya. The Areca Consumer Strategy for 2021 - 2023 is as follows:
 - a. Increasing customer loyalty through the development of Privilege features (*pre-approve* loans) specifically for selected debtors/customers as well as marketing programs to increase customer awareness of PINANG.

- b. Membuka akses *market share* ke nasabah *existing* BRI dan Bank Raya.
- c. Perubahan model bisnis dari B2C menjadi B2B2C melalui pengembangan Pinang API dan Webview sehingga dapat berintegrasi dengan pihak ketiga.
- d. Pengembangan *Paylater* untuk melayani kebutuhan pinjaman <30 hari.
- e. Inisiasi kerjasama dengan pihak ketiga baik untuk *e-commerce*, agen, *fintech* dan lainnya untuk meningkatkan ekspansi pinjaman konsumen.
- f. Melakukan *breakdown* target Pinang Konsumer ke unit kerja untuk mendukung peningkatan *outstanding* dan perusahaan kerjasama.
- g. Pengembangan *Credit Scoring* sehingga dapat dilakukan perluasan target *market* Pinang menjadi *existing customer* (2021) dan *mass market* (2022).
- h. Pengembangan sistem autodebet yang lebih *advance* untuk menjaga kolektibilitas pinjaman dan memitigasi pemburukan kualitas.

3. Strategi Channeling

Untuk mendukung pertumbuhan kredit yang inovatif dan sebagai *new business model proportion*, maka dalam pemberian kredit pada sektor *channeling* akan fokus pada pembiayaan kepada sektor produktif di Agri dan non agri serta sektor konsumtif melalui *partner P2P Lending* dengan fokus strategi:

- a. *Re-Focussing* pembiayaan *channeling P2P* pada segmen Retail Komersial dan Konsumer dengan tetap memperhatikan Tata Kelola *Channeling P2P Lending*.
- b. Menyusun Kebijakan dan Prosedur penyaluran Kredit *Channeling P2P Lending*.
- c. Bermitra dengan *partner P2P lending* yang dapat memberikan nilai tambah kepada perusahaan melalui bisnis turunan dengan menggandeng mitra yang memiliki ekosistem bisnis
- d. Dalam rangka pemberian kredit yang sehat, membatasi kerjasama dengan *partner P2P lending* yang memiliki TKB > 95 atau dibawah TKB tersebut dengan adanya pertimbangan khusus.
- e. Membatasi tingkat kredit bermasalah untuk mitra maksimal 5%.
- f. Menyusun dan mengembangkan *digital platform* dalam proses penyaluran kredit dengan skema *channeling* agar terciptanya efisiensi *business flow*, kecepatan dan akurasi pemberian kredit.
- g. Menjalin kolaborasi strategis dengan *Venture Capital* seperti BRI Venture (bagian dari BRI Group) untuk melakukan analisa dan kajian *potential P2P Lending* dari sudut pandang *Venture Capital*.

4. Strategi Ecosystem Partnership

Dalam rangka mendukung strategi perusahaan menjadi *Digital Banking for Agribusiness and Beyond*, maka strategi *ecosystem*

- b. Opening access to market share for existing BRI and Bank Raya customers.
- c. Change of business model from B2C to B2B2C through the development of Pinang API and Webview so that it can integrate with third parties.
- d. Paylater development to serve loan needs <30 days.
- e. Initiating collaboration with third parties for e-commerce, agents, fintech and others to increase consumer loan expansion.
- f. Do a breakdown of consumer Pinang targets to work units to support the increase in outstanding and cooperative companies.
- g. Development of Credit Scoring so that the target market for Pinang can be expanded to existing customers (2021) and mass market (2022).
- h. Development of a more advanced auto-debit system to maintain loan collectibility and mitigate quality deterioration.

3. Channeling Strategy

To support innovative credit growth and as a new business model proportion, in lending to the channeling sector, it will focus on financing the productive sector in Agri and non-agriculture as well as the consumptive sector through P2P Lending partners with a strategic focus:

- a. Re-Focussing P2P channeling financing in the Retail Commercial and Consumer segments while still paying attention to P2P Lending Channeling Governance.
- b. Develop Policies and Procedures for channeling P2P Lending Credit.
- c. Partnering with P2P lending partners who can provide added value to companies through derivative businesses by cooperating with partners who have a business ecosystem
- d. In the context of providing healthy credit, limiting cooperation with P2P lending partners who have a TKB > 95 or below the TKB with special considerations.
- e. Limiting the non-performing loan rate for partners to a maximum of 5%.
- f. Develop and develop a digital platform in the credit distribution process with a channeling scheme in order to create business flow efficiency, speed and accuracy of lending.
- g. Establish strategic collaborations with Venture Capital such as BRI Venture (part of the BRI Group) to conduct analysis and study of potential P2P Lending from the perspective of Venture Capital.

4. Ecosystem Partnership Strategy

In order to support the company's strategy to become Digital Banking for Agribusiness and Beyond, the ecosystem partnership

partnership menjadi sangat vital dalam membangun *ecosystem closed loop business* diantaranya dengan :

- a. Menggandeng *strategic partner* baik *fintech*, *startup* maupun *ecosystem players* lainnya untuk menjalankan bisnis berbasis ekosistem.
- b. Menjadi *Bank as a Services* dengan menggunakan layanan Open API untuk menjadi *House of Fintech & Home for Gig Economy*.
- c. Membangun kapabilitas bisnis dengan skema *business to business to customer* (B2B2C).
- d. Memaksimalkan kolaborasi dengan BRI sebagai Induk untuk mengembangkan ekosistem bisnis yang telah ada dan menggali bisnis turunan untuk ekosistem Bank BRI.

5. Strategi Pinang Maksima

Sesuai dengan arah kebijakan manajemen dan strategi perusahaan terkait transformasi Bank Raya, maka strategi bisnis segmen Retail akan mengalami perubahan dengan menerapkan konsep bisnis berbasis ekosistem, khususnya adalah ekosistem bisnis di sektor *agri & beyond* dengan menjadi *aggregator* yang akan menghubungkan seluruh *supply chain* bisnis di sektor tersebut mulai dari *merchant* sampai dengan *supplier*. Selain itu, Jangka waktu pembiayaan juga akan disesuaikan menjadi pembiayaan jangka pendek agar sesuai dengan profil simpanan di Bank Raya yang didominasi oleh simpanan jangka pendek, sehingga tidak terjadi *maturity gap* yang tinggi.

Adapun transformasi bisnis segmen Retail akan dilakukan dalam jangka waktu 3 Tahun yaitu mulai dari Tahun 2021 sampai dengan 2023 dengan strategi transformasi berikut:

- a. Debitur segmen *Retail non Agri* akan dialihkan kepada pihak ketiga melalui skema *sell up*, *take over* dan skema lainnya sesuai kesepakatan kedua belah pihak.
- b. Kredit Sektor Agribisnis > Rp 1 Miliar akan dialihkan kepada pihak ketiga melalui skema *sell up*, *take over* dan skema lainnya sesuai kesepakatan kedua belah pihak.
- c. Kredit Sektor Agribisnis s.d Rp 1 Miliar tidak termasuk kredit program baik KUR maupun Non KUR yang saat ini berada di luar wilayah yang memiliki potensi untuk pembukaan *Community Branch* akan dialihkan kepada pihak ketiga.
- d. Kredit Sektor Agribisnis s.d Rp 1 Miliar termasuk kredit program baik KUR maupun Non KUR yang saat ini berada di wilayah yang memiliki potensi untuk pembukaan *Community Branch* akan dipertahankan.
- e. Kredit yang akan dialihkan ke BRI atau pihak ketiga adalah debitur dengan Kolektibilitas Lancar.
- f. Kredit Plasma akan dipertahankan dan pengelolaannya akan dialihkan ke *Head Office*.

strategy is very vital in building a closed loop business ecosystem, including by:

- a. Collaborating with strategic partners, both fintech, startups and other ecosystem players to run an ecosystem-based business.
- b. Becoming a Bank as a Services by using Open API services to become a House of Fintech & Home for Gig Economy.
- c. Building business capabilities with a business to business to customer (B2B2C) scheme.
- d. Maximising collaboration with BRI as the parent to develop the existing business ecosystem and explore derivative businesses for the BRI Bank ecosystem.

5. Pinang Maksima Strategy

In accordance with the direction of management policies and company strategies related to the transformation of Bank Raya, the Retail segment's business strategy will undergo changes by implementing an ecosystem-based business concept, particularly the business ecosystem in the *agri & beyond* sector by becoming an aggregator that will connect all business supply chains in the sector. from merchants to suppliers. In addition, the financing period will also be adjusted to short-term financing to match the profile of deposits at Bank Raya which is dominated by short-term deposits, so that there is no high maturity gap.

The Retail segment business transformation will be carried out within a period of 3 years, starting from 2021 to 2023 with the following transformation strategy:

- a. Non-Agri Retail segment debtors will be transferred to third parties through sell-up, take-over and other schemes according to the agreement of both parties.
- b. Agribusiness Sector Loans > IDR 1 billion will be transferred to third parties through sell-up, take-over and other schemes according to the agreement of both parties.
- c. Agribusiness Sector Loans of up to IDR 1 billion, excluding program loans, both KUR and Non KUR, which are currently outside areas that have the potential to open Community Branches will be transferred to third party.
- d. Agribusiness Sector Loans of up to IDR 1 billion, including program credits for both KUR and Non KUR currently located in areas with potential for opening Community Branches will be maintained.
- e. Loans that will be transferred to BRI or third parties are debtors with Current Collectibility.
- f. Plasma Credit will be maintained and its management will be transferred to the Head Office.

- g. Dilakukan penyesuaian terhadap target penyaluran KUR pada tahun 2021 menjadi dibawah Kuota yang ditetapkan oleh Kementerian Koordinator Bidang Perekonomian dikarenakan jumlah Unit Kerja yang dapat melakukan ekspansi berkurang sebagai konsekuensi dari transformasi bisnis Bank Raya.
 - h. Melakukan pengembangan dan pemasaran produk Pinang Retail yaitu produk kredit Retail yang ditujukan untuk melayani ekosistem bisnis di sektor *agri & beyond* beserta seluruh *supply chain* bisnisnya dengan *ticket size* antara Rp100 juta s.d Rp1 Miliar.
 - i. Mengembangkan *Order Management System* yang akan digunakan oleh tenaga pemasar/AO untuk melayani kebutuhan transaksi *supplier* dan *merchant* di ekosistem bisnis sektor *agri & beyond*.
- g. An adjustment was made to the KUR distribution target in 2021 to be below the quota set by the Coordinating Ministry for Economic Affairs because the number of Work Units that could expand was reduced as a consequence of Bank Raya's business transformation.
 - h. Developing and marketing Pinang Retail products, namely Retail credit products aimed at serving the business ecosystem in the agri & beyond sector and its entire business supply chain with ticket sizes between IDR 100 million to IDR 1 billion.
 - i. Develop an Order Management System that will be used by marketers/AO to serve the transaction needs of suppliers and merchants in the agri & beyond business ecosystem.

Pangsa Pasar

Pada akhir tahun 2021 jumlah modal inti Bank Raya tercatat sebesar Rp2.078 miliar. Sesuai Peraturan OJK Nomor 12/POJK.03/2021 masuk dalam KBMI (Kelompok Bank berdasarkan Modal Inti) I, yaitu bank dengan modal inti hingga Rp6 triliun.

Market share

At the end of 2021, Bank Raya's core capital was recorded at IDR 2,078 billion. According to FSA Regulation Number 12/POJK.03/2021 included in the KBMI (Bank Group based on Core Capital) I, namely banks with a core capital of up to IDR 6 trillion.

dalam miliar Rupiah/in billion rupiah

Uraian Description		2021
Jumlah Aset Total assets	KMBI 1 Bank Group by Core Capital I	1.348.864
	Bank Raya Raya Bank	16.867
	Pangsa Pasar Market share	1,24%
Dana Pihak Ketiga Third-party funds	KMBI 1 Bank Group by Core Capital I	970.137
	Bank Raya Raya Bank	13.496
	Pangsa Pasar Market share	1,39%
Kredit yang Diberikan Credits Granted	KMBI 1 Bank Group by Core Capital I	693.732
	Bank Raya Raya Bank	11.608
	Pangsa Pasar Market share	1,67%

Dana dan Jasa Funds and Services

Bank Raya menghimpun dana masyarakat, baik institusi maupun ritel melalui produk-produk simpanan, yaitu giro, tabungan dan deposito. Bank terus berupaya untuk meningkatkan jumlah simpanan nasabah dengan menawarkan berbagai jenis produk yang sesuai dengan kebutuhan nasabah. Selain menawarkan kemudahan, Bank juga menawarkan keuntungan yang kompetitif dan menarik dari setiap produk simpanan.

Produk Dana dan Jasa

Bank Raya memiliki beragam produk simpanan yang memiliki fitur dan keunggulan yang berbeda sesuai kebutuhan nasabah, antara lain:

1. Giro
2. Tabungan
 - Tabungan Raya
 - Tabungan Raya Berhadiah
 - Tabungan Raya Infiniti
 - Tabungan Raya Multima
 - Dan lain-lain
3. Deposito

Produk-produk tersebut juga dilengkapi dengan berbagai fitur yaitu:

- Kartu ATM
- *Mobile banking*
- *Internet banking*
- *Cash Management System*
- *Virtual Account*

Tantangan yang Dihadapi

1. Adanya Transformasi dari Produk Konvensional menjadi Digital.
2. Persaingan Produk dan Rate antar Bank.
3. Dampak Pandemi sehingga tidak bisa bertemu langsung dengan Nasabah.

Strategi Dana dan Jasa Tahun 2021

Selama proses transformasi, diproyeksikan Dana Pihak Ketiga terus menurun karena adanya proses *revamp* di Unit Kerja dan *revamp* kredit terutama kredit dengan jaminan simpanan. Namun Bank tetap akan menjaga agar sumber pendanaan khususnya komposisi Dana Pihak Ketiga (DPK) tetap seoptimal mungkin bersumber dari *Low Cost Funding* yaitu CASA. Untuk mencapai tujuan tersebut, strategi yang akan dilaksanakan oleh Bank adalah sebagai berikut:

1. Melaksanakan program akuisisi simpanan yang fokus pada akselerasi pertumbuhan CASA.
2. Menetapkan *threshold rate* Deposito yaitu maksimum 6,5%.

Bank Raya raised third parties funds, both institutional and retail through savings products, namely demand deposits, savings and time deposits. The Bank continues to strive to increase the number of customer deposits by offering various types of products according to customer needs. In addition to offering convenience, the Bank also offers competitive and attractive benefits from each deposit product.

Fund Products and Services

Bank Raya has a variety of deposit products that have different features and advantages according to customer needs, including:

1. Current Account
2. Savings
 - Raya Savings
 - Raya Berhadiah Savings
 - Raya Infiniti Savings
 - Multima Savings
 - And others
3. Deposit

These products are also equipped with various features, namely:

- ATM card
- Mobile banking
- Internet banking
- Cash Management System
- Virtual Account

Challenges Faced

1. There is a Transformation from Conventional to Digital Products.
2. Product and Rate Competition between Banks.
3. The impact of the pandemic that leads to unable contact directly with customers.

Funds and Services Strategy 2021

During the transformation process, it is projected that Third Party Funds will continue to decline due to the *revamp* process in the Work Units and credit *revamps*, especially loans with deposit guarantees. However, the Bank will keep the source of funding, especially the composition of Third Party Funds (DPK) as optimal as possible, sourced from Low Cost Funding, namely CASA. To achieve these objectives, the strategies that will be implemented by the Bank are as follows:

1. Implement a savings acquisition program that focuses on accelerating CASA growth.
2. Set the deposit threshold rate, which is a maximum of 6.5%.

3. Melakukan *bundling* pemasaran produk simpanan dan pinjaman melalui *digital saving*.
4. Mengembangkan teknologi, untuk dapat memberikan pelayanan yang lebih baik kepada nasabah *existing* dan nasabah baru.
5. Sinergi dengan BRI dan perusahaan anak BRI.
6. Promosi Bank Raya dan produk Bank Raya.

3. Conduct marketing bundling of savings and loan products through digital saving.
4. Develop technology, to be able to provide better services to existing customers and new customers.
5. Synergy with BRI and BRI subsidiary companies.
6. Promotion of Bank Raya and Bank Raya products.

Kinerja Dana dan Jasa Tahun 2021

Funds and Services Performance in 2021

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/ Penurunan Increase/Decrease	
			Rp	%
Giro Current Account	2.050.928	3.752.094	(1.701.166)	(45,34%)
Tabungan Savings	3.022.639	1.733.308	1.289.330	74,39%
Deposito Deposit	8.422.726	17.509.876	(9.087.151)	(51,90%)
Total Total	13.496.292	22.995.279	(9.498.987)	(41,31%)
CASA (%) CASA (%)	37,59%	23,85%	13,74%	57,59%

Sepanjang tahun 2021, Bank Raya berhasil menghimpun dana pihak ketiga (DPK) sebesar Rp13,496 miliar. Jumlah tersebut mengalami penurunan dibandingkan tahun sebelumnya sebesar Rp22.995 miliar. Penurunan tersebut disebabkan RBB 2021 menurun jika dibandingkan dengan RBB 2020 dan penurunan tersebut juga disesuaikan dengan kebutuhan perusahaan terkait transformasi khususnya *revamping* KYD dan DPK (situasional).

Throughout 2021, Bank Raya managed to collect third party funds (DPK) of IDR 13,496 billion. This amount decreased compared to the previous year of IDR 22,995 billion. The decrease was due to the decline in the 2021 RBB when compared to the 2020 RBB and the decline was also adjusted to the company's needs related to transformation, especially KYD and DPK (situational) revamping.

Produk deposito masih menjadi kontributor terbesar bagi DPK Bank Raya, yaitu sebesar Rp8,423 miliar atau setara dengan 62,41% dari total DPK tahun 2021.

Deposit products are still the largest contributor to Bank Raya deposits, amounting to IDR 8.423 billion or equivalent to 62.41 % of the total TPF in 2021.

Giro

Current Account

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pihak Ketiga Third party				
Rupiah Rupiah	1.921.609	2.286.913	(365.306)	(15,97%)
Dolar Amerika Serikat United States Dollar	33.290	450.917	(417.627)	(92,62%)

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pihak Berelasi Related Parties				
Rupiah Rupiah	94.263	834.348	(740.085)	(88,70%)
Dolar Amerika Serikat United States Dollar	1.766	179.916	(178.150)	(99,02%)
Total Total	2.050.928	3.752.094	(1.701.166)	(45,34%)

Tahun 2021, kinerja produk Giro mengalami penurunan dibandingkan tahun sebelumnya, yaitu dari Rp3.752 miliar di tahun 2020 menjadi Rp2.051 miliar di tahun 2021. Penurunan tersebut disebabkan kinerja giro juga disesuaikan dengan kebutuhan DPK yang menurun dari 2020 ke 2021, sehingga CASA per 2021 mencapai sebesar 37,59%.

In 2021, the performance of Current Accounts decreased compared to the previous year, from IDR 3,752 billion in 2020 to IDR 2,051 billion in 2021. The Decrease was due to current account performance which was also adjusted to the need for TPF which decreased from 2020 to 2021, so that CASA per 2021 can reach 37.59%.

Tabungan

Savings

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pihak Ketiga				
Third party				
Tabungan Raya Infiniti Raya Infiniti Savings	2.203.221	454.748	1.748.473	384,49%
Tabungan Raya Raya Savings	305.390	312.678	(7.288)	(2,33%)
Tabungan Raya Berhadiah Raya Berhadiah Savings	248.995	206.561	42.434	20,54%
Tabungan Raya Multima Raya multima Savings	14.571	14.021	550	3,93%
Tabunganku Tabunganku	5.844	8.094	(2.250)	(27,80%)
Pihak Berelasi				
Related Parties				
Tabungan Raya Infiniti Raya Infiniti Savings	152.074	489.878	(337.804)	(68,96%)
Tabungan Raya Raya Savings	65.670	241.881	(176.211)	(72,85%)
Tabungan Raya Berhadiah Raya Berhadiah Savings	26.575	5.415	21.160	390,77%
Tabungan Raya Multima Raya multima Savings	289	32	258	810,42%
Tabunganku Tabunganku	*	*		
Total Total	3.022.639	1.733.308	1.289.330	74,39%

*di bawah Rp1 miliar/under IDR 1 billion

Produk tabungan mencatat kinerja yang sangat baik di tahun 2021. Pada akhir tahun 2021, jumlah DPK dari produk tabungan tercatat sebesar Rp3.023 miliar, meningkat 74,39% dari tahun sebelumnya sebesar Rp1.733 miliar. Peningkatan tersebut disebabkan adanya beberapa program aktivasi dana ritel.

Savings products recorded an excellent performance in 2021. At the end of 2021, the number of deposits from savings products was recorded at IDR 3,023 billion, an increase of 74.39 % from the previous year of IDR 1,733 billion. The increase was due to several retail fund activation programs.

Deposito

Deposit

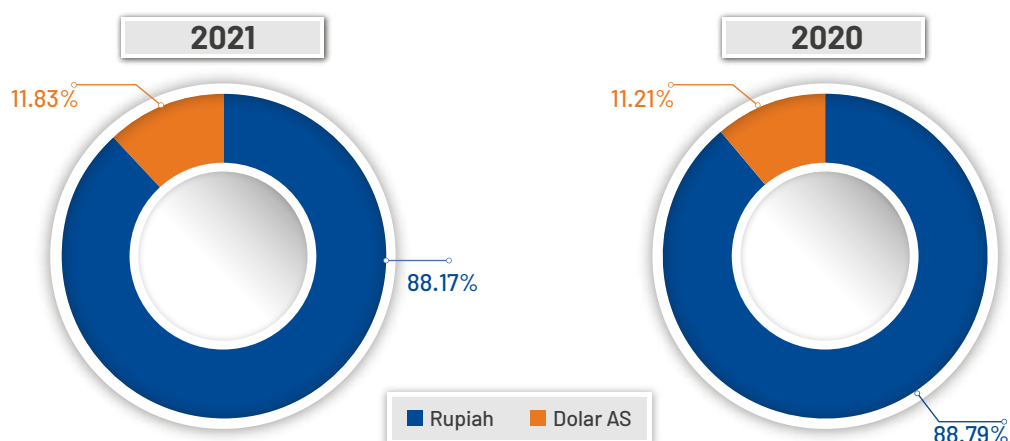
dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pihak Ketiga Third party				
Rupiah Rupiah	6.693.144	12.461.424	(5.768.280)	-46,29%
Dolar Amerika Serikat United States Dollar	993.046	557.052	435.993	78,27%
Pihak Berelasi Related Parties				
Rupiah Rupiah	733.418	3.086.438	(2.353.021)	-76,24%
Dolar Amerika Serikat United States Dollar	3.119	1.404.962	(1.401.843)	-99,78%
Total Total	8.422.726	17.509.876	(9.087.151)	-51,90%

Kinerja produk deposito tahun 2021 mengalami penurunan dibandingkan tahun sebelumnya, yaitu dari Rp17.510 miliar di tahun 2020 menjadi Rp8.423 miliar di tahun 2021. Penurunan kinerja produk deposito tersebut disebabkan adanya penurunan *rate* dan penyesuaian risiko konsentrasi.

The performance of deposit products in 2021 decreased compared to the previous year, from IDR 17,510 billion in 2020 to IDR 8,423 billion in 2021. The decline in performance of deposit products was due to a decrease in the rate and adjustment of concentration risk.

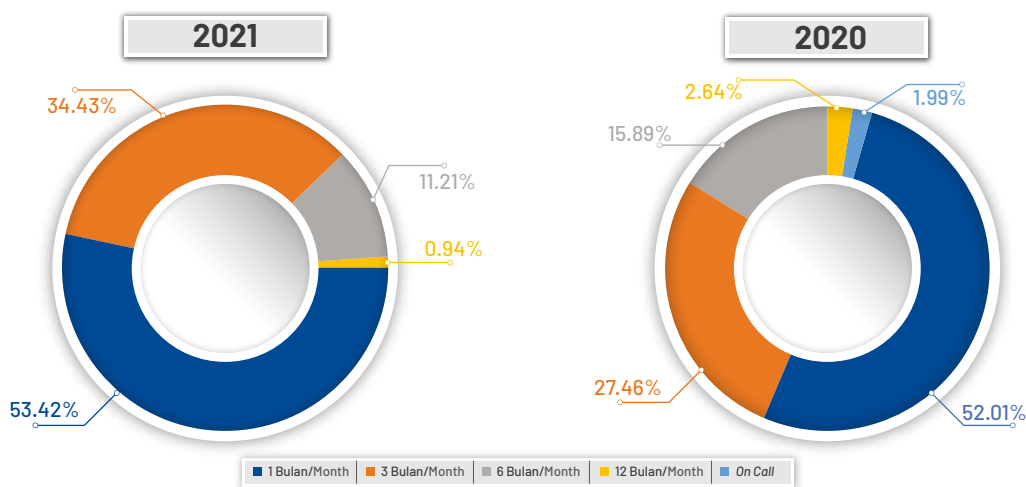
Deposito Berjangka berdasarkan Mata Uang Rupiah dan USD
Time Deposits based on Rupiah and USD



Deposito Bank Raya utamanya merupakan deposito dalam mata uang rupiah, yaitu mencapai Rp7.427 miliar atau setara dengan 88,17% dari total produk deposito. Sedangkan berdasarkan periode, deposito Bank Raya utamanya adalah deposito dengan jangka waktu 1 bulan, yaitu mencapai Rp4.500 miliar atau setara dengan 53,42% dari total produk deposito.

Bank Raya's deposits are mainly time deposits denominated in rupiah, which reached IDR 7.427 billion or equivalent to 88.17% of the total deposit products. Meanwhile, based on the period, Bank Raya deposits are mainly deposits with a period of 1 month, which is up to IDR 4,500 billion or equivalent to 53.42 % of the total deposit products.

Deposito berjangka berdasarkan Periode Kontrak
Time deposits based on Contract Period



Pengembangan Produk Simpanan Tahun 2022

Pada Tahun 2022, pengembangan produk simpanan akan diarahkan kepada produk *digital saving* yang dikonversi dari produk-produk layanan *Digital Banking*. Layanan *Digital Banking* meliputi *mobile banking*, internet banking, cash management system dan *virtual account*. Kinerja *Digital Banking* selama tahun 2021 mengalami peningkatan, hanya untuk kartu ATM yang mengalami penurunan. Hal ini dikarenakan nasabah sudah dimudahkan melalui layanan *Digital Banking*.

Savings Product Development in 2022

In 2022, the development of savings products will be directed to digital saving products that are converted from Digital Banking service products. Digital Banking services include mobile banking, internet banking, cash management systems and virtual accounts. The performance of Digital Banking during 2021 has increased, only for ATM cards which have decreased. This is because customers have been facilitated through Digital Banking services.

Jumlah Pengguna/Number of Users

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Pengguna User	%
Kartu ATM ATM card	67.907	81.064	(13.157)	-16,23%
Mobile Banking Mobile Banking	49.302	43.142	6.160	14,28%
Internet Banking Internet banking	49.774	40.514	9.260	22,86%
Cash Management System Cash Management System	845	633	212	33,49%
Virtual Account Virtual Account	22	18	4	22,22%

Bisnis Legacy & Digital Legacy & Digital Business

Bank Raya menyalurkan pinjaman kepada nasabah, baik nasabah individu maupun korporasi sebagai pelaksanaan dari fungsi intermediasi perbankan. Bank Raya menawarkan produk-produk pinjaman yang sesuai dengan kebutuhan dan karakteristik nasabah. Produk-produk pinjaman yang ditawarkan Bank Raya juga memiliki berbagai keunggulan untuk memikat debitur selain dengan menawarkan tingkat suku bunga yang kompetitif.

Sebelum transformasi, penyaluran kredit Bank Raya membidik segmen konsumen, ritel dan menengah. Setelah merubah kebijakan perusahaan sebagai Bank Digital, saat ini Bank hanya melakukan ekspansi terhadap kredit berbasis digital dan mempertahankan kualitas aset dan optimalisasi *recovery* bisnis *legacy* (Kredit Menengah, Kredit Ritel, Kredit Konsumer).

Kinerja Penyaluran Pinjaman

Bank Raya disburses loans to customers, both individual and corporate customers as the implementation of the banking intermediation function. Bank Raya offers loan products that suit the needs and characteristics of customers. The loan products offered by Bank Raya also have various advantages to attract debtors in addition to offering competitive interest rates.

Prior to the transformation, Bank Raya's lending was targeted at the consumer, retail and medium-sized segments. After changing the company's policy as a Digital Bank, currently the Bank is only expanding to digital-based credit and maintaining asset quality and optimizing legacy business recovery (Medium Loans, Retail Loans, Consumer Loans).

Loan Distribution Performance

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pihak Ketiga Third party				
Rupiah Rupiah				
Modal Kerja Working capital	2.988.087	5.620.108	(2.632.021)	(46.83%)
Investasi Investation	2.790.896	5.541.055	(2.750.159)	(49.63%)
Program Program	1.774.327	2.626.438	(852.111)	(32.44%)
Konsumsi Consumption	954.565	1.154.997	(200.432)	(17.35%)
Sindikasi Syndicate	177.474	485.119	(307.645)	(63.42%)
Dolar Amerika Serikat United States Dollar				
Modal Kerja Working capital	206.850	686.640	(479.790)	(69.88%)
Investasi Investation	499.981	568.050	(68.069)	(11.98%)
Sindikasi Syndicate	507.549	331.007	176.542	53,33%

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pihak Berelasi Related Parties				
Rupiah Rupiah				
Modal Kerja Working capital	612.653	562.191	50.462	8,98%
Investasi Investation	447.770	466.131	(18.361)	(3,94%)
Konsumsi Consumption	3.138	3.317	(179)	(5,41%)
Sindikasi Syndicate	645.038	1.446.880	(801.842)	(55,42%)
Total Total	11.608.327	19.491.934	(7.883.607)	(40,45%)
Cadangan kerugian penurunan nilai Allowance for impairment losses	(1.875.402)	(1.006.365)	(869.037)	86,35%
Neto net	9.732.925	18.485.569	(8.752.644)	(47,35%)

Jumlah kredit yang diberikan Bank Raya tahun 2021 mencapai Rp11.608 miliar, mengalami penurunan dibandingkan tahun sebelumnya Rp19.492 miliar. Penurunan penyaluran kredit tersebut disebabkan oleh Bank akan melakukan transformasi, sehingga tidak melakukan ekspansi untuk produk eksisting dan fokus untuk pengembangan produk digital.

The number of loans granted by Bank Raya in 2021 reached IDR 11,608 billion, a decrease compared to the previous year of IDR 19,492 billion. The decrease in credit disbursement was due to Bank Raya is transformed, therefore lending expansion for existing products is discontinued and focus on digital product development.

Penyaluran kredit berdasarkan sektor ekonomi

Credit distribution by economic sector

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pertanian Agriculture	5.390.433	9.091.012	(3.700.579)	(40,71%)
Perindustrian Industry	1.107.280	2.824.850	(1.717.570)	(60,80%)
Konstruksi Construction	1.319.421	2.164.449	(845.028)	(39,04%)
Perdagangan, Perhotelan dan Restoran Trade, Hospitality and Restaurant	1.402.682	2.431.975	(1.029.293)	(42,32%)
Listrik, Gas dan Air Electricity, Gas and Water	726.264	716.632	9.632	1,34%
Jasa Dunia Usaha Business Services	319.903	631.139	(311.236)	(49,31%)

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pengangkutan, Pergudangan dan Komunikasi Transportation, Warehousing and Communication	246.292	313.467	(67.175)	(21.43%)
Jasa Pelayanan Sosial Social Services	126.167	145.230	(19.063)	(13.13%)
Pertambangan Mining	11.747	14.846	(3.099)	(20.87%)
Lain-lain Etc	958.138	1.158.314	(200.176)	(17.28%)
Jumlah Amount	11.608.327	19.491.934	(7.883.607)	(40.45%)
Cadangan kerugian penurunan nilai Allowance for impairment losses	(1.875.402)	(1.006.365)	(869.037)	86.35%
Neto net	9.732.925	18.485.569	(8.752.644)	(47.35%)

Suku Bunga Dasar Kredit

Bank Raya mempublikasikan Suku Bunga Dasar Kredit (SBDK) dalam mata uang Rupiah sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan (OJK) Nomor 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank. Ketentuan peraturan perundang-undangan mengenai transparansi informasi produk bank dan penggunaan data pribadi nasabah kemudian diatur secara lebih rinci pada Surat Edaran OJK Nomor 9/SEOJK.03/2020 tentang Transparansi dan Publikasi Laporan Bank Umum Konvensional. Informasi SBDK yang berlaku dapat dilihat pada publikasi di setiap kantor Bank dan/atau website Bank www.bankraya.co.id.

Bank menggunakan SBDK sebagai dasar penetapan suku bunga kredit yang akan dikenakan kepada nasabah. Akan tetapi, SBDK belum memperhitungkan komponen estimasi premi risiko yang besarnya tergantung dari penilaian Bank terhadap risiko masing-masing debitur atau kelompok debitur. Dengan demikian, besaran suku bunga kredit yang dikenakan kepada debitur belum tentu sama dengan SBDK. Bank senantiasa meninjau ulang dan memperbarui SBDK sesuai dengan pergerakan suku bunga acuan *BI 7-day (Reverse) Repo Rate*. SBDK di Bank Raya dikelompokkan berdasarkan segmentasi kredit menjadi empat kelompok, yaitu kredit korporasi, kredit ritel, kredit mikro, dan kredit konsumsi.

Basic Loan Interest Rate

Bank Raya publishes Basic Loan Interest Rates (SBDK) in Rupiah as regulated in Financial Services Authority (OJK) Regulation Number 37/POJK.03/2019 concerning Transparency and Publication of Bank Reports. The provisions of laws and regulations regarding transparency of bank product information and the use of customer personal data are then regulated in more detail in OJK Circular Letter Number 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports. Information on the applicable SBDK can be seen in publications at each Bank office and/or the Bank's website www.bankraya.co.id.

Banks use the SBDK as the basis for determining the loan interest rate that will be charged to customers. However, the SBDK has not taken into account the components of the estimated risk premium, the amount of which depends on the Bank's assessment of the risk of each debtor or group of debtors. Thus, the loan interest rate charged to debtors is not necessarily the same as the SBDK. The Bank constantly reviews and updates the prime lending rate in accordance with the movement of the *BI 7-day (Reverse) Repo Rate*. The prime lending rates at Bank Raya are grouped based on credit segmentation into four groups, namely corporate loans, retail loans, micro loans, and consumer loans.

Periode Period	Kredit Korporasi Corporate Credit	Kredit Ritel Retail Credit	Kredit Mikro Micro Credit	Kredit Konsumsi Consumer Credit	
				KPR Mortgage	Non KPR Non-KPR
Desember 2020 December 2020	9,90%	11,36%	-	9,68%	14,62%
Maret 2021 March 2021	8,10%	9,56%	-	7,88%	12,82%
Juni 2021 June 2021	7,86%	9,32%	-	7,64%	12,58%
September 2021 September 2021	9,50%	11,50%	-	12,75%	14,00%
Desember 2021 December 2021	9,50%	11,50%	-	12,75%	14,00%

Tinjauan Operasi Per Segmen Usaha

Overview of Operations Per Business Segment

Bank menerapkan PSAK No. 5 (Revisi 2009), "Segmen Operasi". PSAK revisi ini mengatur pengungkapan yang memungkinkan pengguna laporan keuangan untuk mengevaluasi sifat dan dampak keuangan dari aktivitas bisnis dimana entitas terlibat dan lingkungan ekonomi dimana entitas beroperasi.

Laporan Keuangan Bank yang telah diaudit oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja (a member firm of Ernst & Young Global Limited) telah membagi Segmen Operasi Bank dalam 4 (empat) kelompok utama, yaitu Konsumer, Ritel, Menengah dan Lainnya. Selain itu, Bank juga telah membagi segmen berdasarkan geografis, yaitu Jabodetabek, Jawa, Sumatera, Kalimantan dan Sulawesi.

Pembahasan Tinjauan Operasi per Segmen Usaha pada laporan ini disesuaikan dengan Segmen Operasi pada Laporan Keuangan.

The Bank applies PSAK No. 5 (Revised 2009), "Operations Segment". This revised PSAK provides disclosures that enable users of financial statements to evaluate the nature and financial effects of the business activities in which the entity engages and the economic environment in which the entity operates.

The Bank's Financial Statements which have been audited by the Public Accounting Firm of Purwantono, Sungkoro & Surja (a member firm of Ernst & Young Global Limited) have divided the Bank's Operational Segments into 4 (four) main groups, namely Consumer, Retail, Medium and Others. In addition, the Bank has also divided segments based on geography, namely Jabodetabek, Java, Sumatra, Kalimantan and Sulawesi.

The discussion of Operational Review per Business Segment in this report is adjusted to the Operational Segment in the Financial Statements.

Bisnis Legacy

Legacy Business

Bisnis *Legacy* dalam proses transformasi melaksanakan strategi *Revamp*, yaitu penataan kembali bisnis yang telah ada yang difokuskan pada *shifting* portofolio, menjaga kualitas aset dan optimalisasi *recovery* sebagai pendapatan Bank.

The Legacy business is in the process of transforming to implement the Revamp strategy, which is a realignment of the existing business that is focused on shifting portfolios, maintaining asset quality and optimizing recovery as the Bank's income.

Segmen Kredit Menengah Legacy

Legacy Medium Credit Segment

Segmen menengah sudah tidak melakukan ekspansi, dan kredit-kredit yang masih memiliki *outstanding* akan dialihkan melalui pihak ketiga.

The middle segment is no longer expanding, and loans that still have outstanding will be transferred through third parties.

Strategi yang Diterapkan

Sesuai dengan arah kebijakan manajemen dan strategi perusahaan yang akan melakukan transformasi bisnis *Digital Agri & Beyond* maka Bisnis Menengah akan melaksanakan proses *revamp* atau pengalihan portofolio pinjaman kepada pihak ketiga dalam jangka waktu 5 Tahun yaitu mulai dari Tahun 2021 sampai dengan 2025.

Dalam masa transisi tersebut Bank Raya tetap memberikan pelayanan optimal kepada debitur segmen Menengah *existing* sesuai dengan perjanjian kredit sehingga tetap dalam kondisi perform ketika beralih kepada pihak ketiga.

Implemented Strategy

In accordance with the direction of management policies and company strategies that will transform the Digital Agri & Beyond business, the Medium Business will carry out a revamp process or transfer of loan portfolios to third parties within a period of 5 years, starting from 2021 to 2025.

During this transition period, Bank Raya continues to provide optimal services to existing Medium segment debtors in accordance with credit agreements so that they remain in a performing condition when switching to third parties.

Tantangan yang Dihadapi

Selama tahun 2021 merupakan tantangan tersendiri bagi segmen Menengah. Sesuai arah kebijakan transformasi Bank Raya, segmen Menengah hanya dapat mengelola debitur eksisting dan tidak dapat melakukan ekspansi kredit. Di sisi lain, kondisi pandemi Covid-19 yang masih terus berlanjut dan diberlakukan kembali PPKM di Triwulan 3 2021 berdampak signifikan terhadap kondisi usaha dan kondisi debitur segmen Menengah. Hal tersebut menimbulkan dampak semakin bertambahnya debitur eksisting yang mengalami penurunan performa usaha yang pada akhirnya mengalami penurunan kualitas kredit.

Kinerja Segmen Menengah

Challenges Faced

During 2021, it will be a challenge for the Middle segment. In accordance with the direction of Bank Raya's transformation policy, the Medium segment can only manage existing debtors and cannot expand credit. On the other hand, the ongoing Covid-19 pandemic and the re-enactment of PPKM in Quarter 3 2021 had a significant impact on business conditions and the condition of Middle segment debtors. This has the effect of increasing existing debtors who have decreased business performance which in turn has decreased credit quality.

Medium Segment Performance

dalam jutaan Rupiah/in million rupiah

Nama Produk Product name	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Menengah Agribisnis-PRK Agribusiness Intermediate-PRK	493.343	697.887	(204.544)	(29.31%)
Menengah Agribisnis-PTA Agribusiness Medium-PTA	3.545.861	6.462.255	(2.916.394)	(45.13%)
Menengah Agribisnis-PTR Medium Agribusiness-PTR	644.890	649.139	(4.249)	(0.65%)
Menengah Umum-PRK General Medium-PRK	201.203	2.055.533	(1.854.331)	(90.21%)
Menengah Umum-PTA General Medium-PTA	2.108.323	3.578.241	(1.469.919)	(41.08%)
Menengah Umum-PTR General Medium-PTR	63.681	62.263	1.418	2.28%
Total Total	7.057.300	13.505.318	(6.448.018)	(47.74%)

Kualitas Kredit Menengah

Medium Loan Quality

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020
Total Kredit Bermasalah Total Non-performing Loans	420.491	613.869
Total Kredit yang Diberikan (Gross) Total Loans (Gross)	7.057.300	13.505.318
Rasio Kredit Bermasalah (NPL Gross) Non-performing Loans Ratio (NPL Gross)	5,96%	4,55%

Profitabilitas Segmen Menengah

Medium Segment Profitability

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pendapatan Bunga Interest income	805.365	1.058.793	(253.428)	(18,98%)
Beban Bunga Interest expense	(467.276)	(968.287)	501.011	(51,74%)
Pendapatan Bunga - Neto Interest Income - Net	338.089	90.506	247.583	273,55%
Pendapatan Operasi Lainnya Other Operating Income	40.997	6.746	34.251	507,73%
Beban Operasi Lainnya Other Operating Expenses	(130.297)	(141.105)	10.808	(7,66%)
Penyisihan Kerugian Penurunan Nilai Allowance for Impairment Losses	(3.783.631)	(340.101)	(3.443.530)	1.012,50%
Pendapatan Non Operasional - Neto Non Operating Income - Net	(172)	3.639	(3.811)	(104,73%)
Laba Sebelum Beban Pajak Penghasilan Profit Before Income Tax Expense	(3.535.014)	(380.315)	(3.154.699)	829,50%
Beban Pajak Penghasilan - Neto Income Tax Expense - Net	275.502	194.759	80.743	41,46%
Laba Tahun Berjalan Current year profit	(3.259.512)	(185.556)	(3.073.956)	1.656,62%
Aset Segmen Segment Assets	5.699.133	13.004.806	(7.305.673)	(56,18%)
Liabilitas Segmen Segment Liability	8.525.379	17.553.318	(9.027.938)	(51,43%)

Segmen Kredit Ritel Legacy Retail Credit Segment Legacy

Segmen ritel sudah tidak melakukan ekspansi dan kredit-kredit yang masih memiliki *outstanding* akan dialihkan melalui pihak ketiga. Segmen Ritel akan difokuskan kepada pengembangan produk digital Pinang Maksima (*Agri Crawl Up*) dan Pinang Performa.

The retail segment is no longer expanding and loans that still have outstanding will be transferred through third parties. The Retail segment will focus on developing Pinang Maksima (*Agri Crawl Up*) and Pinang Performa digital products.

Strategi yang Diterapkan

Sesuai dengan arah kebijakan manajemen dan strategi perusahaan terkait transformasi Bank Raya, maka strategi bisnis segmen Retail akan mengalami perubahan dengan menerapkan konsep bisnis berbasis ekosistem, khususnya adalah ekosistem bisnis di sektor *agri & beyond* dengan menjadi *aggregator* yang akan menghubungkan seluruh *supply chain* bisnis di sektor tersebut mulai dari *merchant* sampai dengan *supplier*.

Implemented Strategy

In accordance with the direction of management policies and company strategies related to the transformation of Bank Raya, the Retail segment's business strategy will undergo changes by implementing an ecosystem-based business concept, particularly the business ecosystem in the *agri & beyond* sector by becoming an *aggregator* that will connect all business supply chains in the sector. from merchants to suppliers.

Selain itu, Jangka waktu pembiayaan juga akan disesuaikan menjadi pembiayaan jangka pendek agar sesuai dengan profil simpanan di Bank Raya yang didominasi oleh simpanan jangka pendek, sehingga tidak terjadi *maturity gap* yang tinggi.

Adapun transformasi bisnis segmen Retail akan dilakukan dalam jangka waktu 3 Tahun yaitu mulai dari Tahun 2021 sampai dengan 2023 dengan strategi transformasi berikut :

- a. Debitur segmen Retail non Agri dengan akan dialihkan kepada pihak ketiga melalui skema *sell up, take over* dan skema lainnya sesuai kesepakatan kedua belah pihak.
- b. Kredit Sektor Agribisnis > Rp1 Miliar akan dialihkan kepada pihak ketiga melalui skema *sell up, take over* dan skema lainnya sesuai kesepakatan kedua belah pihak.
- c. Kredit Sektor Agribisnis s.d Rp1 Miliar tidak termasuk kredit program baik KUR maupun Non KUR yang saat ini berada di luar wilayah yang memiliki potensi untuk pembukaan *Community Branch* akan dialihkan kepada pihak ketiga.
- d. Kredit Sektor Agribisnis s.d Rp1 Miliar termasuk kredit program baik KUR maupun Non KUR yang saat ini berada di wilayah yang memiliki potensi untuk pembukaan *Community Branch* akan dipertahankan.
- e. Kredit yang akan dialihkan ke pihak ketiga adalah debitur dengan Kolektibilitas Lancar.
- f. Kredit *legacy* Plasma akan dipertahankan dan pengelolaannya akan dialihkan ke *Head Office*.
- g. Melakukan penyesuaian terhadap target penyaluran KUR pada tahun 2021 menjadi dibawah Kuota yang ditetapkan oleh Kementerian Koordinator Bidang Perekonomian dikarenakan jumlah Unit Kerja yang dapat melakukan ekspansi berkurang sebagai konsekuensi dari transformasi bisnis Bank Raya.
- h. Melakukan pengembangan dan pemasaran program Pinang Maksima yaitu produk kredit Retail yang ditujukan untuk melayani ekosistem bisnis di sektor *agri & beyond* beserta seluruh *supply chain* bisnisnya dengan *ticket size* antara Rp100 juta s.d Rp1 Miliar.
- i. Mengembangkan *Order Management System* yang akan digunakan oleh tenaga pemasar/AO untuk melayani kebutuhan transaksi *supplier* dan *merchant* di ekosistem bisnis sektor *agri & beyond*.

Adanya tantangan dalam pengembangan serta ekspansi bisnis di tahun 2021, menjadi *concern* Bank Raya dalam pengembangan bisnisnya terutama untuk memberikan dampak yang lebih baik kepada masyarakat sehingga Bank Raya dapat berkontribusi dalam mendukung pemulihan ekonomi dan perkembangan keuangan yang *sustainable* serta kebutuhan untuk meningkatkan inklusi keuangan.

In addition, the financing period will also be adjusted to short-term financing to match the profile of deposits at Bank Raya which is dominated by short-term deposits, so that there is no high maturity gap.

The Retail segment business transformation will be carried out within a period of 3 years, starting from 2021 to 2023 with the following transformation strategy:

- a. Non-Agri Retail segment debtors will be transferred to third parties through sell-up, take-over and other schemes according to the agreement of both parties.
- b. Agribusiness Sector Loans > IDR1 billion will be transferred to third parties through sell-up, take-over and other schemes according to the agreement of both parties.
- c. Agribusiness Sector Loans of up to IDR1 billion excluding program credits, both KUR and Non KUR which are currently outside areas that have the potential to open Community Branches, will be transferred to third parties.
- d. Agribusiness Sector Loans of up to IDR1 billion, including program credits for both KUR and Non KUR currently located in areas with potential for opening Community Branches will be maintained.
- e. Credit that will be transferred to a third party is a debtor with Current Collectibility.
- f. legacy credits will be maintained and their management will be transferred to the Head Office.
- g. Adjusting the KUR distribution target in 2021 to be below the quota set by the Coordinating Ministry for Economic Affairs because the number of Work Units that can expand is reduced as a consequence of Bank Raya's business transformation.
- h. Developing and marketing the Pinang Retail program, namely Maksima credit products aimed at serving the business ecosystem in the agri & beyond sector and its entire business supply chain with ticket sizes between IDR 100 million to IDR 1 billion.
- i. Develop an Order Management System that will be used by marketers/AO to serve the transaction needs of suppliers and merchants in the agri & beyond business ecosystem.

The challenges in business development and expansion in 2021 are a concern for Bank Raya in developing its business, especially to provide a better impact on society so that Bank Raya can contribute to supporting economic recovery and sustainable financial development as well as the need to increase financial inclusion.

Hal ini dapat dibuktikan dengan adanya rencana pengembangan sistem Pinang Maksima yang akan mempercepat proses analisa dan penyaluran dana pinjaman secara digital. Strategi lain yang dilakukan Bank Raya adalah mengembangkan ekosistem *partnership* untuk mendukung tercapainya target RBB di tahun 2021.

Tantangan yang Dihadapi

Seiring dengan langkah transformasi Bank Raya terdapat beberapa tantangan yang dihadapi baik faktor internal maupun eksternal. Adapun faktor internal dimulai dari implementasi proses *revamp* unit kerja (penutupan dan relokasi unit kerja) termasuk portofolio bisnis (pinjaman dan simpanan), sumber daya manusia dan infrastruktur unit kerja hingga penetapan unit kerja yang dapat melakukan ekspansi bisnis.

Sedangkan, faktor eksternal yang paling mempengaruhi kinerja khususnya portofolio bisnis eksisting Bank Raya masih dipengaruhi oleh pandemi Covid-19 karena mengakibatkan ketidakpastian ekonomi global sehingga perbankan nasional khususnya Bank Raya ikut serta melakukan antisipasi dengan mengelola kualitas kredit melalui restrukturisasi fasilitas kredit. Namun demikian, Bank Raya tetap dapat menunjukkan kualitasnya sehingga mampu melampaui target dalam hal ekspansi bisnis kredit ritel melalui program Pinang Ritel dengan pencapaian sebesar > 120% dan menjaga kredit eksisting dengan baik selama tahun 2021.

Kinerja Segmen Kredit Ritel dan Program

This can be proven by the existence of a plan to develop a Maksima Pinang system that will accelerate the process of analyzing and distributing loan funds digitally. Another strategy carried out by Bank Raya is to develop a partnership ecosystem to support the achievement of the RBB target in 2021.

Challenges Faced

Along with Bank Raya's transformation steps, there were several challenges faced by both internal and external factors. The internal factors start from the implementation of the work unit revamp process (closure and relocation of work units) including the business portfolio (loans and savings), human resources and work unit infrastructure to the determination outlets that can expand the business.

Meanwhile, the external factors that most affect performance, especially Bank Raya's existing business portfolio, are still affected by the Covid-19 pandemic because it causes global economic uncertainty so that national banks, especially Bank Raya, participate in anticipating by managing credit quality through restructuring credit facilities. However, Bank Raya was still able to demonstrate its quality so that it was able to exceed the target in terms of retail credit business expansion through the Pinang Retail program with an achievement of > 120% and maintain existing loans well during 2021.

Retail and Program Loan Segment Performance

dalam jutaan Rupiah/in million rupiah

Nama Produk Product name	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Ritel Agribisnis Agribusiness Retail	306.751	351.971	(45.220)	(12,85%)
Ritel Umum General Retail	1.188.052	1.825.359	(637.306)	(34,91%)
Kredit Usaha Rakyat (KUR) People's Business Loan (KUR)	99.222	76.961	22.261	28,92%
Ritel Agribisnis Program Non Subsidi Agribusiness Retail Non-Subsidised Program	1.582.627	2.454.405	(871.778)	(35,52%)
Ritel Agribisnis Program Subsidi Agribusiness Retail Subsidy Program	54.202	56.114	(1.913)	(3,41%)
Ritel Program Kredit Pangan Retail Food Credit Program	3.977	3.957	19	0,49%
Total Total	3.234.830	4.768.767	(1.533.937)	(32,17%)

Kualitas Segmen Kredit Ritel dan Program

Quality of Retail and Program Loan Segments

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020
Total Kredit Bermasalah Total Non-performing Loans	34.879	303.500
Total Kredit yang Diberikan (Gross) Total Loans (Gross)	3.234.830	4.828.323
Rasio Kredit Bermasalah (NPL Gross) Non-performing Loans Ratio (NPL Gross)	1,08%	6,29%

Profitabilitas Segmen Ritel dan Program

Retail and Program Segment Profitability

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pendapatan Bunga Interest income	371.238	426.036	(54.798)	(12,86%)
Beban Bunga Interest expense	(228.899)	(269.451)	40.552	(15,05%)
Pendapatan Bunga - Neto Interest Income - Net	142.339	156.584	(14.246)	(9,10%)
Pendapatan Operasi Lainnya Other Operating Income	12.950	10.436	2.514	24,09%
Beban Operasi Lainnya Other Operating Expenses	(64.478)	(49.907)	(14.572)	29,20%
Penyisihan Kerugian Penurunan Nilai Allowance for Impairment Losses	(63.106)	29.351	(92.456)	(315,01%)
Pendapatan Non Operasional - Neto Income Tax Expense - Net	33	1.068	(1.036)	(96,92%)
Laba Sebelum Beban Pajak Penghasilan Profit Before Income Tax Expense	27.738	147.533	(119.795)	(81,20%)
Beban Pajak Penghasilan - Neto Income Tax Expense - Net	(4.629)	(75.551)	70.922	(93,87%)
Laba Tahun Berjalan Current year profit	23.109	71.981	(48.873)	(70,76%)
Aset Segmen Segment Assets	2.862.392	4.353.802	(1.491.410)	(34,26%)
Liabilitas Segmen Segment Liability	4.225.377	4.905.479	(680.103)	(13,86%)

Segmen Kredit Konsumer Legacy Legacy Consumer Credit Segment

Segmen konsumen ini sudah tidak melakukan ekspansi, dan kredit-kredit yang masih memiliki *outstanding* akan dialihkan melalui pihak ketiga. Segmen Konsumer akan difokuskan kepada pengembangan produk digital Pinang Konsumer.

Strategi yang Diterapkan

Sesuai dengan arah kebijakan manajemen dan strategi perusahaan terkait transformasi bisnis Bank Raya, maka seluruh Debitur produk bisnis konsumer konvensional akan dialihkan kepada pihak ketiga dalam jangka waktu 5 Tahun yaitu mulai dari Tahun 2021 sampai dengan 2025. Namun demikian, beberapa produk konsumer yang tetap dipertahankan dan akan dikembangkan sejalan dengan arah transformasi bisnis Bank Raya antara lain:

1. Adapun produk konsumer yang tetap dipertahankan yaitu Agro mobil, Agro Berguna (Pinjaman Karyawan Bank Raya), Teman Bergriya (Pinjaman Karyawan Bank Raya), KPRS, Agro Griya (Kredit Kualitas Rendah), Kretapsun (kredit kualitas rendah) dan Multiguna (kredit kualitas rendah)
2. Sesuai komitmen Bank Raya dengan Pemerintah maka Bank Raya tetap menyalurkan Kredit Program KPR Subsidi (FLPP dan SBUM) berdasarkan kuota yang telah ditetapkan oleh Pemerintah.
3. Guna mengakomodir kebutuhan dan layanan bagi pekerja internal Bank Raya maka produk Agro Teman pengembangannya dilakukan tetap dipertahankan dan akan dikembangkan pemberian kreditnya secara digitalisasi.
4. Pengembangan *Ecosystem Partnership* akan dibarengi dengan pemberian *gimmick* kepada *Anchor/Offtaker Ecosystem* dalam bentuk pemberian kredit bagi pegawai dan pengurus berupa kredit bagi pekerja tetap (Kretap), *Car Ownership Programme* (COP), dan *Home Ownership Programme* (HOP).
5. Pelaksanaan *revamp* secara bertahap dimungkinkan Bank Raya bekerjasama dengan pihak ketiga untuk melakukan *Asset Sales* dimana Bank Raya akan mendapatkan *Fee Based Income*.

Tantangan yang Dihadapi

Tantangan yang dihadapi oleh Bank Raya adalah perusahaan asuransi yang ada belum mengcover kembali penyaluran fasilitas pinjaman konsumer KPR Subsidi dan juga pada saat yang sama kondisi ekonomi belum pulih seutuhnya dikarenakan masih adanya pandemi Covid-19. Sedangkan, faktor eksternal yang paling mempengaruhi kinerja khususnya portofolio bisnis eksisting Bank Raya masih dipengaruhi oleh pandemi Covid-19 karena mengakibatkan ketidakpastian

This consumer segment is no longer expanding, and loans that still have outstanding will be transferred through third parties. The Consumer segment will focus on the development of Consumer Pinang digital products.

Implemented Strategy

In accordance with the direction of management policies and company strategies related to Bank Raya business transformation, all conventional consumer business product debtors will be transferred to third parties within a period of 5 years, starting from 2021 to 2025. However, several consumer products that will be maintained and will be developed in line with the direction of Bank Raya's business transformation include:

1. The consumer products that are maintained are Agro Mobil, Agro Useful (Bank Raya Employee Loans), Teman Bergriya (Bank Raya Employee Loans), KPRS, Agro Griya (Low Quality Credit), Kretapsun (low quality credit) and Multiguna (low quality credit).
2. In accordance with Bank Raya's commitment to the Government, Bank Raya continues to distribute Subsidized Mortgage Credit Programs (FLPP and SBUM) based on the quota set by the Government.
3. In order to accommodate the needs and services for Bank Raya's internal employees, the development of Agro Teman products will be maintained and digitalized lending will be developed.
4. The development of the *Ecosystem Partnership* will be accompanied by the provision of gimmicks to *Anchor/Offtaker Ecosystem* in the form of providing credit for employees and management in the form of credit for permanent workers (Kretap), *Car Ownership Program* (COP), and *Home Ownership Program* (HOP).
5. It is possible for Bank Raya to implement a gradual *revamp* in cooperation with third parties to conduct *Asset Sales* where Bank Raya will get *Fee Based Income*.

Challenges Faced

The challenge faced by Bank Raya is that the existing insurance companies have not covered the distribution of subsidized mortgage consumer loan facilities and at the same time the economic condition has not fully recovered due to the Covid-19 pandemic. Meanwhile, the external factors that most affect performance, especially Bank Raya's existing business portfolio, are still affected by the Covid-19 pandemic because it causes global economic uncertainty so that

ekonomi global sehingga perbankan nasional khususnya Bank Raya ikut serta melakukan antisipasi dengan mengelola kualitas kredit melalui restrukturisasi fasilitas kredit.

Kinerja Segmen Konsumer Tahun 2021

Tahun 2021, segmen Konsumer membukukan kinerja yang cukup baik. Jumlah kredit yang disalurkan segmen konsumer tahun 2021 mencapai Rp827,04 miliar, meningkat/lebih rendah dibandingkan tahun sebelumnya Rp1.148,59 miliar. Kenaikan/Penurunan tersebut disebabkan transformasi dan pengalihan pengelolaan bisnis untuk lebih fokus kepada produk digital.

Kinerja Kredit Konsumer Per Jenis Produk

national banks, especially Bank Raya, participate in anticipating by managing credit quality through restructuring credit facilities.

Consumer Segment Performance in 2021

In 2021, the Consumer segment posted a fairly good performance. The number of loans disbursed by the consumer segment in 2021 will reach IDR 827.04 billion, increased/lower than the previous year of IDR 1,148.59 billion. The increase/decrease was caused by transformation and transfer of management to place a greater emphasis on digital products.

Consumer Loan Performance by Product Type

dalam jutaan Rupiah/in million rupiah

Nama Produk Product name	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Agro Mobil Agro Mobil	1.568	3.277	(1.079)	(52.15%)
Agro Multiguna Multipurpose Agro	14.639	26.744	(12.105)	(45.26%)
Agro Griya (Komersil) Agro Griya (Commercial)	306.820	374.289	(67.469)	(18.03%)
KPRS-FLPP KPRS-FLPP	102.268	87.625	14.643	16.71%
Kredit Karyawan Tetap Permanent Employee Loan	387.717	628.158	(240.441)	(38.28%)
Kredit Pensiun Pension Loan	11.752	21.197	(9.445)	(44.56%)
Kredit Santunan Hari Tua Retirement Compensation Loan	2.280	7.298	(5.018)	(68.76%)
Total Total	827.044	1.148.588	(321.544)	(27.99%)

Kualitas Kredit Konsumer

Consumer Loan Quality

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020
Total Kredit Bermasalah Total Non-performing Loans	5.857	50.701
Total Kredit yang Diberikan (Gross) Total Loans (Gross)	827.044	1.158.293
Rasio Kredit Bermasalah (NPL Gross) Non-performing Loans Ratio (NPL Gross)	0,71%	4,38%

Profitabilitas Segmen Konsumer

Consumer Segment Profitability

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pendapatan bunga Interest income	106.610	123.381	(16.771)	(13,59%)
Beban bunga Interest expense	(43.240)	(29.112)	(14.127)	48,53%
Pendapatan bunga - neto Interest income - net	63.371	94.269	(30.899)	(32,78%)
Pendapatan operasi lainnya Other operating income	13.574	4.637	8.938	192,76%
Beban operasi lainnya Other operating expenses	(19.407)	(17.804)	(1.603)	9,01%
Penyisihan kerugian penurunan nilai Allowance for impairment losses	(16.805)	(3.780)	(13.025)	344,57%
Pendapatan non operasional - neto Non-operating income - net	148	264	(116)	(44,11%)
Laba sebelum beban pajak penghasilan Profit before income tax expense	40.881	77.586	(36.706)	(47,31%)
Beban pajak penghasilan - neto Income tax expense - net	(3.303)	(39.732)	36.428	(91,69%)
Laba tahun berjalan Current year profit	37.577	37.854	(277)	(0,73%)
Aset Segmen Segment Assets	785.352	1.081.901	(296.549)	(27,41%)
Liabilitas Segmen Segment Liability	827.296	573.457	253.840	44,26%

Bisnis Digital Digital Business

Visi dan Misi Bisnis Digital adalah untuk mengoptimalkan produk Digital Bank Raya dari sisi aset dan liabilitas yang sudah ada maupun baru. Serta fokus berkolaborasi dengan para pelaku *financial technology (Fintech)* di berbagai bidang industri untuk menggali potensi bisnis dan kerjasama yang kolaboratif, inovatif, dan elaboratif demi terwujudnya ekosistem digital.

Bisnis Digital memiliki fungsi dan tanggung jawab dalam mengarahkan dan mengkoordinasikan penyusunan, memonitor dan melakukan penetapan strategi bisnis Produk *Digital Banking* Bank Raya, baik simpanan maupun pinjaman. Selain itu, memonitor pengembangan dan pengelolaan produk *Digital Banking* terhadap kerjasama dengan *Fintech* sebagai penyedia *platform*, penetapan pasar sasaran kredit

The Vision and Mission of Digital Business is to optimize Bank Raya's Digital products in terms of existing and new assets and liabilities. And focus on collaborating with financial technology (Fintech) players in various industrial fields to explore business potential and collaborative, innovative, and elaborative collaborations for the realization of a digital ecosystem.

Digital Business has functions and responsibilities in directing and coordinating the preparation, monitoring and determination of Bank Raya's Digital Banking Product business strategy, both deposits and loans. In addition, monitoring the development and management of Digital Banking products in collaboration with Fintech as a platform provider, determining acceptable target market, business

yang dapat diterima, profil bisnis kredit dan simpanan Digital yang dilayani. Hal itu dalam rangka mendukung pencapaian target bisnis *Digital Banking* yang *prudent* dan menguntungkan, sesuai dengan kebutuhan pasar serta prosedur dan ketentuan yang berlaku.

profiles of credit and Digital deposits served. This is in order to support the achievement of prudent and profitable Digital Banking business targets, in accordance with market needs and applicable procedures and provisions.

Segmen Kredit Ritel Digital Digital Retail Credit Segment

Pengembangan Segmen Ritel Digital akan difokuskan kepada produk Pinang Maksima (*Agri Crawl Up*) & Pinang Performa.

The development of the Digital Retail Segment will focus on Pinang Maksima (*Agri Crawl Up*) & Pinang Performa products.

Strategi yang Diterapkan

Selama tahun 2021, strategi yang telah dijalankan oleh Bank Raya antara lain sebagai berikut:

Implemented Strategy

During 2021, the strategies that have been implemented by Bank Raya are as follows:

Strategi Pinang Maksima

- Memasarkan Produk Kredit Ritel *Agri Crawl Up & Beyond Partnership* melalui Program pemasaran Pinang Maksima untuk men-support pendanaan mulai dari Rp100 juta s.d Rp1 Miliar kepada sektor Agribisnis maupun sektor Non Agribisnis
- Memasarkan Program pemasaran Pinang Maksima melalui *Bundling* dengan Asuransi Sandrina dan Jamkrida
- Memasarkan Program pemasaran Pinang Maksima untuk men-support pendanaan dengan plafon Rp1 Miliar s.d Rp3 Miliar kepada sektor Agribisnis maupun sektor Non Agribisnis selama bulan November s.d Desember 2021
- Menjalankan Ekosistem *Partnership* untuk Program Pembiayaan *Vendor Financing* dengan pihak Swasta melalui pola kerjasama (MOU) diantaranya dengan SiCepat dan Widodo Makmur Group.
- Adanya usulan Program akuisisi *vendor* BRI Group (*uncommitted line*) terkait dengan fasilitas Bank Garansi dan pembiayaan Pinang Maksima kepada *Vendor*.
- Memaksimalkan Program Penyaluran KUR Super Mikro, KUR Mikro, dan KUR Super Mikro baik dengan *Offtaker* maupun tanpa *offtaker*.

Areca Maksima Strategy

- Marketing the *Agri Crawl Up & Beyond Partnership* Retail Credit Products through the Pinang Maksima marketing program to support funding ranging from IDR 100 million to IDR 1 billion for the Agribusiness and Non-Agribusiness sectors
- Marketing the Pinang Maksima marketing program through *Bundling* with Sandrina Insurance and Jamkrida
- Marketing the Pinang Maksima marketing program to support funding with a ceiling of IDR 1 billion to IDR 3 billion for the Agribusiness sector and the Non Agribusiness sector during November to December 2021
- Running a *Partnership Ecosystem* for *Vendor Financing* Programs with private parties through a cooperation pattern (MOU) including with SiCepat and Widodo Makmur Group.
- There is a proposed BRI Group vendor acquisition program (*uncommitted line*) related to Bank Guarantee facilities and Pinang Maksima financing to Vendors.
- Maximizing the Super Micro KUR, Micro KUR, and Super Micro KUR distribution programs both with and without *offtaker*.

Strategi Pinang Performa

Dalam rangka mendukung transformasi bisnis Bank Raya, Pinang Performa sebagai salah satu model bisnis baru diharapkan dapat memberikan kontribusi kepada Bank Raya. Strategi Pinang Performa tahun 2021 - 2023 adalah sebagai berikut:

- a. Pinjaman segmen mikro (s.d. Rp100 juta) dengan fokus pembiayaan pada *merchant-supplier ecosystem*.
- b. Pengembangan aplikasi digital yang akan digunakan oleh Tenaga Pemasar (*Account Officer*) untuk melakukan proses inisiasi prakarsa pinjaman secara cepat dan mudah dengan tingkat risiko yang terukur.

Pinang Performa Strategy

In order to support Bank Raya's business transformation, Pinang Performa as a new business model is expected to contribute to Bank Raya. The Pinang Performa Strategy for 2021 - 2023 is as follows:

- a. Micro segment loans (up to IDR 100 million) with a financing focus on the merchant - supplier ecosystem.
- b. Development of digital applications that will be used by Marketers (*Account Officers*) to initiate the loan initiative initiation process quickly and easily with a measurable level of risk.

- c. Model bisnis yang dikembangkan melalui 2 pendekatan model bisnis, optimalisasi *value chain Fintech Ecosystem Partnership* dan *Agent & Community Partnership* sebagai *Lead Acquisition*.
- d. Pengembangan *Credit Scoring* yang komprehensif sehingga proses analisa pinjaman dapat dilakukan lebih objektif dan cepat serta memberikan kepastian kepada *Customer*.

Produk Digital Segmen Ritel

Pinang Ritel (*Agri Crawl Up*)

Produk kredit ritel yang dimiliki Bank Raya adalah sebagai berikut:

1. Pinang Ritel (Pinang Maksima)
 - a. Kredit Modal Kerja
 - Pinjaman Rekening Koran (PRK)
 - Pinjaman Tetap Angsuran (PTA)
 - Pinjaman Tetap Reguler (PTR) / *Withdrawal Approval*
 - b. Kredit Investasi
 - Sebelum/Masa Pembangunan (*Pre Financing/ Project Financing*)
 - Setelah masa pembangunan (*Refinancing*)
2. Kredit Ritel Program
Kredit Usaha Rakyat (KUR). Merupakan kredit pembiayaan modal kerja dan/atau investasi kepada debitur perorangan, badan usaha atau kelompok usaha yang produktif dan layak, namun belum memiliki agunan tambahan atau agunan tambahan belum cukup.
3. Kredit *Uncommitted Line*
Bank Garansi adalah produk UCL yang ditawarkan oleh Bank Raya berupa garansi yang diterbitkan dalam bentuk warkat untuk menjamin pengerjaan proyek, pengadaan barang dan atau jasa atas dasar Kontrak Kerja atau dokumen sejenis beserta amendemennya. Bank garansi akan aktif apabila pihak yang dijamin cidera janji (wanprestasi). pemberian Fasilitas Bilyet Giro difokuskan kepada *Vendor/Mitra Korporasi BRI Group*.

Pinang Performa

Pinang Performa adalah kredit yang bersifat umum, individual, selektif dan berbunga wajar yang fokus pada pembiayaan sektor produktif segmen mikro dengan plafond pinjaman sd Rp100.000.000,- (seratus juta rupiah). Penyaluran kredit Pinang Performa berbasis digital proses yang mengutamakan keamanan, kecepatan dan kemudahan dengan SLA 2 hari kerja. Target segmen Pinang Performa adalah Mitra (*Merchant/Supplier*) yang tergabung dalam ekosistem bisnis *Partnership* Bank Raya. Produk Pinang Performa terbagi menjadi 2 (dua) model pembiayaan yaitu:

1. Angsuran Tetap
Kredit investasi maupun modal kerja dengan jangka waktu sd 12 bulan yang pola pembayarannya dapat dicicil sesuai siklus usaha, yaitu secara bulanan, 3 bulanan, 4 bulanan, 6 bulanan, dan 12 bulanan.

- c. The business model developed through 2 business model approaches, value chain optimization of *Fintech Ecosystem Partnership* and *Agent & Community Partnership* as *Lead Acquisition*.
- d. Development of a comprehensive *Credit Scoring* so that the loan analysis process can be carried out more objectively and quickly as well as provide certainty to customers.

Retail Segment Digital Products

Pinang Retail (*Agri Crawl Up*)

Retail credit products owned by Bank Raya are as follows:

1. Pinang Retail (Pinang Maksima)
 - a. Working capital credit
 - Current Account Loan (PRK)
 - Fixed Installment Loans (PTA)
 - Regular Fixed Loans (PTR) / *Withdrawal Approval*
 - b. Investment Credit
 - Before/Development Period (*Pre Financing/ Project Financing*)
 - After the development period (*Refinancing*)
2. Retail Credit Program
Kredit Usaha Rakyat (KUR). Is a working capital and/or investment financing credit to individual debtors, business entities or business groups that are productive and feasible, but do not have additional collateral or the additional collateral is not enough.
3. *Uncommitted Line Credit*
Bank Guarantee is a UCL product offered by Bank Raya in the form of a guarantee issued in the form of a script to guarantee project work, procurement of goods and or services on the basis of a Work Contract or similar document along with its amendments. The bank guarantee will be active if the guaranteed party is in default (default). The Transfer Form Facilities is focused on Vendors/Corporate Partners of the BRI Group.

Pinang Performa

Pinang Performa is a general, individual, selective and reasonable interest loan that focuses on financing the productive sector of the micro segment with a loan limit of up to IDR 100,000,000 (one hundred million rupiah). Pinang Performa credit distribution is a digital-based process that prioritizes security, speed and convenience with an SLA of 2 working days. The Pinang Performa segment target is Partners (*Merchant / Supplier*) who are members of the *Partnership* business ecosystem of Bank Raya. Pinang Performa products are divided into 2 (two) financing models, namely:

1. Fixed Installment
Investment and working capital loans with maturities of up to 12 months whose payment patterns can be paid in installments according to the business cycle, namely monthly, 3 months, 4 months, 6 months, and 12 months.

2. Transaksional

Kredit modal kerja dengan jangka waktu sampai dengan 12 bulan dengan cara memberikan plafon/limit transaksi yang pencairannya dapat fleksibel disesuaikan dengan kebutuhan usaha. Pola pembayarannya pun dapat secara harian ataupun mingguan dan perhitungan bunga sesuai dengan penggunaan dan lama hari meminjam.

3. Merchant/Supplier Financing

Kredit modal kerja dengan jangka waktu sd 12 bulan dengan cara memberikan plafon/limit transaksi yang terintegrasi dengan Partner Bank Raya. Pencairan pinjamannya dapat digunakan untuk bertransaksi dengan *Partner Bank Raya* seperti pembayaran *Invoice* atau *Delivery Order* dan pemenuhan *Purchase Order* atau Kontrak Kerja bagi Mitra. Pola pembayarannya pun dapat fleksibel secara harian ataupun mingguan dan perhitungan bunga sesuai dengan penggunaan dan lama hari meminjam.

Channel pengajuan Pinang Performa dapat melalui *Community Branch Bank Raya*, *Tenaga Pemasar Bank Raya* dan *Partner Bank Raya*. Proses pengajuan sudah melewati proses otomasi dan digitalisasi untuk mempercepat proses pinjaman seperti *prescreening* (terhubung dengan sistem Dukcapil, SLIK, SICD, SIKP, DHN, DHIB dan LPG Bank Raya), *geotagging location*, simplifikasi form analisa usaha dan finansial, validasi analisa dan rekomendasi pinjaman, dokumentasi kredit dan proses pencairan.

Tantangan yang Dihadapi

Tantangan yang dihadapi Pinang Maksima adalah dikarenakan ekonomi belum pulih seutuhnya, maka Bank Raya melakukan penyaluran fasilitas pinjaman dengan tetap memperhatikan prinsip kehati-hatian. Hal ini dapat dilihat dengan adanya pengembangan sistem Pinang Maksima yang terintegrasi dengan *Scoring Process*. Selain itu, saat ini sedang ada usulan pengembangan produk Pinang Maksima yang ditujukan untuk melayani ekosistem bisnis di sektor *agri & beyond* beserta seluruh *supply chain* bisnisnya dengan *ticket size* antara Rp100 juta s.d Rp1 Miliar.

Tantangan yang dihadapi Pinang Performa adalah meningkatnya kasus Covid-19 yang menyebabkan melambatnya kondisi perekonomian khususnya di sektor UMKM. Pinang Performa tetap berjalan dengan menyasar calon debitur yang dapat berjualan secara *online*. Selain itu, sebagai produk baru di Bank Raya sehingga masih membutuhkan waktu untuk penyempurnaan baik dari sisi produk maupun aplikasi digital untuk semakin mempermudah proses dan dapat menggarap target *market* yang lebih luas.

2. Transactional

Working capital credit with a term of up to 12 months by providing a transaction ceiling/limit whose disbursement can be flexible according to business needs. The payment pattern can be daily or weekly and the interest calculation is in accordance with the use and length of the day to borrow.

3. Merchant/Supplier Financing

Working capital credit with a term of up to 12 months by providing a transaction ceiling/limit that is integrated with Bank Raya Partners. The loan disbursement can be used for transactions with Bank Raya Partners such as payment of Invoices or Delivery Orders and fulfillment of Purchase Orders or Work Contracts for Partners. The payment pattern can also be flexible on a daily or weekly basis and the calculation of interest is according to usage and length of days borrowed.

The Pinang Performa submission channel can be through Bank Raya Community Branch, Bank Raya Marketers and Bank Raya Partners. The application process has gone through an automation and digitization process to speed up the loan process such as *prescreening* (connected to the Dukcapil, SLIK, SICD, SIKP, DHN, DHIB and LPG Bank Raya systems), *geotagging locations*, simplification of business and financial analysis forms, validation of analysis and loan recommendations, credit documentation and disbursement process.

Challenges Faced

The challenge faced by Pinang Maksima is that because the economy has not fully recovered, Bank Raya has disbursed loan facilities while still paying attention to the principle of prudence. This can be seen with the development of the Pinang Maksima system that is integrated with the *Scoring Process*. In addition, there is currently a proposal for the development of the Pinang Maksima product which is intended to serve the business ecosystem in the *agri & beyond* sector and its entire business supply chain with ticket sizes between IDR 100 million to IDR 1 billion.

The challenge faced by Pinang Performa is the increasing number of Covid-19 cases, which causes a slowdown in economic conditions, especially in the MSME sector. Pinang Performa continues to run by targeting prospective debtors who can sell online. In addition, as a new product at Bank Raya, it still takes time to improve both in terms of products and digital applications to further simplify the process and be able to work on a wider target market.

Strategi Pengembangan Segmen Kredit Ritel 2022

Dikarenakan ekonomi belum pulih seutuhnya, Bank Raya akan melakukan penyaluran fasilitas pinjaman dengan tetap memperhatikan prinsip kehati-hatian. Hal ini dapat didukung dengan adanya pengembangan sistem Aplikasi Pinang Maksima yang terintegrasi dengan *Credit Scoring Engine* (CSE). Selain itu, strategi pengembangan pembiayaan Produk Pinang Ritel (Maksima) berfokus kepada pembiayaan melalui *Supply Chain Ecosystem Partnership* (Mitra Korporasi BRI Group, *Ecosystem BRI Group*, Mitra Korporasi Debitur/Nasabah Eksisting, Mitra Aggregator, Mitra Fintech/E-commerce) dengan *ticket size* saat ini sedang ada usulan pengembangan produk Pinang Maksima yang ditujukan untuk melayani ekosistem bisnis di sektor *agri & beyond* beserta seluruh *supply chain* bisnisnya dengan *ticket size* antara Rp100 juta s.d Rp1 Miliar.

Strategi Pengembangan Pinang Performa 2022

Strategi pengembangan di tahun 2022 fokus untuk dapat memperluas target market yang dapat digarap dan memperkuat proses digitalisasi. Beberapa strategi inisiatif Pinang Performa tahun 2022 adalah sebagai berikut:

1. Pengembangan service API yang dapat digunakan dengan berbagai aplikasi *Partner*. Pengembangan API ini fokus pada *service* untuk *Pipeline Management*, *Flow Proses Management*, *Loan Origination*, *Disbursement Loan*, *Loan Monitoring* dan *Database Integration*.
2. Pengembangan Pinang Performa *for End Customer* dimana proses *credit underwriting* yang *e2e* secara digital dimana *Customer* dapat mengajukan pinjaman secara langsung melalui aplikasi digital yang terintegrasi dengan sistem Pinang Performa, proses analisa kelayakan usaha yang dilakukan oleh *Credit Scoring System* yang cepat dan akurat.

2022 Retail Loan Segment Development Strategy

Due to the fact that the economy has not fully recovered, Bank Raya will disburse loan facilities with due regard to the principle of prudence. This can be supported by the development of the Pinang Maksima Application system that is integrated with the Credit Scoring Engine (CSE). In addition, the Retail Pinang Product (Maksima) financing development strategy focuses on financing through the Supply Chain Ecosystem Partnership (BRI Group Corporate Partners, BRI Group Ecosystems, Debtor Corporate Partners/Existing Customers, Aggregator Partners, Fintech Partners/E-commerce) with *ticket size* Currently, there is a proposal for the development of the Pinang Maksima product which is intended to serve the business ecosystem in the *agri & beyond* sector and its entire business supply chain with *ticket sizes* between IDR 100 million to IDR 1 billion.

Pinang Performa Development Strategy 2022

The development strategy in 2022 is focused on expanding the target market that can be worked on and strengthening the digitization process. Some of the Pinang Performa initiative strategies in 2022 are as follows:

1. Development of API services that can be used with various *Partner* applications. This API development focuses on services for *Pipeline Management*, *Process Flow Management*, *Loan Origination*, *Disbursement Loans*, *Loan Monitoring* and *Database Integration*.
2. Development of Pinang Performa *for End Customers* where the *e2e* credit underwriting process is digital where *Customers* can apply for loans directly through digital applications that are integrated with the Pinang Performa system, the business feasibility analysis process carried out by the *Credit Scoring System* is fast and accurate.

Segmen Kredit Konsumer Digital Digital Consumer Credit Segment

Strategi Pinang Flexi

Dalam rangka mendukung transformasi bisnis Bank Raya, Pinang Flexi sebagai salah satu produk yang sudah "Live" terus melakukan pengembangan-pengembangan untuk memberikan kontribusi terbaik kepada Bank Raya. Strategi Pinang Flexi tahun 2021-2023 adalah sebagai berikut:

- a. Peningkatan loyalitas nasabah melalui pengembangan *feature Privilege* (*pre-approve* pinjaman) khusus untuk debitur/nasabah terpilih serta program marketing untuk meningkatkan *awareness* nasabah kepada PINANG.
- b. Membuka akses *market share* ke nasabah existing BRI dan Bank Raya.

Pinang Flexi Strategy

In order to support Bank Raya's business transformation, Pinang Flexi as one of the "Live" products continues to make developments to provide the best contribution to Bank Raya. The Pinang Flexi Strategy for 2021 - 2023 is as follows:

- a. Increasing customer loyalty through the development of *Privilege features* (*pre-approve* loans) specifically for selected debtors/customers as well as marketing programs to increase customer awareness of PINANG.
- b. Opening access to *market share* for existing BRI and Bank Raya customers.

- c. Perubahan model bisnis dari B2C menjadi B2B2C melalui pengembangan Pinang API dan Webview sehingga dapat berintegrasi dengan pihak ketiga.
- d. Pengembangan *Paylater* untuk melayani kebutuhan pinjaman <30 hari.
- e. Inisiasi kerjasama dengan pihak ketiga baik untuk e-commerce, agen, *fintech* dan lainnya untuk meningkatkan ekspansi pinjaman konsumen.
- f. Melakukan *breakdown* target Pinang Konsumer ke unit kerja untuk mendukung peningkatan *outstanding* dan perusahaan kerjasama.
- g. Pengembangan *Credit Scoring* sehingga dapat dilakukan perluasan target market Pinang menjadi *existing customer* (2021) dan *mass market* (2022).
- h. Pengembangan sistem *autodebet* yang lebih *advance* untuk menjaga kolektibilitas pinjaman dan memitigasi pemburukan kualitas.

Strategi Channeling

Untuk mendukung pertumbuhan kredit yang inovatif dan sebagai *new business model proportion*, maka dalam pemberian kredit pada sektor *channeling* akan fokus pada pembiayaan kepada sektor produktif di Agri dan non agri serta sektor konsumtif melalui *partner P2P Lending* dengan fokus strategi:

- a. *Re-Focussing* pembiayaan *channeling P2P* pada segmen Retail Komersial dan Konsumer dengan tetap memperhatikan Tata Kelola *Channeling P2P Lending*.
- b. Menyusun Kebijakan dan Prosedur penyaluran Kredit *Channeling P2P Lending*.
- c. Bermitra dengan *partner P2P lending* yang dapat memberikan nilai tambah kepada perusahaan melalui bisnis turunan dengan menggandeng mitra yang memiliki ekosistem bisnis
- d. Dalam rangka pemberian kredit yang sehat, membatasi kerjasama dengan *partner P2P lending* yang memiliki TKB > 95 atau dibawah TKB tersebut dengan adanya pertimbangan khusus.
- e. Membatasi tingkat kredit bermasalah untuk mitra maksimal 5%.
- f. Menyusun dan mengembangkan *digital platform* dalam proses penyaluran kredit dengan skema *channeling* agar terciptanya efisiensi *business flow*, kecepatan dan akurasi pemberian kredit.
- g. Menjalinkan kolaborasi strategis dengan *Venture Capital* seperti BRI *Venture* (bagian dari BRI Group) untuk melakukan analisa dan kajian *potential P2P Lending* dari sudut pandang *Venture Capital*.

Strategi Ecosystem Partnership

Dalam rangka mendukung strategi perusahaan menjadi *Digital Banking for Agribusiness and Beyond*, maka strategi *ecosystem partnership* menjadi sangat vital dalam membangun *ecosystem closed loop business* diantaranya dengan :

- c. Change of business model from B2C to B2B2C through the development of Pinang API and Webview so that it can integrate with third parties.
- d. *Paylater* development to serve loan needs <30 days.
- e. Initiating collaboration with third parties for e-commerce, agents, *fintech* and others to increase consumer loan expansion.
- f. Do a *breakdown* of consumer Pinang targets to work units to support the increase in outstanding and cooperative companies.
- g. Development of *Credit Scoring* so that the target market for Pinang can be expanded to existing customers (2021) and mass market (2022).
- h. Development of a more advanced auto-debit system to maintain loan collectibility and mitigate quality deterioration.

Channeling Strategy

To support innovative credit growth and as a new business model proportion, in lending to the channeling sector, it will focus on financing the productive sector in Agri and non-agriculture as well as the consumptive sector through P2P Lending partners with a strategic focus:

- a. *Re-Focussing* P2P channeling financing in the Retail Commercial and Consumer segments while still paying attention to P2P Lending Channeling Governance.
- b. Develop Policies and Procedures for channeling P2P Lending Credit.
- c. Partnering with P2P lending partners who can provide added value to companies through derivative businesses by cooperating with partners who have a business ecosystem
- d. In the context of providing healthy credit, limiting cooperation with P2P lending partners who have a TKB > 95 or below the TKB with special considerations.
- e. Limiting the non-performing loan rate for partners to a maximum of 5%.
- f. Develop and develop a digital platform in the credit distribution process with a channeling scheme in order to create business flow efficiency, speed and accuracy of lending.
- g. Establish strategic collaborations with *Venture Capital* such as BRI *Venture* (part of the BRI Group) to conduct analysis and study of potential P2P Lending from the perspective of *Venture Capital*.

Ecosystem Partnership Strategy

In order to support the company's strategy to become Digital Banking for Agribusiness and Beyond, the ecosystem partnership strategy is very vital in building a closed loop business ecosystem, including by:

- Menggandeng *strategic partner* baik *fintech*, startup maupun *ecosystem players* lainnya untuk menjalankan bisnis berbasis ekosistem.
- Menjadi *Bank as a Services* dengan menggunakan layanan Open API untuk menjadi *House of Fintech & Home for Gig Economy*.
- Membangun kapabilitas bisnis dengan skema *business to business to customer* (B2B2C).
- Memaksimalkan kolaborasi dengan BRI sebagai Induk untuk mengembangkan ekosistem bisnis yang telah ada dan menggali bisnis turunan untuk ekosistem Bank BRI.

- Collaborating with strategic partners, both fintech, startups and other ecosystem players to run an ecosystem-based business.
- Become a Bank as a Services by using Open API services to become a House of Fintech & Home for Gig Economy.
- Building business capabilities with a business to business to customer (B2B2C) scheme.
- Maximizing collaboration with BRI as the parent to develop the existing business ecosystem and explore derivative businesses for the BRI Bank ecosystem.

Produk Digital Segmen Konsumer Consumer Segment Digital Products

Pinang Flexi

Adalah pinjaman multiguna digital pertama dari industri perbankan di Indonesia milik Bank Raya untuk nasabah Bank Raya & BRI. Seluruh proses Pinang Flexi menggunakan teknologi (*fully digital*) yang dapat diakses melalui aplikasi Pinang di playstore sehingga proses lebih cepat, mudah, dapat diakses kapanpun dan dimanapun.

Proses analisa pinjaman menggunakan digital *pre screening* dan *credit scoring*. Selain itu juga untuk menjaga keamanan, Pinang Flexi menerapkan teknologi *liveness detection*, *face recognition* dan *digital sign*.

Pinang Flexi terdiri dari:

- Cicilan Jangka Pendek**
Pinjaman multiguna untuk nasabah Bank Raya dan BRI dengan plafon maksimal Rp25 juta dan jangka waktu maksimal 18 bulan. Suku bunga yang dikenakan adalah 1,24%. Pola pembayaran harian digunakan untuk pinjaman dengan jangka waktu maksimal 30 hari, sedangkan angsuran bulanan digunakan untuk jangka waktu Pinjaman 1-18 bulan.
- Cicilan Jangka Panjang**
Pinjaman multiguna khusus untuk pekerja Bank Raya dengan maksimal plafond Rp500 juta dan jangka waktu maksimal 15 tahun. Suku bunga adalah 9,75% efektif dengan pola angsuran bulanan.

Pinang Connect

Fasilitas Pinjaman yang diberikan kepada debitur yang melakukan pengajuan melalui mitra Platform P2P Bank Raya. Pencairannya menggunakan digital loan origination dan memberikan real time performance dashboard untuk mitra Bank Raya.

Plafon untuk Pinang Connect adalah maksimal sebesar Rp1 miliar dengan tenor 1- 12 bulan.

Pinang Flexi

This is the first digital multipurpose loan from the banking industry in Indonesia belonging to Bank Raya for Bank Raya & BRI customers. The entire Pinang Flexi process uses technology (*fully digital*) which can be accessed through the Pinang application on the Playstore so that the process is faster, easier, accessible anytime and anywhere.

The loan analysis process uses digital pre-screening and credit scoring. In addition, to maintain security, Pinang Flexi applies liveness detection, face recognition and digital sign technology.

Pinang Flexi consists of:

- Short-Term Installment**
Multipurpose loan for Bank Raya and BRI customers with a maximum ceiling of IDR 25 million and a maximum period of 18 months. The interest rate charged is 1.24%. The daily payment pattern is used for loans with a maximum term of 30 days, while monthly installments are used for loan periods of 1-18 months.
- Long Term Installment**
Multipurpose loan specifically for Bank Raya employees with a maximum limit of IDR 500 million and a maximum period of 15 years. The interest rate is 9.75% effective with a monthly installment pattern.

Pinang Connect

Loan facilities are made available to debtors who apply through Bank Raya's P2P Platform partners. The disbursement utilizes digital loan origination and gives Bank Raya partners with a real-time performance dashboard.

Pinang Connect may borrow up to IDR 1 billion for a period of one to twelve months

Pinang Paylater

Pinjaman digital untuk segmen konsumen yang diberikan kepada debitur secara end-to-end melalui mitra Platform Bank Raya (BRILink, Payfazz). Pinjaman tidak menggunakan agunan, dan persyaratan yang mudah menggunakan e-KYC dan digital signature serta tertanam di Platform Agen.

Plafon untuk *Paylater* adalah sebesar Rp500 ribu s.d Rp25 juta dengan tenor maksimal 1 bulan.

Tantangan yang Dihadapi

Kerjasama dengan perusahaan kurang optimal yang disebabkan dampak dari pandemi Covid 19. Namun dengan adanya breakdown target Pinang Flexi ke uker Bank Raya maka pelaksanaan kerjasama dan pemasaran tidak hanya dilakukan oleh kantor Pusat saja tetapi juga unit kerja Bank Raya sehingga mendukung pencapaian target di tahun 2021.

Strategi Pengembangan Pinang Flexi 2022

- Perluasan target Market Pinang *Non Payroll*
Perluasan target market Pinang dari Nasabah *Payroll* ke *Non Payroll* sehingga tak hanya nasabah *payroll*, seluruh Nasabah Bank Raya & BRI dapat mengajukan Pinang Konsumer. Pinang *non payroll* menggunakan *Credit Scoring Join Model XG Boost* yang lebih *robust* sehingga kualitas kredit tetap terjaga.
- Pengembangan dan perluasan target *market Intraday Loan*
Penyaluran Pinang dengan pola harian/maks 30 hari akan diperluas ke seluruh agen BRILink di seluruh Indonesia. Didukung dengan pengembangan *Credit Scoring* keagenan sehingga pemberian kredit dapat lebih tepat dan kualitas terjaga. Selain itu juga, akan dilakukan kerjasama dengan *partner* lainnya yang memiliki bisnis keagenan.
- Pengembangan Pinang API dan Web
Pinang berintegrasi dengan *partner* (B2B2C) yang dapat diakses melalui API dan *web based*. Dengan implementasi API dan *web based* maka akan mempercepat proses akuisisi pinjaman karena dapat diakses melalui aplikasi/web pihak ketiga.
- Pengembangan Autodebet System
Pengembangan sistem *smart autodebet 2.0* dimana sistem dapat melakukan pendebitan secara AGF dan lintas rekening pada 1 CIF yang sama untuk memitigasi terjadinya kegagalan pembayaran karena kekurangan saldo atau perubahan no rekening nasabah.

Pinang Paylater

Consumer digital loans are offered end-to-end to borrowers via Bank Raya Platform partners (BRILink, Payfazz). The loan does not require collateral, and the terms are simple to understand and are embedded in the Agent Platform via e-KYC and digital signatures.

Paylater has a ceiling of IDR 500 thousand to IDR 25 million and a maximum tenor of one month.

Challenges Faced

Cooperation with companies is not optimal due to the impact of the Covid 19 pandemic. However, with the breakdown of the Pinang Flexi target to Bank Raya units, the implementation of cooperation and marketing is not only carried out by the Head Office but also Bank Raya work units so as to support the achievement of targets in 2021.

2022 Pinang Flexi Development Strategy

- Expansion of the non-payroll Pinang Market target
The expansion of the Pinang target market from Payroll Customers to Non Payroll so that not only payroll customers, all Bank Raya & BRI Customers can apply for Consumer Pinang. Non-payroll Pinang uses the Credit Scoring Join Model XG Boost which is more robust so that credit quality is maintained.
- Development and expansion of the Intraday Loan target market
Pinang distribution with a daily pattern/max 30 days will be extended to all BRILink agents throughout Indonesia. Supported by the development of agency Credit Scoring so that lending can be more precise and quality is maintained. In addition, cooperation with other partners who have agency businesses will also be carried out.
- Pinang API and Web Development
Pinang integrates with partners (B2B2C) which can be accessed via API and web based. With the implementation of API and web based, it will speed up the loan acquisition process because it can be accessed through 3rd party applications/webs.
- Development of Autodebit System
Development of a smart autodebit 2.0 system where the system can debit AGF and cross accounts at the same 1 CIF to mitigate payment failures due to lack of balance or changes in customer account numbers.

Kinerja Bisnis Digital

Digital Business Performance

dalam jutaan Rupiah/in million rupiah

Nama Produk Product name	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pinang Flexi	130.659	9.704	120.954	1.246,38%
Pinang Maxima	60.326	-	60.326	100,00%
Pinang Connect	284.062	59.556	224.506	376,97%
Pinang Performa	12.952	-	12.952	100,00%
Total	487.998	69.260	418.738	604,58%

Kualitas Kredit Bisnis Digital

Digital Business Loan Quality

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020
Total Kredit Bermasalah Total Non-performing Loans	371	1.214
Total Kredit yang Diberikan (Gross) Total Loans (Gross)	487.998	69.260
Rasio Kredit Bermasalah (NPL Gross) Non-performing Loans Ratio (NPL Gross)	0,08%	1,75%

Profitabilitas Bisnis Digital

Digital Business Profitability

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pendapatan bunga Interest income	39.489	12.591	26.898	213,63%
Beban bunga Interest expense	(9.333)	(4.776)	(4.556)	95,40%
Pendapatan bunga - neto Interest income - net	30.156	7.815	22.341	285,89%
Pendapatan operasi lainnya Other operating income	320	48	272	568,12%
Beban operasi lainnya Other operating expenses	(29.896)	(3.617)	(26.279)	726,61%
Penyisihan kerugian penurunan nilai Allowance for impairment losses	(9.199)	(2.077)	(7.122)	342,96%

dalam jutaan Rupiah/in million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pendapatan non operasional - neto Non-operating income - net	(159)	27	(186)	(682,12%)
Laba sebelum beban pajak penghasilan Profit before income tax expense	(8.777)	2.197	(10.974)	(499,58%)
Beban pajak penghasilan - neto Income tax expense - net	3.269	(1.125)	4.394	(390,59%)
Laba tahun berjalan Current year profit	(5.508)	1.072	(6.580)	(613,97%)
Aset Segmen Segment Assets	483.580	67.690	415.890	614,40%
Liabilitas Segmen Segment Liability	43.476	37.303	6.173	16,55%

Digital Saving

Strategi yang Diterapkan

Guna mendukung arah kebijakan manajemen perusahaan dalam rangka transformasi bisnis Bank Raya, maka dengan ini dikembangkan produk *digital saving* sebagai bentuk transformasi dari sisi simpanan, dengan strategi transformasi sebagai berikut:

- Pembukaan rekening tabungan dapat dilakukan melalui aplikasi Raya App.
- Melakukan pengembangan pembukaan rekening simpanan *online* tidak hanya untuk jenis simpanan tabungan melainkan juga untuk simpanan berupa deposito dan giro.
- Pembukaan rekening simpanan *online* dapat dilakukan baik oleh nasabah baru (*New CIF*) maupun nasabah *existing*.
- Pemasaran pembukaan rekening *online* dilakukan baik oleh KPO maupun unit kerja.
- Kemudahan mengajukan pinjaman dengan penawaran khusus (*Privilege* pengajuan Pinang).
- Melakukan pengembangan fitur yang menyesuaikan kebutuhan target pasar *Gig Economy* dengan pilihan jenis tabungan beragam dengan suku bunga menarik. Pengembangan fitur (*money bucket*) yang mampu memisahkan antara kebutuhan finansial, transaksi dan investasi nasabah.
- Melakukan pengembangan *platform* yang atraktif meliputi gamifikasi untuk meningkatkan ketertarikan nasabah dalam meningkatkan saldo tabungan, berbagai promo diskon, *voucher*, *cashback* dari *merchant* yang bekerja sama serta kemudahan dalam mengatur limit transaksi keuangan.

Implemented Strategy

In order to support the direction of the company's management policies in the context of Bank Raya's business transformation, digital saving products are hereby developed as a form of transformation from the savings side, with the following transformation strategy:

- Savings account opening can be done through the Raya App application.
- Developing online savings account openings not only for savings deposits but also for deposits in the form of time deposits and demand deposits.
- Opening an online savings account can be done by both new customers (*New CIF*) and existing customers.
- Marketing for online account openings is carried out by both KPOs and work units.
- Ease of applying for a loan with a special offer (*Privilege of Pinang submission*).
- Developing features that match the needs of the *Gig Economy* target market with a choice of various types of savings with attractive interest rates. Development of features (*money bucket*) that is able to separate between financial needs, transactions and customer investments.
- Developing an attractive platform including gamification to increase customer interest in increasing savings balances, various discount promos, *vouchers*, *cashback* from collaborating merchants and ease of setting financial transaction limits.

h. Menciptakan produk yang cepat, aman, handal, tanpa biaya tersembunyi, fitur dan promo yang terus berkembang serta memberikan kualitas yang maksimal terhadap pelayanan nasabah. i. Melakukan pengembangan sistem <i>referral</i> dengan kode pemasar untuk mendapatkan <i>reward program</i> pemasaran pembukaan rekening <i>online</i>. j. Bekerjasama dengan <i>partner fintech</i> dan keagenan dan berkolaborasi dengan digital agri sebagai rekening penampungan pinjaman.	h. Creating products that are fast, safe, reliable, without hidden costs, features and promos that continue to grow and provide maximum quality for customer service. i. Developing a referral system with marketer codes to get rewards for online account opening marketing programs. j. Collaborating with fintech partners and agencies and collaborating with digital agri as a loan holding account.

Treasury

Treasury fokus pada pengelolaan, pengembangan dan pembinaan sektor bisnis yang berkaitan dengan produk *Treasury*, transaksi, produk dan jasa *Trade Finance* dan produk jasa lainnya yang menghasilkan *fee based income* dan *interest income* untuk kepentingan Bank.

Treasury focuses on managing, developing and fostering the business sector related to Treasury products, transactions, Trade Finance products and services and other service products that generate fee based income and interest income for the benefit of the Bank.

Fungsi dan Sasaran Treasury

Treasury memiliki fungsi utama untuk mengendalikan likuiditas, solvabilitas pengendalian aset dan *liabilities* secara umum, serta mendukung peningkatan *return on asset* (ROA) dan *return on equity* (ROE) bank. Pelaksanaan fungsi dan pencapaian sasaran yang dimaksud dilakukan dengan mengoptimalkan pendapatan dan biaya dengan risiko yang terukur dan meningkatkan perolehan *fee based income* melalui produk *Treasury* serta mendukung pengembangan produk devisa (*trade finance*). Selain itu juga berfungsi sebagai manajemen investasi, berkontribusi atas pendapatan bunga lainnya serta memastikan terpenuhinya pemenuhan rasio-rasio sesuai dengan besaran yang telah ditetapkan oleh Bank Indonesia dan OJK.

Treasury Functions and Objectives

Treasury has the main function to control liquidity, solvency in controlling assets and liabilities in general, as well as to support the increase in return on assets (ROA) and return on equity (ROE) of banks. The implementation of the function and achievement of the intended target is carried out by optimizing income and costs with measurable risks and increasing the acquisition of fee-based income through Treasury products as well as supporting the development of foreign exchange products (trade finance). In addition, it also functions as investment management, contributes to other interest income and ensures the fulfillment of ratios in accordance with the amount set by Bank Indonesia and FSA.

Produk Treasury

Treasury memiliki Produk dan aktivitas Pemberian fasilitas *credit line* kepada *counterparty* yang sifatnya *committed* maupun *uncommitted* penggunaannya ditujukan untuk produk Treasury sebagai berikut:

1. *Money market line* (*Interbank placement*, *Reverse Repo*);
2. *Foreign exchange line* (*Spot*, *Forward*, *Swap*, dll);
3. *Commercial Line* (semua limit yang terkait transaksi ekspor impor);
4. *Security line/fixed income line* (pembelian surat berharga, obligasi, *Medium Term Note*, *Note issuance facility*, dll);
5. Transaksi derivatif; dan
6. Transaksi *Treasury* lainnya.

Treasury Products

Treasury has products and activities. The provision of credit line facilities to committed and uncommitted counterparties is intended for the following Treasury products:

1. *Money market line* (*Interbank placement*, *Reverse Repo*);
2. *Foreign exchange line* (*Spot*, *Forward*, *Swap*, etc.);
3. *Commercial Line* (all limits related to import-export transactions);
4. *Security line/fixed income line* (purchase of securities, bonds, *Medium Term Note*, *Note issuance facility*, etc.);
5. Derivative transactions; and
6. Other Treasury transactions.

Tantangan yang Dihadapi

Tantangan yang dihadapi *Treasury* di tahun 2021 antara lain sebagai berikut :

1. Pandemi covid-19 menyebabkan seluruh negara melakukan stimulus besar-besaran untuk menjaga perekonomian. Hal ini mengakibatkan mayoritas dari Central Bank Negara Maju melakukan kebijakan QE (*quantitative easing*), namun dampak dari QE sudah terlihat dari peningkatan inflasi yang signifikan.
2. Dampak inflasi yang tidak stabil akan menciptakan ketidakpastian (*uncertainty*) bagi pelaku ekonomi dalam mengambil keputusan yang pada akhirnya akan menurunkan pertumbuhan ekonomi, tingkat inflasi domestik yang lebih tinggi dibanding dengan tingkat inflasi di negara tetangga menjadikan tingkat bunga domestik riil menjadi tidak kompetitif sehingga dapat memberikan tekanan pada nilai rupiah (tetapi tidak halnya yang terjadi di Indonesia dengan tingkat inflasi yang lebih rendah dibandingkan negara tetangga).
3. Tingkat inflasi dan suku bunga berbanding lurus dengan yield obligasi dimana saat suku bunga mengalami kenaikan maka yield obligasi juga akan naik begitu juga sebaliknya saat mengalami penurunan.
4. Pertumbuhan ekonomi dunia maupun di Indonesia tercatat negatif pada kuartal I-2021 disebabkan oleh pandemi covid-19 yang belum usai. Ini adalah sebuah tantangan yang dihadapi oleh *Treasury Bank Raya* dari segi pengelolaan portofolio investasi, karena ketidakpastian ekonomi seperti ini dapat menimbulkan kenaikan imbal hasil obligasi disertai dengan penurunan harga yang dapat mengurangi pendapatan *treasury*.

Strategi *Treasury* Tahun 2021

Untuk mendukung pertumbuhan bisnis Bank, Divisi Keuangan dan *Treasury* berperan aktif dalam menyusun dan memonitoring pencapaian kinerja anggaran, memastikan kecukupan likuiditas dan mengoptimalkan pengelolaan *asset-liability* bank dengan mengutamakan prinsip kehati-hatian dan memenuhi regulasi.

Beberapa strategi yang akan dijalankan adalah sebagai berikut:

1. *Alignment* pengelolaan anggaran keuangan secara aktif dan dinamis untuk mendukung bisnis.
2. Penyesuaian atas *Management Information System* (MIS) sehingga dapat membantu dalam penyajian dari sisi akurasi, tepat waktu dan dapat diolah atau dipergunakan sesuai kebutuhan.
3. Memastikan kecukupan likuiditas dan *Net Open Position* (NOP) memenuhi regulasi.
4. Melakukan diversifikasi pendanaan dari sumber non DPK untuk memperkuat struktur pendanaan dan efisiensi biaya dana.
5. Pengelolaan *asset and liability* secara komprehensif untuk mengoptimalkan *Net Interest Income*, pencapaian target NIM dan meminimalkan risiko.
6. Optimalisasi pengelolaan banking book melalui optimalisasi aset kelolaan *Treasury* dengan tetap memperhatikan eksposur risiko.

Challenges Faced

In 2021, *Treasury* has been facing the following challenges:

1. The COVID-19 outbreak has pushed all governments to enact substantial stimulus measures in order to maintain economic growth. This has led in the majority of Central Bank Negara Maju implementing a QE (*quantitative easing*) approach, despite the fact that the consequence of QE has been a significant jump in inflation.
2. The impact of unstable inflation creates uncertainty for economic actors, so reducing economic growth; a higher domestic inflation rate than neighbouring countries makes the real domestic interest rate uncompetitive, putting downward pressure on the rupiah's value (although this is not the case in Indonesia, where inflation is lower than in neighbouring countries).
3. Bond yields are inversely proportional to inflation and interest rates; as interest rates rise, bond yields fall, and vice versa.
4. In the first quarter of 2021, economic growth in the globe and in Indonesia was negative due to the ongoing COVID-19 outbreak. This is a challenge for *Treasury Bank Raya*'s investment portfolio management, since economic uncertainty may result in an increase in bond rates paired with a decrease in bond values, so limiting *Treasury* income.

Treasury Strategy 2021

To support the Bank's business growth, the Finance and *Treasury* Divisions play an active role in compiling and monitoring the achievement of budget performance, ensuring adequate liquidity and optimising the management of bank assets and liabilities by prioritizing prudential principles and complying with regulations.

Some of the strategies that will be implemented are as follows:

1. Alignment of active and dynamic financial budget management to support business.
2. Adjustment of the Management Information System (MIS) so that it can assist in the presentation in terms of accuracy, on time and can be processed or used as needed.
3. Ensuring adequate liquidity and Net Open Position (NOP) comply with regulations.
4. Diversifying funding from non-Third Fund Parties sources to strengthen the funding structure and cost efficiency of funds.
5. Comprehensive asset and liability management to optimize Net Interest Income, achieve NIM targets and minimize risk.
6. Optimising the management of the banking book through optimizing *Treasury* assets while still taking into account risk exposure.

7. Meningkatkan aktivitas <i>trading book</i> untuk mendukung pertumbuhan bisnis Bank. 8. Aktif berperan serta mendukung upaya Bank Indonesia dalam melakukan pendalaman pasar. 9. Menyusun dan melaksanakan <i>accounting policy</i> secara komprehensif sesuai prinsip-prinsip akuntansi yang berlaku umum serta melakukan <i>review</i> dan perubahan kebijakan akuntansi mengikuti ketentuan yang berlaku sesuai pernyataan standar akuntansi keuangan yang memenuhi prinsip-prinsip akuntansi yang diterima umum. 10. Menyusun kebijakan serta prosedur perpajakan sesuai dengan ketentuan dan peraturan perpajakan yang berlaku, melakukan <i>review</i> kebijakan internal perpajakan mengikuti peraturan perpajakan yang berlaku.	7. Increasing trading book activities to support the Bank's business growth. 8. Actively participating and supporting Bank Indonesia's efforts to deepen the market. 9. Developing and implementing a comprehensive accounting policy in accordance with generally accepted accounting principles as well as review and change accounting policies in accordance with applicable regulations in accordance with statements of financial accounting standards that comply with generally accepted accounting principles. 10. Developing tax policies and procedures in accordance with applicable tax provisions and regulations, review internal taxation policies in accordance with applicable tax regulations.

Tinjauan Keuangan

Financial Overview

Pembahasan tinjauan keuangan berikut berdasarkan Laporan Keuangan Bank untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan telah diaudit oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja dengan opini Wajar Tanpa Pengecualian dan telah disesuaikan dengan Standar Akuntansi Keuangan (SAK) di Indonesia.

The following discussion of the financial review is based on the Bank's Financial Statements for the year ended December 31, 2021 and has been audited by the Public Accounting Firm Purwantono, Sungkoro & Surja with an unqualified opinion and has been adjusted to the Financial Accounting Standards (SAK) in Indonesia.

Laporan Posisi Keuangan

Statement of Financial Position

Aset

Asset

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Aset				
Asset				
Kas Cash	15.239	14.075	1.164	8,27%
Giro pada Bank Indonesia Current Account with Bank Indonesia	557.507	756.178	(198.671)	(26,27%)
Giro pada bank lain - gross Current accounts with other banks - gross	192.795	332.096	(139.301)	(41,95%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(137)	(381)	243	(63,89%)
Penempatan pada Bank Indonesia dan bank lain - gross Placements with Bank Indonesia and other banks - gross	1.374.727	1.516.959	(142.232)	(9,38%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	-	(622)	622	(100,00%)
Efek-efek - gross Effects - gross	3.495.512	3.366.821	128.691	3,82%
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(3.654)	(6.080)	2.425	(39,89%)
Efek-efek yang dibeli dengan janji dijual kembali Securities purchased with agreements to resell	650.378	3.047.732	(2.397.354)	(78,66%)
Tagihan Wesel Ekspor & Tagihan lainnya Export Bills & other Bills	-	23.708	(23.708)	(100,00%)
Tagihan derivatif Derivative bills	-	-	-	-
Kredit yang diberikan - gross Credits granted - gross	11.608.327	19.491.934	(7.883.607)	(40,45%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(1.875.402)	(1.006.365)	(869.037)	86,35%
Tagihan akseptasi Acceptance bill	92.449	-	92.449	100%

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Penyertaan saham Share investment	78	298	(220)	(73,96%)
Aset tetap - neto Fixed assets - net	290.126	277.438	12.688	4,57%
Aset pajak tangguhan Deferred tax assets	371.739	94.379	277.361	293,88%
Agunan yang diambil alih - gross Foreclosed collateral - gross	6.044	8.289	(2.245)	(27,09%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(1.613)	(380)	(1.233)	324,52%
Biaya dibayar dimuka dan aset lain - lain Prepaid expenses and other assets	92.410	99.413	(7.003)	(7,04%)
Total Aset Total Assets	16.866.523	28.015.492	(11.148.969)	(39,80%)

Total Aset Bank Raya per 31 Desember 2021 tercatat sebesar Rp16.866,52 miliar, lebih rendah 39,80% dibandingkan tahun sebelumnya sebesar Rp28.015,49 miliar. Penurunan tersebut utamanya disebabkan kredit yang diberikan yang mengalami penurunan dari Rp19.492 miliar menjadi Rp11.608 miliar atau turun sebesar 40,45% serta penurunan efek-efek yang dibeli dengan janji dijual kembali dari Rp3.048 miliar menjadi Rp650 miliar atau mengalami penurunan sebesar 78,66%.

Aset Produktif

Jumlah Aset Produktif Bank Raya pada akhir tahun 2021 adalah sebesar Rp17.971,70 miliar, lebih rendah 37,02% dibandingkan tahun sebelumnya sebesar Rp28.535,73 miliar. Penurunan Aset Produktif tersebut disebabkan oleh kredit yang diberikan mengalami penurunan dari Rp19.492 miliar menjadi Rp11.608 miliar atau turun sebesar 40,45% serta penurunan efek-efek yang dibeli dengan janji dijual kembali dari Rp3.048 miliar menjadi Rp650 miliar atau mengalami penurunan sebesar 78,66%.

Aset Non Produktif

Jumlah Aset Non Produktif Bank Raya tahun 2021 adalah sebesar Rp775,56 miliar, meningkat dari tahun sebelumnya sebesar Rp493,59 miliar. Peningkatan Aset Non Produktif tersebut disebabkan oleh adanya kenaikan pada pos aset pajak tangguhan dari Rp94,38 miliar menjadi Rp371,74 miliar serta kenaikan pada pos aset tetap dari Rp277,44 miliar menjadi Rp290,13 miliar.

Bank Raya's total assets were IDR 16,866.52 billion as of December 31, 2021, down 39.80% from the previous year's IDR 28,015.49 billion. The decline was mostly due to a reduction in loans provided from IDR 19,492 billion to IDR 11,608 billion, or a 40.45% reduction, as well as a reduction in stocks acquired with resale agreements from IDR 3,048 billion to IDR 650 billion, or a 78.66% reduction.

Earning Assets

Bank Raya's total earning assets were IDR 17,971.70 billion at the end of 2021, down 37.02 % from IDR 28,535.73 billion the previous year. Earning Assets decreased by 40.45 % owing to a fall in loans given from IDR 19,492 billion to IDR 11,608 billion and a decrease in stocks acquired with agreements to resell from IDR 3,048 billion to IDR 650 billion, a decrease of 78.66 %.

Non-Earning Assets

Bank Raya's total non-earning assets was IDR 775.56 billion in 2021, up from IDR 493.59 billion the previous year. Non-earning assets increased as deferred tax assets increased from IDR 94.38 billion to IDR 371.74 billion and fixed assets increased from IDR 277.44 billion to IDR 290.13 billion.

Kas

Cash

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	15.111	13.954	1.157	8,29%
Valas Foreign currency	128	121	7	5,79%
Total Total	15.239	14.075	1.164	8,27%

Jumlah Kas Bank pada akhir periode tahun 2021 tercatat sebesar Rp15,24 miliar, naik 8,27% dari tahun 2020 sebesar Rp14,08 miliar. Kas Bank tahun 2021 utamanya dalam mata uang Rupiah yaitu sebesar Rp15,11 miliar yaitu naik sebesar Rp1,16 miliar atau 8,29%.

Bank Cash was IDR 15.24 billion at the conclusion of the 2021 period, an increase of 8.27% from IDR 14.08 billion in 2020. The Bank's cash balance in 2021 will be mostly in Rupiah, at IDR 15.11 billion, a rise of IDR 1.16 billion or 8.29%.

Giro Pada Bank Indonesia

Current Account with Bank Indonesia

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	517.814	652.418	(134.604)	(20,63%)
Valas Foreign currency	39.693	103.760	(64.067)	(61,75%)
Jumlah Giro Pada Bank Indonesia Total Current Account at Bank Indonesia	557.507	756.178	(198.671)	(26,27%)

Jumlah Giro pada Bank Indonesia tahun 2021 sebesar Rp557,51 miliar, turun sebesar 26,27% dari tahun 2020 sebesar Rp756,18 miliar. Penurunan Giro pada Bank Indonesia tersebut disebabkan oleh rata-rata Dana Pihak Ketiga mengalami penurunan sehingga kewajiban menyimpan dana di Giro pada Bank Indonesia menyesuaikan dengan kewajiban minimal GWM Bank sebesar 0,5% harian dan 3% dari rata-rata DPK Rupiah serta 2% harian dan 2% dari rata-rata DPK Valas.

Current Accounts with Bank Indonesia was IDR 557.51 billion in 2021, down 26.27% from IDR 756.18 billion in 2020. The decrease in Demand Deposits with Bank Indonesia was due to a decrease in average Third Party Funds, which allowed the Bank to adjust the requirement to maintain funds in Demand Deposits with Bank Indonesia to the Bank's minimum statutory reserve requirement of 0.5% daily and 3% of the average DPK Rupiah and 2% daily and 2% of the average foreign exchange deposits.



Giro Pada Bank Lain - Neto

Current Accounts with Other Banks - Net

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah				
Pihak Ketiga Third party				
Pihak Berelasi Related Parties	26.446	14.804	11.642	78,64%
Jumlah Rupiah Amount of Rupiah	26.446	14.804	11.642	78,64%
Valas Foreign currency				
Pihak Ketiga Third party	126.433	295.898	(169.465)	(57,27%)
Pihak Berelasi Related Parties	39.916	21.394	18.523	86,58%
Jumlah Valas Total Forex	166.349	317.291	(150.943)	(47,57%)
Jumlah Giro Pada Bank Lain Amount of Current Accounts with Other Banks	192.795	332.096	(139.301)	(41,95%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(137)	(381)	243	(63,89%)
Jumlah Giro Pada Bank Lain-Neto Total Current Accounts with Other Banks-Net	192.657	331.715	(139.058)	(41,92%)

Bank juga menempatkan Giro pada Bank Lain. Pada akhir tahun 2021, jumlah Giro pada Bank Lain tercatat sebesar Rp192,66 miliar, turun dibandingkan tahun sebelumnya sebesar Rp331,72 miliar.

Additionally, banks establish Current Accounts with other banks. At the end of 2021, the total value of Current Accounts with Other Banks was IDR 192.66 billion, down from IDR 331.72 billion the previous year.

Penempatan Pada Bank Indonesia dan Bank Lain-Gross

Placements with Bank Indonesia and Other Banks-Gross

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah				
Pihak Ketiga Third party	1.374.721	884.688	490.033	55,39%
Pihak Berelasi Related Parties	6	6	-	0,00%

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Jumlah Rupiah Amount of Rupiah	1.374.727	884.694	490.033	55,39%
Valas Foreign currency				
Pihak Ketiga Third party	-	632.266	(632.266)	(100,00%)
Pihak Berelasi Related Parties	-	-		
Jumlah Valas Total Forex	-	632.266	(632.266)	(100,00%)
Jumlah Penempatan Pada Bank Indonesia Dan Bank Lain Number of Placements with Bank Indonesia and Other Banks	1.374.727	1.516.959	(142.232)	(9,38%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	-	(622)	622	(100,00%)
Jumlah Penempatan Pada Bank Indonesia Dan Bank Lain-Neto Number of Placements with Bank Indonesia and Other Banks-Net	1.374.727	1.516.959	(142.232)	(9,38%)

Penempatan pada Bank Indonesia dan Bank Lain neto per 31 Desember 2021 sebesar Rp1.374,73 miliar, turun sebesar Rp142,23 miliar atau 9,38% dari tahun 2020 sebesar Rp1.516,96 miliar.

Net placements with Bank Indonesia and Other Banks was IDR 1,374.73 billion as of December 31, 2021, down IDR 142.23 billion or 9.38% from IDR 1,516.96 billion in 2020.

Efek-Efek Yang Dibeli Dengan Janji Dijual Kembali

Securities Purchased Under the Promise to Resell

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	650.378	3.047.732	2.397.354	78,66%
Valas Foreign currency	-	-		
Jumlah Efek-Efek Yang Dibeli Dengan Janji Dijual Kembali Number of Securities Purchased Under the Agreement to Resell	650.378	3.047.732	2.397.354	78,66%

Efek-efek yang dibeli dengan janji dijual kembali sebesar Rp650,38 miliar, turun senilai Rp2.397,35 miliar atau 78,66% dari tahun 2020 sebesar Rp3.047,73 miliar.

Securities acquired through resale agreements totaled IDR 650.38 billion, down IDR 2,397.35 billion or 78.66% from IDR 3,047.73 billion in 2020.



Tagihan Lainnya

Other Bills

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Tagihan wesel ekspor dan Tagihan Lainnya Export bill of lading and Other Charges	-	23.745	(23.745)	(100,00%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	-	(37)	37	(100,00%)
Jumlah Tagihan Wesel Ekspor dan Tagihan Lainnya - Neto Amount of Export Notes and Other Claims - Net	-	23.708	(23.708)	(100,00%)

Jumlah Tagihan Wesel Ekspor dan Tagihan Lainnya Neto tahun 2021 adalah nihil, turun senilai Rp23,71 miliar atau 100% dari tahun 2020 sebesar Rp23,71 miliar.

Total Notes and Other Claims on Exports In 2021, the net is zero, a loss of IDR 23.71 billion or 100% from the IDR 23.71 billion in 2020.

Tagihan Derivatif

Derivative Bills

Per 31 Desember 2021, Bank Raya tidak memiliki Tagihan Derivatif, sama dengan tahun sebelumnya.

As of December 31, 2021, Bank Raya has no Derivative Receivables, the same as the previous year.

Kredit Yang Diberikan

Credits Granted

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Konsumer Consumer	957.703	1.158.293	(200.590)	(17,32%)
Ritel Retail	3.593.324	4.828.323	(1.234.999)	(25,58%)
Menengah Intermediate	7.057.300	13.505.318	(6.448.018)	(47,74%)
Kredit yang diberikan - bruto Credits granted - gross	11.608.327	19.491.934	(7.883.607)	(40,45%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(1.875.402)	(1.006.365)	(869.037)	86,35%
Total kredit yang diberikan- neto Total credits granted- net	9.732.925	18.485.569	(8.752.644)	(47,35%)

Jumlah Kredit yang Diberikan Bank Raya tahun 2021 adalah sebesar Rp9.732,93 miliar, turun 47,35% dari tahun 2020 sebesar Rp18.485,57 miliar. Penurunan jumlah Kredit yang Diberikan tersebut disebabkan oleh Bank Raya akan melakukan transformasi, sehingga tidak melakukan ekspansi untuk produk eksisting dan fokus untuk pengembangan produk digital.

Bank Raya would disburse IDR 9,732.93 billion in loans in 2021, down 47.35% from IDR 18,485.57 billion in 2020. The drop in loan volume is a result of Bank Raya's restructuring, which will focus on developing digital goods rather than expanding existing offerings.

Tagihan Akseptasi

Jumlah Tagihan Akseptasi Bank Raya tahun 2021 adalah sebesar Rp92,45 miliar, naik dari tahun sebelumnya dimana Bank tidak memiliki Tagihan Akseptasi. Tagihan Akseptasi tahun 2021 adalah sehubungan dengan Surat Kredit Berdokumen Dalam Negeri.

Penyertaan Saham

Jumlah Penyertaan Saham Bank Raya tahun 2021 mengalami penurunan menjadi Rp0,08 miliar, dari tahun sebelumnya Rp0,30 miliar. Penurunan tersebut sehubungan dengan divestasi saham yang dilakukan Bank pada PT BPR Toelongredjo Dasa Nusantara, PT BPR Tjoekir Dasa Nusantara dan PT BPR Toelangan Dasa Nusantara.

Aset Tetap - Neto

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Harga Perolehan Acquisition cost	422.196	404.772	17.424	4,30%
Akumulasi Penyusutan Accumulated depreciation	(132.070)	(127.334)	(4.736)	3,72%
Total Aset Tetap - Neto Total Fixed Assets - Net	290.126	277.438	12.688	4,57%

Jumlah Aset Tetap - Neto Bank Raya tahun 2021 tercatat sebesar Rp290,13 miliar, meningkat sebesar Rp12,69 miliar atau 4,57% dari tahun sebelumnya Rp277,44 miliar.

Aset Pajak Tangguhan

Pada tahun 2021, Aset Pajak Tangguhan Bank Raya tercatat sebesar Rp371,74 miliar, meningkat sebesar Rp277,36 miliar atau 293,88% dari tahun 2020 sebesar Rp94,38 miliar.

Agunan Yang Diambil Alih - Neto

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Harga Perolehan Acquisition cost	6.044	8.289	(2.245)	(27,08%)
Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(1.613)	(380)	(1.233)	324,47%
total Agunan yang diambil alih-neto total Collateral foreclosed-net	4.431	7.909	(3.478)	(43,98%)

Acceptance Bill

Bank Raya's total Acceptance Claims in 2021 was IDR 92.45 billion, an improvement over the previous year, when the Bank lacked Acceptance Receivables. Domestic Documentary Letters of Credit are the subject of Acceptance Bills for 2021.

Share Participation

Total investments in Bank Raya's stock fell to IDR 0.08 billion in 2021, down from IDR 0.30 billion the previous year. The decline was due to the Bank's divestiture of its shares in PT BPR Toelongredjo Dasa Nusantara, PT BPR Tjoekir Dasa Nusantara, and PT BPR Toelangan Dasa Nusantara.

Fixed Assets - Net

Dalam jutaan rupiah/In million rupiah

Total Fixed Assets - Net Bank Raya was IDR 290.13 billion in 2021, up IDR 12.69 billion or 4.57% from IDR 277.44 billion the previous year.

Deferred tax assets

Bank Raya's Deferred Tax Assets totaled IDR 371.74 billion in 2021, up from IDR 94.38 billion in 2020 by IDR 277.36 billion, or 293.88%.

Foreclosed Collateral - Net

Dalam jutaan rupiah/In million rupiah

Agunan Yang Diambil Alih Neto tahun 2021 mencapai Rp4,43 miliar, turun sebesar Rp3,48 miliar atau 43,98% dari tahun 2020 sebesar Rp7,91 miliar.

In 2021, net foreclosed collateral totaled IDR 4.43 billion, down IDR 3.48 billion or 43.98% from IDR 7.91 billion in 2020.

Biaya Dibayar Dimuka dan Aset Lain-Lain

Biaya dibayar dimuka dan aset lain lain pada tahun 2021 sebesar Rp92,41 miliar, turun Rp7,00 miliar atau 7,04% dibanding tahun 2020 senilai Rp99,41 miliar.

Prepaid Expenses and Other Assets

Prepaid expenses and other assets in 2021 amounted to IDR 92.41 billion, decrease IDR 7.00 billion or 7.04% compared to 2020 worth IDR 99.41 billion.

Liabilitas Liability

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Liabilitas Liability				
Liabilitas Segera Immediate Liability	9.926	15.813	(5.887)	(37,23%)
Simpanan Nasabah Customer Deposit	13.496.292	22.995.279	(9.498.987)	(41,31%)
Simpanan Dari Bank Lain Deposits From Other Banks	301.307	213.163	88.144	41,35%
Liabilitas Derivatif Derivative Liabilities	-	-	-	0,00%
Liabilitas Akseptasi Acceptance Liability	92.561	-	92.561	100,00%
Utang Pajak Tax debt	12.652	25.345	(12.693)	(50,08%)
Pinjaman Yang Diterima Loans Received	16.517	17.319	(802)	(4,63%)
Estimasi Kerugian Komitmen & Kontinjensi Estimated Loss of Commitments & Contingencies	28.248	11.079	17.169	154,96%
Surat Berharga Yang Diterbitkan Issued Securities	238.863	238.616	247	0,10%
Liabilitas Diestimasi Atas Imbalan Kerja Estimated Liability for Employee Benefits	60.062	46.375	13.687	29,51%
Liabilitas Lain - Lain Other Liabilities	152.431	164.813	(12.382)	(7,51%)
Total Liabilitas Total Liability	14.408.859	23.727.802	(9.318.943)	(39,27%)

Jumlah Liabilitas Bank Raya per 31 Desember 201 tercatat sebesar Rp14.408,86 miliar, turun sebesar Rp9.318,94 miliar atau 39,27%

Bank Raya's total liabilities as of December 31, 2001 were IDR 14,408.86 billion, down IDR 9,318.94 billion or 39.27% from IDR 23,727.80 billion

dari tahun sebelumnya Rp23.727,80 miliar. Penurunan terbesar jumlah Liabilitas tersebut disebabkan Simpanan Nasabah atau Dana Pihak Ketiga yang mengalami penurunan dalam rangka perubahan strategi perusahaan menjadi transformasi digital, Bank tidak melakukan ekspansi kredit sehingga untuk menyeimbangkan LDR, maka outstanding Simpanan Nasabah diturunkan.

Liabilitas Segera

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	9.916	15.367	(5.451)	(35,47%)
Valas Foreign currency	10	446	(436)	(97,69%)
Jumlah Liabilitas Segera Total Liabilities Immediately	9.926	15.813	(5.887)	(37,23%)

Jumlah Liabilitas Segera Bank Raya pada akhir tahun 2021 sebesar Rp9,93 miliar, meningkat sebesar 37,23% dari tahun 2020 sebesar Rp15,81 miliar. Peningkatan tersebut dikarenakan adanya pencadangan kewajiban rupa rupa umum dan administrasi.

the previous year. Total liabilities declined the most as a result of lower customer deposits or third-party funds in connection with the company's strategic shift to digital transformation; the Bank did not grow credit to balance the LDR; and outstanding client deposits were reduced.

Current Liability

Simpanan Nasabah

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Giro Current Account	2.050.928	3.752.094	(1.701.166)	(45,34%)
Tabungan Savings	3.022.639	1.733.308	1.289.331	74,39%
Deposito Berjangka Time deposit	8.422.726	17.509.877	(9.087.151)	(51,90%)
Jumlah Amount	13.496.292	22.995.279	(9.498.987)	(41,31%)

Jumlah Simpanan Nasabah Bank Raya tahun 2021 tercatat sebesar Rp13.496,29 miliar, turun Rp9.498,99 miliar atau 41,31% dari tahun sebelumnya Rp22.995,28 miliar. Penurunan jumlah Simpanan Nasabah tersebut disebabkan dalam rangka perubahan strategi perusahaan menjadi transformasi digital, Bank tidak melakukan ekspansi kredit sehingga untuk menyeimbangkan LDR, maka *outstanding* Simpanan Nasabah diturunkan terutama Deposito yang merupakan Dana Mahal.

Bank Raya's Immediate Liabilities was IDR 9.93 billion at the end of 2021, up 37.23% from IDR 15.81 billion in 2020. The rise in the provision for general and administrative liabilities was related to the increase in the provision for general and administrative obligations.

Bank Raya's total customer deposits were IDR 13,496.29 billion in 2021, down IDR 9,498.99 billion or 41.31% from IDR 22,995.28 billion the previous year. The decline in customer deposits was a result of the company's strategic shift to digital transformation; the bank did not extend credit to balance the LDR; and outstanding customer deposits, particularly Time Deposits, which were Expensive Funds, were decreased.

Simpanan Dari Bank Lain

Deposits From Other Banks

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	2.005	2.413	(408)	(16,91%)
Valas Foreign currency	299.302	210.750	88.552	42,02%
Jumlah Simpanan dari Bank Lain Total Deposits from Other Banks	301.307	213.163	88.144	41,35%

Pada tahun 2021, Simpanan dari Bank Lain tercatat sebesar Rp301,31 miliar, meningkat 41,35% dibanding tahun 2020 sebesar Rp213,16 miliar. Peningkatan ini disebabkan naiknya Simpanan Valas, Simpanan dari Bank Lain dalam bentuk valas naik sebesar 42,02% menjadi Rp299,30 miliar.

Deposits from Other Banks totaled IDR 301.31 billion in 2021, a 41.35% increase over the IDR 213.16 billion reported in 2020. This growth was facilitated by an increase in Foreign Currency Deposits, which climbed by 42.02% to IDR 299.30 billion.

Liabilitas Derivatif

Derivative Liabilities

Sama seperti tahun 2020, pada tahun 2021 Bank Raya tidak memiliki Liabilitas Derivatif.

Just like in 2020, in 2021 Bank Raya has no Derivative Liabilities.

Liabilitas Akseptasi

Acceptance Liability

Jumlah Liabilitas Akseptasi tahun 2021 tercatat sebesar Rp92,56 miliar, meningkat dari tahun sebelumnya dimana Bank Raya tidak memiliki Liabilitas Akseptasi.

Total Acceptance Liabilities were IDR 92.56 billion in 2021, an increase from the previous year, when Bank Raya lacked Acceptance Liabilities.

Utang Pajak

Tax debt

Pada tahun 2021, jumlah Utang Pajak Bank Raya tercatat sebesar Rp12,65 miliar, turun 50,08% dari tahun 2020 sebesar Rp25,35 miliar.

Bank Raya's total Tax Payables were IDR 12.65 billion in 2021, down 50,08% from IDR 25.35 billion in 2020.

Surat Berharga yang Diterbitkan

Issued Securities

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	238.863	238.616	247	0,10%
Valas Foreign currency	-	-	-	-
Jumlah Surat Berharga Yang Diterbitkan Number of Securities Issued	238.863	238.616	247	0,10%

Jumlah Surat Berharga yang Diterbitkan Bank Raya tahun 2021 tercatat sebesar Rp238,86 miliar, meningkat 0,10% dari tahun sebelumnya Rp238,62 miliar.

Pinjaman yang Diterima

Pada tahun 2021, Bank Raya tidak menerima pinjaman baru dari pihak berelasi, sehingga jumlah Pinjaman yang Diterima mengalami penurunan menjadi Rp16,52 miliar dari tahun sebelumnya sebesar Rp17,32 miliar.

Estimasi Kerugian Komitmen & Kontinjensi

Tahun 2021, jumlah Estimasi Kerugian Komitmen dan Kontinjensi Bank Raya mengalami kenaikan menjadi Rp28,25 miliar dari Rp11,08 miliar di tahun 2020. Kenaikan tersebut dikarenakan adanya peningkatan atas pencadangan kerugian untuk aset liabilitas komitmen kontinjensi sesuai dengan PSAK 71, peningkatan terbesar terdapat pada pos fasilitas kredit yang belum ditarik sebesar 154,96%

Liabilitas Imbalan Kerja

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pemutusan Hubungan Kerja Work termination	54.299	40.831	13.468	32,98%
Cuti Besar Big Leave	4.210	4.736	(526)	(11,09%)
Penghargaan Masa Kerja Service Time Award	738	808	(70)	(8,67%)
Kompensasi PKWT	815	-	815	100,00%
Jumlah Liabilitas Imbalan Kerja Total Employee Benefits Liability	60.062	46.375	13.687	29,51%

Liabilitas Imbalan Kerja Bank Raya pada tahun 2021 tercatat sebesar Rp60,06 miliar, meningkat 29,51% dari tahun 2020 sebesar Rp46,38 miliar.

Liabilitas Lain-Lain

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Rupiah Rupiah	150.883	155.475	(4.592)	(2,95%)
Valas Foreign currency	1.547	9.338	(7.790)	(83,43%)
Jumlah liabilitas lain-lain Amount of other liabilities	152.431	164.813	(12.382)	(7,51%)

Bank Raya issued IDR 238.86 billion in securities in 2021, an increase of 0.10% over the previous year's IDR 238.62 billion.

Loans Received

Bank Raya did not receive new loans from connected parties in 2021, resulting in a decline in total Loans Received to IDR 16.52 billion from IDR 17.32 billion the previous year.

Estimated Loss of Commitments & Contingencies

Bank Raya's Estimated Loss on Commitments and Contingencies grew to IDR 28.25 billion in 2021, up from IDR 11.08 billion in 2020. The rise was caused by an increase in the allowance for loss on assets and liabilities for contingent commitments in line with PSAK 71, with the biggest increase of 154.96% in the post-undrawn credit facility.

Employee Benefits Liability

Dalam jutaan rupiah/In million rupiah

Bank Raya's Employee Benefits Liability was IDR 60.06 billion in 2021, up 29.51% from IDR 46.38 billion in 2020.

Other Liabilities

Dalam jutaan rupiah/In million rupiah

Jumlah Liabilitas Lain-lain Bank Raya tahun 2021 tercatat sebesar Rp152,43 miliar, turun Rp12,38 miliar atau 7,51% dari tahun sebelumnya Rp164,81 miliar. Hal tersebut disebabkan penurunan Bunga yang masih dibayar seiring dengan penurunan Dana Pihak Ketiga.

Bank Raya's total other liabilities were IDR 152.43 billion in 2021, down IDR 12.38 billion or 7.51% from IDR 164.81 billion the previous year. This was owing to a decline in accrued interest, which corresponded to the decline in Third Party Funds.

Ekuitas Equity

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Ekuitas Equity				
Modal saham Capital stock	2.274.653	2.134.329	140.324	6,57%
Tambahan modal disetor Additional paid-in capital	2.943.714	1.827.439	1.116.275	61,08%
Opsi saham Stock options	82	16.774	(16.693)	(99,51%)
Dana setoran modal Capital deposit funds	-	-	-	-
Keuntungan (kerugian) yang belum direalisasi atas efek-efek yang tersedia untuk dijual - setelah pajak tangguhan Unrealized gain (loss) on available-for-sale securities - after deferred tax	54.066	69.501	(15.435)	(22,21%)
Pengukuran kembali program imbalan pasti - setelah pajak tangguhan Remeasurement of defined benefit plans - after deferred tax	(3.603)	3.684	(7.287)	(197,80%)
Cadangan Kerugian Penurunan Nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya-setelah pajak tangguhan Allowance for Impairment Losses on marketable securities at fair value derived from other comprehensive income-net of deferred tax	87	1.596	-	-
Saldo laba Retain earning	-	-	-	-
Telah ditentukan penggunaannya: Predefined usage:				
Cadangan khusus Special suggestions	117	117	-	0,00%
Cadangan umum General reserves	32.254	30.691	1.563	5,09%
Belum ditentukan penggunaannya Use has not been determined	(2.843.706)	203.559	(3.047.264)	(1.496,99%)
Total Ekuitas Total Equity	2.457.663	4.287.690	(1.830.027)	(42,68%)

Jumlah Ekuitas Bank Raya tahun 2021 tercatat sebesar Rp2.457,66 miliar, lebih rendah dari tahun sebelumnya Rp4.287,69 miliar. Penurunan tersebut utamanya disebabkan bank raya membukukan kerugian sebesar Rp2.046 miliar.

The total Equity of Bank Raya in 2021 was recorded at IDR 2,457.66 billion, lower than the previous year of IDR 4,287.69 billion. The decrease was mainly due to Bank Raya reported a Rp2,046 billion loss.

Laporan Laba (Rugi) dan Penghasilan Komprehensif Lainnya Statement of Profit (Loss) and Other Comprehensive Income

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pendapatan Bunga Interest income	1.647.185	1.931.525	(284.340)	(14,72%)
Beban Bunga Interest expense	(773.616)	(1.306.889)	533.273	(40,80%)
Pendapatan Operasional Lainnya Other Operating Income	110.755	71.348	39.407	55,23%
Penyisihan Kerugian Penurunan Nilai Allowance for Impairment Losses	(3.885.062)	(322.513)	(3.562.549)	1.104,62%
Beban Operasional Lainnya Other Operating Expenses	(402.737)	(315.820)	(86.917)	27,52%
Laba Operasional Operational profit	(3.303.476)	57.650	(3.361.126)	(5.830,20%)
Pendapatan Non Operasional - Neto Non Operating Income - Net	345	6.422	(6.077)	(94,63%)
Laba Sebelum Beban Pajak Profit Before Tax Expense	(3.303.131)	64.072	(3.367.203)	(5.255,36%)
Beban Pajak Tax expense	257.430	(32.811)	290.241	(884,58%)
Laba Tahun Berjalan Current year profit	(3.045.701)	31.261	(3.076.962)	(9.842,91%)
Yang Dapat Diatribusikan Kepada: Attributable To:				
Pemilik Entitas Induk Parent Entity Owner	(3.045.701)	31.261	(3.076.962)	(9.842,91%)
Kepentingan Non Pengendali Non-controlling interests				
Penghasilan Komprehensif Lainnya Other Comprehensive Income	(24.231)	85.945	(110.176)	(128,19%)
Total Penghasilan Komprehensif Tahun Berjalan Yang Dapat Diatribusikan Kepada: Total Comprehensive Income for the Year Attributable To:				
Pemilik Entitas Induk Parent Entity Owner	(3.069.933)	117.206	(3.187.139)	(2.719,26%)
Kepentingan Non Pengendali Non-controlling interests				
Laba Tahun Berjalan Per Saham Dasar (Dalam Rupiah Penuh) Basic Earnings for the Year Per Share (In Full Rupiah)	(141,52)	1,46	(143)	(9.793,15%)
Laba Tahun Berjalan Per Saham Dilusian (Dalam Rupiah Penuh) Diluted Earnings for the Year Per Share (In Full Rupiah)	(133,90)	1,46	(135)	(9.271,06%)

Pendapatan Bunga

Tahun 2021, Bank Raya membukukan Pendapatan Bunga sebesar Rp1.647,19 miliar, lebih rendah 14,72% dari tahun sebelumnya sebesar Rp1.931,53 miliar. Komposisi pendapatan bunga Bank Raya masih di dominasi oleh pendapatan bunga kredit yang pada tahun 2021 tercatat sebesar Rp1.375,19 miliar, sedangkan pendapatan bunga penempatan tercatat sebesar Rp271,99 miliar.

Interest income

Bank Raya reported interest income of IDR 1,647.19 billion in 2021, down 14.72% from IDR 1,931.53 billion the previous year. Bank Raya's interest revenue is still dominated by loan interest, which was IDR 1,375.19 billion in 2021, while interest income from placements totaled IDR 271.99 billion.

Pendapatan Bunga Kredit

Loan Interest Income

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Kredit Menengah Medium Credit	857.854	1.064.528	(206.674)	(19,41%)
Kredit Ritel Medium Credit	398.219	422.239	(24.020)	(5,69%)
Kredit Konsumer Consumer Credit	119.117	134.034	(14.917)	(11,13%)
Pendapatan Bunga Kredit Credit Interest Income	1.375.191	1.620.801	(245.610)	(15,15%)

Seiring dengan penurunan jumlah kredit yang diberikan Bank di tahun 2021, pendapatan bunga kredit juga turun menjadi sebesar Rp1.375,19 miliar dari Rp1.620,80 miliar di tahun 2020. Pendapatan bunga kredit utamanya masih berasal dari kredit menengah yang di tahun 2021 tercatat sebesar Rp857,85 miliar.

Along with the decline in loan volume in 2021, loan interest income declined to IDR 1,375.19 billion from IDR 1,620.80 billion in 2020. The majority of loan interest revenue came from medium loans, which totaled IDR 857.85 billion in 2021.

Pendapatan Bunga Penempatan

Placement Interest Income

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Penempatan Pada Bank Indonesia dan Bank Lain Placements with Bank Indonesia and Other Banks	28.883	37.626	(8.743)	(23,24%)
Efek-efek Effects	206.464	207.810	(1.346)	(0,65%)
Efek yang Dibeli Dengan Janji Dijual Kembali Securities Purchased With Promise To Resell	36.647	65.288	(28.641)	(43,87%)
Total Pendapatan Bunga Penempatan Total Placement Interest Income	271.994	310.724	(38.730)	(12,46%)

Pendapatan bunga dari penempatan dana pada tahun 2021 sebesar Rp271,99 miliar, turun 12,46% dari tahun 2020 sebesar Rp310,72 miliar. Penurunan terbesar pada Pendapatan efek yang dibeli dengan janji dijual kembali yang disebabkan Bank Indonesia menetapkan suku bunga Reverse Repo lebih kecil dibandingkan tahun lalu.

Interest revenue from fund placements were IDR 271.99 billion in 2021, down 12.46% from IDR 310.72 billion in 2020. The greatest decline in the revenue from assets acquired through resale agreements was caused by Bank Indonesia's decision to cut the Reverse Repo interest rate from last year's level.

Beban Bunga

Interest expense

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Beban Bunga DPK Deposit Interest Expense	707.598	1.228.641	(521.043)	(42,41%)
Beban Bunga Dana Lainnya Other Fund Interest Expense	66.018	78.248	(12.230)	(15,63%)
Total Beban Bunga Total Interest Expense	773.616	1.306.889	(533.273)	(40,80%)

Jumlah Beban Bunga Bank Raya tahun 2021 mengalami penurunan sebesar 40,80% menjadi Rp773,62 miliar, dari Rp1.306,89 miliar di tahun 2020. Penurunan Beban Bunga tersebut terutama disebabkan oleh Penurunan beban bunga Deposito yang tercermin pada penurunan Rasio Biaya Dana dari 5,97% menjadi 4,08%.

Bank Raya's overall interest expense was IDR 773.62 billion in 2021, down 40.80% from IDR 1,306.89 billion in 2020. Interest Expense decreased primarily as a result of lower interest expense on deposits, as indicated by the drop in the Cost of Funds Ratio from 5.97% to 4.08%.

Pendapatan Operasional Lainnya

Other Operating Income

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Keuntungan dari penjualan efek-efek neto Total Interest Expense	33.943	35.556	(1.613)	(4,54%)
Provisi dan Komisi Lainnya Other Fees and Commissions	21.580	17.978	3.602	20,04%
Keuntungan yang belum direalisasi dari perubahan nilai wajar efek-efek Unrealized gain from changes in fair value of securities	644	6.679	(6.035)	(90,36%)
Penerimaan kembali aset yang telah dihapusbukukan Recoveries of written-off assets	51.820	10.275	41.545	404,33%
Keuntungan transaksi mata uang asing Advantages of foreign currency transactions	1.704	-	1.704	100,00%
Jasa Administrasi Administration Services	-	-	-	-
Lain-lain Etc	1.063	860	203	23,57%
Total Pendapatan Operasional Lainnya Total Other Operating Income	110.755	71.348	39.407	55,23%

Tahun 2021 Bank Raya membukukan Pendapatan Operasional Lainnya sebesar Rp110,76 miliar, meningkat 55,23% dari tahun sebelumnya Rp71,35 miliar. Peningkatan tersebut disebabkan adanya kenaikan penerimaan kembali aset yang telah dihapusbukukan sebesar Rp51,82 miliar.

In 2021, Bank Raya posted Other Operating Income of IDR 110.76 billion, an increase 55.23% from the previous year of IDR 71.35 billion. is due to an increase in the recoveries of written-off assets of IDR 51.82 billion

Penyisihan Kerugian Penurunan Nilai

Tahun 2021 Bank Raya membentuk Cadangan Kerugian Penurunan Nilai (CKPN) sebesar Rp3.885,06 miliar, jumlah tersebut meningkat dibandingkan tahun 2020 sebesar Rp322,51 miliar. Peningkatan tersebut disebabkan sebagai langkah strategis untuk melakukan transformasi digital dalam perubahan portofolio aset, terutama untuk kredit konvensional eksisting yang berkualitas rendah.

Allowance for Impairment Losses

In 2021 Bank Raya established an Allowance for Impairment Losses (CKPN) of IDR 3.885.06 billion, this amount increased compared to 2020 which was IDR 322.51 billion. The increase was caused as a strategic step to carry out digital transformation in changing asset portfolios, especially for existing low quality conventional loans.

Beban Operasional Lainnya

Other Operating Expenses

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Beban Gaji dan Tunjangan Salaries and Benefits	235.184	197.468	37.716	19.10%
Beban Umum dan Administrasi General and Administrative Expenses	165.576	115.346	50.230	43,55%
Beban Kerugian yang belum direalisasikan dari perubahan nilai wajar efek-efek Expense Unrealized losses from changes in the fair value of securities	-	-	-	-
Kerugian transaksi mata uang asing - nett Loss of foreign currency transactions - nett	-	1.470	(1.470)	(100,00%)
Lain-lain Etc	1.977	1.535	422	28,79%
Total Beban Operasional Lainnya Total Other Operating Expenses	402.737	315.820	86.917	27,52%

Jumlah Beban Operasional Lainnya tahun 2021 tercatat sebesar Rp402,74 miliar, meningkat 27,52% dibandingkan tahun sebelumnya Rp315,82 miliar.

Total Other Operating Expenses in 2021 was recorded at IDR 402.74 billion, an increase 27.52% compared to the previous year of IDR 315.82 billion.

Beban Operasional Lainnya Bank Raya utamanya berupa Beban Gaji dan Tunjangan yang pada tahun 2021 tercatat sebesar Rp235,18 miliar, meningkat 19,10% dari tahun sebelumnya sebesar Rp197,47 miliar. Peningkatan ini disebabkan adanya penambahan SDM dalam rangka transformasi digital. Selain itu, Beban Umum dan Administrasi juga mengalami peningkatan menjadi Rp165,58 miliar dari Rp115,35 miliar di tahun 2020.

Bank Raya's Other Operating Expenses are mainly in the form of Salaries and Allowances which in 2021 were recorded at IDR 235.18 billion, an increase of 19.10% from the previous year of IDR 197.47 billion. This increase was due to the addition of human resources in the context of digital transformation. In addition, General and Administrative Expenses also increased to IDR 165.58 billion from IDR 115.35 billion in 2020.

Pendapatan (Beban) Non Operasional - Neto

Non-Operating Income (Expenses) - Net

Tahun 2021 Bank Raya membukukan Pendapatan Non Operasional neto sebesar Rp0,35 miliar. Jumlah tersebut mengalami penurunan dibandingkan tahun sebelumnya dimana Bank membukukan Pendapatan Non Operasional - neto sebesar Rp6,42 miliar.

In 2021, Bank Raya recorded Non-Operational Income-net of IDR 0.35 billion. This amount decreased compared to the previous year where the Bank recorded Non-Operational Income - net of IDR 6.42 billion.

Laba Sebelum Beban Pajak

Tahun 2021 Bank Raya membukukan Rugi Sebelum Pajak sebesar Rp3.303,13 miliar. Jumlah tersebut mengalami penurunan dari tahun sebelumnya dimana Bank Raya membukukan Laba Sebelum Pajak sebesar Rp64,07 miliar.

Beban Pajak

Profit Before Tax Expense

Bank Raya posted a loss before tax of IDR 3,303.13 billion in 2021. This is a reduction from the previous year, when Bank Raya earned IDR 64.07 billion in Profit Before Tax.

Tax expense

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Pajak Badan Corporate Tax	13.522	16.435	(2.913)	(17,72%)
Pajak Tangguhan Deferred Tax	(270.952)	16.376	(287.328)	(1.754,57%)
Kekurangan Pembayaran Pajak Tahun Sebelumnya Underpayment of Previous Year's Taxes	-	-	-	-
Total Beban (pendapatan) Pajak Total Expense (income) Tax	(257.430)	32.811	(290.241)	(884,58%)

Sejalan dengan kerugian yang dialami Bank, tahun 2021 Bank memperoleh manfaat pajak sebesar Rp257,43 miliar.

In line with the losses suffered by the Bank, in 2021 the Bank will receive a tax benefit of IDR 257.43 billion.

Laba Tahun Berjalan

Tahun 2021 Bank membukukan rugi Tahun Berjalan sebesar Rp3.045,70 miliar. Pencapaian tersebut mengalami penurunan dibandingkan tahun 2020 dimana Bank membukukan Laba Tahun berjalan sebesar Rp31,26 miliar.

Current year profit

In 2021 the Bank posted a loss for the Year of IDR 3,045.70 billion. This achievement decreased compared to 2020 where the Bank recorded a Profit for the Year of IDR 31.26 billion.

Laba Per Saham

Tahun 2021, Laba per saham bank raya sebesar minus Rp141,52 menurun dari tahun 2020 sebesar Rp1,46

Earnings Per Share

Bank Raya's profits per share would be negative IDR 141.52 in 2021, a fall of IDR 1.46 from 2020.

Penghasilan Komprehensif Lainnya

Tahun 2021 membukukan Penghasilan Komprehensif lainnya sebesar minus Rp24,23 miliar. Pencapaian tersebut mengalami penurunan dibandingkan tahun 2020 dimana bank membukukan Penghasilan Komprehensif lainnya sebesar Rp85,95 miliar.

Other Comprehensive Income

In 2021, it reported a loss of IDR 24.23 billion in other comprehensive income. This result was lower than in 2020, when the Bank earned IDR 85.95 billion in other comprehensive income.

Laporan Arus Kas Konsolidasian

Consolidated Statements of Cash Flows

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020	Pertumbuhan/Penurunan Increase/Decrease	
			Rp	%
Arus Kas Dari Aktivitas Operasi Cash Flow From Operating Activities	(1.139.643)	763.032	(1.902.675)	(249,36%)
Arus Kas Dari Aktivitas Investasi Cash Flow From Investing Activities	(578.146)	(271.034)	(307.112)	113,31%
Arus Kas Dari Aktivitas Pendanaan Cash Flow From Funding Activities	1.238.749	(243.681)	1.482.430	(608,35%)
Kenaikan (Penurunan) Neto Kas Dan Setara Kas Net Increase (Decrease) in Cash And Cash Equivalents	(479.041)	248.317	(727.358)	(292,92%)
Kas Dan Setara Kas Awal Tahun Early Year Cash And Cash Equivalents	2.619.308	2.370.991	248.317	10,47%
Kas Dan Setara Kas Akhir Tahun Year End Cash And Cash Equivalents	2.140.267	2.619.308	(479.041)	(18,29%)

Arus Kas Dari Aktivitas Operasi

Pada tahun 2021, arus kas bersih dari aktivitas operasi tercatat sebesar negatif Rp1.139,64 miliar. Sementara pada tahun 2020 sebesar Rp763,03 miliar. Penurunan arus kas dari aktivitas operasi disebabkan penurunan Dana Simpanan.

Cash Flow From Operating Activities

In 2021, net cash flow from operating activities was recorded at negative IDR 1,139.64 billion. While in 2020 it was IDR 763.03 billion. The decrease in cash flow from operating activities was due to a decrease in deposit funds.

Arus Kas Dari Aktivitas Investasi

Pada tahun 2021, arus kas bersih yang digunakan untuk aktivitas investasi sebesar negatif Rp578,15 miliar. Kenaikan ini dikarenakan adanya kenaikan penempatan pada efek-efek yang tersedia untuk dijual dan efek-efek yang dimiliki hingga jatuh tempo dari Rp258,55 miliar pada tahun 2020 menjadi Rp539,84 miliar di tahun 2021.

Cash Flow From Investing Activities

In 2021, net cash flow used for investing activities was negative IDR 578.15 billion. This increase was due to an increase was due to an increase in placements in available for sale and held to maturity securities from IDR 258.55 billion in 2020 to IDR 539.84 billion in 2021.

Arus Kas Dari Aktivitas Pendanaan

Arus kas bersih dari aktivitas pendanaan pada tahun 2021 sebesar Rp1.238,75 miliar, sedangkan di tahun 2020 sebesar negatif Rp243,68 miliar. Kenaikan ini dikarenakan adanya penambahan agio saham.

Cash Flow From Funding Activities

Net cash flow from financing activities in 2021 was IDR 1,238.75 billion, while in 2020 it was negative IDR 243.68 billion. This increase was due to the addition of agio shares.

Tingkat Kesehatan Bank Bank's Risk-Based Rating

Dalam melakukan penilaian atas tingkat kesehatan Bank, Bank Raya dengan berpedoman pada Peraturan OJK No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum menggunakan pendekatan risiko. Pengukuran tingkat kesehatan Bank dilakukan berdasarkan risiko dan kinerja Bank, yang dijabarkan dalam 4 (empat) faktor, yaitu: profil risiko, tata kelola perusahaan, rentabilitas, dan permodalan.

Pada tahun 2021, Bank Raya mendapatkan Peringkat 2 dari sisi tingkat kesehatan. Peringkat ini menunjukkan bahwa kondisi Bank secara umum sehat dan mampu melanjutkan bisnisnya di tengah berbagai pengaruh negatif yang signifikan akibat perubahan kondisi bisnis dan faktor eksternal lainnya.

In assessing the soundness of the Bank, Bank Raya based on OJK Regulation No. 4/POJK.03/2016 concerning Assessment of the Soundness of Commercial Banks using a risk approach. The measurement of the Bank's soundness level is carried out based on the risk and performance of the Bank, which is described in 4 (four) factors, namely: risk profile, corporate governance, profitability, and capital.

In 2021, Bank Raya will get a rating of 2 in terms of health level. This rating indicates that the Bank's condition is generally healthy and able to continue its business in the midst of various significant negative effects due to changes in business conditions and other external factors.

Komitmen dan Kontijensi Commitments and Contingencies

	31 Desember 2021/ December 31, 2021	31 Desember 2020/ December 31, 2020	
Komitmen			Commitment
Tagihan komitmen			Commitment Charges
Rupiah			Rupiah
Pembelian mata uang asing	-	-	Purchase of foreign currencies
Dolar Amerika Serikat			United States Dollar
Pembelian mata uang asing	-	-	Purchase of foreign currencies
	-	-	
Liabilitas komitmen			Commitment Liability
Rupiah			Rupiah
Fasilitas kredit yang belum ditarik	522,416	903,225	Unused loan facilities
Garansi yang diterbitkan	-	-	Guarantee issued
L/C yang tidak dapat dibatalkan yang masih	-	-	Irrevocable L/C berjalan dalam rangka impor
	522,416	903,225	
Dolar Amerika Serikat			United States Dollar
Fasilitas kredit yang belum ditarik	63,948	39,464	Unused loan facilities
Garansi yang diterbitkan	-	-	Guarantee issued
L/C yang tidak dapat dibatalkan yang masih	2,049	14,329	Irrevocable L/C berjalan dalam rangka impor
	65,997	53,793	
Komitmen - neto	588,413	957,018	Commitment - neto
Liabilitas kontinjensi			Contingencies Liability
Rupiah			Rupiah
Garansi yang diterbitkan	5,822	57,479	Guarantee issued
Dolar Amerika Serikat			United States Dollar
Garansi yang diterbitkan	-	1,102	Guarantee issued
Kontinjensi - neto	5,822	58,581	Contingencies - net
KOMITMEN DAN KONTINJENSI - NETO	594,235	1,015,599	COMMITMENT AND CONTINGENCIES - NETO

Dampak Perubahan Tingkat Suku Bunga Terhadap Kinerja Bank

Impact of Changes in Interest Rate on Bank Performance

Pada tahun 2021, Bank Indonesia tercatat 1(satu) kali menurunkan suku bunga acuan BI 7 Days Reverse Repo Rate sebesar 25 basis poin (bps) dari 3,75% menjadi 3,50% pada 18 Februari 2021. Atas kebijakan tersebut, Bank Raya tidak langsung dapat menurunkan suku bunga pinjaman. Dikarenakan pada Tahun 2021, Bank masih berupaya untuk bertahan dari dampak pandemi. Meskipun demikian, Bank telah melakukan penyesuaian terhadap suku bunga simpanan.

In 2021, Bank Indonesia recorded 1(one) reduction in the BI 7 Days Reverse Repo Rate by 25 basis points (bps) from 3.75% to 3.50% on 18 February 2021. Bank Raya might cut loan interest rates indirectly as a result of this policy. Due in 2021, the Bank is still attempting to withstand the pandemic's consequences. The Bank has, however, adjusted the deposit interest rate.

Rasio Keuangan Utama

Main Financial Ratio

Uraian Description	2021	2020
KPMM (risiko kredit, pasar dan operasional) CAR (credit, market and operational risk)	20,24	24,33
Rasio Aset Produktif bermasalah dan aset non produktif bermasalah terhadap Total Aset Produktif dan aset non produktif Ratio of non-performing Earning Assets and Non-Earning Assets to Total Earning Assets and Non-Earning Assets	2,78	3,55
Rasio Aset Produktif bermasalah terhadap Total Aset Produktif Ratio of Non-performing Earning Assets to Total Earning Assets	2,88	3,69
Kredit Bermasalah (NPL) - kotor Non-performing Credit (NPL) - gross	3,98	4,97
Kredit Bermasalah (NPL) - bersih Non-performing Loans (NPL) - net	0,04	2,73
Imbal Hasil Aset (ROA) Return on Assets (ROA)	(14,75)	0,24
Imbal Hasil Ekuitas (ROE) Return on Equity (ROE)	(95,44)	0,75
Marjin Bunga Bersih (NIM) Net Interest Margin (NIM)	3,87	2,4
Beban Operasional/Pendapatan Operasional Operating Expenses/Operating Income	287,86	97,12
Kredit/Dana Pihak Ketiga (DPK) Credit/Third Party Funds (TPF)	86,01	84,76
Biaya Dana Fund Fee	4,08	5,97
Tingkat Suku Bunga Penyediaan Dana Funding Interest Rate	7,51	8,34
Rasio CKPN Keuangan terhadap Aset Produktif Financial CKPN Ratio to Earning Assets	11,72	3,86

Kemampuan Membayar Utang Ability To Pay Debt

Kemampuan Bank dalam memenuhi seluruh kewajiban baik kewajiban jangka panjang maupun jangka pendek, diukur melalui beberapa rasio, antara lain rasio likuiditas, rasio solvabilitas, dan rasio rentabilitas. Kemampuan membayar utang juga tercermin dari telah ikutnya Bank sebagai peserta program penjaminan pada Lembaga Penjaminan Simpanan.

Kemampuan Membayar Hutang Jangka Pendek

Kemampuan Bank dalam membayar utang jangka pendek dapat dilihat dari rasio likuiditas. Rasio likuiditas Bank dapat diukur melalui rasio kredit terhadap dana pihak ketiga (LDR). Pada tahun 2021, LDR Bank Raya sebesar 86,01%, meningkat dibanding tahun 2020 sebesar 84,76%. Namun demikian, LDR Bank Raya tahun 2021 masih berada di kisaran target LDR yang ditetapkan sesuai regulasi PBI No.17/11/PBI/2015 serta masih berada pada level yang optimal untuk pengelolaan likuiditas dan menjaga efisiensi biaya dana.

Kemampuan Membayar Hutang Jangka Panjang

Kemampuan solvabilitas dapat diukur melalui rasio permodalan bank. Bank Raya memastikan kecukupan modal Bank untuk dapat memenuhi risiko kredit, risiko pasar dan risiko operasional yang tercermin dari Rasio Kecukupan Modal *Capital Adequacy Ratio* (CAR). CAR adalah rasio modal terhadap aset tertimbang menurut risiko *Risk-Weighted Assets* (RWA). Pada tahun 2021, CAR Bank Raya mencapai 20,24%, lebih rendah dari tahun sebelumnya sebesar 24,33%. Rasio tersebut menunjukkan solvabilitas Bank Bank Raya masih baik karena telah melebihi minimal *requirement* rasio CAR dari regulator sehingga dapat memenuhi risiko kredit, risiko pasar, dan risiko operasional.

Berdasarkan Peraturan OJK No.11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum, Bank wajib menyediakan modal minimum sesuai dengan profil risiko. Rasio Kecukupan Modal minimum yang ditetapkan OJK adalah sebesar 9% - 10%. Dengan rasio kecukupan Bank berada pada tingkat 20,24%, struktur permodalan Bank memiliki kapabilitas untuk mengimbangi risiko pasar, risiko kredit dan risiko operasional dimana rasio tersebut lebih tinggi dari rasio kecukupan minimum dan struktur modal Bank sudah memenuhi Peraturan OJK. Hal ini berarti bahwa Bank Raya telah mengelola dengan baik modal Bank dan memiliki kecukupan modal untuk membayar utang.

Selain itu, Bank wajib membentuk tambahan modal sebagai penyangga (*buffer*) sesuai profil risiko. Tambahan modal tersebut dapat berupa:

1. *Capital Conservation Buffer*, yang berfungsi sebagai penyangga (*buffer*) apabila terjadi kerugian pada periode krisis.

The Bank's ability to meet all obligations, both long-term and short-term, is measured through several ratios, including liquidity ratios, solvency ratios, and profitability ratios. The ability to pay debts is also reflected in the participation of the Bank as a participant in the guarantee program at the Deposit Insurance Corporation.

Ability to Pay Short Term Debt

The Bank's ability to pay short-term debt can be seen from the liquidity ratio. The Bank's liquidity ratio can be measured through the ratio of credit to third party funds (LDR). In 2021, Bank Raya's LDR is 86.01 %, an increase compared to 2020 of 84.76%. However, Bank Raya's LDR in 2021 is still within the LDR target range set in accordance with PBI regulation No.17/11/PBI/2015 and is still at an optimal level for liquidity management and maintaining cost efficiency of funds.

Ability to Pay Long-Term Debt

Solvency ability can be measured through the bank's capital ratio. Bank Raya ensures the Bank's capital adequacy to meet credit risk, market risk and operational risk as reflected in the Capital Adequacy Ratio (CAR). CAR is a risk-weighted ratio of capital to assets according to Risk-Weighted Assets (RWA). In 2021, Bank Raya's CAR will reach 20.24%, an lower than the previous year of 24.33%. This ratio shows that Bank Raya's solvency is still good because it has exceeded the minimum CAR ratio requirement from the regulator so that it can meet credit risk, market risk, and operational risk.

Based on OJK Regulation No.11/POJK.03/2016 concerning Minimum Capital Adequacy Requirement, Banks are required to provide minimum capital according to their risk profile. The minimum Capital Adequacy Ratio set by OJK is 9% - 10%. With the Bank's adequacy ratio at the level of 20.24%, the Bank's capital structure has the capability to offset market risk, credit risk and operational risk where the ratio is higher than the minimum adequacy ratio and the Bank's capital structure has complied with OJK Regulations. This means that Bank Raya has managed the Bank's capital well and has sufficient capital to pay its debts.

In addition, the BANK is required to establish additional capital as a buffer according to the risk profile. The additional capital can be in the form of:

1. *Capital Conservation Buffer*, which functions as a buffer in the event of a loss during a crisis period.

2. *Countercyclical Buffer*, yang berfungsi sebagai penyangga (*buffer*) untuk mengantisipasi kerugian apabila terjadi pertumbuhan kredit perbankan yang berlebihan sehingga berpotensi mengganggu stabilitas sistem keuangan.
3. *Capital Surcharge* untuk *Domestic Systemically Important Bank* (D-SIB), yang berfungsi untuk mengurangi dampak negatif terhadap stabilitas sistem keuangan dan perekonomian apabila terjadi kegagalan Bank yang berdampak sistemik melalui peningkatan kemampuan Bank dalam menyerap kerugian.

Kemampuan Membayar Utang dari Obligasi yang Diterbitkan

Parameter lain dari kemampuan membayar utang adalah berdasarkan peringkat dari efek-efek yang diterbitkan Bank Raya yaitu Obligasi. Efek-efek yang diterbitkan secara rutin dinilai oleh lembaga pemeringkatan guna mendukung kelayakan efek. Kualitas efek sangat ditentukan oleh kemampuan perusahaan penerbit efek dalam membayar efek nya pada saat jatuh tempo dan kemampuannya membayar bunga atau kupon selama jangka waktu penerbitan efek tersebut. Obligasi diterbitkan dicatatkan di Bursa Efek Indonesia, Bank Raya menggunakan Pefindo sebagai lembaga pemeringkat.

2. *Countercyclical Buffer*, which functions as a buffer to anticipate losses in the event of excessive bank credit growth that has the potential to disrupt financial system stability.
3. *Capital Surcharge* for *Domestic Systemically Important Banks* (D-SIB), which functions to reduce the negative impact on financial system stability and the economy in the event of a Bank failure that has a systemic impact through increasing the Bank's ability to absorb losses.

Ability to Pay Debt from Issued Bonds

Another parameter of the ability to pay debts is based on the rating of the securities issued by Bank Raya, namely bonds. Securities issued are routinely assessed by rating agencies to support the suitability of securities. The quality of securities is largely determined by the ability of the issuing company to pay its securities at maturity and their ability to pay interest or coupons during the period of issuance of the securities. Bonds issued are listed on the Indonesia Stock Exchange, Bank Raya uses Pefindo as a rating agency.

Nama Efek Effect Name	Peringkat Efek Effect Rating	
	2021	2020
Obligasi I Seri B Bonds I Series B	id AA oleh Pefindo id AA by Pefindo	id AA oleh Pefindo id AA by Pefindo

Kolektibilitas Piutang Receivables Collectibility

Kolektibilitas Kredit Bank terlihat dari total kredit bermasalah (*Non Performing Loan - NPL*). Pada 31 Desember 2021 dan 2020, Rasio kredit bermasalah (*Non Performing Loan - NPL*) Bruto masing-masing sebesar 3,98% dan 4,97%. Rasio NPL *netto* masing-masing sebesar 0,04% dan 2,73%. Bank Raya senantiasa melakukan pemantauan secara aktif terhadap perkembangan kualitas piutang, khususnya kredit yang telah disalurkan.

The Bank's credit collectibility can be seen from the total non-performing loans (NPL). As of December 31, 2021 and 2020, the Gross Non-Performing Loan (NPL) ratio is 3.98% and 4.97%. The net NPL ratio is 0.04% and 2.73%, respectively. Bank Raya continues to actively monitor the development of the quality of receivables, especially loans that have been disbursed.

Uraian Description	2021	2020
Total Kredit yang Diberikan (Rp Juta) Total Loans Disbursed (IDR Million)	11.608.327	19.491.934
Total Kredit Bermasalah (Rp Juta) Total Non-performing Loans (IDR Million)	461.598	968.070
% Kredit Bermasalah - Kotor % Non-performing Loans - Gross	3,98%	4,97%
% Kredit Bermasalah - Bersih % Non-performing Loans - Net	0,04%	2,73%

Struktur Modal Dan Kebijakan Struktur Modal Capital Structure and Capital Structure Policy

Kebijakan Manajemen Atas Struktur Permodalan

Kebijakan pengelolaan modal bertujuan untuk memastikan bahwa Bank memiliki modal yang kuat untuk mendukung strategi pengembangan ekspansi usaha saat ini dan mempertahankan kelangsungan pengembangan di masa mendatang. Selain itu, juga bertujuan untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator jasa keuangan dan Bank Indonesia serta memastikan agar struktur permodalan Bank telah efisien.

Dalam pengelolaan permodalan, Bank mempertimbangkan faktor-faktor seperti: pengembalian modal yang optimal pada pemegang saham dan menjaga keseimbangan antara keuntungan yang lebih tinggi dan keamanan yang diberikan oleh posisi modal yang sehat.

Bank menyusun Rencana Permodalan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan dan mengkombinasikannya dengan tinjauan perkembangan ekonomi terkini.

Permodalan Bank Raya disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Hal ini untuk memastikan usaha bank dapat berkelanjutan dengan dukungan permodalan yang memadai.

Rincian Struktur Modal

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dan Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tentang perubahan dari POJK No. 11/POJK.03/2016, Bank wajib menyediakan modal minimum sesuai dengan profil risiko. Penyediaan modal minimum Bank berdasarkan profil risiko yang berlaku saat ini adalah 9% sampai dengan kurang dari 10% dari Aset Tertimbang Menurut Risiko (ATMR). Selain kebutuhan untuk memenuhi modal minimum berdasarkan profil risiko, Bank juga berkewajiban untuk menyediakan tambahan modal penyangga (*buffer*) dengan rincian sebagai berikut: (i) *Capital Conservation Buffer*, (ii) *Countercyclical Buffer*, dan (iii) *Capital Surcharge* untuk *Domestic Systemically Important Bank* (D-SIB).

Pada tahun 2021, tambahan modal penyangga yang berlaku bagi Bank adalah *Capital Conservation Buffer* sebesar 0%, *Countercyclical Buffer* sebesar 0% dan *Capital Surcharge* untuk D-SIB sebesar 0%. Persyaratan *Capital Conservation Buffer* akan terus ditingkatkan setiap tahunnya hingga mencapai ketentuan minimum sebesar 2,5%, sedangkan persyaratan *Countercyclical buffer* dan *Capital Surcharge* untuk D-SIB akan direview oleh regulator sebanyak dua kali setiap tahunnya. Seluruh kewajiban modal penyangga harus dipenuhi dengan *Common Equity Tier 1* (CET 1).

Management Policy on Capital Structure

The capital management policy aims to ensure that the Bank has strong capital to support the current business expansion development strategy and maintain sustainable development in the future. In addition, it also aims to meet the capital adequacy requirements set by the financial services regulator and Bank Indonesia and ensure that the Bank's capital structure is efficient.

In managing capital, the Bank considers factors such as: optimal return on capital to shareholders and maintaining a balance between higher returns and the security provided by a healthy capital position.

The Bank prepares a Capital Plan based on an assessment of the review of the required capital adequacy requirements and combines it with a review of the latest economic developments.

Bank Raya capital is prepared by the Board of Directors as part of the Bank's Business Plan and approved by the Board of Commissioners. This is to ensure that the bank's business can be sustainable with adequate capital support.

Capital Structure Details

Based on the Financial Services Authority Regulation No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks and Financial Services Authority Regulation No. 34/POJK.03/2016 regarding changes from POJK No. 11/POJK.03/2016, Banks are required to provide a minimum capital in accordance with the risk profile. The Bank's minimum capital provision based on the current risk profile is 9% to less than 10% of Risk Weighted Assets (RWA). In addition to the need to meet the minimum capital based on the risk profile, the Bank is also obliged to provide additional buffer capital with the following details: (i) *Capital Conservation Buffer*, (ii) *Countercyclical Buffer*, and (iii) *Capital Surcharge* for *Domestic Systemically Important Banks* (D-SIB).

In 2021, additional capital buffers that apply to the Bank are *Capital Conservation Buffer* of 0%, *Countercyclical Buffer* of 0% and *Capital Surcharge* for D-SIB of 0%. The *Capital Conservation Buffer* requirements will continue to be increased every year until they reach the minimum requirement of 2.5%, while the *Countercyclical buffer* and *Capital Surcharge* requirements for D-SIB will be reviewed by the regulator twice a year. All buffer capital obligations must be met with *Common Equity Tier 1* (CET 1).

Per 31 Desember 2021, posisi *Capital Adequacy Ratio* (CAR) untuk bank saja berada pada tingkat 20,24%, berada di atas ketentuan modal minimum termasuk di dalamnya tambahan kewajiban modal penyangga. Selain itu, Tier 1 rasio (pada saat ini sama dengan CET 1 rasio) sebesar 19,53% juga masih berada di atas ketentuan minimum yang berlaku (Tier 1 sebesar 19,53% dan CET 1 sebesar 19,53%), hal ini mengindikasikan Bank memiliki cadangan modal yang dibutuhkan untuk menanggung semua risiko yang teridentifikasi dan memastikan tersedianya modal yang berkesinambungan untuk mengatasi seluruh risiko.

Bank Raya akan terus menjaga struktur permodalan yang optimal untuk mendukung pertumbuhan bisnis. Selain itu, Bank juga akan mengelola struktur permodalan yang kuat dan sehat untuk menyediakan ruang yang memadai bagi pertumbuhan bisnis yang optimal, dan pada saat bersamaan mengelola modal pada tingkat yang aman.

Struktur modal Perseroan per 31 Desember 2021 dapat dijelaskan dalam tabel berikut:

As of December 31, 2021, the position of the Capital Adequacy Ratio (CAR) for banks alone is at the level of 20.24%, is above the minimum capital requirement, including additional buffer capital obligations. In addition, the Tier 1 ratio (currently equal to the CET 1 ratio) is 19.53% is also still above the applicable minimum requirement (Tier 1 of 19.53% and CET 1 of 19.53%), this indicates that the Bank has capital reserves required to cover all identified risks and ensure the availability of sustainable capital to overcome all risks. risk.

Bank Raya will continue to maintain an optimal capital structure to support business growth. In addition, the Bank will also manage a strong and healthy capital structure to provide adequate space for optimal business growth, and at the same time manage capital at a safe level.

The Company's capital structure as of December 31, 2021 can be explained in the following table:

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020
Modal Capital	2.158.071	4.305.030
Modal Inti Core Capital	2.083.285	4.164.448
Modal Pelengkap Supplementary Capital	74.786	140.583
Aset Tertimbang Menurut Risiko Risk Weighted Assets	10.664.558	17.693.804
Total ATMR Risiko Kredit Total RWA Credit Risk	9.228.325	16.329.043
Total ATMR Risiko Pasar Total RWA Market Risk	60.687	82.880
Total ATMR Risiko Operasional Total Operational Risk RWA	1.375.546	1.281.882
Rasio CAR CAR Ratio	20,24%	24,33%
Rasio CET 1 CET Ratio 1	19,53%	23,54%
Rasio Tier 1 Tier 1 Ratio	19,53%	23,54%
Rasio Tier 2 Tier 2 Ratio	0,70%	0,79%
Rasio Total Total Ratio	20,24%	24,33%
Rasio Minimum CET Minimum CET Ratio	3,94%	4,50%
Rasio Minimum Tier 1 Tier 1 Minimum Ratio	6,00%	6,00%
CAR Minimum berdasar Profil Risiko Minimum Minimum CAR based on Minimum Risk Profile	9,94%	10,00%

Ikatan Material Untuk Investasi Barang Modal Material Bond for Capital Goods Investment

Hingga akhir tahun 2021, Bank Raya tidak memiliki ikatan yang material dengan pihak manapun terkait investasi barang modal.

Until the end of 2021, Bank Raya does not have material ties with any party related to capital goods investment.

Investasi Barang Modal yang Direalisasikan Pada Tahun Buku Capital Goods Investment Realised In The Fiscal Year

dalam jutaan rupiah/in million rupiah

Jenis Investasi Investment Type	Tujuan Investasi Investment Purpose	Nilai Investasi pada tahun 2021 Investment Value in 2021
Hak atas Tanah Land rights	Pengembangan Usaha Business development	-
Bangunan Building	Pendukung Operasional Operational Support	2.431
Renovasi Bangunan Sewa Rent Building Renovation	Pendukung Operasional Operational Support	1.655
Kendaraan Vehicle	Pendukung Operasional Operational Support	363
Perlengkapan Kantor Office supplies	Pendukung Operasional Operational Support	23.060
Aset dalam Penyelesaian Assets in Construction	Pendukung Operasional Operational Support	7.981
Aset Hak Guna Right of Use Assets	Pendukung Operasional Operational Support	3.858
Jumlah Amount		39.348

Pada tahun 2021, Investasi barang modal sebesar Rp39,35 miliar dengan investasi terbesar pada Perlengkapan.

In 2021, capital goods investment is IDR 39.35 billion with the largest investment in Office supplies.

Perbandingan Target dan Realisasi, Serta Proyeksi Satu Tahun ke Depan Comparison of Targets and Realisations, and Projections for the One Year Ahead

Perbandingan Target dan Realisasi

Target and Realisation Comparison

dalam jutaan rupiah/in million rupiah

Uraian Description	Target RBB 2021 RBB Target 2021	Realisasi 2021 2021 Realization	Pencapaian Achievement
Kredit yang Diberikan Credits Granted	12.607.811	11.608.327	92,07%
Total Aset Total Assets	16.358.720	16.866.523	103,10%
Dana Pihak Ketiga Third-party funds	13.704.141	13.496.292	98,48%

dalam jutaan rupiah/in million rupiah

Uraian Description	Target RBB 2021 RBB Target 2021	Realisasi 2021 2021 Realization	Pencapaian Achievement
Pendapatan Bunga Interest income	1.564.165	1.647.185	105,31%
Laba Bersih Net profit	(3.320.297)	(3.045.701)	109,02%

Proyeksi Satu Tahun ke Depan

Projection of One Year Ahead

Uraian Description	Target RKAP 2022 2022 RKAP Target
Kredit yang Diberikan Credits Granted	- 35% sd -40%
Total Aset Total Assets	-20% sd -25%
Dana Pihak Ketiga Third-party funds	-40% sd -45%
Net Interest Margin Net Interest Margin	3% sd 4%
NPL Gross NPL Gross	< 3%

Kebijakan dan Pembagian Dividen Policy and Dividend Distribution

Kebijakan Dividen

Sesuai dengan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas, pembagian dividen dilakukan berdasarkan keputusan Rapat Umum Pemegang Saham. Sebelum berakhirnya tahun keuangan, dividen interim dapat dibagikan sepanjang diperbolehkan oleh Anggaran Dasar Perusahaan dan pembagian dividen interim tidak menyebabkan Aset Bersih Perusahaan kurang dari modal ditempatkan dan disetor penuh serta cadangan wajib Perusahaan. Pembagian dividen interim ditetapkan oleh Direksi setelah disetujui Dewan Komisaris.

Bank Raya senantiasa memperhatikan hak para pemegang saham tanpa mengabaikan kondisi keuangan Bank. Keputusan pembagian dividen Bank dikaitkan dengan, antara lain laba bersih yang didapat pada tahun fiskal dan kewajiban Bank untuk mengalokasikan dana cadangan sesuai dengan aturan yang berlaku serta kondisi keuangan Bank. Bank Raya juga mempertimbangkan tingkat pertumbuhan ke depan dan rencana ekspansi ketika memutuskan pembagian dividen kepada para pemegang saham.

Dividend Policy

In accordance with Law No. 40 of 2007 concerning Limited Liability Companies, the distribution of dividends is based on the decision of the General Meeting of Shareholders. Prior to the end of the financial year, interim dividends may be distributed to the extent permitted by the Company's Articles of Association and the distribution of interim dividends does not cause the Company's Net Assets to be less than the issued and fully paid capital and the Company's mandatory reserves. The distribution of interim dividends is determined by the Board of Directors after being approved by the Board of Commissioners.

Bank Raya always pays attention to the rights of shareholders without ignoring the Bank's financial condition. The decision to distribute the Bank's dividends is related to, among other things, the net profit earned in the fiscal year and the Bank's obligation to allocate reserve funds in accordance with applicable regulations and the Bank's financial condition. Bank Raya also considers future growth rates and expansion plans when deciding on the distribution of dividends to shareholders.

Kronologis Pembagian Dividen

Berdasarkan keputusan RUPS Tahunan yang diselenggarakan pada 9 April 2021, Bank Raya tidak membagikan dividen tunai kepada pemegang saham. Dengan demikian, dalam 2 tahun terakhir Bank Raya tidak membagikan dividen kepada pemegang saham.

Dividend Distribution Chronology

Based on the decision of the Annual GMS held on April 9, 2021, Bank Raya did not distribute cash dividends to shareholders. Thus, in the last 2 years Bank Raya did not distribute dividends to shareholders.

Kontribusi Kepada Negara Contribution To The Country

Bank Raya memiliki kontribusi kepada negara yang diwujudkan melalui pemenuhan kewajiban perusahaan sebagai wajib pajak dan sebagai pemotong/pemungut pajak. Sebagai wajib pajak, kontribusi terbesar Perusahaan adalah memenuhi kewajiban PPh Badan. Berikut rincian pembayarn pajak Bank pada tahun 2021:

Bank Raya has a contribution to the state which is realized through the fulfillment of the company's obligations as a taxpayer and as a tax cutter/collector. As a taxpayer, the Company's biggest contribution is to fulfill its corporate income tax obligations. The following are the details of the Bank's tax payments in 2021:

dalam jutaan rupiah/in million rupiah

Jenis Pajak Tax Type	2020	2019
PPh 25/29 (Badan)	16.435	7.432

Realisasi Penggunaan Dana Hasil Penawaran Umum Realisation of the Use of Public Offering Funds

Pada tahun 2021, Bank Raya melakukan Penawaran Umum Dengan Hak Memesan Efek Terlebih Dahulu dan mengumpulkan dana sebesar Rp1.159.999.703.500. Hasil bersi dari penawaan umum tersebut setelah dipotong biaya emisi adalah sebesar Rp1.150.799.718.967. Hingga akhir tahun 2021, Bank belum menggunakan dana hasil penawaran umum tersebut dengan rincian sebagai berikut:

In 2021, Bank Raya conducted a Public Offering with Pre-emptive Rights and raised funds amounting to IDR 1,159,999,703,500. The net result of the public offering after deducting the cost of issuance is IDR 1,150,799,718,967. Until the end of 2021, the Bank has not used the proceeds from the public offering with the following details:

No	Jenis Penawaran Umum Public Offer Type	Tanggal Efektif Effective date	Nilai Realisasi Hasil Penawaran Umum Realised Value of Public Offering Results			Rencana Penggunaan Dana Menurut Prospektus dan RUPS Plan for Use of Funds According to the		Realisasi Penggunaan Dana Menurut Prospektus Realised Use of Funds According to the Prospectus		Sisa Dana Hasil Penawaran Umum Remaining Funds from Public Offering
			Jumlah Hasil Penawaran Umum Total Proceeds of Public Offering	Biaya Penawaran Umum Public Offering Fee	Hasil Bersih Net Result	Kredit Berbasis Digital Digital Based Credit	Total Total	Kredit Berbasis Digital Digital Based Credit	Total Total	
1	Penawaran Umum Dengan Hak Memesan Efek Terlebih Dahulu Public Offering With Pre-emptive Rights	Desember 2021 December 2021	1.159.999.703.500	9.199.984.533	1.150.799.718.967	1.150.799.718.967	1.150.799.718.967	Nihil None	Nihil None	1.150.799.718.967

Informasi dan Fakta Material yang Terjadi Setelah Tanggal Laporan Akuntan

Material Information and Facts That Happened After the Accountant's Report Date

Tidak terdapat informasi dan fakta material yang terjadi setelah tanggal laporan akuntan.

There are no important facts or events that happened subsequent to the accountant's report's date.

Informasi Material Mengenai Investasi, Ekspansi, Divestasi, Penggabungan/ Peleburan Usaha, Akuisisi, Restrukturisasi Utang/Modal

Material Information Regarding Investment, Expansion, Divestment, Business Merger/ Consolidation, Acquisition, Debt/Capital Restructuring

Pada tahun 2021, tidak terdapat informasi dan fakta material mengenai investasi, divestasi, penggabungan/peleburan usaha, akuisisi, dan restrukturisasi utang/modal yang terkait dengan Bank Raya.

In 2021, there are no important facts or information on Bank Raya's investment, divestment company merger/consolidation, acquisition, or debt/capital restructuring.

Informasi Keuangan yang Mengandung Kejadian yang Bersifat Luar Biasa dan Jarang Terjadi

Financial Information Containing Extraordinary and Rare Events

Pada tahun 2021, tidak terdapat informasi keuangan yang mengandung kejadian yang bersifat luar biasa dan jarang terjadi.

There is no financial data pertaining to remarkable and rare incidents in 2021.

Informasi Transaksi Material yang Mengandung Benturan Kepentingan dan/atau Transaksi Dengan Pihak Afiliasi

Material Transaction Information Containing Conflict of Interest and/or Transactions With Affiliated Parties

Transaksi yang Mengandung Benturan Kepentingan

Tidak terdapat transaksi material yang mengandung benturan kepentingan di Bank Raya pada tahun 2021.

Transaksi dengan Pihak Afiliasi

Transaksi afiliasi adalah transaksi yang dilakukan oleh Bank atau perusahaan terkendali dengan afiliasi dari Bank atau afiliasi dari anggota Direksi, anggota Dewan Komisaris, atau Pemegang Saham.

Pemenuhan Peraturan dan Ketentuan

Untuk memenuhi peraturan Bapepam-LK No.IX.E.1 butir 2 (dua) huruf b angka 3 (tiga) dan huruf c angka 4 (empat), Lampiran Keputusan Ketua Bapepam dan LK No. KEP-412/BL/2009 tanggal 25 November 2009 tentang Transaksi Afiliasi dan Benturan Kepentingan Transaksi tertentu, Bank Raya telah melakukan pelaporan transaksi dengan pihak berelasi yang memenuhi kategori transaksi afiliasi. Seluruh transaksi afiliasi telah dilaporkan pada Otoritas Jasa Keuangan.

Kewajaran dan Alasan Dilakukannya Transaksi

Bank Raya memastikan seluruh transaksi yang dilakukan selama tahun 2021 dilakukan secara wajar (*Arm's Length*) dan sesuai dengan persyaratan komersial normal. Kewajaran transaksi dengan pihak terkait atau mengandung benturan kepentingan telah dilakukan secara wajar sesuai peraturan perundang-undangan. Transaksi dilakukan atas dasar alasan kebutuhan dan bebas dari konflik kepentingan.

Terkait dengan transaksi dengan pihak berelasi, Bank melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam PSAK No. 7 (Revisi 2010) "Pengungkapan Pihak-pihak Berelasi" dan Peraturan Bapepam dan LK No. KEP-347/BL/2012 tanggal 25 Juni 2012 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik". Ikhtisar transaksi dengan pihak berelasi sepanjang tahun 2021 adalah sebagai berikut:

Transactions Containing Conflict of Interest

There were no material transactions containing conflicts of interest at Bank Raya in 2021.

Transactions with Affiliated Parties

Affiliated transactions are transactions conducted by a Bank or controlled company with affiliates of the Bank or affiliates of members of the Board of Directors, members of the Board of Commissioners, or Shareholders.

Fulfillment of Rules and Conditions

To comply with Bapepam-LK regulation No. IX.E.1 point 2 (two) letter b number 3 (three) and letter c number 4 (four), Attachment to Decision of the Chairman of Bapepam and LK No. KEP-412/BL/2009 dated November 25, 2009 regarding Affiliated Transactions and Conflict of Interest Certain Transactions, Bank Raya has reported transactions with related parties that meet the category of affiliated transactions. All affiliated transactions have been reported to the Financial Services Authority.

Fairness and Reasons for the Transaction

Bank Raya ensures that all transactions carried out during 2021 are carried out fairly (*Arm's Length*) and in accordance with normal commercial requirements. The fairness of transactions with related parties or containing conflicts of interest has been carried out fairly in accordance with the laws and regulations. Transactions are carried out on the basis of necessity and free from conflicts of interest.

In relation to transactions with related parties, the Bank conducts transactions with related parties as defined in PSAK No. 7 (Revised 2010) "Related Party Disclosures" and Bapepam and LK Regulation No. KEP-347/BL/2012 dated June 25, 2012 concerning "Presentation and Disclosure of Financial Statements of Issuers or Public Companies". The summary of transactions with related parties throughout 2021 is as follows:

Pihak Berelasi Related Parties	Sifat Hubungan Nature of Relationship	Jenis Transaksi Transaction Type
PT Bank Rakyat Indonesia (Persero) Tbk	Entitas Induk Parent Entity	Giro pada bank lain, penempatan pada bank lain, efek-efek, tagihan derivatif, garansi bank yang diterbitkan, penjualan dan pembelian mata uang asing Current accounts with other banks, placements with other banks, securities, derivative claims, bank guarantees issued, sales and purchases of foreign currencies
PT Bringin Gigantara	Hubungan pengendalian melalui entitas induk Control relationship through parent	Kredit yang diberikan Credit granted
Pemerintah Republik Indonesia	Kepemilikan saham mayoritas melalui Kementerian Keuangan RI Majority share ownership through the Ministry of Finance of the Republic of Indonesia	Efek-efek Securities
PT Bank Mandiri (Persero) Tbk	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Giro pada bank lain Current accounts with other banks
PT Mandiri Manajemen Investasi	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
PT Bank Negara Indonesia (Persero) Tbk	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Giro pada bank lain Current accounts with other banks
PT BNI Asset Management	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
Perum Perhutani	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Perkebunan Nusantara II, III, VII, XIII dan XIV	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Laras Astra Kartika	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Asuransi Jasa Tania Tbk	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Garansi bank yang diterbitkan Issued bank guarantee
PT Adhi Karya (Persero) Tbk	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities

Pihak Berelasi Related Parties	Sifat Hubungan Nature of Relationship	Jenis Transaksi Transaction Type
PT Bank Tabungan Negara (Persero) Tbk	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
PT Kereta Api Indonesia (Persero)	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
PT Perusahaan Listrik Negara (Persero)	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
PT Jasamarga Gempol Pasuruan	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Jasamarga Ngawi Kertosono Kediri	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Jasamarga Surabaya Mojokerto	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Kresna Kusuma Dyandra Marga	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
Lembaga Pembiayaan Ekspor Indonesia	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
PT Utama Karya (Persero)	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Indonesia Infrastructure Finance	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities
Perum Damri	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan Credit granted
PT Sarana Multigriya Finansial (Persero)	Hubungan pengendalian melalui Pemerintah Pusat RI Control relationship through the Central Government of the Republic of Indonesia	Efek-efek Securities

Realisasi Transaksi Pihak Berelasi

Realization of Related Party Transactions

Dalam jutaan rupiah/In million rupiah

Uraian Description	2021	2020
Giro pada bank lain Current accounts with other banks	66.362	36.198
Penempatan pada Bank Indonesia dan bank lain Placements with Bank Indonesia and other banks	6	6
Efek-efek Effects	3.299.106	3.236.508
Tagihan derivatif Derivative bills	-	-
Kredit yang diberikan Credit granted	1.708.598	2.478.519
Jumlah Total Total number	5.074.072	5.751.231
Giro Current Account	96.029	1.014.264
Tabungan Savings	244.617	737.207
Deposito berjangka Time deposit	736.536	4.491.400
Simpanan dari bank lain Deposits from other banks	71.263	210.750
Pinjaman yang diterima Loans received	16.517	17.319
Liabilitas derivatif Derivative liabilities	-	-
Kompensasi kepada karyawan kunci Compensation to key employees	9.575	5.669
Jumlah Total	1.174.538	6.476.609

Perubahan Peraturan Perundang-Undangan yang Berdampak Terhadap Perusahaan

Changes in Law Regulations That Impact on the Company

No.	Ketentuan Provision	Tanggal Berlaku Effective date
1.	SEOJK No.9/SEOJK.03/2020 tentang transparansi & publikasi laporan BUK SEOJK No.9/SEOJK.03/2020 regarding transparency & publication of BUK reports	2 Juni 2020 June 2, 2020
2.	PBI No.22/19/PBI/2020 tentang perubahan atas PBI No.22/4/PBI/2020 tentang insentif bagi bank yang memberikan penyediaan dana untuk kegiatan ekonomi tertentu guna mendukung penanganan dampak perekonomian akibat covid PBI No.22/19/PBI/2020 concerning amendments to PBI No.22/4/PBI/2020 regarding incentives for banks that provide funds for certain economic activities to support handling the economic impact caused by COVID	16 Desember 2021 December 16, 2021
3.	PBI No.22/33/PBI/2020 tentang sistem pembayaran PBI No.22/33/PBI/2020 regarding the payment system	1 Juli 2021 July 1, 2021
4.	SEOJK No.26/SEOJK.03/2020 tentang pelaporan BUK melalui sistem pelaporan OJK SEOJK No.26/SEOJK.03/2020 concerning BUK reporting through the OJK reporting system	22 Desember 2021 December 22, 2021
5.	PBI No.22/20/PBI/2020 tentang perlindungan konsumen BI PBI No.22/20/PBI/2020 concerning BI consumer protection	22 Desember 2021 December 22, 2021
6.	PADG No.23/2/PADG/2021 tentang perubahan PADG No.21/26/PADG/2019 tentang Devisa Hasil Ekspor & Devisa Pembayaran Impor PADG No.23/2/PADG/2021 regarding changes to PADG No.21/26/PADG/2019 concerning Foreign Exchange Export Proceeds & Foreign Exchange Import Payments	1 Januari 2021 January 1, 2021
7.	POJK No.3/POJK.04/2021 tentang penyelenggaraan kegiatan di bidang pasar modal POJK No.3/POJK.04/2021 regarding the implementation of activities in the capital market sector	22 Februari 2021 February 22, 2021
8.	PADG No.23/6/PADG/2021 tentang perubahan atas PADG No.21/25/PADG/2019 tentang rasio LTV untuk kredit properti, rasio FTV untuk pembiayaan properti dan uang muka untuk kredit atau pembiayaan kendaraan bermotor PADG No.23/6/PADG/2021 regarding amendments to PADG No.21/25/PADG/2019 concerning LTV ratio for property loans, FTV ratio for property financing and down payments for loans or motor vehicle financing	5 April 2021 April 5, 2021
9.	POJK No.64/POJK.03/2020 tentang perubahan atas POJK No.18/POJK.03/2017 tentang pelaporan & permintaan informasi debitur melalui sistem layanan informasi keuangan POJK No.64/POJK.03/2020 regarding amendments to POJK No.18/POJK.03/2017 regarding reporting & requests for debtor information through the financial information service system	29 Desember 2020 December 29, 2020
10.	Permenkominfo No.5 th 2020 tentang penyelenggaraan sistem elektronik lingkup privat Permenkominfo No. 5 of 2020 concerning the implementation of private electronic systems	20 November 2020 November 20, 2020
11.	PADG No.23/8/2021 tentang perubahan atas PADG No.21/18/PADG/2019 tentang implementasi standar nasional QR code untuk pembayaran PADG No.23/8/2021 regarding amendments to PADG No.21/18/PADG/2019 regarding the implementation of the national standard QR code for payments	1 Mei 2021 May 1, 2021
12.	SEOJK No.12/SEOJK.03/2021 tentang rencana bisnis bank umum SEOJK No.12/SEOJK.03/2021 concerning commercial bank business plans	31 Maret 2021 March 31, 2021
13.	Peraturan LPS No.1 tahun 2021 tentang Rencana Resolusi bagi Bank Umum LPS Regulation No.1 of 2021 concerning Resolution Plans for Commercial Banks	30 Maret 2021 March 30, 2021

No.	Ketentuan Provision	Tanggal Berlaku Effective date
14.	PBI No.22/22/PBI/2020 tentang Perubahan atas PBI No.21/9/PBI/2019 tentang Laporan Bank Umum Terintegrasi	30 Desember 2021
	PBI No.22/22/PBI/2020 concerning Amendments to PBI No.21/9/PBI/2019 concerning Integrated Commercial Bank Reports	December 30, 2021
15.	PADG No.23/7/PADG/2021 tentang Perubahan PADG No.21/22/PADG/2019 tentang RIM & PLM bagi BUK, BUS & UUS	1 Mei 2021
	PADG No.23/7/PADG/2021 concerning Amendments to PADG No.21/22/PADG/2019 concerning RIM & PLM for BUK, BUS & UUS	May 1, 2021
16.	Permenkeu No.213/PMK.06/2020 tentang Petunjuk Pelaksanaan Lelang	23 Maret 2021
	Minister of Finance Regulation No.213/PMK.06/2020 concerning Auction Implementation Guidelines	March 23, 2021
17.	PP No.35 th 2021 tentang PKWT, Alih Daya, waktu kerja & waktu istirahat & PHK	2 Februari 2021
	PP No. 35 of 2021 regarding PKWT, Outsourcing, work time & rest time & layoffs	February 2, 2021
18.	PP No.36 th 2021 tentang Pengupahan	2 Februari 2021
	PP No.36 of 2021 concerning Wages	February 2, 2021
19.	PP No.37 th 2021 tentang penyelenggaraan program jaminan kehilangan pekerjaan	2 Februari 2021
	PP No.37 of 2021 regarding the implementation of the job loss guarantee program	February 2, 2021
20.	SEOJK No.6/SEOJK.05/2021 tentang Pedoman Penerapan Program APU PPT bagi penyelenggara layanan pinjam meminjam uang berbasis TI	29 Januari 2021
	SEOJK No.6/SEOJK.05/2021 concerning Guidelines for the Implementation of the APU PPT Program for IT-based money-lending service providers	January 29, 2021
21.	PADG No.23/5/PADG/2021 tentang perubahan atas PADG No.21/23/PADG/2021 tentang Laporan Bank Umum Terintegrasi	31 Maret 2021
	PADG No.23/5/PADG/2021 regarding amendments to PADG No.21/23/PADG/2021 concerning Integrated Commercial Bank Reports	March 31, 2021
22.	PBI No.23/6/PBI/2021 tentang Penyedia Jasa Pembayaran	1 Juli 2021
	PBI No.23/6/PBI/2021 concerning Payment Service Providers	July 1, 2021
23.	PBI No.23/7/PBI/2021 tentang Penyelenggara Infrastruktur Sistem Pembayaran	1 Juli 2021
	PBI No.23/7/PBI/2021 concerning Payment System Infrastructure Operators	July 1, 2021
24.	PADG No.23/13/PADG/2021 tentang Perubahan Kedua atas PADG No.21/23/PADG/2019 ttg LBUT	1 Juli 2021
	PADG No.23/13/PADG/2021 concerning the Second Amendment to PADG No.21/23/PADG/2019 concerning LBUT	July 1, 2021
25.	POJK No.13/POJK.03/2021 tentang Penyelenggara Produk Bank Umum	30 Oktober 2021
	POJK No.13/POJK.03/2021 regarding Commercial Bank Product Operators	October 30, 2021
26.	Permenkeu No.82/PMK.03/2021 tentang Perubahan atas Permenkeu No.9/PMK.03/2021 tentang Insentif Pajak Untuk Wajib Pajak Terdampak Pandemi Corona Virus Disease 2019	1 Juli 2021
	Minister of Finance Regulation No. 82/PMK.03/2021 concerning Amendments to Minister of Finance Regulation No.9/PMK.03/2021 concerning Tax Incentives for Taxpayers Affected by the 2019 Corona Virus Disease Pandemic	July 1, 2021
27.	Permen Ketenagakerjaan No.16 tahun 2021 tentang perubahan Permen Ketenagakerjaan No.14 tahun 2020 tentang Pedoman Pemberian Bantuan Pemerintah berupa Subsidi Gaji/Upah bagi Pekerja/Buruh dalam Penanganan Dampak Covid-19	28 Juli 2021
	Minister of Manpower No. 16 of 2021 concerning amendments to Minister of Manpower No. 14 of 2020 concerning Guidelines for Providing Government Assistance in the form of Salary/Wage Subsidies for Workers/Labourers in Handling the Impact of Covid-19	July 28, 2021

No.	Ketentuan Provision	Tanggal Berlaku Effective date
28.	SEOJK No.16/SEOJK.04/2021 tentang Bentuk dari Isi Laporan Tahunan Emiten atau Perusahaan Publik SEOJK No.16/SEOJK.04/2021 concerning the Form of the Contents of the Annual Report of Issuers or Public Companies	29 Juni 2021 June 29, 2021
29.	Permen Ketenagakerjaan No.15 tahun 2021 tentang Tata Cara Pemberian Manfaat Jaminan Kehilangan Pekerjaan Minister of Manpower Regulation No. 15 of 2021 concerning Procedures for Providing Job Loss Guarantee Benefits	28 Juli 2021 July 28, 2021
30.	POJK No.12/POJK.03/2021 tentang Bank Umum POJK No.12/POJK.03/2021 concerning Commercial Banks	30 Oktober 2021 October 30, 2021
31.	POJK No.14/POJK.03/2021 tentang Perubahan atas No.34/POJK.03/2018 tentang Penilaian Kembali Pihak Utama POJK No.14/POJK.03/2021 concerning Amendments to No.34/POJK.03/2018 concerning Reassessment of Main Parties	30 Juli 2021 July 30, 2021
32.	Perbandingan POJK No.13/POJK.03/2021 tentang Bank Umum dengan PBI No.11/1/PBI/2009 tentang Bank Umum	30 Oktober 2021 October 30, 2021
33.	PBI No.23/13/PBI/2021 tentang Rasio Pembiayaan Inklusi Makroprudensial bagi Bank Umum Konvensional Bank Umum Syariah dan Unit Usaha Syariah PBI No.23/13/PBI/2021 concerning Macroprudential Inclusion Financing Ratios for Conventional Commercial Banks Islamic Commercial Banks and Sharia Business Units	31 Agustus 2021 August 31, 2021
34.	SK Direksi PT Bursa Efek Indonesia Nomor-00077/BEI/09-2021 Perihal Perubahan Ketentuan Pelaksanaan Pembagian Dividen Saham, Pembagian Saham Bonus dan Pembagian Dividen Interim Decree of the Board of Directors of the Indonesia Stock Exchange Number-00077/BEI/09-2021 Regarding Changes in Provisions for the Implementation of Share Dividend Distribution, Bonus Share Distribution and Interim Dividend Distribution	31 September 2021 September 31, 2021
35.	SE KPK No.19 tahun 2021 tentang Pengendalian Gratifikasi Terkait Industri Jasa Keuangan SE KPK No.19 of 2021 concerning Gratification Control Related to the Financial Services Industry	23 Juli 2021 July 23, 2021
36.	PBI No.23/11/PBI/2021 tentang Standar Nasional Sistem Pembayaran PBI No.23/11/PBI/2021 concerning National Standards for Payment Systems	13 Agustus 2021 August 13, 2021
37.	PADG No.23/22/PADG/2021 tentang Rekening Giro di BI PADG No.23/22/PADG/2021 concerning Current Accounts at BI	13 September 2021 September 13, 2021
38.	SEOJK NO 16/SEOJK.04/2021 tentang Bentuk & Isi Laporan Tahunan Emiten atau Perusahaan Publik SEOJK NO 16/SEOJK.04/2021 concerning Form & Content of Annual Reports of Issuers or Public Companies	29 Juni 2021 June 29, 2021
39.	PBI No.23/5/PBI/2021 tentang Sistem Monitoring Transaksi Valuta Asing terhadap Rupiah PBI No.23/5/PBI/2021 concerning Monitoring System for Foreign Exchange Transactions against Rupiah	2 Juni 2021 June 2, 2021
40.	Permensos No.4 tahun 2021 tentang Undian Gratis Berhadiah Minister of Social Affairs Regulation No. 4 of 2021 concerning Free Sweepstakes with Prizes	15 Juli 2021 July 15, 2021
41.	PBI No.23/11/PBI/2021 tentang Standar Nasional Sistem Pembayaran PBI No.23/11/PBI/2021 concerning National Standards for Payment Systems	13 Agustus 2021 August 13, 2021

No.	Ketentuan Provision	Tanggal Berlaku Effective date
42.	Permen BUMN NOo.PER.05/MBU/04/2021 tentang Program Tanggung Jawab Sosial dan Lingkungan BUMN	20 April 2021
	SOE Ministerial Regulation NOo.PER.05/MBU/04/2021 concerning SOE Social and Environmental Responsibility Programs	April 20, 2021
43.	PADG No.23/11/PADG/2021 tentang Sistem <i>Monitoring</i> Transaksi Valuta Asing terhadap Rupiah	2 Juli 2021
	PADG No.23/11/PADG/2021 concerning Monitoring System for Foreign Exchange Transactions against Rupiah	July 2, 2021
44.	Permen Lingkungan Hidup dan Kehutanan No.4 tahun 2021 tentang Faktor Usaha dan/atau Kegiatan yang Wajib Memiliki Analisis Mengenai Dampak Lingkungan Hidup	1 April 2021
	Minister of Environment and Forestry No. 4 of 2021 concerning Business Factors and/or Activities Required to Have an Environmental Impact Analysis	April 1, 2021
45.	Kepmenaker No.104 tahun 2021 tentang Pedoman Pelaksanaan Hubungan Kerja Selama Masa Pandemi <i>Corona Virus Disease</i> 2019	13 Agustus 2021
	Minister of Manpower Decree No. 104 of 2021 concerning Guidelines for Implementing Work Relations During the 2019 Corona Virus Disease Pandemic	August 13, 2021
46.	PADG No.23/15/PADG/2021 <i>Interface</i> Pembayaran tentang Standar Nasional <i>Open Application Programming</i>	1 Agustus 2021
	PADG No.23/15/PADG/2021 Payment Interface on Open Application Programming National Standard	August 1, 2021
47.	PP No.5 tahun 2021 tentang Penyelenggaraan Perizinan Berusaha Berbasis Risiko PP No. 5 of 2021 concerning Implementation of Risk-Based Business Licensing	2 Februari 2021 February 2, 2021
48.	POJK No.11/POJK.02/2021 tentang Penatalaksanaan Lembaga Sertifikasi Profesi di Sektor Jasa Keuangan	7 Juli 2021
	POJK No.11/POJK.02/2021 concerning Management of Professional Certification Institutions in the Financial Services Sector	July 7, 2021
49.	Permenkeu No.4/PMK.03/2021 tentang Pembayaran Bea Materai Ciri Umum dan Ciri Khusus Materai Tempel, Materai dalam Bentuk Lain, dan Penentuan Keabsahan Materai Serta Pemateraan Kemudian	20 Januari 2021
	Minister of Finance Regulation No.4/PMK.03/2021 concerning Payment of Stamp Duty for General Characteristics and Special Characteristics of Pasted Stamps, Stamps in Other Forms, and Determination of the Validity of Stamps and Later Stamping	January 20, 2021
50.	PADG No.23/23/PADG/2021 tentang Perubahan PADG No.20/4/PADG/2018 tentang Penyelenggaraan Penatausahaan Surat Berharga Melalui BI SSSS	13 September 2021
	PADG No.23/23/PADG/2021 concerning Amendments to PADG No.20/4/PADG/2018 concerning Securities Administration Through BI SSSS	September 13, 2021
51.	PBI No.23/15/PBI/2021 tentang Layanan Kebanksentralan PBI No.23/15/PBI/2021 concerning Central Banking Services	10 September 2021 September 10, 2021

Perubahan Kebijakan Akuntansi Accounting Policy Changes

No.	Kebijakan Akuntansi Accounting Policies	Penjelasan Exegesis	Pengaruh Terhadap Laporan Keuangan Perseroan Influence on the Financial Statements of the Company
1.	PSAK 71 tentang "Instrumen Keuangan"	Mengatur klasifikasi dan pengukuran instrumen keuangan berdasarkan karakteristik dari arus kas kontraktual dan model bisnis entitas; metode kerugian kredit ekspektasian untuk penurunan nilai yang menghasilkan informasi yang lebih tepat waktu, relevan dan dimengerti oleh pemakai laporan keuangan; akuntansi untuk lindung nilai yang merefleksikan manajemen risiko entitas lebih baik dengan memperkenalkan persyaratan yang lebih umum berdasarkan pertimbangan manajemen	Melakukan penyesuaian terhadap amandemen yang ada, khususnya untuk transaksi-transaksi terdampak.
	PSAK 71 concerning "Financial Instruments"	Regulate the classification and measurement of financial instruments based on the contractual cash flows and the entity's business model; the expected credit loss method for impairment, which provides more timely, relevant, and understandable information to financial statement users; and accounting for hedges, which more accurately reflects the entity's risk management by introducing more general requirements based on management's judgement.	Adjust existing amendments, particularly for transactions that are impacted.
2.	Amandemen PSAK 71 tentang "Instrumen Keuangan", fitur pembayaran di muka dengan kompensasi negatif.	Amandemen ini mengklarifikasikan bahwa aset keuangan melewati kriteria "semata-mata pembayaran pokok dan bunga atas jumlah pokok terutang" terlepas dari peristiwa atau keadaan yang menyebabkan pemutusan awal kontrak dan terlepas dari pihak mana membayar atau menerima kompensasi yang wajar untuk awal pemutusan kontrak	Melakukan penyesuaian terhadap amandemen yang ada, khususnya untuk transaksi-transaksi terdampak.
	The amendment to PSAK 71, "Financial Instruments," includes a provision for advance payment with negative compensation.	This amendment clarifies that financial assets satisfy the criterion of "exclusive payment of principal and interest on the principal amount owed" regardless of the event or circumstance that resulted in the contract being terminated early and regardless of who paid or received reasonable compensation for the contract being terminated early.	Adjust existing amendments, particularly for transactions that are impacted.

No.	Kebijakan Akuntansi Accounting Policies	Penjelasan Exegesis	Pengaruh Terhadap Laporan Keuangan Perseroan Influence on the Financial Statements of the Company
3.	PSAK 72 tentang "Pendapatan dari kontrak dengan pelanggan", yang diadopsi dari IFRS 15	Merupakan standar tunggal untuk pengakuan pendapatan yang merupakan hasil dari <i>joint project</i> yang sukses antara Dewan Standar Akuntansi Internasional dan Dewan standar Akuntansi Keuangan, mengatur model pengakuan pendapatan dari kontrak dengan pelanggan, sehingga entitas diharapkan dapat melakukan analisis sebelum mengakui pendapatan.	Penerapan PSAK ini, tidak menimbulkan perubahan yang signifikan terhadap pelaporan keuangan dan pengungkapan dalam laporan keuangan
	PSAK 72, "Revenue from client contracts," was adopted from IFRS 15.	It is a single revenue recognition standard that is the result of a successful collaboration between the International Accounting Standards Board and the Financial Accounting Standards Board. It establishes a revenue recognition model that is based on customer contracts, and it expects businesses to do research before they recognise revenue.	The application of this PSAK has had no discernible effect on financial reporting or disclosures in financial statements.
4.	PSAK 73 tentang "Sewa",	Menetapkan prinsip pengakuan, pengukuran, penyajian dan pengungkapan atas sewa dengan memperkenalkan model akuntansi tunggal dengan menyaratkan untuk mengakui aset hak-guna (<i>right-of-use assets</i>) dan liabilitas sewa. Terdapat 2 pengecualian opsional dalam pengakuan aset dan liabilitas sewa, yakni untuk (1) sewa jangka pendek dan (2) sewa yang aset dasarnya (<i>underlying assets</i>) bernilai rendah.	Melakukan penyesuaian terhadap amandemen yang ada, khususnya untuk transaksi-transaksi terdampak.
	PSAK 73 concerning "Lease",	Establish guidelines for the recognition, measurement, presentation, and disclosure of leases by requiring the recognition of right-of-use assets and lease liabilities under a single accounting model. There are two possible exceptions to the requirement to recognise leased assets and liabilities, namely (1) short-term leases and (2) leases with low-value underlying assets.	Adjust existing amendments, particularly for transactions that are impacted.
5.	PSAK 15 tentang "Investasi pada Entitas Asosiasi dan Ventura Bersama",	Mengatur bahwa entitas juga menerapkan PSAK 71 atas instrumen keuangan pada entitas asosiasi atau <i>ventura</i> bersama dimana metode ekuitas tidak diterapkan. Hal ini termasuk kepentingan jangka panjang yang secara substansi membentuk bagian investasi neto entitas pada entitas asosiasi atau <i>ventura</i> bersama sebagaimana dimaksud dalam PSAK 15 paragraf 38	Penerapan PSAK ini, tidak menimbulkan perubahan yang signifikan terhadap pelaporan keuangan dan pengungkapan dalam laporan keuangan
	PSAK 15 concerning "Investments in Associates and Joint Ventures",	Regulate that the firm must likewise apply PSAK 71 to financial instruments held in associates or joint ventures that are not subject to the equity method. This includes long-term interests that account for a significant portion of the entity's net investment in associates or joint ventures, as defined in PSAK 15, paragraph 38.	The application of this PSAK has had no discernible effect on financial reporting or disclosures in financial statements.

No.	Kebijakan Akuntansi Accounting Policies	Penjelasan Exegesis	Pengaruh Terhadap Laporan Keuangan Perseroan Influence on the Financial Statements of the Company
6.	PSAK 1 tentang "Penyajian Laporan Keuangan" dan PSAK 25 tentang "Kebijakan Akuntansi, Perubahan Estimasi Akuntansi dan Kesalahan: Definisi material"	Amandemen ini mengklarifikasi definisi material dengan tujuan menyelaraskan definisi yang digunakan dalam kerangka kerja konseptual dan beberapa PSAK terkait. Selain itu, juga memberikan panduan yang jelas mengenai definisi material dalam konteks pengurangan pengungkapan yang berlebihan karena perubahan ambang batas definisi material	Penerapan PSAK ini, tidak menimbulkan perubahan yang signifikan terhadap pelaporan keuangan dan pengungkapan dalam laporan keuangan
	PSAK 1 on "Financial Statement Presentation" and PSAK 25 on "Accounting Policies, Changes in Accounting Estimates, and Errors: Materiality Definition"	This amendment clarifies the material definition in order to align it with the definitions used in the conceptual framework and related PSAKs. Additionally, it provides clear guidance on the definition of material in the context of minimising over-disclosure as a result of changes to the material definition threshold.	The application of this PSAK has had no discernible effect on financial reporting or disclosures in financial statements.

Informasi Kelangsungan Usaha Business Continuous Information

Hal yang Berpotensi Berpengaruh Signifikan Terhadap Kelangsungan Usaha Bank

Selama tahun 2021, kondisi perekonomian dipengaruhi oleh pandemi Covid-19. Dalam jangka pendek menengah, pandemi diprediksi masih akan berdampak terhadap pertumbuhan ekonomi. Dampak masa depan dari wabah Covid-19 di Indonesia dan Bank Raya saat ini masih belum dapat ditentukan. Peningkatan jumlah yang terinfeksi Covid-19 yang signifikan atau wabah yang berkepanjangan dapat berdampak buruk bagi Indonesia dan industri perbankan termasuk usaha Bank Raya. Dampak pada masa depan akan sangat tergantung dari efektivitas respons kebijakan yang dilakukan oleh Pemerintah.

Assessment yang Dilakukan Manajemen

Terhadap Kelangsungan Usaha Bank Raya telah melakukan penilaian atas kemampuan Bank untuk melanjutkan kelangsungan usahanya dan berkeyakinan bahwa Bank Raya memiliki sumber daya untuk melanjutkan usahanya di masa mendatang. Bank secara berkala setiap semester melakukan pengukuran terhadap Tingkat Kesehatan Bank sesuai dengan Peraturan Otoritas Jasa Keuangan No.4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.

Berdasarkan hasil penilaian Tingkat Kesehatan Bank tahun 2021, dapat disimpulkan bahwa Bank Raya berada dalam kondisi yang baik, yaitu :

Things that have the Potential to Have a Significant Impact on the Business Continuity of the Bank

During 2021, economic conditions will be affected by the Covid-19 pandemic. In the short to medium term, the pandemic is predicted to still have an impact on economic growth. The future impact of the Covid-19 outbreak in Indonesia and Bank Raya is currently undetermined. A significant increase in the number of people infected with COVID-19 or a prolonged outbreak could have a negative impact on Indonesia and the banking industry, including the business of Bank Raya. The future impact will largely depend on the effectiveness of the policy response carried out by the Government.

Management's Assessment

Regarding Business Continuity, Bank Raya has assessed the Bank's ability to continue its business continuity and believes that Bank Raya has the resources to continue its business in the future. The Bank periodically every semester takes measurements of the Bank's Soundness Level in accordance with the Financial Services Authority Regulation No.4/POJK.03/2016 concerning Assessment of the Soundness of Commercial Banks.

Based on the results of the 2021 Bank Soundness Level assessment, it can be concluded that Bank Raya is in good condition, namely:

1. Tingkat Risiko Bank berada pada peringkat 2 - <i>Low to Moderate</i> 2. Peringkat Komposit GCG secara umum berada pada peringkat 2 - Baik 3. Peringkat Rentabilitas Bank berada pada peringkat 4 - Kurang Memadai 4. Peringkat Permodalan Bank berada pada peringkat 2 - Memadai	1. The Bank's Risk Level is ranked 2 - Low to Moderate 2. The GCG Composite Rating is generally at 2nd rank - Good 3. The Bank's Profitability Rating is ranked 4 - Less Adequate 4. The Bank's Capital Rating is ranked 2 - Adequate

Prospek Usaha Business Prospect

Pertumbuhan ekonomi pada tahun 2022 diproyeksikan akan kembali tumbuh positif yaitu di kisaran 5,2% dan inflasi tetap dapat dijaga dikisaran 3%. Faktor utama yang akan mempengaruhi proyeksi pertumbuhan ekonomi adalah penanganan Covid-19, percepatan vaksinasi dan stimulus fiskal untuk melanjutkan program Pemulihan Ekonomi Nasional (PEN) yang diberikan dalam rangka pemulihan ekonomi nasional. Adapun faktor eksternal yang mempengaruhi proyeksi pertumbuhan ekonomi Indonesia adalah tercapainya pertumbuhan ekonomi global karena Indonesia merupakan bagian dari *supply chain* ekonomi global. Sehingga faktor-faktor yang patut dicermati karena dapat menjadi penentu pertumbuhan ekonomi Indonesia pada tahun 2022 adalah eskalasi Covid-19, ketersediaan vaksin, efektivitas stimulus dan tensi geopolitik global. Keberlangsungan sektor usaha juga menjadi fokus Pemerintah, serangkaian insentif fiskal telah diberikan untuk meningkatkan kinerja sektor usaha.

Prospek transaksi ekonomi dan keuangan digital terus tumbuh seiring meningkatnya akseptasi dan preferensi masyarakat untuk berbelanja daring, perluasan dan kemudahan sistem pembayaran digital, serta akselerasi digital banking. Nilai transaksi Uang Elektronik sampai dengan triwulan III-2021 meningkat 45,05% (yoy) menjadi Rp209,8 triliun. Demikian pula, nilai transaksi *digital banking* sampai dengan triwulan III-2021 meningkat 46,72% (yoy) menjadi Rp28,7 triliun. Bank Indonesia akan berupaya mempercepat digitalisasi sistem pembayaran untuk mendukung akselerasi ekonomi keuangan digital nasional. Berbagai program digitalisasi sistem pembayaran, seperti perluasan QRIS, Standar Nasional Open API Pembayaran (SNAP) dan reformasi regulasi, serta rencana implementasi BI-FAST terus diakselerasi. Hal ini sejalan dengan model bisnis baru dan aspirasi Perseroan sebagai *Digital Attacker* BRI Group. Salah satu upaya Perseroan untuk masuk ke *digital ecosystem* dimulai dengan aktif melakukan kolaborasi dengan beberapa *Fintech*, mengembangkan *digital banking* baik dari sisi *saving* maupun *lending*.

Economic growth is expected to return to positive territory in 2022, hovering around 5.2%, while inflation is expected to remain around 3%. The primary elements affecting economic growth projections include how Covid-19 is handled, vaccine acceleration, and fiscal stimulus to maintain the National Economic Recovery (PEN) initiative. External factors affecting Indonesia's economic growth projections include world economic growth, as Indonesia is a component of the global economic supply chain. Thus, the issues that should be monitored because they have the potential to affect Indonesia's economic growth in 2022 are the Covid-19 escalation, vaccine availability, stimulus effectiveness, and global geopolitical concerns. The Government is likewise focused on the business sector's sustainability; hence, a variety of fiscal incentives have been implemented to boost the sector's performance.

The promise of digital economic and financial activities continues to develop as public acceptance and desire for online purchasing increases, digital payment systems expand and become more convenient, and digital banking accelerates. Up to quarter III-2021, the value of electronic money transactions climbed 45.05% year on year to IDR 209.8 trillion. Similarly, the value of digital banking transactions climbed by 46.72% (yoy) to IDR 28.7 trillion up to quarter III-2021. Bank Indonesia will work to speed the digitalization of the payment system in order to assist the country's digital financial market in growing. Numerous payment system digitalization initiatives, including the extension of QRIS, the National Open API Payment Standard (SNAP), and regulatory reforms, as well as the BI-FAST implementation plan, are being accelerated. This is consistent with the Company's new business model and aim to be the BRI Group's Digital Attacker. One of the Company's attempts to penetrate the digital ecosystem is to collaborate actively with numerous Fintechs on the development of digital banking, both for saving and lending.

Tinjauan Pendukung Bisnis

Business Support Overview

Human Capital

Human Capital

Transformasi bisnis yang dilakukan Bank Raya di tahun 2021 menjadi tantangan tersendiri bagi Bank, khususnya dalam aspek pengelolaan *Human Capital* (HC). Perubahan model bisnis Bank membutuhkan dukungan dari HC dengan karakter yang berbeda dari model bisnis sebelumnya. Hal ini menjadi tantangan utama bagi Bank Raya.

Tantangan tersebut menjadi semakin kompleks karena terjadi dimasa pandemi Covid-19 yang telah mengubah tatanan kehidupan sosial masyarakat secara umum. Namun demikian, Bank Raya tetap berkomitmen dan berkeyakinan bahwa dapat dihadapi dengan baik dan memberikan hasil yang optimal untuk mendukung pencapaian tujuan Bank.

Untuk menghadapi tantangan tersebut, Divisi *Human Capital* yang merupakan penanggung jawab dalam pengelolaan HC di Bank Raya telah menetapkan sejumlah program prioritas yang dijalankan di tahun 2021, yaitu:

Sejalan dengan proses transformasi dimana aspek sumber daya manusia merupakan salah satu aspek penting untuk mencapai tujuan transformasi. Strategi inisiatif Divisi *Human Capital* dalam mendukung transformasi bisnis adalah :

- **Strengthening HR Function**, memperkuat peranan HR sebagai *collaborator, business partner & change driver*
- **Creative Talent Attraction**, melakukan rekrutmen dan seleksi calon Pekerja dengan cara-cara yang kreatif (*Talent Hiring/Pro Hiring, Rekrutmen Reguler, Partnership, Talent Scouting & Penugasan BRI*)
- **Talent Retention**, perlunya dilakukan program *retention* untuk meningkatkan engagement dan produktivitas Pekerja
- **Talent Development**, menyelenggarakan program pengembangan kapabilitas *talent* secara paripurna
- **Culture Transformation**, melakukan program internalisasi dan aktivasi *New Culture* Bank Raya dengan tetap berpedoman pada *core values* AKHLAK.

Roadmap Human Capital

Bank Raya menyadari, transformasi bisnis yang dilakukan Bank bukanlah proses yang dapat selesai dalam waktu yang singkat. Menyadari hal tersebut, Divisi HC telah menyusun *Roadmap Human Capital* Bank Raya periode 2021-2025

Roadmap Human Capital Bank Raya telah diselaraskan dengan rencana bisnis dan tujuan jangka panjang Bank Raya.

Bank Raya's business transformation in 2021 will be a challenge, particularly in terms of human capital management (HC). Changes to the Bank's business model need assistance from HC that is distinct from the prior model. This is a significant obstacle for Bank Raya.

These difficulties are growing more complicated as a result of the Covid-19 epidemic, which has altered the social order in general. Bank Raya, on the other hand, remains dedicated and thinks that it can be managed effectively and provide optimum outcomes in support of the Bank's aims.

To address these issues, the Human Capital Division, which is responsible for managing human capital at Bank Raya, has identified a number of priority initiatives for implementation in 2021, including the following:

In accordance with the transformation process, where human resource management is a critical component in achieving the transformation objectives. The Human Capital Division's initiative strategies for corporate transformation include the following:

- **Strengthening HR Function**, emphasising HR's position as a collaborator, business partner, and change driver.
- **Creative Talent Attraction**, recruiting and choosing potential personnel in novel methods (*Talent Hiring/Professional Hiring, Regular Recruitment, Partnerships, Talent Scouting, and BRI Assignments*).
- **Talent Retention**, boosting staff engagement and productivity, a retention programme is required.
- **Talent Development**, implementing a thorough talent development programme.
- **Culture Transformation**, implementing an internalisation and activation programme for Bank Raya's New Culture while adhering to AKHLAK's key principles.

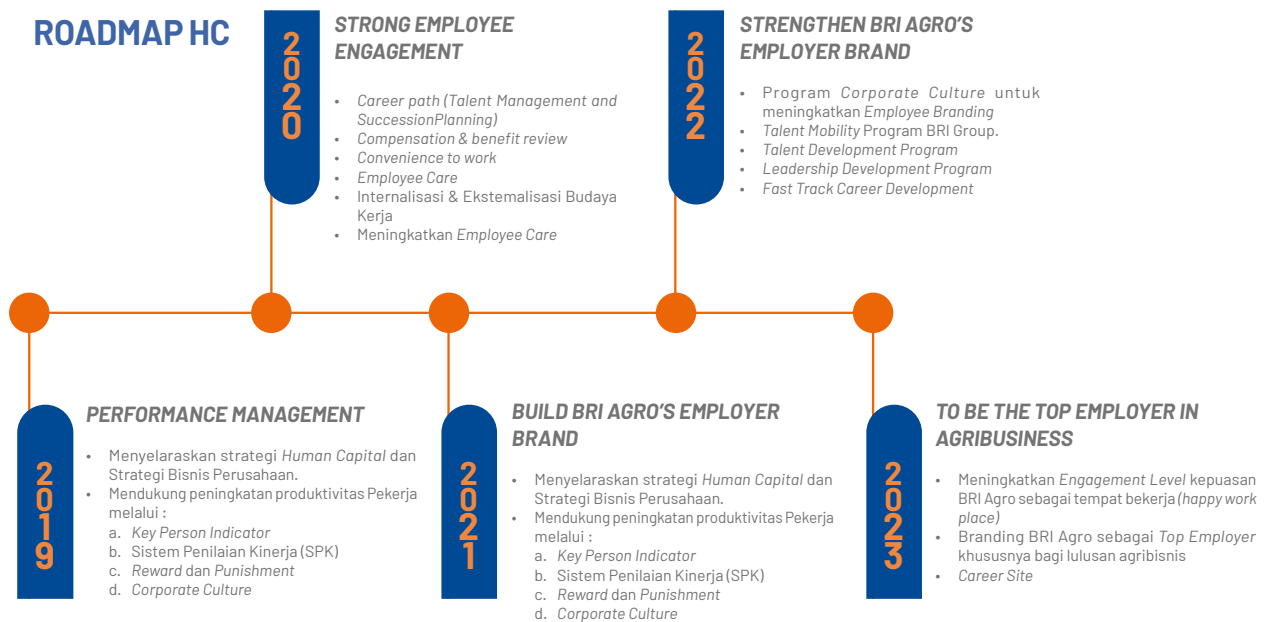
Human Capital Roadmap

Bank Raya recognises that the business transformation process it is through is not a quick one. Recognizing this, the Human Capital Division of Bank Raya has developed a Human Capital Roadmap for the period 2021-2025.

Bank Raya's Human Capital Roadmap has been developed in accordance with the company's business strategy and long-term objectives.

Bank Raya melakukan Perencanaan strategis *Human Capital* yang dituangkan dalam *HC Roadmap 2021* yang menekankan *Build Bank Raya Employee Value Proposition* di mana Bank Raya berupaya mendukung peningkatan produktivitas Pekerja melalui *Key Performance Indicator*, SMK, pemberian *reward* bagi Pekerja berupa bonus, insentif, maupun MESOP dan pemberian *Punishment* bagi Pekerja yang melakukan pelanggaran disiplin sesuai dengan ketentuan yang berlaku baik internal maupun eksternal Perusahaan, dan juga Divisi *Human Capital* berperan aktif sebagai wadah untuk membangun *Corporate Culture* melalui berbagai program *Culture Activation Program* (CAP)

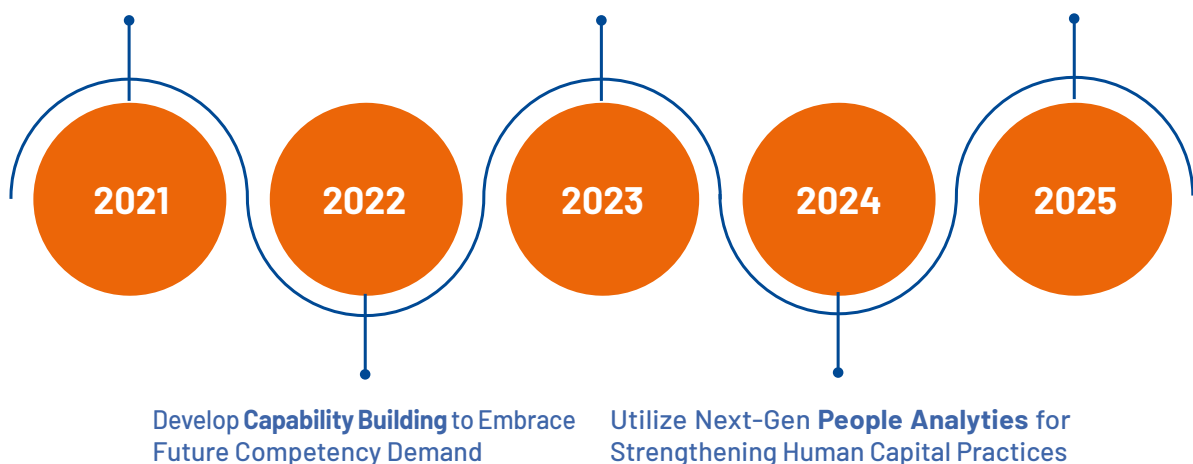
Bank Raya conducts human capital strategy planning in accordance with the *HC Roadmap 2021*, which highlights the need of enhancing staff productivity via *Key Performance Indicators*, SMK, and delivering rewards to workers in the form of bonuses, incentives, as well as M/ESOP and grants. Employees who violate discipline are subject to disciplinary action in accordance with applicable regulations, both internal and external to the Company, and the *Human Capital* Division serves as a forum for the development of *Corporate Culture* through various *Culture Activation Program* (CAP) programmes.



Strengthening of Human Capital

Leverage Digital Mindset to Accomplish Employee Value Proposition

Becoming the best place to grow in fintech industri



Pengembangan Organisasi

Dalam rangka menunjang pencapaian visi dan misi Bank untuk mencapai target yang telah ditetapkan dalam Rencana Bisnis Bank maka perlu dipastikan dukungan struktur organisasi yang efisien dan efektif serta dinamis yang selalu siap mengikuti pertumbuhan usaha Bank, serta dukungan Sumber Daya Manusia (SDM) yang handal dengan integritas tinggi serta memiliki kompetensi yang mumpuni.

Sehubungan dengan hal tersebut maka perlu direncanakan pengembangan organisasi, sistem informasi manajemen maupun pengembangan SDM pada tahun 2021, dimana Bank Raya berencana untuk membangun *Strategic Business Unit* (SBU) yang fokus secara *end-to-end* fokus di bisnis digital untuk mendukung pencapaian target dan akselerasi bisnis.

Pengembangan organisasi dilakukan dalam rangka meningkatkan kualitas dan produktivitas Sumber Daya Manusia, baik dari segi *leadership* maupun kompetensi, dan memberikan penghargaan kepada Sumber Daya Manusia.

Dalam pengembangan organisasi di tahun 2021, perubahan yang terjadi dalam Struktur Organisasi Bank Raya adalah :

1. Penggabungan Direktorat *Risk Management* & Direktorat *Legal Compliance & Human Capital* menjadi Direktorat *Enterprise Risk Management, Compliance & Human Resources*
2. Pemisahan Direktorat Bisnis menjadi Direktorat Retail Agri & Pendanaan serta Direktorat Digital Bisnis
3. Penambahan Direktorat *Credit Risk* yang dipimpin oleh pejabat setingkat *Senior Executive Vice President* (SEVP). Tugasnya meliputi:
 - a. Mensupervisi Divisi Analisis Risiko Kredit yang merupakan pemecahan Divisi Analisis Risiko & Operasional Kredit di bawah Direktorat Keuangan & Operasional. Divisi Operasional Kredit tetap berada di bawah supervisi Direktur Keuangan & Operasional.
 - b. Mensupervisi Divisi Restrukturisasi & Penyelamatan Kredit yang semula di bawah Direktur Utama dipindahkan menjadi di bawah supervisi SEVP *Credit Risk*.

Organisation Development

To assist the Bank in achieving its vision and mission and meeting the targets outlined in its Business Plan, it is necessary to ensure the support of an efficient, effective, and dynamic organisational structure that is always prepared to grow with the Bank's business, as well as the support of trustworthy Human Resources (HR) with integrity and high competence.

In this regard, it is necessary to plan for organisational development, management information systems development, and human resource development in 2021, when Bank Raya intends to establish a Strategic Business Unit (SBU) focused on end-to-end digital business to assist in achieving and accelerating targets. business.

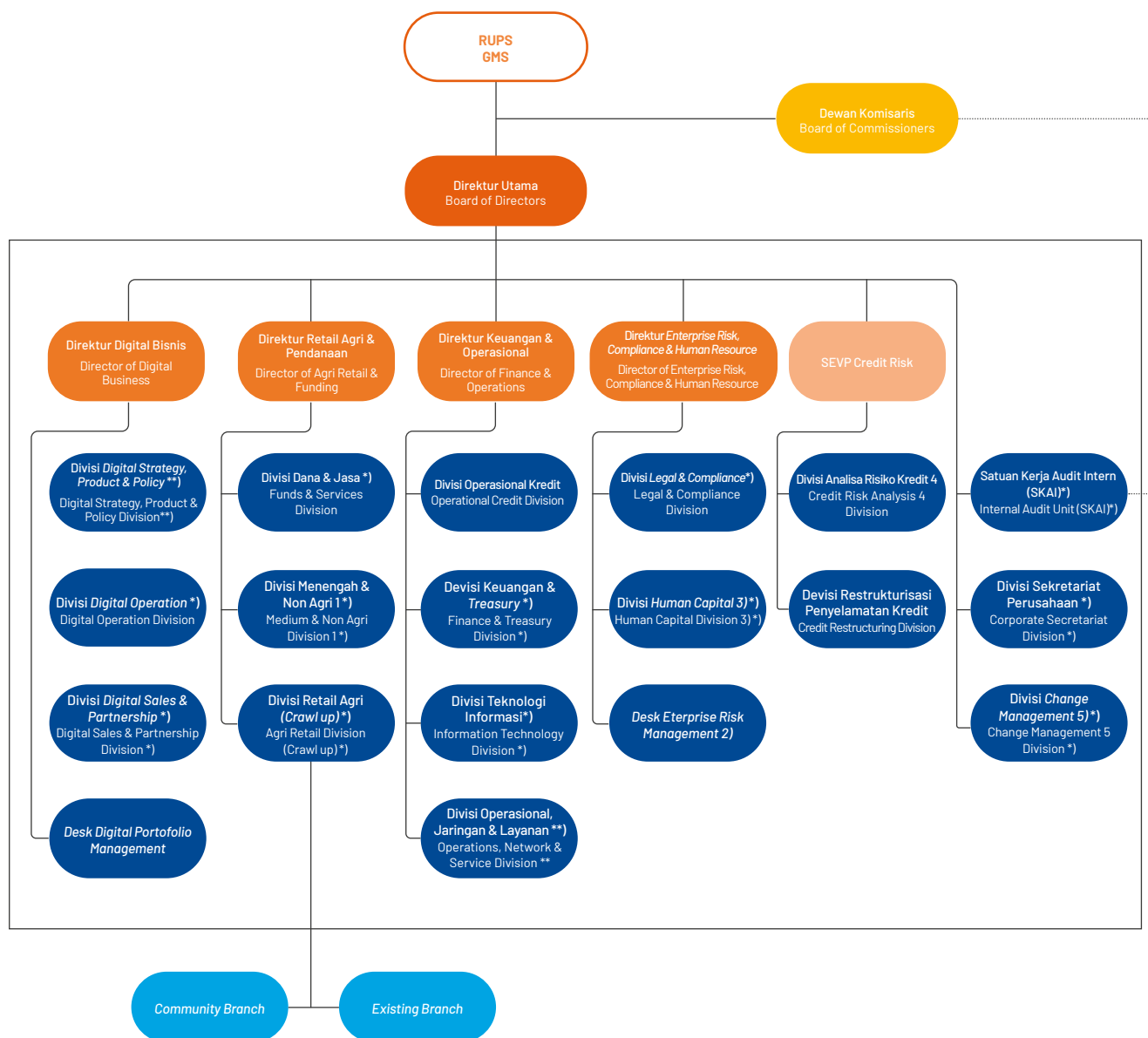
Organisational development is undertaken to enhance the quality and productivity of Human Resources, both in terms of leadership and competence, as well as to recognise outstanding Human Resources.

Bank Raya's organisational structure will undergo the following changes in 2021:

1. Merger of the Risk Management Directorate and the Legal Compliance and Human Capital Directorate to form the Directorate of Enterprise Risk Management, Compliance, and Human Resources.
2. Division of the Business Directorate into the Retail Agribusiness and Financing Division and the Digital Business Division.
3. Establishment of a Credit Risk Directorate headed by a Senior Executive Vice President (SEVP). Among his responsibilities are the following:
 - a. Supervise the Credit Risk Analysis Division, which is a sub-division of the Finance & Operations Directorate's Credit Risk Analysis & Operations Division. The Director of Finance & Operations continues to supervise the Credit Operations Division.
 - b. Supervise the Credit Restructuring and Rescue Division, which was previously overseen by the President Director, was transferred to the SEVP Credit Risk.

Berdasarkan perubahan tersebut, maka Struktur Organisasi Bank Raya revisi terakhir berdasarkan No. Kpts. B. 237/Dir.04.02/CMG/06/2021 adalah sebagai berikut:

The following changes have been made to the latest revised Bank Raya organisational structure, which is based on No. Kpts. B. 237/Dir.04.02/CMG/06/2021:



Rekrutmen Karyawan

Untuk menunjang pencapaian tujuan usahanya, Bank membutuhkan HC yang handal dan berkualitas. Karena itu, di tengah persaingan dengan berbagai perusahaan baik di industri perbankan maupun industri lainnya, Bank terus dihadapkan pada tantangan merekrut karyawan yang tepat, sesuai dengan nilai perusahaan dan kemampuan yang dibutuhkan.

Dalam menjaring talenta terbaik untuk menyesuaikan dengan kebutuhannya, Bank menitikberatkan kepada karyawan yang berkualitas, berintegritas, mempunyai kemampuan beradaptasi pada perubahan (*agile*), serta memiliki kompetensi yang unggul. Untuk itu, Bank menjalankan program rekrutmen secara komprehensif dengan mengedepankan prinsip keterbukaan, kewajaran, dan kesetaraan.

Proses rekrutmen di Bank Raya dilakukan melalui beberapa pola, antara lain pola rekrutmen bagi Pelaksana, Staf atau disebut calon pimpinan (yang dilakukan melalui Program BFLP (*BRilian Future Leadership Program*) bersama BRI group), serta untuk jabatan-jabatan tertentu dilakukan melalui *Talent Hiring*. Dalam melakukan Rekrutmen *Pro Hire* Eksternal khususnya untuk level Kepala Bagian sampai dengan Kepala Divisi yang mengacu pada SK No. Kpts.34/Dir.01.02/Human Capital/IX/2017 tanggal 29 September 2017 tentang Ketentuan Penerimaan dan Penempatan Pekerja melalui Jalur Khusus (*Special Hiring*) Revisi Pertama.

Di tahun 2021, Perseroan merekrut sebanyak 157 karyawan baru, dengan rincian sebagai berikut: [GRI 401-1]

Jenis Kelamin Gender	Babyboomers Babyboomers	Gen X Gen X	Gen Y Gen Y	Gen Z Gen Z	D3 ke bawah D3 below	D4 ke atas D4 above	Staff ke bawah Staff below	Supervisor ke atas Supervisor above
Pria Male	0	4	56	26	9	77	65	21
Wanita Female	0	0	31	40	10	61	66	5
Jumlah Total	0	4	87	66	19	138	131	27

Pengembangan Karir dan Manajemen Talenta

Salah satu kunci strategi retensi HC yang diterapkan Bank adalah dengan implementasi program manajemen talenta yang terstruktur, terintegrasi, dan komprehensif untuk mencapai keunggulan kompetitif, sasaran strategis dan kebutuhan bisnis masa depan, di samping untuk mengelola dan mempertahankan talenta terbaiknya.

Pelaksanaan manajemen talenta diawali dengan menentukan, mengukur, mengembangkan, memantau hingga mempertahankan karyawan yang bertalenta, di mana implementasinya dilakukan secara terintegrasi dengan Rencana Bisnis Bank, baik jangka pendek maupun jangka panjang.

Recruitment of Employees

To support the Bank's business goals, it needs dependable and high-quality HC. Thus, in the face of competition from a variety of organisations in both the banking and non-banking sectors, the Bank continues to confront the problem of attracting the appropriate individuals who share the company's values and possess the necessary competences.

When it comes to hiring the finest personnel for their requirements, the Bank prioritises candidates that are competent, have integrity, are adaptable to change (*agile*), and has outstanding competences. To that aim, the Bank maintains a rigorous recruiting policy that places a premium on transparency, justice, and equity.

Bank Raya's recruitment process is structured in several ways, including the recruitment pattern for executives, staff, and so-called leadership candidates (which is conducted in conjunction with the BRI group through the BFLP Program (*BRilian Future Leadership Program*), as well as for certain positions through *Talent Hiring*. In conducting external pro-hire recruitment, particularly at the Head of Division level and up to the Head of Division, which refers to the Decree No. Kpts.34/Dir.01.02/Human Capital/IX/2017 dated September 29, 2017 regarding Provisions for Acceptance and Placement of Workers via First Revision Special Hiring.

In 2021, the Company hired 157 new employees, as follows: [GRI 401-1]

Career Development and Talent Management

One of the Bank's primary strategies for HC retention is the establishment of a systematic, integrated, and comprehensive talent management programme with the goal of achieving competitive advantage, strategic objectives, and future business requirements, as well as managing and retaining the best talent.

Talent management begins with discovering, measuring, developing, monitoring, and retaining talented individuals, all of which are integrated into the Bank's short- and long-term business strategies.

Strategi Divisi *Human Capital* dalam mengelola Pekerja melalui *Talent Management*. *Talent Management* merupakan proses *end to end* dimulai dari perencanaan, merekrut, mengembangkan, mengelola hingga proses separation Pekerja di Perusahaan. *Talent Management* terbagi menjadi 5 (lima) tahapan yaitu:

1. *Attraction*

Talent Attraction merupakan proses untuk menarik *Talent* yang berasal dari sumber intern dan/atau ekstern untuk bekerja di Perusahaan melalui mekanisme *Talent Channel* dan *Talent Source* yang kreatif dan inovatif. Program attraction Divisi *Human Capital* pertama dengan meningkatkan *employer branding*, kedua dengan *sourcing & database management* dengan melakukan rekrutmen reguler maupun magang, serta yang ketiga dengan *sourcing channel* dengan melakukan *job posting* melalui *linkedin*.

2. *Identification and Selection*

Talent Identification, yaitu proses identifikasi *Talent* yang ada di dalam Perusahaan yang didasarkan pada nilai Kinerja (*Performance*) dan Kapasitas (*Capacity*) serta aspirasi *Talent*. Divisi *Human Capital* melakukan *mapping* Pekerja berdasarkan data hasil *assessment* dan data nilai SMK dengan kriteria tertentu menjadi kelompok-kelompok *talent*. Selanjutnya dilakukan *Talent Selection*, yaitu proses seleksi serta *Talent Review* yang dilakukan oleh *Talent Committee* dalam rangka mempersiapkan *Talent Pool*, *Talent Cluster*, dan *List of Successors*.

3. *Development and Succession*

Talent Development, yaitu proses pengembangan *Talent* guna mempersiapkan serta mengakselerasi kesiapan *Talent* untuk menduduki Jabatan yang lebih tinggi. *Talent Development* dilakukan untuk mengembangkan hal-hal seperti *Character*, *Professional Competencies*, *Leadership Competencies*, maupun *Technical/Functional Competencies*. *Talent Development* dapat dilakukan dengan cara *Formal Learning* (*training*, sertifikasi, dll), *Coaching*, *Mentoring* dan *Counselling*, serta *On The Job Learning by Experience* (*on the job* ke BRI). Sedangkan *Talent Succession*, yaitu proses penempatan *Talent* pada suatu Jabatan serta Perencanaan Suksesi (*Succession Planning*) untuk Jabatan di Perusahaan, termasuk *Key Strategic Positions*

4. *Retention*

Retensi merupakan kemampuan Perusahaan untuk mempertahankan karyawan potensial yang dimiliki perusahaan untuk tetap loyal terhadap perusahaan. hal-hal yang dilakukan yaitu membuat suasana kerja yang nyaman, program kesejahteraan bagi Pekerja serta program-program *employee care* lainnya.

5. *Separation*

Dengan proses manajemen talenta di Bank Raya yang baik, diharapkan dapat memberi persepsi positif dan nilai bagi Pekerja yang telah pemutusan hubungan kerja baik secara *normal separation* (*pensiun*, habisnya masa kontrak, atau meninggal), *forced separation* (*indisipliner*) atau *early retirement* (*pensiun* sebelum masanya)

The talent management plan for the Human Capital Division. Talent management is a holistic process that starts with the planning, recruiting, development, and administration of staff and concludes with their departure from the organisation. Talent management is divided into five (five) stages, the first of which is as follows:

1. *Attraction*

Talent Attraction is the process of luring talented people from internal and/or external sources to work for the Company via the deployment of novel and innovative *Talent Channel* and *Talent Source* strategies. The Human Capital Division's first attraction campaign focuses on employer branding; the second on sourcing and database maintenance via regular recruitment and internships; and the third on sourcing channels through job postings on LinkedIn.

2. *Identification and Selection*

Talent Identification is the practise of finding prospective workers inside an organisation based on their performance and capacity values and objectives. Human Capital divided individuals into talent groups based on assessment results and SMK value data that satisfied required criteria. Additionally, *Talent Selection* is done, namely the *Talent Committee's* selection procedure and *Talent Review*, in order to build the *Talent Pool*, *Talent Cluster*, and *List of Successors*.

3. *Development and Succession*

Talent Development is precisely concerned more the process of preparing and expediting candidates for higher-level positions. Through talent development, character, professional competencies, leadership competencies, and technical/functional competencies are all fostered. Formal education (*training*, certification, etc.), coaching, mentoring, and counselling, and on-the-job learning via experience are all effective methods for developing talent (*on the job* to BRI). Meanwhile, *Talent Succession*, defined as the process of placing talent in roles and preparing for succession in Company positions, including *Key Strategic Positions*,

4. *Retention*

The term "retention" refers to a business's ability to convince potential employees to remain loyal to the organisation. The organisation makes measures to provide a pleasant work environment, employee welfare programmes, and other forms of employee care.

5. *Separation*

Bank Raya hopes that by implementing a strong talent management process, it will be able to maintain a positive perception and value for employees who are terminated, whether due to normal separation (*retirement*, contract expiration, or death), forced separation (*indiscipline*), or early retirement (*retiring before retirement*).

Penilaian Kinerja

Penilaian kinerja pekerja merupakan mekanisme untuk memberikan apresiasi terhadap kinerja pekerja selama bekerja di perusahaan. Mekanisme ini untuk mewujudkan keadilan, dukungan, serta menetapkan target pencapaian kepada seluruh pekerja. Bagi pekerja yang tercatat memiliki kinerja baik, maka akan mendapatkan penghargaan berupa insentif atau tunjangan kinerja serta mendapatkan kesempatan karir berupa Kenaikan *Person Grade*/Promosi Jabatan. Sebaliknya, pekerja dengan kinerja yang kurang baik akan mendapatkan peringatan. Kajian dilakukan secara adil berdasarkan prestasi kerja pekerja tanpa membedakan latar belakang individu.

Bank Raya telah memiliki sistem penilaian pekerja yang berfokus pada kinerja pekerja berdasarkan *Key Performance Indicator* (KPI) yang telah ditetapkan. Setiap tahun, Perseroan menetapkan target yang dituangkan dalam RKAP Perseroan. Dari RKAP, Perseroan menuangkannya ke dalam KPI Unit atau Direktorat, yang selanjutnya diturunkan ke dalam KPI Individu. Penyusunan KPI dirancang untuk mewujudkan tujuan Perseroan tanpa mengabaikan tujuan individu karyawan.

Berdasarkan penilaian pekerja, selama tahun 2021 Bank Raya telah melakukan promosi terhadap pekerja, sebagai berikut.
[GRI 404-3]

Evaluation of Performance

Employee performance assessment is a process for expressing gratitude for employees' performance while employed by the organisation. This method is intended to administer justice, give assistance, and establish accomplishment goals for all employees. Employees that demonstrate superior performance will get recognition in the form of incentives or performance allowances, as well as career advancement chances in the form of Person Grade Increases/Position Promotions. On the other hand, non-perform employee will be punished. The survey is done honestly, evaluating employees' performance without regard for their particular backgrounds.

Bank Raya already has an employee assessment system in place that is based on predefined Key Performance Indicators (KPI). Each year, the Company establishes aims as described in its Company's Work Plan and Budget (RKAP). The Company divides the RKAP into Unit KPIs or Directorates, which are subsequently subdivided into Individual KPIs. KPIs are developed with the intention of achieving the Company's objectives while also taking into account the specific objectives of personnel.

According to employee evaluations, Bank Raya promoted the following workers in 2021. [GRI 404-3]

No.	Jenis Promosi Promotion Type	Jumlah Total
1.	Kenaikan PG PG Increase	149
2.	Kenaikan JG/PG JG/PG Increase	48
3.	Promosi SOL SOL Promotion	1
4.	Promosi Wapinca/Wakabag Branch Deputy Head/Division Deputy Head Promotion	2
5.	Promosi Pemimpin Cabang Pembantu Sub-Branch Head Promotion	2
6.	Promosi Pemimpin Cabang/Kepala Bagian Branch Head/Division Head Promotion	7
7.	Promosi Wakil Kepala Divisi/Kepala Desk/Kepala Bidang Division Deputy Head /Desk Head/Division Head Promotion	8
8.	Promosi Kepala Divisi Division Head Promotion	4
Jumlah Total		221

Selain promosi, di tahun 2021 juga telah dilakukan demosi terhadap 2 orang karyawan dikarenakan hukuman disiplin, dan rotasi sebanyak 19 orang pekerja, yang umumnya disebabkan oleh kebutuhan perusahaan (pengisian formasi) dan dalam rangka penyegaran karyawan.

Pendidikan dan Pelatihan

Bank Raya meyakini bahwa untuk memiliki keunggulan yang kompetitif, HC harus memiliki keahlian dan kompetensi yang dibutuhkan oleh Bank, baik dalam rangka mendukung strategi dan sasaran bisnis saat ini maupun masa yang akan mendatang. Untuk itu, Bank mengembangkan kompetensi HC melalui pendekatan terintegrasi yang dirancang dengan memperhatikan kebutuhan individu karyawan, organisasi, dan sasaran bisnis dalam jangka pendek maupun jangka panjang. [GRI 103-1]

Bank Raya fokus pada pengembangan kompetensi karyawan yang diselenggarakan melalui program pendidikan dan pelatihan, baik yang dijalankan secara internal maupun eksternal. Sejalan dengan tantangan yang dihadapi Bank dan yang dibutuhkan industri perbankan ke dalam materi program pendidikan dan pelatihan. Program tersebut juga disusun dengan memperhatikan efektivitas, efisiensi, dampak, dan tujuan program pengembangan yang ingin dicapai.

Selain itu, Bank juga memandang pengembangan kompetensi *Human Capital* ini sebagai bentuk investasi jangka panjang yang memberikan dampak nyata bagi peningkatan kinerja Perseroan di masa mendatang. [GRI 103-2]

Bank melakukan pengembangan *Human Capital* yang berbasis kompetensi yang secara umum ditujukan untuk mendukung pekerja dalam menjalankan pekerjaannya, yang pada akhirnya dapat membantu Bank mewujudkan visi dan misi, yang tentunya membutuhkan peran *Human Capital* untuk mendukung strategi yang telah ditetapkan tersebut. [GRI 103-3]

Pada tahun 2021, Bank Raya telah menyelenggarakan program pendidikan dan pelatihan kepada 100% karyawan. Dalam program tersebut, setiap karyawan memiliki rata-rata jumlah hari pelatihan mencapai 2 hari per karyawan. [GRI 404-1]

Ada pun program pendidikan dan pelatihan yang diselenggarakan tahun 2021 adalah sebagai berikut: [GRI 404-2]

1. Orientasi BFLP Batch 2
2. Pendidikan Jarak Jauh *Development Wapinca* (Kerjasama dengan BRI Corpu)
3. Pendidikan Jarak Jauh *Development Pincapem* (Kerjasama dengan BRI Corpu)
4. Forum *Group Discussion* Transformasi BRI Agro Tahun 2021
5. Pendidikan Khusus Profesi Advokat
6. Pendidikan Transformation *Digital Mindset*
7. Sosialisasi *Checklist* Berkas Kredit

Along with promotions, there were two demotions due to disciplinary actions and the rotation of 19 employees in 2021, which were mostly due to business demands (filling in formations) and to refresh staff.

Education and Training

Bank Raya believes that in order to be competitive, HC must possess the required skills and capabilities to support the Bank's current and future business ambitions and objectives. To accomplish this goal, the Bank develops HC capabilities via an integrated approach that considers the particular needs of people, organisations, and short- and long-term business goals. [GRI 103-1]

Bank Raya puts an emphasis on employee capability development via internal and external education and training programmes. In compliance with the Bank's mandates and the banking sector's educational and training material needs. Additionally, the programme is designed with the development program's effectiveness, efficiency, impact, and objectives in mind.

Additionally, the Bank views human capital development as a long-term investment that has a direct impact on the Company's future performance. [GRI 103-2]

The Bank develops competency-based Human Capital with the objective of aiding employees in doing their duties, which in turn may aid the Bank in realising its vision and mission, both of which need Human Capital to support the established strategy. [GRI 103-3]

As of 2021, Bank Raya has planned education and training programmes for all of its employees. Throughout the course, each employee gets an average of two days of training. [GRI 404-1]

In 2021, the following education and training programmes will be available: [GRI 404-2]

1. BFLP Batch 2 Orientation
2. Distance Education Development of Branch Deputy Head (Cooperation with BRI Corpu)
3. Distance Education Development of Sub-Branch Head (Cooperation with BRI Corpu)
4. Forum Group Discussion of BRI Agro Transformation in 2021
5. Special Education for the Advocate Profession
6. Digital Mindset Transformation Education
7. Dissemination of Credit File Checklist

8. *Workshop Nasional PHK dan Pesangon serta Pengesahan PP dan PKB melalui sistem Aplikasi Elektronik e_pp dan e_PKB dalam Undang-undang cipta kerja*
 9. *Sosialisasi Affirmative Covenant (Maintenance & Report Monitoring Jatuh Tempo Dokumen)*
 10. *Webinar Creating Great Days at Work*
 11. *Sosialisasi Asesmen Pekerja*
 12. *Pendidikan Jarak Jauh Development Pinca (Kerjasama dengan BRI Corpu)*
 13. *Sosialisasi Ketentuan KPR Sejahtera 2021*
 14. *Pendidikan Bidang Tugas Legal, Compliance & Anti Money Laundering*
 15. *Pendidikan IHT Special Request Pelatihan Wawancara Kompetensi BRI Terbaru (BFLP) - Divisi HCD Batch 1 & 2 th 2021 menggunakan metode Distance Learning Batch 1*
 16. *Rise of 4.0 Continuous Performance Management & OKR*
 17. *Webinar BRI One Culture & Employee Value Proposition*
 18. *Pendidikan IHT Special Request Pelatihan Wawancara Kompetensi BRI Terbaru (BFLP) - Divisi HCD Batch 1 & 2 th 2021 menggunakan metode Distance Learning Batch 2*
 19. *Pendidikan Pembekalan Treasury*
 20. *Pendidikan Pembekalan Sertifikasi Manajemen Risiko Level 1*
 21. *Pendidikan Pembekalan Sertifikasi Manajemen Risiko Level 2*
 22. *Pendidikan Pembekalan Sertifikasi Treasury*
 23. *Pendidikan Uji Sertifikasi Treasury*
 24. *Pendidikan Online Mengenai Bidang Tugas Divisi Legal & Compliance*
 25. *Pendidikan Pembekalan Sertifikasi Kepatuhan Level 1*
 26. *Pendidikan Uji Sertifikasi Treasury*
 27. *Pendidikan Uji Sertifikasi Kepatuhan*
 28. *Pendidikan Pembekalan Sertifikasi Kepatuhan Level 2*
 29. *Pendidikan Bidang Tugas Legal, Compliance & Anti Money Laundering*
 30. *Pendidikan Sertifikasi Auditor Hukum*
 31. *Training CCNA*
 32. *Webinar Fighting with HC Emerging Issues*
 33. *Webinar Tax Forum BUMN 2021 tentang Implementasi UU Omnibus Law Cipta Kerja Klaster Perpajakan berdasarkan UU No. 11/2020, PP 09/2021, PMK-18/2021*
 34. *Webinar Efektivitas Pengawasan Dewan Komisaris dalam Menjaga Kepatuhan Bank dalam Menuju Era Pengaturan Principle Based*
 35. *Refreshment Manajemen Risiko Dewan Komisaris*
 36. *Workshop Bancassurance AM Lenteraku*
 37. *Awareness Training ISO 37001: 2016*
 38. *Pendidikan Accelerate Your People Management Skills*
 39. *Risk Management refreshment Program: Strategi Cerdas Pengelolaan Risiko Kredit & Risiko Operasional di Masa Pandemi Covid 19*
 40. *Pembekalan Sertifikasi Manajemen Risiko Level 1*
 41. *Workshop Undang -undang Cipta Kerja No. 11 th 2020*
8. *National Workshop on Layoffs and Severance Pay as well as Ratification of PP and PKB through the Electronic Application system e_pp and e_PKB in the work copyright law*
 9. *Dissemination of the Affirmative Covenant (Maintenance & Monitoring Report on Maturity of Documents)*
 10. *Webinar Creating Great Days at Work*
 11. *Dissemination of Worker Assessment*
 12. *Distance Education Development of Branch Head (Cooperation with BRI Corpu)*
 13. *Dissemination of the 2021 Prosperous Mortgage Provisions*
 14. *Education in Legal, Compliance & Anti Money Laundering*
 15. *Education IHT Special Request Latest BRI Competency Interview Training (BFLP) - HCD Division Batch 1 & 2 of 2021 using the Distance Learning Batch 1 method*
 16. *Rise of 4.0 Continuous Performance Management & OKR*
 17. *BRI One Culture & Employee Value Proposition Webinar*
 18. *Education IHT Special Request for Latest BRI Competency Interview Training (BFLP) - HCD Division Batch 1 & 2 of 2021 using the Distance Learning Batch 2 method*
 19. *Treasury Debriefing Education*
 20. *Education Providing Risk Management Certification Level 1*
 21. *Education of Risk Management Certification Level 2*
 22. *Education of Treasury Certification*
 23. *Treasury Certification Test Education*
 24. *Online Education Regarding Legal & Compliance Division's Duties*
 25. *Education Provide Compliance Certification Level 1*
 26. *Treasury Certification Test Education*
 27. *Education Compliance Certification Test*
 28. *Education Provide Compliance Certification Level 2*
 29. *Education in Legal, Compliance & Anti Money Laundering*
 30. *Legal Auditor Certification Education*
 31. *CCNA training*
 32. *Webinar Fighting with HC Emerging Issues*
 33. *SOEs 2021 Tax Forum Webinar on the Implementation of the Omnibus Law on Tax Cluster Job Creation based on Law no. 11/2020, PP 09/2021, PMK-18/2021*
 34. *Webinar on the Effectiveness of the Board of Commissioners' Supervision in Maintaining Bank Compliance in Towards the Era of Principle Based Regulation*
 35. *Refreshment of the Board of Commissioners' Risk Management*
 36. *My Lantern AM Bancassurance Workshop*
 37. *Awareness Training ISO 37001: 2016*
 38. *Education Accelerate Your People Management Skills*
 39. *Risk Management refreshment Program: Smart Strategy for Credit Risk Management & Operational Risk during the Covid 19 Pandemic*
 40. *Provision of Level 1 Risk Management Certification*
 41. *Workshop on Copyright Law No. 11th 2020*

42. Pendidikan *Online* kelas intensif sistem AISA Batch 1 Level User CS (Peserta SOL, RA, CS)
43. Pendidikan UX Research *Online Bootcamp*
44. *Workshop How Does The Year 2021 Look Like for the Wealth Management Industry?*
45. Sertifikasi Manajemen Risiko
46. Sertifikasi Auditor Hukum
47. Webinar Ketenagakerjaan PP No. 36 Tahun 2021 tentang pengupahan dan kebijakan terkait pemberian THR Keagamaan 2021
48. Pendidikan 'Executive Coaching Bank Management for Board of Directors'
49. Webinar 2021 'Cyber Crime Typology & Cross Border Money Laundering'
50. Pendidikan JNCIA, JNCIP SP + Exam
51. Pendidikan Google Cloud Platform terkait API Management by APIGEE
52. *Workshop* Penyusunan Rencana Kerja dan Anggaran Perusahaan (RKAP) Revisi Th 2021 dan Rencana Revisi RBB Th 2021
53. RAKERNAS Transformasi 2021
54. Pendidikan 'Executive Coaching Bank Management for Board of Commissioners'
55. *Workshop* Pengembangan Credit Scoring Joint Model Non Payroll Pinang 2021
56. Pendidikan Bancassurance AM Lenteraku
57. Refreshment Kompetensi Manajemen Risiko
58. Pendidikan Khusus Profesi Advokat PKPA 2021
59. Certified HR Program Executives
60. Pembekalan Kompetensi Manajemen Risiko Level 3
61. Pendidikan Dasar/Development FO Baru 2021
62. Training Sertifikasi Scrum Master
63. Pembekalan Kompetensi Manajemen Risiko Level 4
64. Pendidikan BRILian Leader Development Program (BLDP) 5 Batch 8 Tahun 2021
65. Seminar *Online* Ekosistem Bisnis tentang Pendekatan Strategik untuk Berkolaborasi dan Berkompetisi dalam Bisnis
66. Pembekalan Sertifikasi Manajemen Risiko Level 2
67. Pembekalan Sertifikasi Manajemen Risiko Level 3
68. Pembekalan Sertifikasi Manajemen Risiko Level 4
69. IHT Pelatihan Python Programming for Data Science
70. Pendidikan Pengolahan Data dengan Microsoft Excel dalam Power Point dengan WPS
71. Training Product Owner
72. Pembekalan Kompetensi Manajemen Risiko Level 2
73. Webinar Legal and Compliance Aspect in Fraud Risk Management
74. Refreshment pendidikan bagi Komisaris 'Executive Coaching Bank Management for Board Commissioners'
75. Flutter Basic
76. *Workshop* pertanahan dan K3 dalam perizinan berusaha berbasis risiko melalui PP No.5 th 2021 dan uu cipta kerja
77. *Workshop* Internal dan Audit Forensik dalam Pendeteksian adanya Kecurangan dan Pencegahan Tindak Pidana Korupsi serta Peran Digital Audit dalam Menurunkan Fraud

78. Pendidikan *Enhancement RM tentang Sustainable Finance Awareness* (RAKB sesuai POJK S-47)
79. *Training Pengolahan Data dengan Microsoft Excel dalam Power Point dengan WPS*
80. *Product Owner*
81. *Refreshment Sertifikasi Manajemen Risiko Level 5*
82. *Executive Bank Strategis*
83. *Pembekalan Executive Overview Bank Strategic Management*
84. *Training & Piloting Community Branch*
85. Pendidikan *Intro to Data Science*
86. *Python for Data Science*
87. Webinar Paradigma baru Pencegahan & Pemberantasan Korupsi sesuai dgn UU KPK No. 19 tahun 2019
88. *Fundamental Digital Marketing*
89. *ATMR Operasional dan Budaya MR*
90. Sertifikat *Certified Financial Planner*
91. Webinar Asuransi Kredit & Penjamin Kredit
92. Webinar *Digital Risk Leadership : Orchestrating Business & Boardroom in Mitigating Risk*
93. Webinar Pencegahan Korupsi dengan Metode *Judgement*
94. *Fundamental UI/UX*
95. *Scalable Web Services with Golang*
96. *React & React Native (Front End)*
97. Pendidikan *Scalable Web Services With Golang*
98. Pendidikan *Fundamental UI/UX*
99. *Agile Scrum*
100. *Digital Leadership*
101. *Certified Ethical Hacker + Exam*
102. *Advance Valuation*
103. Pendidikan *Cloud Kitchen*
104. Pendidikan *Speaking English Local Prime*
105. *Pembekalan Sertifikasi Manajemen Risiko Level 1*
106. *Pembekalan Sertifikasi Manajemen Risiko Level 2*
107. *Pembekalan Sertifikasi Manajemen Risiko Level 3*
108. *Pembekalan Sertifikasi Manajemen Risiko Level 4*
109. Pendidikan *Certified Testers*
110. Pendidikan *Digital Marketing for CB*
111. *Refreshment manajemen risiko Level I - IV*
112. Pendidikan *Certified Testers*
113. Pendidikan *Executive Bank Overview (VP)*
114. Pendidikan *Comprehensive Credit Analysis Development Program*
115. *Refreshment Sertifikasi Manajemen Risiko Level 1-4*
116. *Pembekalan Sertifikasi Manajemen Risiko Level 3*
117. *HR & Score Card*
118. *Digitalisasi Operasional Kredit Community Branch*
119. *Pembekalan Sertifikasi Kepatuhan*
120. *Pembekalan Treasury Level Basic*
121. *Workshop Penyusunan RBB Tahun 2022 - 2024*
122. Pendidikan *Overview Visi, Misi & Revamp*
123. *Pembekalan Treasury Level Intermediate*
124. *Sertifikasi Google Cloud Platform*

78. RM Enhancement Education on Sustainable Finance Awareness (RAKB according to POJK S-47)
79. Data Processing Training with Microsoft Excel in Power Point with WPS
80. Product Owner
81. Refreshment of Level 5 Risk Management Certification
82. Strategic Bank Executive
83. Briefing on Executive Overview of Bank Strategic Management
84. Training & Piloting Community Branch
85. Educational Intro to Data Science
86. Python for Data Science
87. Webinar New paradigm of Corruption Prevention & Eradication in accordance with KPK Law no. 19 years 2019
88. Digital Marketing Fundamentals
89. RWA Operational and Cultural MR
90. Certified Financial Planner Certificate
91. Credit Insurance & Credit Guarantee Webinar
92. Digital Risk Leadership Webinar: Orchestrating Business & Boardroom in Mitigating Risk
93. Corruption Prevention Webinar with Judgment Method
94. UI/UX Fundamentals
95. Scalable Web Services with Golang
96. React & React Native (Front End)
97. Education Scalable Web Services with Golang
98. UI/UX Fundamental Education
99. Agile Scrum
100. Digital Leadership
101. Certified Ethical Hacker + Exam
102. Advance Valuation
103. Education Cloud Kitchen
104. Local Prime English-Speaking Education
105. Provision of Level 1 Risk Management Certification
106. Provision of Level 2 Risk Management Certification
107. Provision of Level 3 Risk Management Certification
108. Provision of Level 4 Risk Management Certification
109. Education Certified Testers
110. Digital Marketing Education for CB
111. Risk management refreshment Level I - IV
112. Education Certified Testers
113. Education Executive Bank Overview (VP)
114. Comprehensive Credit Analysis Development Program Education
115. Refreshment of Risk Management Certification Level 1-4
116. Provision of Level 3 Risk Management Certification
117. HR & Score Card
118. Digitalization of Community Branch Loan Operations
119. Provision of Compliance Certification
120. Basic Level Treasury Supply
121. Workshop on RBB Preparation 2022 - 2024
122. Education Overview Vision, Mission & Revamp
123. Provision of Intermediate Level Treasury
124. Google Cloud Platform Certification



125. Pendidikan <i>Project Management Office</i>	125. Project Management Office Education
126. Pendidikan <i>Credit Scoring & Risk Rating</i>	126. Education Credit Scoring & Risk Rating
127. <i>Workshop Perpajakan IAI</i>	127. IAI Tax Workshop
128. <i>Certificate of Completion (Chobit 2019)</i>	128. Certificate of Completion (Chobit 2019)
129. Pendidikan <i>Cybercrime Law</i>	129. Cybercrime Law Education
130. <i>Refreshment Sertifikasi Manajemen Risiko Batch 1</i>	130. Refreshment Risk Management Certification Batch 1
131. Pendidikan Optimalisasi Penanganan Kredit NPL & Dokumentasi Kredit	131. Education on Optimizing NPL Credit Handling & Credit Documentation
132. Pendidikan <i>Community Branch Cirebon</i>	132. Education Community Branch Cirebon
133. Pendidikan 3D & Animasi	133. 3D Education & Animation
134. Pendidikan <i>Marketing Fundamental Course</i>	134. Marketing Education Fundamental Course
135. Pendidikan <i>Fintech & Pengelolaan Arsip</i>	135. Fintech Education & Records Management
136. Pendidikan <i>Refreshment Bank Executive Overview</i>	136. Education Refreshment Bank Executive Overview
137. Pendidikan <i>Cyber Security</i>	137. Cyber Security Education
138. Pendidikan 3D & Animasi	138. 3D Education & Animation
139. Pendidikan <i>Intro to Data Science</i>	139. Education Intro to Data Science
140. Pembekalan & Uji Sertifikasi <i>Treasury level Advance</i>	140. Advance Level Treasury Certification & Testing
141. Undangan <i>Workshop Rasio Pembiayaan Inklusif Makroprudensial (RPIM)</i>	141. Invitation to the Macroprudential Inclusive Financing Ratio (RPIM) Workshop
142. Undangan Penerapan GCG tentang merumuskan Prinsip-prinsip Pedoman Evaluasi, Implementasi & sosialisasi penerapan GCG serta memberikan masukan kepada pemerintah dalam mengembangkan sistem pelaporan kinerja dalam rangka penerapan GCG pada BUMN/BUMD & swasta	142. Invitation for the Implementation of GCG regarding formulating the Guiding Principles for Evaluation, Implementation & dissemination of GCG implementation and providing input to the government in developing a performance reporting system in the context of implementing GCG in BUMN/BUMD & private
143. Pendidikan <i>Accelerate Your People Management Skills</i>	143. Education Accelerate Your People Management Skills
144. <i>Training Jira Service Management</i>	144. Jira Service Management Training
145. Webinar <i>Human Capital National Conference</i>	145. Human Capital National Conference Webinar
146. Undangan <i>Refreshment Core Banking System dan Evaluasi Setoran Bayar Tahun 2021</i>	146. Invitation to Refreshment Core Banking System and Evaluation of Payment Deposits in 2021
147. Pembekalan Sertifikasi Manajemen Risiko Level 1	147. Provision of Level 1 Risk Management Certification
148. Pengelolaan Arsip Digital	148. Digital Archive Management
149. Aspek Hukum <i>Financial Technology</i>	149. Legal Aspects of Financial Technology
150. <i>Gathering AO NPL</i>	150. Gathering AO NPL
151. <i>Gathering Pinca/Pincapem</i>	151. Branch Head/Sub-Branch Head Gathering
152. <i>Refreshment Sertifikasi Manajemen Risiko</i>	152. Refreshment of Risk Management Certification
153. <i>Training Pro Switching</i>	153. Training Pro Switching
154. Pendidikan <i>Leadership Style & Model</i>	154. Educational Leadership Style & Model
155. Pendidikan Digitalisasi Operasional Kredit Perbankan	155. Education on Digitalization of Banking Credit Operations
156. <i>Training Administrasi dan Pengarsipan</i>	156. Administration and Archiving Training
157. <i>Benchmarking Program SESPIBANK Angkatan 72</i>	157. SESPIBANK Program Benchmarking Batch 72
158. FGD 'Penyelenggara Pra Rakernas Penyesuaian RBB 2022-2024 dan Sharing Session 'Business Model Innovation in Consumer Goods (FMCG)	158. FGD 'Organising Pre Rakernas RBB Adjustment 2022-2024 and Sharing Session Business Model Innovation in Consumer Goods (FMCG)
159. <i>Cyber Security</i>	159. Cyber Security
160. Pendidikan <i>Strategic Digital Marketing</i>	160. Strategic Digital Marketing Education
161. Sertifikasi <i>General Banking 1</i>	161. General Banking Certification 1
162. Sertifikasi <i>Credit Officer/Lending</i>	162. Credit Officer/Lending Certification
163. <i>Training Transaksi Derivative in Treasury</i>	163. Training on Derivative Transactions in Treasury
164. Pendidikan PSAK 73 untuk Perbankan	164. PSAK 73 Education for Banking
165. Pendidikan <i>Sustainable Finance Awareness</i>	165. Sustainable Finance Awareness Education
166. Pendidikan <i>Executive Development Bank Overview</i>	166. Education Executive Development Bank Overview
167. <i>Training Fundamental Development Program - Analisis Kredit</i>	167. Fundamental Development Program Training - Credit Analyst

168. *Financial Technology Innovation*
169. Pendidikan Kupas Tuntas Implikasi UU Ciptaker dan PKB
170. Pendidikan *Leadership 'Operational and Digital Service'*
171. Undangan Pengukuhan QIA
172. Webinar *Human Capital NATIONAL Conference*
173. Pelatihan Perpajakan PPN & PPH 23
174. *Training Google Cloud Certified Associate Cloud Engineer*
175. *Training Teknik Penyusunan SOP*
176. *Training Mastering Asset, Liabilities Management (ALM)*
177. *Training ALM Strategic & Fund Transfer Price in Bank*
178. *Workshop Asesor*
179. *Fintech & Digital Banking*
180. Pendidikan *Community Branch*
181. Pendidikan Implementasi *BI Fast*
182. Pendidikan *Fast Moving Consumer Goods (FMCG) Business to Business to Consumer*
183. Pendidikan Administrasi dan Pengarsipan
184. *Refreshment Treasury Level Basic, Advance dan Pembekalan Manajemen Risiko Level 3*
185. Pendidikan Kegiatan Maju Raya Hackathon 2021 *Culture Agent & Culture Leader*
186. Publik Speaking Professional
187. Pendidikan *Executive Development Bank Overview*
188. Pendidikan *Executive Development Bank Overview*
189. Pendidikan *Brilliant Leader Development Program (BLDP)*
190. *In House Training Pajak Brevet AB*

Untuk menyelenggarakan seluruh program tersebut, Bank mengeluarkan investasi sebesar Rp12.241 Juta naik 257% dibandingkan tahun 2020.

Rencana Pengelolaan HC ke Depan

Dalam rangka meningkatkan kapabilitas dan produktivitas Sumber Daya Manusia, baik dari segi *leadership* maupun kompetensi, dan memberikan penghargaan kepada Sumber Daya Manusia, maka pada Tahun 2022-2024 akan dilakukan Strategi sebagai berikut *Strengthening HR Function, Creative Talent Attraction, Talent Retention, Talent Development* dan *Culture Transformation* dengan penjelasan hal-hal sebagai berikut :

1. Melaksanakan *Redesign* organisasi Divisi *Human Capital* sebagai langkah kejelasan peran, hubungan kerja, dan persyaratan pekerjaan, yang dapat mendorong proses transformasi di seluruh bagian organisasi dan menjadi mitra strategis manajemen dalam implementasi transformasi bisnis.
2. Melaksanakan *assessment* kepada seluruh Pekerja Bank Raya (BOD-2) dengan melibatkan lembaga *assessment* yang memiliki reputasi yang baik sebagai penyedia jasa *assessment*.
3. Melakukan *talent mapping* kepada seluruh pekerja Bank Raya untuk ditempatkan sesuai dengan hasil *assessment*.

168. *Financial Technology Innovation*
169. Education Examines the Implications of the Copyright Law and PKB
170. *'Operational and Digital Service' Leadership Education*
171. QIA Inauguration Invitation
172. National Human Capital Conference Webinar
173. VAT & PPH Taxation Training 23
174. Training Google Cloud Certified Associate Cloud Engineer
175. SOP Preparation Technique Training
176. Training Mastering Assets, Liabilities Management (ALM)
177. ALM Strategic & Fund Transfer Price in Bank training
178. Assessor Workshop
179. Fintech & Digital Banking
180. Education Community Branch
181. BI Fast Implementation Education
182. Fast Moving Consumer Goods (FMCG) Education Business to Business to Consumer
183. Education Administration and Archives
184. Refreshment Treasury Level Basic, Advance and Risk Management Debriefing Level 3
185. Education for Advanced Activities Hackathon 2021 Culture Agent & Culture Leader
186. Public Speaking Professional
187. Education Executive Development Bank Overview
188. Education Executive Development Bank Overview
189. Education Brilliant Leader Development Program (BLDP)
190. In House Tax Brevet Training AB

To implement all of these activities, the Bank invested IDR12,241 million, a 257% increase over 2020.

HC Management Plan for the Future

To enhance Human Resources' potential and productivity, both in terms of leadership and competence, and to reward Human Resources, the following measures will be adopted in 2022-2024: *Strengthening HR Function, Creative Talent Attraction, Talent Retention, Talent Development* dan *Culture Transformation* with an explanation of the following:

1. Redesigning the Human Capital Division organizationally as a first step toward clarifying roles, work relationships, and job requirements, which can help to accelerate the transformation process throughout the organisation and position the division as a strategic partner to management in implementing business transformation.
2. Conducting an evaluation of all Bank Raya employees (BOD-2) with the assistance of an assessment organisation with a good reputation for providing assessment services.
3. Conducting talent mapping for all Bank Raya workers in order to arrange them appropriately based on the evaluation findings.

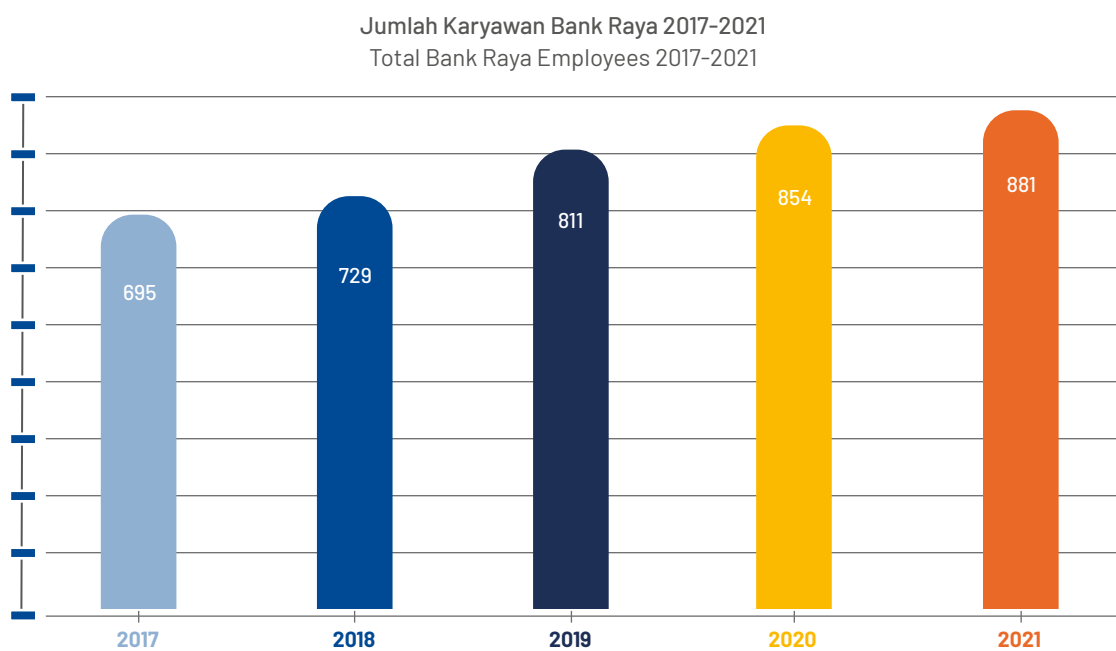
4. Melakukan rekrutmen talenta baru yang memiliki kapabilitas di bidang Digital.
 5. Melaksanakan pengisian formasi struktur organisasi baru berdasarkan kapabilitas, kompetensi pekerja dan formasi yang dibutuhkan melalui skema penugasan, *Talent Scouting*, *Partnership*, Rekrutmen Reguler *Talent Hiring* dan *Pro Hiring*.
 6. Melakukan pengisian pekerja untuk jabatan *Salesforce/Frontline Staf* dengan mempertimbangkan pembukaan unit kerja baru (*Community Branch*).
 7. Melakukan revitalisasi Budaya Kerja antara lain :
 - o Internalisasi Budaya Kerja dalam bentuk kompetisi internalisasi Budaya Kerja, kegiatan literasi termasuk kegiatan *Millennial's Day* dan Komunitas Hobi sebagai aktualisasi diri.
 - o Melaksanakan pendidikan *trainers of training* bagi *Culture Agent*, mengoptimalkan peran *Culture Agent* dan *Culture Leader*.
 - o Bekerja sama dengan *Corporate Culture Group* BRI untuk meningkatkan internalisasi Budaya Kerja di Bank Raya.
 - o Mengembangkan dan mendorong strategi *employer branding* selaras dengan prioritas bisnis perusahaan
 - o Menciptakan kenyamanan di tempat kerja (*convenience to work*) agar Pekerja dapat bekerja dengan optimal dan meningkatkan produktivitas.
 - o Meningkatkan produktivitas kerja yang mendukung akselerasi pertumbuhan bisnis, dengan cara meningkatkan peran *Change Agent* dalam perubahan Budaya Kerja yang lebih kondusif di masing-masing Unit Kerja terutama Kantor Cabang/*Community Branch* sebagai lini terdepan.
 8. Melaksanakan *Man Power Planning* secara tepat sesuai perkembangan bisnis dan organisasi.
 9. Pembinaan dan peningkatan peran satuan unit kerja untuk melakukan kaderisasi dengan mengembangkan sistem *Coaching & mentoring*.
 10. Menyempurnakan *compensation and benefit system* yang menarik, kompetitif untuk unit kerja bisnis dengan memperhatikan pertumbuhan dan kemampuan Bank Raya yang berkelanjutan.
 11. Menyempurnakan manajemen perencanaan *Talent Management System* bagi Pekerja sesuai kebutuhan organisasi.
 12. Menerapkan Sistem Manajemen Kinerja berbasis KPI untuk mengukur kinerja dengan konsep OKR (*Objective Key Result*).
 13. Menyempurnakan kebijakan disiplin Pekerja, sehingga penerapan *punishment* lebih objektif dan transparan sesuai tingkat kesalahan atau pelanggaran.
 14. Menyempurnakan kebijakan pendidikan dan pelatihan untuk mendukung pengembangan Sumber Daya Manusia yang berkesinambungan, baik bagi *entry level* maupun Pekerja.
 15. Pelaksanaan pendidikan/*enhancement/development* untuk seluruh pekerja yang sesuai dengan kebutuhan pengembangan kompetensi baik *hard* dan *soft skill* bisnis untuk mendukung pencapaian target dan akselerasi bisnis Digital.
4. Recruiting fresh talent with digital competencies.
 5. Assembling a new organisational structure based on the talents, competences, and needed training of employees via assignment schemes, talent scouting, partnerships, regular talent hiring, and pro hiring.
 6. Staffing *Salesforce/Frontline Staff* roles while exploring the establishment of a new work unit (*Community Branch*).
 7. Among other things, revitalising work culture:
 - o Internalisation of Work Culture via competitions, literacy events, such as *Millennial's Day*, and hobbyist communities as a means of self-actualisation.
 - o Conducting trainer training for trainers of culture agent training, maximising the responsibilities of culture agents and culture leaders.
 - o Collaborating with BRI's *Corporate Culture Group* to enhance Bank Raya's internalisation of work culture.
 - o Creating and supporting an employer branding plan that is consistent with the business's goals
 - o Creating a comfortable work environment (*convenience to work*) allows people to perform at their best and boost production.
 - o Increasing work productivity, which accelerates company development, by expanding the role of the *Change Agent* in fostering a more conducive work culture in each Work Unit, particularly Branch Offices/*Community Branches* as the front line.
 8. Adequately implementing manpower planning in response to business and organisational changes.
 9. Fostering and enhancing the role of work units in regeneration via the development of a coaching and mentoring system.
 10. Improving the attractiveness and competitiveness of the pay and benefit system for business work units while taking into consideration Bank Raya's sustainable development and capacity.
 11. Improving the *Talent Management System* by planning and managing employees in accordance with the organisation's requirements.
 12. Implementing a performance management system based on key performance indicators to track performance using the OKR (*Objective Key Result*) paradigm.
 13. Improving staff disciplinary practises to ensure that punishment is applied objectively and transparently based on the severity of the mistake or violation.
 14. Improving education and training strategies to foster the long-term development of human resources, both at the entry level and for existing personnel.
 15. Education/*enhancement/development* of all employees in line with the demands of competence development for both hard and soft business skills to support the accomplishment of objectives and acceleration of Digital business.

16. Mengembangkan program Pendidikan dan Pelatihan melalui kerjasama dengan BRI Corporate University {d/h Pusat Pendidikan dan Pelatihan (Diklat) PT Bank Rakyat Indonesia (Persero) Tbk} dan pihak eksternal untuk peningkatan *leadership*, produktivitas dan peningkatan kompetensi sesuai bidang tugas masing-masing Pekerja.
17. Mengikutsertakan manajemen dan Pekerja pada pendidikan sertifikasi sesuai kebutuhan dan ketentuan.

16. Developing education and training programmes in collaboration with BRI Corporate University, formerly the Education and Training Centre of PT Bank Rakyat Indonesia (Persero) Tbk, and external parties in order to improve leadership, productivity, and competence in their respective fields of duty.
17. Educating management and employees on certification requirements and laws.

Demografi Karyawan [GRI 102-7][C.3]

Employee Demographics [GRI 102-7][C.3]



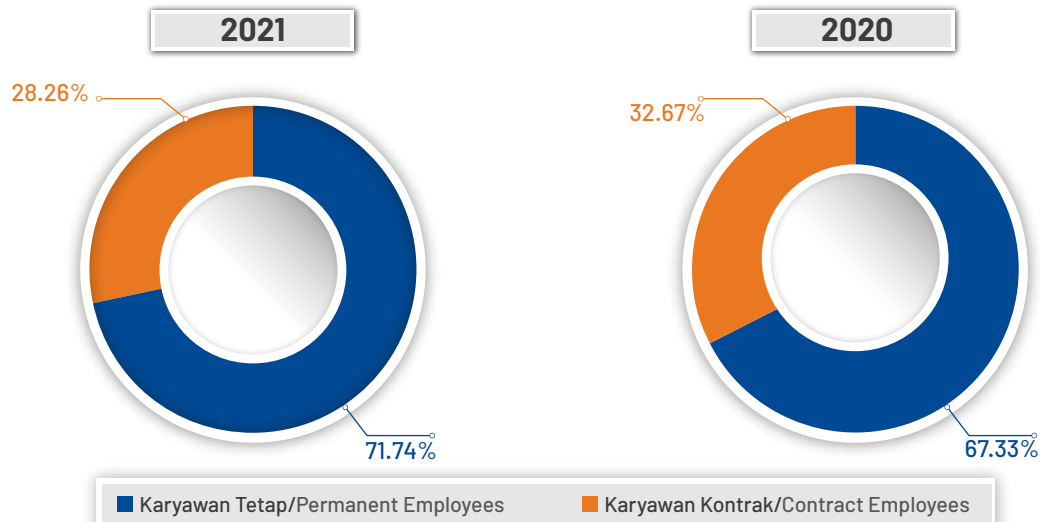
Pada 31 Desember 2021, jumlah karyawan Bank Raya tercatat sebanyak 881 orang. Jumlah tersebut mengalami peningkatan dibandingkan tahun sebelumnya sebanyak 854 orang.

Bank Raya employed 881 individuals as of December 31, 2021. This figure has grown by up to 854 persons from the previous year.

Komposisi Karyawan Berdasarkan Status Kekaryawanan

Employees' Composure Depending on Their Employment Status

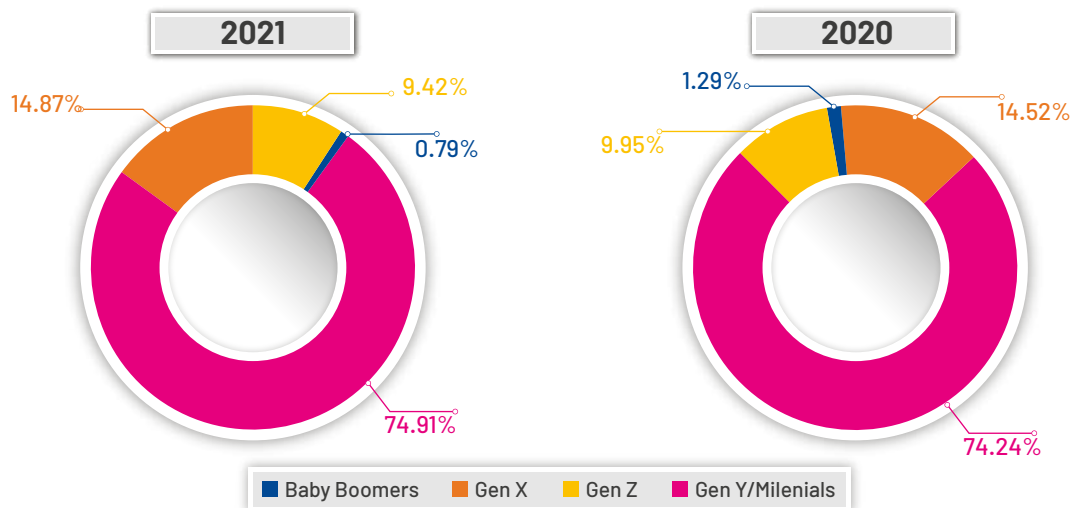
Status Karyawan Employees' Status	2021	2020
Karyawan Tetap Permanent	632	575
Karyawan Kontrak Contract	249	279
Jumlah Total	881	854



Komposisi Karyawan Berdasarkan Usia dan Generasi

Employee Composition by Age and Generation

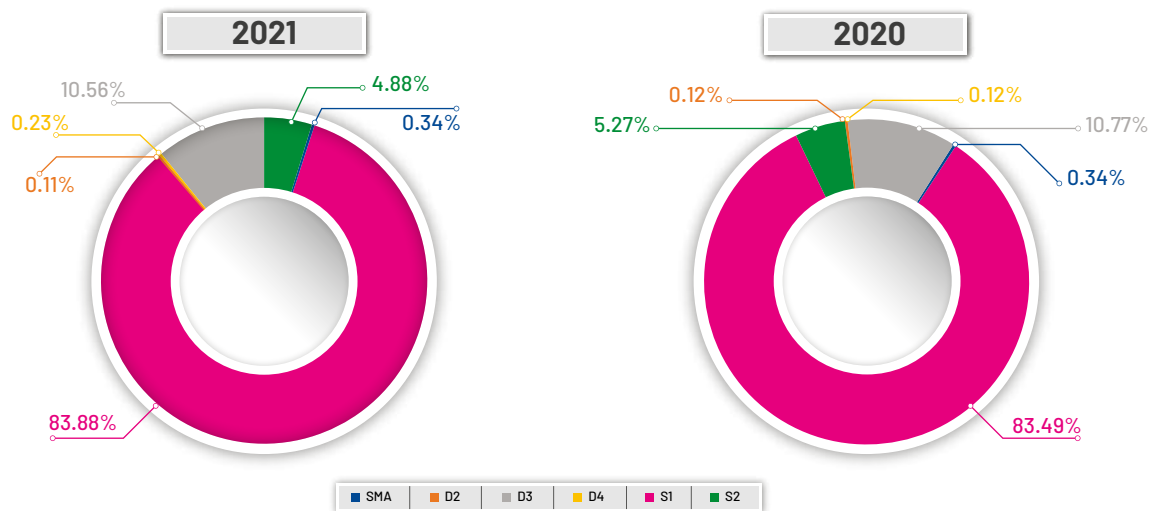
Generasi (Usia) Generation (Age)	2021	2020
Baby Boomers (>56 tahun) Baby Boomers (>56 years of age)	7	11
Gen X (41 – 55 tahun) Gen X (41 – 55 years of age)	131	124
Gen Y/Milenials (25 – 40 tahun) Gen Y/Millennials (25 – 40 years of age)	660	634
Gen Z (<25 tahun) Gen Z (<25 years of age)	83	85
Jumlah Total	881	854



Komposisi Karyawan Berdasarkan Tingkat Pendidikan

Employee Composition by Education Level

Jenjang Pendidikan Education Level	2021	2020
SMA Senior High School	3	1
D2	1	1
D3	93	92
D4	2	2
S1 Bachelor's Degree	739	713
S2 Master's Degree	43	45
Jumlah Total	881	854

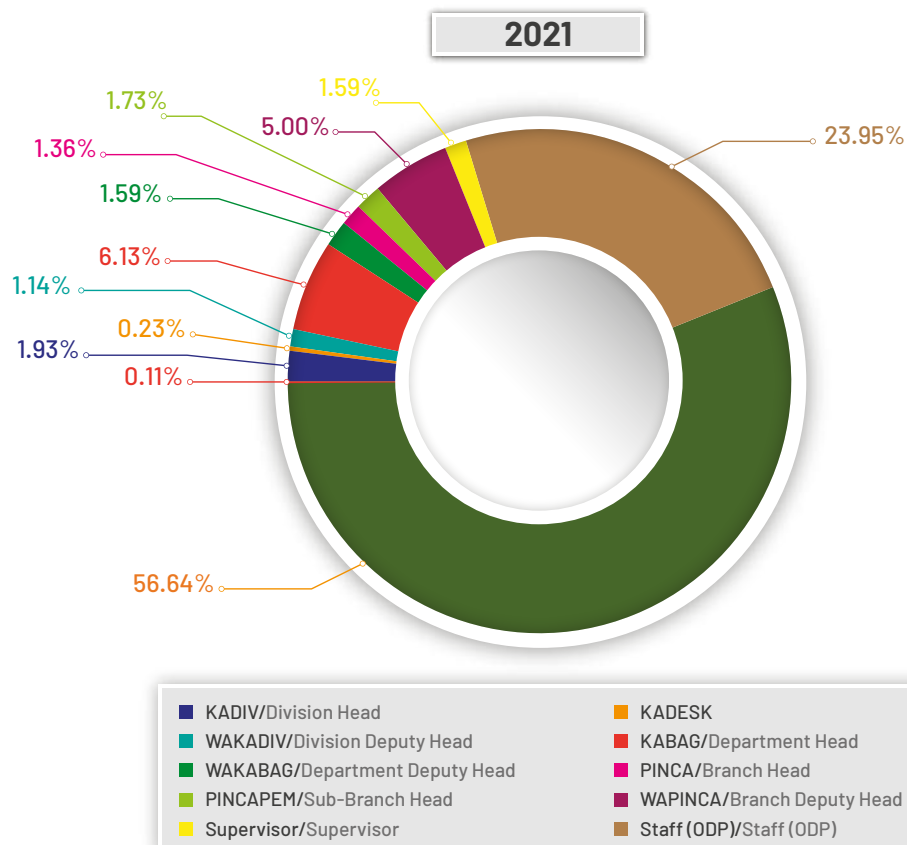


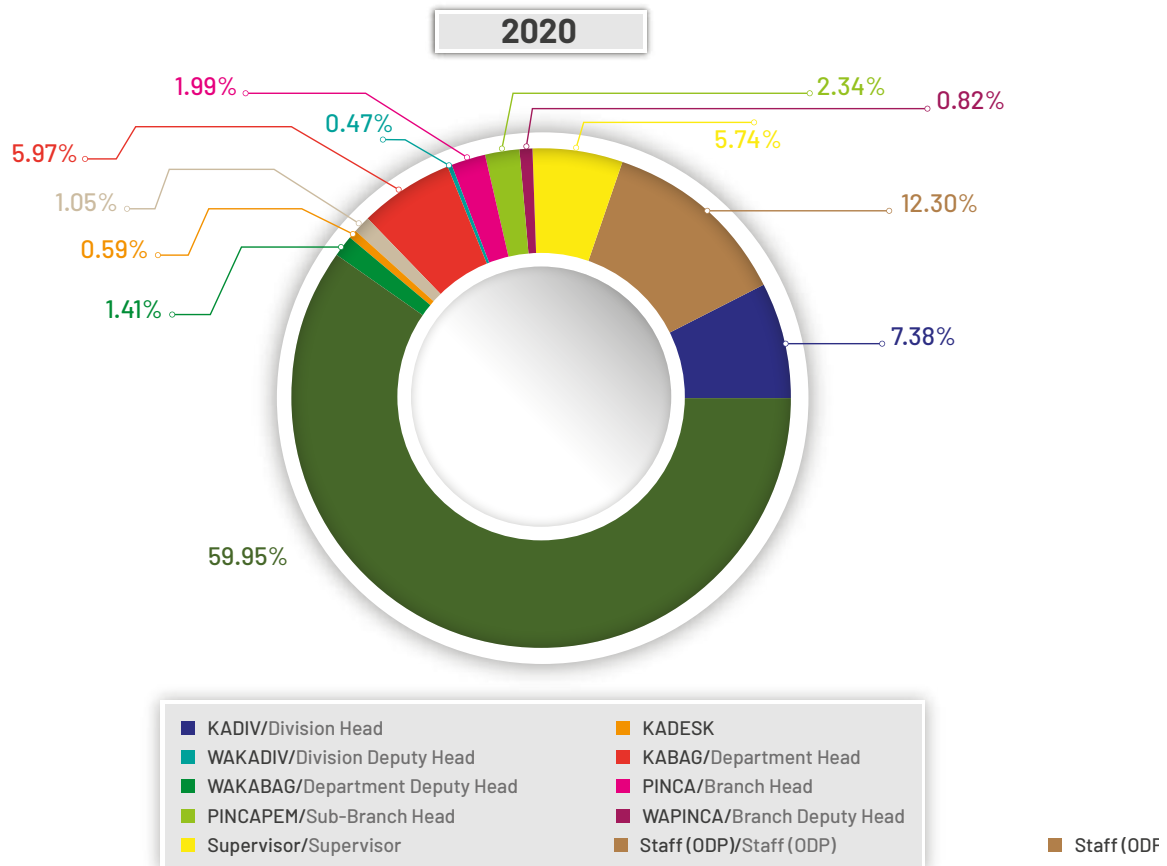
Komposisi Karyawan Berdasarkan Tingkat Jabatan

Employee Composition by Position

Tingkat Jabatan Position	2021	2020
SEVP SEVP	1	0
Kepala Divisi Executive Vice President	17	12
Kepala Desk Vice President	2	5
Wakil Kepala Divisi Vice President	10	9

Tingkat Jabatan Position	2021	2020
Kepala Bagian Manager	54	51
Wakil Kepala Bagian Assistant Manager	14	4
Pemimpin Cabang Branch Manager	12	17
Pemimpin Cabang Pembantu Sub Branch Manager	15	20
Wakil Pemimpin Cabang Assistant Branch Manager	5	7
Supervisor Supervisor	14	49
Staff (ODP) Officer	121	105
Staff (Non ODP) Officer Non ODP	90	63
Pelaksana Clerk	499	512
Jumlah Total	881	854

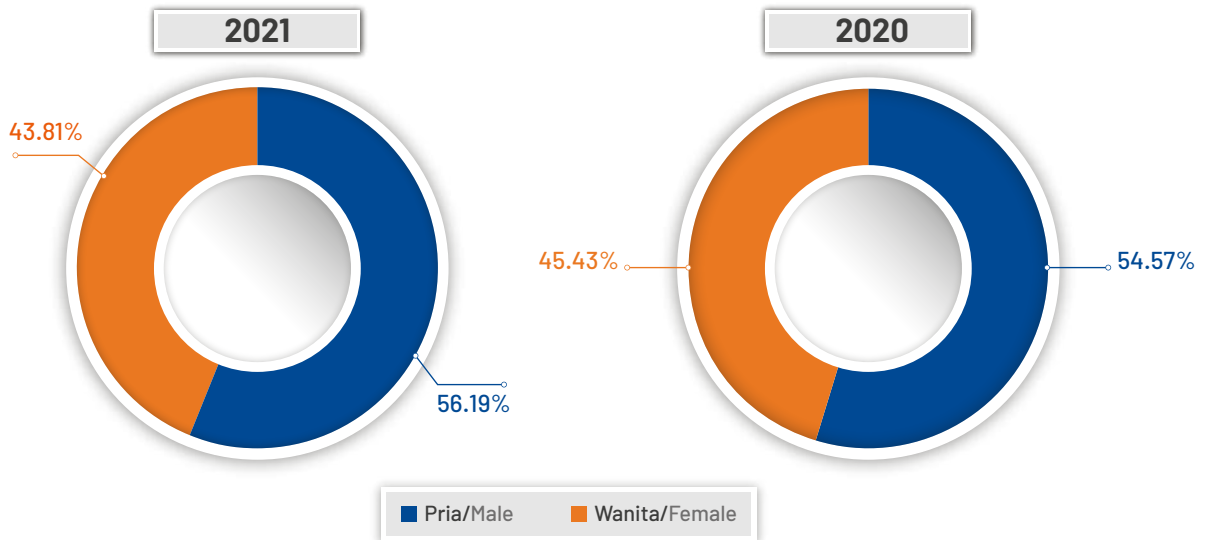




Komposisi Karyawan Berdasarkan Jenis Kelamin

Employee Composition by Gender

Jenis Kelamin Gender	2021	2020
Pria Male	495	466
Wanita Female	386	388
Jumlah Total	881	854



Teknologi Informasi Information Technology

Tahun 2021 menjadi tahun yang sangat menantang bagi Bank Raya, khususnya bagi Divisi *Information Technology* (Divisi IT) yang bertanggung jawab terhadap pengelolaan dan pengembangan Teknologi Informasi (TI) di Bank Raya.

Transformasi model bisnis yang dilakukan Bank Raya yaitu menjadi bank digital jelas membutuhkan dukungan TI yang sangat besar. Beruntung sebelumnya Bank Raya telah menerapkan teknologi terkini dengan dukungan *security operation and governance* yang kuat, sehingga proses transformasi tersebut dapat berjalan dengan baik.

Bank terus mengembangkan dan menyempurnakan bidang teknologi informasi guna meningkatkan daya saing di industri perbankan. Kualitas dan keamanan teknologi informasi juga terus dijaga guna meningkatkan kenyamanan nasabah dalam bertransaksi melalui *channel* Bank Raya.

Roadmap TI Bank Raya

Bank Raya telah memiliki *roadmap* TI yang dituangkan dalam dokumen IT *Master Plan*. Pemetaan seluruh inisiatif pada *Master Plan* TI Bank Raya 2020 -2024 berdasarkan dari skala prioritas.

Bank Raya will face significant challenges in 2021, particularly in the Information Technology Division (IT Division), which is responsible for the administration and development of Bank Raya's information technology (IT).

Bank Raya's development into a digital bank would undoubtedly need significant IT assistance. Fortunately, Bank Raya had already introduced cutting-edge technology and backed it up with robust security operations and governance, ensuring that the transition process went smoothly.

The Bank is constantly developing and improving its information technology capabilities in order to maintain a competitive edge in the banking market. Additionally, the quality and security of information technology are constantly monitored to maximise consumer convenience while transacting through the Bank Raya channel.

Bank Raya's Information Technology Roadmap

Bank Raya has had an IT plan, which is detailed in the document titled IT Master Plan. Mapping of all efforts in the Bank Raya IT Master Plan for the period 2020-2024 on a priority scale.

Program Prioritas 2021

Transformasi menjadi Bank Digital jelas membutuhkan dukungan penuh dari Divisi IT. Kesiapan infrastruktur dan SDM Divisi IT menjadi faktor yang sangat penting untuk menunjang keberhasilan program transformasi Bank.

Bank Raya menyadari, ada begitu banyak aspek yang perlu disesuaikan dalam proses transformasi tersebut, dan penyesuaian tersebut tidak dapat dilakukan dalam waktu yang singkat. Karena itu, Bank Raya telah menetapkan sejumlah program prioritas yang dilaksanakan tahun 2021.

Inisiatif-inisiatif ITMP Bank Raya 2020-2024 secara garis besar dapat digambarkan ke dalam 5 tema, sebagai berikut:

1. *Revenue Enhancement*
Peningkatan pendapatan Bank Raya melalui optimalisasi penyediaan dukungan TI
2. *Customer Experience Improvement*
Peningkatan kualitas layanan dan produk perbankan guna memberikan kemudahan dan kenyamanan kepada pelanggan Bank Raya dalam bertransaksi
3. *Agriculture Ecosystem Development*
Pengembangan platform ekosistem agribisnis berbasis digital guna memberikan kemudahan bagi para pelaku, rantai pasok didalam ekosistem agrobisnis sebagai diferensiasi bisnis bagi Bank Raya
4. *Operational Excellence*
Peningkatan kapabilitas dukungan aplikasi, teknologi maupun model operasi TI guna menunjang pelaksanaan operasional proses bisnis bank Raya sehari hari
5. *Compliance & Internal Control Improvement*
Peningkatan kepatuhan dan pengendalian internal terhadap regulasi perbankan dan standar pengelolaan TI yang berlaku

Peningkatan Kualitas SDM TI

Untuk mendukung pengembangan TI dalam rangka transformasi Bank, kapasitas dan kualitas SDM di Divisi IT juga harus ditingkatkan. Untuk itu, sepanjang tahun 2021 SDM di Divisi IT telah mengikuti berbagai program pelatihan untuk meningkatkan kompetensinya.

Beberapa program pelatihan yang diikuti oleh SDM Divisi IT tahun 2021 antara lain:

Priority Program in 2021

Clearly, the shift to a Digital Bank will need the IT Division's complete cooperation. The preparedness of the IT Division's infrastructure and human resources is critical to the Bank's transformation program's success.

Bank Raya recognises that there are several parts of the transformation process that must be altered, and these modifications cannot be performed in a short period of time. As a result, Bank Raya has prioritised a number of initiatives for implementation in 2021.

Bank Raya's ITMP plans for 2020-2024 may be roughly classified into five themes:

1. *Revenue Enhancement*
Increasing Bank Raya's revenue by streamlining IT support
2. *Customer Experience Improvement*
Enhancing the quality of banking services and products in order to give Bank Raya clients with ease and comfort while transacting
3. *Agriculture Ecosystems Development*
Development of a digital-based agribusiness ecosystem platform to facilitate interactions between players and supply chains in the agricultural ecosystem as a way for Bank Raya to differentiate its company
4. *Operational Excellence*
Enhancement of application support capabilities, technology, and information technology operating models to facilitate the operational execution of Bank Raya's daily business activities
5. *Compliance & Internal Control Improvement*
Compliance and internal control with relevant banking rules and information technology management standards have been enhanced.

Enhancing the Quality of IT Human Resources

To facilitate IT development in the context of the Bank's transformation, the capability and quality of the IT Division's human resources must also be enhanced. As a result, during 2021, Human Resources in the IT Division engaged in a variety of training programmes aimed at increasing their competency.

Several training sessions will be attended by the Human Resources Information Technology Division in 2021, including the following:

No.	Seminar/Pelatihan Workshop	Penyelenggara Organiser	Tanggal Pelaksanaan Date
1.	Pendidikan UX Research Online Bootcamp Education UX Research Online Bootcamp	Mentify	10 April - 30 Mei 2021 April 10 - May 30, 2021
2.	Pendidikan JNCIA, JNCIP SP + Exam JNCIA Education, JNCIP SP + Exam	ID Networkers	4 Mei - 11 Mei 2021 May 4 - May 11, 2021
3.	Pendidikan Google Cloud Platform terkait API Management by APIGEE Google Cloud Platform Education on API Management by APIGEE	APIGEE	5 - 11 Mei 2021 May 5 - 11, 2021
4.	Training Sertifikasi Scrum Master Scrum Master Certification Training	BRIDGE & Scrum	7 - 10 Juni 2021 June 7 - 10, 2021
5.	Flutter Basic Flutter Basic	Rumahcoding.co.id	28 Juni - 1 Juli 2021 June 28 - July 1, 2021
6.	Pendidikan Intro to Data Science Education on Intro to Data Science	Hacktiv8	27 Juli - 23 September 2021 July 27 - September 23, 2021
7.	Python for Data Science Python for Data Science	Hacktiv8	27 Juli - 23 September 2021 July 27 - September 23, 2021
8.	Scalable Web Services with Golang Scalable Web Services with Golang	Hacktiv8	24 Agustus - 29 Sept 2021 August 24 - September 29, 2021
9.	React & React Native (Front End) React & React Native (Front End)	Hacktiv8	24 Agustus - 29 September 2021 August 24 - September 29, 2021
10.	Pendidikan Scalable Web Services With Golang Education on Scalable Web Services with Golang	Hacktiv8	24 Agustus - 29 September 2021 August 24 - September 29, 2021
11.	Pendidikan Fundamental UI/UX Education on Fundamental UI/UX	Hacktiv8	24 Agustus - 30 September 2021 August 24 - September 30, 2021
12.	Agile Scrum Agile Scrum	Hacktiv8	28 - 31 Agustus 2021 August 28 - 31, 2021
13.	Certified Ethical Hacker + Exam Certified Ethical Hacker + Exam	Inixindo	30 Agustus - 3 September 2021 August 30 - September 3, 2021
14.	Pendidikan Certified Testers Education on Certified Testers	SQUADAP	8 - 28 September 2021 September 8 - 28, 2021
15.	Sertifikasi Google Cloud Platform Google Cloud Platform Certification	Trainocta	4 - 22 Oktober 2021 October 4 - 22, 2021
16.	Pendidikan Project Management Office Education on Project Management Office	Proveri	6-7 Oktober 2021 October 6-7, 2021
17.	Certificate of Completion (Chobit 2019) Certificate of Completion (Chobit 2019)	Inixindo	7-8 Oktober 2021 October 7-8, 2021
18.	Pendidikan Accelerate Your People Management Skills Education on Accelerate Your People Management Skills	Experd	14 Oktober 2021 October 14, 2021
19.	Training Jira Service Management Jira Service Management Training	Divisi TSI	1 - 4 November 2021 November 1 - 4, 2021
20.	Training Pro Switching Proswitching Training	Trainocate	12 - 13 November 2021 November 12 - 13, 2021
21.	Pendidikan Flutter Stacked Architecture with Kiss Dry Yagni Solid Principles Education on Flutter Stacked Architecture with Kiss Dry Yagni Solid Principles	TSI Bank Raya	26 November 2021 November 26, 2021
22.	Training Google Cloud Certified Associate Cloud Engineer Google Cloud Certified Associate Cloud Engineer Training	Trainocate	6 - 10 Desember 2021 December 6 - 10, 2021

Rencana Pengembangan TI ke Depan

Rencana kerja TI Bank Raya berdasarkan Revisi ITMP 2020-2024, adalah sebagai berikut:

1. Arsitektur Data
2. Arsitektur Aplikasi
3. Arsitektur Jaringan
4. Arsitektur *Server & Storage*
5. Arsitektur DC/DRC
6. Arsitektur *Client/User Device*
7. Arsitektur *Security & Incident Response*
8. Arsitektur Tata Kelola TI
9. Arsitektur Organisasi TI

Tata Kelola TI

Perkembangan TI yang semakin canggih dan serba bisa mulai diarahkan menjadi *enabler* terhadap peningkatan kinerja suatu organisasi. Yang kemudian memunculkan kesadaran, terutama di dunia industri, bahwa tanggung jawab pengelolaan TI tidak bisa sepenuhnya diserahkan ke unit/bagian/divisi yang hanya khusus menangani TI secara teknis (*IT Function*) sebagaimana pendekatan manajemen konvensional, melainkan juga harus menjadi tanggung jawab berbagai pihak manajemen dalam suatu organisasi. Hal inilah yang kemudian melahirkan konsep dan paradigma baru dalam mengelola Teknologi Informasi yang disebut dengan *IT Governance* (Tata Kelola Teknologi Informasi).

IT Governance merupakan suatu komitmen, kesadaran dan proses pengendalian manajemen organisasi terhadap sumber daya TI/ sistem informasi yang mencakup mulai dari *software*, *brainware*, *database* dan sebagainya, hingga ke Teknologi Informasi dan Jaringan LAN/Internet. Pengertian "*governance*" terhadap Teknologi Informasi (*IT Governance*) maksudnya adalah, penerapan kebijakan TI di dalam organisasi agar pemakaian TI (berikut pengadaan dan pelayanannya) diarahkan sesuai dengan tujuan organisasi tersebut.

Bank Raya mengembangkan *IT Governance* dalam mendukung operasional dan bisnis Bank. Kebijakan tersebut meliputi 5 aspek penting, yakni penetapan peran TI, perencanaan TI, kerangka kerja proses dan organisasi TI, pengelolaan proyek, pengelolaan risiko TI, serta penerapan *IT Governance* di sisi infrastruktur maupun aplikasi.

Dengan adanya *IT Governance* (Tata Kelola TI yang baik) yang berjalan di dalam suatu organisasi perusahaan, maka beberapa *IT Process* (*IT Activities*) yang dijalankan dapat berjalan secara sistematis, terkendali dan efektif. Bahkan pada menciptakan efisiensi dengan sendirinya mengurangi biaya operasional dan meningkatkan daya saing.

Future Information Technology Development Strategy

Bank Raya's IT work strategy for 2020-2024 is as follows:

1. Data Architecture
2. Application Architecture
3. Network Architecture
4. Server & Storage Architecture
5. DC/DRC Architecture
6. Client/User Device Architecture
7. Security & Incident Response Architecture
8. IT Governance Architecture
9. IT Organisational Architecture

Governance of Information Technology

The evolution of increasingly complex and adaptive information technology has shifted its focus toward serving as a facilitator for an organization's performance enhancement. Which then raises awareness, particularly in the industrial world, that IT management cannot be completely delegated to a unit/section/division that is solely responsible for IT technically (*IT Function*), as is the case with traditional management approaches, but must also be shared among various management parties within an organisation. This is what gave birth to *IT Governance*, a novel concept and paradigm for information technology management.

IT Governance is the commitment, awareness, and control method by which a company manages its information technology resources/ information systems, which range from *software*, *brainware*, and *databases* to information technology and LAN/Internet networks. The term "*governance*" in relation to information technology (*IT Governance*) refers to the process of implementing IT policies inside an organisation in order to ensure that IT (and related purchases and services) are used in line with the business's objectives.

Bank Raya builds information technology governance to assist its operations and business. The policy addresses five critical areas, including the definition of IT's function, IT planning, IT organisational procedures and frameworks, project management, and IT risk management, as well as the implementation of *IT Governance* on both the infrastructure and application sides.

With an *IT Governance* framework in place inside a business organisation, numerous *IT Processes* (*IT Activities*) may be carried out in a methodical, regulated, and successful way. Even efficiency improvements on their own lower operating costs and promote competitiveness.



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/ BAB 5

TATA KELOLA PERUSAHAAN CORPORATE GOVERNANCE





Komitmen Terhadap Penerapan Tata Kelola Perusahaan Commitment to Corporate Governance Implementation

Right Issue yang dilakukan Bank Raya di Bursa Efek Indonesia pada awal Desember tercatat mengalami *oversubscribed* sebanyak 38,5%. Terlampauinya target *rights issue* atas saham Bank Raya dengan kode saham "AGRO" tersebut mencerminkan kepercayaan investor terhadap Bank Raya yang tinggi.

Kepercayaan yang diberikan investor kepada Bank Raya bukanlah merupakan hasil kerja semalam. Bank Raya sudah sejak lama berupaya untuk membangun reputasinya. Bank Raya sangat menyadari, sebagai lembaga intermediasi, Bank harus dapat memperoleh kepercayaan dari semua pihak, termasuk juga dari investor dan nasabah.

Upaya Bank Raya untuk membangun reputasi tidak hanya ditunjukkan dengan pencapaian kinerja Bank. Lebih dari itu, Bank Raya juga secara konsisten menerapkan prinsip tata kelola perusahaan yang baik atau *Good Corporate Governance* (GCG) dalam setiap aktivitas operasionalnya.

Bank Raya sangat menyadari bahwa penerapan GCG yang efektif merupakan hal penting dalam membangun industri perbankan. Bagi Bank Raya, GCG merupakan rangkaian proses, perilaku, kebijakan yang mempengaruhi pengarahannya, pengelolaan serta pengendalian pada Bank Raya. Dalam praktiknya, Bank Raya juga melibatkan seluruh pihak pemangku kepentingan untuk memastikan jalannya penerapan GCG dalam lingkungan Bank Raya.

Dengan status sebagai perusahaan publik, Bank Raya juga harus memastikan bahwa operasional Bank telah sesuai dengan seluruh peraturan perundang-undangan yang berlaku. Bank Raya berkomitmen secara penuh untuk menerapkan prinsip-prinsip GCG sebagai landasan dalam menciptakan nilai tambah yang berkelanjutan bagi kepentingan para Pemegang Saham, masyarakat secara luas dan berbagai pemangku kepentingan lainnya (pegawai, konsumen, regulator, mitra kerja, dan lain-lain) baik dalam jangka pendek maupun jangka panjang.

Bank Raya menekankan praktik terbaik penerapan GCG yang berlaku di industri beserta perkembangannya terkini, antara lain kepatuhan terhadap peraturan perundang-undangan yang berlaku, serta *Roadmap* Tata Kelola perusahaan Indonesia yang dikeluarkan oleh Otoritas Jasa Keuangan (OJK).

Bank Raya's right issue on the Indonesian Stock Exchange in early December was 38.5% oversubscribed. The fact that the objective for the rights issuance of Bank Raya shares with the stock code "AGRO" was exceeded demonstrates the company's strong degree of investor trust.

Investors' confidence in Bank Raya is not the outcome of overnight labour. Bank Raya has been attempting to establish a name for a lengthy period of time. Bank Raya is acutely aware that, in its capacity as a mediator, it must earn the confidence of all stakeholders, including investors and consumers.

Bank Raya's attempts to establish a positive reputation are not limited to its performance successes. Additionally, Bank Raya follows the principles of Good Corporate Governance (GCG) consistently in all of its operating operations.

Bank Raya is acutely aware of the critical nature of successful GCG in developing the banking sector. GCG is a collection of procedures, behaviours, and policies that impact Bank Raya's direction, management, and control. In practise, Bank Raya engages all stakeholders to ensure that GCG is implemented across the bank.

As a public company, Bank Raya is also responsible for ensuring that the Bank's activities comply with all relevant laws and regulations. Bank Raya is completely dedicated to applying GCG principles as the foundation for generating sustained added value for Shareholders, society at large, and a variety of other stakeholders (workers, customers, regulators, business partners, and others) in the medium and long term.

Bank Raya places a premium on industry best practises for implementing GCG, as well as current developments, such as compliance with relevant laws and regulations, as well as the Financial Services Authority's Indonesian Corporate Governance Roadmap (OJK).

Dasar Penerapan GCG

Basis of GCG Implementation

Penerapan GCG pada Bank Raya mengacu kepada beberapa peraturan yang dikeluarkan oleh pemerintah dan regulator, antara lain:

Undang-undang

1. Undang-undang Nomor 7 tahun 1992 tentang Perbankan, sebagaimana telah diubah dengan Undang-undang Nomor 10 Tahun 1998 Tentang Perbankan;
2. Undang-undang Nomor 8 tahun 1995 tentang Pasar Modal;
3. Undang-undang Nomor 40 tahun 2007 tentang Perseroan Terbatas;

Peraturan dan Surat Edaran dari Otoritas Jasa Keuangan

4. Peraturan OJK Nomor 18/POJK.03/2014 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan;
5. Peraturan OJK Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik;
6. Peraturan OJK Nomor 34/POJK.04/2014 tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik;
7. Peraturan OJK Nomor 35/POJK.04/2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik;
8. Peraturan OJK Nomor 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit;
9. Peraturan OJK Nomor 56/POJK.04/2015 tentang Pembentukan dan Pedoman Piagam Unit Audit Internal;
10. Peraturan OJK Nomor 21/POJK.04/2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka;
11. Peraturan OJK Nomor 31/POJK.04/2015 tentang Keterbukaan atas Informasi atau Fakta Material oleh Emiten atau Perusahaan Publik;
12. Peraturan OJK Nomor 8/POJK.04/2015 tentang Situs Web Emiten atau Perusahaan Publik;
13. Peraturan OJK Nomor 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
14. Peraturan OJK Nomor 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum;
15. Peraturan OJK Nomor 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik;
16. Peraturan OJK Nomor 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka;
17. Surat Edaran OJK Nomor 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka;
18. Surat Edaran OJK Nomor 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
19. Surat Edaran OJK Nomor 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum;
20. Surat Edaran OJK Nomor 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.

GCG implementation at Bank Raya is governed by a number of rules imposed by the government and authorities, including the following:

Constitution

1. Banking Law No. 7 of 1992, as modified by Banking Law No. 10 of 1998;
2. Capital Markets Law No. 8 of 1995;
3. Limited Liability Company Law No. 40 of 2007;

Financial Services Authority Regulations and Circulars

4. FSA Regulation No. 18/POJK.03/2014 on Financial Conglomerates' Integrated Governance;
5. FSA Regulation No. 33/POJK.04/2014 on Issuers' or Public Companies' Boards of Directors and Boards of Commissioners;
6. FSA Regulation 34/POJK.04/2014 on Nomination and Remuneration Committees for Issuers or Public Companies;
7. FSA Regulation 35/POJK.04/2014 relating to the Corporate Secretary of Issuers or Public Companies;
8. FSA Regulation No. 55/POJK.04/2015 on the Establishment and Operation of the Audit Committee;
9. FSA Regulation 56/POJK.04/2015 Establishing and Charging the Internal Audit Unit;
10. FSA Regulation No. 21/POJK.04/2015 on the Application of Public Company Governance Principles;
11. FSA Regulation No. 31/POJK.04/2015 on Issuers' or Public Companies' Disclosure of Information or Material Facts;
12. FSA Regulation No. 8/POJK.04/2015 on Issuers' or Public Companies' Websites;
13. FSA Regulation 18/POJK.03/2016 on Risk Management in Commercial Banks;
14. FSA Regulation No. 55/POJK.03/2016 on Good Corporate Governance in Commercial Banks;
15. FSA Regulation 29/POJK.04/2016 on Issuers' or Public Companies' Annual Reports;
16. FSA Regulation No. 15/POJK.04/2020 on the Organization and Conduct of General Meetings of Shareholders in Public Companies;
17. FSA Circular Letter No. 32/SEOJK.04/2015 on Guidelines for Public Company Governance;
18. FSA Circular Letter 34/SEOJK.03/2016 on Risk Management in Commercial Banks;
19. FSA Circular Letter No. 13/SEOJK.03/2017 on Corporate Governance in Commercial Banks;
20. FSA Circular Letter 16/SEOJK.04/2021 on the Form and Content of Issuers' or Public Companies' Annual Reports.

Ketentuan Lainnya

21. Anggaran Dasar PT Bank Raya Indonesia, Tbk di dalam Akta No.18 tanggal 27 April 2021, dibuat dihadapan Mochamad Nova Faisal, S.H., M.K.n., Notaris di Jakarta.
22. Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk No.Kpts:B.585/DIR.02.04/OJL/10/2021 tentang Kebijakan Penerapan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance*).

Other Terms

21. PT Bank Raya Indonesia, Tbk Articles of Association in Deed No.18 dated 27 April 2021, prepared before Mochamad Nova Faisal, S.H., M.K.n., Notary in Jakarta.
22. Decree No. Kpts: B.585/DIR.02.04/OJL/10/2021 of the Board of Directors of PT Bank Raya Indonesia, Tbk, on the Policy for the Implementation of Good Corporate Governance.

Prinsip GCG GCG Fundamentals

Dalam menerapkan GCG, Bank Raya mengacu pada 5 (lima) prinsip dasar Tata Kelola yaitu TARIF : *Transparency* (Transparansi), *Accountability* (Akuntabilitas), *Responsibility* (Tanggung Jawab), *Independency* (Independensi) dan *Fairness* (Kewajaran).

Bank Raya's implementation of GCG is guided by five (five) fundamental principles of governance, namely Tariffs: *Transparency*, *Accountability*, *Responsibility*, *Independence*, and *Fairness*.

Penjelasan penerapan kelima prinsip GCG tersebut di dalam lingkup Bank Raya adalah sebagai berikut:

The following elucidation provides context for the use of the five GCG principles within the context of Bank Raya:

Prinsip Transparansi

Transparency Principle

Prinsip keterbukaan dalam melaksanakan proses pengambilan keputusan dan keterbukaan Bank Raya dalam menyampaikan informasi yang material dan relevan mengenai segala sesuatu tentang Bank Raya.

Penerapan prinsip transparansi di Bank Raya :

1. Bank Raya mengungkapkan informasi secara tepat waktu, memadai, jelas, akurat dan dapat diperbandingkan serta dapat diakses oleh pemangku berkepentingan (*stakeholders*) sesuai dengan haknya.
2. Bank Raya mengungkapkan informasi yang meliputi tetapi tidak terbatas pada visi, misi, sasaran usaha, strategi Bank Raya, kondisi keuangan, susunan dan kompensasi pengurus, Pemegang Saham Pengendali, pejabat eksekutif, pengelolaan risiko, sistem pengawasan dan pengendalian intern, status kepatuhan, sistem dan implementasi *Good Corporate Governance* serta informasi dan fakta material yang dapat mempengaruhi keputusan pemodal (*investor*).
3. Prinsip keterbukaan informasi tetap memperhatikan ketentuan rahasia bank, rahasia jabatan, rahasia perusahaan dan hak-hak pribadi sesuai ketentuan yang berlaku.
4. Kebijakan Bank Raya harus tertulis dan dikomunikasikan kepada *stakeholders* dan yang berhak memperoleh informasi tentang kebijakan tersebut sesuai ketentuan yang berlaku.

The notion of openness in decision-making and the transparency of Bank Raya in transmitting substantial and pertinent information about the bank.

Bank Raya's use of the idea of transparency:

1. Bank Raya makes information available to stakeholders in a timely, sufficient, transparent, accurate, and comparable way that complies with their rights.
2. Bank Raya discloses information about its vision, mission, business objectives, strategy, financial condition, management structure and compensation, controlling shareholders, executive officers, risk management, internal supervision and control system, compliance status, system and implementation of Good Corporate Governance, as well as other information and material facts that may influence investors' decisions (*investors*).
3. The concept of information sharing continues to adhere to relevant legislation regarding bank secrecy, position secrets, corporate secrets, and personal rights.
4. In line with relevant rules, Bank Raya policies shall be established and disseminated to stakeholders and those authorised to get information about the policy.

Prinsip Akuntabilitas

Accountability Principle

Prinsip kejelasan fungsi, struktur, sistem, pelaksanaan dan tanggung jawab di dalam organisasi sehingga pengelolaan Bank Raya dapat berjalan efektif dan efisien.

The notion of clarity in the organisation's roles, structures, processes, implementation, and duties in order for Bank Raya's management to operate successfully and efficiently.

Penerapan prinsip akuntabilitas di Bank Raya :

1. Bank Raya menetapkan sasaran usaha dan strategi untuk dapat dipertanggungjawabkan kepada *stakeholders*.
2. Bank Raya menetapkan *check and balance system* dalam pengelolaan Bank Raya.
3. Bank Raya memiliki ukuran kinerja dari semua organ organisasi berdasarkan ukuran yang disepakati dan sejalan dengan nilai-nilai perusahaan (*Corporate Culture Values*), sasaran usaha dan strategi Bank Raya serta memiliki *rewards and punishment system*.
4. Bank Raya harus meyakini bahwa semua organ organisasi Bank Raya mempunyai kompetensi sesuai dengan tanggung jawabnya dan memahami perannya dalam implementasi *Good Corporate Governance*.

Bank Raya's use of the idea of accountability:

1. Bank Raya establishes business objectives and plans in order to demonstrate accountability to stakeholders.
2. Bank Raya implements a system of checks and balances in its administration.
3. Bank Raya has performance metrics in place for all organisational organs that are agreed upon and are consistent with the bank's corporate culture values, business objectives, and strategies, as well as a rewards and punishment system.
4. Bank Raya must think that all of its organisational organs possess the necessary competence to undertake their tasks and are aware of their role in implementing Good Corporate Governance.

Prinsip Tanggung Jawab

Responsibility Principle

Prinsip yang mengemukakan kesesuaian pengelolaan Bank Raya dengan peraturan perundang-undangan yang berlaku serta prinsip-prinsip pengelolaan bank yang sehat.

These are the principles that govern Bank Raya's management in accordance with relevant laws and regulations as well as solid banking practises.

Penerapan prinsip tanggung jawab pada Bank Raya :

1. Bank Raya berpegang pada prinsip kehati-hatian (*prudential bank practices*) dan menjamin kepatuhan terhadap peraturan yang berlaku.
2. Bank Raya sebagai *good corporate citizen* peduli terhadap lingkungan dan melaksanakan tanggung jawab sosial secara wajar.

Bank Raya's use of the idea of responsibility:

1. Bank Raya adheres to prudential banking practice and abides by all applicable laws.
2. Bank Raya, as a responsible corporate citizen, is environmentally conscious and ethical in its social responsibilities.

Prinsip Independensi

Independence Principle

Prinsip yang menekankan sikap profesionalisme tanpa benturan kepentingan, pengaruh, serta tekanan dari pihak manapun yang bertentangan dengan peraturan perundang-undangan yang berlaku serta prinsip pengelolaan bank yang sehat.

The concept that stresses professionalism in the absence of conflict of interest, influence, or pressure from any party that is inconsistent with applicable rules and regulations and good bank management practises.

Penerapan prinsip independensi di Bank Raya :

1. Bank Raya menghindari terjadinya dominasi yang tidak wajar oleh *stakeholders* manapun dan tidak terpengaruh oleh kepentingan sepihak serta terbebas dari benturan kepentingan (*conflict of interest*).
2. Bank Raya mengambil keputusan secara objektif dan bebas dari segala tekanan pihak manapun.

Bank Raya's use of the idea of independence:

1. Bank Raya is free of unjustified dominance by any stakeholder, is not influenced by unilateral interests, and is conflict-free.
2. Bank Raya takes choices objectively and independently of any other influence.

Prinsip Kesetaraan dan Kewajaran

Fairness Principle

Prinsip perlakuan adil dan setara dalam memenuhi hak-hak pemangku kepentingan berdasarkan peraturan perundang-undangan yang berlaku.

The notion of fair and equitable treatment in accordance with current rules and regulations when it comes to enforcing stakeholders' rights.

Penerapan prinsip kesetaraan dan kewajaran pada Bank Raya :

1. Bank Raya memperhatikan kepentingan seluruh *stakeholders* berdasarkan asas kesetaraan dan kewajaran (*equal treatment*).
2. Bank Raya memberikan kesempatan kepada seluruh *stakeholders* untuk memberikan masukan dan menyampaikan pendapat bagi kepentingan Bank Raya serta membuka akses terhadap informasi sesuai dengan prinsip keterbukaan.

Bank Raya's use of the idea of fairness:

1. Bank Raya prioritises the interests of all stakeholders in accordance with the ideals of equality and justice (*equal treatment*).
 2. Bank Raya offers chances for all stakeholders to contribute ideas and voice their thoughts for the benefit of the bank, as well as open access to information in line with the openness concept.
-

Tujuan Penerapan GCG

Objectives of GCG Implementation

Penerapan GCG di Bank Raya bertujuan untuk:

1. Mendukung pelaksanaan kegiatan usaha Bank dalam mewujudkan Visi, Misi dan Nilai-Nilai Bank;
2. Mendukung tercapainya tujuan Bank melalui peningkatan kinerja yang signifikan baik dari segi kuantitas maupun kualitas;
3. Memberikan pedoman bagi Dewan Komisaris, Direksi, Komite dan Pekerja dalam melaksanakan tugas dan tanggung jawabnya;
4. Memberikan keyakinan kepada Pemegang Saham dan *stakeholders* lainnya bahwa pengurusan dan pengawasan Bank dijalankan secara profesional dan sesuai ketentuan hukum yang berlaku;
5. Mendukung pengelolaan seluruh sumber daya yang dimiliki oleh Bank secara lebih efisien dan efektif;
6. Meminimalkan risiko Bank;
7. Memaksimalkan kualitas dan integritas Bank agar Bank memiliki daya saing yang kuat, baik secara nasional maupun internasional.

The implementation of GCG at Bank Raya intends to accomplish the following:

1. Assist the Bank in carrying out its business operations in accordance with the Bank's Vision, Mission, and Values;
2. Contribute to the Bank's fulfilment of its goals via substantial performance improvements in both quantity and quality;
3. Establish guidelines for the Board of Commissioners, the Board of Directors, the Committees, and the Employees in carrying out their respective roles and obligations;
4. Assure shareholders and other stakeholders that the Bank is managed and supervised competently and in line with relevant legal regulations;
5. Assist the Bank in managing all of its assets more efficiently and effectively;
6. Reduce the Bank's exposure to risk;
7. Improve the Bank's quality and integrity in order to increase its national and international competitiveness.

Kerangka Penerapan Tata Kelola

Governance Implementation Framework

Penerapan GCG di Bank Raya mengacu kepada 3 (tiga) aspek Tata Kelola, yaitu struktur Tata Kelola (*governance structure*), proses Tata Kelola (*governance process*) dan hasil Tata Kelola (*governance outcome*).

At Bank Raya, GCG refers to three (three) facets of governance: governance structure, governance process, and governance results.

Governance Structure

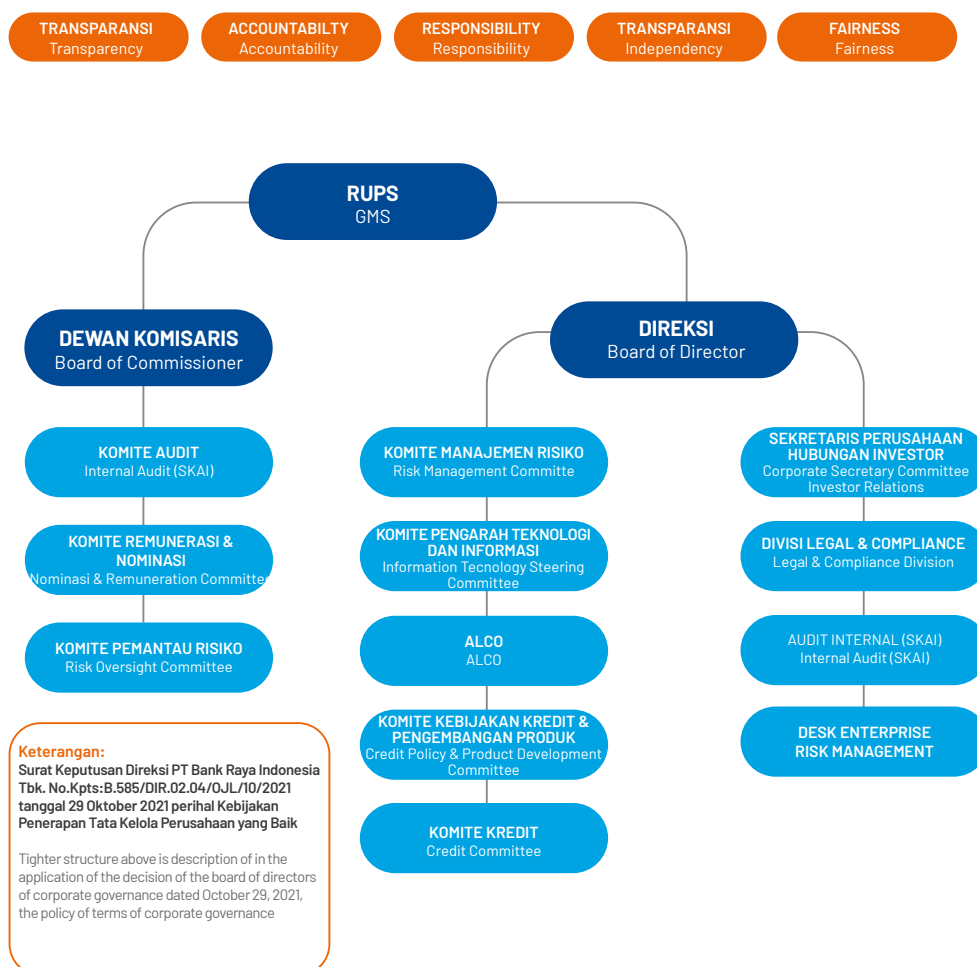
Governance Structure

Struktur Tata Kelola merupakan organ atau perangkat yang dimiliki oleh perusahaan, baik organ atau perangkat yang dibentuk karena kepatuhan terhadap peraturan dan perundang-undangan yang berlaku, maupun organ atau perangkat yang dibentuk karena kebutuhan internal dalam rangka meningkatkan penerapan GCG.

Governance structure is an organ or device that is held by the firm; it may be established to comply with relevant rules and regulations, or it may be developed to meet internal demands to enhance GCG implementation.

Struktur Tata Kelola perusahaan Bank Raya sebagaimana ditetapkan dalam Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk No. Kpts:B.585/DIR.02.04/OJL/10/2021 tanggal 29 Oktober 2021 perihal Kebijakan Penerapan Tata Kelola Perusahaan yang Baik, adalah sebagai berikut :

Bank Raya's corporate governance structure, as specified in the Board of Directors' Decree PT Bank Raya Indonesia, Tbk No. Kpts:B.585/DIR.02.04/OJL/10/2021 dated on October 29, 2021 about the Policy for the Implementation of Good Corporate Governance, is as follows:



Governance Process

Proses Tata Kelola merupakan rangkaian proses, kebiasaan, aturan dan institusi yang mempengaruhi pengelolaan perusahaan secara keseluruhan. Proses Tata Kelola mencakup peraturan dan perundang-undangan yang berlaku bagi perusahaan, prosedur tetap, piagam, dokumen, hingga aturan yang diberlakukan yang mengatur hubungan antar organ atau perangkat.

Agar struktur Tata Kelola dapat berjalan dengan baik dan memiliki batasan tanggung jawab masing-masing, diperlukan proses Tata Kelola seperti peraturan dan perundang-undangan serta serangkaian aturan internal, yang diharapkan dapat menciptakan lingkungan organisasi perusahaan berbasis pengelolaan yang akuntabel. Perusahaan telah menyusun, menerapkan dan memperbaharui kebijakan, aturan dan prosedur tetap, meliputi antara lain:

The Governance Process is a collection of procedures, conventions, norms, and institutions that influence the company's overall management. The governance process encompasses everything from the company's rules and regulations, established processes, charters, and papers, to the rules that govern the interaction between organs or devices.

To ensure that the Governance structure operates effectively and with appropriate accountability, it is necessary to have a Governance process that includes both external laws and regulations and internal rules that are expected to create an accountable management-based corporate organisational environment. The Company has established, implemented, and updated policies, regulations, and processes, which include but are not limited to the following:

Kebijakan dan Prosedur Policies and Mechanisms	Penerapan Implementation
Anggaran Dasar Bank	Akta No.18 tanggal 27 April 2021, dibuat dihadapan Mochamad Nova Faisal, S.H., M.K.n., Notaris di Jakarta. dan telah mendapatkan persetujuan dari Menteri Hukum dan Hak asasi Manusia Republik Indonesia No.AHU-AH.01.03.0271778 Tahun 2021 tanggal 28 April 2021.
Bank's Articles of Association	Deed No.18 dated April 27, 2021, notarized in Jakarta by Mochamad Nova Faisal, S.H., M.K.n. It has received approval from the Minister of Law and Human Rights of the Republic of Indonesia under the number AHU-AH.01.03.0271778 of 2021 dated April 28, 2021.
Kebijakan Penerapan Tata Kelola Perusahaan yang Baik	Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk No.Kpts: B.585/DIR.02.04/OJL/10/2021 tanggal 29 Oktober 2021 perihal Kebijakan Penerapan Tata Kelola Perusahaan yang Baik.
Good Corporate Governance Implementation Policy	Decree No. Kpts: B.585/DIR.02.04/OJL/10/2021 of the Board of Directors of PT Bank Raya Indonesia, Tbk dated October 29, 2021 about the Policy for the Implementation of Good Corporate Governance.
Pedoman Standar Perilaku Kode Etik (Code Of Conduct)	Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts B.616/DIR.01.02/OJL/11/2021 tanggal 15 November 2021 tentang Kebijakan Kode Etik Bank.
Code of Conduct Standard	Decree No.Kpts B.616/DIR.01.02/OJL/11/2021 of the Board of Directors of PT Bank Raya Indonesia, Tbk. dated November 15, 2021 on the Bank's Code of Conducts Policy.

Kebijakan dan Prosedur Policies and Mechanisms	Penerapan Implementation
Visi, Misi Dan Budaya Kerja Perusahaan	1. Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No. Kpts. B.281/Dir.02.04/CMG/06/2021 tanggal 14 Juni 2021 tentang Visi, Misi dan Nilai-nilai Bank Raya 2. Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No.Kpts.B.09/DIR.04.05/DCM/I/2018 tanggal 19 Januari 2018 tentang Revitalisasi Budaya Perusahaan 3. Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts. B.18/DIR.01.02/PSD/SDM/11/2019 tanggal 22 November 2019 tentang Program Internalisasi dan Eksternalisasi Budaya Kerja (<i>Corporate Culture</i>) 4. Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No.Kpts.10/DIR.04.05/DCM/I/2018 tanggal 19 Januari 2018 tentang Budaya Layanan.
Company Vision, Mission, and Work Culture	1. PT Bank Raya Indonesia, Tbk. Decree No. Kpts. B.281/Dir.02.04/CMG/06/2021 dated June 14, 2021 addressing Bank Raya's Vision, Mission, and Values 2. PT Bank Rakyat Indonesia Agroniaga Tbk. Board of Directors Resolution No.Kpts.B.09/DIR.04.05/DCM/I/2018 dated January 19, 2018 about Corporate Culture Revitalization 3. Decree No. Kpts. B.18/DIR.01.02/PSD/SDM/11/2019 dated November 22, 2019 by the Board of Directors of PT Bank Rakyat Indonesia Agroniaga Tbk on the Corporate Culture Internalization and Externalization Program. 4. PT Bank Rakyat Indonesia Agroniaga Tbk. Board of Directors Resolution No.Kpts.10/DIR.04.05/DCM/I/2018 dated January 19, 2018 about Service Culture.
Pedoman Kerja Dewan Komisaris & Organ Pendukung	Surat Keputusan Dewan Komisaris No.Kpts.B.01/KOM/SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris.
Work Guidelines for the Board of Commissioners & Supporting Organs	Decree No.Kpts.B.01/KOM/SKP/12/2021 of the Board of Commissioners dated December 29, 2021 establishing the Work Guidelines for the Board of Commissioners, the Audit Committee, the Remuneration and Nomination Committee, the Risk Monitoring Committee, and the Secretary to the Board of Commissioners.
Pedoman dan Tata Kerja Direksi	Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts. B.286/DIR.02.04/OJL/06/2021 tanggal 16 Juni 2021 tentang Pedoman dan Tata Kerja Direksi PT Bank Raya Indonesia, Tbk.
Guidelines and Work Procedures of the Board of Directors	Decree No.Kpts. B.286/DIR.02.04/OJL/06/2021 of the Board of Directors of PT Bank Raya Indonesia, Tbk, dated June 16, 2021, establishing Guidelines and Work Procedures for the Board of Directors of PT Bank Raya Indonesia, Tbk.
Piagam Komite Audit	16 November 2011 diperbarui beberapa kali dengan pembaruan terakhir tanggal 18 Desember 2019 tentang pedoman Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris.
Audit Committee Charter	The Work Guidelines for the Board of Commissioners, Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, and Secretary to the Board of Commissioners were amended many times between November 16, 2011 and December 18, 2019.
Piagam Komite Remunerasi & Nominasi	16 November 2011 diperbarui beberapa kali dengan pembaruan terakhir tanggal 18 Desember 2019 tentang pedoman Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris.
Remuneration & Nomination Committee Charter	The Work Guidelines for the Board of Commissioners, Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, and Secretary to the Board of Commissioners were amended multiple times beginning on November 16, 2011 and ending on December 18, 2019.
Piagam Komite Pemantau Risiko	16 November 2011 diperbarui beberapa kali dengan pembaruan terakhir tanggal 18 Desember 2019 tentang pedoman Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris.
Risk Monitoring Committee Charter	The Work Guidelines for the Board of Commissioners, Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, and Secretary to the Board of Commissioners were amended multiple times beginning on November 16, 2011 and ending on December 18, 2019.

Kebijakan dan Prosedur Policies and Mechanisms	Penerapan Implementation
Piagam Audit Intern	23 Juli 2013 diperbarui beberapa kali dengan pembaruan terakhir tanggal 31 Mei 2019 melalui Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga, Tbk. No.Kpts.R.78/ DIR.01.02/ SKAI/05/2019 tentang Piagam Audit Intern PT Bank Rakyat Indonesia Agroniaga, Tbk.
Internal Audit Charter	July 23, 2013 was modified many times, the most recent being on May 31, 2019 by the Board of Directors of PT Bank Rakyat Indonesia Agroniaga, Tbk. Decree No.Kpts.R.78/DIR.01.02/ SKAI/05/2019 approving the Internal Audit Charter of PT Bank Rakyat Indonesia Agroniaga, Tbk.
Pedoman Operasional Kepatuhan	Surat Edaran Direksi PT Bank Raya Indonesia, Tbk. No.SE.B.40/DIR.02.04/ OJL/LCA/11/2021 tanggal 22 November 2021 tentang Pedoman Operasional Kepatuhan.
Compliance Operational Guidelines	Circular No.SE.B.40/DIR.02.04/OJL/LCA/11/2021 of PT Bank Raya Indonesia, Tbk. dated November 22, 2021 about Compliance Operational Guidelines.
Pedoman Manajemen Risiko	Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts.B.18/DIR.01.03/ RMG/8/2020 tanggal 19 Agustus 2020 tentang Kebijakan Umum Manajemen Risiko (KUMR);
Risk Management Guidelines	PT Bank Rakyat Indonesia Agroniaga Tbk. Board of Directors Resolution No. Kpts.B.18/ DIR.01.03/RMG/8/2020 dated August 19, 2020 about the General Policy on Risk Management (KUMR);
Pedoman Benturan Kepentingan	Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts.13/DIR.01.02/OJL/LCA/01/2022 tanggal 12 Januari 2022 tentang Kebijakan Penanganan Benturan Kepentingan (<i>Conflict of Interest</i>)
Conflict of Interest Guidelines	Decree No.Kpts.13/DIR.01.02/OJL/LCA/01/2022 of the Board of Directors of PT Bank Raya Indonesia, Tbk. dated January 12, 2022 addressing the Conflict of Interest Policy.
Pedoman Program Anti Pencucian Uang Dan Pencegahan Pendanaan Terorisme (APU & PPT)	Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts : B.25 - DIR.03.04/LCA/08/2020 tanggal 27 Agustus 2020 tentang Pedoman Pelaksanaan Penerapan Program Anti Pencucian Uang Dan Pencegahan Pendanaan Terorisme (APU dan PPT) PT Bank Rakyat Indonesia Agroniaga Tbk. (revisi).
Anti-Money Laundering and Prevention of the Financing of Terrorism (APU & PPT) Programs Guidelines	Decree No. Kpts: B.25 - DIR.03.04/LCA/08/2020 of the Board of Directors of PT Bank Rakyat Indonesia Agroniaga Tbk dated August 27, 2020 regarding Guidelines for the Implementation of the Anti-Money Laundering and Counter-Terrorism Financing Programs (AML and CFT) of PT Bank Rakyat Indonesia Agroniaga Tbk (revision).
Pedoman Anti Penyuapan dan Pengendalian Gratifikasi	1. Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts.: B.363/DIR.01.02/ OJL/08/2021 tanggal 9 Agustus 2021 tentang Kebijakan Anti Penyuapan dan Pengendalian Gratifikasi. 2. Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts: B.669/DIR.02.04/OJL/ LCA/12/2021 tanggal 16 Desember 2021 tentang Pedoman Pelaksanaan Sistem Manajemen Anti Penyuapan. 3. Surat Edaran Direksi PT Bank Raya Indonesia, Tbk. No.SE: B.36/DIR.02.04/OJL/09/2021 tanggal 21 September 2021 tentang Pedoman Operasional Sistem Manajemen Anti Penyuapan.
Anti-Bribery and Gratuity Control Guidelines	1. PT Bank Raya Indonesia, Tbk. Board of Directors Decree No.Kpts.: B.363/DIR.01.02/ OJL/08/2021 dated August 9, 2021 about Anti-Bribery Policy and Gratification Control. 2. Decree No.Kpts: B.669/DIR.02.04/OJL/LCA/12/2021 of the Board of Directors of PT Bank Raya Indonesia, Tbk. dated December 16, 2021 on Guidelines for the Implementation of the Anti-Bribery Management System. 3. Circular No. SE: B.36/DIR.02.04/OJL/09/2021 of PT Bank Raya Indonesia, Tbk. dated September 21, 2021 on Operational Guidelines for Anti-Bribery Management Systems.

Kebijakan dan Prosedur Policies and Mechanisms	Penerapan Implementation
Pedoman Sistem Pelaporan Pelanggaran (<i>Whistleblowing System</i>)	Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts.:B.359/ DIR.01.02/ OJL/08/2021 tanggal 5 Agustus 2021 tentang Kebijakan Sistem Pelaporan Pelanggaran (<i>Whistleblowing System</i>).
Whistleblowing System Guidelines	PT Bank Raya Indonesia, Tbk. Board of Directors Resolution No.Kpts.:B.359/DIR.01.02/ OJL/08/2021 dated August 5, 2021 addressing the Whistleblowing System Policy.
Petunjuk Pelaksanaan Pengadaan Barang Dan Jasa	1. Surat Keputusan Direksi PT Bank Raya Indonesia Tbk. No.Kpts. B.14/DIR.01.05/ JLN/09/2020 tanggal 18 September 2020 tentang Pedoman Pengadaan Barang dan Jasa. 2. Surat Keputusan Direksi PT Bank Raya Indonesia Tbk. No.Kpts. B.353/DIR.02.24/ OJL/08/2021 tanggal 4 Agustus 2021 tentang Pedoman Pengadaan Barang dan Jasa (Revisi)
Instructions for the Implementation of the Procurement of Goods and Services	1. Decree No.Kpts. B.14/DIR.01.05/JLN/09/2020 of the Board of Directors of PT Bank Raya Indonesia Tbk dated September 18, 2020 about Guidelines for the Procurement of Goods and Services. 2. PT Bank Raya Indonesia Tbk. Board of Directors Decree No.Kpts. B.353/DIR.02.24/ OJL/08/2021 dated August 4, 2021 about Guidelines for Goods and Services Procurement (Revised)
Pedoman Komite Manajemen Risiko	09 September 2016 diperbarui tanggal 31 Agustus 2021 melalui Surat Keputusan Direksi PT Bank Raya Indonesia Tbk. No. Kpts: B. 460/Dir.01.02/OJL/08/2021 tentang Kebijakan Komite Manajemen Risiko (<i>Risk Management Committee</i>).
Risk Management Committee Guidelines	September 9, 2016 revised on August 31, 2021 according to PT Bank Raya Indonesia Tbk. Decree No. Kpts: B. 460/Dir.01.02/OJL/08/2021 addressing the Risk Management Committee's Policy.
Pedoman Komite Kebijakan Perkreditan	Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk. No.Kpts.B. 20/DIR.01.02/OPK/01/2022 tanggal 20 Januari 2022 tentang Komite Kebijakan Perkreditan
Credit Policy Committee Guidelines	Decree No.Kpts.B. 20/DIR.01.02/OPK/01/2022 of the Board of Directors of PT Bank Raya Indonesia, Tbk. dated January 20, 2022 addressing the Credit Policy Committee.
Pedoman Komite Kebijakan Kredit & Pengembangan Produk	30 November 2017 diperbarui tanggal 29 Mei 2020 melalui Surat Keputusan Direksi PT Bank Raya Indonesia Tbk. No. Kpts. B.47/DIR.03.05/ADK/5/2020 tentang Komite Kebijakan Kredit Dan Pengembangan Produk (K3P2).
Credit Policy & Product Development Committee Guidelines	November 30, 2017 revised on May 29, 2020 by PT Bank Raya Indonesia Tbk. Board of Directors Decree No. Kpts. B.47/DIR.03.05/ADK/5/2020 addressing the Credit Policy and Product Development Committee (K3P2).
Pedoman Komite Kredit	Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts. B.46/DIR.03.04/ADK/05/2020 tanggal 29 Mei 2020 tentang Komite Kredit.
Credit Committee Guidelines	PT Bank Rakyat Indonesia Agroniaga Tbk. Board of Directors Resolution No. Kpts. B.46/ DIR.03.04/ADK/05/2020 dated May 29, 2020 establishing the Credit Committee.
Komite ALCO	27 Oktober 2016 diperbarui tanggal 26 Maret 2020 melalui Keputusan Direksi PT Bank Raya Indonesia Tbk. No. Kpts. B.28/DIR.03.04/CMG/03/2020 tentang Asset And Liability Committee (ALCO).
ALCO Committee	October 27, 2016 revised on 26 March 2020 by PT Bank Raya Indonesia Tbk's Board of Directors Decree No. Kpts. B.28/DIR.03.04/CMG/03/2020 about the Asset And Liability Committee (ALCO).

Kebijakan dan Prosedur Policies and Mechanisms	Penerapan Implementation
Komite Pengarah Teknologi dan Informasi	19 Maret 2009 diperbarui tanggal 3 Agustus 2021 melalui Surat Keputusan Direksi PT Bank Raya Indonesia Tbk. No. Kpts. 35/DIR.01.02/OJL/TSI/08/2021 tentang Penetapan Komite Pengarah Teknologi Sistem Informasi.
Information Technology Steering Committee	March 19, 2009 amended on August 3, 2021 by PT Bank Raya Indonesia Tbk's Board of Directors Decree No. Kpts. 35/DIR.01.02/OJL/TSI/08/2021 establishing the Information System Technology Steering Committee.
Pedoman Aktivitas Hubungan Investor	16 Desember 2014 melalui Surat No B.04/DIR.01.02/SKp/12/2014 tentang Kebijakan Pelayanan Dan Pengelolaan Informasi PT Bank Rakyat Indonesia Agroniaga Tbk.
Investor Relations Activities Guidelines	December 16, 2014, through Letter No. B.04/DIR.01.02/SKp/12/2014 pertaining to PT Bank Rakyat Indonesia Agroniaga Tbk's Information Services and Management Policy.
Pedoman Penyusunan Rencana Bisnis Bank	Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No Kpts. B.29/DIR.03.04/CMG/05/2020 tanggal 28 Mei 2020 tentang Petunjuk Pelaksanaan Rencana Bisnis Bank.
Guidelines for Preparation of Bank Business Plans	PT Bank Rakyat Indonesia Agroniaga Tbk. Board of Directors Decree No. Kpts. B.29/DIR.03.04/CMG/05/2020 dated May 28, 2020 establishing Guidelines for the Implementation of Bank Business Plans.
Pedoman Pengelolaan Kebijakan Akuntansi	Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No Kep : B.09/DIR.03.05/CMG/07/2020 tanggal 8 Juli 2020 tentang Kebijakan Akuntansi PSAK 71.
Guidelines for Management of Accounting Policies	Decree No. Kep: B.09/DIR.03.05/CMG/07/2020 of the Board of Directors of PT Bank Rakyat Indonesia Agroniaga Tbk dated July 8, 2020 about Accounting Policy PSAK 71.
Pedoman Kepegawaian Tentang Tata Tertib Pekerja	31 Juli 2012 diperbarui tanggal 31 Desember 2015 melalui Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts. 57/DIR.01.02/MSDM/XII/2015 tentang Pengaturan Kembali Mengenai Tindakan Atas Pelanggaran Disiplin Kategori Ringan Beserta Implikasinya Dan Matriks Tata Tertib Hukuman Disiplin.
Employment Guidelines on Worker Code of Conduct	July 31, 2012, as amended on December 31, 2015, by the Board of Directors of PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts. 57/DIR.01.02/MSDM/XII/2015 regarding the Reorganization of Actions for Minor Discipline Violations and Their Consequences, as well as the Disciplinary Punishment Order Matrix.
Pedoman Kepegawaian Tentang Penilaian Kinerja Pekerja	31 Januari 2005 diperbarui tanggal 30 Januari 2014 melalui Surat Keputusan Direksi PT Bank Rakyat Indonesia Agroniaga Tbk. No. Kpts. 16/DIR.01.02/01/2014 tentang Pengaturan Kembali Kualifikasi Akhir Penilaian Kinerja Pekerja Dan Penggunaan Hasil Penilaian Untuk Reward Pekerja.
Employment Guidelines on Employee Performance Assessment	On January 30, 2014, the Board of Directors of PT Bank Rakyat Indonesia Agroniaga Tbk. issued Decree No. Kpts. 16/DIR.01.02/01/2014 about the Reorganisation of Final Qualifications for Employee Performance Assessment and the Use of Assessment Results for Employee Rewards.
Tanggung Jawab Sosial Perusahaan (Corporate Social Responsibility)	Surat Edaran No SE. B.01/DIR.01.03/SKP/01/2020 tanggal 22 Januari 2020 tentang Tanggung Jawab Sosial Perusahaan (Corporate Social Responsibility) PT Bank Rakyat Indonesia Agroniaga Tbk.
Corporate Social Responsibility	Circular Letter No. SE. B.01/DIR.01.03/SKP/01/2020 dated January 22, 2020 about PT Bank Rakyat Indonesia Agroniaga Tbk's Corporate Social Responsibility.

Governance Outcome

Hasil Tata Kelola (*governance outcome*) adalah manifestasi penerapan dan penegakan Tata Kelola yang berdampak positif terhadap penciptaan nilai (*value creation*) dan keberlangsungan Perusahaan.

Governance outcome is a result of the adoption and enforcement of Good Corporate Governance that has a beneficial influence on the Company's value generation and sustainability.

Roadmap GCG

Roadmap GCG

2020	2021 - 2022	2023 - 2024
System Development and Strengthen Compliance & Risk Culture 1. Penerapan SMART AML 2. Optimalisasi Aplikasi <i>Report Monitoring Improvement Risk Awareness</i> 3. Pengembangan modul MR 4. Mengkaji perlunya Pembentukan <i>Desk Manajemen Risiko</i> 5. Peningkatan kompetensi melalui pelatihan & training	Strengthen Compliance, risk Culture & Legal Awareness 7. <i>Improvement of Compliance Culture & GCG</i> 8. <i>Improvement Risk Culture:</i> a. RSCA dan <i>Risk Profile</i> Cabang sebagai alat bantu pengambilan keputusan b. Mengoptimalkan manajemen Insiden. 9. <i>Anti Money Laundering Awareness</i> 10. <i>Legal Awareness.</i>	Information & Consulting Center in Compliance and Risk Management 11. Membangun <i>library</i> secara online sebagai narasumber dan <i>guidance</i> agar dalam setiap pengambilan keputusan dan menyusun kebijakan tetap memenuhi prinsip kehati-hatian. 12. Melakukan pengelolaan keseimbangan antara bisnis dengan risiko melalui penentuan model analisa risiko yang tepat, menentukan <i>limit risk appetite</i>, evaluasi <i>risk</i> portofolio dan evaluasi ketersediaan sumber daya baik dari sisi kuantitas maupun kualitas. 13. <i>E-Learning</i> secara berkelanjutan.

Bank Raya telah menyusun *roadmap* penerapan GCG Periode 2020–2024. *Roadmap* tersebut terbagi menjadi 3 fase, yaitu fase pertama tahun 2020 dengan fokus pada *System Development and Strengthen Compliance & Risk Culture*, fase kedua tahun 2021–2022 dengan fokus pada *Strengthen Compliance, Risk Culture & Legal Awareness* dan fase ketiga tahun 2023–2024 dengan fokus pada *Information & Consulting Center in Compliance and Risk Management*.

Bank Raya has developed a timeline for the adoption of GCG from 2020 to 2024. The roadmap is divided into three phases: the first phase, which begins in 2020, focuses on system development and strengthens compliance and risk culture; the second phase, which begins in 2021–2022, focuses on strengthening compliance, risk culture, and legal awareness; and the third phase, which begins in 2023–2024, focuses on the Information & Consulting Centre's compliance and risk management capabilities.

Program GCG yang dilakukan pada tahun 2021:

1. Peningkatan kompetensi melalui pelatihan & training pendidikan yang diberikan secara berkala dan berkesinambungan kepada seluruh pekerja, baik mengenai GCG, Budaya Kepatuhan, Kode Etik, pengendalian gratifikasi dan anti penyuapan. Disamping itu, terhadap SDM di Bagian *Compliance* juga akan diberikan pelatihan maupun *enhancement* mengenai GCG agar dapat lebih meningkatkan kompetensi dan lebih optimal dalam mengawal pelaksanaan GCG di Bank Raya.
2. Digitalisasi proses pengujian prinsip kehati-hatian agar selaras dengan visi dan misi Bank Raya. Dan untuk lebih efisien dalam pelaksanaannya maka proses pengujian prinsip kehati-hatian akan dilakukan/dikompilasi secara digital. Pada tahap awal, semua dokumen Uji Kepatuhan akan disimpan dalam media digital agar lebih efektif dan efisien. Dan untuk selanjutnya proses Uji Kepatuhan juga akan dilakukan secara digital.
3. Peningkatan Budaya Kepatuhan dan penerapan Tata Kelola akan dilakukan dengan melaksanakan sosialisasi kembali terhadap Budaya Kepatuhan, Kode Etik, penerapan Tata Kelola, pengendalian gratifikasi dan anti penyuapan.
4. Telah mendapatkan rekomendasi dalam pelaksanaan sertifikasi ISO 37001:2016 Sistem Manajemen Anti Penyuapan (SMAP) dengan ruang lingkup sertifikasi Pengadaan Barang dan Jasa pada Bagian Umum dan Logistik, dengan Unit Kerja pendukung Divisi *Legal & Compliance*, Divisi *Human Capital*, Divisi Operasional, Jaringan dan Layanan, *Desk Enterprise Risk Management* dan Satuan Kerja Audit Internal.

GCG initiatives to be implemented in 2021:

1. Increased competency via regular and continuing training and educational sessions for all staff on GCG, Compliance Culture, Code of Ethics, gratification control, and anti-bribery. Additionally, HR in the Compliance Division will get training and development in GCG to help them further develop their competence and be more effective in supervising the implementation of GCG at Bank Raya.
2. To match the prudential principal testing procedure with Bank Raya's vision and purpose, we are digitising the process. And, to maximise efficiency, the precautionary principal testing procedure will be conducted/collated digitally. To begin, all Compliance Test documentation will be kept digitally to maximise their effectiveness and efficiency. Additionally, the Compliance Test procedure will be conducted online.
3. The Compliance Culture and Governance will be improved by re-socialization of the Compliance Culture, Code of Conducts, Governance implementation, gratification control, and anti-bribery.
4. Has been recommended to implement ISO 37001:2016 Anti-Bribery Management System (SMAP) certification with the scope of certification for the Procurement of Goods and Services in the General and Logistics Sections, as well as supporting Work Units for the Legal & Compliance Division, Human Capital Division, Operational Division, Network and Services Division, Enterprise Risk Management Desk, and Internal Audit Unit.

5. Telah mendapatkan rekomendasi dalam pelaksanaan sertifikasi ISO 9001:2015 Sistem Manajemen Mutu (SMM) pada Bagian <i>Compliance</i> dan Bagian <i>Anti Money Laundering</i> - Divisi <i>Legal & Compliance</i>. 6. Pada Tahun 2022 akan mulai diberlakukan penerapan Tata Kelola terhadap Unit Kerja baik Unit Kerja yang ada di Kantor Pusat maupun di Kantor Cabang atau <i>Community Branch</i>. Diharapkan pelaksanaannya akan mulai berjalan pada Triwulan I Tahun 2022.	5. Has been recommended for implementation of the ISO 9001:2015 Quality Management System(QMS) certification in the Compliance Section and Anti-Money Laundering Section of the Legal & Compliance Division. 6. In 2022, Good Corporate Governance for Work Units will be implemented, both at Head Office Work Units and throughout Branch Offices or Community Branches. The implementation is expected to begin in the first quarter of 2022.

Peningkatan Kualitas Penerapan GCG

Improving the Implementation Quality of GCG

Bank Raya berkomitmen untuk menjadikan prinsip GCG sebagai landasan utama dalam setiap kegiatan operasionalnya. Karena itu, Bank Raya berkomitmen untuk terus meningkatkan kualitas penerapan GCG dari waktu ke waktu. Komitmen tersebut salah satunya diwujudkan dengan terus melakukan perbaikan dan penyempurnaan terhadap struktur, organ dan mekanisme Tata Kelola yang berlaku di Bank. Selain itu, upaya peningkatan kualitas penerapan GCG juga dilakukan dengan melakukan penilaian kualitas penerapan GCG secara konsisten setiap tahun.

Bank Raya melakukan penilaian penerapan GCG melalui 2 (dua) model penilaian yaitu *self-assessment* dan *eksternal assessment*.

Bank Raya is dedicated to incorporating GCG concepts throughout all of its operating processes. As a result, Bank Raya is dedicated to periodically upgrading the quality of GCG implementation. One of these responsibilities is fulfilled by continuing to develop and refine the Bank's structure, organs, and governance processes. Additionally, efforts are made to enhance the quality of GCG implementation by reviewing the quality of GCG implementation on a constant annual basis.

Bank Raya evaluates the GCG implementation process using two (two) assessment methodologies, namely self-assessment and external evaluation.

Self-Assessment

Self-Assessment

Pelaksanaan penilaian GCG sendiri yang dilakukan oleh Bank raya mengacu pada Surat Edaran OJK No.13/SE0JK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum. Bank harus melakukan penilaian sendiri (*self-assessment*) secara komprehensif dan berkala agar dapat menetapkan rencana tindak lanjut yang meliputi tindakan korektif (bila diperlukan) dengan memperhatikan 11 (sebelas) faktor penilaian yaitu:

1. Pelaksanaan tugas dan tanggung jawab Direksi
2. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris
3. Kelengkapan dan pelaksanaan tugas komite
4. Penanganan benturan kepentingan
5. Penerapan fungsi kepatuhan
6. Penerapan fungsi audit intern
7. Penerapan fungsi audit ekstern
8. Penerapan Manajemen Risiko termasuk sistem pengendalian intern, penyediaan dana kepada pihak terkait (*related party*) dan penyediaan dana besar (*large exposure*)
9. Transparansi kondisi keuangan dan non keuangan Bank
10. Laporan pelaksanaan tata kelola dan pelaporan internal
11. Rencana strategis Bank

Berikut adalah hasil penilaian sendiri pelaksanaan GCG Bank Raya Tahun 2021:

Bank Raya conducted the GCG evaluation in accordance with OJK Circular Letter No.13/SE0JK.03/2017 on the Implementation of Good Corporate Governance for Commercial Banks. Banks must conduct a complete and periodic self-evaluation in order to develop a follow-up plan that includes remedial measures (if required) based on 11 (eleven) assessment variables, including the following:

1. Fulfilment of the Board of Directors' duties and obligations
2. Fulfilment of the Board of Commissioners' duties and responsibilities
3. Completeness and execution of committee responsibilities
4. Managing potential conflicts of interest
5. Establishment of a compliance function
6. Internal audit function implementation
7. Establishment of an external audit role
8. Risk management, including the establishment of an internal control system, the supply of money to connected parties, and the provision of big amounts (large exposure)
9. Availability of information on the Bank's financial and non-financial circumstances
10. Compile a report on the governance and internal reporting processes.
11. Strategic strategy for the bank

The following are the findings from Bank Raya's self-assessment of its GCG implementation in 2021:

Hasil Penilaian Sendiri (Self Assessment) Penerapan Tata Kelola Result of Self-Assessment of Governance Implementation		
Peringkat Rating		Definisi Peringkat Rating Definition
Individual	2	Mencerminkan Manajemen Bank telah melakukan penerapan Tata Kelola yang secara umum Baik. Hal ini tercermin 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.
Individual		Representing the management of the Bank's commitment to comprehensive good governance. This is shown by correct application of the Governance principles. If there are gaps in the governance principles' execution, these defects are often modest and may be corrected by ordinary management actions.
Konsolidasi	2	Mencerminkan Manajemen Bank dan Entitas Anak telah melakukan penerapan <i>Good Corporate Governance</i> pada aspek <i>governance structure</i> , <i>governance process</i> dan <i>governance outcome</i> yang secara umum Baik. Hal ini tercermin dari pemenuhan yang memadai atas prinsip-prinsip <i>Good Corporate Governance</i> . Apabila terdapat kelemahan dalam penerapan prinsip <i>Good Corporate Governance</i> , maka secara umum kelemahan tersebut kurang signifikan dan dapat segera dilakukan perbaikan oleh Manajemen Bank dan Entitas Anak.
Consolidation		Reflecting that the Management of the Bank and its Subsidiaries has embraced Excellent Corporate Governance in the categories of governance structure, governance process and governance outcomes which are generally excellent. This is reflected in the adequate accomplishment of the principles of Good Corporate Governance. If there are inadequacies in the execution of the principles of Good Corporate Governance, in general these weaknesses are less significant and may be promptly corrected by the Management of the Bank and Subsidiaries.
Analisis In-Depth Analysis		

Secara umum, hasil penilaian sendiri (*self assessment*) atas pelaksanaan penerapan *Good Corporate Governance* pada Bank Raya dan perusahaan induk telah berjalan dengan Baik. Hal ini tercermin dari pemenuhan yang memadai atas prinsip-prinsip *Good Corporate Governance*.

In overall, the self-assessment of Bank Raya and its parent company's adoption of Good Corporate Governance went well. This is shown by the company's compliance with the principles of Good Corporate Governance.

Rating Tingkat Kesehatan Bank Bank's Risk-Based Rating

Penilaian Tingkat Kesehatan Bank Raya merujuk kepada Peraturan OJK Nomor 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum dan Peraturan OJK Nomor 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum. Tingkat Kesehatan Bank merupakan hasil penilaian kualitatif yang terdiri dari profil risiko, penerapan tata kelola perusahaan, rentabilitas dan permodalan.

The evaluation of the soundness level of Bank Raya relates to FSA Regulation Number 4/POJK.03/2016 concerning Assessment of the Soundness Level of Commercial Banks and OJK Regulation Number 55/POJK.03/2016 concerned the Implementation of Governance for Commercial Banks. Bank Soundness Level is the outcome of a qualitative evaluation consisting of risk profile, application of corporate governance, profitability and capital.

Faktor Penilaian per 31 Desember 2021 Rating Factor as of December 31, 2021	Penilaian OJK FSA's Evaluation
Profil Risiko Risk Profile	2
Good Corporate Governance Good Corporate Governance	2
Rentabilitas Profitability	4
Permodalan Capital	2
Kesimpulan Peringkat Komposit Composite Rating Conclusion	2

Penilaian Pihak Eksternal External Party Assessment

Untuk mendapatkan *feedback* atau penilaian akan pelaksanaan penerapan GCG dalam Perseroan, Bank Raya tidak hanya melaksanakan *self assessment* seperti ketentuan regulator tetapi juga meminta pihak ketiga dalam menilai hasil penerapan GCG.

To acquire feedback or an evaluation of the execution of GCG implementation in the Company, Bank Raya not only carries out a self-assessment as specified by the regulator but also requests a third party to review the outcomes of GCG implementation.

Corporate Governance Perception Index (CGPI)

Metode penilaian CGPI menggunakan 3 (tiga) aspek penilaian meliputi struktur governansi (*governance structure*), proses governansi (*governance process*) dan hasil governansi (*governance outcome*) dan melalui 2 (dua) tahap penilaian yaitu analisis melalui metode pengisian kuesioner (*self assessment*) dan penilaian sistem dokumentasi perusahaan serta observasi melalui paparan eksekutif dan diskusi dengan organ perusahaan.

Corporate Governance Perception Index (CGPI)

The CGPI assessment method uses 3 (three) assessment aspects including the governance structure, the governance process and governance outcomes and through 2 (two) stages of assessment, namely analysis through the method of filling out a questionnaire (self-assessment) and assessment of the company's documentation system and observation through executive exposure and discussions with company organs.

Corporate Governance Perception Index (CGPI) adalah program riset dan pemeringkatan penerapan GCG pada perusahaan di Indonesia yang mendorong para pelaku usaha meningkatkan kualitas penerapan GCG melalui perbaikan yang berkesinambungan dengan melaksanakan evaluasi dan *benchmarking*. Program ini dilaksanakan oleh *Indonesia Institute of Corporate Governance* (IICG) bekerjasama dengan Majalah SWA.

The *Corporate Governance Perception Index* (CGPI) is a study and rating programme for the implementation of GCG in enterprises in Indonesia that encourages business actors to enhance the quality of GCG implementation via continuous improvement by performing evaluations and benchmarking. This initiative is administered by the *Indonesia Institute of Corporate Governance* (IICG) in partnership with SWA Magazine.

Metode Penilaian

Metode penilaian CGPI terdiri dari 4 (empat) tahapan penilaian yang meliputi *self-assessment*, penilaian dokumen, penilaian makalah dan observasi.

1. Self-assessment

Penilaian mandiri oleh perusahaan mengenai kualitas pelaksanaan GCG di lingkup internal perusahaan. Daftar responden terdiri dari 2 (dua) kalangan responden yakni responden internal dan responden eksternal.

Assessment Method

The CGPI evaluation technique comprises of 4 (four) phases of assessment which include self-assessment, document assessment, paper assessment and observation.

1. Self-assessment

Self-assessment by the firm about the quality of GCG implementation in the business's internal scope. The list of respondents comprises of 2 (two) respondents, namely internal respondents and external respondents.

2. Kelengkapan Dokumen

Pemenuhan persyaratan penilaian dengan menyerahkan berbagai dokumen yang telah dimiliki perusahaan dalam pelaksanaan GCG dan dokumen lainnya terkait dengan tema penilaian.

3. Penyusunan Makalah

Penyusunan makalah oleh perusahaan yang menjelaskan serangkaian proses dan program implementasi GCG di perusahaan dan upaya manajemen terkait dengan tema penilaian.

4. Observasi

Tahapan akhir penilaian berupa peninjauan langsung oleh tim penilaian CGPI untuk memastikan bahwa proses pelaksanaan serangkaian program pelaksanaan GCG dan upaya manajemen terkait dengan tema penilaian.

2. Completeness of Documents

Fulfilment of assessment requirements by providing different papers that the firm has in the execution of GCG and other documents relevant to the topic of the assessment.

3. Preparation of Papers

Preparation of a report by the firm that details a series of procedures and programmes for implementing GCG in the company and management's efforts connected to the topic of the assessment.

4. Observation

The last step of the assessment is in the form of a direct evaluation by the CGPI assessment team to verify that the process of executing a series of GCG implementation programmes and management initiatives is connected to the topic of the assessment.

Kriteria dan indikator penilaian CGPI terdiri dari sejumlah hal, yaitu:

1. Analisis Instrumen dan Dokumen

- Instrumen riset dan pemeringkatan
- Penilaian dokumen

2. Observasi (Aspek Struktur Tata Kelola)

3. Penilaian atas kecukupan struktur dan infrastruktur perusahaan dalam mengelola transformasi model bisnis yang menciptakan nilai bagi para Pemangku Kepentingan sesuai dengan prinsip Tata Kelola. (Aspek Proses Tata Kelola)

4. Penilaian terhadap efektivitas sistem dan mekanisme yang dimiliki perusahaan dalam mengelola transformasi model bisnis yang menciptakan nilai bagi para Pemangku Kepentingan sesuai dengan prinsip tata Kelola. (Aspek Hasil Tata Kelola)

5. Hasil Tata Kelola menggambarkan penilaian terhadap luaran, kualitas luaran, dampak dan manfaat yang dimiliki perusahaan dari proses pengelolaan transformasi model bisnis yang menciptakan nilai bagi para pemangku kepentingan sesuai dengan prinsip Tata Kelola.

The CGPI evaluation criteria and indicators consist of a number of elements, namely:

1. Instrument and Document Analysis

- Research and grading tools
- Document assessment

2. Observation (Aspect of Governance Structure)

3. Assessment of the suitability of the company's structure and infrastructure in managing the transformation of the business model that provides value for the Stakeholders in line with the principles of Governance. (Aspects of the Governance Process)

4. Assessment of the efficacy of the company's processes and methods in managing the transformation of the business model that provides value for the Stakeholders in line with the principles of Governance. (Aspects of Governance Results)

5. Governance findings reflect an evaluation of the outputs, quality of outputs, effects and advantages of the organisation from the business model transformation management process that produces value for stakeholders in line with the principles of Governance.

Hasil penilaian CGPI berupa rentang skor yang dicapai oleh perusahaan peserta dengan kategorisasi atas tingkat kualitas implementasi GCG yang menggunakan istilah "terpercaya".

The findings of the CGPI evaluation are in the form of a range of scores attained by participating organisations with classification of the quality level of GCG implementation using the word "trusted".

Rentang nilai Skor CGPI

55,00 s.d 69,99% = Cukup terpercaya

70,00 s.d 84,99% = terpercaya

84,99 s.d 99,99% = Sangat terpercaya

CGPI score range

55.00 to 69.99% = Quite dependable

70.00 to 84.99% = dependable

84.99 to 99.99% = Very dependable

Hasil Penilaian CGPI Tahun 2021

2021 CGPI Assessment Results

Pada Tahun 2019 Bank Raya (d/h BRI Agro) berhasil meraih penghargaan sebagai perusahaan dengan kategori "trusted". Untuk Tahun 2021 Bank Raya tidak mengikuti ajang CGPI Award. Namun demikian, pada Tahun 2021 Bank Raya melaksanakan sertifikasi ISO 37001:2016 Sistem Manajemen Anti Penyuapan (SMAP) dan ISO 9001:2015 Sistem Manajemen Mutu (SMM). Atas keikutsertaan tersebut, Bank Raya direkomendasikan untuk :

1. Mendapatkan sertifikasi ISO 37001:2016 Sistem Manajemen Anti Penyuapan (SMAP) dengan ruang lingkup sertifikasi Pengadaan Barang dan Jasa pada Bagian Umum dan Logistik, dengan Unit Kerja pendukung Divisi *Legal & Compliance*, Divisi *Human Capital*, Divisi Operasional, Jaringan dan Layanan, *Desk Enterprise Risk Management* dan Satuan Kerja Audit Internal.
2. Mendapatkan sertifikasi ISO 9001:2015 Sistem Manajemen Mutu (SMM) pada Bagian *Compliance* dan Bagian *Anti Money Laundering*-Divisi *Legal & Compliance*.

Sebagai informasi, keikutsertaan Bank Raya pada ISO 37001:2016 SMAP dan ISO 9001:2015 SMM merupakan salah satu proses peningkatan dalam penerapan Tata Kelola Perusahaan yang Baik di Bank Raya.

In 2019 Bank Raya (previously BRI Agro) got an award as a firm with the "trusted" category. For 2021, Bank Raya will not participate in the CGPI Award ceremony. However, in 2021 Bank Raya implemented the accreditation of ISO 37001:2016 Anti-Bribery Management System (SMAP) and ISO 9001:2015 Quality Management System (QMS) (QMS). For this participation, Bank Raya is encouraged to:

1. Obtained ISO 37001:2016 Anti-Bribery Management System (SMAP) certification with the scope of certification for the Procurement of Goods and Services in the General and Logistics Section, with supporting Work Units for the Legal & Compliance Division, Human Capital Division, Operational Division, Network and Services, Desk Enterprise Risk Management and Internal Audit Unit.
2. Obtained ISO 9001:2015 Quality Management System (QMS) accreditation in the Compliance Section and Anti Money Laundering Section - Legal & Compliance Division.

For information, Bank Raya's involvement in ISO 37001:2016 SMAP and ISO 9001:2015 QMS is one of the improvement procedures in the implementation of Good Corporate Governance at Bank Raya.

Penerapan Aspek dan Prinsip Tata Kelola Perusahaan Sesuai Ketentuan Otoritas Jasa Keuangan

Application of Corporate Governance Principles and Aspects in Accordance With The Financial Services Authority's Terms

Berdasarkan Peraturan OJK Nomor 21/POJK.04/2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka dan Surat Edaran OJK Nomor 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka, Pedoman Tata Kelola mencakup 5 (lima) aspek, 8 (delapan) prinsip dan 25 (dua puluh lima) rekomendasi penerapan aspek dan prinsip tata kelola perusahaan yang baik.

Rekomendasi penerapan aspek dan prinsip tata kelola perusahaan yang baik dalam Pedoman Tata Kelola adalah standar penerapan aspek dan prinsip tata kelola perusahaan yang baik yang harus diterapkan oleh Perseroan.

The Governance Guidelines cover 5 (five) aspects, 8 (eight) principles, and 25 (twenty-five) recommendations for the implementation of aspects and principles of good corporate governance, according to OJK Regulation Number 21/POJK.04/2015 concerning Implementation of Public Company Governance Guidelines and FSA Circular Letter Number 32/SEOJK.04/2015 concerning Public Company Governance Guidelines.

The Governance Guidelines' recommendations for the implementation of elements and principles of good corporate governance are standards for the Company to follow when implementing aspects and principles of good corporate governance.

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
1	Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham; Aspect 1: Public Company Relations with Shareholders in Ensuring Shareholders' Rights;			
	Prinsip 1 Meningkatkan Nilai Penyelenggaraan RUPS Principle 1 Increasing the Value of the GMS	1. Perusahaan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (<i>voting</i>) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham. Company has a technical method or procedure for voting (<i>voting</i>) both openly and privately that prioritizes independence and the interests of Shareholders.	Mekanisme pengambilan keputusan dalam RUPS di Bank Raya dilakukan dengan cara pengumpulan suara (<i>voting</i>), dimana Ketua Rapat memberikan waktu kepada para Pemegang Saham/kuasanya untuk menyampaikan pendapat dan/menanyakan dan/membahas hal-hal yang berkaitan dengan masing-masing mata acara rapat melalui kartu suara. Keputusan akan diambil berdasarkan suara terbanyak. The decision-making mechanism in the RUPS at Bank Raya is carried out by means of voting, where the Chairperson of the Meeting gives time to the Shareholders/proxies to express opinions and/ask and/discuss matters relating to each meeting agenda through sound card. Decisions will be made by majority vote.	Comply
		2. Seluruh anggota Direksi dan anggota Dewan Komisaris Perusahaan Terbuka hadir dalam RUPS Tahunan. All members of the Board of Directors and members of the Board of Commissioners of a Public Company attended the Annual GMS.	Seluruh anggota Direksi dan anggota Dewan Komisaris hadir dalam RUPS baik Tahunan maupun Luar Biasa. All members of the Board of Directors and members of the Board of Commissioners are present at the Annual and Extraordinary GMS.	Comply
		3. Ringkasan risalah RUPS tersedia dalam Situs Web Perusahaan Terbuka paling sedikit selama 1 (satu) tahun. The summary of the minutes of the GMS is available on the Public Company Website for at least 1 (one) year.	Tersedia di website perusahaan : www.bankraya.co.id Available on the company website: www.bankraya.co.id	Comply

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
	Prinsip 2 Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor.	4. Perusahaan Terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor. The Public Company has a communication policy with Shareholders or investors.	Perusahaan memiliki kebijakan terkait dengan keterbukaan informasi seperti tertuang dalam Surat No B.04/DIR.01.02/SKP/12/2014 tanggal 16 Desember 2014 perihal: Kebijakan Pelayanan dan Pengelolaan Informasi PT Bank Raya Indonesia Tbk. The Company has policies related to information disclosure as stated in Letter No. B.04/DIR.01.02/SKP/12/2014 dated December 16, 2014 regarding: Information Services and Management Policy of PT Bank Raya Indonesia Tbk.	Comply
	Principle 2 Improving the Quality of Public Company Communication with Shareholders or Investors.	5. Perusahaan Terbuka mengungkapkan kebijakan komunikasi Perusahaan Terbuka dengan Pemegang Saham atau investor dalam Situs Web. The Public Company discloses the Public Company's communication policy with Shareholders or investors on the Website.	Tersedia di website perusahaan : www.bankraya.co.id Available on the company website: www.bankraya.co.id	Comply
II	Aspek 2: Fungsi dan Peran Dewan Komisaris Aspect 2: Functions and Roles of the Board of Commissioners			
	Prinsip 3 Memperkuat Keanggotaan dan Komposisi Dewan Komisaris	6. Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perusahaan Terbuka.	Sebagaimana dalam Anggaran Dasar Perseroan, mekanisme penentuan jumlah Dewan Komisaris dilakukan dengan mempertimbangkan <i>best practice</i> (peers grup perbankan) dimana Bank Buku II dengan total Aset selevel Perseroan maksimum memiliki jumlah Komisaris sebanyak 5 orang dan Direksi 5 orang dan tidak melebihi jumlah Direksi. Hal ini telah sesuai dengan POJK No.55/POJK.03/2016 tanggal 7 Desember 2016 tentang penerapan tata Kelola bagi Bank Umum. Berdasarkan hasil RUPS tanggal 9 April 2020 sebagaimana tercantum dalam Akta Pernyataan Keputusan Rapat No.14 tanggal 19 April 2021 yang dibuat dihadapan M. Nova Faisal, SH. M.Kn., Notaris di Jakarta.	Comply
	Principle 3 Strengthening the Membership and Composition of the Board of Commissioners	The determination of the number of members of the Board of Commissioners takes into account the conditions of the Public Company.	As in the Company's Articles of Association, the mechanism for determining the number of the Board of Commissioners is carried out by taking into account best practice (peers banking group) where the Book II Bank with total assets at the level of the Company has a maximum number of 5 Commissioners and 5 Directors and does not exceed the number of Directors.	Comply

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
			This is in accordance with POJK No.55/POJK.03/2016 dated December 7, 2016 concerning the implementation of Good Corporate Governance for Commercial Banks. Based on the results of the GMS on April 9, 2020 as stated in the Deed of Meeting Resolution No. 14 dated April 19, 2021 made before M. Nova Faisal, SH. M.Kn., Notary in Jakarta.	
		7. Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	Penentuan komposisi anggota Dewan Komisaris telah memperhatikan keragaman keahlian, pengetahuan dan pengalaman, termasuk usia sesuai dengan kebutuhan perusahaan. Anggota Dewan Komisaris memiliki kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawabnya serta mampu mengimplementasikan kompetensi yang dimilikinya dalam pelaksanaan tugas dan tanggung jawabnya.	Comply
		The determination of the composition of the members of the Board of Commissioners takes into account the diversity of expertise, knowledge, and experience required.	The determination of the composition of the members of the Board of Commissioners has taken into account the diversity of expertise, knowledge and experience, including age according to the needs of the company. Members of the Board of Commissioners have adequate competence and are relevant to their positions to undertake their duties and responsibilities and are able to implement their competencies in carrying out their duties and responsibilities.	
4	Prinsip 4 Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.	8. Dewan Komisaris mempunyai kebijakan penilaian sendiri (<i>Self Assessment</i>) untuk menilai kinerja Dewan Komisaris.	Kebijakan terkait dengan <i>self assessment</i> Dewan Komisaris tertuang dalam kebijakan <i>self Assessment</i> GCG perusahaan yang dilakukan secara berkala setiap 6 (enam) bulan sekali.	Comply
	Principle 4 Improving the Quality of Duties and Responsibilities of the Board of Commissioners.	The Board of Commissioners has a self-assessment policy to assess the performance of the Board of Commissioners.	Policies related to the Board of Commissioners' self - assessment are contained in the company's GCG self- assessment policy which is carried out regularly every 6 (six) months.	
		9. Kebijakan penilaian sendiri (<i>Self Assessment</i>) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan Perusahaan Terbuka.	Sebagaimana diungkapkan dalam Bab Tata Kelola dan Laporan Dewan Komisaris dalam Laporan Tahunan ini.	Comply
		The self-assessment policy to assess the performance of the Board of Commissioners is disclosed through the Public Company Annual Report.	As disclosed in the Corporate Governance Chapter and Report of the Board of Commissioners in this Annual Report.	
		10. Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.	Sebagaimana diatur dalam Anggaran Dasar Perseroan dan dalam Pedoman Kerja Dewan Komisaris.	Comply
		The Board of Commissioners has a policy regarding the resignation of members of the Board of Commissioners if they are involved in financial crimes.	As stipulated in the Company's Articles of Association and in the Work Guidelines for the Board of Commissioners.	

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
		11. Dewan Komisaris atau Komite yang menjalankan fungsi Nominasi dan Remunerasi menyusun kebijakan suksesi dalam proses Nominasi anggota Direksi. The Board of Commissioners or the Committee that carries out the Nomination and Remuneration function shall formulate a succession policy in the process of nominating members of the Board of Directors.	Dewan Komisaris yang menjadi anggota Komite Remunerasi dan Nominasi telah menyusun kebijakan dan kriteria yang dibutuhkan dalam proses Nominasi calon anggota Direksi, dan telah diterapkan dalam penentuan Calon Direksi Perseroan. The Board of Commissioners, who is a member of the Remuneration and Nomination Committee, has developed the policies and criteria needed in the nomination process for candidates for the Board of Directors, and has been applied in determining the Candidates for the Company's Board of Directors.	Comply
III Aspek 3: FUNGSI DAN PERAN DIREKSI Aspect 3: FUNCTIONS AND ROLE OF THE BOARD OF DIRECTORS				
	Prinsip 5 Memperkuat Keanggotaan dan Komposisi Direksi. Principle 5 Strengthening the Membership and Composition of the Board of Directors.	12. Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perusahaan Terbuka serta efektifitas dalam pengambilan keputusan. The determination of the number of members of the Board of Directors takes into account the conditions of the Public Company and the effectiveness in making decisions.	Sebagaimana dalam Anggaran Dasar Perseroan, mekanisme penentuan jumlah Direksi dilakukan dengan mempertimbangkan <i>best practice</i> (peers grup perbankan) dimana Bank Buku II dengan total Aset selevel Perseroan maksimum memiliki jumlah Direksi sebanyak 5 orang. Hal ini telah sesuai dengan POJK No.55/POJK.03/2016 tanggal 7 Desember 2016 tentang penerapan tata Kelola bagi Bank Umum. Surat Keputusan Direksi Bank Raya No.Kpts.B.32/DIR.01.03/KMrH/IX/2017 tanggal 28 September 2017 tentang Kebijakan Penerapan Tata Kelola Perusahaan yang Baik dan Surat Keputusan Direksi No.Kpts B.01/DIR.03.04/CMG/056/2020 tanggal 5 Mei 2020 tentang Penetapan Kembali Struktur Organisasi PT Bank Raya Indonesia Tbk. As in the Company's Articles of Association, the mechanism for determining the number of Directors is carried out by taking into account best practice (peers banking group) where Book II Banks with total assets at the level of the Company have a maximum number of 5 Directors. This is in accordance with POJK No.55/POJK.03/2016 dated December 7, 2016 concerning the implementation of Good Corporate Governance for Commercial Banks. Decree of the Board of Directors of Bank Raya No.Kpts.B.32 /DIR.01.03/KMrH/IX/2017 dated September 28, 2017 concerning Policy for the Implementation of Good Corporate Governance and Decree of the Board of Directors No.Kpts B.01 / DIR .03.04 / CMG /056/2020 dated May 5, 2020 concerning Re-determination of the Organizational Structure of PT Bank Raya Indonesia Tbk.	Comply

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
		13. Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan. The determination of the composition of the members of the Board of Directors takes into account the diversity of expertise, knowledge and experience required.	Penentuan komposisi anggota Direksi telah memperhatikan keberagaman keahlian, pengetahuan, usia dan pengalaman sesuai dengan kebutuhan perusahaan. Seluruh Direksi memiliki kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawabnya serta mampu mengimplementasikan kompetensi yang dimilikinya dalam pelaksanaan tugas dan tanggung jawabnya. Hal ini berdasarkan kompetensi yang tertuang dalam Daftar riwayat Hidup masing-masing anggota Direksi. The determination of the composition of the members of the Board of Directors has taken into account the diversity of expertise, knowledge, age and experience in accordance with the needs of the company. All Directors have adequate and relevant competencies to their positions to undertake their duties and responsibilities and are able to implement their competencies in carrying out their duties and responsibilities. This is based on the competencies contained in the curriculum vitae of each member of the Board of Directors.	Comply
		14. 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 have expertise and/or knowledge in accounting.	Direksi yang membawahi bidang Akuntansi dan Keuangan di Bank Raya adalah Direktur Operasional dan Keuangan dan memiliki pengetahuan, keahlian dan sertifikasi di bidang tersebut. The Board of Directors in charge of Accounting and Finance at Bank Raya is the Director of Operations and Finance and has knowledge, expertise and certification in these fields.	Comply
6	Prinsip 6 Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi. Principle 6 Improving the Quality of Duties and Responsibilities of the Board of Directors.	15. Direksi mempunyai kebijakan penilaian sendiri (<i>Self Assessment</i>) untuk menilai kinerja Direksi. Assessment policy to assess the performance of the Board of Directors.	Kebijakan terkait dengan <i>self assessment</i> direksi tertuang dalam kebijakan <i>self Assessment</i> GCG perusahaan yang dilakukan secara berkala setiap 6 (enam) bulan sekali. Terdapat KPI (<i>Key Performance Indicator</i>) untuk Direksi yang dipergunakan untuk menilai kinerja Direksi. Policies related to self - assessment the board of directors is stated in the company's GCG self- assessment policy which is carried out regularly every 6 (six) months. There is a KPI (Key Performance Indicator) for the Board of Directors which is used to assess the performance of the Board of Directors.	Comply

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
		16. Kebijakan penilaian sendiri (<i>Self Assessment</i>) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan Perusahaan Terbuka.	Sebagaimana diungkapkan dalam Bab Tata Kelola Perusahaan dan dan Laporan Direksi.	Comply
		The self-assessment policy to assess the performance of the Board of Directors is disclosed through the Public Company's annual report.	As disclosed in the Corporate Governance Chapter and the Directors' Report.	
		17. Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.	Sebagaimana tertuang dalam Anggaran Dasar Perseroan dan Pedoman Kerja Direksi. Tidak ada anggota Direksi yang terlibat kejahatan keuangan.	Comply
		The Board of Directors has a policy regarding the resignation of members of the Board of Directors if they are involved in financial crimes.	As stated in the Company's Articles of Association and Work Guidelines for the Board of Directors. There are no members of the Board of Directors involved in financial crimes.	
IV	Aspek 4: Partisipasi Pemangku Kepentingan Aspect 4: Stakeholder Participation			
	Prinsip 7 Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan.	18. Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya <i>insider trading</i> .	Bank Raya memiliki kebijakan Pelayanan dan pengelolaan informasi PT Bank Raya Indonesia Tbk yang diatur dalam Surat No B.04/DIR.01.02/SKP/12/2014 yang diterbitkan pada tanggal 16 Desember 2014.	Comply
	Principle 7 Improving Corporate Governance Aspects through Stakeholder Participation.	The Public Company has a policy to prevent insider trading.	Bank Raya has a policy of service and information management of PT Bank Raya Indonesia Tbk which is regulated in Letter No B.04/DIR.01.02/SKP/12/2014 issued on December 16, 2014.	
		19. Perusahaan Terbuka memiliki kebijakan anti korupsi dan anti <i>fraud</i> .	Bank memiliki kebijakan Anti Fraud sesuai Surat Keputusan Bank Raya No.Kep: B.19/DIR.01.03/RMG/08/2020 tanggal 26 Agustus 2020 tentang Strategi Anti <i>Fraud</i> .	Comply
		The Public Company has an anti-corruption and anti- fraud policy.	The Bank has an Anti Fraud policy in accordance with Bank Raya Decree No. Kep: B. 19 /DIR.01.03 / RMG /08 /2020 dated August 26, 2020 concerning Anti Fraud Strategy.	

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
		20. Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau <i>vendor</i> . The Public Company has a policy regarding the selection and capacity building of suppliers or vendors.	Perusahaan memiliki kebijakan yang mengatur seleksi pemasok atau <i>vendor</i> yang diantaranya telah meliputi kriteria-kriteria tersebut yang tertuang dalam aturan Pengadaan Barang dan Jasa yaitu SK Direksi No. Kpts. B.353/DIR.02.04/OJL/08/2021 tanggal 8 Agustus 2021 tentang Pedoman Pengadaan Barang dan Jasa (Revisi). Pelaksanaan Pengadaan Barang dan Jasa telah sesuai dan mengikuti ketentuan yang ada. The company has a policy that regulates the selection of suppliers or vendors, which includes the criteria stated in the rules for the procurement of goods and services, namely the Decree of the Board of Directors No. Kpts. B. 353 /DIR.0 2 .04 /OJL/ 08 /20 21 dated August 8, 2021 regarding Guidance for Procurement of Goods and Services (Revised). The implementation of the procurement of goods and services is in accordance with the existing provisions.	Comply
		21. Perusahaan Terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur. The Public Company has a policy regarding the fulfillment of creditors' rights.	Perseroan dalam kedudukannya sebagai kreditur (Perseroan menerbitkan obligasi) memiliki kebijakan tentang pemenuhan hak-hak kreditur seperti tertuang dalam perjanjian dengan wali amanat. The Company in its position as a creditor (the Company issues bonds) has a policy regarding the fulfillment of creditor rights as stated in the agreement with the trustee.	Comply
		22. Perusahaan Terbuka memiliki kebijakan sistem <i>whistleblowing</i> . whistleblowing system policy.	Perusahaan memiliki kebijakan mengenai <i>whistleblowing system</i> sesuai dengan Surat Keputusan Direksi PT Bank Raya Indonesia Tbk No. Kpts.:B.359/DIR.01.02/OJL/08/2021 tanggal 5 Agustus 2021 tentang Kebijakan Sistem Pelaporan Pelanggaran (<i>Whistleblowing System</i>). The company has a policy regarding the whistleblowing system in accordance with the Decree of the Board of Directors of PT Bank Raya Indonesia Tbk No. Kpts.:B. 359 /DIR.01.02/ OJL / 08 /20 21 dated August 5, 2021 regarding the Whistleblowing System Policy.	Comply
		23. Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan The Public Company has a policy of providing long-term incentives to the Board of Directors and employees	Perusahaan memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan Karyawan sesuai dengan Surat Keputusan Bank No.Kpts. B.15/DIR.01.02/MSDM/KBKJ/12/2018 tanggal 10 Desember 2018 tentang program <i>Management and Employee Stock Option Plan</i> (MESOP) The company has a policy of providing long-term incentives to Directors and Employees in accordance with Bank Decree No. Kpts. B.15/ DIR.01.02/MSDM/KBKJ/12/2018 dated December 10, 2018 regarding the Management and Employee Stock Option Plan (ME SOP) program.	Comply

No	Prinsip Principle	Rekomendasi Recommendation	Penjelasan Penerapan di Bank Raya Explanation of Implementation at Bank Raya	Compliance Compliance
V	Aspek 5 : KETERBUKAAN INFORMASI Aspect 5: DISCLOSURE OF INFORMATION			
	Prinsip 8 Meningkatkan Pelaksanaan Keterbukaan Informasi. Principle 8 Improving the Implementation of Information Disclosure.	24. Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain Situs Web sebagai media keterbukaan informasi. Public Company utilizes the use of information technology more broadly in addition to the Website as a medium for information disclosure.	Keterbukaan informasi hingga saat ini disampaikan melalui situs website perusahaan, media cetak berperedaran nasional dan situs Bursa Efek Indonesia. Meskipun demikian, bank juga memiliki media sosial untuk mensosialisasikan kegiatan perusahaan dan kebijakan pengelolaannya sesuai dengan Surat edaran Direksi Bank Raya. No.50a/DIR.01.03/SKp/Kpp/6/2019 tanggal 28 Juni 2019 tentang pengelolaan Informasi perusahaan, Media Sosial dan Website PT Bank Raya Indonesia Tbk. Up to now, the disclosure of information has been delivered through the company's website, print media with national circulation and the Indonesian stock exchange website. However, the bank also has social media to socialize the company's activities and management policies in accordance with the circular letter of the Board of Directors of Bank Raya. No.50a/DIR.01.03/SKp/Kpp/6/2019 dated June 28, 2019 regarding the management of company information, social media and the website of PT Bank Raya Indonesia Tbk.	Comply
		25. Laporan Tahunan Perusahaan Terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka paling sedikit 5% (lima persen), selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka melalui Pemegang Saham utama dan pengendali. The Public Company Annual Report discloses the ultimate beneficial owner in the share ownership of the Public Company at least 5% (five percent), in addition to the disclosure of the final beneficial owner in the share ownership of the Public Company through the major and controlling shareholders.	Pemilik Manfaat akhir dalam Kepemilikan Saham perusahaan telah disajikan pada Laporan tahunan Perseroan. The ultimate Beneficiary in the Company's Share Ownership has been presented in the Company's annual report.	Comply

Struktur dan Organ Tata Kelola Pemegang Saham

Shareholders' Governance Structure And Organisation

Pemegang Saham sebagai pemilik modal memiliki hak dan tanggung jawab sesuai dengan peraturan perundang-undangan dan Anggaran Dasar Bank Raya.

Pemegang Saham Bank Raya terdiri dari Pemegang Saham Utama/Pengendali, Pemegang Saham yang memiliki saham di atas 5%, dan Pemegang Saham publik yang masing-masing memiliki kurang dari 5% saham Bank.

Bank Raya merupakan Perseroan Terbatas yang mencatat dan memperdagangkan sahamnya di Bursa Efek Indonesia. Sebanyak 3.248.051.111 dari 22.746.526.712 lembar saham tersebut diperdagangkan di Bursa, dan dimiliki oleh masyarakat dengan kepemilikan masing-masing kurang dari 5%.

Shareholders, as capital owners, have rights and duties that are governed by applicable laws and regulations, as well as the Bank Raya's Articles of Association.

Bank Raya's shareholders are divided into three categories: primary/controlling shareholders, shareholders holding more than 5% of the bank's shares, and public shareholders holding less than 5% of the bank's shares.

Bank Raya is a Limited Liability Company that is listed on the Indonesia Stock Exchange and trades its shares. The Exchange trades 3,248,051,111 of the 22,746,526,712 shares, with the public owning less than 5% of each.

Struktur Pemegang Saham BRI Agro

Per 31 Desember 2021



Hak Pemegang Saham

Rights of Shareholders

1. Berdasarkan Anggaran Dasar Perseroan pasal 19 ayat 5 Pemegang Saham dapat melakukan permintaan penyelenggaraan RUPS.
 2. Berdasarkan Anggaran Dasar Perseroan pasal 22 ayat 9 butir h pada saat pelaksanaan RUPS, Pemegang Saham berhak memperoleh informasi mata acara rapat dan bahan terkait mata acara rapat sepanjang tidak bertentangan dengan kepentingan Perseroan.
 3. Menerima dividen saham dengan syarat dan ketentuan sesuai dengan keputusan RUPS.
 4. Ikut berpartisipasi dalam mengambil keputusan di dalam RUPS berdasarkan dengan syarat dan ketentuan yang berlaku dan tata tertib RUPS.
 5. Menerima informasi mengenai tata tertib RUPS dan prosedur voting di dalam RUPS.
1. Pursuant to Article 19 paragraph 5 of the Company's Articles of Association, Shareholders may request the holding of the GMS.
 2. Pursuant to Article 22 paragraph 9, point h of the Company's Articles of Association at the time of the GMS, shareholders have the right to access information about the meeting's agenda and documents relating to the meeting's agenda as long as it does not contradict with the Company's interests.
 3. Receiving stock dividends according to the terms and circumstances established by the GMS.
 4. Assisting in decision-making at the GMS in accordance with relevant terms and conditions and GMS regulations.
 5. Receiving information on the GMS's rules and voting processes.

Rapat Umum Pemegang Saham

General Meeting of Shareholders

Sesuai Undang Undang Nomor 40 tahun 2007 tentang Perseroan Terbatas, Peraturan OJK Nomor 32/POJK.04/2014 tanggal 8 Desember 2014 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka sebagaimana telah diubah dengan Peraturan OJK Nomor 16/POJK.04/2020 tanggal 20 April 2020, dan Anggaran Dasar Bank yang dituangkan dalam Akta pernyataan Keputusan Rapat Nomor 23 tanggal 08 Mei 2019, Perseroan wajib menyelenggarakan RUPS tahunan dalam jangka waktu paling lambat 6 (enam) bulan setelah tahun buku berakhir.

Dalam struktur tata kelola Bank Raya sebagaimana ditetapkan dalam Surat Keputusan Direksi No. Kpts B.32/DIR.01.03/KMrH/IX/2017 tanggal 28 September 2017, perihal: Kebijakan penerapan tata Kelola perusahaan yang baik, Rapat Umum Pemegang Saham (RUPS) adalah organ tata Kelola tertinggi yang mempunyai hak dan kewenangan yang tidak dimiliki Direksi dan Dewan Komisaris dalam batasan yang ditentukan dalam ketentuan peraturan perundangan dan Anggaran Dasar Bank Raya.

In accordance with Law No. 40 of 2007 on Limited Liability Companies, FSA Regulation No. 32/POJK.04/2014 dated December 8, 2014 on the Planning and Organisation of General Meetings of Shareholders of Public Companies, as amended by FSA Regulation No. 16/POJK.04/2020 dated April 20, 2020, and the Bank's Articles of Association as amended by Deed of Meeting Resolution No. 23 dated May 08, 2019, the Company is required to hold an annual GMS.

In the governance structure of Bank Raya as stipulated in the Decree of the Board of Directors No. Kpts B.32/DIR.01.03/KMrH/IX/2017 dated September 28, 2017, regarding the Policy for Implementing Good Corporate Governance, the General Meeting of Shareholders (GMS) is the highest governance organ that has rights and authorities that are not owned by the Board of Directors and the Board of Commissioners within the limits specified in the provisions of laws and regulations and the Articles of Association of Bank Raya.

Wewenang RUPS

GMS Authorities

RUPS mempunyai wewenang yang tidak diberikan kepada Direksi atau Dewan Komisaris, dalam batas yang ditentukan dalam Undang Undang Nomor 40 tahun 2007 tentang Perseroan Terbatas dan/ atau Anggaran Dasar Perseroan.

Wewenang RUPS antara lain adalah :

1. Mengevaluasi kinerja Dewan Komisaris dan Direksi
2. Mengesahkan perubahan Anggaran Dasar
3. Memberikan persetujuan atas Laporan Direksi, Laporan tugas pengawasan Dewan Komisaris serta Laporan Keuangan Perseroan,
4. Menetapkan alokasi penggunaan laba,
5. Menunjuk dan menetapkan biaya jasa akuntan publik,
6. Menetapkan jumlah dan jenis kompensasi serta fasilitas pengurus
7. Menyetujui Laporan tahunan termasuk Laporan Keuangan Perseroan dan Laporan tugas pengawasan Dewan Komisaris Perseroan serta memberikan pelunasan dan pembebasan tanggung jawab (*acquit et decharge*) kepada anggota Direksi dan Dewan Komisaris atas tindakan pengurusan dan pengawasan yang telah dilakukannya masing-masing.
8. Memberi kuasa dan wewenang kepada Direksi untuk menentukan dan membayar dividen final.
9. Mengambil keputusan-keputusan menyangkut struktur organisasi misalnya perubahan Anggaran Dasar, penggabungan, peleburan, pemisahan, pembubaran dan likuidasi Perseroan. Mengangkat dan/atau mengubah susunan anggota Direksi dan Dewan Komisaris.

Within the limitations stipulated in Law Number 40 of 2007 about Limited Liability Companies and/or the Company's Articles of Association, the GMS has powers not granted to the Board of Directors or the Board of Commissioners.

Among the GMS's authorities are the following:

1. Evaluating the Board of Commissioners' and Board of Directors' performance
2. Approving the alteration of Articles of Association
3. Approving the Board of Directors' Report, the Supervisory Task Report of the Board of Commissioners, and the Company's Financial Statements
4. Determining the distribution of earnings
5. Appointing public accountants and establishing their fees
6. Establishing the appropriate level and kind of compensation and management facilities
7. Approving the annual report, which includes the Company's financial statements and a report on the Board of Commissioners' supervisory responsibilities, as well as discharging and releasing members of the Board of Directors and Board of Commissioners from their respective management and supervisory responsibilities (*acquit et decharge*).
8. Delegating authority and responsibility for determining and paying the final dividend to the Board of Directors.
9. Making organisational structure-related choices, such as amending the Articles of Association, merging, consolidating, separating, dissolving, and liquidating the Company. Appoint and/or restructure the Board of Directors and the Board of Commissioners.

10. Memutuskan remunerasi yakni: penetapan gaji, tunjangan lain serta honorarium Direksi dan Dewan Komisaris Perseroan.
11. Memberi persetujuan terhadap transaksi yang mengandung benturan kepentingan.
12. Memberikan kuasa dan kewenangan kepada Dewan Komisaris untuk menunjuk Kantor Akuntan Publik (KAP) dengan memperhatikan rekomendasi dari Komite audit.

10. Setting pay, including the salary, additional benefits, and honorarium for the Company's Board of Directors and Board of Commissioners.
11. Approving the transactions with potential conflicts of interest.
12. Delegating powers to the Board of Commissioners to choose a Public Accounting Firm (KAP) based on the audit committee's recommendations.

Jenis RUPS Type of GMS

Di dalam perubahan Anggaran Dasar Perseroan tanggal 8 Mei 2019 pasal 19 ayat 1, yang disebut RUPS dalam Perseroan adalah:

1. RUPS tahunan, diselenggarakan tiap tahun paling lambat 6 (enam) bulan setelah tahun buku Perseroan ditutup
2. RUPS, lainnya selanjutnya disebut RUPS Luar Biasa yaitu RUPS yang diadakan sewaktu-waktu berdasarkan kebutuhan.

The following are the GMS in the Company, as defined in the revision to the Company's Articles of Association dated May 8, 2019 article 19 paragraph 1:

1. Annual GMS, conducted no later than six (six) months after the Company's fiscal year ends.
2. GMS, subsequently referred to as Extraordinary GMS, which is GMS that is retained on a need-to-know basis.

Tata Cara Penyelenggaraan RUPS Procedures for Organising a GMS

1. Rapat Umum Pemegang Saham akan diselenggarakan dalam Bahasa Indonesia.
2. Sesuai ketentuan pasal 23 ayat 1 butir a Anggaran Dasar Perseroan, maka rapat akan dipimpin oleh seorang anggota Dewan Komisaris yang ditunjuk oleh Dewan Komisaris Perseroan.
3. Ketentuan mengenai Kuorum rapat diatur pada Anggaran Dasar Perseroan pasal 24
4. Semua acara rapat dibahas dan dibicarakan secara berkesinambungan.
5. Setelah selesai membicarakan setiap acara rapat, pemimpin rapat akan memberikan kesempatan kepada para Pemegang Saham atau kuasanya untuk mengajukan pertanyaan, pendapat, usul atau saran sebelum diadakan pemungutan suara mengenai hal yang berhubungan dengan acara rapat yang dibicarakan;
6. Yang berhak mengajukan pertanyaan dan/atau pendapat dalam rapat hanyalah para Pemegang Saham Perseroan atau kuasanya yang sah yang namanya tercatat dalam Daftar Pemegang Saham Perseroan sehari sebelum tanggal pemanggilan RUPS.
7. Pertanyaan
 - Para Pemegang Saham yang ingin mengajukan pertanyaan, dipersilahkan untuk mengangkat tangan dan mengisi formulir pertanyaan yang telah dibagikan. Petugas akan mengumpulkan formulir yang sudah diisi oleh penanya, yang mencantumkan nama, jumlah saham yang dimiliki atau diwakili dan pertanyaan yang diajukan

1. The Annual General Meeting of Shareholders will be conducted in the Indonesian language.
2. In line with Article 23 paragraph 1 point an of the Company's Articles of Association, the meeting will be presided over by a member of the Board of Commissioners nominated by the Board of Commissioners.
3. Quorum requirements for meetings are outlined in Article 24 of the Company's Articles of Association.
4. All meeting agendas are addressed in detail and are updated on a regular basis.
5. Following discussion of each meeting agenda item, the meeting chairman will offer an opportunity for Shareholders or their proxies to submit questions, thoughts, ideas, or recommendations prior to voting on items on the meeting agenda item.
6. Only Shareholders of the Company or their legal proxies whose names are listed in the Company's Register of Shareholders on the day before the date of the invitation to the GMS are permitted to pose questions and/or express views at the meeting.
7. Inquiry
 - Shareholders who want to ask questions are invited to raise their hands and complete the given question form. The officer will collect a form that the questioner has completed, which will contain the questioner's name, the number of shares held or represented, and the questions asked.

- Setelah penanya mengajukan pertanyaan melalui formulir, pemimpin rapat akan menjawab atau menanggapi.
 - Pertanyaan yang akan dijawab adalah pertanyaan yang berkaitan langsung dengan acara rapat.
8. Hak Suara
- Hanya para Pemegang Saham Perseroan yang namanya tercatat dalam Daftar Pemegang Saham Perseroan satu hari sebelum tanggal panggilan atau kuasanya yang berhak untuk mengeluarkan suara.
 - Tiap-tiap saham memberikan hak kepada pemegangnya untuk mengeluarkan 1 (satu) suara.
9. Keputusan rapat dilakukan dengan cara musyawarah untuk mufakat, apabila musyawarah untuk mufakat tidak tercapai, maka dilakukan pemungutan suara.
- After the questioner submits the form, the meeting leader will react or answer the question.
 - To-be-answered questions are those that are directly linked to the meeting's agenda.
8. Right to vote
- Only Shareholders whose names are included in the Company's Register of Shareholders one day before to the date of the summons, or their proxies, are allowed to vote.
 - Each share permits the holder to vote one (1) time.
9. Meeting decisions are decided by debate to seek agreement; if consensus is not obtained through deliberation, a vote is conducted.

RUPS Tahun 2021 2021 GMS

Pada tahun 2021, Bank Raya telah menyelenggarakan RUPS Tahunan dan RUPS Luar Biasa dengan penjabaran di bawah ini.

Bank Raya had the Annual General Meeting of Shareholders and the Extraordinary General Meeting of Shareholders in 2021, as shown below.

RUPS Tahunan

Annual GMS

Penyelenggaraan RUPS Tahunan Bank Raya dilangsungkan pada tanggal 9 April 2021 dengan tata cara pelaksanaan sesuai dengan aturan OJK yaitu:

The Bank Raya's Annual GMS will be conducted on April 9, 2021, in compliance with FSA norms, namely:

Kegiatan Activity	Tanggal Date	Keterangan Description
Pemberitahuan Agenda RUPS kepada OJK Notification of GMS Agenda to FSA	23 Feb 2021	Melalui surat Direksi No.B.75/DIR.03/SKP/02/2021 Through the letter of the Board of Directors No.B.75/DIR.03/SKP/02/2021
Pengumuman RUPS GMS Announcement	Website KSEI KSEI Website	3 Mar 2021
	Website Bank Raya Bank Raya Website	3 Mar 2021
	Website Bursa Efek Indonesia Indonesia Stock Exchange Website	3 Mar 2021
Pemanggilan RUPS GMS Summons	Website KSEI KSEI Website	18 Mar 2021
	Website Bank Raya Bank Raya Website	18 Mar 2021
	Website Bursa Efek Indonesia Indonesia Stock Exchange Website	18 Mar 2021
Pelaksanaan RUPS GMS Implementation	9 Apr 2021	Ruang Serbaguna Gedung Bank Raya Jl. Warung Jati Barat No. 139 Jakarta Selatan Multipurpose Room Bank Raya Building Jl. Warung Jati Barat No. 139 South Jakarta
Pengumuman Hasil dan Keputusan Announcement of Results and Decisions	13 Apr 2021	Tayang di Investor Daily tanggal 13 Apr 2021 Broadcast on Investor Daily on April 13, 2021

RUPS Tahunan dihadiri oleh 19.825.495.055 saham setara dengan 92,89% dan seluruh jumlah saham dengan hak suara yang sah yang telah dikeluarkan oleh Perseroan. Selain itu, RUPS Tahunan juga dihadiri oleh anggota Dewan Komisaris dan Direksi.

The Annual GMS was attended by 19,825,495,055 shares, or 92.89% of the Company's total number of shares with valid voting rights. Additionally, representatives of the Board of Commissioners and the Board of Directors attended the Annual GMS.

Dewan Komisaris
Komisaris Utama : Budi Satria
Komisaris Independen : Anna Maria Tjiadarma
Komisaris Independen : A.Y. Soepadmo

Board of Commissioners
President Commissioner : Budi Satria
Independent Commissioner : Anna Maria Tjiadarma
Independent Commissioner : A.Y. Soepadmo

Direksi
Direktur Risk Management : Herry Prayudi
Direktur Bisnis : Sigit Murtiyoso
Direktur Legal, Compliance & Human Capital : Emawan

Board of Directors
Director of Risk Management : Herry Prayudi
Director of Business : Sigit Murtiyoso
Director of Legal, Compliance, & Human Capital : Emawan

Keputusan RUPS Tahunan 2021

Annual GMS Verdicts for 2021

Mata Acara Rapat Pertama First Meeting Agenda	Persetujuan Laporan Tahunan dan Laporan Keuangan Tahunan Approval of Annual Report and Annual Financial Report		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.825.495.055 (92,89%) Attendance Quorum 19,825,495,055 (92.89%)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	19.760.799.255 (99,67%)	64.695.800 (0,33%)	200 (0%)
Keputusan Rapat Meeting Decision	- Menyetujui Laporan Tahunan Perseroan termasuk Laporan Tugas Pengawasan yang telah dilaksanakan oleh Dewan Komisaris Perseroan untuk Tahun Buku 2020 (dua ribu dua puluh) dan mengesahkan Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31-12-2020 (tiga puluh satu Desember dua ribu dua puluh) yang telah diaudit oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja sesuai laporannya dengan surat nomor 000390/2.1032/AU.1/07/1681-1/1/IV/2021 tanggal 05-04-2021 (lima April dua ribu dua puluh satu) dengan pendapat "wajar dalam semua hal yang material". - Memberikan pelunasan dan pembebasan tanggung jawab (<i>acquit et de charge</i>) kepada seluruh anggota Direksi dan Dewan Komisaris Perseroan atas tindakan pengurusan dan pengawasan yang telah dijalankan selama tahun buku yang berakhir tanggal 31-12-2020 (tiga puluh satu Desember dua ribu dua puluh), sepanjang tindakan-tindakan tersebut bukan merupakan tindak pidana dan tindakan tersebut tercermin dalam laporan tahunan dan laporan keuangan Perseroan. - Approved the Company's Annual Report including the Supervisory Task Report that has been carried out by the Company's Board of Commissioners for the Financial Year 2020 (two thousand and twenty) and ratified the Company's Financial Statements for the financial year ending on 31-12-2020 (the thirty-first of December two thousand and two hundred) which has been audited by the Purwantono, Sungkoro & Surja Public Accounting Firm in accordance with its report by letter number 000390/2.1032/AU.1/07/1681-1/1/IV/2021 dated 05-04-2021 (the fifth of April two thousand two hundred and twenty one) with the opinion "fair in all material respects". - Provide discharge and release of responsibilities (<i>acquit et de charge</i>) to all members of the Board of Directors and Board of Commissioners of the Company for the management and supervisory actions that have been carried out during the financial year ending 31-12-2020 (the thirty-first of December two thousand and twenty), as long as these actions are not criminal acts and such actions are reflected in the annual report and financial statements of the Company.		

Mata Acara Rapat Kedua Second Meeting Agenda	Persetujuan Penggunaan Laba Bersih Approval of Use of Net Profit		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.825.495.055 (92,89%) Attendance Quorum 19,825,495,055 (92.89%)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	19.825.495.055 (100%)	0 (0%)	100 (0%)
Keputusan Rapat	Menyetujui penggunaan Laba Usaha Perseroan Tahun Buku 2020 (dua ribu dua puluh) sebesar Rp31.260.681.809,- (tiga puluh satu miliar dua ratus enam puluh juta enam ratus delapan puluh satu ribu delapan ratus sembilan puluh rupiah), dengan pembagian sebagai berikut : 1. Penyisihan cadangan wajib Perseroan sebesar 5% (lima persen) dari laba usaha tahun buku 2020 (dua ribu dua puluh) atau sebesar Rp1.563.034.090,- (satu miliar lima ratus enam puluh tiga juta tiga puluh empat ribu sembilan puluh rupiah). 2. Menyetujui untuk tidak dilakukan pembagian dividen atas laba usaha Perseroan tahun buku 2020 (dua ribu dua puluh). 3. Sehingga sisanya sebesar 95% (sembilan puluh lima persen) dari laba bersih tahun buku 2020 (dua ribu dua puluh) atau sebesar Rp29.697.647.719,- (dua puluh sembilan miliar enam ratus sembilan puluh tujuh juta enam ratus empat puluh tujuh ribu tujuh ratus sembilan belas rupiah) ditetapkan sebagai Laba Ditahan Perseroan.		
Meeting Decision	Approved the use of the Company's Operating Profit for the Financial Year 2020 (two thousand and twenty) of IDR 31,260,681,809,- (thirty one billion two hundred sixty million six hundred eighty one thousand eight hundred nine rupiah), with the following distribution: 1. Provision for the Company's mandatory reserves of 5% (five percent) of the operating profit for the financial year 2020 (two thousand and twenty) or IDR 1,563,034,090,- (one billion five hundred sixty-three million thirty-four thousand and ninety rupiah). 2. Approved not to distribute dividends on the Company's operating profit for the fiscal year 2020 (two thousand and twenty). 3. So that the remaining 95% (ninety five percent) of the net profit for the fiscal year 2020 (two thousand and twenty) or IDR 29,697,647,719,- (twenty-nine billion six hundred ninety-seven million six hundred forty-seven thousand seven hundred and nineteen rupiah) is designated as the Company's Retained Earnings.		
Mata Acara Rapat Ketiga Third Meeting Agenda	Persetujuan pemberian tantiem Tahun Buku 2020 dan benefit lainnya tahun 2021 kepada Anggota Direksi dan Dewan Komisaris Perseroan Approval for granting tantiem for Financial Year 2020 and other benefits for 2021 to members of the Board of Directors and Board of Commissioners of the Company		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.825.495.055 (92,89%) Attendance Quorum 19,825,495,055 (92.89%)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	19.825.486.455 (99,99%)	59.225.700 (0,3%)	200 (0%)
Keputusan Rapat	Menyetujui pemberian wewenang dan kuasa kepada Dewan Komisaris Perseroan dengan terlebih dahulu mendapatkan persetujuan PT Bank Rakyat Indonesia (Persero) Tbk. sebagai Pemegang Saham pengendali Perseroan untuk menetapkan besarnya remunerasi (gaji, honorarium, fasilitas, tunjangan, dan/atau benefit lainnya) tahun 2021 (dua ribu dua puluh satu) bagi Direksi dan Dewan Komisaris, serta tantiem untuk tahun buku 2020 bagi Direksi dan Dewan Komisaris.		
Meeting Decision	Approved the granting of authority and power to the Board of Commissioners of the Company by first obtaining the approval of PT Bank Rakyat Indonesia (Persero) Tbk. as the controlling shareholder of the Company to determine the amount of remuneration (salary, honorarium, facilities, allowances, and/or other benefits) in 2021 (two thousand twenty one) for the Board of Directors and the Board of Commissioners, as well as bonuses for the financial year 2020 for the Board of Directors and the Board of Commissioners.		

Mata Acara Rapat Keempat Fourth Meeting Agenda	Penunjukan Akuntan Publik untuk mengaudit Laporan Keuangan Tahun Buku 2021 Appointment of Public Accountant to audit Financial Statements for Financial Year 2021		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.825.495.055 (92,89%) Attendance Quorum 19,825,495,055 (92.89 %)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	19.766.269.355 (99,7%)	59.225.700 (0,3%)	200 (0%)
Keputusan Rapat	1. Memberikan wewenang dan kuasa kepada Dewan Komisaris Perseroan untuk menunjuk Akuntan Publik dan/atau Kantor Akuntan Publik yang akan melakukan audit atas Laporan Keuangan Perseroan pada Tahun Buku 2021 (dua ribu dua puluh satu) dan memberikan kuasa dan kewenangan kepada Dewan Komisaris Perseroan untuk menetapkan biaya jasa dan persyaratan persyaratan lain yang diperlukan sehubungan dengan penunjukan Kantor Akuntan Publik tersebut. 2. Memberikan wewenang kepada Dewan Komisaris Perseroan untuk menunjuk Akuntan Publik dan/atau Kantor Akuntan Publik pengganti yang kompeten dan terdaftar pada Otoritas Jasa Keuangan (OJK) untuk melaksanakan audit atas buku buku Perseroan tahun buku 2021 (dua ribu dua satu) dan memberikan kuasa dan kewenangan kepada Dewan Komisaris Perseroan untuk menetapkan biaya jasa dan persyaratan persyaratan lain yang diperlukan sehubungan dengan penunjukan Kantor Akuntan Publik pengganti tersebut.		
Meeting Decision	1. Granted authority and power to the Company's Board of Commissioners to appoint a Public Accountant and/or Public Accounting Firm that will audit the Company's Financial Statements for the Financial Year 2021 (two thousand and twenty-one) and granting power and authority to the Company's Board of Commissioners to determine service fees and other necessary requirements in connection with the appointment of the said Public Accounting Firm. 2. Granted authority to the Board of Commissioners of the Company to appoint a competent Public Accountant and/or Public Accounting Firm registered with the Financial Services Authority (OJK) to undertake audits of the Company's books for the 2021 (two thousand and two one) financial year and to grant power and authority to the Company The Board of Commissioners of the Company to determine service fees and other necessary requirements in connection with the appointment of the replacement Public Accounting Firm.		

Mata Acara Rapat Kelima Fifth Meeting Agenda	Perubahan Anggaran Dasar Perseroan Amendment to the Company's Articles of Association		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.825.495.055 (92,89%) Attendance Quorum 19,825,495,055 (92.89 %)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	19.760.799.255 (99,67%)	64.695.800 (0,33%)	1.200 (0%)
Keputusan Rapat	1. Menyetujui perubahan Anggaran Dasar Perseroan dalam rangka penyesuaian dengan POJK nomor :15/POJK.04/2020 tentang Rencana dan penyelenggaraan RUPS Perusahaan terbuka dan POJK nomor : 16/POJK.04/2020 tentang Pelaksanaan RUPS Perusahaan Terbuka secara Elektronik. 2. Menyetujui untuk menyusun kembali seluruh dalam Anggaran Dasar Perseroan, sehubungan dengan perubahan sebagaimana dimaksud pada butir 1 (satu) tersebut diatas yang perubahannya sebagaimana diuraikan dalam lampiran yang tidak terpisahkan dari Berita Acara Rapat. 3. Menyetujui untuk memberikan kuasa dan wewenang kepada Direksi dengan hak substitusi untuk melakukan segala tindakan yang diperlukan berkaitan dengan keputusan Mata Acara Rapat. Kuasa dan wewenang tersebut termasuk menyusun dan menyatakan kembali seluruh Anggaran Dasar Perseroan dalam suatu akta Notaris dan menyampaikan kepada instansi yang Berwenang untuk mendapat tanda penerimaan pemberitahuan perubahan Anggaran Dasar Perseroan, melakukan segala sesuatu yang dipandang perlu dan berguna untuk keperluan tersebut dengan tidak ada satupun yang dikecualikan, serta mengadakan penambahan dan/atau perubahan dalam penambahan Anggaran Dasar Perseroan jika hal tersebut dipersyaratkan oleh instansi yang berwenang.		

Meeting Decision	1. Approved the changes to the Company's Articles of Association in order to comply with POJK number:15/POJK.04/2020 concerning the Plan and implementation of the Public Company GMS and POJK number: 16/POJK.04/2020 concerning the Electronic Implementation of the Public Company GMS. 2. Approved to rearrange everything in the Articles of Association of the Company, in connection with the changes as referred to in point 1(one) above, the changes are as described in the attachment which is an integral part of the Minutes of Meeting. 3. Approved to grant power and authority to the Board of Directors with substitution rights to take all necessary actions related to the decisions of the Meeting Agenda. The power and authority includes compiling and restating the entire Articles of Association of the Company in a notarial deed and submitting it to the competent authority to receive a receipt for notification of changes to the Company's Articles of Association, doing everything that is deemed necessary and useful for that purpose with None being excluded, and make additions and/or amendments to the additions to the Company's Articles of Association if this is required by the competent authority.		
Mata Acara Rapat Keenam Sixth Meeting Agenda	Perubahan Susunan Pengurus Perseroan dan Perubahan Nomenklatur Direksi Perseroan Changes in the Composition of the Company's Management and Changes in the Nomenclature of the Company's Directors		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.825.495.055 (92,89%) Attendance Quorum 19,825,495,055 (92.89%)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	19.760.799.255 (99,67%)	64.695.800 (0,33%)	1.200 (0%)
Keputusan Rapat	1. Memberhentikan dengan hormat ibu ANNA MARIA TJIADARMA, sebagai Komisaris Independen Perseroan. Pemberhentian tersebut terhitung sejak ditutupnya Rapat disertai dengan ucapan terima kasih atas sumbangan tenaga, pikiran dan kontribusi yang diberikan selama menjabat sebagai anggota Dewan Komisaris Perseroan. 2. Memberhentikan dengan hormat Bapak A.Y. SOEPADMO, sebagai Komisaris Independen Perseroan. Pemberhentian tersebut terhitung sejak ditutupnya Rapat disertai dengan ucapan terima kasih atas sumbangan tenaga, pikiran dan kontribusi yang diberikan selama menjabat sebagai anggota Dewan Komisaris Perseroan. 3. Memberhentikan dengan hormat Bapak I.B.K. SUAMBA MANUABA, sebagai Komisaris Perseroan. Pemberhentian tersebut terhitung sejak ditutupnya Rapat disertai dengan ucapan terima kasih atas sumbangan tenaga, pikiran dan kontribusi yang diberikan selama menjabat sebagai anggota Dewan Komisaris Perseroan. 4. Memberhentikan dengan hormat Bapak EBENESER GIRSANG, sebagai DIREKTUR UTAMA Perseroan. Pemberhentian tersebut terhitung sejak ditutupnya Rapat disertai dengan ucapan terima kasih atas sumbangan tenaga, pikiran dan kontribusi yang diberikan selama menjabat sebagai anggota Direksi Perseroan. 5. Memberhentikan dengan hormat Bapak HERRY PRAYUDI, sebagai Direktur Risk Management Perseroan. Pemberhentian tersebut terhitung sejak ditutupnya Rapat disertai dengan ucapan -terima kasih atas sumbangan tenaga, pikiran dan kontribusi yang diberikan selama menjabat -sebagai anggota Direksi Perseroan. 6. Mengangkat Bapak EKO B. SUPRIYANTO, sebagai Komisaris Independen Perseroan. Anggota Dewan Komisaris tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang undangan yang berlaku. Berakhirnya masa jabatan anggota Dewan Komisaris tersebut adalah sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang - undangan yang berlaku dan tanpa mengurangi hak RUPS untuk memberhentikan sewaktu - waktu. 7. Mengangkat Ibu RINA SAADAH, sebagai Komisaris Independen Perseroan. Anggota Dewan Komisaris tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang undangan yang berlaku. Berakhirnya masa jabatan anggota Dewan Komisaris tersebut adalah sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi - hak RUPS untuk memberhentikan sewaktu-waktu.		

8. Mengangkat Bapak RAMA NOTOWIDIGDO, sebagai Komisaris Independen Perseroan. Anggota Dewan Komisaris tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang-undangan yang berlaku. Berakhirnya masa jabatan anggota Dewan Komisaris tersebut adalah sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi hak RUPS untuk memberhentikan sewaktu - waktu.
9. Mengangkat Bapak ACHMAD F.C. BARIR, sebagai Komisaris Perseroan. Anggota Dewan Komisaris tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang-undangan yang berlaku. Berakhirnya masa jabatan anggota Dewan Komisaris tersebut adalah sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi hak RUPS untuk memberhentikan sewaktu - waktu.
10. Mengangkat Bapak KASPAR SITUMORANG, sebagai Direktur Utama Perseroan. Direktur Utama tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang-undangan yang berlaku. Berakhirnya masa jabatan Direktur Utama tersebut adalah sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi hak RUPS untuk memberhentikan sewaktu - waktu.
11. Merubah Nomenklatur Direksi Perseroan sebagai berikut :

Semula	Menjadi
Direktur Operasional dan Keuangan	Direktur Keuangan dan Operasional
Direktur Risk Management	Direktur Enterprise Risk Management Compliance & Human Resource
Direktur Legal, Compliance & Human Capital	Direktur Retail Agri dan Pendanaan
Direktur Bisnis	Direktur Digital Bisnis

12. Mengalihkan penugasan nama nama tersebut dibawah ini sebagai Direksi Perseroan sebagai berikut :
 - Bapak ARIF WICAKSONO, semula Direktur Operasional dan Keuangan, menjadi Direktur Keuangan dan Operasional.
 - Bapak ERNAWAN, semula Direktur Legal, Compliance & Human Capital, menjadi Direktur Enterprise Risk Management, Compliance & Human Resource.
 - Bapak SIGIT MURTIYOSO, semula Direktur Bisnis, menjadi Direktur Retail Agri dan Pendanaan.
 Dengan masa jabatan meneruskan sisa masa jabatan masing masing sesuai dengan keputusan RUPS pengangkatan yang bersangkutan.
13. Mengangkat Bapak BHIMO WIKAN HANTORO, sebagai Direktur Digital Bisnis Perseroan. Direktur tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang-undangan yang berlaku. Berakhirnya masa jabatan Direktur tersebut adalah sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi hak RUPS untuk memberhentikan sewaktu-waktu.
14. Dengan adanya perubahan tersebut, maka susunan anggota Dewan Komisaris dan anggota Direksi Perseroan, menjadi sebagai berikut:

Meeting Decision

DEWAN KOMISARIS

Komisaris Utama	:	BUDI SATRIA
Komisaris Independen	:	EKO B. SUPRIYANTO.
Komisaris Independen	:	RINA SAADAH.
Komisaris Independen	:	RAMA NOTOWIDIGDO.
Komisaris	:	ACHMAD F.C BARIR.

DIREKSI

Direktur Utama	:	KASPAR SITUMORANG
Direktur Keuangan dan Operasional	:	ARIF WICAKSONO.
Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i>	:	ERNAWAN
Direktur Retail Agri dan Pendanaan	:	SIGIT MURTIYOSO.
Direktur Digital Bisnis	:	BHIMO WIKAN HANTORO.

15. Memberikan kuasa dan wewenang kepada Direksi Perseroan dengan hak substitusi untuk melakukan segala tindakan yang diperlukan berkaitan dengan keputusan agenda ini sesuai dengan ketentuan yang berlaku, termasuk untuk menyatakan dalam akta Notaris tersendiri dan memberitahukan susunan Dewan Komisaris dan Direksi kepada Kementerian Hukum dan HAM RI.
1. Dismissing with honor Ms. ANNA MARIA TJIADARMA, as the Company's Independent Commissioner. The dismissal is effective as of the closing of the Meeting accompanied by an acknowledgment of gratitude for the contribution of energy, thoughts and contributions given while serving as a member of the Company's Board of Commissioners.
2. Honorably dismissed Mr. AY SOEPADMO, as the Company's Independent Commissioner. The dismissal is effective as of the closing of the Meeting accompanied by an acknowledgment of gratitude for the contribution of energy, thoughts and contributions given while serving as a member of the Company's Board of Commissioners.
3. Honorably dismissed Mr. IBK SUAMBA MANUABA, as Commissioner of the Company. The dismissal is effective as of the closing of the Meeting accompanied by an acknowledgment of gratitude for the contribution of energy, thoughts and contributions given while serving as a member of the Company's Board of Commissioners.
4. To honorably dismiss Mr. EBENESER GIRSANG, as PRESIDENT DIRECTOR of the Company. The dismissal is effective as of the closing of the Meeting accompanied by an acknowledgment of gratitude for the contribution of energy, thoughts and contributions given while serving as a member of the Company's Board of Directors.
5. Honorably dismissed Mr. HERRY PRAYUDI, as the Company's Risk Management Director. The dismissal is effective as of the closing of the Meeting accompanied by thanks for the contribution of energy, thoughts and contributions during his tenure as a member of the Company's Board of Directors.
6. Appointed Mr. EKO B. SUPRIYANTO, as the Company's Independent Commissioner. The member of the Board of Commissioners can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the provisions of the applicable laws and regulations. The term of office of the member of the Board of Commissioners expires until the closing of the 3rd (third) Annual GMS since the appointment concerned, with due observance of the prevailing laws and regulations and without prejudice to the right of the GMS to dismiss at any time.
7. Appointed Ms. RINA SAADAH, as the Company's Independent Commissioner. The member of the Board of Commissioners can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the provisions of the applicable laws and regulations. The term of office of the member of the Board of Commissioners expires until the closing of the third (third) Annual GMS since the appointment of the person concerned, with due observance of the prevailing laws and regulations and without prejudice to the right of the GMS to dismiss him at any time.

8. Appointed Mr. RAMA NOTOWIDIGDO, as the Company's Independent Commissioner. The member of the Board of Commissioners can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the provisions of the applicable laws and regulations. The term of office of the member of the Board of Commissioners expires until the closing of the 3rd (third) Annual GMS since the appointment in question, with due observance of the prevailing laws and regulations and without prejudice to the right of the GMS to dismiss at any time.
9. Appointed Mr. ACHMAD FC BARIR, as Commissioner of the Company. The member of the Board of Commissioners can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the provisions of the applicable laws and regulations. The term of office of the member of the Board of Commissioners expires until the closing of the 3rd (third) Annual GMS since the appointment in question, with due observance of the prevailing laws and regulations and without prejudice to the right of the GMS to dismiss at any time.
10. Appointed Mr. KASPAR SITUMORANG, as the President Director of the Company. The President Director can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the applicable laws and regulations. The end of the term of office of the President Director is until the closing of the 3rd (third) Annual GMS since the appointment of the person concerned, taking into account the prevailing laws and regulations and without prejudice to the right of the GMS to dismiss at any time.
11. Amend the Nomenclature of the Company's Board of Directors as follows:

Beginning	Become
Director of Operations and Finance	Director of Finance and Operations
Director of Risk Management	Director of Enterprise Risk Management Compliance & Human Resources
Director of Legal, Compliance & Human Capital	Director of Retail Agri and Funding
Business Director	Director of Digital Business

12. Transferring the assignment of the names below to the Board of Directors of the Company as follows:
 - Mr. ARIF WICAKSONO, originally the Director of Operations and Finance, became the Director of Finance and Operations.
 - Mr. ERNAWAN, originally Director of Legal, Compliance & Human Capital, became Director of Enterprise Risk Management, Compliance & Human Resource.
 - Mr. SIGIT MURTIYOSO, originally Director of Business, became Director of Retail Agri and Funding.
with a term of office continuing the rest of their respective terms of office in accordance with the decision of the GMS for the appointment in question.
13. Appointed Mr. BHIMO WAKAN HANTORO, as Director of the Company's Digital Business. The Director can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the provisions of the applicable laws and regulations. The term of office of the Director ends until the closing of the 3rd (third) Annual GMS since the appointment of the person concerned, taking into account the prevailing laws and regulations and without prejudice to the right of the GMS to dismiss him at any time.
14. With this change, the composition of the members of the Board of Commissioners and members of the Board of Directors of the Company is as follows:

BOARD OF DIRECTORS

Direktur Utama	:	KASPAR SITUMORANG
Direktur Keuangan dan Operasional	:	ARIF WICAKSONO.
Direktur Enterprise Risk Management, Compliance & Human Resource	:	ERNAWAN
Direktur Retail Agri dan Pendanaan	:	SIGIT MURTIYOSO.
Direktur Digital Bisnis	:	BHIMO WIKAN HANTORO.

15. Granting power and authority to the Company's Board of Directors with substitution rights to take all necessary actions related to this agenda decision in accordance with applicable regulations, including to declare in a separate Notary deed and notify the composition of the Board of Commissioners and Board of Directors to the Ministry of Law and Human Rights of the Republic of Indonesia.

RUPS Luar Biasa

Extraordinary GMS

Kegiatan Activity		Tanggal Date	Keterangan Description
Pemberitahuan Agenda RUPS kepada OJK Notification of GMS Agenda to OJK		10 Agustus 2021 August 10, 2021	Melalui surat No. B.426/DIR.01.02/SKP/08 2021 By letter No. B.426/DIR.01.02/SKP/08 2021
Pengumuman RUPS GMS Announcement	Website KSEI KSEI Website	19 Agustus 2021 August 19, 2021	Tayang di Investor Daily tanggal 19 Agustus 2021 Shown on Investor Daily on August 19, 2021
	Website Bank Raya Bank Raya Website	19 Agustus 2021 August 19, 2021	
	Website Bursa Efek Indonesia Indonesia Stock Exchange Website	19 Agustus 2021 August 19, 2021	
Pemanggilan RUPS GMS Summons	Website KSEI KSEI Website	3 September 2021 September 3, 2021	Tayang di Investor Daily tanggal 3 September 2021 Shown on Investor Daily on September 3, 2021
	Website Bank Raya Bank Raya Website	3 September 2021 September 3, 2021	
	Website Bursa Efek Indonesia Indonesia Stock Exchange Website	3 September 2021 September 3, 2021	
Pelaksanaan RUPS GMS Implementation		27 September 2021 September 27, 2021	Ruang Serbaguna Gedung Bank Raya Jl. Warung Jati Barat No. 139 Jakarta Selatan Multipurpose Room Bank Raya Building Jl. Warung Jati Barat No. 139 South Jakarta
Pengumuman Hasil dan Keputusan Announcement of Results and Decisions		29 September 2021 September 29, 2021	Tayang di Investor Daily tanggal 29 September 2021 Shown on Investor Daily on September 29, 2021

Rapat dihadiri oleh para Pemegang Saham dan/atau kuasanya yang hadir secara langsung (*offline*) dan secara elektronik (*online*), serta para Pemegang Saham yang memberikan kuasa secara e-Proxy eASY.KSEI sebanyak 19.194.285.441 saham atau mewakili 88,49% dari 21.689.185.087 saham, yang merupakan jumlah seluruh saham yang telah ditempatkan dan disetor penuh dalam Perseroan.

Shareholders and/or their proxies were present in person (*offline*) and electronically (*online*), as well as Shareholders who granted their power of attorney through e-Proxy eASY.KSEI for up to 19,194,285,441 shares, or 88.49% of the Company's total issued and fully paid shares of 21,689,185,087 shares.

Rapat juga dihadiri oleh seluruh anggota Dewan Komisaris dan Direksi, yaitu:

Additionally, all Board of Commissioners and Board of Directors members were present, including the following:

Dewan Komisaris		Board of Commissioners	
Komisaris Utama	: Budi Satria	President Commissioner	: Budi Satria
Komisaris	: Achmad F.C Barir	Commissioner	: Achmad F. C. Barir
Komisaris Independen	: Eko Budi Supriyanto	Independent Commissioner	: Eko Budi Supriyanto
Komisaris Independen	: Rina Sa'adah	Independent Commissioner	: Rina Sa'adah
Komisaris Independen	: Rama Gutama Notowidigdo	Independent Commissioner	: Rama Gutama Notowidigdo
Direksi		Board of Directors	
Direktur Utama	: Kaspar Situmorang	President Director	: Kaspar Situmorang
Direktur Keuangan dan Operasional	: Arif Wicaksono	Director of Finance & Operations	: Arif Wicaksono
Direktur Enterprise	: Ernawan	Director of Enterprise	: Emawan
Risk Management, Compliance & Human Resources		Risk Management, Compliance & Human Resources	
Direktur Ritel Agri & Pendanaan	: Sigit Murtiyoso	Director of Agri Retail & Funding	: Sigit Murtiyoso
Direktur Digital Bisnis	: Bhimo Wikan Hantoro	Director of Digital Business	: Bhimo Wikan Hantoro

Keputusan RUPS Luar Biasa

Seluruh keputusan telah disahkan dalam Akta Notaris No. 23 Notaris M. Nova Faisal, SH., M.Kn dengan rincian sebagai berikut:

Extraordinary GMS Verdicts

The Notarial Deed ratifies all judgments. 23 Notary M. Nova Faisal, SH., M.Kn with the following details:

Mata Acara Rapat Kesatu First Meeting Agenda	Persetujuan Perubahan Anggaran Dasar Perseroan Approval of the Amendment to the Company's Articles of Association		
Jumlah Pemegang Saham yang Bertanya Number of Inquiring Shareholders	Nihil None		
Pengambilan Keputusan Dengan Pemungutan Suara Decision Making By Voting	Kuorum Kehadiran 19.194.285.441 (88,49%) Attendance Quorum 19,194,285,441 (88.49%)		
	Setuju Agree	Tidak Setuju Do not agree	Abstain Abstain
	18.838.293.963 (98,15%)	355.764.300 (1,85%)	227.178 (0%)
Keputusan Rapat Meeting Decision	a. Menyetujui perubahan nama Perseroan, semula bernama: "PT Bank Rakyat Indonesia Agroniaga Tbk" dengan nama komersial BRI AGRO, menjadi bernama: "PT Bank Raya Indonesia Tbk" dengan nama komersial BANK RAYA, atau nama lain yang dapat diterima dalam Sisminbakum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia. b. Menyetujui perubahan pasal 1 ayat (1) Anggaran Dasar Perseroan, sehubungan dengan adanya perubahan nama Perseroan sebagaimana tersebut dalam huruf a di atas. c. Memberikan kuasa kepada Direksi Perseroan dengan hak substitusi untuk melakukan segala tindakan yang diperlukan sehubungan dengan perubahan nama Perseroan, dengan memperhatikan seluruh peraturan-perundangan yang berlaku, termasuk untuk menyatakan keputusan dengan akta tersendiri di hadapan seorang Notaris. a. Approved the change in the name of the Company, originally named: "PT Bank Rakyat Indonesia Agroniaga Tbk" with the commercial name BRI AGRO, to become: "PT Bank Raya Indonesia Tbk" with the commercial name BANK RAYA, or any other acceptable name in the Sisminbakum Ministry of Law and Rights Human Rights of the Republic of Indonesia. b. Approved changes to article 1 paragraph (1) of the Company's Articles of Association, in connection with the change in the name of the Company as referred to in letter a above. c. Granted power of attorney to the Board of Directors of the Company with substitution rights to take all necessary actions in connection with the change of the Company's name, taking into account all applicable laws and regulations, including to declare decisions by separate deed before a Notary.		

Keputusan RUPS Tahun 2020

RUPS Tahun 2020 diselenggarakan pada 19 Februari 2020 dengan menghasilkan 14 (empat belas) Keputusan yang keseluruhannya telah disahkan dalam Akta RUPS Tahunan No 24 Tanggal 19 Februari 2020 Notaris M. Nova Faisal SH., M.Kn. Keputusan RUPS Tahunan 2020 juga telah terealisasi pada dengan penjabaran sebagai berikut:

Annual GMS Verdicts for 2021

The 2020 GMS convened on February 19, 2020, and issued 14 (fourteen) judgments, all of which were authorised in the Annual GMS No. 24 Deed dated February 19, 2020, Notary M. Nova Faisal SH., M.Kn. The following rationale also explains the decision to hold the 2020 Annual GMS:

No.	Agenda Agenda	Keputusan Decision
1	Persetujuan Laporan tahunan termasuk pengesahan Laporan Keuangan dan Laporan pengawasan Dewan Komisaris tahun Buku 2019 sekaligus pemberian pelunasan dan pembebasan tanggung jawab sepenuhnya (<i>acquit et de charge</i>) kepada Direksi dan Dewan Komisaris Perseroan atas tindakan pengurusan dan pengawasan yang telah dijalankan selama tahun Buku 2019. Approval of the annual report including the ratification of the Financial Statements and the Supervisory Report of the Board of Commissioners for the 2019 Fiscal year as well as the granting of full discharge and acquittal (<i>acquit et de charge</i>) to the Company's Board of Directors and Board of Commissioners for the management and supervisory actions that have been carried out during the 2019 Fiscal year.	1. Menyetujui dan menerima dengan baik Laporan tahunan Perseroan termasuk Laporan tugas pengawasan Dewan Komisaris Perseroan tahun Buku 2019 (dua ribu sembilan belas); dan 2. Mengesahkan Laporan Keuangan Perseroan yang terdiri dari neraca dan Laporan Laba/rugi Perseroan untuk tahun Buku 2019 (dua ribu sembilan belas) yang telah diaudit oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja dengan pendapat "wajar dalam semua hal yang material" sebagaimana tertuang dalam laporannya tertanggal 28-01-2020 (dua puluh delapan Januari dua ribu dua puluh) Nomor 00029/2.1032/AU.1/07/0240-1/1/2020 3. Memberikan pelunasan dan pembebasan tanggung jawab (<i>acquit et de charge</i>) kepada seluruh anggota Direksi dan Dewan Komisaris periode tahun 2019 (dua ribu sembilan belas) atas tindakan pengurusan dan pengawasan mereka yang telah dijalankan selama tahun buku 2019 (dua ribu sembilan belas), sejauh tindakan tersebut tercermin dalam Laporan auditor Independen tersebut di atas, kecuali perbuatan tindak pidana 1. Approve and accept the Company's annual report including the report on the supervisory duties of the Company's Board of Commissioners for the 2019 (two thousand and nineteen) fiscal year; and 2. To ratify the Company's Financial Statements consisting of the balance sheet and the Company's Profit/Loss Statement for the 2019 (two thousand and nineteen) Fiscal year which has been audited by the Purwantono, Sungkoro & Surja Public Accounting Firm with the opinion "fair in all material respects" as stated in the report dated 28-01-2020 (the twenty eighth of January two thousand and twenty) Number 00029/2.1032/AU.1/07/0240-1/1/2020 3. Provide discharge and release of responsibilities (<i>acquit et de charge</i>) to all members of the Board of Directors and Board of Commissioners for the period of 2019 (two thousand and nineteen) for their management and supervisory actions that have been carried out during the 2019 (two thousand and nineteen) financial year, to the extent that such actions This is reflected in the Independent auditor's report above, except for criminal acts
2	Penetapan penggunaan Laba Usaha Perseroan tahun Buku 2019.	Menyetujui penggunaan Laba Bersih Perseroan tahun Buku 2019 (dua ribu sembilan belas) sebesar Rp51.061.419.892 (lima puluh satu miliar enam puluh satu juta empat ratus sembilan belas ribu delapan ratus sembilan puluh dua rupiah), untuk digunakan sebagai berikut: • penyisihan cadangan Perseroan sesuai pasal 70 Undang-Undang Nomor 40 tahun 2007 (dua ribu tujuh) tentang Perseroan terbatas sebesar 5% (lima persen) dari Laba Bersih tahun Buku 2019 atau sebesar Rp2.553.070.995,- (dua miliar lima ratus lima puluh tiga juta tujuh puluh ribu sembilan ratus sembilan puluh lima rupiah). • Sebesar 95% (sembilan puluh lima persen) dari Laba Bersih tahun Buku 2019 atau sebesar Rp48.508.348.897,- (empat puluh delapan miliar lima ratus delapan juta tiga ratus empat puluh delapan ribu delapan ratus sembilan puluh tujuh rupiah) ditetapkan sebagai Laba Ditahan Perseroan.

No.	Agenda Agenda	Keputusan Decision
	Determination of the use of the Company's operating profit for the 2019 financial year.	Approved the use of the Company's Net Profit for the 2019 (two thousand and nineteen) Fiscal year of IDR 51,061,419,892 (fifty-one billion sixty- one million four hundred nineteen thousand eight hundred and ninety-two rupiah), to be used as follows: - allowance for the Company's reserves in accordance with Article 70 of Law Number 40 of 2007 (two thousand and seven) concerning Limited Liability Companies in the amount of 5% (five percent) of Net Profit for the 2019 Fiscal year or in the amount of IDR 2,553,070,995 (two billion five hundred fifty three million seventy thousand nine hundred and ninety five rupiah). 95% (ninety five percent) of the net profit for the 2019 financial year or IDR48,508,348,897,- (forty eight billion five hundred eight million three hundred forty eight thousand eight hundred ninety seven rupiah) is designated as Retained Earnings Company.
3	Persetujuan pemberian tantiem tahun Buku 2019 dan <i>benefit</i> lainnya tahun 2020 kepada anggota Direksi dan Dewan Komisaris Perseroan Approval of granting tantiem for Fiscal year 2019 and other benefits for 2020 to members of the Board of Directors and Board of Commissioners of the Company	Memberikan wewenang dan kuasa kepada Dewan Komisaris dengan terlebih dahulu mendapatkan persetujuan Pemegang Saham pengendali (Bank BRI) untuk menetapkan besarnya tantiem untuk tahun buku 2019 serta menetapkan benefit lainnya bagi anggota Direksi dan Dewan Komisaris Perseroan untuk tahun buku 2020. Granting authority and power to the Board of Commissioners with prior approval from the controlling shareholder (Bank BRI) to determine the amount of bonus for the 2019 financial year and to determine other benefits for members of the Board of Directors and Board of Commissioners of the Company for the 2020 financial year.
4	Persetujuan penunjukkan akuntan publik untuk mengaudit Laporan Keuangan tahun Buku 2020. Approval for the appointment of a public accountant to audit the Financial Statements for Fiscal year 2020.	- Memberi wewenang kepada Dewan Komisaris Perseroan untuk: - Menunjuk Kantor akuntan publik untuk mengaudit Laporan Keuangan Perseroan untuk tahun Buku yang berakhir pada tanggal 31-12-2020 (tiga puluh satu Desember dua ribu dua puluh). - Menunjuk Kantor akuntan publik pengganti yang telah memperoleh pengakuan dan terdaftar di otoritas Jasa Keuangan atau Bank Indonesia untuk melaksanakan audit atas Laporan Keuangan tahun buku 2020 (dua ribu dua puluh) dalam hal terjadi pergantian Kantor akuntan publik. - Memberi wewenang dan kuasa kepada Direksi Perseroan untuk menetapkan biaya jasa dan persyaratan lain yang diperlukan sehubungan dengan penunjukkan Kantor akuntan publik tersebut sebagaimana telah dikemukakan di atas sesuai dengan tujuan Perseroan. To authorise the Company's Board of Commissioners to: - Appoint a public accounting firm to audit the Company's Financial Statements for the financial year ending on 31-12-2020 (the thirty-first of December two thousand and twenty). - Appoint a replacement public accounting firm that has obtained recognition and is registered with the Financial Services Authority or Bank Indonesia to audit the Financial Statements for the 2020 (two thousand and twenty) financial year in the event of a change of public accounting firm. Granting authority and power to the Board of Directors of the Company to determine service fees and other necessary requirements in connection with the appointment of the said public accounting firm as stated above in accordance with the objectives of the Company.

No.	Agenda Agenda	Keputusan Decision																		
5	Perubahan Susunan pengurus Perseroan	1. Mengubah nomenklatur jabatan Direksi Perseroan sebagai berikut: 2. Mengukuhkan pemberhentian Bapak Ahdi Jumhari Luddin sebagai Komisaris Utama Perseroan. pemberhentian Komisaris Utama tersebut terhitung sejak berakhirnya masa jabatan Komisaris Utama tertanggal 28-11-2019 (dua puluh delapan November dua ribu sembilan belas) disertai dengan ucapan terima kasih atas sumbangan tenaga, pikiran, dan kontribusi yang diberikan selama menjabat sebagai Komisaris Utama. 3. Mengangkat Bapak Budi Satria sebagai Komisaris Utama Perseroan. Komisaris Utama yang diangkat tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari otoritas Jasa Keuangan dan memenuhi ketentuan perundang-undangan yang berlaku. Berakhirnya masa jabatan Komisaris Utama yang diangkat tersebut adalah sampai dengan ditutupnya Rapat Umum Pemegang Saham Tahunan yang ke 3 (tiga) sejak pengangkatan yang bersangkutan dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi hak Rapat Umum Pemegang Saham untuk memberhentikan sewaktu waktu. 4. Mengalihkan penugasan nama nama tersebut di bawah ini sebagai anggota Direksi Perseroan - Bapak Ebeneser Girsang semula sebagai Direktur Pengendalian Risiko Kredit Dan Pendanaan Perseroan menjadi Direktur Utama Perseroan - Bapak Herry Prayudi semula Direktur Kepatuhan Perseroan menjadi Direktur <i>Risk Management</i> Perseroan - Bapak Ernawan semula Direktur Operasional dan Keuangan Perseroan menjadi Direktur <i>Legal, Compliance & Human Capital</i>. Dengan masa jabatan meneruskan sisa masa jabatan masing masing sesuai dengan keputusan Rapat Umum Pemegang Saham pengangkatan yang bersangkutan. 5. Mengangkat Bapak Arif Wicaksono sebagai Direktur Operasional dan Keuangan. Direktur yang diangkat tersebut baru dapat melaksanakan tugas dan fungsi dalam jabatannya apabila telah mendapatkan persetujuan dari Otoritas Jasa Keuangan dan memenuhi ketentuan perundang-undangan yang berlaku. Berakhirnya masa jabatan Direktur yang diangkat tersebut adalah sampai dengan ditutupnya Rapat Umum Pemegang Saham tahunan yang ke-3 (tiga) sejak pengangkatan yang bersangkutan, dengan memperhatikan peraturan perundang-undangan yang berlaku dan tanpa mengurangi hak Rapat Umum Pemegang Saham untuk memberhentikan sewaktu waktu 6. Dengan adanya perubahan tersebut, maka susunan Dewan Komisaris dan Direksi Perseroan adalah sebagai berikut: <table><tr><td>Komisaris Utama</td><td>: Budi Satria*)</td></tr><tr><td>Komisaris Independen</td><td>: Anna Maria Tjiadarma</td></tr><tr><td>Komisaris Independen</td><td>: A.Y. Soepadmo</td></tr><tr><td>Komisaris</td><td>: I.B.K Suamba Manuaba*)</td></tr></table><table><tr><td>Direktur Utama</td><td>: Ebeneser Girsang*)</td></tr><tr><td>Direktur Bisnis</td><td>: Sigit Murtiyoso</td></tr><tr><td>Direktur <i>Risk Management</i></td><td>: Herry prayudi</td></tr><tr><td>Direktur <i>Legal, Compliance & Human Capital</i></td><td>: Ernawan*)</td></tr><tr><td>Direktur Operasional dan Keuangan</td><td>: Arif Wicaksono*)</td></tr></table>	Komisaris Utama	: Budi Satria*)	Komisaris Independen	: Anna Maria Tjiadarma	Komisaris Independen	: A.Y. Soepadmo	Komisaris	: I.B.K Suamba Manuaba*)	Direktur Utama	: Ebeneser Girsang*)	Direktur Bisnis	: Sigit Murtiyoso	Direktur <i>Risk Management</i>	: Herry prayudi	Direktur <i>Legal, Compliance & Human Capital</i>	: Ernawan*)	Direktur Operasional dan Keuangan	: Arif Wicaksono*)
Komisaris Utama	: Budi Satria*)																			
Komisaris Independen	: Anna Maria Tjiadarma																			
Komisaris Independen	: A.Y. Soepadmo																			
Komisaris	: I.B.K Suamba Manuaba*)																			
Direktur Utama	: Ebeneser Girsang*)																			
Direktur Bisnis	: Sigit Murtiyoso																			
Direktur <i>Risk Management</i>	: Herry prayudi																			
Direktur <i>Legal, Compliance & Human Capital</i>	: Ernawan*)																			
Direktur Operasional dan Keuangan	: Arif Wicaksono*)																			

No.	Agenda Agenda	Keputusan Decision												
		7. Memberikan kuasa dan wewenang kepada Direksi dengan hak substitusi untuk melakukan segala tindakan yang diperlukan berkaitan dengan keputusan agenda tersebut sesuai dengan ketentuan yang berlaku, termasuk untuk menyatakan dalam akta Notaris tersendiri dan memberitahukan susunan Dewan Komisaris dan Direksi kepada Kementerian Hukum dan HAM.												
Changes in the composition of the Company's management	1. Changed the nomenclature of the Company's Board of Directors as follows: 2. Confirmed the dismissal of Mr. Ahdi Jumhari Luddin as the Company's President Commissioner. The dismissal of the President Commissioner is effective as of the end of the term of office of the President Commissioner on 28-11-2019 (twenty-eighth November two thousand and nineteen) accompanied by an acknowledgment of gratitude for the contribution of energy, thoughts, and contributions given during his tenure as the President Commissioner. 3. Appointed Mr. Budi Satria as the Company's President Commissioner. The appointed President Commissioner can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the applicable laws and regulations. The end of the term of office of the appointed President Commissioner is until the closing of the 3 (third) Annual General Meeting of Shareholders since the appointment in question with due observance of the prevailing laws and regulations and without prejudice to the right of the General Meeting of Shareholders to dismiss at any time. 4. Transferred the assignments of the names below as members of the Company's Board of Directors - Mr. Ebeneser Girsang was originally the Director of Credit Risk Control and Funding of the Company to become the President Director of the Company - Prayudi was originally the Company's Compliance Director to become the Company's Risk Management Director - Mr. Ernawan was originally Director of Operations and Finance of the Company to become Director of Legal, Compliance & Human Capital. With the term of office continuing the remaining term of office of each in accordance with the decision of the General Meeting of Shareholders the appointment of the person concerned. 5. Appointed Mr. Arif Wicaksono as Director of Operations and Finance. The appointed director can only undertake his duties and functions in his position if he has obtained approval from the Financial Services Authority and complies with the applicable laws and regulations. The end of the term of office of the appointed Director is until the closing of the 3rd (third) annual General Meeting of Shareholders since the appointment in question, with due observance of the prevailing laws and regulations and without prejudice to the right of the General Meeting of Shareholders to dismiss at any time. 6. With these changes, the composition of the Company's Board of Commissioners and Directors is as follows:	<table><tr><td>President Commissioner</td><td>:</td><td>Budi Satria*)</td></tr><tr><td>Independent Commissioner</td><td>:</td><td>Anna Maria Tjiadarma</td></tr><tr><td>Independent Commissioner</td><td>:</td><td>AY Soepadmo</td></tr><tr><td>Commissioner</td><td>:</td><td>IBK Suamba Manuaba*)</td></tr></table>	President Commissioner	:	Budi Satria*)	Independent Commissioner	:	Anna Maria Tjiadarma	Independent Commissioner	:	AY Soepadmo	Commissioner	:	IBK Suamba Manuaba*)
President Commissioner	:	Budi Satria*)												
Independent Commissioner	:	Anna Maria Tjiadarma												
Independent Commissioner	:	AY Soepadmo												
Commissioner	:	IBK Suamba Manuaba*)												

No.	Agenda Agenda	Keputusan Decision
	President director	: Ebeneser Girsang*)
	Business Director	: Sigit Murtiyoso
	Director of Risk Management	: Harry Prayudi
	Director of Legal, Compliance & Human Capital	: Ernawan*)
	Director of Operations and Finance	: Arif Wicaksono*)

7. Granted power and authority to the Board of Directors with substitution rights to take all necessary actions related to the agenda decisions in accordance with applicable regulations, including to declare in a separate Notary deed and notify the composition of the Board of Commissioners and Board of Directors to the Ministry of Law and Human Rights

Dewan Komisaris

Board of Commissioners

Dewan Komisaris merupakan organ utama Bank yang memiliki tanggung jawab di bidang pengawasan atas kebijakan Bank serta memberi nasihat kepada Direksi. Tugas, tanggung jawab, dan kewenangan lain yang dimiliki oleh Dewan Komisaris telah diatur oleh perundang-undangan yang berlaku, di antaranya melalui Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas.

The Board of Commissioners is the Bank's principal organ, charged for monitoring the Bank's policies and advising the Board of Directors. The Board of Commissioners' tasks, responsibilities, and other authority have been controlled by relevant legislation, particularly Law No. 40 of 2007 regulating Limited Liability Companies.

Dasar Hukum

Legal Foundation

Dasar hukum keberadaan Dewan Komisaris, antara lain:

1. Undang-Undang No. 40 tahun 2007 tentang Perseroan Terbatas.
2. Peraturan OJK Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.
3. Peraturan OJK Nomor 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum.
4. Anggaran Dasar Perseroan

Among the legal foundations for the Board of Commissioners' existence are the following:

1. Limited Liability Company Law No. 40 of 2007.
2. FSA Regulation No. 33/POJK.04/2014 on Issuers' or Public Companies' Boards of Directors and Boards of Commissioners.
3. FSA Regulation No. 55/POJK.03/2016 on Corporate Governance in Commercial Banks.
4. Articles of Association of the Company

Pedoman Kerja (Board Manual)

Board Manual

Dewan Komisaris memiliki Pedoman Kerja (*Board Manual*) yang terakhir diperbarui pada tanggal 29 Desember 2021 melalui Surat Keputusan Dewan Komisaris No Kpts B.01/KOM/SKP/12/2021 tentang Pedoman dan Tata Kerja Dewan Komisaris, Komite audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Pedoman Tata Tertib Kerja Dewan Komisaris digunakan sebagai panduan dalam pelaksanaan tugas dan tanggung jawab serta wewenang Dewan Komisaris, serta untuk memberikan arahan bagi Dewan Komisaris dalam melaksanakan fungsi pengawasannya menurut Anggaran Dasar dan peraturan yang berlaku.

The Board of Commissioners maintains a Board Manual, which was last updated on December 29, 2021, by the Board of Commissioners Decree No. Kpts B.01/KOM/SKP/12/2021, which contains Guidelines and Work Procedures for the Board of Commissioners, Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, and Secretary to the Board of Commissioners. The Board of Commissioners' Code of Conduct serves as a guide for carrying out the Board's duties, responsibilities, and authority, as well as providing guidance for the Board's supervisory role in accordance with the Articles of Association and relevant legislation.

Pedoman Kerja Dewan Komisaris berisikan antara lain:

1. Tugas, tanggung jawab dan wewenang
2. Etika Kerja Dewan Komisaris
3. Waktu Kerja
4. Komposisi Dewan Komisaris
5. Tata cara rapat
6. Laporan
7. Korespondensi
8. Struktur organisasi

The Board of Commissioners' Work Guidelines include the following:

1. Responsibilities, obligations, and authorities
2. The Board of Commissioners' Code of Conduct
3. Working Hours
4. Board of Commissioners composition
5. Procedures for meetings
6. Compilation
7. Correspondence
8. Structure of the organisation

Ketentuan Masa Jabatan Terms of Office

Dewan Komisaris diangkat dan diberhentikan oleh RUPS. Setiap kali pengangkatan dilaksanakan akan ditentukan juga masa jabatan Dewan Komisaris, dalam hal tidak menetapkan maka pengangkatan dan pemberhentian anggota Dewan Komisaris tersebut mulai berlaku sejak penutupan RUPS dan berakhir pada penutupan RUPS tahunan yang ke-3 (tiga).

Anggota Dewan Komisaris juga dapat dihentikan sewaktu-waktu dalam suatu keputusan RUPS berdasarkan kenyataan anggota Dewan Komisaris yang bersangkutan antara lain:

1. Tidak/kurang dapat memenuhi kewajibannya yang telah disepakati dalam kontrak manajemen
2. Tidak dapat menjalankan tugasnya dengan baik
3. Melanggar ketentuan anggaran dasar dan/atau peraturan perundang-undangan yang berlaku
4. Melakukan tindakan yang melanggar etika dan/atau kepatutan yang seharusnya dihormati sebagai anggota direksi
5. Terlibat dalam tindakan yang merugikan perseroan dan/atau negara
6. Dinyatakan bersalah dengan putusan pengadilan yang mempunyai kekuatan hukum tetap
7. Mengundurkan diri
8. Alasan lainnya yang dinilai tepat oleh RUPS demi kepentingan dan tujuan Perseroan.

The GMS appoints and dismisses the Board of Commissioners. Each time an appointment is made, the term of office of the Board of Commissioners is also defined; if nothing else is specified, the appointment and dismissal of members of the Board of Commissioners must begin with the close of the GMS and conclude with the close of the third (third) annual GMS.

Members of the Board of Commissioners may also be dismissed at any time by a GMS decision if the member of the Board of Commissioners in question comprises any of the following:

1. S/he is unable/less able to perform the management contract's duties
2. S/he is incapable of carrying out their responsibilities appropriately
3. S/he undertakes a violation of the articles of association's provisions and/or relevant laws and regulations
4. S/he takes activities that breach the ethics and/or propriety that a member of the board of directors should uphold.
5. S/he takes acts that are harmful to the business and/or the state
6. S/he is convicted in a judicial ruling with irreversible legal effect
7. S/he resigns
8. Any other reason judged acceptable by the GMS in light of the Company's interests and goals.

Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris The Board of Commissioners' Resignation and Dismissal Procedures

Seorang anggota Dewan Komisaris dapat mengundurkan diri sebelum masa jabatannya berakhir dengan memberitahukan secara tertulis mengenai maksudnya tersebut kepada Perseroan dengan tembusan kepada Pemegang Saham, Direksi dan anggota Dewan Komisaris lainnya dan Perseroan wajib menyelenggarakan RUPS dalam jangka waktu 90 (sembilan puluh) hari setelah diterimanya Surat pengunduran Diri, untuk menindaklanjuti masalah tersebut atau bila tidak, pengunduran diri akan dianggap sah tanpa memerlukan persetujuan RUPS.

Sebelum pengunduran diri berlaku efektif, Dewan Komisaris yang bersangkutan tetap berkewajiban untuk menyelesaikan tugas dan tanggung jawabnya sesuai dengan Anggaran Dasar.

A member of the Board of Commissioners may resign prior to the expiration of his term of office by notifying the Company in writing, with copies to the Shareholders, the Board of Directors, and other members of the Board of Commissioners, and the Company is required to hold a GMS within 90 (ninety) days of receipt of the resignation letter. Self, to follow up on the subject; else, the resignation would be deemed genuine without the GMS's consent.

Prior to the effective date of the resignation, the relevant Board of Commissioners is still required to perform its duties and obligations in line with the Articles of Association.

Komposisi Dewan Komisaris Tahun 2021

Composition of the Board of Commissioners in 2021

Sesuai Pedoman dan Tata Kerja Dewan Komisaris, jumlah anggota Dewan Komisaris paling sedikit 3 (tiga) orang, dan wajib terdiri dari Komisaris Independen dan Komisaris non Independen, dengan komposisi Komisaris Independen paling sedikit 50% dari jumlah anggota Dewan Komisaris.

According to the Board of Commissioners' Guidelines and Work Procedures, the Board of Commissioners must have a minimum of three (three) members, and must be composed of both Independent and non-Independent Commissioners, having Independent Commissioners constituting at least 50% of the Board of Commissioners' overall membership.

Pada tahun 2021, jumlah dan komposisi Dewan Komisaris Bank Raya mengalami perubahan sesuai keputusan RUPS yang diselenggarakan pada 9 April 2021, yaitu sebagai berikut:

In 2021, the number and content of the Bank Raya Board of Commissioners will change in accordance with the GMS decision adopted on April 9, 2021:

Nama Name	Jabatan Position	Dasar Pengangkatan Basis of Appointment	Masa Jabatan Terms of Office	Periode ke Period
Budi Satria	Komisaris Utama President Commissioner	Akta risalah RUPS T No. 24 tanggal 19 Februari 2020 Deed of minutes of AGMS No. 24 February 19, 2020	2020-2023	1
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	Keputusan RUPS T tanggal 9 April 2021 Decision of the GMS on April 9, 2021	2021-2024	1
Rina Saadah	Komisaris Independen Independent Commissioner	Keputusan RUPS T tanggal 9 April 2021 Decision of the GMS on April 9, 2021	2021-2024	1
Rama Notowidigdo	Komisaris Independen Independent Commissioner	Keputusan RUPS T tanggal 9 April 2021 Decision of the GMS on April 9, 2021	2021-2024	1
Achmad F.C Barir	Komisaris Commissioner	Keputusan RUPS T tanggal 9 April 2021 Decision of the GMS on April 9, 2021	2021-2024	1

Komposisi Dewan Komisaris Bank Raya tahun 2021 telah sesuai dengan ketentuan Pedoman dan Tata Kerja Dewan Komisaris Bank Raya dan ketentuan perundang-undangan lainnya.

In 2021, the Board of Commissioners of Bank Raya will be composed in accordance with the terms of the Board of Commissioners of Bank Raya's Guidelines and Work Procedures and other legislative regulations.

Tugas dan Tanggung Jawab

Occupational Duties and Obligations

Sesuai Pedoman dan Tata Kerja Dewan Komisaris, tugas dan tanggung jawab Dewan Komisaris adalah sebagai berikut:

- Melakukan pengawasan dan bertanggung jawab atas pengawasan terhadap kebijakan pengurusan, jalannya pengurusan pada umumnya baik mengenai Perseroan maupun usaha Perseroan;
- Melaksanakan pengawasan terhadap pelaksanaan tugas dan tanggung jawab Direksi Perseroan serta memberikan nasihat kepada Direksi Perseroan;
- Memastikan penerapan tata Kelola yang baik terselenggara dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi;

According to the Board of Commissioners' Guidelines and Work Procedures, the following are the Board of Commissioners' roles and responsibilities:

- Supervising and being accountable for the oversight of management policies and procedures, as well as the overall course of management, both for the Company and its business;
- Supervising the Company's Board of Directors in carrying out their duties and responsibilities and advising the Board of Directors;
- Ensuring that good governance is implemented in all of the Bank's business activities at all levels or levels of the organisation;

- d. Mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank;
 - e. Dalam melaksanakan pengawasan, Dewan Komisaris dilarang ikut serta dalam pengambilan keputusan kegiatan operasional Bank, kecuali:
 1. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan mengenai batas maksimum pemberian kredit bank umum; dan
 2. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundang-undangan.
 - f. Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawab, Dewan Komisaris wajib membentuk paling sedikit:
 1. Komite Audit;
 2. Komite Pemantau Risiko; dan
 3. Komite Remunerasi dan Nominasi.Dewan Komisaris dapat membentuk Komite Remunerasi dan Komite Nominasi sebagaimana dimaksud pada huruf f butir 3 secara terpisah.
 - g. Pengangkatan dan pemberhentian anggota komite sebagaimana dimaksud pada butir f wajib dilakukan oleh Direksi berdasarkan keputusan rapat Dewan Komisaris.
 - h. Melakukan pengawasan aktif terhadap Fungsi Kepatuhan, dengan:
 1. Mengevaluasi pelaksanaan Fungsi Kepatuhan Bank paling sedikit 2 (dua) kali dalam satu tahun; dan
 2. Memberikan saran untuk meningkatkan kualitas pelaksanaan Fungsi Kepatuhan Bank kepada Direktur Utama Perseroan dengan tembusan kepada Direktur Perseroan yang membawahkan Fungsi Kepatuhan;
 - i. Wajib memastikan bahwa Direksi telah menindaklanjuti temuan audit dan rekomendasi dari Satuan Kerja Audit Intern Bank, auditor ekstern, hasil pengawasan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lain.
 - j. Wajib melaporkan kepada Otoritas Jasa Keuangan paling lambat 7 (tujuh) hari kerja sejak ditemukan:
 1. Pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan; dan/atau
 2. Keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank
 - k. Mengusulkan penunjukan Akuntan Publik (AP) dan/atau Kantor Akuntan Publik (KAP) yang akan memberikan jasa audit atas informasi keuangan historis tahunan kepada Rapat Umum Pemegang Saham
 - l. Melaksanakan paling sedikit:
 1. Pengawasan terhadap penerapan kebijakan remunerasi; dan
 2. Evaluasi secara berkala atas kebijakan remunerasi atas dasar hasil pengawasan sebagaimana dimaksud pada butir l.1 di atas;
 - m. Mengusulkan calon anggota Direksi dan/atau Komisaris untuk disampaikan kepada RUPS
- d. Supervising, monitoring, and assessing the Bank's strategic policies in their execution;
 - e. When supervising the Bank, the Board of Commissioners is barred from engaging in decision-making about its operational activities, save as follows:
 1. Provision of cash to linked parties in accordance with the regulations governing the maximum amount of commercial bank credit that may be granted; and
 2. Any other items specified in the Bank's Articles of Association or applicable laws and regulations.
 - f. To ensure the successful execution of tasks and obligations, the Board of Commissioners is expected to establish at least the following:
 1. Audit Committee;
 2. Risk Monitoring Committee; and
 3. Remuneration and Nomination Committee.The Board of Commissioners may form a Remuneration Committee and a Nomination Committee in addition to the committees mentioned in letter f point 3.
 - g. The Board of Directors shall appoint and remove committee members in accordance with the decision of the Board of Commissioners meeting.
 - h. Actively supervising the Compliance Function, which includes the following:
 1. Evaluating the Bank's Compliance Function at least twice (twice) a year; and
 2. Advising the President Director of the Company on ways to enhance the quality of the Bank's compliance function, with a copy to the Director of the Company in charge of the Compliance Function;
 - i. Requiring to guarantee that the Board of Directors has followed up on audit findings and recommendations from the Bank's Internal Audit Unit, external auditors, the Financial Services Authority's supervision, and/or other authorities' supervision.
 - j. Must notify the Financial Services Authority within seven (seven) working days of discovering:
 1. Violation of financial and banking rules and regulations; and/or
 2. Circumstances or projections of situations that might jeopardise the Bank's business continuity.
 - k. Proposing the appointment of a Public Accountant (AP) and/or a Public Accounting Firm (KAP) to offer audit services to the General Meeting of Shareholders on yearly historical financial information.
 - l. Performing at the very least:
 1. Monitoring the administration of pay policies; and
 2. Periodic examination of the remuneration strategy in light of the outcomes of the above-mentioned monitoring;
 - m. Making recommendations to the GMS for members of the Board of Directors and/or Commissioners.

n. Menyetujui dan mengevaluasi kebijakan Manajemen risiko dan pertanggungjawaban Direksi atas pelaksanaan kebijakan Manajemen Risiko o. Mengevaluasi dan memutuskan permohonan Direksi yang berkaitan dengan transaksi yang memerlukan persetujuan Dewan Komisaris. p. Memberikan persetujuan serta melakukan pengawasan terhadap pelaksanaan rencana kerja Perseroan yang terdiri dari: 1. Rencana Jangka Panjang Perseroan (RJPP); 2. Rencana Bisnis Bank (RBB); 3. Rencana Kerja dan Anggaran Perseroan (RKAP); 4. Rencana Kerja lainnya yang disiapkan Direksi Perseroan. q. Menelaah Laporan Berkala dan Laporan Tahunan yang disiapkan Direksi serta menandatangani Laporan Tahunan; r. Melaporkan kepada Perseroan mengenai kepemilikan sahamnya dan/atau keluarganya pada Perseroan tersebut dan Perseroan lain; s. Terkait pelaksanaan Rapat Umum Pemegang Saham, Dewan Komisaris wajib: 1. Memberikan laporan tentang tugas pengawasan yang telah dilakukan selama tahun buku yang baru lampau. 2. Memberikan pendapat dan saran mengenai masalah yang dianggap penting bagi kepengurusan Perseroan; 3. Melaporkan apabila terjadi gejala menurunnya kinerja Perseroan; 4. Memberikan penjelasan, pendapat dan saran mengenai Laporan tahunan apabila diminta; t. Melaksanakan kewajiban lainnya dalam rangka tugas pengawasan dan pemberian nasihat, sepanjang tidak bertentangan dengan peraturan perundang-undangan, Anggaran Dasar, dan/atau Keputusan Rapat Umum Pemegang Saham.	n. Approval and evaluation of the risk management policy, as well as the Board of Directors' responsibilities for its execution o. Evaluating and approving requests from the Board of Directors for transactions requiring the Board of Commissioners' approval. p. Approving and monitoring the execution of the Company's work plan, which includes the following: 1. The Long-Term Plan of the Company (RJPP); 2. Business Plan for a Bank (RBB); 3. The Company's Work Plan and Budget (RKAP); 4. Additional work plans created by the Company's Board of Directors. q. Examining the Board of Directors' periodic reports and annual reports and signing the annual report; r. Reporting to the Company on their ownership of shares and/or their families' ownership of shares in the Company and other firms; s. With respect to the General Meeting of Shareholders' implementation, the Board of Commissioners is obligated to: 1. Submitting a report on the supervisory tasks performed during the previous fiscal year. 2. Providing thoughts and comments on matters deemed critical to the Company's management; 3. Notifying management if the Company's performance begins to deteriorate; 4. Providing explanations, thoughts, and proposals in response to requests for the annual report; t. Performing additional activities associated with supervisory responsibilities and offering advice, as long as they do not contradict with applicable laws and regulations, the Articles of Association, and/or the General Meeting of Shareholders' Decisions.

Pembagian Tugas Dewan Komisaris

Division of Duties of the Board of Commissioners

Pembagian kerja Dewan Komisaris juga telah diatur di dalam Pedoman Kerja Dewan Komisaris dan untuk kelancaran tugasnya Dewan Komisaris dapat mengangkat seorang Sekretaris Dewan Komisaris. pembagian kerja Dewan Komisaris sebagai berikut:

1. Komisaris Utama/Komisaris Independen melakukan tugas-tugas koordinasi dari semua kegiatan anggota Dewan Komisaris.
2. Komisaris Independen:
 - Mengetuai komite yang dibentuk Dewan Komisaris yaitu Komite Audit, Komite Pemantau Risiko dan Komite Remunerasi dan Nominasi.

The Board of Commissioners' work division has also been controlled in the Board of Commissioners' Work Guidelines, and for the seamless performance of its responsibilities, the Board of Commissioners may designate a Secretary to the Board of Commissioners. The Board of Commissioners' work is divided as follows:

1. The President Commissioner/Independent Commissioner is responsible for organising the Board of Commissioners members' work.
2. Independent Commissioner:
 - Chairing the Board of Commissioners' committees, including the Audit Committee, the Risk Monitoring Committee, and the Remuneration and Nomination Committee.

3. Komisaris mewakili Pemegang Saham dari BRI:
 - Memprioritaskan kepentingan perusahaan dalam mengembangkan usahanya agar disetujui oleh BRI.
 - Mensinergikan kegiatan perusahaan dengan BRI bagi pengembangan perusahaan.

Hak Dewan Komisaris

1. Anggota Dewan Komisaris berhak diberikan honorarium dan tunjangan fasilitas termasuk tantiem dan santunan purna jabatan yang jenis dan jumlahnya ditetapkan oleh RUPS dengan memperhatikan ketentuan peraturan-undangan yang berlaku.
2. Berhak melakukan pembagian kerja diantara para anggota Dewan Komisaris diatur oleh mereka sendiri dan untuk kelancaran tugasnya Dewan Komisaris dapat dibantu oleh Sekretaris Dewan Komisaris yang diangkat oleh Dewan Komisaris atas beban Perseroan.
3. Seorang anggota Dewan Komisaris dapat mengundurkan diri dari jabatannya sebelum masa jabatannya berakhir dengan memberitahukan secara tertulis mengenai maksudnya tersebut kepada Perseroan dengan tembusan kepada Pemegang Saham, Direksi dan anggota Dewan Komisaris lainnya sekurang-kurangnya 30 (tiga puluh hari) sebelum tanggal pengunduran dirinya.

Wewenang Dewan Komisaris

1. Memeriksa buku-buku, surat-surat, serta dokumen-dokumen lainnya, memeriksa kas untuk keperluan verifikasi dan lain-lain surat berharga, dan memeriksa kekayaan Perseroan.
2. Memasuki pekarangan, gedung, dan kantor yang dipergunakan oleh Perseroan.
3. Meminta penjelasan dari Direksi dan/atau pejabat lainnya mengenai segala persoalan yang menyangkut pengelolaan Perseroan.
4. Mengetahui segala kebijakan dan tindakan yang telah dan akan dijalankan oleh Direksi.
5. Meminta Direksi dan/atau pejabat lainnya di bawah Direksi dengan sepengetahuan Direksi untuk menghadiri rapat Dewan Komisaris.
6. Memberhentikan sementara anggota Direksi sesuai dengan ketentuan Anggaran Dasar.
7. Membentuk Komite Audit, Komite Pemantau Risiko, Komite Remunerasi dan Nominasi dan komite-komite lain, jika dianggap perlu dengan memperhatikan kemampuan Perseroan.
8. Menggunakan tenaga ahli untuk hal tertentu dan dalam jangka waktu tertentu atas beban Perseroan, jika dianggap perlu.
9. Melakukan tindakan pengurusan Perseroan dalam keadaan tertentu untuk jangka waktu tertentu sesuai dengan ketentuan Anggaran Dasar.
10. Menghadiri rapat Direksi dan memberikan pandangan-pandangan terhadap hal-hal yang dibicarakan.
11. Menjalankan kewenangan yang diberikan oleh RUPS antara lain:
 - Menentukan gaji / honorarium Direksi
 - Melakukan hapus tagih

3. The Commissioner acts on behalf of BRI's shareholders:
 - Putting the Company's interests first in expanding its BRI-approved business.
 - Aligning corporate operations with BRI for the sake of business growth.

Rights of the Board of Commissioners

1. Members of the Board of Commissioners are eligible to receive honoraria and facility allowances, including tantiem and post-service benefits, as decided by the GMS in accordance with relevant laws and regulations.
2. The Board of Commissioners has the authority to divide their work among themselves, and for the purpose of carrying out their duties efficiently, the Board of Commissioners may be assisted by the Secretary to the Board of Commissioners, who is appointed by the Board of Commissioners at the expense of the Company.
3. A member of the Board of Commissioners may resign his or her position prior to the expiration of his or her term of office by notifying the Company in writing of his or her intention, with a copy to the Shareholders, the Board of Directors, and other members of the Board of Commissioners, at least 30 (thirty) days prior to the date of his or her resignation.

The Board of Commissioners' Authorities

1. Inspecting books, letters, and other papers; inspecting cash and other securities for verification purposes; and inspecting the Company's assets.
2. Gaining access to the Company's yards, buildings, and offices.
3. Demanding an explanation from the Board of Directors and/or other Company authorities about all matters pertaining to the Company's management.
4. Having the cognisance of all Board of Directors policies and actions that have been and will be implemented.
5. Inviting the Board of Directors and/or other officials with knowledge of the Board of Directors to attend the meeting of the Board of Commissioners.
6. Dismissing members of the Board of Directors on a temporary basis in line with the Articles of Association.
7. Appointing an Audit Committee, a Risk Monitoring Committee, a Remuneration and Nominations Committee, and any other committees considered required in light of the Company's capabilities.
8. If judged essential, retaining specialists for certain subjects and for a specified amount of time at the cost of the Company.
9. Taking steps to administer the Company in compliance with the Articles of Association's requirements for a certain length of time.
10. Attending meetings of the Board of Directors and offering input on the topics covered.
11. Executing the GMS's authority, including the following:
 - Determining the Board of Directors' compensation/honorarium
 - Conducting a write-off

12. Memberikan persetujuan kebijakan manajemen risiko yang dibuat oleh Direksi.
13. Melaksanakan kewenangan pengawasan lainnya sepanjang tidak bertentangan dengan peraturan perundang-undangan, Anggaran Dasar, dan/atau keputusan Rapat Umum Pemegang Saham.
12. Approval of the Board of Directors' risk management policies.
13. Exercising additional supervisory authorities according with applicable laws and regulations, the Articles of Association, and/or the General Meeting of Shareholders' resolutions.

Etika Kerja Work Ethics

Dalam melaksanakan tugas, wewenang, kewajiban, dan tanggung jawab sebagaimana dimaksud diatas, anggota Dewan Komisaris harus senantiasa bertindak sesuai dengan etika kerja sebagai berikut:

1. Mematuhi Anggaran Dasar dan peraturan perundang - undangan serta prinsip-prinsip profesionalisme, efisiensi, transparansi, kemandirian, akuntabilitas, pertanggungjawaban, serta kewajiban.
2. Beritikad baik, penuh kehati-hatian, dan bertanggung jawab dalam menjalankan tugas pengawasan dan pemberian nasihat kepada Direksi untuk kepentingan Perseroan dan sesuai dengan maksud dan tujuan Perseroan.
3. Tidak boleh dipengaruhi oleh pihak lain dalam melaksanakan tugas dan pengambilan keputusan yang menyebabkan penyalahgunaan wewenang dan/atau pembuatan keputusan yang tidak tepat.
4. Dilarang memanfaatkan Perseroan untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang dapat merugikan atau mengurangi keuntungan Perseroan.
5. Dilarang mengambil dan/atau menerima keuntungan pribadi dari Perseroan selain remunerasi dan fasilitas lainnya yang ditetapkan.
6. Dilarang melakukan transaksi yang mempunyai benturan kepentingan yang merugikan perusahaan dan/atau mengambil keuntungan pribadi dari kegiatan Perseroan selain honorarium, tunjangan dan fasilitas yang diterimanya sebagai anggota Dewan Komisaris.
7. Dalam hal terdapat benturan kepentingan baik secara langsung maupun tidak langsung terhadap suatu transaksi, kontrak atau kontrak yang diusulkan dalam mana Perseroan menjadi salah satu pihaknya, maka anggota Dewan Komisaris :
 - a. Harus memberikan pernyataan tertulis atau dinyatakan dalam risalah rapat tentang adanya benturan kepentingan;
 - b. Tidak ikut serta dalam pengambilan keputusan.
8. Dilarang untuk memberikan atau menawarkan kepada pelanggan atau seorang pejabat pemerintah untuk mempengaruhi atau menerima, baik langsung ataupun tidak langsung sesuatu yang berharga sebagai imbalan atas apa yang telah dilakukannya dan tindakan lainnya sesuai peraturan perundang-undangan yang berlaku; dan
9. Memberikan contoh keteladanan dengan mendorong terciptanya perilaku etis dan menjunjung tinggi standar etika Perseroan.
- Members of the Board of Commissioners shall always behave in accordance with the following work ethics while carrying out their duties, authority, obligations, and responsibilities as outlined above:
 1. Adhering to the Articles of Association and applicable laws and regulations, as well as the professional, efficient, transparent, independent, accountable, responsible, and fair principles.
 2. Being prudence and accountability in carrying out supervisory responsibilities and advising the Board of Directors for the benefit of the Company and in line with the Company's aims and objectives.
 3. Must not be influenced by others in carrying out tasks or making judgments that result in an abuse of power or in making incorrect decisions.
 4. It is outlawed to utilise the Company for personal, family, or third-party purposes that might jeopardise or impair the Company's profitability.
 5. Taking and/or receiving personal advantages from the Company in excess of the compensation and other perks indicated is forbidden.
 6. It is forbidden to engage in transactions that create a conflict of interest and/or to derive personal advantages from the Company's operations other than the honorarium, allowances, and facilities received as a member of the Board of Commissioners.
 7. In the event that a proposed transaction, contract, or contract to which the Company is a party creates a direct or indirect conflict of interest, the members of the Board of Commissioners:
 - a. Must make a written declaration or include a statement in the meeting minutes indicating the presence of a conflict of interest;
 - b. Abstaining from decision-making.
 8. It is prohibited to provide or offer anything of value to a consumer or a government official in order to influence or receive something of worth in exchange for what he has done and other acts consistent with current rules and regulations; and
 9. Leading by example by promoting ethical conduct and adhering to the Company's ethical standards.

Pengelolaan Benturan Kepentingan Dewan Komisaris Management of the Board of Commissioners' Conflicts of Interest

Benturan kepentingan adalah kondisi tertentu di mana kepentingan individual anggota Dewan Komisaris berpotensi untuk bertentangan dengan kepentingan Perseroan untuk meraih laba, meningkatkan nilai Perseroan, mencapai visi dan menjalankan misi Perseroan serta melaksanakan keputusan Rapat Umum Pemegang Saham.

Berkaitan dengan ini, Dewan Komisaris Bank Raya telah menyusun Surat Keputusan Bersama Dewan Komisaris dan Direksi Bank Raya Nomor 69/KOM/BRIAGRO/VIII/2014 dan No Kpts.19/DIR.01/KK/08/2014 tentang pemberlakuan pedoman Umum penanganan Benturan Kepentingan (*Conflict of Interest*) Bank Raya tanggal 21 Agustus 2014.

Atas hal tersebut maka anggota Komisaris hendaknya senantiasa harus:

1. Mengutamakan kepentingan Perseroan dan tidak mengurangi keuangan Perseroan dalam hal terjadi benturan kepentingan.
2. Menghindari diri dari pengambilan keputusan dalam situasi dan kondisi adanya benturan kepentingan.
3. Melakukan pengungkapan hubungan kekeluargaan, hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan dengan anggota Komisaris lain dan/atau anggota Direksi dan/atau Pemegang Saham pengendali Bank dan/atau pihak lainnya dalam rangka bisnis Perseroan.
4. Melakukan pengungkapan dalam hal pengambilan keputusan tetap harus diambil pada kondisi adanya benturan kepentingan.

Conflict of interest refers to a situation in which the members of the Board of Commissioners' personal interests may conflict with the Company's interests in maximising profit, increasing the value of the Company, achieving the Company's vision and mission, and carrying out the General Meeting of Shareholders' decisions.

Bank Raya's Board of Commissioners has issued a Joint Decree No. 69/KOM/BRIAGRO/VIII/2014 and No. Kpts.19/DIR.01/KK/08/2014 about the use of General Guidelines for Collision Handling. Conflict of Interest Statement from Bank Raya dated August 21, 2014.

Members of the Board of Commissioners shall constantly maintain the following standards in this regard:

1. Putting the Company's interests first and refraining from decreasing the Company's financial resources in the case of a conflict of interest.
2. Eschewing decision-making in settings and circumstances when there is a conflict of interest.
3. Disclosing family relationships, financial relationships, management relationships, and ownership relationships with other members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders of the Bank, as well as with other parties in connection with the Company's business.
4. In the event of a conflict of interest, disclosure in terms of decision-making must still be made.

Program Pengenalan Perusahaan Bagi Komisaris Baru Orientation Program to Introduce Businesses to New Commissioners

Program pengenalan kepada Dewan Komisaris yang baru diangkat bertujuan untuk memberikan pengetahuan mengenai Perseroan, agar dapat memahami tugas dan tanggung jawab sebagai Dewan Komisaris dan proses bisnis Perseroan yang dilaksanakan oleh Direksi, sehingga dapat bekerja selaras dengan organ Perseroan lainnya.

Sekretaris Perusahaan sebagai pelaksana program pengenalan bagi Dewan Komisaris yang baru diangkat, mempersiapkan materi program pengenalan yang meliputi program pengenalan Perseroan berkaitan dengan tata Kelola perusahaan, Kinerja Bank Raya, Manajemen risiko dan hal-hal yang dianggap penting lainnya.

The newly appointed Board of Commissioners' orientation programme aims to familiarise them with the Company in order for them to understand their duties and responsibilities as Commissioners, as well as the business processes carried out by the Board of Directors, in order for them to work in harmony with other Company organs.

The Corporate Secretary, as the executor of the newly constituted Board of Commissioners' introduction programme, prepares material for the programme, which includes an overview of the Company's corporate governance programme, Bank Raya performance, risk management, and other critical concerns.

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organiser	Waktu dan Tempat Time and place
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	Pendidikan "Executive Coaching Bank Management for Board of Commissioners" Education "Executive Coaching Bank Management for Board of Commissioners"	LPPI	22 - 23 Mei 2021 22 - 23 May 2021
Rina Sa'adah	Komisaris Independen Independent Commissioner	Pendidikan "Executive Coaching Bank Management for Board of Commissioners" Education "Executive Coaching Bank Management for Board of Commissioners"	LPPI	22 - 23 Mei 2021 22 - 23 May 2021
Rama Notowidigdo	Komisaris Independen Independent Commissioner	Pendidikan "Executive Coaching Bank Management for Board of Commissioners" Education "Executive Coaching Bank Management for Board of Commissioners"	LPPI	22 - 23 Mei 2021 22 - 23 May 2021
Achmad F.C. Barir	Komisaris Commissioner	Pendidikan "Executive Coaching Bank Management for Board of Commissioners" Education "Executive Coaching Bank Management for Board of Commissioners"	LPPI	22 - 23 Mei 2021 22 - 23 May 2021

Pelaksanaan Tugas Dewan Komisaris Execution of the Board of Commissioners' Duties

Dewan Komisaris telah menjalankan fungsi, tugas dan tanggung jawabnya sebagaimana tertuang dalam Pedoman Kerja Dewan Komisaris. Kegiatan yang dilakukan Dewan Komisaris antara lain:

1. Penggantian dan/atau pengangkatan Pengurus Perseroan telah memperhatikan rekomendasi dari Komite Remunerasi dan Nominasi dan telah memperoleh persetujuan dalam RUPS Tahunan 9 April 2021.
2. Dewan Komisaris telah melakukan pengawasan terhadap pelaksanaan tugas dan tanggung jawab Direksi secara berkala maupun sewaktu-waktu, serta memberikan nasihat kepada Direksi yang pelaksanaannya dilakukan rutin minimal 1 (satu) kali dalam sebulan melalui forum Rapat Direksi dan Komisaris. Selain itu Dewan Komisaris juga terus memantau perkembangan proses transformasi menjadi bank digital.
3. Dewan Komisaris tidak terlibat dalam pengambilan keputusan kegiatan operasional Bank, kecuali dalam hal penyediaan dana kepada pihak terkait dan hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank dan/atau peraturan perundangan yang berlaku dalam rangka melaksanakan fungsi pengawasan.
4. Dewan Komisaris telah memastikan bahwa Direksi telah menindaklanjuti Temuan Audit dan Rekomendasi dari Satuan Kerja Audit Intern (SKAI) Bank, Auditor Eksternal, hasil Pengawasan Otoritas Jasa Keuangan dan/atau hasil Pengawasan Otoritas lainnya.

The Board of Commissioners has discharged its activities, duties, and obligations in accordance with the Board of Commissioners' Work Guidelines. The Board of Commissioners is responsible for the following activities:

1. The recommendations of the Remuneration and Nomination Committee have been taken into account when the company's management has been replaced or hired. This decision was made at the Annual General Meeting of Shareholders on April 9, 2021.
2. The Board of Commissioners has monitored the Board of Directors' performance of its duties and responsibilities on a regular or ad hoc basis, as well as providing advice to the Board of Directors, whose performance is routinely monitored at least once a month through the Board of Directors and Commissioners Meeting forum. In addition, the Board of Commissioners is still in charge of the process of becoming a digital bank.
3. The Board of Commissioners is not involved in the running of the bank, except for providing money to connected parties and other issues that are set out in the bank's articles of association and/or applicable laws and regulations for the purpose of carrying out its supervisory duty.
4. The Board of Commissioners ensured that the Board of Directors followed up on audit findings and recommendations from the bank's internal audit unit (SKAI), external auditors, and the Financial Services Authority's and/or other authorities' supervision.

5. Dewan Komisaris telah melaksanakan tugas dan tanggung jawab secara independen. Hal ini tercantum dalam Pedoman dan Tata Kerja Dewan Komisaris berdasarkan Surat Keputusan Dewan Komisaris No.Kpts.B.01/KOM/SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Kriteria independensi Dewan Komisaris tercantum dalam butir IV. Etika Kerja.
6. Dewan Komisaris telah membentuk komite-komite yang meliputi Komite Audit, Komite Pemantau Risiko, serta Komite Remunerasi dan Nominasi yang dituangkan dalam SK Direksi.
7. Perubahan susunan keanggotaan komite telah dilakukan Direksi berdasarkan keputusan rapat Dewan Komisaris melalui surat Dewan Komisaris No: R.62/DK-IV/2021 tanggal 28 April 2021 perihal Perubahan Susunan Anggota Komite Dewan Komisaris BRI Agro (telah berganti nama menjadi Bank Raya) dan Surat Dewan Komisaris No. R.149/DK-X/2021 tanggal 11 Oktober 2021 perihal Reposisi Anggota Komite Pemantau Risiko BRI Agro (telah berganti menjadi BANK RAYA).
8. Dewan Komisaris telah memastikan bahwa komite yang dibentuk telah menjalankan tugasnya secara efektif melalui rapat-rapat dan laporan komite.
9. Dewan Komisaris telah melakukan rapat internal sebanyak 36 (tiga puluh enam) kali selama tahun 2021 dengan pembahasan sesuai agenda rapat.
5. The Board of Commissioners acted independently in carrying out its duties and obligations. This is stated in the Board of Commissioners' Guidelines and Work Procedures, which are based on the Board of Commissioners' Decree No.Kpts.B.01/KOM/SKP/12/2021 dated December 29, 2021 regarding the Board of Commissioners' Work Guidelines for the Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, and Secretary to the Board of Commissioners. People on the Board of Commissioners are free to do what they want, because of their work ethics.
6. Board of Commissioners Decree: The Board of Commissioners set up a number of groups to help them do their jobs better. These groups are called "committees." These groups are called "committees."
7. Because Board of Directors amended the committee composition in accordance with the Board of Commissioners' decision on April 28, 2021, via Board of Commissioners Letter No. Board of Commissioners Letter No. 62/DK-IV/2021 dated April 28, 2021 regarding Amendments to the Composition of the Committee Members of the Board of Commissioners of BRI Agro (which has changed its name to Bank Raya) and Board of Commissioners Letter No. reg. dated October 11, 2021 (has been changed to BANK RAYA).
8. Through committee meetings and reports, the Board of Commissioners ensured that the committees created performed their functions properly.
9. During the year 2021, the Board of Commissioners held 36 (thirty-six) internal meetings, where they discussed the meeting agenda.

Pelatihan dan Peningkatan Kompetensi Dewan Komisaris

Training and Development of the Board of Commissioners' Competencies

Untuk menunjang Dewan Komisaris dalam melaksanakan tugas dan tanggung jawabnya, Bank Raya memberikan kesempatan kepada anggota Dewan Komisaris untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal Perseroan atau yang diselenggarakan oleh pihak eksternal.

Sepanjang tahun 2021, anggota Dewan Komisaris Bank Raya telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

Bank Raya offers opportunities for members of the Board of Commissioners to engage in training and competence development programmes, whether conducted by the Company or by third parties, to assist them in carrying out their duties and obligations.

Members of Bank Raya's Board of Commissioners engaged in the following training and competence development programmes during 2021:

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organiser	Waktu dan Tempat Time and place
Budi Satria	Komisaris Utama President Commissioner	- Refreshment Manajemen Risiko Risk Management Refreshment - Global Culture Survey 2021: The Link between culture and competitive advantage	Efektifpro PWC Indonesia	31 Maret 2021, Online March 31, 2021, Online 2 Desember 2021, Online Desember 2, 2021, Online
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	- Executive Coaching Bank Management for Board of Commissioners - Webinar Digital Risk Leadership: Orchestrating Business & Boardroom in Mitigating Risk	LPPI LPPI	22-23 Mei 2021, Jakarta 22-23 May 2021, Jakarta 24-26 Agustus 2021, Online 24-26 August 2021, Online
Rina Saadah	Komisaris Independen Independent Commissioner	- Executive Coaching Bank Management for Board of Commissioners - Pendidikan Refreshment Bank Executive Overview	LPPI LPPI	22-23 Mei 2021, Jakarta 22-23 May 2021, Jakarta 21-22 Oktober 2021, Online 21-22 October 2021, Online
Rama Notowidigdo	Komisaris Independen Independent Commissioner	- Executive Coaching Bank Management for Board of Commissioners - Refreshment Executive Coaching Bank Management for BOC - Pendidikan Refreshment Bank Executive Overview	LPPI LPPI LPPI	22-23 Mei 2021, Jakarta 22-23 May 2021, Jakarta 26-27 Juni 2021, Online 26-27 Juni 2021, Online 21-22 Oktober 2021, Online 21-22 October 2021, Online
Achmad F.C. Barir	Komisaris Commissioner	- Executive Coaching Bank Management for Board of Commissioners	LPPI	22-23 Mei 2021, Jakarta 22-23 May 2021, Jakarta

Penilaian Kinerja Komite-Komite yang Berada di Bawah Dewan Komisaris

Evaluation of the Performance of the Committees Reporting to the Board of Commissioners

Dewan Komisaris memiliki komite-komite penunjang yang telah memiliki tugas dan tanggung jawab untuk mendukung kinerja Dewan Komisaris. Komite-komite tersebut telah memiliki pedoman kerja yang jelas, sehingga pelaksanaan tugasnya bisa terarah dan efektif. Komite-komite yang berada di bawah Dewan Komisaris adalah Komite audit, Komite pemantau risiko dan Komite remunerasi dan Nominasi.

Kriteria penilaian yang digunakan Dewan Komisaris antara lain:

1. Kehadiran dan keaktifan dalam rapat.
2. Rekomendasi yang diberikan kepada Dewan Komisaris
3. Pelaporan yang tepat waktu

Dewan Komisaris menilai kinerja Komite Audit, Komite Pemantau Risiko dan Komite Remunerasi dan Nominasi pada tahun 2021 sangat baik dengan memberikan laporan dan rekomendasi yang sangat membantu bagi pelaksanaan tugas Dewan Komisaris serta memiliki catatan penyelenggaraan rapat yang sesuai dengan pedoman dan tata laksana kegiatan masing-masing Komite.

The Board of Commissioners has supporting committees tasked with the roles and responsibilities of assisting the Board of Commissioners in its performance. These committees already have defined work standards in place to ensure that their responsibilities are carried out efficiently and effectively. The Audit Committee, the Risk Monitoring Committee, and the Remuneration and Nomination Committee all report to the Board of Commissioners.

The Board of Commissioners' evaluation criteria include the following:

1. Meeting attendance and participation.
2. Submission of recommendations to the Board of Commissioners
3. Accurate reporting

The Board of Commissioners believes that the Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee performed admirably in 2021 by providing reports and recommendations that were extremely helpful in carrying out the Board of Commissioners' duties and maintaining a record of meeting in accordance with the guidelines and procedures for each Committee's activities.

Penilaian Kinerja Dewan Komisaris Performance Evaluation of the Board of Commissioners

Penilaian kinerja Dewan Komisaris dapat dilakukan melalui penilaian sendiri (*self assessment*) serta penilaian yang dilakukan oleh Pemegang Saham melalui RUPS.

Penilaian Kinerja Dewan Komisaris Dalam RUPS

Dalam setiap RUPS Tahunan, Pemegang Saham akan mengevaluasi kinerja Dewan Komisaris berdasarkan tugas kewajiban yang tercantum dalam peraturan perundang-undangan yang berlaku dan Anggaran Dasar maupun amanat yang diberikan Pemegang Saham.

Kriteria Evaluasi Kinerja Dewan Komisaris

Pemegang Saham menetapkan kriteria kinerja Dewan Komisaris maupun individu anggota Dewan Komisaris. Kriteria evaluasi kinerja individu Dewan Komisaris antara lain meliputi:

1. Tingkat kehadirannya dalam rapat Dewan Komisaris maupun rapat dengan komite-komite yang ada.
2. Kontribusinya dalam proses pengawasan Perseroan.
3. Keterlibatannya dalam penugasan tertentu.
4. Komitmennya dalam memajukan kepentingan perusahaan.
5. Ketaatan terhadap peraturan perundang-undangan yang berlaku serta kebijakan perusahaan.

Hasil Penilaian Kinerja Dewan Komisaris

Hasil penilaian Kinerja oleh pemegang Saham dilakukan melalui evaluasi internal berdasarkan laporan dan rekomendasi Dewan Komisaris.

Penilaian Kinerja Dewan Komisaris dengan Metode Self Assessment

Penilaian kinerja Dewan Komisaris dilakukan dengan menggunakan metode penilaian sendiri (*self-assessment*) sesuai SEOJK Nomor 13/SEOJK.03/2017 tahun 2017 perihal Penerapan Tata Kelola Bagi Bank Umum. Penilaian dilakukan secara periodik setiap semester dengan melaporkan kepada OJK. Pihak yang melakukan *Self-assessment* GCG dilakukan oleh tim internal Bank Raya.

The performance of the Board of Commissioners may be evaluated both internally and externally through the GMS.

Evaluation of Board of Commissioners' Performance within GMS

The Shareholders shall review the Board of Commissioners' performance in each Annual GMS based on the responsibilities and obligations set out in relevant laws and regulations, the Articles of Association, and the mandate granted by the Shareholders.

Criteria for Evaluating the Performance of the Board of Commissioners

Shareholders establish performance standards for the Board of Commissioners and its individual members. The following factors are used to evaluate the Board of Commissioners' individual performance:

1. The level of attendance at meetings of the Board of Commissioners and existing committees.
2. His/her contribution to the Company's oversight procedure.
3. His/her participation in certain tasks.
4. His/her dedication to advance the company's interests.
5. Adherence to relevant rules and regulations, as well as corporate policies.

Results of the Board of Commissioners' Performance Evaluation

The results of the performance appraisal by shareholders are carried out through internal evaluations based on reports and recommendations from the Board of Commissioners.

Evaluation of Board of Commissioners' Performance by a Self-Assessment Method

The Board of Commissioners' performance is evaluated via a self-assessment process in line with SEOJK No. 13/SEOJK.03/2017 of 2017 on the Implementation of Good Corporate Governance for Commercial Banks. Assessment is conducted on a semester-by-semester basis, with reports to FSA. The party in charge of the GCG Bank Raya's internal staff conducts self-assessment.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
A. Governance Structure		
1.	Jumlah Anggota Dewan Komisaris paling sedikit 3 (tiga) orang dan tidak melampaui jumlah Anggota Direksi. 	

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
4.	Dewan Komisaris tidak merangkap jabatan kecuali terhadap hal-hal yang telah ditetapkan dalam Peraturan Otoritas Jasa Keuangan tentang Tata Kelola Bank Umum, yaitu : a) merangkap jabatan sebagai Anggota Direksi, Anggota Dewan Komisaris atau Pejabat Eksekutif pada 1(satu) Lembaga atau Perusahaan bukan Lembaga Keuangan; atau; b) merangkap jabatan sebagai Anggota Direksi, Anggota Dewan Komisaris atau Pejabat Eksekutif yang melaksanakan fungsi Pengawasan pada 1 (satu) Perusahaan Anak bukan bank yang dikendalikan Bank; c) Komisaris Non Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usaha Bank; dan/atau d) Anggota Dewan Komisaris menduduki jabatan pada organisasi atau Lembaga Nirlaba The Board of Commissioners does not hold concurrent positions except for matters that have been stipulated in the Financial Services Authority Regulation concerning Commercial Bank Governance, namely: a) concurrently serving as a Member of the Board of Directors, Member of the Board of Commissioners or Executive Officer at 1(one) Institution or Company that is not a Financial Institution; or; b) concurrently serving as a Member of the Board of Directors, Member of the Board of Commissioners or Executive Officer carrying out the Supervision function in 1(one) non-bank Subsidiary Company controlled by the Bank; c) Non-Independent Commissioners carry out the functional duties of the Bank's Shareholders in the form of legal entities in the Bank's business group; and/or d) Members of the Board of Commissioners occupy positions in non-profit organizations or institutions	Dewan Komisaris tidak merangkap jabatan kecuali terhadap hal-hal yang telah ditetapkan dalam POJK Tata Kelola Bank Umum, yaitu : a) Salah satu Komisaris Independent, yaitu Rama Gutama Notowidigdo merangkap jabatan sebagai Direktur Utama di Perusahaan bukan Lembaga Keuangan, atas persetujuan Otoritas Jasa Keuangan. Berikut Pernyataan bukti pengunduran diri dari 4 Perusahaan lain yaitu : 1) berdasarkan Akta No. 4 tanggal 27 Mei 2021 Perihal Pernyataan Keputusan Para Pemegang Saham PT Nostra Solusi Teknologi, 2) Keputusan Sirkuler Pemegang Saham PT Simplefi Teknologi Indonesia tanggal 23 Juli 2021 Perihal pengunduran diri Rama Gutama Notowidigdo sebagai Direktur Utama 3) Keputusan Sirkuler Pemegang Saham PT Awan Tunai Indonesia tanggal 30 Juli 2021 tentang persetujuan pengunduran diri Rama Gutama Notowidigdo dan 4) Surat Kesepakatan Bersama PT Karya Citra Sakti pada tanggal 19 April 2021 perihal pengunduran diri Rama Gutama Notowidigdo b) merangkap jabatan sebagai Anggota Direksi, Anggota Dewan Komisaris atau Pejabat Eksekutif yang melaksanakan fungsi Pengawasan pada 1(satu) Perusahaan Anak bukan Bank yang dikendalikan Bank c) Komisaris Non Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usaha Bank; dan/atau d) Tidak ada Komisaris Independen yang diangkat kembali setelah menjabat selama 2 (dua) periode masa jabatan berturut-turut . The Board of Commissioners does not hold concurrent positions except for matters that have been stipulated in the POJK for Corporate Governance of Commercial Banks, namely: a) One of the Independent Commissioners, namely Rama Gutama Notowidigdo concurrently serves as the President Director of a non-financial company, with the approval of the Financial Services Authority. The following is a statement of proof of resignation from 4 other companies, namely: 1) based on Deed No. 4 dated 27 May 2021 Regarding the Decision Statement of the Shareholders of PT Nostra Solusi Teknologi, 2) Circular Decision of Shareholders of PT Simplefi Teknologi Indonesia dated July 23, 2021 Regarding the resignation of Rama Gutama Notowidigdo as President Director 3) Circular Decision of the Shareholders of PT Awan Tunai Indonesia dated July 30, 2021 regarding the approval of the resignation of Rama Gutama Notowidigdo and 4) Letter of Agreement with PT Karya Citra Sakti on April 19, 2021 regarding the resignation of Rama Gutama Notowidigdo a) concurrently serving as a Member of the Board of Directors, Member of the Board of Commissioners or Executive Officer carrying out the Supervision function in 1(one) non-Bank Subsidiary Company controlled by the Bank b) Non-Independent Commissioners carry out the functional duties of the Bank's Shareholders in the form of legal entities in the Bank's business group; and/or c) There is no Independent Commissioner who has been reappointed after serving for 2 (two) consecutive terms of office.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
5.	Komisaris Independen dapat merangkap jabatan sebagai Ketua Komite paling banyak pada 2 (dua) Komite di bank yang sama The Independent Commissioner can hold concurrent positions as Committee Chair in a maximum of 2 (two) Committees in the same bank	Tidak terdapat rangkap jabatan sebagai Ketua Komite oleh Komisaris Independen pada Bank, karena hal-hal sebagai berikut : a) 1(satu) Komisaris Independen menjabat sebagai ketua komite audit, yaitu atas nama Rina Saadah b) 1(satu) Komisaris Independen menjabat sebagai Ketua Komite Pemantau Risiko, yaitu atas nama Eko B. Supriyanto c) 1(satu) Komisaris Independen menjabat sebagai Ketua Komite Remunerasi dan Nominasi, yaitu atas nama Rama Notowidigdo There is no concurrent position as Chairman of the Committee by an Independent Commissioner at the Bank, due to the following: a) 1(one) Independent Commissioner serves as chairman of the audit committee, namely on behalf of Rina Saadah b) 1(one) Independent Commissioner serves as Chairman of the Risk Monitoring Committee, namely on behalf of Eko B. Supriyanto c) 1(one) Independent Commissioner serves as Chairman of Remuneration and Nomination Committee, namely on behalf of Rama Notowidigdo
6.	Mayoritas Dewan Komisaris tidak saling memiliki hubungan keluarga sampai dengan derajat kedua dengan Anggota Direksi dan/atau sesama Dewan Komisaris. The majority of the Board of Commissioners do not have family relationships up to the second degree with members of the Board of Directors and/or fellow members of the Board of Commissioners.	Ya, seluruh Komisaris tidak memiliki hubungan keluarga sampai dengan derajat kedua baik dengan sesama Komisaris maupun Direksi. Hal ini telah disampaikan dalam Surat Pernyataan oleh masing-masing anggota Dewan Komisaris terkait dengan pelaksanaan <i>fit and proper test</i> yang bersangkutan. Yes, all Commissioners do not have family relationships up to the second degree, both with fellow Commissioners and Directors. This has been conveyed in a Statement Letter by each member of the Board of Commissioners related to the implementation of the relevant fit and proper test.
7.	Dewan Komisaris telah memiliki pedoman dan tata tertib kerja termasuk pengaturan etika kerja, waktu kerja, dan rapat The Board of Commissioners already has guidelines and work procedures including work ethic arrangements, working hours, and meetings	Ya, Dewan Komisaris telah memiliki pedoman dan tata kerja termasuk di dalamnya pengaturan etika kerja yang tercantum dalam Surat Keputusan Dewan Komisaris No.Kpts.B.01/KOM /SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman dan Tata Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Yes, the Board of Commissioners already has guidelines and work procedures including the work ethic arrangement as stated in the Decree of the Board of Commissioners No.Kpts.B.01/KOM/ SKP/12/2021 dated December 29, 2021 concerning Guidelines and Work Procedures for the Board of Commissioners, Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee and Secretary to the Board of Commissioners.
8.	Seluruh Anggota Dewan Komisaris memiliki integritas, kompetensi, dan reputasi keuangan yang memadai. All members of the Board of Commissioners have integrity, competence, and adequate financial reputation.	Ya, seluruh anggota Dewan Komisaris memiliki integritas, kompetensi dan reputasi keuangan yang memadai. Hal ini dibuktikan dengan hasil lulus <i>fit and proper test</i> dari masing-masing anggota Dewan Komisaris dan tidak terdapatnya hasil pemeriksaan dari internal audit maupun eksternal audit serta pemberitaan media terkait dengan hal tersebut di atas sampai dengan posisi 31 Desember 2021. Yes, all members of the Board of Commissioners have integrity, competence and adequate financial reputation. This is evidenced by the results of passing the fit and proper test from each member of the Board of Commissioners and the absence of inspection results from internal and external audits as well as media reports related to the above as of December 31, 2021.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
9.	Komisaris Independen yang berasal dari mantan Anggota Direksi Bank atau mantan Pejabat Eksekutif Bank atau pihak yang memiliki hubungan dengan Bank yang dapat mempengaruhi kemampuan untuk bertindak independen, dan tidak melakukan fungsi pengawasan serta berasal dari Bank, telah menjalani masa tunggu (<i>cooling off</i>) paling singkat 1 (satu) tahun. Independent Commissioners who come from former members of the Bank's Board of Directors or former Executive Officers of the Bank or parties who have relationships with the Bank that may affect the ability to act independently, and do not perform supervisory functions and are from the Bank, have undergone a cooling off period of at least 1 (one year).	Tidak ada anggota Komisaris Independen yang berasal dari pejabat Eksekutif Bank, tetapi berdasarkan rekomendasi dari KRN (Komite Remunerasi Dan Nominasi), pada tanggal 5 April 2021, serta Pendidikan dan pengalaman yang memadai, yang bersangkutan dapat menjabat sebagai Komisari Independen There is no member of the Independent Commissioner who comes from the Bank's Executive officers, but based on the recommendation from KRN (Remuneration and Nomination Committee), on April 5, 2021, as well as adequate education and experience, the person concerned can serve as Independent Commissioner
10.	Komisaris Independen yang berasal dari Komisaris Non Independen telah memenuhi persyaratan sebagai Komisaris Independen, telah menjalani masa tunggu (<i>cooling off</i>) paling singkat selama 6 (enam) bulan, dan telah memperoleh persetujuan Otoritas Jasa Keuangan. Independent Commissioners who come from Non-Independent Commissioners have met the requirements as Independent Commissioners, have undergone a cooling off period of at least 6 (six) months, and have obtained the approval of the Financial Services Authority.	Tidak ada Komisaris Independen yang berasal dari Komisaris Non-Independen. There are no Independent Commissioners who come from Non-Independent Commissioners.
11.	Komisaris Independen yang diangkat kembali setelah menjabat selama 2 (dua) periode masa jabatan berturut-turut telah ditetapkan dalam rapat Dewan Komisaris bahwa yang bersangkutan tetap dapat bertindak independen, dan Komisaris Independen yang bersangkutan telah menyatakan mengenai independensinya dalam RUPS. The Independent Commissioner who is reappointed after serving for 2 (two) consecutive terms has been determined at the meeting of the Board of Commissioners that he is still able to act independently, and the Independent Commissioner concerned has stated his independence in the RUPS.	Tidak ada Komisaris Independen yang diangkat kembali setelah menjabat selama 2 (dua) periode masa jabatan berturut-turut. There is no Independent Commissioner who has been reappointed after serving for 2 (two) consecutive terms of office.
12.	Seluruh Komisaris Independen tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan hubungan keluarga dengan anggota Dewan Komisaris lainnya, Anggota Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan untuk bertindak Independen. All Independent Commissioners have no financial relationship, management relationship, ownership relationship, and family relationship with other members of the Board of Commissioners, members of the Board of Directors and/or Controlling Shareholders or relationship with the Bank, which may affect the ability to act independently.	Ya, seluruh Komisaris Independen tidak ada yang memiliki hubungan keuangan, kepengurusan, kepemilikan dan hubungan keluarga dengan Anggota Dewan Komisaris lainnya, Anggota Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuannya untuk bertindak Independen. Yes, none of the Independent Commissioners have financial, management, ownership and family relationships with other Members of the Board of Commissioners, Members of the Board of Directors and/or Controlling Shareholders or relationship with the Bank, which may affect their ability to act independently.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
13.	Seluruh Anggota Dewan Komisaris telah lulus penilaian kemampuan dan kepatutan dan telah memperoleh surat persetujuan dari Otoritas Jasa Keuangan. All members of the Board of Commissioners have passed the fit and proper test and have obtained a letter of approval from the Financial Services Authority.	seluruh Anggota Dewan Komisaris telah lulus penilaian kemampuan dan kepatutan (<i>fit & proper test</i>) dan telah mendapat memperoleh surat persetujuan Otoritas Jasa Keuangan. All members of the Board of Commissioners have passed the fit & proper test and have obtained a letter of approval from the Financial Services Authority.
14.	Anggota Dewan Komisaris memiliki kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawab serta mampu mengimplementasikan kompetensi yang dimiliki dalam pelaksanaan tugas dan tanggung jawabnya. Members of the Board of Commissioners have adequate and relevant competencies to carry out their duties and responsibilities and are able to implement their competencies in carrying out their duties and responsibilities.	Ya, Anggota Dewan Komisaris memiliki kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawabnya serta mampu mengimplementasikan kompetensi yang dimilikinya dalam pelaksanaan tugas dan tanggung jawabnya. Hal ini dibuktikan dari hasil lulus <i>fit an proper test</i> dari masing-masing Anggota Dewan Komisaris dan tidak adanya hasil pemeriksaan dari internal audit maupun eksternal audit maupun hasil pengawasan yang dilakukan oleh Regulator dan Pemegang Saham Pengendali terkait dengan ketidakmampuan masing-masing yang bersangkutan dalam menjalankan tugas dan tanggung jawabnya sampai dengan posisi 31 Desember 2021. Yes, members of the Board of Commissioners have adequate and relevant competencies to carry out their duties and responsibilities and are able to implement their competencies in carrying out their duties and responsibilities. This is evidenced from the results of passing the fit and proper test from each Member of the Board of Commissioners and the absence of results from internal audits and external audits as well as the results of supervision carried out by the Regulator and Controlling Shareholders related to the inability of each of them in carrying out their duties. and responsibilities until December 31, 2021.
15.	Anggota Dewan Komisaris memiliki kemauan dan kemampuan untuk melakukan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawabnya. Members of the Board of Commissioners have the will and ability to carry out continuous learning in order to increase knowledge about banking and the latest developments related to finance or other fields that support the implementation of their duties and responsibilities.	Ya, Anggota Dewan Komisaris memiliki kemauan dan kemampuan untuk melakukan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan/lainnya yang mendukung pelaksanaan tugas dan tanggung jawabnya. Hal ini dibuktikan dengan beberapa pelatihan yang telah diikuti oleh masing-masing Anggota Dewan Komisaris sampai dengan 31 Desember 2021. Yes, members of the Board of Commissioners have the willingness and ability to carry out continuous learning in order to increase knowledge about banking and the latest developments related to finance/other fields that support the implementation of their duties and responsibilities. This is evidenced by several trainings that have been attended by each Member of the Board of Commissioners until December 31, 2021.
16.	Komposisi Dewan Komisaris tidak memenuhi ketentuan karena adanya intervensi Pemilik. The composition of the Board of Commissioners does not meet the requirements due to the owner's intervention.	Komposisi Dewan Komisaris telah memenuhi ketentuan yang berlaku, dimana terdapat 5 (lima) orang Dewan Komisaris yang terdiri dari 3 (tiga) orang Komisaris Independen dan 2 (dua) orang Komisaris, dimana salah satunya merupakan Komisaris Utama. The composition of the Board of Commissioners has complied with applicable regulations, where there are 5 (five) members of the Board of Commissioners consisting of 3 (three) Independent Commissioners and 2 (two) Commissioners, one of which is the President Commissioner.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
B. Governance Process		
1.	Penggantian dan/atau pengangkatan Anggota Dewan Komisaris telah memperhatikan Rekomendasi Komite Nominasi atau Komite Remunerasi dan Nominasi serta memperoleh persetujuan dari RUPS.	Ya, penggantian dan/atau pengangkatan Anggota Dewan Komisaris telah memperhatikan rekomendasi dari Komite Remunerasi seperti tertuang dalam risalah rapat Komite Remunerasi dan Nominasi tanggal 5 April 2021 dengan agenda rapat Perubahan Pengurus Bank dan telah memperoleh persetujuan dalam RUPS Tahunan tanggal 9 April 2021 yang dituangkan dalam Akta Pernyataan Keputusan Rapat No. 14 tanggal 19 April 2021 dibuat dihadapan M. Nova Faisal, SH. M.Kn., Notaris di Jakarta
	The replacement and/or appointment of members of the Board of Commissioners has taken into account the recommendations of the Nomination Committee or the Remuneration and Nomination Committee and obtained approval from the GMS.	Yes, the replacement and/or appointment of Members of the Board of Commissioners has taken into account the recommendations from the Remuneration Committee as stated in the minutes of the Remuneration and Nomination Committee meeting on April 5, 2021 with the agenda for the Change of Bank Management meeting and has obtained approval at the Annual GMS on April 9, 2021 which is stated in the Deed Statement of Meeting Resolutions No. 14 dated April 19, 2021, made before M. Nova Faisal, SH. M.Kn., Notary in Jakarta
2.	Dewan Komisaris telah melaksanakan tugas untuk memastikan terselenggaranya penerapan prinsip Tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi.	Ya, Dewan Komisaris telah melaksanakan tugasnya untuk memastikan terselenggaranya pelaksanaan prinsip-prinsip Tata Kelola yang Baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi. Kepastian terselenggaranya pelaksanaan prinsip-prinsip Tata Kelola yang Baik tertuang dalam notulen rapat Direksi dan Komisaris (Radirkom) setiap bulannya dan Rapat Dewan Komisaris serta Rapat Dewan Komisaris dengan Divisi atau Desk.
	The Board of Commissioners has carried out its duties to ensure the implementation of Good Governance principles in every business activity of the Bank at all levels or levels of the organization.	Yes, the Board of Commissioners has carried out its duties to ensure the implementation of Good Governance principles in every business activity of the Bank at all levels or levels of the organization. The certainty of the implementation of the principles of Good Governance is contained in the minutes of the monthly Board of Directors and Commissioners (Radirkom) meetings and Board of Commissioners' Meetings and Board of Commissioners' Meetings with Divisions or Desks.
3.	Dewan Komisaris telah melaksanakan pengawasan terhadap pelaksanaan tugas dan tanggung jawab Direksi secara berkala maupun sewaktu-waktu serta memberikan nasihat kepada Direksi.	Ya, Dewan Komisaris telah melaksanakan pengawasan terhadap pelaksanaan tugas dan tanggung jawab Direksi secara berkala maupun sewaktu-waktu, serta memberikan nasihat kepada Direksi yang pelaksanaannya dilakukan secara rutin minimal 1(satu) kali dalam sebulan melalui forum Rapat Direksi dan Dewan Komisaris (Radirkom).
	The Board of Commissioners has carried out supervision on the implementation of the duties and responsibilities of the Board of Directors on a regular basis or from time to time as well as providing advice to the Board of Directors.	Yes, the Board of Commissioners has carried out supervision of the implementation of the duties and responsibilities of the Board of Directors on a regular basis or at any time, as well as providing advice to the Board of Directors whose implementation is carried out routinely at least 1(one) time a month through the Board of Directors and Board of Commissioners Meeting forum (Radirkom).
4.	Dalam rangka melakukan tugas pengawasan, Dewan Komisaris telah mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank.	Ya, Dewan Komisaris telah mengarahkan, memantau dan mengevaluasi pelaksanaan kebijakan strategis Bank, antara lain melalui rapat bersama Direksi setiap bulan dan dituangkan dalam notulen Rapat Direksi dan Dewan Komisaris sebagaimana telah diuraikan di atas.
	In order to carry out its supervisory duties, the Board of Commissioners has directed, monitored, and evaluated the implementation of the Bank's strategic policies.	Yes, the Board of Commissioners has directed, monitored and evaluated the implementation of the Bank's strategic policies, including through monthly joint meetings with the Board of Directors and stated in the minutes of the Board of Directors and Board of Commissioners Meetings as described above.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
5.	Dewan Komisaris tidak terlibat dalam pengambilan keputusan kegiatan operasional Bank, kecuali dalam hal penyediaan dana kepada pihak terkait dan hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank dan/atau peraturan perundangan dalam rangka melaksanakan fungsi pengawasan. The Board of Commissioners is not involved in making decisions on the Bank's operational activities, except in terms of providing funds to related parties and other matters stipulated in the Bank's Articles of Association and/or laws and regulations in order to carry out the supervisory function.	Ya, Dewan Komisaris tidak terlibat dalam pengambilan keputusan kegiatan operasional Bank, kecuali dalam hal penyediaan dana kepada pihak terkait dan hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank dan/atau peraturan perundangan yang berlaku dalam rangka melaksanakan fungsi pengawasan. Persetujuan dalam hal penyediaan dana kepada pihak terkait, antara lain diberikan kepada Debitur yang merupakan pihak terkait Bank. Hal ini telah diatur di dalam Surat Edaran Direksi No.SE.B.37/Dir.01.03/ADK/06/2020 Tanggal 12 Juni 2020 Perihal Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar Yes, the Board of Commissioners is not involved in making decisions on the Bank's operational activities, except in terms of providing funds to related parties and other matters stipulated in the Bank's Articles of Association and/or applicable laws and regulations in order to carry out the supervisory function. Approval in terms of providing funds to related parties, among others, is given to Debtors who are related parties to the Bank. This has been regulated in the Circular Letter of the Board of Directors No.SE.B.37/Dir.01.03/ADK/06/2020 dated June 12, 2020 regarding the Maximum Limit for Loans and Provision of Large Funds
6.	Dewan Komisaris telah memastikan bahwa Direksi telah menindaklanjuti Temuan Audit dan Rekomendasi dari SKAI Bank, Auditor Eksternal, hasil Pengawasan Otoritas Jasa Keuangan dan/atau hasil Pengawasan Otoritas lainnya	Ya, Dewan Komisaris telah memastikan bahwa Direksi telah menindaklanjuti Temuan Audit dan Rekomendasi dari Satuan Kerja Audit Intern (SKAI) Bank, Auditor Eksternal, hasil Pengawasan Otoritas Jasa Keuangan dan/atau hasil Pengawasan Otoritas lainnya. Kepastian atas tindak lanjut Direksi terhadap Auditor, antara lain tertuang dalam : - Surat Bank kepada OJK No.R.194/SKAI/SKL/06/2021 tanggal 30 Juni 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) posisi 30 April 2018 & posisi 31 Januari 2020 - Surat Bank kepada OJK No.R.216/SKAI/SKL/07/2021 tanggal 29 Juli 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) posisi 30 April 2018 & posisi 31 Januari 2020 - Surat Bank kepada OJK No.R.217/SKAI/SKL/08/2021 tanggal 31 Agustus 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) posisi 30 April 2018 & posisi 31 Januari 2020 - Surat Bank kepada OJK No.R.280/SKAI/SKL//10/2021 tanggal 29 Oktober 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) Posisi 30 April 2018 & Posisi 31 Januari 2020 - Surat kepada OJK No.R.315/SKAI/SKL/12/2021 tanggal 30 Desember 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Raya Indonesia, Tbk. Posisi 30 April 2018 & Posisi 31 Januari 2020 - Surat kepada OJK No.R.217/SKAI/SKL/12/2021 tanggal 31 Desember 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) Posisi 30 April & Posisi 31 Januari 2020.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
	The Board of Commissioners has ensured that the Board of Directors has followed up on the Audit Findings and Recommendations from the Bank's SKAI, External Auditor, the results of the Supervision of the Financial Services Authority and/or the results of the Supervision of other Authorities.	Yes, the Board of Commissioners has ensured that the Board of Directors has followed up on the Audit Findings and Recommendations from the Bank's Internal Audit Unit (SKAI), External Auditors, the results of the Supervision of the Financial Services Authority and/or the results of the Supervision of other Authorities. Certainty on the follow-up of the Board of Directors to the Auditor, among others, is contained in: a. Bank Letter to OJK No.R.194/SKAI/SKL/06/2021 dated June 30, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (has changed its name became PT Bank Raya Indonesia, Tbk.) position April 30, 2018 & January 31, 2020 position b. Bank Letter to OJK No.R.216/SKAI/SKL/07/2021 dated July 29, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (has changed its name to PT Bank Raya Indonesia, Tbk.) position April 30, 2018 & January 31, 2020 position c. Bank Letter to OJK No.R.217/SKAI/SKL/08/2021 dated August 31, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (has changed its name became PT Bank Raya Indonesia, Tbk.) position April 30, 2018 & January 31, 2020 position d. Bank Letter to OJK No.R.280/SKAI/SKL//10/2021 dated October 29, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (has changed name to PT Bank Raya Indonesia, Tbk.) Position April 30, 2018 & Position January 31, 2020 e. Letter to OJK No.R.315/SKAI/SKL/12/2021 dated December 30, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Raya Indonesia, Tbk. Position 30 April 2018 & Position 31 January 2020 f. Letter to OJK No.R.217/SKAI/SKL/12/2021 dated December 31, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Indonesia Agroniaga, Tbk (has changed its name to PT Bank Raya Indonesia, Tbk.) Position April 30 & Position January 31, 2020.
7.	Dewan Komisaris memberitahukan kepada Otoritas Jasa Keuangan paling lama 7 (tujuh) hari kerja sejak ditemukan pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan, serta keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank. The Board of Commissioners shall notify the Financial Services Authority no later than 7 (seven) working days from the discovery of violations of laws and regulations in finance and banking, as well as conditions or estimates of conditions that may endanger the continuity of the Bank's business.	Tidak terdapat pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan, serta keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank. There are no violations of laws and regulations in the field of finance and banking, as well as conditions or estimates of conditions that may endanger the continuity of the Bank's business.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
8.	Dewan Komisaris telah melaksanakan tugas dan tanggung jawab secara independen. The Board of Commissioners has carried out its duties and responsibilities independently.	Ya, Dewan Komisaris telah melaksanakan tugas dan tanggung jawab secara independen. Hal ini tercantum dalam Pedoman dan Tata Kerja Dewan Komisaris berdasarkan Surat Keputusan Dewan Komisaris No.Kpts.B.01/KOM/SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman dan Tata Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Kriteria independensi Dewan Komisaris tercantum dalam butir IV. Etika Kerja. Yes, the Board of Commissioners has carried out its duties and responsibilities independently. This is stated in the Guidelines and Work Procedures of the Board of Commissioners based on the Decree of the Board of Commissioners No.Kpts.B.01/KOM/SKP/12/2021 dated December 29, 2021 concerning Guidelines and Work Procedures for the Board of Commissioners, Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee and Secretary to the Board of Commissioners. The criteria for the independence of the Board of Commissioners are listed in point IV. Work Ethics.
9.	Dewan Komisaris telah membentuk Komite Audit, Komite Pemantau risiko, serta Komite Remunerasi dan Nominasi. The Board of Commissioners has established an Audit Committee, a Risk Monitoring Committee, and a Remuneration and Nomination Committee.	Ya, Dewan Komisaris telah membentuk komite-komite yang meliputi Komite Audit, Komite Pemantau Risiko serta Komite Remunerasi dan Nominasi Yes, the Board of Commissioners has established committees which include the Audit Committee, Risk Monitoring Committee and Remuneration and Nomination Committee
10.	Pengangkatan Anggota Komite-Komite telah dilakukan Direksi berdasarkan keputusan rapat Dewan Komisaris. The appointment of members of the Committees has been carried out by the Board of Directors based on the decision of the meeting of the Board of Commissioners.	Ya, perubahan anggota-anggota Komite telah dilakukan Direksi berdasarkan keputusan rapat Dewan Komisaris sesuai Surat Dewan Komisaris No.R.62/DK-IV/2021 tanggal 28 April 2021 perihal Perubahan Susunan Anggota Komite Dewan Komisaris BRI Agro (telah berganti nama menjadi Bank Raya) dan Surat Dewan Komisaris No. R.149/DK-X/2021 tanggal 11 Oktober 2021 perihal Reposisi Anggota Komite Pemantau Risiko BRI Agro.(telah berganti menjadi BANK RAYA) Yes, the changes to the Committee members have been made by the Board of Directors based on the decision of the Board of Commissioners meeting in accordance with the Board of Commissioners Letter No.R.62/DK-IV/2021 dated April 28, 2021 regarding Changes in the Composition of the Committee Members of the BRI Agro Board of Commissioners (has changed its name to Bank Raya) and Letter of the Board of Commissioners No. R.149/DK-X/2021 dated October 11, 2021 regarding Reposition of BRI Agro Risk Monitoring Committee Members. (has changed to BANK RAYA)
11.	Dewan Komisaris telah memastikan bahwa komite yang dibentuk telah menjalankan tugasnya secara efektif. The Board of Commissioners has ensured that the committees formed have carried out their duties effectively.	Ya, Dewan Komisaris telah memastikan bahwa komite yang dibentuk telah menjalankan tugasnya secara efektif melalui rapat-rapat dan laporan Komite Yes, the Board of Commissioners has ensured that the committees formed have carried out their duties effectively through Committee meetings and reports
12.	Dewan Komisaris telah menyediakan waktu yang cukup untuk melaksanakan tugas dan tanggung jawab secara optimal.	Ya, Dewan Komisaris telah menyediakan waktu yang cukup untuk melaksanakan tugas dan tanggung jawabnya secara optimal. Hal ini dibuktikan dalam daftar kehadiran dan notulen rapat Dewan Komisaris dan rapat Dewan Komisaris dengan Direksi, dimana kehadiran Dewan Komisaris melebihi dari minimal yang telah ditetapkan dalam Peraturan OJK dan Pedoman Tata Kelola internal.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
	The Board of Commissioners has provided sufficient time to carry out its duties and responsibilities optimally.	Yes, the Board of Commissioners has provided sufficient time to carry out its duties and responsibilities optimally. This is evidenced in the attendance list and the minutes of the Board of Commissioners' meeting and the Board of Commissioners' meeting with the Board of Directors, where the attendance of the Board of Commissioners exceeds the minimum stipulated in OJK Regulations and Internal Governance Guidelines.
13.	Rapat Dewan Komisaris membahas permasalahan sesuai dengan agenda rapat dan diselenggarakan secara berkala, paling sedikit 4 (empat) kali dalam 1 (satu) tahun, serta dihadiri secara fisik paling sedikit 2 (dua) kali dalam 1 (satu) tahun, atau melalui teknologi telekonferensi bagi Komisaris Non Independen dalam hal Komisaris Non Independen tidak dapat menghadiri rapat secara fisik. Meetings of the Board of Commissioners discuss issues according to the meeting agenda and are held regularly, at least 4 (four) times in 1 (one) year, and physically attended at least 2 (two) times in 1 (one) year, or through teleconferencing technology, for Non-Independent Commissioners in the event that the Non-Independent Commissioners are unable to physically attend the meeting.	Rapat Dewan Komisaris telah membahas permasalahan sesuai dengan agenda rapat dan diselenggarakan secara berkala, paling sedikit 4 (empat) kali dalam 1 (satu) tahun. Meetings of the Board of Commissioners have discussed issues according to the meeting agenda and are held regularly, at least 4 (four) times in 1 (one) year.
14.	Pengambilan keputusan rapat Dewan Komisaris telah dilakukan berdasarkan musyawarah untuk mufakat atau suara terbanyak dalam hal tidak terjadi musyawarah untuk mufakat. Decisions on the Board of Commissioners meeting have been made based on deliberation for consensus or a majority vote in the event that deliberation for consensus does not occur.	Ya, pengambilan keputusan rapat Dewan Komisaris telah dilakukan berdasarkan musyawarah mufakat. Hal ini tercermin dalam notulen rapat Dewan Komisaris sebagaimana telah diuraikan di atas. Yes, the decision-making for the Board of Commissioners meeting has been made based on deliberation and consensus. This is reflected in the minutes of the Board of Commissioners' meeting as described above.
15.	Anggota Dewan Komisaris tidak memanfaatkan Bank untuk kepentingan pribadi, keluarga, dan/atau Pihak lain yang dapat merugikan atau mengurangi keuntungan Bank. Members of the Board of Commissioners do not take advantage of the Bank for personal, family, and/or other parties' interests that may harm or reduce the Bank's profits.	Ya, pengambilan keputusan rapat Dewan Komisaris telah dilakukan berdasarkan musyawarah mufakat. Hal ini tercermin dalam notulen rapat Dewan Komisaris sebagaimana telah diuraikan di atas. Yes, the decision-making for the Board of Commissioners meeting has been made based on deliberation and consensus. This is reflected in the minutes of the Board of Commissioners' meeting as described above.
16.	Anggota Dewan Komisaris tidak mengambil dan/atau menerima keuntungan pribadi dari Bank selain Remunerasi dan fasilitas lain yang ditetapkan RUPS. Members of the Board of Commissioners do not take and/or receive personal benefits from the Bank other than the remuneration and other facilities determined by the GMS.	Ya, Anggota Dewan Komisaris tidak mengambil dan/atau menerima keuntungan pribadi dari Bank selain remunerasi dan fasilitas lainnya yang ditetapkan RUPS. Hal ini terbukti sampai dengan 31 Desember 2021 tidak terdapat hasil audit dari internal maupun eksternal terkait dengan hal tersebut di atas. Yes, Members of the Board of Commissioners do not take and/or receive for personal gain from the Bank other than remuneration and other facilities determined by the GMS. This is proven that until December 31, 2021, there are no internal or external audit results related to the above.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis									
17.	Pemilik melakukan intervensi terhadap pelaksanaan tugas Dewan Komisaris yang menyebabkan kegiatan operasional Bank terganggu sehingga berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank. The owner intervenes in the implementation of the duties of the Board of Commissioners which causes the Bank's operational activities to be disrupted so that it has an impact on reducing the Bank's profits and/or causing the Bank's losses.	Pemilik tidak melakukan intervensi terhadap pelaksanaan tugas Dewan Komisaris yang menyebabkan kegiatan operasional Bank menjadi terganggu sehingga berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank. The owner does not intervene in the implementation of the duties of the Board of Commissioners which causes the Bank's operational activities to be disrupted so that it has an impact on reducing the Bank's profits and/or causing the Bank's losses.									
C. Governance Outcome											
1.	Hasil rapat Dewan Komisaris telah dituangkan dalam Risalah rapat dan didokumentasikan dengan baik, termasuk perbedaan pendapat (<i>dissenting opinions</i>) yang terjadi secara jelas. The results of the Board of Commissioners meeting have been stated in the Minutes of Meeting and are well documented, including clear dissenting opinions.	Ya, hasil rapat Dewan Komisaris telah dituangkan ke dalam Risalah rapat dan didokumentasikan dengan baik sebagaimana telah diuraikan di atas, dan saat ini belum terdapat adanya perbedaan pendapat (<i>dissenting opinions</i>). Yes, the results of the Board of Commissioners meeting have been recorded in the Minutes of Meeting and are well documented as described above, and currently there are no dissenting opinions.									
2.	Hasil rapat Dewan Komisaris telah dibagikan kepada seluruh Anggota Dewan Komisaris dan Pihak yang terkait. The results of the Board of Commissioners meeting have been distributed to all members of the Board of Commissioners and related parties.	Ya, hasil rapat Dewan Komisaris telah dibagikan kepada seluruh Anggota Dewan Komisaris dengan tanda terima dari masing-masing anggota Dewan Komisaris sebagai tanda buktinya. Yes, the results of the Board of Commissioners meeting have been distributed to all members of the Board of Commissioners with a receipt from each member of the Board of Commissioners as proof.									
3.	Hasil rapat Dewan Komisaris merupakan Rekomendasi dan/atau arahan yang dapat diimplementasikan oleh RUPS dan/atau Direksi. The results of the Board of Commissioners meeting are recommendations and/or directions that can be implemented by the GMS and/or the Board of Directors.	Ya, hasil rapat Dewan Komisaris sebagaimana telah diuraikan di atas merupakan rekomendasi dan/atau arahan yang dapat diimplementasikan oleh RUPS dan/atau Direksi. Yes, the results of the Board of Commissioners meeting as described above are recommendations and/or directions that can be implemented by the GMS and/or the Board of Directors.									
4.	Dalam laporan pelaksanaan Tata Kelola, Anggota Dewan Komisaris paling sedikit telah mengungkapkan: a) Kepemilikan Saham yang mencapai 5% (lima persen) atau lebih pada Bank dan Perusahaan lain yang berkedudukan di dalam dan di luar negeri; b) Hubungan keuangan dan hubungan keluarga dengan Anggota Direksi, Anggota Dewan Komisaris lain, dan/atau Pemegang Saham Bank; c) Remunerasi dan fasilitas lain; d) Opsi Saham (<i>share option</i>) yang dimiliki Dewan Komisaris.	Ya, dalam laporan pelaksanaan Tata Kelola Dewan Komisaris telah mengungkapkan : a) Dewan Komisaris hingga tanggal 31 Desember 2021 memiliki Jumlah Lembar Saham yang mencapai kurang dari 5 % <table border="1"> <thead> <tr> <th>No.</th><th>Dewan Komisaris</th><th>Persentase</th></tr> </thead> <tbody> <tr> <td>1.</td><td>Budi Satria</td><td>0,00594%</td></tr> <tr> <td>2.</td><td>Achmad F.C Barir</td><td>0,00534%</td></tr> </tbody> </table> b) Hubungan keuangan dan hubungan keluarga dengan Anggota Dewan Komisaris lainnya, Anggota Direksi dan/atau Pemegang Saham Pengendali Bank. Hal ini sesuai dengan surat pernyataan yang dibuat oleh Komisaris bahwa tidak terkait hubungan keluarga sampai derajat kedua dengan Direksi dan Anggota Dewan Komisaris lainnya. c) Remunerasi dan fasilitas lain yang didapatkan sebagaimana telah diuraikan di dalam hasil keputusan Rapat Komite Remunerasi dan Nominasi yang dituangkan dalam Surat Bank BRI No.1860_DIR/HCS/11/2021 tanggal 12 November 2020 tentang Remunerasi dan Benefit Pengurus Bank BRI AGRO (telah berganti nama menjadi BANK RAYA)	No.	Dewan Komisaris	Persentase	1.	Budi Satria	0,00594%	2.	Achmad F.C Barir	0,00534%
No.	Dewan Komisaris	Persentase									
1.	Budi Satria	0,00594%									
2.	Achmad F.C Barir	0,00534%									

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis																													
		d) Terdapat alokasi <i>shares option</i> untuk Pengurus Bank sesuai dengan SK No.SE : B.25A/Dir.01.02/SKP/12/2018 tentang ketentuan MESOP untuk Direksi dan Komisaris dengan ketentuan sebagai berikut : <table><tr><th>Periode</th><th>Target Periode</th><th>% dari jumlah total saham yang dibagi</th><th>Jumlah saham (Lembar)</th></tr><tr><td>Tahap I</td><td>10 Desember 2018</td><td>50%</td><td>52.500.000</td></tr><tr><td>Tahap II</td><td>1 April 2019</td><td>30%</td><td>31.500000</td></tr><tr><td>Tahap III</td><td>1 April 2020</td><td>20%</td><td>21000000</td></tr><tr><td>Total</td><td></td><td>100%</td><td>105.000000</td></tr></table>	Periode	Target Periode	% dari jumlah total saham yang dibagi	Jumlah saham (Lembar)	Tahap I	10 Desember 2018	50%	52.500.000	Tahap II	1 April 2019	30%	31.500000	Tahap III	1 April 2020	20%	21000000	Total		100%	105.000000									
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	In the report on the implementation of Governance, Members of the Board of Commissioners have at least disclosed: a) Share ownership that reaches 5% (five percent) or more in Banks and other Companies domiciled at home and abroad; b) Financial relationship and family relationship with Members of the Board of Directors, other Members of the Board of Commissioners, and/or Shareholders of the Bank; c) Remuneration and other facilities; d) Share options (share options) owned by the Board of Commissioners.	Yes, in the report on the implementation of Good Corporate Governance, the Board of Commissioners has disclosed: a) The Board of Commissioners as of December 31, 2021 has a number of shares of less than 5% <table><tr><th>No</th><th>Board of Commissioners</th><th>Percentage</th></tr><tr><td>1</td><td>Budi Satria</td><td>0,00594%</td></tr><tr><td>2</td><td>Achmad F.C Barir</td><td>0,00534%</td></tr></table> b) Financial relationship and family relationship with other Members of the Board of Commissioners, Members of the Board of Directors and/or Controlling Shareholders of the Bank. This is in accordance with the statement made by the Commissioner that it is not related to family relations to the second degree with the Board of Directors and other members of the Board of Commissioners. c) Remuneration and other facilities obtained as described in the resolutions of the Remuneration and Nomination Committee Meeting as outlined in Bank BRI Letter No.1860_DIR/HCS/11/2021 dated November 12, 2020 concerning Remuneration and Benefits for Bank BRI AGRO Management (has changed its name to GREAT BANK) d) There is an allocation of shares option for Bank Management in accordance with SK No. SE : B.25A/Dir.01.02/SKP/12/2018 concerning MESOP provisions for Directors and Commissioners with the following provisions: <table><tr><th>Period</th><th>Target Period</th><th>% of the total number of shares divided</th><th>Number of shares (sheet)</th></tr><tr><td>Stage I</td><td>10 December 2018</td><td>50%</td><td>52,500,000</td></tr><tr><td>Stage II</td><td>April 1, 2019</td><td>20%</td><td>31.500000</td></tr><tr><td>Stage III</td><td>April 1, 2020</td><td>100%</td><td>21000000</td></tr><tr><td>Total</td><td></td><td>100%</td><td>105.000000</td></tr></table>	No	Board of Commissioners	Percentage	1	Budi Satria	0,00594%	2	Achmad F.C Barir	0,00534%	Period	Target Period	% of the total number of shares divided	Number of shares (sheet)	Stage I	10 December 2018	50%	52,500,000	Stage II	April 1, 2019	20%	31.500000	Stage III	April 1, 2020	100%	21000000	Total		100%	105.000000
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No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
5.	Peningkatan pengetahuan, keahlian, dan kemampuan Anggota Dewan Komisaris dalam pengawasan Bank yang ditunjukkan antara lain dengan peningkatan kinerja Bank, penyelesaian permasalahan yang dihadapi Bank, dan pencapaian hasil sesuai ekspektasi Pemangku Kepentingan. Peningkatan budaya pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawab Anggota Dewan Komisaris. Increased knowledge, expertise, and ability of the members of the Board of Commissioners in supervising the Bank, which is shown, among others, by improving the performance of the Bank, solving problems faced by the Bank, and achieving results in accordance with the expectations of the Stakeholders. Continuous improvement of learning culture in order to increase knowledge about banking and the latest developments related to finance or other fields that support the implementation of duties and responsibilities of members of the Board of Commissioners.	Anggota Dewan Komisaris telah meningkatkan pengetahuan dan keahlian serta budaya pembelajaran secara berkelanjutan dalam rangka untuk meningkatkan pengawasan Bank dan mendukung pelaksanaan tugas serta tanggung jawab sebagai Anggota Dewan Komisaris, seperti webinar Digital Risk Leadership : <i>Orchestrating Business & Boardroom in Mitigating Risk, Refreshment Bank Executive Overview</i>, dan webinar <i>Global Culture Survey 2021: The link between culture and competitive advantage</i>. Members of the Board of Commissioners have increased their knowledge and skills as well as a culture of continuous learning in order to improve supervision of the Bank and support the implementation of duties and responsibilities as members of the Board of Commissioners, such as webinars on Digital Risk Leadership: <i>Orchestrating Business & Boardroom in Mitigating Risk, Refreshment Bank Executive Overview</i>, and the 2021 Global Culture Survey webinar: <i>The link between culture and competitive advantage</i>.
6.	Kegiatan operasional Bank terganggu dan/atau memberikan keuntungan yang tidak wajar kepada Pemilik yang berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank, akibat intervensi Pemilik terhadap komposisi dan/atau pelaksanaan tugas Dewan Komisaris. The Bank's operational activities are disrupted and/or provide unreasonable profits to the Owners which have an impact on reducing the Bank's profits and/or causing losses to the Bank, due to the Owner's intervention on the composition and/or implementation of the duties of the Board of Commissioners.	Pemilik tidak melakukan intervensi terhadap komposisi dan/atau pelaksanaan tugas Dewan Komisaris yang mengakibatkan kegiatan operasional Bank terganggu dan/atau memberikan keuntungan yang tidak wajar kepada Pemilik yang berdampak kepada berkurangnya keuntungan Bank. The Owner does not intervene in the composition and/or implementation of the duties of the Board of Commissioners which results in the Bank's operational activities being disrupted and/or providing unreasonable profits to the Owner which results in a reduction in the Bank's profits.

Kriteria Evaluasi Kinerja Dewan Komisaris

Kriteria *Self-assessment* Dewan Komisaris terbagi menjadi 3 (tiga) kelompok yaitu *Governance Structure*, *Governance process* dan *Governance outcome*. *Governance Structure* terdiri dari 16 indikator, *Governance process* terdiri dari 17 indikator dan *governance outcome* terdiri dari 6 indikator.

Criteria for Evaluating the Performance of the Board of Commissioners

The self-assessment criteria for the Board of Commissioners are separated into three (three) categories, namely *Governance structure*, *Governance process*, and *Governance result*. The governance structure is comprised of sixteen indicators, the governance process is comprised of seventeen indicators, and the governance result is comprised of six indicators.

Komisaris Independen Independent Commissioner

Pada tahun 2021, Bank Raya memiliki 3 (tiga) orang Komisaris Independen dari 5 (lima) orang keseluruhan anggota Dewan Komisaris yang berarti telah memenuhi Peraturan OJK Nomor 55/POJK.03/2016 dan menyatakan bahwa Komisaris Independen yang dimiliki oleh Perseroan lebih dari 50% jumlah anggota Dewan Komisaris.

In 2021, Bank Raya will have three (three) Independent Commissioners out of 5 (five) members of the complete Board of Commissioners, demonstrating compliance with FSA Regulation 55/POJK.03/2016, which requires the Company to have more than 50 Independent Commissioners. % of the Board of Commissioners' overall membership.

Komisaris Independen adalah anggota Dewan Komisaris yang tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain dan/atau Pemegang Saham Pengendali, atau hubungan dengan Bank yang dapat mempengaruhi kemampuan yang bersangkutan untuk bertindak independen.

Independent Commissioners are members of the Board of Commissioners who have no financial, management, share ownership, or family ties to members of the Board of Directors, other members of the Board of Commissioners, or Controlling Shareholders, or to the Bank that could impair their ability to act independently.

Kriteria Penentuan Komisaris Independen Independent Commissioner Selection Criteria

Persyaratan diangkatnya anggota Dewan Komisaris Independen minimal sama dengan persyaratan untuk mengangkat anggota Dewan Komisaris non Independen ditambah dengan beberapa aturan lain dalam Peraturan OJK No. 33/POJK.04/2014 sebagaimana berikut ini:

The criteria for appointment of members of the Independent Board of Commissioners are identical to those for non-Independent members of the Board of Commissioners, plus numerous additional conditions set out in FSA Regulation No. 33/POJK.04/2014:

Kriteria Komisaris Independen Independent Commissioner Selection Criteria	Eko B. Supriyanto	Rina Saadah	Rama Notowidigdo
Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan emiten atau perusahaan publik tersebut dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen emiten atau perusahaan publik pada periode berikutnya.	√	√	√
S/he is not a person who has worked for or has the authority and responsibility for planning, leading, controlling, or supervising the issuer's or public company's activities in the preceding 6 (six) months, except for reappointment as Independent Commissioner of the issuer's or public company's activities in the subsequent six (six) months.			
Tidak mempunyai saham baik langsung maupun tidak langsung pada emiten atau perusahaan publik tersebut.	√	√	√
S/he does not hold shares in the issuer or public firm, either directly or indirectly			
Tidak mempunyai hubungan afiliasi dengan emiten atau perusahaan publik, anggota Dewan Komisaris, anggota Direksi, atau Pemegang Saham utama emiten atau perusahaan publik tersebut.	√	√	√
S/he has no connection to the issuer or public company, the members of the Board of Commissioners, the members of the Board of Directors, or the issuer or public company's significant shareholders.			
Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha emiten atau perusahaan publik tersebut.	√	√	√
S/he does not have a commercial connection with the issuer or public firm, either directly or indirectly.			

Pernyataan Tentang Independensi Masing-Masing Komisaris Independen Statement Regarding Each Independent Commissioner's Independence

Pernyataan independensi dari anggota Dewan Komisaris Independen menyatakan diri tidak memiliki hubungan afiliasi dengan pihak Perseroan untuk kemudian disampaikan kepada OJK. Berikut adalah bukti pernyataan Independensi Dewan Komisaris Independen Bank Raya.

The members of the Independent Board of Commissioners affirm their independence from the Company to be presented to the FSA. The following is evidence of the Independent Board of Commissioners of Bank Raya's declaration of independence.

SURAT PERNYATAAN INDEPENDENSI
PT. BANK RAKYAT INDONESIA AGRONIAGA Tbk

Saya yang bertandatangan di bawah ini:

Nama : Eko Budi Supriyanto
Pekerjaan : Karyawan Swasta
Tempat dan Tanggal Lahir : Blora, 16 Mei 1964
Alamat :

Dengan ini menyatakan bahwa saya :

1. Saya tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai pelaksanaan *Good Corporate Governance* (GCG) bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Jakarta, 19 April 2021

Eko Budi Supriyanto

SURAT PERNYATAAN INDEPENDENSI
PT. BANK RAKYAT INDONESIA AGRONIAGA Tbk

Saya yang bertandatangan di bawah ini:

Nama : Rama Gutama Notowidigdo

Pekerjaan : Karyawan Swasta

Tempat dan Tanggal Lahir : Jakarta, 11 April 1973

Alamat :

Dengan ini menyatakan bahwa saya :

1. Saya tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai pelaksanaan *Good Corporate Governance* (GCG) bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Jakarta, 15 April 2021



Rama Gutama Notowidigdo

SURAT PERNYATAAN INDEPENDENSI
PT. BANK RAKYAT INDONESIA AGRONIAGA Tbk

Saya yang bertandatangan di bawah ini:

Nama : Rina Sa'adah, LC, M.Si
Pekerjaan : Wiraswasta
Tempat dan Tanggal Lahir : Tasikmalaya, 02 Oktober 1990
Alamat :

Dengan ini menyatakan bahwa saya :

1. Saya tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan saya untuk bertindak independen sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan yang mengatur mengenai pelaksanaan *Good Corporate Governance* (GCG) bagi Bank Umum.
2. Apabila kemudian hari ditemukan bahwa saya memiliki hubungan sebagaimana dimaksud pada angka 1 maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

Demikian pernyataan independensi saya, yang telah saya buat dengan sebenar-benarnya.

Jakarta, 20 April 2021

Rina Sa'adah, LC, M.Si

Direksi Board of Directors

Direksi merupakan organ dalam tata kelola perusahaan yang memiliki tanggung jawab penuh atas pengelolaan Bank, sesuai dengan maksud dan tujuan Bank. Wewenang tersebut digunakan demi kepentingan dan pencapaian tujuan Bank. Hal ini sejalan dengan yang ditetapkan oleh regulasi bahwa Direksi dapat mewakili Bank, baik di dalam maupun di luar pengadilan sesuai dengan ketentuan anggaran dasar.

Masing-masing anggota Direksi melaksanakan tugas sesuai pembagian tugas dan wewenangnya. Tujuannya adalah demi mencapai efektivitas pengelolaan dan pencapaian hasil yang maksimal. Direksi Bank Raya senantiasa menjunjung tinggi sikap profesional, objektif, berpikiran strategis dan mengedepankan kepentingan Bank.

Dasar Hukum Legal Foundation

Dasar hukum keberadaan Direksi adalah sebagai berikut:

1. Undang-Undang No. 40 tahun 2007 tentang Perseroan Terbatas.
2. Peraturan OJK Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.
3. Peraturan OJK Nomor 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum.
4. Anggaran Dasar Perseroan

The Board of Directors is a corporate governance body that is solely responsible for the operation of the Bank in line with the Bank's stated goals and objectives. This power is utilised to further the Bank's interests and goals. This is consistent with regulation, which provides that the Board of Directors may represent the Bank both within and outside of the court, according to the restrictions of the Bank's articles of incorporation.

Each member of the Board of Directors carries out his or her responsibilities in accordance with the distribution of responsibilities and authority. The objective is to maximise management effectiveness and outcomes. Bank Raya's Board of Directors consistently maintains a professional, objective, strategic mindset and puts the Bank's interests first.

The Board of Directors' legal authorities are as follows:

1. Limited Liability Company Law No. 40 of 2007.
2. FSA Regulation No. 33/POJK.04/2014 on Issuers' or Public Companies' Boards of Directors and Boards of Commissioners.
3. FSA Regulation 55/POJK.03/2016 on the Application of Good Corporate Governance Principles to Commercial Banks.
4. Articles of Association of the Company.

Pedoman Kerja Direksi Board Manual

Bank Raya telah menyusun pedoman Kerja Direksi melalui Surat Keputusan Direksi No.Kpts.B.286/DIR.02.04/OJL/06/2021 tanggal 16 Juni 2021 yang berisikan tentang pedoman dan tata Kerja Direksi PT Bank Raya Indonesia Tbk yang berisikan antara lain:

1. Landasan hukum
2. Independensi Direktur Utama
3. Direksi
4. Direktur yang membawahi fungsi kepatuhan
5. Tugas dan wewenang direksi
6. Etika kerja
7. Waktu kerja
8. Pembagian tugas direksi
9. Rapat Direksi
10. Rapat Direksi dan Dewan Komisaris
11. Direksi Perseroan Lowong
12. Komite-komite direksi
13. Masa jabatan direksi
14. Larangan
15. Pelaksanaan tugas terkait RUPS dan aksi korporasi

Bank Raya has compiled the Board of Directors Work Guidelines pursuant to Board of Directors Decree No.Kpts.B.286/DIR.02.04/OJL/06/2021 dated June 16, 2021, which contains guidelines and procedures for the Board of Directors of PT Bank Raya Indonesia Tbk. These guidelines and procedures include, but are not limited to:

1. Legal foundation
2. President Director's Independence
3. Board of Directors
4. Director responsible for the compliance role
5. The Board of Directors' responsibilities and authorities
6. Professionalism
7. Working hours
8. Division of Duties of the Board of Directors
9. Meeting of the Board of Directors
10. Meeting of Board of Directors and Board of Commissioners
11. Vacant Board of Directors of the Company
12. Board of Directors' Committees
13. Board of Directors' terms of office
14. Restriction
15. Fulfilment of responsibilities relating to the GMS and corporate activities

Ketentuan Masa Jabatan Terms of Office

Selain ditentukan dalam RUPS, pedoman kerja Direksi juga menentukan masa jabatan Direksi yang diangkat untuk jangka waktu 3 (tiga) tahun sejak penutupan RUPS sewaktu diangkat, dan apabila ada anggota Direksi yang masa jabatannya telah berakhir dapat diangkat kembali sesuai dengan Anggaran Dasar Perseroan.

Along with being specified in the GMS, the Board of Directors' work guidelines also specify the term of office of the Board of Directors, who are appointed for a period of three (three) years from the date of the GMS's close, and may be reappointed in accordance with the Company's Articles of Association.

Mekanisme Pengunduran Diri dan Pemberhentian Direksi The Board of Directors' Resignation and Dismissal Procedures

Pemberhentian keanggotaan Direksi dapat dilakukan sewaktu-waktu oleh RUPS yang dihadiri oleh Pemegang Saham pengendali apabila anggota Direksi dianggap tidak memenuhi persyaratan dengan adanya bukti yang sah dan memperhatikan peraturan perundang-undangan yang berlaku.

Dismissal of a member of the Board of Directors may be carried out at any time by the GMS attended by the controlling Shareholder if it is determined that the member does not satisfy the criteria based on solid evidence and in accordance with existing rules and regulations.

Alasan pemberhentian anggota Direksi antara lain:

1. Tidak/kurang dapat memenuhi kewajibannya yang telah disepakati dalam kontrak manajemen
2. Tidak dapat menjalankan tugasnya dengan baik
3. Melanggar ketentuan Anggaran Dasar dan/atau peraturan perundang-undangan yang berlaku
4. Melakukan tindakan yang melanggar etika dan/ atau kepatutan yang seharusnya dihormati sebagai anggota direksi
5. Terlibat dalam tindakan yang merugikan Perseroan dan/atau negara
6. Dinyatakan bersalah dengan putusan pengadilan yang mempunyai kekuatan hukum yang tetap
7. Mengundurkan diri
8. Alasan lainnya yang dinilai tepat oleh RUPS demi kepentingan dan tujuan Perseroan

The following are the grounds for dismissing members of the Board of Directors:

1. S/he is unable/less able to perform the management contract's duties
2. S/he is incapable of carrying out their responsibilities appropriately
3. S/he undertakes violation of the Articles of Association's provisions and/or relevant laws and regulations
4. S/he takes activities that breach the ethics and/or propriety that a member of the Board of Directors should uphold
5. S/he commits acts damaging to the Company and/or the state
6. S/he is convicted in a judicial ruling with irreversible legal effect
7. S/he resigns
8. Other considerations judged acceptable by the GMS in light of the Company's interests and goals

Keputusan pemberhentian keanggotaan Direksi disampaikan secara tertulis kepada Direksi yang bersangkutan dan diberi kesempatan untuk membela diri dalam RUPS kecuali terkait alasan mengundurkan diri dan dinyatakan bersalah dalam keputusan pengadilan, namun apabila tidak keberatan dan tidak melakukan pembelaan diri maka ketentuan waktu pemberhentian sebagaimana tercantum dalam surat pemberituannya dianggap telah terpenuhi.

The decision to terminate a Board of Directors member is communicated in writing to the relevant Board of Directors, and the member is given the opportunity to defend himself at the GMS, unless the matter is related to the reasons for resigning and being found guilty in a court decision; however, if the member does not object and does not defend himself, the terms of the dismissal as stated in the notification letter are deemed fulfilled.

Seorang anggota Direksi dapat mengundurkan diri sebelum masa jabatannya berakhir dengan memberitahukan secara tertulis mengenai maksudnya tersebut kepada Perseroan dengan tembusan kepada Pemegang Saham, Direksi dan anggota Dewan Komisaris lainnya dan Perseroan wajib menyelenggarakan RUPS dalam jangka waktu 90 (sembilan puluh) hari setelah diterimanya Surat pengunduran Diri, untuk menindaklanjuti masalah tersebut atau bila tidak, pengunduran diri akan dianggap sah tanpa memerlukan persetujuan RUPS.

A member of the Board of Directors may resign prior to the expiration of his term of office by notifying the Company in writing, with a copy to the Shareholders, the Board of Directors, and other members of the Board of Commissioners, and the Company must hold a GMS within 90 (ninety) days of receipt of the resignation letter, to follow up on the matter or otherwise, the resignation will be considered valid without the approval of the GMS.

Sebelum pengunduran diri berlaku efektif, Direksi yang bersangkutan tetap berkewajiban untuk menyelesaikan tugas dan tanggung jawabnya sesuai dengan Anggaran Dasar.

The appropriate Board of Directors is still required to undertake its duties and obligations in line with the Articles of Association prior to the resignation taking effect.

Komposisi Keanggotaan Direksi Tahun 2021

Composition of the Board of Directors in 2021

Sesuai Pedoman dan Tata Kerja Direksi Bank Raya, jumlah Direksi Bank sekurang-kurangnya 3 (tiga) orang dan seluruhnya berdomisili di Indonesia. Pada tahun 2021, komposisi dan nomenklatur Direksi Bank mengalami perubahan sesuai keputusan RUPS Tahunan yang diselenggarakan pada 9 April 2021. Dalam keputusan RUPS Tahunan 2021 telah disahkan perubahan Nomenklatur sebagai berikut:

According to the Board of Directors of Bank Raya's Guidelines and Work Procedures, the Bank's Board of Directors must consist of at least three (three) individuals who are all Indonesian citizens. In 2021, the Bank's Board of Directors will be reconstituted and renamed in accordance with the decision of the Annual GMS to be held on April 9, 2021. The following revisions to the Nomenclature have been authorised by the 2021 Annual GMS:

Semula Before	Menjadi After
Direktur Operasional dan Keuangan Director of Operations and Finance	Direktur Keuangan dan Operasional Director of Finance and Operations
Direktur Risk Management Director of Risk Management	Direktur Enterprise Risk Management Compliance & Human Resource Director of Enterprise Risk Management Compliance & Human Resources
Direktur Legal, Compliance & Human Capital Director of Legal, Compliance & Human Capital	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding
Direktur Bisnis Business Director	Direktur Digital Bisnis Director of Digital Business

Susunan dan Komposisi Direksi per 31 Desember 2021 adalah sebagai berikut:

The composition and composition of the Board of Directors as of December 31, 2021 are as follows:

Nama Name	Jabatan Position	Dasar Pengangkatan Basis of Appointment	Masa Jabatan Terms of Office	Periode ke Period
Kaspar Situmorang	Direktur Utama President director	Keputusan RUPS T tanggal 9 April 2021 Decision of the AGMS on April 9, 2021	2021-2024	1
Arif Wicaksono	Direktur Keuangan dan Operasional Director of Finance and Operations	Keputusan RUPS T tanggal 19 Feb 2020 Decision of AGMS on 19 Feb 2020	2020-2023	1
Ernawan	Direktur Enterprise Risk Management, Compliance & Human Resource Director of Enterprise Risk Management, Compliance & Human Resources	Keputusan RUPS tanggal 23 Januari 2019 GMS resolution on January 23, 2019	2023	1
Sigit Murtiyoso	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	Keputusan RUPS tanggal 26 Juni 2019 GMS resolution on 26 June 2019	2019-2022	1
Bhimo Wikan Hantoro	Direktur Digital Bisnis Director of Digital Business	Keputusan RUPS tanggal 9 April 2021 GMS resolution on April 9, 2021	2021-2024	1

Tugas, Kewajiban dan Tanggung Jawab Occupational Duties and Obligations

Sebagaimana diatur di dalam pedoman kerja Direksi, tugas dan tanggung jawab Direksi sebagai berikut:

Tugas

1. Direksi bertugas mengurus, mengelola, dan memimpin jalannya Perseroan serta memelihara dan mengembangkan harta kekayaan Perseroan sesuai tujuan Perseroan.
2. Setiap anggota Direksi wajib dengan itikad baik dan penuh tanggung jawab menjalankan tugasnya dengan mengindahkan Anggaran Dasar Perseroan dan peraturan perundangan yang berlaku serta prinsip-prinsip GCG dalam kegiatan-kegiatan Bank pada seluruh tingkatan organisasi.
3. Direksi mewakili Perseroan di dalam dan di luar pengadilan tentang segala hal dan dalam segala kejadian, mengikat Perseroan dengan pihak lain dan pihak lain dengan Perseroan, serta menjalankan segala tindakan, baik mengenai pengurusan maupun pemilikan dengan batasan:
 - a) Untuk mengambil bagian baik sebagian atau seluruhnya atau ikut serta dalam perusahaan atau badan-badan lain atau menyelenggarakan perusahaan baru yang tidak dalam rangka penyelamatan piutang sesuai dengan ketentuan yang berlaku.
 - b) Melepaskan sebagian atau seluruh penyertaan Perseroan dalam perusahaan atau badan lain membubarkan, atau melikuidasi perusahaan atau badan lain dimana Perseroan memiliki penyertaan.
 - c) Mengadakan kerjasama dengan badan usaha atau pihak dalam bentuk kerjasama operasi, kontrak manajemen, kerjasama lisensi bangunan guna serah (*built operate and transfer/Bot*) Bangunan guna milik (*built operate and own/Boo*) dan perjanjian-perjanjian lainnya yang mempunyai sifat yang sama yang berlaku untuk masa lebih dari 3 tahun atau perpanjangannya yang mengakibatkan jangka waktu lebih dari 3 tahun. Direksi harus mendapat persetujuan tertulis dan atau surat-surat yang berkenaan turut ditandatangani Dewan Komisaris. Sedangkan untuk perbuatan tidak menagih lagi, mengalihkan dan melepaskan hak atas:
 - Piutang pokok macet dalam rangka restrukturisasi kredit dan atau
 - Piutang pokok macet yang telah di hapus buku dalam rangka penyelesaian kredit.
 Harus mendapatkan persetujuan terlebih dulu dari RUPS. Kewenangan tidak menagih lagi, mengalihkan dan melepaskan hak tersebut di atas dapat dilimpahkan oleh RUPS kepada Dewan Komisaris.
4. Perbuatan hukum untuk mengalihkan, melepaskan hak atau menjadikan jaminan utang seluruh atau lebih dari ½ bagian dari jumlah harta kekayaan Perseroan (setelah dikurangi seluruh

As specified in the Board of Directors' work rules, the Board of Directors' tasks and responsibilities are as follows:

Duties

1. The Board of Directors is responsible for managing, directing, and leading the Company, as well as for preserving and growing its assets in line with the Company's goals.
2. Each member of the Board of Directors shall discharge their responsibilities in good faith and with full accountability by adhering to the Company's Articles of Association, relevant laws and regulations, as well as GCG principles in all aspects of the Bank's operations.
3. The Board of Directors represents the Company in all subjects and in all circumstances, binds the Company to other parties and other parties to the Company, and carries out all management and ownership acts subject to the following limitations:
 - a) To join, either partly or entirely, in a business or other agency, or to organise a new firm, unless the purpose is to save receivables in accordance with existing legislation.
 - b) Terminating the Company's involvement in other businesses or entities, dissolving or liquidating those businesses or entities in which the Company has a stake.
 - c) Collaborating with other business entities or parties in the form of joint operations, management contracts, collaboration on building licences to transfer (*built operate and transfer/Bot*), built operate and own (*Boo*), and other similar agreements that are valid for a period of more than three years or are extended for a period of more than three years. The Board of Directors must receive formal consent and/or the Board of Commissioners must sign the required letters. Concerning the act of failing to collect, transfer, or renounce rights to:
 - Non-performing primary receivables in connection with credit restructuring and/or
 - Non-performing principle receivables that have been written off as part of the credit settlement process.
 Must acquire consent from the GMS in advance. The GMS may delegate to the Board of Commissioners the power to cease collecting, transferring, and releasing the aforementioned rights.
4. Legal action to transfer, surrender rights, or guarantee debt equal to or more than the Company's total assets (after subtracting all liabilities) as reported in the Bank's most recent

kewajiban) sebagaimana dinyatakan dalam neraca Bank yang terakhir diaudit oleh kantor akuntan publik. Baik dalam satu atau beberapa transaksi yang berdiri sendiri ataupun yang berkaitan satu sama lain dalam satu tahun buku, harus mendapatkan persetujuan RUPS yang dihadiri oleh Pemegang Saham paling sedikit $\frac{3}{4}$ bagian dari jumlah seluruh saham hak suara yang sah dan disetujui oleh paling kurang bagian $\frac{3}{4}$ dari jumlah seluruh suara yang dikeluarkan secara sah dalam rapat.

Kewajiban

1. Wajib mempertanggungjawabkan pelaksanaan tugasnya kepada Pemegang Saham melalui RUPS
2. Wajib mengungkapkan kepada pekerja kebijakan Bank yang bersifat strategis di bidang kepegawaian.
3. Wajib menyusun kebijakan remunerasi yang paling sedikit memuat :
 - Skala remunerasi berdasarkan tingkat dan jabatan; dan
 - Metode dan mekanisme penetapan remunerasi
4. Wajib menyampaikan informasi kepada Otoritas Jasa Keuangan dan Bursa efek atas kepemilikan dan setiap perubahan kepemilikannya atas saham perusahaan terbuka.
5. Wajib menciptakan dan memelihara Sistem Pengendalian Intern yang efektif serta memastikan bahwa sistem tersebut berjalan secara aman dan andal sesuai dengan tujuan pengendalian intern yang ditetapkan oleh Bank;
6. Wajib menerapkan prinsip-prinsip tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi
7. Wajib menindaklanjuti temuan audit dan rekomendasi dari satuan kerja audit intern Bank, auditor eksternal, hasil pengawasan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lain
8. Wajib menyediakan data dan informasi yang akurat, relevan, dan tepat waktu kepada Dewan Komisaris
9. Wajib melaksanakan tugas dan tanggung jawab terkait dengan penerapan Manajemen risiko sesuai dengan ketentuan yang berlaku
10. Wajib menumbuhkan dan mewujudkan terlaksananya Budaya Kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank serta memastikan terlaksananya Fungsi Kepatuhan Bank
11. Wajib mengungkapkan remunerasi dan fasilitas lain sesuai dengan ketentuan yang berlaku pada laporan pelaksanaan tata kelola dengan mengacu pada peraturan Otoritas Jasa Keuangan mengenai penerapan tata Kelola dalam pemberian remunerasi bagi Bank Umum;
12. Melaksanakan tugas dan wewenang lainnya sebagaimana ditetapkan oleh ketentuan perundang-undangan yang berlaku.

audited balance statement. Whether in a single transaction or a series of transactions that stand alone or are associated in a single fiscal year, must get permission from the GMS, which must be attended by at least of the total number of valid voting shares and authorised by at least of the total number of shares. all lawfully cast ballots during the meeting.

Obligations

1. S/he is accountable for the GMS's execution of their duty to Shareholders.
2. S/he or she must communicate to staff the Bank's strategic personnel policies.
3. The Board of Directors is required to adopt a pay policy that includes at a minimum the following:
 - A scale of compensation depending on level and position; and
 - Remuneration methods and procedures
4. S/he notifies the Financial Services Authority and the Stock Exchange about his or her ownership and any changes in ownership of a public company's shares.
5. S/he is responsible for developing and maintaining an effective internal control system and ensuring that it operates safely and reliably in line with the Bank's internal control goals;
6. S/he is responsible for ensuring that good governance standards are applied to the Bank business activities at all levels or levels of the organisation.
7. The Board of Directors is responsible for following up on audit findings and recommendations from the Bank's internal audit work unit, external auditors, the Financial Services Authority's and/or other authorities' oversight.
8. S/he presents the Board of Commissioners with accurate, pertinent, and timely data and information.
9. S/he must fulfil all tasks and obligations associated with risk management implementation in line with relevant rules.
10. It is required for the Board of Directors to create and execute a Compliance Culture across the Bank's organisation and commercial operations, as well as to oversee the Bank's Compliance Function.
11. The Board of Directors is required to disclose remuneration and other benefits in accordance with applicable provisions in the report on governance implementation, referencing the Financial Services Authority's regulations on the implementation of good governance in the provision of remuneration for Commercial Banks.
12. S/he performs other responsibilities and functions as specified by relevant laws and regulations.

Tanggung Jawab

1. Setiap anggota Direksi bertanggung jawab secara tanggung renteng atas kerugian Perseroan yang disebabkan oleh kesalahan atau kelalaian anggota Direksi dalam menjalankan tugasnya, kecuali dapat membuktikan :
 - Kerugian tersebut bukan karena kesalahan atau kelalaiannya telah melakukan pengurusan dengan itikad baik, penuh tanggung jawab, dan kehati-hatian untuk kepentingan dan sesuai dengan maksud dan tujuan emiten atau perusahaan publik
 - Tidak mempunyai benturan kepentingan baik langsung maupun tidak langsung atas tindakan pengurusan yang mengakibatkan kerugian
 - Telah mengambil tindakan untuk mencegah timbul atau berulangnya kerugian tersebut
2. Dalam rangka pengendalian umum, Direksi bertanggung jawab menciptakan struktur pengendalian intern (audit Intern, Manajemen risiko, dan Komite Manajemen risiko, Unit Kerja Kepatuhan), menjamin terlaksananya fungsi audit intern dalam setiap tingkatan manajemen dan menindaklanjuti temuan audit sesuai dengan kebijakan dan pengarahan yang diberikan Dewan Komisaris, temuan pengawas Bank Indonesia/OJK dan atau hasil pengawasan otoritas lainnya.

Responsibilities

1. Each member of the Board of Directors is equally and severally liable for the Company's losses caused by their mistakes or carelessness in carrying out his/her responsibilities, unless s/he is capable of establishing the following:
 - The loss is not his/her fault or carelessness; he/she acted in good faith, with full responsibility, and with caution for the benefit of and in line with the issuer's or public company's goals and objectives.
 - S/he does not have a direct or indirect conflict of interest regarding management decisions that result in losses
 - S/he has taken steps to avert the loss's recurrence or continuance
2. In terms of general control, the Board of Directors is responsible for developing an internal control structure (Internal audit, Risk Management, and Risk Management Committee, Compliance Unit), ensuring the implementation of the internal audit function at all levels of management and following up on audit findings in accordance with the policies and directives provided for given by the Board of Commissioners, the findings of the supervisors of Bank Indonesia/FSA and or the results of the supervision of other authorities.

Pembagian Tugas dan Tanggung Jawab Masing-masing Direksi

Division of Duties of the Board of Directors

Pembagian tugas dan wewenang setiap anggota Direksi ditetapkan oleh RUPS dan telah dikuatkan di dalam pedoman tata kerja Direksi, tanggal 4 Oktober 2018 dan telah diperbaharui sesuai dengan Surat Keputusan Direksi No.Kpts. B.14/DIR.01.02/SKp/08/2020 tanggal 14 Agustus 2020 sebagai berikut:

Direktur Utama

1. Meningkatkan *prudential banking*, agar dalam kegiatan bank senantiasa berpedoman kepada Standar operasional dan prosedur (SOP), kepatuhan dan Manajemen risiko.
2. Menyusun perencanaan dan konsep-konsep strategi pencapaian sasaran-sasaran bisnis sesuai dengan perencanaan anggaran yang telah ditetapkan dalam rapat kerja tahunan serta melakukan evaluasi berkala atas pencapaian sasaran bisnis.
3. Meningkatkan citra dan kinerja bank yang diperlihatkan oleh neraca dan bank *profitability (income statement)* yang optimum dengan pencapaian tingkat kesehatan bank kategori "sehat tanpa syarat" berdasarkan hasil pemeriksaan tahunan Otoritas Jasa Keuangan pada tahun yang bersangkutan.
4. Meningkatkan kualitas sumber daya manusia melalui pendidikan dan latihan yang terstruktur sesuai dengan tingkat kebutuhan setiap unit kerja yang ada.

The GMS determines the duties and authorities of each member of the Board of Directors, which are confirmed in the Board of Directors' guidelines for work procedures, dated October 4, 2018, and updated in accordance with the Board of Directors' Decree No. Kpts. B.14/DIR.01.02/SKp/08/2020, dated August 14, 2020:

President Director

1. Improving prudential banking by ensuring that all bank operations are directed by operational standards and procedures (SOP), compliance, and risk management.
2. Developing plans and strategic ideas for attaining company objectives in line with the annual work meeting's budget planning and conducting periodic reviews of business goal attainment.
3. Improving the bank's image and performance as measured by the balance sheet and achieving maximum bank profitability (income statement) while maintaining a bank soundness level of "unconditional healthy" as determined by the Financial Services Authority's annual inspection results for the relevant year.
4. Improving the quality of human resources via organised education and training that is appropriate for each current work unit's degree of demand.

5. Mengkoordinasi pelaksanaan tugas Divisi Sekretariat perusahaan dan Satuan Kerja audit Internal
6. Melaksanakan tugas lainnya sesuai dengan ketentuan yang berlaku.

Direktur Keuangan dan Operasional

1. Meningkatkan *prudential banking* agar dalam kegiatan bank senantiasa berpedoman kepada Standar operasional dan prosedur (SOP), Kepatuhan dan Manajemen risiko;
2. Menyusun perencanaan dan konsep-konsep strategi pencapaian sasaran-sasaran kerja sesuai dengan perencanaan anggaran Direktorat operasional dan Keuangan yang telah ditetapkan dalam rapat kerja tahunan;
3. Meningkatkan *availability* dan *reliability* teknologi sistem informasi bank untuk mendukung aktivitas operasional bank;
4. Meningkatkan image pelayanan bank yang sesuai dengan standar layanan bank di Unit Kerja dan aktivitas produk *treasury*;
5. Meningkatkan tertib pencatatan keuangan agar selalu patuh kepada pedoman Standar akuntansi Keuangan (PSAK) yang berlaku;
6. Meningkatkan kualitas sumber daya manusia melalui pendidikan dan latihan yang terstruktur sesuai dengan tingkat kebutuhan setiap unit kerja yang ada di bawahnya;
7. Mengkoordinasikan dan memantau pelaksanaan satuan kerja di bawah supervisi Direktorat operasional dan Keuangan serta Komite aset dan Liabilitas (ALCO) dan Komite pengarah teknologi Informasi (IT Steering Committee);
8. Melaksanakan tugas lainnya sesuai dengan ketentuan yang berlaku.

Direktur Enterprise Risk Management, Compliance & Human Resource

1. Menyusun perencanaan dan konsep-konsep strategi pencapaian sasaran-sasaran kerja sesuai dengan perencanaan anggaran Direktorat *Risk Management*;
2. Meningkatkan tertib administrasi, khususnya dalam hubungannya dengan perkreditan agar tercipta pengelolaan bank yang hati-hati atau *prudential banking*;
3. Meningkatkan pembinaan dan penyelesaian atas kredit-kredit bermasalah agar tingkat kesehatan bank tetap terjaga;
4. Merumuskan Strategi guna mendorong terciptanya Budaya Kepatuhan Bank;
5. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi;
6. Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank;
7. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan, termasuk Prinsip Syariah bagi bank umum syariah dan unit usaha syariah;

5. Coordination of the Corporate Secretariat Division's and the Internal Audit Work Unit's activities.
6. Performing other responsibilities as required by applicable rules.

Director of Finance and Operations

1. Improving prudential banking by ensuring that all bank operations are governed by Standard Operating Procedures (SOP), compliance, and risk management;
2. Developing plans and strategic ideas for attaining work objectives in line with the Directorate of Operations and Finance's annual work meeting-determined budget planning;
3. Enhancing the availability and reliability of bank information system technology in order to facilitate bank operating tasks;
4. Improving the image of bank services in the Work Unit and treasury product operations in line with bank service standards;
5. Organising financial records in such a manner that they always adhere to appropriate Financial Accounting Standards (PSAK) requirements;
6. Improving the quality of human resources by structuring education and training to meet the specific demands of each work unit;
7. Coordination and oversight of work units reporting to the Directorate of Operations and Finance, the Assets and Liabilities Committee (ALCO), and the Information Technology Steering Committee (IT Steering Committee);
8. Performing other responsibilities as required by applicable rules.

Director of Enterprise Risk Management, Compliance, and Human Resources

1. Developing plans and strategic ideas for attaining work objectives in line with the Risk Management Directorate's budget planning;
2. Improving administrative organisation, especially in the credit sector, in order to foster responsible banking management;
3. Improving the development and settlement of non-performing loans in order to sustain banks' risk-based rating;
4. Developing a Strategy to Promote the Development of a Compliance Culture in Banks;
5. Proposing compliance rules or principles to the Board of Directors for approval;
6. Developing compliance systems and processes that will be utilised to develop the Bank's internal policies and procedures;
7. Ensuring that all policies, provisions, systems, and procedures, as well as business activities conducted by the Bank, are compliant with the Financial Services Authority's rules and regulations, as well as applicable laws and regulations, including Sharia Principles for sharia commercial banks and sharia business units;

8. Meminimalkan Risiko Kepatuhan Bank;
 9. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank atau pimpinan kantor cabang dari bank yang berkedudukan di luar negeri tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; dan
 10. Melakukan tugas lain yang terkait dengan fungsi Kepatuhan, antara lain memantau dan menjaga kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan maupun otoritas pengawas lainnya yang berwenang.
 11. Dalam rangka penerapan Program Anti Pencucian Uang (APU) dan Pencegahan Pendanaan Terorisme (PPT), Direktur Kepatuhan memiliki tugas dan tanggung jawab sekurang – kurangnya untuk:
 - 1) Memastikan Bank memiliki dan menetapkan kebijakan dan prosedur penerapan APU dan PPT yang bersifat teknis dan strategis;
 - 2) Mengusulkan kebijakan dan prosedur tertulis yang bersifat strategis mengenai penerapan program APU dan PPT kepada Dewan Komisaris;
 - 3) Memastikan penerapan program APU dan PPT dilaksanakan sesuai dengan kebijakan dan prosedur tertulis yang telah ditetapkan;
 - 4) Membentuk unit kerja khusus dan/atau menunjuk pejabat yang bertanggung jawab terhadap penerapan APU dan PPT;
 - 5) Melakukan pengawasan atas kepatuhan unit kerja dalam menerapkan program APU dan PPT;
 - 6) Memastikan bahwa kebijakan dan prosedur tertulis mengenai penerapan program APU dan PPT sejalan dengan perubahan dan pengembangan produk, jasa, dan teknologi di sektor jasa keuangan serta sesuai dengan perkembangan modus Pencucian Uang dan/atau Pendanaan Terorisme; dan
 - 7) Memastikan bahwa seluruh pegawai, khususnya pegawai dari satuan kerja terkait dan pegawai baru, telah mengikuti pelatihan yang berkaitan dengan penerapan program APU dan PPT secara berkala.
 12. Meningkatkan kualitas *human capital* yang profesional dan berintegritas dengan implementasi budaya kerja Bank;
 13. Wajib melaporkan pelaksanaan tugas dan tanggung jawabnya kepada Direktur Utama dengan tembusan kepada Dewan Komisaris, paling sedikit secara triwulanan;
 14. Meningkatkan kualitas sumber daya manusia melalui pendidikan dan latihan yang terstruktur sesuai dengan tingkat kebutuhan setiap unit kerja yang ada di bawahnya;
 15. Mengkoordinasi dan memantau pelaksanaan satuan kerja dibawah supervisi Direktorat *Legal, Compliance & Human Capital*;
 16. Melaksanakan tugas lainnya sesuai dengan ketentuan yang berlaku.
8. Reducing the bank's risk of non-compliance;
 9. Taking preventative steps to ensure that the Bank's Board of Directors or the head of a branch office of a bank domiciled overseas does not depart from the Financial Services Authority's and applicable laws and regulations; and
 10. Performing additional compliance-related activities, including as monitoring and ensuring that the Bank adheres to its obligations to the Financial Services Authority and other appropriate supervisory bodies.
 11. As part of executing the Anti-Money Laundering (APU) and Counter-Terrorism Financing (PPT) Program, the Compliance Director is accountable for the following:
 - 1) Ensuring that the Bank has and adheres to technical and strategic policies and processes for the execution of APU and PPT;
 - 2) Presenting to the Board of Commissioners detailed policies and procedures of a strategic character pertaining to the operation of the APU and PPT programmes;
 - 3) Ensuring that the APU and PPT programmes are implemented in compliance with the specified written rules and procedures;
 - 4) Establishing a dedicated work unit and/or appointing personnel responsible for the APU and PPT's implementation;
 - 5) Monitoring work units' compliance with the APU and PPT programmes' implementation;
 - 6) Ensuring that written policies and procedures governing the implementation of AML and CFT programmes are updated to reflect changes and developments in the financial services sector's products, services, and technology, as well as the evolution of money laundering and/or terrorism financing methods; and
 - 7) Ensuring that all workers, particularly those from relevant work units and new hires, get frequent training on how to administer APU and PPT programmes.
 12. Improving the quality of professional and ethical human capital via the adoption of the Bank's work culture;
 13. S/he is required to report on the performance of tasks and obligations to the President Director on a quarterly basis, with a copy to the Board of Commissioners;
 14. Improving the quality of human resources via systematic education and training that is tailored to the specific demands of each work unit within the organisation;
 15. Coordination and oversight of work units reporting to the Directorate of Legal, Compliance, and Human Capital;
 16. Performing other responsibilities as required by applicable regulations.

Direktur Retail Agri dan Pendanaan

1. Melaksanakan *prudential banking* agar dalam kegiatan bank senantiasa berpedoman kepada Standar Operasional dan Prosedur (SOP), Kepatuhan dan Manajemen Risiko;
2. Menyusun perencanaan dan konsep-konsep strategi pencapaian sasaran-sasaran kerja sesuai dengan perencanaan anggaran Direktorat Retail Agri dan Pendanaan yang telah ditetapkan dalam rapat kerja tahunan;
3. Meningkatkan image bank melalui penciptaan strategi pemasaran yang inovatif, efektif dan efisien serta menentukan segmentasi pasar kredit;
4. Meningkatkan hubungan baik dengan nasabah utama (*Captive*) dan menciptakan nasabah baru (menambah *customer base*), baik agribisnis maupun sektor potensial lainnya;
5. Menjaga dan meningkatkan hubungan baik dengan lembaga-lembaga yang berkaitan erat dengan kredit dan pendanaan;
6. Meningkatkan image pelayanan bank melalui penciptaan program inovatif, produk retail agri dan produk pendanaan (DPK);
7. Meningkatkan kualitas sumber daya manusia melalui pendidikan dan latihan yang terstruktur sesuai dengan tingkat kebutuhan setiap unit kerja yang ada di bawahnya;
8. Mengkoordinasi dan memantau pelaksanaan satuan kerja di bawah supervisi Direktorat Retail Agri dan Pendanaan serta Komite Kredit;
9. Melaksanakan tugas lainnya sesuai dengan ketentuan yang berlaku.

Direktur Bisnis Digital

1. Melaksanakan *prudential banking* agar dalam kegiatan bank senantiasa berpedoman kepada Standar operasional dan prosedur (SOP), Kepatuhan dan Manajemen risiko;
2. Menyusun perencanaan dan konsep-konsep strategi pencapaian sasaran-sasaran kerja sesuai dengan perencanaan anggaran Direktorat Digital Bisnis yang telah ditetapkan dalam rapat kerja tahunan;
3. Meningkatkan image bank melalui penciptaan strategi pemasaran yang inovatif, efektif dan efisien serta menentukan segmentasi pasar kredit;
4. Meningkatkan hubungan baik dengan nasabah utama (*Captive*) dan menciptakan nasabah baru (menambah *customer base*), baik agribisnis maupun sektor potensial lainnya;
5. Menjaga dan meningkatkan hubungan baik dengan lembaga-lembaga yang berkaitan erat dengan kredit dan pendanaan;
6. Meningkatkan image pelayanan bank melalui penciptaan program inovatif, produk *digital banking* dan produk dana pihak ketiga (DPK);
7. Meningkatkan kualitas sumber daya manusia melalui pendidikan dan latihan yang terstruktur sesuai dengan tingkat kebutuhan setiap unit kerja yang ada di bawahnya;

Director of Agri Retail and Funding

1. Adopting prudential banking practises, which ensure that all bank operations are governed by Standard Operating Procedures (SOP), compliance, and risk management;
2. Developing plans and strategic ideas for accomplishing work objectives in line with the Directorate of Retail, Agri, and Funding's annual work meeting-determined budget planning;
3. Enhancing the bank's image via the development of new, effective, and efficient marketing methods, as well as identifying the credit market's segmentation;
4. Strengthening relationships with important clients (*Captive*) and acquiring new ones (growing customer base), both in agriculture and in other prospective industries;
5. Maintaining and strengthening positive relationships with entities involved in lending and finance;
6. Enhancing the bank's image via the development of novel programmes, Agri-retail goods, and financing products (DPK);
7. Improving the quality of human resources via systematic education and training that is tailored to the specific demands of each work unit within the organisation;
8. Coordinating and supervising the execution of work units under the direction of the Retail Agriculture and Funding Directorate and the Credit Committee.
9. Performing other responsibilities as required by applicable legislation.

Director of Digital Business

1. Adopting prudential banking practises in order to ensure that the bank's operations are constantly directed by Standard Operating Procedures (SOP), compliance, and risk management;
2. Creating plans and strategic ideas for attaining work objectives in line with the Digital Business Directorate's annual work meeting-determined budget planning;
3. Enhancing the bank's image via the development of new, effective, and efficient marketing methods, as well as identifying the credit market's segmentation;
4. Strengthening relationships with important clients (*Captive*) and acquiring new ones (growing customer base), both in agriculture and in other prospective industries;
5. Maintaining and strengthening positive relationships with entities involved in lending and finance;
6. Enhancing the bank's image via the development of new programmes, digital banking products, and third-party investment products (DPK);
7. Improving the quality of human resources via systematic education and training that is tailored to the specific demands of each work unit within the organisation;

8. Mengkoordinasi dan memantau pelaksanaan satuan kerja di bawah supervisi Direktorat Bisnis serta Komite Kredit; 9. Melaksanakan tugas lainnya sesuai dengan ketentuan yang berlaku	8. Coordination and supervision of work units under the direction of the Business Directorate and Credit Committee; 9. Performing other responsibilities as required by applicable legislation

Hak dan Wewenang Direksi

Rights and Authorities of the Board of Directors

1. Direktur Utama berhak dan berwenang bertindak untuk dan atas nama Direksi serta mewakili perusahaan. Dalam hal Direktur Utama tidak hadir atau berhalangan karena sebab apapun juga, hal mana tidak perlu dibuktikan kepada pihak ketiga, maka salah seorang anggota Direksi lainnya berhak dan berwenang bertindak untuk dan atas nama Direksi serta mewakili Perseroan. 2. Direksi dengan tidak mengurangi tanggung jawabnya berhak untuk mengangkat seorang atau lebih sebagai kuasanya dengan memberikan kepada mereka wewenang untuk melakukan tindakan-tindakan tertentu dengan cara mengeluarkan surat kuasa khusus. Wewenang demikian harus dilaksanakan sesuai Anggaran Dasar Perseroan.	1. The President Director has the ability and responsibility to act on behalf of and on behalf of the Board of Directors, as well as to represent the firm. If the President Director is unable to attend for any reason that does not need proof to a third party, another member of the Board of Directors has the right and power to act for and on behalf of the Board of Directors and to represent the Company. 2. Without prejudice to their other obligations, the Board of Directors has the ability to designate one or more individuals as their proxies by authorising them to act on their behalf via the issuance of a special power of attorney. This power must be exercised in conformity with the Articles of Association of the Company.

Etika Kerja

Work Ethics

Dalam melaksanakan tugas, wewenang, kewajiban, dan tanggung jawab sebagaimana dimaksud di atas, anggota Direksi harus senantiasa bertindak sesuai dengan etika kerja sebagai berikut:

1. Mematuhi Anggaran Dasar Perseroan dan peraturan perundang-undangan yang berlaku serta senantiasa memperhatikan prinsip transparansi, akuntabilitas, pertanggungjawaban, independen dan profesionalisme. 2. Bertindak sesuai visi dan misi Perseroan. 3. Beritikad baik dan penuh kehati-hatian dalam pengelolaan Perseroan. 4. Menghindari aktivitas yang mengandung benturan kepentingan antara kepentingan pribadi, keluarga, Pemegang Saham atau pihak lain dengan kepentingan Perseroan. 5. Dilarang mengambil keuntungan dan/atau menerima keuntungan pribadi dari Perseroan selain remunerasi dan fasilitas lain yang ditetapkan. 6. Apabila terdapat transaksi yang berpotensi mengandung benturan kepentingan, maka harus terlebih dahulu dilakukan tahapan sesuai dengan peraturan perundang-undangan yang berlaku seperti peraturan Badan pengawas pasar Modal dan Lembaga Keuangan maupun peraturan Otoritas Jasa Keuangan.	Members of the Board of Directors must always act in accordance with the following work ethics when carrying out their duties, authorities, obligations, and responsibilities as outlined above: 1. Adhere to the Articles of Association of the Company and all relevant laws and regulations, constantly bearing in mind the values of transparency, accountability, responsibility, independence, and professionalism. 2. S/he behaves in accordance with the Company's vision and goal. 3. S/he acts with integrity and caution in the administration of the Company. 4. S/he abstains from acts that pit personal interests, family, shareholders, or other parties against the Company's interests. 5. S/he is prohibited from obtaining personal advantages from the Company in addition to the compensation and other perks indicated. 6. If a transaction has the potential to create a conflict of interest, it must first be conducted in compliance with relevant laws and regulations, such as the Capital Market Supervisory Agency's and Financial Institutions' rules, as well as the Financial Services Authority's regulations.

7. Dilarang untuk memberikan atau menawarkan kepada nasabah atau seorang pejabat pemerintah dalam bentuk apapun dengan tujuan untuk mempengaruhi keputusan dari nasabah atau pejabat dimaksud terkait dengan jabatannya baik langsung maupun tidak langsung.
8. Memberikan keteladanan atas perilaku etis dan nilai-nilai korporasi Perseroan.

7. S/he is banned from giving or offering anything to a customer or a government official with the intent of influencing the customer's or official's choice in regard to his position, either directly or indirectly.
8. S/he serves as a role model for the Company's ethical behaviour and business principles.

Pengelolaan Benturan Kepentingan Direksi

Management of the Board of Directors' Conflicts of Interest

Dalam hal terjadi benturan kepentingan anggota Direksi dilarang mengambil tindakan yang dapat merugikan Bank atau mengurangi keuntungan Bank dan wajib mengungkapkan benturan kepentingan dalam setiap keputusannya, sehingga untuk melakukan perbuatan hukum berupa transaksi yang memuat benturan kepentingan antara kepentingan ekonomis pribadi anggota Direksi tersebut diperlukan persetujuan RUPS berdasar suara terbanyak dari Pemegang Saham yang tidak mempunyai benturan kepentingan.

In the event of a conflict of interest, members of the Board of Directors are prohibited from taking actions that would harm the Bank or reduce its profits and are required to disclose the conflict of interest in any of their decisions, such that legal actions involving transactions involving conflicts of interest between the personal economic interests of members of the Board of Directors require approval by the GMS through a vote. The majority of Shareholders who are not involved in a conflict of interest.

Program Pengenalan Perusahaan Bagi Direksi Baru

Orientation Program to Introduce Businesses to New Commissioners

Program pengenalan kepada Direktur yang baru diangkat bertujuan untuk memberikan pengetahuan mengenai Perseroan, agar dapat memahami tugas dan tanggung jawab sebagai Direktur, proses bisnis Perseroan, serta dapat bekerja selaras dengan organ Perseroan lainnya.

Sekretaris perusahaan sebagai pelaksana program pengenalan bagi Direktur yang baru diangkat, mempersiapkan materi program pengenalan yang meliputi program pengenalan perusahaan berkaitan dengan:

1. Pelaksanaan prinsip-prinsip GCG dalam Perseroan
2. Visi, misi, strategi, risiko, posisi kompetitif, kinerja keuangan dan operasional
3. Kewenangan Komite, audit Internal dan eksternal dan sistem pengendalian internal
4. Serta hal-hal penting lainnya yang dapat diberikan berupa presentasi, pertemuan, kunjungan ke perusahaan dan pengkajian dokumen atau program lainnya.

The newly appointed Directors' orientation programme is designed to offer information about the Company in order for them to understand their roles and obligations as Directors, the Company's business processes, and how to operate together with other Company organs.

The Corporate Secretary, in her capacity as executor of the newly appointed Director's introduction programme, prepares material for the programme, which includes the Company's introduction programme.

1. Application of GCG concepts across the organisation
2. Strategy, vision, purpose, risk, competitive position, financial and operational performance
3. The Committee's authority, internal and external auditing, and the internal control system
4. In addition to other critical information that may be conveyed via presentations, meetings, corporate visits, and the inspection of papers or other programmes.

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organiser	Waktu & Tempat Time and place
Kaspar Situmorang	Direktur Utama	Pendidikan "Executive Coaching Bank Management for Board of Directors"	LPPI	24 - 25 April 2021
	President Director	Education of "Executive Coaching Bank Management for Board of Directors"		24 - 25 April 2021
Bhimo Wikan Hantoro	Direktur Digital Business	Pendidikan "Executive Coaching Bank Management for Board of Directors"	LPPI	24 - 25 April 2021
	Director of Digital Business	Education of "Executive Coaching Bank Management for Board of Directors"		24 - 25 April 2021

Pelaksanaan Tugas Direksi Implementation of the Duties of the Board of Directors

Laporan Pelaksanaan Tugas Direksi tahun 2021 telah membuat berbagai keputusan yang ditujukan untuk menunjang operasional Bank dan menunjang upaya Bank dalam mencapai target yang diterapkan, antara lain melakukan pengkinian aturan untuk menyesuaikan dengan perkembangan perbankan yang berlaku.

The 2021 Report on the Board of Directors' Duties made a number of decisions aimed at assisting the Bank's operations and efforts to accomplish established aims, including amending the regulations to reflect current banking trends.

Pengkinian yang telah dilakukan antara lain :

Several updates have been made, including the following:

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
1.	B. 01/Dir.03.05/JLN/01/2021	5 Jan 2021 Jan 5, 2021	Pedoman pelaksanaan <i>Closed Circuit Television</i> (CCTV) Revisi ketiga Guidelines for the implementation of Closed Circuit Television (CCTV) Third revision
2.	B. 05 /Dir.03/RMG/MOP/01/2021	12 Jan 2021 Jan 12, 2021	Penyampaian Laporan Rasio Pengungkit BRI Agro Periode Triwulan IV 2020 Submission of the BRI Agro Leverage Ratio Report for the Fourth Quarter 2020
3.	B. 19/Dir.01.05/JLN/01/2021	18 Jan 2021 Jan 18, 2021	Pengadaan Jasa Konsultan Hukum Rekanan Procurement of Partner Legal Consulting Services
4.	B. 21/DIR.01.05/JLN/01/2021	20 Jan 2021 Jan 20, 2021	Kebijakan akuntansi kebijakan pengukuran penurunan nilai aset keuangan Accounting policy for measuring impairment of financial assets
5.	B. 29/Dir.01.03/ADK/01/2021	20 Jan 2021 Jan 20, 2021	Tim pelaksanaan validasi berkas kredit BRI Agro BRI agro credit file validation implementation team
6.	B.29A/Dir.01.03/ADK/01/2021	20 Jan 2021 Jan 20, 2021	Revisi Pedoman Pelaksanaan Kredit Ritel (PPK-Ritel) Revision of Retail Credit Implementation Guidelines (PPK-Retail)
7.	B. 31/Dir.01/SKP/I/2021	28 Jan 2021 Jan 28, 2021	Tim <i>re-branding</i> BRI Agro BRI Agro re-branding team
8.	R. 33/Dir.01.02/HCP/I/2021	28 Jan 2021 Jan 28, 2021	Pengadaan jasa konsultan hukum rekanan BRI Agro Procurement of legal consultant services for BRI Agro partners

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
9.	B. 35/Dir.02/LCA/01/2021	28 Jan 2021 Jan 28, 2021	Permohonan izin kembali atas aktivitas baru transaksi kartu debit BRI Agro pada jaringan <i>link debit</i> jalin Re-application for new activities for BRI Agro debit card transactions on the interlinked debit link network
10.	B. 70/Dir.01.05/JLN/02/2021	16 Feb 2021 Feb 16, 2021	penurunan status dan penutupan unit kerja BRI Agro downgrading and closing of BRI Agro work units
11.	B. 73/Dir.05/OPS/PPA/II/2021	16 Feb 2021 Feb 16, 2021	Perjanjian Kerjasama (PKS dan NDA) Pemberian Akses dalam Rangka Perhitungan CKPN PSAK 71 BRI Agro Cooperation Agreement (PKS and NDA) Granting Access in the Context of Calculation of CKPN PSAK 71 BRI Agro
12.	B. 74/Dir.04.05/TRY02/2021	16 Feb 2021 Feb 16, 2021	Penetapan kebijakan suku bunga simpanan pinjaman dan stp Determination of interest rate policy on loan deposits and stp
13.	B. 80/Dir.03.05/JLN.03/2021	1 Maret 2021 March 1, 2021	Pedoman pelaksanaan <i>project management</i> direksi BRI Agro Guidelines for implementing project management for BRI Agro directors
14.	B. 83.a/Dir.03.04/ADK/03/2021	1 Maret 2021 March 1, 2021	<i>Loan Approval System</i> (las konsumen) Loan Approval System (consumer welding)
15.	B. 99/Dir.01.03/JLN/03/2021	23 Maret 2021 March 23, 2021	Pedoman pelaksanaan tabungan BRI Agro Infiniti Guidelines for implementing BRI Agro Infiniti savings
16.	B. 105.a/Dir.03.04/ADK/03/2021	23 Maret 2021 March 23, 2021	<i>Loan Approval System</i> (las konsumen) Loan Approval System (consumer welding)
17.	B.114A/Dir.01.05/OPS- AKP/04/2021	5 April 2021 April 5, 2021	Surat pernyataan manajemen atas audit laporan keuangan BRI Agro utk tahun yg berakhir pada 31 Des 2020 Management statement letter on the audit of BRI Agro's financial statements for the year ended 31 Dec 2020
18.	B. 116/Dir.03.04/JLN/04/2021	6 April 2021 April 6, 2021	Pedoman pelaksanaan jurnal pembukuan pemindahtanganan dan atau penghapusbukuan aktiva tetap tidak bergerak Guidelines for the implementation of bookkeeping journals, transfers and or write-offs of immovable fixed assets
19.	B. 117/Dir.03.04/JLN/04/2021	6 April 2021 April 6, 2021	Pedoman pelaksanaan jurnal pembukuan pemindahtanganan dan atau penghapusbukuan aktiva tetap bergerak Guidelines for the implementation of bookkeeping journals, transfers and or write-offs of movable fixed assets
20.	B. 117A/Dir.05.04/JLN/2021	6 April 2021 April 6, 2021	Buku Pedoman Operasional Pengalihan Penutupan Rekening Unit Kerja Operational Manual of Work Unit Account Closing Transfer
21.	B.120/Dir.03.04/JLN/04/2021	8 April 2021 April 8, 2021	Pedoman pelaksanaan pembentukan dan pengkinian data CIF perorangan dengan menggunakan elemen foto data kependudukan (Dukcapil) Guidelines for implementing the formation and updating of individual CIF data using the photo element of population data (Dukcapil)
22.	B.139/DIR.04.05/JLN/2021	13 April 2021 April 13, 2021	Pedoman Pelaksanaan Pemindahtanganan dan atau Penghapusbukuan Aktiva tetap Bergerak Guidelines for the Implementation of the Transfer and or Write-off of Movable Fixed Assets
23.	B.140/DIR.04.05/JLN/2021	13 April 2021 April 13, 2021	Pedoman Pelaksanaan Penjualan oleh Panitia Pemindahtanganan dan atau Penghapusbukuan Aktiva tetap Bergerak Guidelines for the Implementation of Sales by the Committee for the Transfer and/or Write-off of Movable Fixed Assets
24.	B. 140.a/Dir02.04/JLN/04/2021	13 April 2021 April 2021	Pedoman Pelaksanaan Penjualan oleh Panitia Pemindahtanganan dan atau Penghapusbukuan Aktiva tetap tidak Bergerak Guidelines for the Implementation of Sales by the Committee for the Transfer and or Write-off of Fixed Assets

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
25.	B. 140.b/Dir.02.04/JLN/04/2021	13 April 2021 April 13, 2021	Pedoman Pelaksanaan Pemindahtanganan dan atau Penghapusbukuan Aktiva tetap tidak Bergerak Guidelines for the Implementation of the Transfer and or Write-off of Immovable Fixed Assets
26.	B. 141/Dir.04.05/JLN/04/2021	14 April 2021 April 14, 2021	Pedoman pelaksanaan <i>scripless securities settlement system</i> Guidelines for the implementation of the scripless securities settlement system
27.	B. 141A/Dir.02.03/PRK/2021	14 April 2021 April 14, 2021	SK Penyelesaian AIDA KCN SK of Completion of AIDA KCN
28.	B. 142/DIR.02.04/ADK/04/2021	15 April 2021 April 15, 2021	Penetapan direktur pengganti u/ komite kredit Appointment of substitute director for credit committee
29.	B. 149/Dir.02.04/JLN/2021	20 April 2021 April 20, 2021	Implementasi <i>Standar Quick Response Code</i> Untuk Pembayaran Direksi BRI Agro Implementation of Quick Response Code Standards for BRI Agro Directors' Payments
30.	B. 149A/Dir.02.04/OJL/2021	20 April 2021 April 20, 2021	Pedoman Pelaksanaan Penilaian Tingkat Kesehatan Bank Berbasis Risiko Guidelines for the Implementation of Risk-Based Bank Soundness Level
31.	B.150/Dir.02.Ka.Desk/ JLN/04/2021	21 April 2021 April 21, 2021	Buku Pedoman Operasional BI <i>Scripless Securities Settlement System</i> PT BRI Agro BI Scripless Securities Settlement System Operational Manual PT BRI Agro
32.	B.161.C/Dir.02.04/OJL/04/2021	21 April 2021 April 21, 2021	Pedoman Pelaksanaan Dir Pembina Kanca dan Unit Kerja Dibawahnya Guidelines for the Implementation of Kanca Trustees and Subordinate Work Units
33.	B. 191/Dir.02.04/OJL/05/2021	21 Mei 2021 May 21, 2021	Tarik tunai indomaret Indomaret cash withdrawal
34.	B.192/Dir.02.04/OJL/ KOP/05/2021	21 Mei 2021 May 21, 2021	Pedoman pelaksanaan ALCO ALCO implementation guidelines
35.	B. 207/Dir.02.04/OJL/05/2021	21 Mei 2021 May 21, 2021	BRI Agro <i>open application programming interface</i>
36.	B.228A/Dir.ADK/KKJ/05/2021	28 Mei 2021 May 28, 2021	Relaksasi Penyampaian Laporan Keuangan untuk Debitur Eksiting Bank BRI Agro Relaxation of Financial Report Submission for Existing Debtors of Bank BRI Agro
37.	B.233/Dir.02.04/JLN/06 /2021	28 Mei 2021 May 28, 2021	SK Direksi tentang Pembukaan Rekening <i>Online</i> Decree of the Board of Directors regarding Online Account Opening
38.	B. 240B/Dir.02.04/TI/ PPC/06/2021	28 Mei 2021 May 28, 2021	Tim <i>Agile Squad</i> APPS BRI Agro Digital PT BRI Agro Agile Squad APPS BRI Agro Digital Team PT BRI Agro
39.	B. 284/Dir.02.04/ADK/06/2021	28 Mei 2021 May 28, 2021	Segmentasi Bisnis Business Segmentation
40.	B. 285/Dir.03.04/OJL/06/2021	16 Juni 2021 June 16, 2021	Penetapan Direktur Pengganti Appointment of Substitute Director
41.	B. 286/Dir.02.04/OJL/06/2021	16 Juni 2021 June 16, 2021	Pedoman dan Tata Kerja Direksi Guidelines and Work Procedures of the Board of Directors
42.	B. 286.A/Dir.02.04/OPK/06/2021	16 Juni 2021 June 16, 2021	Penetapan Direksi Pengganti untuk putusan kredit Stipulation of Substitute Directors for credit decisions
43.	B. 300/Dir.02.04/JLN/06/2021	28 Juni 2021 June 28, 2021	Kartu Debit Jaringan ATM Bersama Direksi BRI Agro Debit Card ATM Network with BRI Agro Directors

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
44.	B.301/Dir.02.04/JLN/06/2021	28 Juni 2021 June 28, 2021	Standar Operasional Layanan <i>Link</i> Standard Operational Service Link
45.	B.309/Dir.02.04/OJL/07/2021	8 Juli 2021 July 8, 2021	Kebijakan Sistem Pelaporan Pelanggaran (<i>Whistleblowing system</i>) Whistleblowing System Policy
46.	B.312/Dir.02.04/OJL/07/2021	8 Juli 2021 July 8, 2021	Buku Pedoman Ops Pengelolaan <i>Customer Information File</i> (CIF) Customer Information File (CIF) Management Ops Handbook
47.	B.314/Dir.02.04/OJL/07/2021	23 Juli 2021 July 23, 2021	Surat Keputusan tentang Pedoman Pelaksanaan Pemanfaatan Aplikasi PEP Decree on Guidelines for the Implementation of the Utilization of the PEP Application
48.	B.321/Dir.02.04/OPK/07/2021	26 Juli 2021 July 26, 2021	Pedoman Pelaksanaan Penyaluran Kredit Melalui Penyelenggara Layanan Pinjam Meminjam Uang Berbasis Teknologi <i>Fintech</i> Guidelines for the Implementation of Credit Distribution through Fintech Technology-Based Lending and Lending Service Providers
49.	B.322/Dir.02.04/JLN/07/2021	26 Juli 2021 July 26, 2021	Pengadaan Jasa Konsultan Hukum Rekanan Revisi Direksi BRI Agro Procurement of Legal Consultant Services for Partners Revision of the Board of Directors of BRI Agro
50.	B.324/Dir.02.04/OJL/07/2021	27 Juli 2021 July 27, 2021	Pedoman pelaksanaan pembentukan dan pengkinian <i>data cust</i> informasi <i>file</i> perorangan dengan menggunakan verifikasi data kependudukan dan pencatatan sipil Guidelines for implementing the establishment and updating of individual customer information file data using verification of population data and civil registration
51.	B.329/Dir.01.02/OJL/TI/07/2021	27 Juli 2021 July 27, 2021	Penetapan Tim Implementasi BI FAST <i>Payment System</i> Determination of the BI FAST Payment System Implementation Team
52.	B.331/Dir.02.04/JLN/07/2021	28 Juli 2021 July 28, 2021	Pedoman Pelaksanaan <i>Project Management</i> (Revisi) Direksi PT BRI Agro Guidelines for Implementing Project Management (Revised) Directors of PT BRI Agro
53.	B.332/Dir.02.04/OJL/ KOP/07/2021	28 Juli 2021 July 28, 2021	Pedoman Pelaksanaan Pengadaan Properti Direksi BRI Agro Guidelines for the Implementation of Property Procurement for Directors of BRI Agro
54.	B.333/Dir.02.04/OJL/ KOP/07/2021	28 Juli 2021 July 28, 2021	Penggunaan Aplikasi Jira dalam Pengelolaan <i>Strategic initiatives</i> dan <i>Project</i> Use of Jira Application in Management of Strategic Initiatives and Projects
55.	B.334/Dir.02.04/JLN/07/2021	28 Juli 2021 July 28, 2021	Pedoman Pelaksanaan Manajemen <i>Vendor</i> Revisi Direksi PT BRI Agro Guidelines for Implementing Vendor Management Revision of the Board of Directors of PT BRI Agro
56.	B.335/Dir.02.04/JLN/07/2021	28 Juli 2021 July 28, 2021	Implementasi Standar <i>Quick Response Code</i> untuk pembayaran revisi BRI Agro Implementation of the Quick Response Code Standard for BRI Agro revision payments
57.	B.336/Dir.02.04/OJL/07/2021	28 Juli 2021 July 28, 2021	Pedoman Pelaksanaan Pembayaran dan Pembukuan Biaya <i>Reimbursement</i> Guidelines for the Implementation of Payments and Bookkeeping of Reimbursement Fees
58.	B.345/Dir.01.02/OJL/ KOP/07/2021	28 Juli 2021 July 28, 2021	Penetapan komite pengarah teknologi sistem informasi determination of information systems technology steering committee
59.	B.347/Dir.02.04/OJL/ KOP/08/2021	3 Agustus 2021 August 3, 2021	Pedoman Pelaksanaan Implementasi Aplikasi Agropos Guidelines for the Implementation of the Agropos Application

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
60.	B. 348/Dir.02.04/OJL/ TSI/08/2021	3 Agustus 2021 August 3, 2021	Penetapan Komite <i>Deployment</i> Determination of the Deployment Committee
61.	B. 351/Dir.01.02/OJL/ TSI/08/2021	3 Agustus 2021 August 3, 2021	Penetapan komite teknologi sistem informasi Determination of information systems technology committee
62.	B. 353/Dir.01.02/CMG/08/2021	3 Agustus 2021 August 3, 2021	Pedoman pengadaan barang dan jasa revisi Revised guidelines for procurement of goods and services
63.	B. 354/Dir.01.02/CMG/08/2021	3 Agustus 2021 August 3, 2021	Migrasi rekening simpanan Savings account migration
64.	B. 358/dir.01.02/OJL/ FTR/08/2021	3 Ags 2021 August 3, 2021	Penetapan tim implementasi Bank Indonesia SISMONTAVAR Determination of the implementation team of Bank Indonesia SISMONTAVAR
65.	B. 359/Dir.01.04/OJL/08/2021	3 Ags 2021 August 3, 2021	Kebijakan sistem pelaporan pelanggaran (<i>whistleblowing system</i>) Whistleblowing system policy
66.	B. 360/DIR.01.04/OJL/08/2021	3 Ags 2021 August 3, 2021	Anti penyuapan dan pengendalian gratifikasi Anti-bribery and gratification control
67.	B. 363/Dir.01.02/OJL/08/2021	9 Ags 2021 August 9, 2021	Kebijakan anti penyuapan dan pengendalian gratifikasi Anti-bribery policy and gratification control
68.	B. 364/Dir.02.04/JLN/08/2021	9 Ags 2021 August 9, 2021	Pedoman pelaksanaan penelitian tingkat kesehatan bank berbasis risiko Guidelines for conducting risk-based bank soundness research
69.	B.375/Dir.01.03/HCP/ TML/08/2021	9 Ags 2021 August 9, 2021	Kebijakan komite MR MR komite committee policy
70.	B. 441/Dir.02.04/OJL/08/2021	18 Ags 2021 August 18, 2021	Pedoman Pelaksanaan Batasan Kewenangan Pengeluaran Biaya Guidelines for Implementing Limitations of Expense Authority
71.	B. 447/Dir.02.04/ojl/08/2021	18 Ags 2021 August 18, 2021	Kartu atm agrotama digital Digital agrotama atm card
72.	B. 460/Dir.01.02/OJL/08/2021	31 Ags 2021 August 31, 2021	Kebijakan komite manajemen risiko (<i>risk management committee</i>) Risk management committee policy
73.	R. 461/Dir.04/MNA/08/2021	31 Ags 2021 August 31, 2021	Penetapan Pengelolaan Account Divisi MNA Determination of MNA Division Account Management
74.	B. 462/Dir.01.03/SKAI/08/2021	31 Ags 2021 August 31, 2021	Penetapan Susunan Tim Pemenuhan Data Audit BPK RI Determination of the Composition of the RI BPK Audit Data Fulfillment Team
75.	B. 478A/Dir.04/DJS/09/2021	31 Ags 2021 August 31, 2021	Surat Penawaran Tabungan Infinity Infinity Savings Offer Letter
76.	B. 485/Dir. 01.04/OJL/09/2021	7 Sept 2021 September 7, 2021	Pedoman Pelaksanaan Perubahan Nama Nasabah Non Perorangan Pada Rekening Tabungan di <i>Core Banking BRI Agro</i> Guidelines for the Implementation of Changes in the Name of Non-Individual Customers in Savings Accounts in Core Banking BRI Agro
77.	B. 486/Dir. 01.04/OJL/09/2021	7 Sept 2021 September 7, 2021	Pedoman Pelaksanaan Perubahan Nama Nasabah Non Perorangan Pada Rekening Tabungan di <i>Core Banking BRI Agro</i> Guidelines for the Implementation of Changes in the Name of Non-Individual Customers in Savings Accounts in Core Banking BRI Agro
78.	B. 487/Dir. 01.04/OJL/09/2021	7 Sept 2021 September 7, 2021	Pedoman Pelaksanaan Perubahan Nama Nasabah Non Perorangan Pada Rekening Deposito di <i>Core Banking BRI Agro</i> Guidelines for the Implementation of Changes in the Name of Non-Individual Customers in Savings Accounts in Core Banking BRI Agro

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
79.	B.491.a/Dir.02/04/TI/ DSP/09/2021	7 Sept 2021 September 7, 2021	Revisi Tim <i>Agile Squad Super Apps</i> BRIA Digital Revision of BRIA Digital's Agile Squad Super Apps Team
80.	R. 503/Dir.04/MNA/09/2021	7 Sept 2021 September 7, 2021	Penetapan <i>Person In Change</i> Div MNA BRI Agro Determination of Person In Change Div MNA BRI Agro
81.	B. 507/Dir.02/KTR/AMK/09/2021	13 Sept 2021 September 13, 2021	Penyampaian Rencana Tindak Lanjut Pencapaian Target Implementasi Lap BI-Antasena Submission of the Follow-Up Plan for Achieving the BI-Antasena Lap Implementation Target
82.	B.508/Dir.04/DJS/09/2021	14 Sept 2021 September 14, 2021	Penawaran Tabungan Berencana ke BRI Agro Planned Savings Offer to BRI Agro
83.	B. 509/Dir.01.02/OJL/09/2021	14 Sept 2021 September 14, 2021	Pedoman pelaksanaan sistem manajemen anti penyuapan Anti-bribery management system implementation guidelines
84.	B. 512/Dir.02.04/OJL/ KTR/09/2021	14 Sept 2021 September 14, 2021	Pedoman Pelaksanaan <i>Asset and Liability Committee</i> Asset and Liability Committee Implementation Guidelines
85.	B. 526/Dir.02.04/OJL/09/2021	22 Sept 2021 September 22, 2021	Penetapan Kewenangan Flat Non Tunai Divisi HC Determination of Authority for Non-Cash Flat HC . Division
86.	B. 545Dir.02.04/OJL/10/2021	4 Oktober 2021 October 4, 2021	Penetapan kembali supervisi KCP Bekasi Reassignment of Bekasi KCP supervision
87.	B. 559/Dir.02.04/OJL/10/21	11 Oktober 2021 October 11, 2021	BRILINK
88.	B. 560/Dir.02.04/OJL/10/21	11 Oktober 2021 October 11, 2021	SK pedoman pelaksanaan pembentukan dan pengkinian data CIF SK guidelines for the establishment and updating of CIF data
89.	B. 566/Dir.02/SKP/10/2021	11 Oktober 2021 October 11, 2021	Surat Pengantar atas Perubahan dan atau Tambahan Informasi atas Pernyataan Pendaftaran (PUT) Kepada para Pemegang Saham Perseroan dalam Rangka Penerbitan Hak Memesan Efek (HMETD) PT BRI Agro Cover Letter for Changes and or Additional Information on Registration Statements (PUT) to Shareholders of the Company in the Context of Issuing Preemptive Rights (HMETD) PT BRI Agro
90.	B. 574/Dir.02.04/OJL/10/2021	21 Oktober 2021 October 21, 2021	Pedoman Pelaksanaan Pembentukan Data <i>Customer Information File</i> CIF dengan Menggunakan <i>Fitur Quick Opening</i> Guidelines for the Implementation of Formation of CIF Customer Information File Data by Using the Quick Opening Feature
91.	B. 582/Dir.02.04/HCP/ OJL/10/2021	27 Oktober 2021 October 27, 2021	Pedoman Pelaksanaan Pengelolaan Mesin ATM Direksi BRI Agro Guidelines for the Implementation of BRI Agro Directors' ATM Machine Management
92.	B 583/ Dir.02.04/OJL/10/2021	29 Oktober 2021 October 29, 2021	SK Pedoman Pelaksanaan Sistem Manajemen Mutu SK Guidelines for the Implementation of Quality Management System
93.	B 584/ Dir.02.04/OJL/10/2021	29 Oktober 2021 October 29, 2021	SK Buku Pedoman Anti <i>Money Laundering</i> (dalam proses) SK Anti Money Laundering Manual (in progress)
94.	B. 585/Dir.02.04/OJL/10/2021	29 Oktober 2021 October 29, 2021	Kebijakan Penerapan Tata Kelola Perusahaan yang Baik (<i>Good Corporate Governance</i>) Policy on the Implementation of Good Corporate Governance

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
95.	B. 586/Dir.02/OJL/JLN/10/2021	29 Oktober 2021 October 29, 2021	Surat Kuasa KC Balikpapan di BI Power of Attorney for Balikpapan Branch Office at BI
96.	B. 592/Dir.02.04/OJL/11/2021	29 Oktober 2021 October 29, 2021	Pedoman Pelaksanaan Penilaian Penerapan Tata Kelola Perusahaan yang Baik (<i>Good Corporate Governance</i>) di Setiap Unit Kerja Guidelines for the Implementation of Good Corporate Governance Implementation Assessment in Every Work Unit
97.	B. 616/Dir.01.02/OJL/11/2021	2 Nov 2021 November 2, 2021	Kebijakan kode etik bank Bank code of ethics policy
98.	B. 634/Dir.01.05/OJL/11/2021	2 Nov 2021 November 2, 2021	Kebijakan pengelolaan risiko produk bank baru New bank product risk management policy
99.	B. 655/Dir.01.04/DJS/12/2021	9 Des 2021 December 9, 2021	SK Tim <i>Strategic initiative retain casa abd term deposit <6%</i> SK Strategic initiative team retain casa abd term deposit <6%
100.	B. 656/Dir.01.04/RAC/2021	10 Des 2021 December 10, 2021	Robust <i>scoring model</i> Robust scoring model
101.	B. 659/Dir.01.02/SKP/12/2021	10 Des 2021 December 10, 2021	TIM RI PT Bank Raya Indonesia RI TEAM PT Bank Raya Indonesia
102.	B. 660/Dir.01.02/TSI/12/2021	14 Des 2021 December 14, 2021	SK Tim <i>Fraud Detection System</i> SK Fraud Detection System Team
103.	B. 661/Dir.01.02/TSI/12/2021	14 Des 2021 December 14, 2021	SK <i>Virtual Private cloud</i> SK Virtual Private cloud
104.	B. 662/Dir.01.02/TSI/12/2021	14 Des 2021 December 14, 2021	SK Tim <i>Big data & business intelligence implementation</i> SK Big data & business intelligence implementation team
105.	B. 663/Dir.01.02/TSI/12/2021	14 Des 2021 December 14, 2021	SK Tim <i>Data Center Enhancement</i> SK Data Center Enhancement Team
106.	B. 664/Dir.01.02/TSI/12/2021	14 Des 2021 14 December 2021	SK Tim <i>Payment gateway platform implementation</i> SK Team Payment gateway platform implementation
107.	B.665/Dir.01.04/MNA/BMH/12/2021	14 Des 2021 December 14, 2021	SK Tim SI <i>revamp</i> portofolio pinjaman divisi MNA SK Team SI revamp loan portfolio MNA division
108.	B. 666/Dir.04.02/OJL/TSI/12/2021	16 Des 2021 December 16, 2021	SK Pedoman Pelaksanaan Perencanaan Kapasitas Sumber Daya Divisi TI Bank Raya SK Guidelines for Implementing Resource Capacity Planning for Bank Raya IT Division
109.	B.669/Dir.02.04/OJL/LCA/12/2021	16 Des 2021 December 16, 2021	Pedoman Pelaksanaan Sistem Manajemen Anti Penyuapan Guidelines for the Implementation of Anti-Bribery Management System
110.	B.670/Dir.02.04/OJL/LCA/12/2021	16 Des 2021 December 16, 2021	SK tentang Pedoman Pelaksanaan Sistem Manajemen Mutu PT Bank Raya Indonesia Decree concerning Guidelines for the Implementation of PT Bank Raya Indonesia's Quality Management System

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
111.	B. 683/Dir.01.02/OJL/12/21	20 Desember 21 December 20, 2021	penetapan SK tim implementasi sistem BI <i>Fast Payment</i> determination of the BI Fast Payment system implementation team decree
112.	B. 684/Dir.01.02/KTR/12/21	20 Desember 21 December 20, 2021	Otomasi <i>worksheet</i> Keu Bank Raya Automatic worksheet Keu Raya Bank
113.	B. 687/Dir.01.04/RC/12/21	20 Desember 21 December 20, 2021	SK TIM OMS SK TEAM OMS
114.	B. 689/Dir.01.04/RAC/12/2021	20 Desember 21 December 20, 2021	Penetapan SK Tim <i>Robust Scoring Model</i> Determination of SK Robust Scoring Model Team
115.	B. 690/Dir.01.04/RAC/12/2021	20 Desember 21 December 20, 2021	Pinang Ritel <i>Feature Enhancement & Monitoring Dashboard</i> Pinang Retail Feature Enhancement & Monitoring Dashboard
116.	B. 691/Dir.01.04/RAC/12/2021	20 Desember 21 December 20, 2021	Penetapan SK Tim <i>Striking Potential Partner Through Super Aggregator</i> and <i>Expand Supplier Ecosystem</i> Determination of SK Striking Team Potential Partner Through Super Aggregator and Expand Supplier Ecosystem
117.	B. 694/Dir.01.04/DJS/12/2021	20 Desember 21 December 20, 2021	Penetapan SK Tim <i>Retain CASA & Term Deposit <6%</i> Determination of SK Retain Team CASA & Term Deposit <6%
118.	B. 695/Dir.04.02/SKP/ OJL/12/2021	23 Des 2021 December 23, 2021	Pedoman Pelaksanaan Kode Korespondensi Direksi PT Bank Raya Indonesia Guidelines for Implementing Correspondence Code for the Board of Directors of PT Bank Raya Indonesia
119.	R. 696/Dir.03.04/HCP/ TML/12/2021	23 Des 2021 December 23, 2021	Mutasi Pekerja Direksi Bank Raya Indonesia Transfer of Employees of Bank Raya Indonesia's Directors
120.	B. 697/Dir.01.04/RPK/12/2021	23 Des 2021 December 23, 2021	Penetapan SK TIM <i>Optimalisasi Recovery</i> Determination of SK TEAM Recovery Optimization
121.	B. 698/Dir.01.02/TSI/12/2021	23 Des 2021 December 23, 2021	Penetapan SK Tim <i>Fraud Detection System</i> Determination of SK Fraud Detection System Team
122.	B. 699/Dir.01.02/TSI/12/2021	23 Des 2021 December 23, 2021	Penetapan SK Tim <i>Big Data & Business Intelligence Implementation</i> Determination of SK Big Data & Business Intelligence Implementation Team
123.	B. 700/Dir.01.02/TSI/12/2021	23 Des 2021 December 23, 2021	Penetapan SK Tim <i>Virtual Private Cloud</i> Determination of SK Virtual Private Cloud Team
124.	B. 701Dir.01.02/TSI/12/2021	23 Des 2021 December 23, 2021	Penetapan SK Tim <i>Data Center Enhancement</i> Determination of SK Data Center Enhancement Team
125.	B. 702/Dir.01.02/TSI/12/2021	23 Des 2021 December 23, 2021	Penetapan SK Tim <i>Payment Gateway Platform Implementation</i> Determination of SK Payment Gateway Platform Implementation Team
126.	B. 709.A/Dir.01.02/RPK/12/2021	28 Des 2021 December 28, 2021	Penetapan SK <i>Tribe "Legacy"</i> Determination of SK Tribe "Legacy"

No	No. Keputusan No. Decision	Tanggal Date	Perihal Matters
127.	B. 711/Dir.01.05/DOP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim Omni <i>Channel Contact Center</i> Determination of SK Omni Channel Contact Center Team
128.	B.713/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim Pinang <i>For Brilink/Keagenan</i> Determination of SK Pinang Team For Brilink/Agency
129.	B.714/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim Pinang Payment Determination of the Pinang Payment Team SK
130.	B. 715/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tribe Pinang Determination of the SK Tribe Pinang
131.	B. 716/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tribe RAYA Determination of SK Tribe RAYA
132.	R. 722/Dir.01.03/HCP/ TML/12/2021	28 Des 2021 December 28, 2021	Pengangkatan peserta BFLP sbg pekerja tetap Appointment of BFLP participants as permanent workers
133.	B.725/Dir.01.05/BWI/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tribe National Sales Determination of SK Tribe National Sales
134.	B. 749/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim <i>Direct Debit</i> Determination of SK Direct Debit Team
135.	B. 750/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim <i>Acquiring Host</i> Determination of the SK of the Acquiring Host Team
136.	B. 751/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim Pengembangan Cams & Integrasi Visa Determination of SK Cams Development & Visa Integration Team
137.	B. 752/Dir.01.05/DSP/12/2021	28 Des 2021 December 28, 2021	Penetapan SK Tim <i>Open API</i> Determination of SK Open API Team

Pelatihan dan Peningkatan Kompetensi Direksi

Training and Development of the Board of Directors' Competencies

Untuk menunjang Direksi dalam melaksanakan tugas dan tanggung jawabnya, Bank Raya memberikan kesempatan kepada anggota Direksi untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal Bank atau yang diselenggarakan oleh pihak eksternal.

Sepanjang tahun 2021, anggota Direksi Bank Raya telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

Bank Raya offers opportunities for members of the Board of Directors to engage in training and competence development programmes, whether conducted by the Bank or by third parties, to assist them in carrying out their duties and obligations.

Members of Bank Raya's Board of Directors participated in the following training and competence development programmes during 2021:

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organizer	Waktu dan Tempat Time and place
Arif Wicaksono	Dir Keuangan dan Operasional Director of Finance and Operations	Uji Sertifikasi <i>Treasury Level Advance</i> Advance Level Treasury Certification Test	LSPP	15 Februari 2021 February 15, 2021
Arif Wicaksono	Dir Keuangan dan Operasional Director of Finance and Operations	Pendidikan Pembekalan Sertifikasi <i>Treasury</i> Treasury Certification Training	FKDKP	1 Maret 2021 March 1, 2021
Arif Wicaksono	Dir Keuangan dan Operasional Director of Finance and Operations	Pendidikan Uji Sertifikasi <i>Treasury</i> Treasury Certification Test Education	LSPP	1 Maret 2021 March 1, 2021
Ernawan	Dir ERM, Compliance & Human Resource Director of ERM, Compliance & Human Resources	Efektivitas Pengawasan Dewan Komisaris dalam Menjaga Kepatuhan Bank dalam Menuju Era Pengaturan <i>Principle Based</i> The Effectiveness of Supervision of the Board of Commissioners in Maintaining Bank Compliance in Towards the Era of Principle Based Regulation	FKDKP	25 Maret 2021 March 25, 2021
Sigit Murtiyoso	Dir. Retail Agri & Pendanaan Director of Agri Retail & Funding	<i>Risk Management Refreshment Program: Strategi Cerdas Pengelolaan Risiko Kredit & Risiko Operasional di Masa Pandemi Covid 19</i> Risk Management Refreshment Program: Smart Strategy for Credit Risk Management & Operational Risk during the Covid 19 Pandemic	IBI - BCC	7 April 2021 April 7, 2021
Arif Wicaksono	Dir Keuangan dan Operasional Director of Finance and Operations	<i>Workshop: How Does The Year 2021 Look Like for the Wealth Management Industry?</i>	CWMA	16 April 2021, 4 Mei dan 8 Juni 2021 April 16, 2021, May 4, and June 8, 2021
Bhimo Wikan Hantoro	Dir. Digital Business Director of Digital Business	Sertifikasi Manajemen Risiko Risk Management Certification	BSMR	19 April 2021 April 19, 2021

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organizer	Waktu dan Tempat Time and place
Ernawan	Dir ERM, Compliance & Human Resource Director of ERM, Compliance & Human Resources	Webinar Legal and Compliance Aspect in Fraud Risk Management	PT Pendidikan Maritim dan Logistik Indonesia	23 Juni 2021 June 23, 2021
Sigit Murtiyoso	Dir. Retail Agri & Pendanaan Director of Agri Retail & Funding	Refreshment Sertifikasi Manajemen Risiko Level 5 Refreshment Risk Management Certification Level 5	Efektifpro	14 Juli 2021 July 14, 2021
Ernawan	Dir ERM, Compliance & Human Resource Director of ERM, Compliance & Human Resources	Webinar Pencegahan Korupsi dengan Metode Judgement Corruption Prevention Webinar with Judgment Method	Visi Integritas Integrity Vision	27 Agustus 2021 August 27, 2021
Ernawan	Dir ERM, Compliance & Human Resource Director of ERM, Compliance & Human Resources	Pembekalan Sertifikasi Kepatuhan Provision of Compliance Certification	FKDKP	23 - 24 September 2021 September 23-24, 2021
Bhimo Wikan Hantoro	Dir. Digital Business Director of Digital Business	Pendidikan Refreshment Bank Executive Overview Education Refreshment Bank Executive Overview	LPPI	21-22 Oktober 2021 & 9-10 November 2021 October 21-22, 2021 & November 9-10, 2021
Arif Wicaksono	Dir Keuangan dan Operasional Director of Finance and Operations	Benchmarking Program SESPIBANK Angkatan 72 SESPIBANK Program Benchmarking Batch 72	LPPI	19 November - 3 Desember 2021 November 19 - December 3, 2021

Penilaian Kinerja Komite dan Unit Kerja yang Berada di Bawah Direksi

Evaluation of the Performance of the Committees Reporting to the Board of Directors

Dalam melaksanakan tugas kepengurusannya, Direksi membentuk komite-komite di bawah Direksi sesuai dengan kebutuhan bisnis Perseroan dan ketentuan regulasi, yang diharapkan dapat menciptakan efektivitas dan efisiensi operasional antara lain Komite Manajemen Risiko, Komite ALCO, Komite Kebijakan Perkreditan, Komite Kebijakan Kredit dan Pengembangan Produk, Komite Pengarah Teknologi Informasi dan Komite Kredit.

Direksi menilai bahwa kinerja komite-komite tersebut telah menjalankan tugas dan tanggung jawabnya dengan baik dan efektif.

The Board of Directors establishes committees to undertake its management responsibilities in accordance with the Company's business needs and regulatory requirements, with the goal of increasing operational effectiveness and efficiency. These committees include the Risk Management Committee, ALCO Committee, Credit Policy Committee, Credit Policy and Product Development Committee, Information Technology Steering Committee, and Credit Committee.

The Board of Directors believes that these committees have performed their functions and responsibilities successfully and efficiently.

Penilaian Kinerja Direksi Performance Evaluation of the Board of Directors

Berdasarkan Undang-undang No. 40 tahun 2007 tentang Perseroan terbatas diatur bahwa dalam hal Direksi terdiri dari 2 (dua) anggota Direksi atau lebih maka tanggung jawab Direksi berlaku secara tanggung renteng.

Penilaian Kinerja oleh Pemegang saham

Sebagai bentuk akuntabilitas Perseroan, Direksi akan dievaluasi setiap tahunnya oleh Dewan Komisaris untuk disampaikan kepada Pemegang Saham berdasarkan hasil kinerja keseluruhan dari tugas dan kewajiban Direksi secara kolegal. Hal ini menjadi salah satu bahan pertimbangan bagi Pemegang Saham untuk memberhentikan dan/atau menunjuk kembali anggota Direksi.

Kriteria Evaluasi Kinerja Direksi

Pemegang Saham menetapkan kriteria kinerja Direksi secara kolegal. Kriteria evaluasi kinerja anggota Direksi antara lain meliputi:

1. Tingkat kehadiran dalam rapat Direksi maupun rapat Koordinasi Direksi dengan Komisaris.
2. Pertumbuhan kinerja keuangan
3. Pertumbuhan jumlah nasabah dan pengukuran kepuasan nasabah
4. Penerapan tata Kelola perusahaan yang Baik
5. Pengelolaan Sumber Daya Manusia
6. Pengelolaan manajemen risiko
7. Ketaatan terhadap peraturan perundang-undangan yang berlaku dan kebijakan perusahaan.
8. Komitmennya terhadap keputusan bersama yang telah dibuat.

Sebagaimana di dalam pedoman kerja Direksi juga disebutkan akan kriteria penilaian untuk Direksi diukur berdasarkan 4 (empat) aspek yaitu:

1. Keuangan dan pasar
2. Fokus pelanggan
3. Efektivitas produk dan proses
4. Kepemimpinan, tata Kelola dan tanggung Jawab Kemasyarakatan

Prosedur Pelaksanaan Assessment Kinerja Direksi

Self-assessment atau penilaian sendiri dimaksud dilakukan oleh masing-masing anggota Direksi untuk menilai pelaksanaan kinerja Direksi secara kolegal, dan bukan menilai kinerja individual masing-masing anggota Direksi. Dengan adanya *self assessment* ini diharapkan masing-masing anggota Direksi dapat berkontribusi untuk memperbaiki kinerja Direksi secara berkesinambungan.

According to Law No. 40 of 2007 regulating Limited Liability Companies, if the Board of Directors consists of two (two) or more members, the Board of Directors' obligations apply jointly and severally.

Evaluation of Board of Directors by Shareholders

As a means of ensuring the Company's responsibility, the Board of Directors will be assessed yearly by the Board of Commissioners and the results will be presented to the Shareholders based on the Board of Directors' overall performance of its responsibilities and obligations collegially. This becomes one of the factors that Shareholders evaluate when deciding whether to remove or reappoint members of the Board of Directors.

Criteria for Evaluating the Performance of the Board of Directors

Collaboratively, shareholders establish the performance requirements for the Board of Directors. The following factors are used to evaluate the performance of Board of Directors members:

1. The level of attendance at Board of Directors meetings and Board of Directors-Board of Commissioners coordination meetings
2. Increased financial performance
3. Customer growth and satisfaction measurement
4. Adherence to sound corporate governance
5. Human Resource Administration
6. Risk mitigation
7. Adherence to relevant rules and regulations, as well as corporate policies.
8. His devotion to the conclusions reached in collaboration.

As stated in the Board of Directors' work standards, the evaluation criteria for the Board of Directors are based on four (four) factors, namely:

1. Financial markets and finance
2. A commitment to the customer
3. Effectiveness of products and processes
4. Community Leadership, Governance, and Responsibilities

Procedure for Conducting the Board of Directors' Performance Evaluation

The self-assessment is intended to be completed by each member of the Board of Directors in order to evaluate the Board's performance collectively, not in order to evaluate each member's individual performance. With this self-assessment, it is intended that each member of the Board of Directors may contribute to the Board of Directors' continual performance improvement.

Direksi mengisi lembar formulir penilaian kinerja untuk dievaluasi oleh Dewan Komisaris dan Komite Remunerasi dan Nominasi kemudian hasilnya akan dilaporkan kepada Pemegang Saham.

The Board of Directors completes a performance assessment form, which is subsequently examined by the Board of Commissioners and the Remuneration and Nomination Committee, with the findings being communicated to Shareholders.

Pihak Yang Melakukan Assessment

Pihak yang melakukan penilaian kinerja Direksi adalah *self-assessment* dengan persetujuan Dewan Komisaris dan dilaporkan kepada Pemegang Saham pengendali.

The Assuror

The party responsible for evaluating the Board of Directors' performance is a self-evaluation approved by the Board of Commissioners and submitted to the controlling shareholder.

Hasil Penilaian Kinerja Direksi

Sepanjang tahun 2021, Direksi Bank Raya telah menetapkan target atau KPI untuk pencapaian sebagai berikut:

Results of the Board of Directors' Performance Evaluation

Throughout 2021, Bank Raya's Board of Directors has established objectives or key performance indicators for the following accomplishments:

Aspek Aspect	Sasaran Strategis Strategic target	KPI KPI	Bobot KPI KPI Score Standard	Pencapaian Achievement	Nilai Score
Keuangan dan Pasar Finance and Markets	F1. Peningkatan Profitabilitas Perusahaan Increasing Company Profitability	1. <i>Cost of Fund (%)</i> Cost of Funds (%)	5,0%	111,35%	5,5%
		2. Dana Pihak Ketiga Third-party funds	5,0%	100,71%	5,0%
		3. % CASA	5,0%	119,07%	5,5%
		4. <i>NPL Management</i>	10,0%	110,2%	11%
		5. <i>NPL Coverage (%)</i>	5,0%	129,06%	5,5%
		6. <i>Rp. Recovery & Remedy</i>	15,0%	100,99%	15,15%
Fokus Pelanggan Customer Focus	C1. Peningkatan Kepuasan Pelanggan Improved Customer Satisfaction	7. <i>Net Promoter Score</i>	5,0%	180,89%	5,5%
		8. <i>Jumlah NoA Digital Saving</i>	5,0%	134,74%	5,5%
Efektivitas Produk dan Proses Product and Process Effectiveness	P1. Implementasi Inisiatif Strategis BRI Agro Implementation of BRI Agro's Strategic Initiatives	9. Pengembangan <i>New Business Model (Digital Agri & Beyond)</i> New Business Model Development (Digital Agri & Beyond)	20,0%	100,00%	20,00%
		10. Implementasi <i>Strategic Initiative Revamp</i> Implementation of Strategic Initiative Revamp	15,0%	99,86%	14,98%
		11. Implementasi <i>Strategic Initiative Carry Over</i> Implementation of Strategic Initiative Carry Over	5,0%	98,93%	4,95%

Aspek Aspect	Sasaran Strategis Strategic target	KPI KPI	Bobot KPI KPI Score Standard	Pencapaian Achievement	Nilai Score
Kepemimpinan, Tata Kelola & Tanggung Jawab Kemasyarakatan Leadership, Governance & Community Responsibility	K1. Penguatan <i>Good Corporate Governance</i> Strengthening Good Corporate Governance	12. Skor GCG dan Profil Risiko GCG Score and Risk Profile	5,0%	100,00%	5,0%
Total			100%		103,57%

Penilaian Kinerja Berdasarkan Assessment GCG Aspek Direksi

Penilaian kinerja Direksi juga dilakukan dengan menggunakan metode penilaian sendiri (*self-assessment*) sesuai SEOJK Nomor 13/SEOJK.03/2017 tahun 2017 perihal penerapan tata Kelola Bagi Bank Umum.

Prosedur Pelaksanaan Self-Assessment GCG Terkait Kinerja Direksi

Direksi melakukan *self-assessment* atas kinerjanya selama satu tahun atas pengelolaan Perseroan, pencapaian target, upaya penanggulangan kendala dan manajemen risiko serta penerapan tata kelola perusahaan yang dilakukan. Dewan komisaris akan mengevaluasi melalui rapat dengan Komite Remunerasi dan Nominasi kemudian hasilnya akan dilaporkan kepada Pemegang Saham dalam RUPS tahunan.

Hasil Penilaian Kinerja Direksi Tahun 2021

GCG Assessment of Performance Aspects of the Board of Directors

The Board of Directors' performance is also evaluated via a self-assessment process in line with SEOJK Number 13/SEOJK.03/2017 of 2017 on the implementation of Good Corporate Governance for Commercial Banks.

GCG Self-Assessment Implementation Procedures for the Board of Directors' Performance

The Board of Directors undertakes an annual self-assessment of its effectiveness in managing the Company, achieving objectives, overcoming barriers, risk management, and implementing sound corporate governance. The board of commissioners will conduct an evaluation in conjunction with the Remuneration and Nomination Committee, and the conclusions will be communicated to shareholders at the annual GMS.

The Assessment of the Board of Directors' Performance in 2021

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
A. Governance Structure		
1.	Jumlah Anggota Direksi paling sedikit 3 (tiga) orang.	Jumlah Anggota Direksi Bank Raya (sebelumnya bernama PT Bank Rakyat Indonesia Agroniaga, Tbk {BRI AGRO}), telah berganti nama menjadi PT Bank Raya Indonesia, Tbk {BANK RAYA} dan telah disetujui oleh OJK dengan Salinan Keputusan Deputi Komisioner Pengawas Perbankan I Otoritas Jasa Keuangan No. KEP-65/PB.I/2021 tanggal 1 November 2021 tentang Penetapan Penggunaan Izin usaha atas nama Bank Rakyat Indonesia Agroniaga Tbk menjadi Izin Usaha atas nama PT Bank Raya Indonesia Tbk dan sebagaimana tercantum dalam akta pernyataan keputusan rapat No.24 Tanggal 27 September 2021 yang isinya antara lain "Menyetujui perubahan nama Perseroan semula bernama PT Bank Rakyat Indonesia Agroniaga, Tbk dengan nama komersial "BRI AGRO" menjadi bernama PT Bank Raya Indonesia, Tbk, dengan nama komersial "BANK RAYA") sebanyak 5 (lima) orang.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis												
		Hal ini telah sesuai dengan ketentuan di bawah ini : 1) POJK No.55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola bagi Bank Umum juncto Surat Keputusan Direksi Bank Raya No.Kpts.B.32/Dir.01.03/KMRH/IX/2017 tanggal 28 September 2017 tentang Kebijakan Penerapan Tata Kelola Perusahaan yang Baik; 2) Surat Keputusan Direksi BRI AGRO (telah berganti nama menjadi BANK RAYA) No.Kpts B.585/Dir.02.04/OJL/10/2021 tanggal 29 Oktober 2021 tentang Tata Kelola Perusahaan Yang Baik. 3) Surat Keputusan Direksi Bank BRI AGRO (telah berganti nama menjadi BANK RAYA) No.Kpts B.237/Dir.04.02/CMG/06/2021 tanggal 11 Juni 2021 tentang Penetapan Kembali Struktur Organisasi PT Bank Raya Indonesia, Tbk. Berikut merupakan susunan Direksi BANK RAYA berdasarkan hasil Keputusan RUPS Tahunan yang dituangkan dalam Akta Keputusan Rapat No. 14 tanggal 19 April 2021 dibuat dihadapan M. Nova Faisal, SH. M.Kn., Notaris di Jakarta yang memutuskan Bpk Ebeneser Girsang dan Bpk Herry Prayudi diberhentikan secara hormat dan melakukan perubahan susunan kepengurusan perseroan secara keseluruhan, khusus untuk Direksi, sebagai berikut : <table><tr><th>Nama</th><th>Jabatan</th></tr><tr><td>Kaspar Situmorang</td><td>Direktur Utama</td></tr><tr><td>Arif Wicaksono</td><td>Direktur Keuangan & Operasional</td></tr><tr><td>Ernawan</td><td>Direktur <i>Enterprise Risk, Compliance & Human Resource</i></td></tr><tr><td>Sigit Murtiyoso</td><td>Direktur Retail Agri & Pendanaan</td></tr><tr><td>Bhimo Wikan Hantoro</td><td>Direktur Digital Bisnis</td></tr></table> The number of members of the Board of Directors is at least 3 (three) people. The number of members of the Board of Directors of Bank Raya (formerly PT Bank Rayat Indonesia Agroniaga, Tbk {BRI AGRO}, has changed its name to PT Bank Raya Indonesia, Tbk {BANK RAYA} and has been approved by OJK with a copy of the Decree of the Deputy Commissioner for Banking Supervision I of the Financial Services Authority No. KEP-65/PB.I/2021 dated November 1, 2021 regarding the stipulation of the use of a business license on behalf of Bank Rakyat Indonesia Agroniaga Tbk to become a business license on behalf of PT Bank Raya Indonesia Tbk and as stated in the deed of statement of meeting decisions No.24 dated September 27, 2021, which includes, among other things, "Approved the change of the name of the Company, originally named PT Bank Rakyat Indonesia Agroniaga, Tbk with the commercial name "BRI AGRO" to become PT Bank Raya Indonesia, Tbk, with the commercial name "BANK RAYA") as many as 5 (five) people. This is in accordance with the conditions below: 1) POJK No.55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks in conjunction with the Decree of the Board of Directors of Bank Raya No.Kpts.B.32/Dir.01.03/KMRH/IX/2017 dated September 28, 2017 concerning Policy Implementation of Good Corporate Governance; 2) Decree of the Board of Directors of BRI AGRO (has changed its name to BANK RAYA) No. Kpts B.585/Dir.02.04/OJL/10/2021 dated October 29, 2021 regarding Good Corporate Governance. 3) Decree of the Board of Directors of Bank BRI AGRO (has changed its name to BANK RAYA) No. Kpts B.237/Dir.04.02/CMG/06/2021 dated June 11, 2021 concerning Re-determination of the Organizational Structure of PT Bank Raya Indonesia, Tbk.	Nama	Jabatan	Kaspar Situmorang	Direktur Utama	Arif Wicaksono	Direktur Keuangan & Operasional	Ernawan	Direktur <i>Enterprise Risk, Compliance & Human Resource</i>	Sigit Murtiyoso	Direktur Retail Agri & Pendanaan	Bhimo Wikan Hantoro	Direktur Digital Bisnis
Nama	Jabatan													
Kaspar Situmorang	Direktur Utama													
Arif Wicaksono	Direktur Keuangan & Operasional													
Ernawan	Direktur <i>Enterprise Risk, Compliance & Human Resource</i>													
Sigit Murtiyoso	Direktur Retail Agri & Pendanaan													
Bhimo Wikan Hantoro	Direktur Digital Bisnis													

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis												
		The following is the composition of the Board of Directors of BANK RAYA based on the resolutions of the Annual GMS as outlined in the Deed of Meeting Resolution No. 14 dated April 19, 2021, made before M. Nova Faisal, SH. M.Kn., Notary in Jakarta who decided that Mr. Ebeneser Girsang and Mr. Herry Prayudi were honorably dismissed and made changes to the management structure of the company as a whole, specifically for the Board of Directors, as follows: <table><tr><th>Name</th><th>Position</th></tr><tr><td>Kaspar Situmorang</td><td>President director</td></tr><tr><td>Arif Wicaksono</td><td>Director of Finance & Operations</td></tr><tr><td>Ernawan</td><td>Director of Enterprise Risk, Compliance & Human Resources</td></tr><tr><td>Sigit Murtiyoso</td><td>Director of Retail Agri & Funding</td></tr><tr><td>Bhimo Wikan Hantoro</td><td>Director of Digital Business</td></tr></table>	Name	Position	Kaspar Situmorang	President director	Arif Wicaksono	Director of Finance & Operations	Ernawan	Director of Enterprise Risk, Compliance & Human Resources	Sigit Murtiyoso	Director of Retail Agri & Funding	Bhimo Wikan Hantoro	Director of Digital Business
Name	Position													
Kaspar Situmorang	President director													
Arif Wicaksono	Director of Finance & Operations													
Ernawan	Director of Enterprise Risk, Compliance & Human Resources													
Sigit Murtiyoso	Director of Retail Agri & Funding													
Bhimo Wikan Hantoro	Director of Digital Business													
2.	Seluruh Anggota Direksi telah berdomisili di Indonesia.	Ya, seluruh Anggota Direksi berdomisili di Indonesia.												
	All members of the Board of Directors are domiciled in Indonesia.	Yes, all members of the Board of Directors are domiciled in Indonesia.												
3.	Mayoritas Anggota Direksi telah memiliki pengalaman paling sedikit 5 (lima) tahun di bidang operasional sebagai Pejabat Eksekutif Bank.	Ya, 3 Anggota Direksi telah memiliki pengalaman lebih dari 5 (lima) tahun di bidang operasional sebagai pejabat Eksekutif Bank, sedangkan untuk Direksi atas nama Kaspar Situmorang dan Bhimo Wikan Hantoro telah lulus <i>fit & proper test</i> , meskipun belum memiliki pengalaman selama 5 tahun sebagai pejabat eksekutif, tetapi berdasarkan rekomendasi dari KRN (Komite Remunerasi Dan Nominasi), pada tanggal 5 April 2021, yang bersangkutan dapat menjabat sebagai anggota Direksi.												
	The majority of the members of the Board of Directors have at least 5 (five) years of experience in the operational field as Bank Executive Officers.	Yes, 3 members of the Board of Directors have more than 5 (five) years of experience in the operational field as Bank Executive officers, while the Directors on behalf of Kaspar Situmorang and Bhimo Wikan Hantoro have passed the fit & proper test, although they do not have 5 years of experience as an official. executive, but based on a recommendation from the KRN (Remuneration and Nomination Committee), on April 5, 2021, the person concerned may serve as a member of the Board of Directors.												
4.	Anggota Direksi tidak merangkap jabatan sebagai Anggota Direksi, Anggota Dewan Komisaris, atau Pejabat Eksekutif pada Bank, Perusahaan, dan/atau Lembaga lain kecuali terhadap hal yang telah ditetapkan dalam POJK Tata Kelola Bank Umum yaitu menjadi Dewan Komisaris dalam rangka melaksanakan tugas Pengawasan atas penyertaan pada Perusahaan Anak bukan bank yang dikendalikan oleh Bank.	Ya, Anggota Direksi tidak memiliki rangkap jabatan sebagai Komisaris, Direksi atau Pejabat Eksekutif pada Bank, Perusahaan dan atau Lembaga lain. Hal ini sesuai dengan Surat Pernyataan masing-masing anggota Direksi pada saat mengikuti <i>fit & proper test</i> di OJK.												
	Members of the Board of Directors do not hold concurrent positions as Members of the Board of Directors, Member of the Board of Commissioners, or Executive Officers in other Banks, Companies, and/or Institutions except for matters that have been stipulated in the POJK for Governance of Commercial Banks, namely becoming the Board of Commissioners in order to carry out the task of Supervision of investment in Subsidiary Company is not a bank controlled by the Bank.	Yes, members of the Board of Directors do not have concurrent positions as Commissioners, Directors or Executive Officers in other Banks, Companies and or Institutions. This is in accordance with the Statement Letter of each member of the Board of Directors when participating in the fit & proper test at OJK.												

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
5.	Anggota Direksi baik secara sendiri-sendiri maupun secara bersama-sama tidak memiliki Saham melebihi 25% (dua puluh lima persen) dari modal disetor pada suatu Perusahaan lain. Members of the Board of Directors, either individually or jointly, do not own shares of more than 25% (twenty five percent) of the paid-up capital in another company.	Ya, Anggota Direksi baik secara sendiri-sendiri atau bersama-sama tidak memiliki saham melebihi 25% (dua puluh lima persen) dari modal disetor pada suatu Perusahaan lain. Hal ini sesuai dengan Surat Pernyataan masing-masing Direksi pada saat mengikuti <i>fit & proper test</i> di OJK. Yes, the members of the Board of Directors either individually or jointly do not own shares exceeding 25% (twenty five percent) of the paid-up capital in another company. This is in accordance with the Statement Letter of each Board of Directors when participating in the <i>fit & proper test</i> at OJK.
6.	Mayoritas Anggota Direksi tidak saling memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama Anggota Direksi dan/atau dengan Anggota Dewan Komisaris. The majority of the members of the Board of Directors do not have family relationships up to the second degree with fellow members of the Board of Directors and/or with members of the Board of Commissioners.	Ya, seluruh Direksi tidak memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama Anggota Direksi dan/atau dengan Anggota Dewan Komisaris. Hal ini sesuai dengan Surat Pernyataan Direksi pada saat mengikuti <i>fit & proper test</i> di OJK. Yes, all members of the Board of Directors do not have family relationships up to the second degree with fellow members of the Board of Directors and/or with members of the Board of Commissioners. This is in accordance with the Statement of the Board of Directors when participating in the <i>fit & proper test</i> at OJK.
7.	Penggantian dan/atau pengangkatan Anggota Direksi telah memperhatikan Rekomendasi Komite Nominasi atau Komite Remunerasi dan Nominasi. The replacement and/or appointment of members of the Board of Directors has taken into account the recommendations of the Nomination Committee or the Remuneration and Nomination Committee.	Ya, penggantian dan/atau pengangkatan Anggota Direksi telah memperoleh Rekomendasi Komite Nominasi atau Komite Remunerasi dan Nominasi sebagaimana tercantum dalam Risalah Rapat Komite Remunerasi dan Nominasi No. 07/NR-KRN/IV/2021 ; No. 23/SDK-IV/2021 tanggal 5 April 2021. Yes, the replacement and/or appointment of members of the Board of Directors has obtained a Recommendation from the Nomination Committee or the Remuneration and Nomination Committee as stated in the Minutes of Meeting of the Remuneration and Nomination Committee No. 07/NR-KRN/IV/2021 ; No. 23/SDK-IV/2021 dated April 5, 2021.
8.	Direksi memiliki pedoman dan tata tertib kerja yang telah mencantumkan pengaturan etika kerja, waktu kerja, dan rapat. The Board of Directors has guidelines and work rules that include work ethic arrangements, working hours, and meetings.	Ya, Direksi telah memiliki pedoman dan tata tertib kerja yang telah mencantumkan pengaturan etika kerja, waktu kerja dan rapat. Pedoman tersebut sesuai dengan Surat Keputusan Direksi BRI AGRO (telah berganti nama menjadi BANK RAYA) No.Kpts. B. 286/DIR.02.04/OJL/06/2021 tanggal 16 Juni 2021 tentang Pedoman dan Tata Kerja Direksi. Yes, the Board of Directors already has guidelines and work rules that include work ethic arrangements, working hours and meetings. These guidelines are in accordance with the Decree of the Board of Directors of BRI AGRO (has changed its name to BANK RAYA) No. Kpts. B. 286/DIR.02.04/OJL/06/2021 dated June 16, 2021 concerning Guidelines and Work Procedures for the Board of Directors.
9.	Direksi tidak menggunakan penasihat perorangan dan/atau jasa profesional sebagai konsultan kecuali untuk proyek yang bersifat khusus, telah didasari oleh kontrak yang jelas meliputi lingkup kerja, tanggung jawab, jangka waktu pekerjaan, dan biaya, serta konsultan merupakan pihak independen yang memiliki kualifikasi untuk mengerjakan proyek yang bersifat khusus. The Board of Directors does not use individual advisors and/or professional services as consultants except for projects that are specific in nature, have been based on a clear contract covering the scope of work, responsibilities, work period, and costs, and the consultant is an independent party who has the qualifications to work on the project. of a special nature.	Ya, Direksi tidak menggunakan penasihat perorangan dan atau jasa profesional dengan konsultan kecuali untuk proyek yang bersifat khusus, dan telah didasari oleh kontrak yang jelas meliputi lingkup kerja, tanggung jawab, jangka waktu pekerjaan, dan biaya serta konsultan merupakan pihak independen yang memiliki kualifikasi untuk mengerjakan proyek yang bersifat khusus tersebut. Yes, the Board of Directors does not use individual advisors and or professional services with consultants except for projects that are specific in nature, and have been based on a clear contract covering the scope of work, responsibilities, period of work, and costs and the consultant is an independent party who has the qualifications to do the work. the special project.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
10.	Seluruh Anggota Direksi memiliki integritas, kompetensi, dan reputasi keuangan yang memadai. All members of the Board of Directors have adequate integrity, competence and financial reputation.	Ya, Anggota Direksi memiliki integritas, kompetensi dan reputasi keuangan yang memadai. Hal ini berdasarkan hasil <i>Fit & Proper Test</i> OJK yang dinyatakan lulus test tersebut dan Surat Pernyataan mengenai pengelolaan perusahaan berdasarkan prinsip kehati-hatian dan prinsip <i>Good Corporate Governance</i> serta hasil evaluasi kinerja secara reguler oleh OJK yang telah ditandatangani pada saat mengikuti <i>fit & proper test</i> . Yes, members of the Board of Directors have sufficient integrity, competence and financial reputation. This is based on the results of the OJK Fit & Proper Test which was declared to have passed the test and a Statement Letter regarding the management of the company based on prudential principles and the principles of Good Corporate Governance as well as the results of regular performance evaluations by the OJK which were signed during the fit & proper test.
11.	Presiden Direktur atau Direktur Utama, berasal dari Pihak yang Independen terhadap Pemegang Saham Pengendali, yaitu tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan dan hubungan keluarga. The President Director or President Director, comes from a Party that is Independent of the Controlling Shareholder, i.e. has no financial relationship, management relationship, ownership relationship and family relationship.	Ya, Direktur Utama berasal dari pihak yang independen terhadap Pemegang Saham Pengendali, yaitu tidak memiliki hubungan keuangan, kepengurusan dan hubungan keluarga dengan Pemegang Saham Pengendali, hal ini telah disampaikan dalam Surat Pernyataan yang bersangkutan pada saat mengikuti <i>fit n proper test</i> . Yes, the President Director comes from a party that is independent of the Controlling Shareholder, i.e. has no financial, management and family relationship with the Controlling Shareholder, this has been stated in the relevant Statement Letter when participating in the fit n proper test.
12.	Seluruh Anggota Direksi telah lulus penilaian kemampuan dan kepatutan, dan telah memperoleh surat persetujuan dari Otoritas Jasa Keuangan. All members of the Board of Directors have passed the fit and proper test, and have obtained a letter of approval from the Financial Services Authority.	Ya, 5 (lima) anggota Direksi telah lulus <i>fit & proper test</i> dan telah memperoleh surat persetujuan dari OJK. Yes, 5 (five) members of the Board of Directors have passed the fit & proper test and have obtained a letter of approval from the OJK.
13.	Anggota Direksi memiliki kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawab serta mampu mengimplementasikan kompetensi yang dimiliki dalam pelaksanaan tugas dan tanggung jawab. Members of the Board of Directors have adequate and relevant competencies to carry out their duties and responsibilities and are able to implement their competencies in carrying out their duties and responsibilities.	Ya, Anggota Direksi memiliki kompetensi yang memadai, dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawabnya serta mampu mengimplementasikan kompetensi yang dimilikinya dalam pelaksanaan tugas dan tanggung jawabnya. Hal ini berdasarkan kompetensi yang tertuang dalam Daftar Riwayat hidup masing-masing anggota Direksi . Yes, members of the Board of Directors have adequate competence and are relevant to their position to carry out their duties and responsibilities and are able to implement their competencies in carrying out their duties and responsibilities. This is based on the competencies contained in the curriculum vitae of each member of the Board of Directors.
14.	Anggota Direksi memiliki kemauan dan kemampuan untuk melakukan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang Perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawab.	Ya, Anggota Direksi memiliki kemauan dan kemampuan untuk melakukan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan/ lainnya yang mendukung pelaksanaan tugas dan tanggung jawabnya, Selama Semester II Tahun 2021, Direksi mengikuti beberapa <i>Training/Workshop</i> yaitu: a) <i>Refreshment</i> Sertifikasi Manajemen Risiko Level 5 yang diselenggarakan oleh Efektif <i>pro</i> melalui <i>online</i> pada tanggal 14 Juli 2021. b) Webinar Pencegahan Korupsi dengan Metode <i>Judgement</i> yang diselenggarakan oleh Visi Integritas melalui <i>online</i> pada tanggal 27 Agustus 2021. c) Pembekalan Sertifikasi Kepatuhan yang diselenggarakan oleh FKDKP melalui <i>online training</i> tanggal 21 -24 September 2021.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
	Members of the Board of Directors have the willingness and ability to carry out continuous learning in order to increase knowledge about Banking and the latest developments related to the financial sector or other fields that support the implementation of their duties and responsibilities.	d) Pendidikan <i>Refreshment</i> melalui <i>online training</i> yang diselenggarakan oleh LPPI tanggal 21 - 22 Oktober 2021 & 9 -10 November 2021. e) <i>Benchmark Program</i> SESPIBANK Angkatan 72 yang diselenggarakan oleh LPPI Switzerland tanggal 19 November 2021 - 03 Desember 2021. f) FGD 'Penyelenggara Pra Rakernas Penyesuaian RBB 2022-2024 dan <i>Sharing Session 'Business Model Innovation in Consumer Goods</i> (FMCG) yang diselenggarakan oleh ESQ tanggal 19 - 20 November 2021 di Hotel Harris Kelapa Gading Jakarta. Yes, Members of the Board of Directors have the will and ability to carry out continuous learning in order to increase knowledge about banking and the latest developments related to finance/other fields that support the implementation of their duties and responsibilities. During Semester II of 2021, the Board of Directors attended several Trainings/Workshops, namely: a) Refreshment of Level 5 Risk Management Certification organized by Effective pro via online on July 14, 2021. b) Webinar on Prevention of Corruption with the Judgment Method held by Visi Integrity online on August 27, 2021. c) Provision of Compliance Certification organized by FKDKP through online training on September 21-24, 2021. d) Refreshment education through online training organized by LPPI on October 21 - 22, 2021 & November 9 -10, 2021. e) SESPIBANK Program Benchmark Batch 72 organized by LPPI Switzerland on November 19, 2021 - December 03, 2021. f) FGD 'Organizing the Pre-Rakernas RBB Adjustment 2022-2024 and <i>Sharing Session 'Business Model Innovation in Consumer Goods</i> (FMCG) held by ESQ on November 19 - 20, 2021 at Harris Hotel Kelapa Gading Jakarta.
15.	Anggota Direksi membudayakan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawab pada seluruh tingkatan atau jenjang organisasi. Members of the Board of Directors cultivate a culture of continuous learning in order to increase knowledge about banking and the latest developments related to finance or other fields that support the implementation of duties and responsibilities at all levels or levels of the organization.	Ya, Anggota Direksi membudayakan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan/lainnya yang mendukung pelaksanaan tugas dan tanggung jawabnya pada seluruh tingkatan atau jenjang organisasi. Hal ini telah dilaksanakan peningkatan pengetahuan untuk seluruh jenjang organisasi seperti keikutsertaan dalam Sertifikasi Manajemen Risiko sesuai level yang dipersyaratkan hingga level Program Eksekutif Direksi. Yes, Members of the Board of Directors cultivate a culture of continuous learning in order to increase knowledge about banking and the latest developments related to finance/other fields that support the implementation of their duties and responsibilities at all levels or levels of the organization. This has been carried out to increase knowledge for all levels of the organization such as participation in Risk Management Certification according to the required level up to the Executive Board of Directors Program level.
16.	Komposisi Direksi tidak memenuhi ketentuan karena adanya intervensi Pemilik. The composition of the Board of Directors does not meet the requirements due to the owner's intervention.	Komposisi Direksi tidak memenuhi ketentuan karena adanya intervensi Pemilik. The composition of the Board of Directors does not meet the requirements due to the owner's intervention.
B. Governance Process		Governance Process
1.	Direksi telah mengangkat Anggota Komite, didasarkan pada keputusan rapat Dewan Komisaris The Board of Directors has appointed Committee Members, based on the decision of the Board of Commissioners meeting	Ya, Direksi telah mengangkat Anggota Komite berdasarkan keputusan rapat Dewan Komisaris dan disahkan dalam Surat Keputusan Direksi Yes, the Board of Directors has appointed Committee Members based on the decision of the Board of Commissioners meeting and ratified in the Board of Directors Decree

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
2.	Anggota Direksi tidak memberikan kuasa umum kepada pihak lain yang mengakibatkan pengalihan tugas dan fungsi Direksi. Members of the Board of Directors do not give general power of attorney to other parties resulting in the transfer of duties and functions of the Board of Directors.	Ya, Anggota Direksi tidak memberikan kuasa umum kepada pihak lain yang mengakibatkan pengalihan tugas dan fungsi Direksi karena hal ini telah ditegaskan di dalam pasal 12 ayat (21) Anggaran Dasar Bank. Yes, members of the Board of Directors do not give general power of attorney to other parties resulting in the transfer of duties and functions of the Board of Directors because this has been confirmed in article 12 paragraph (21) of the Bank's Articles of Association.
3.	Direksi bertanggung jawab penuh atas pelaksanaan kepengurusan Bank. The Board of Directors is fully responsible for the implementation of the Bank's management.	Ya, Direksi bertanggung jawab penuh atas pelaksanaan kepengurusan Bank. Yes, the Board of Directors is fully responsible for the implementation of the Bank's management.
4.	Direksi mengelola Bank sesuai kewenangan dan tanggung jawab sebagaimana diatur dalam anggaran dasar dan peraturan perundang-undangan. The Board of Directors manages the Bank in accordance with the authorities and responsibilities as stipulated in the articles of association and laws and regulations.	Ya, Direksi mengelola Bank sesuai dengan kewenangan dan tanggung jawabnya yang tertuang dalam sesuai dengan Anggaran Dasar dan peraturan perundang-undangan yang berlaku. Yes, the Board of Directors manages the Bank in accordance with the authorities and responsibilities as stated in the Articles of Association and the prevailing laws and regulations.
5.	Direksi telah melaksanakan tugas dan tanggung jawab secara Independen terhadap Pemegang Saham. The Board of Directors has carried out its duties and responsibilities independently to the Shareholders.	Ya, Direksi telah melaksanakan tugas dan tanggung jawabnya secara Independen terhadap Pemegang Saham. Yes, the Board of Directors has carried out its duties and responsibilities independently to the Shareholders.
6.	Direksi telah menerapkan prinsip-prinsip Tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi. The Board of Directors has implemented the principles of Good Governance in every business activity of the Bank at all levels or levels of the organization.	Direksi telah menerapkan prinsip-prinsip Tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi. The Board of Directors has implemented the principles of Good Governance in every business activity of the Bank at all levels or levels of the organization.
7.	Direksi telah menindaklanjuti Temuan Audit dan Rekomendasi dari Satuan Kerja Audit Intern (SKAI), Auditor Eksternal, dan hasil Pengawasan Otoritas Jasa Keuangan dan/atau hasil Pengawasan Otoritas Lain.	Ya, Direksi telah menindaklanjuti Temuan Audit dan Rekomendasi dari Satuan Kerja Audit Intern (SKAI), Auditor Eksternal dan hasil Pengawasan Otoritas Jasa Keuangan dan/atau hasil Pengawasan Otoritas lain, antara lain tercantum dalam : a. Surat Bank kepada OJK No.R.194/SKAI/SKL/06/2021 tanggal 30 Juni 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) b. Surat Bank kepada OJK No.R.216/SKAI/SKL/07/2021 tanggal 29 Juli 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) posisi 30 April 2018 & posisi 31 Januari 2020. c. Surat Bank kepada OJK No.R.217/SKAI/SKL/08/2021 tanggal 31 Agustus 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (telah berganti nama menjadi PT Bank Raya Indonesia, Tbk.) posisi 30 April 2018 & posisi 31 Januari 2020.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
	The Board of Directors has followed up on the Audit Findings and Recommendations from the Internal Audit Unit (SKAI), External Auditors, and the results of the Supervision of the Financial Services Authority and/or the results of the Supervision of Other Authorities.	d. Surat Bank kepada OJK No.R.280/SKAI/SKL//10/2021 tanggal 29 Oktober 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk.(telah berganti nama menjadi PT Bank Raya Indonesia, Tbk). posisi 30 April 2018 & posisi 31 Januari 2020. e. Surat Bank kepada OJK No.R.315/SKAI/SKL/12/2021 tanggal 30 Desember 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk.(telah berganti nama menjadi PT Bank Raya Indonesia, Tbk). Posisi 30 April 2018 & Posisi 31 Januari 2020. f. Surat Bank kepada OJK No.R.217/SKAI/SKL/12/2021 tanggal 31 Desember 2021 perihal Tindak lanjut Hasil Pemeriksaan pada Aktivitas Perkreditan, Operasional, Strategik, GCG serta Penerapan APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk.(telah berganti nama menjadi PT Bank Raya Indonesia, Tbk). posisi 30 April & posisi 31 Januari 2020. Yes, the Board of Directors has followed up on the Audit Findings and Recommendations from the Internal Audit Unit (SKAI), External Auditors and the results of the Financial Services Authority Supervision and/or the results of the Supervision of other Authorities, including those listed in: a. Bank Letter to OJK No.R.194/SKAI/SKL/06/2021 dated June 30, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (has changed its name to PT Bank Raya Indonesia, Tbk.) b. Bank Letter to OJK No.R.216/SKAI/SKL/07/2021 dated July 29, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (has changed its name to PT Bank Raya Indonesia, Tbk.) position April 30, 2018 & January 31, 2020. c. Bank Letter to OJK No.R.217/SKAI/SKL/08/2021 dated August 31, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (has changed its name to PT Bank Raya Indonesia, Tbk.) position April 30, 2018 & January 31, 2020 position. d. Bank Letter to OJK No.R.280/SKAI/SKL//10/2021 dated October 29, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (has changed its name to PT Bank Raya Indonesia, Tbk.) position April 30, 2018 & January 31, 2020 position. e. Bank Letter to OJK No.R.315/SKAI/SKL/12/2021 dated December 30, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (has changed its name to PT Bank Raya Indonesia, Tbk). Position April 30, 2018 & Position January 31, 2020. f. Bank Letter to OJK No.R.217/SKAI/SKL/12/2021 dated December 31, 2021 regarding Follow-up on Audit Results on Credit, Operational, Strategic, GCG Activities and Application of APU PPT PT Bank Rakyat Agroniaga Indonesia, Tbk. (has changed its name to PT Bank Raya Indonesia, Tbk.) position April 30 & position January 31, 2020.
8.	Direksi telah menyediakan data dan informasi yang lengkap, akurat, terkini, dan tepat waktu kepada Dewan Komisaris. Board of Directors has provided complete, accurate, current and timely data and information to the Board of Commissioners.	Ya, Direksi telah menyediakan data dan informasi yang lengkap, akurat, terkini dan tepat waktu kepada Dewan Komisaris. Penyediaan data dan informasi tersebut telah disampaikan Direksi kepada Dewan Komisaris dalam Laporan Kinerja Bank setiap bulannya. Yes, the Board of Directors has provided complete, accurate, current and timely data and information to the Board of Commissioners. The provision of data and information has been submitted by the Board of Directors to the Board of Commissioners in the Bank's Performance Report every month.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
9.	Pengambilan keputusan rapat Direksi telah dilakukan berdasarkan musyawarah untuk mufakat atau suara terbanyak dalam hal tidak terjadi musyawarah untuk mufakat. Decisions on the Board of Directors meeting have been made based on deliberation for consensus or by majority vote in the event that deliberation for consensus does not occur.	Pengambilan keputusan rapat Direksi telah dilakukan berdasarkan musyawarah untuk mufakat atau suara terbanyak dalam hal tidak terjadi musyawarah untuk mufakat sebagaimana disampaikan di dalam Notulen Rapat Direksi Decisions on the Board of Directors meeting have been made based on deliberation for consensus or a majority vote in the event that there is no deliberation for consensus as stated in the Minutes of the Board of Directors Meeting.
10.	Setiap keputusan rapat yang diambil Direksi dapat diimplementasikan dan sesuai dengan kebijakan, pedoman serta tata tertib kerja yang berlaku. Every meeting decision taken by the Board of Directors can be implemented and in accordance with applicable policies, guidelines and work procedures.	Ya, setiap keputusan rapat yang diambil Direksi dapat diimplementasikan dan telah sesuai dengan kebijakan, pedoman serta tata tertib kerja yang berlaku sebagaimana diatur di dalam Anggaran Dasar Bank dan Surat Keputusan Direksi BRI AGRO (telah berganti nama menjadi BANK RAYA) No. Kpts. B. 286/DIR.02.04/OJL/06/2021 tanggal 16 Juni 2021 tentang Pedoman dan Tata Kerja Direksi. Yes, every meeting decision taken by the Board of Directors can be implemented and is in accordance with the applicable policies, guidelines and work procedures as stipulated in the Bank's Articles of Association and the Decree of the Board of Directors of BRI AGRO (has changed its name to BANK RAYA) No. Kpts. B. 286/DIR.02.04/OJL/06/2021 dated June 16, 2021 concerning Guidelines and Work Procedures for the Board of Directors.
11.	Direksi telah menetapkan kebijakan dan keputusan strategis melalui mekanisme rapat Direksi. The Board of Directors has established policies and strategic decisions through the mechanism of the Board of Directors meeting.	Ya, Direksi telah menetapkan kebijakan dan keputusan strategis melalui mekanisme rapat Direksi. Hasil rapat Direksi telah dituangkan dalam Risalah Rapat dan didokumentasikan dengan baik. Yes, the Board of Directors has established policies and strategic decisions through the mechanism of the Board of Directors meeting. The results of the Board of Directors meeting have been stated in the Minutes of Meeting and are well documented.
12.	Direksi tidak memanfaatkan Bank untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang dapat merugikan atau mengurangi keuntungan Bank. The Board of Directors does not take advantage of the Bank for personal, family, and/or other party interests that may harm or reduce the Bank's profits.	Ya, Direksi tidak memanfaatkan Bank untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang merugikan atau mengurangi keuntungan Bank. Hal ini dibuktikan dengan tidak adanya hasil pemeriksaan dari internal audit maupun eksternal audit terkait dengan hal tersebut di atas sampai dengan posisi 31 Desember 2021. Yes, the Board of Directors does not take advantage of the Bank for personal, family, and/or other party interests that harm or reduce the Bank's profits. This is evidenced by the absence of inspection results from internal audits and external audits related to the above as of December 31, 2021.
13.	Direksi tidak mengambil dan/atau menerima keuntungan pribadi dari Bank selain remunerasi dan fasilitas lainnya yang ditetapkan Rapat Umum Pemegang Saham (RUPS). The Board of Directors does not take and/or receive personal benefits from the Bank other than remuneration and other facilities determined by the General Meeting of Shareholders (GMS).	Ya, Direksi tidak mengambil dan/atau menerima keuntungan pribadi dari Bank selain remunerasi dan fasilitas lainnya yang ditetapkan dalam RUPS. Hal ini dibuktikan dengan tidak adanya hasil pemeriksaan dari internal audit maupun eksternal audit terkait dengan hal tersebut di atas sampai dengan posisi 31 Desember 2021. Yes, the Board of Directors does not take and/or receive personal benefits from the Bank other than the remuneration and other facilities stipulated in the GMS. This is evidenced by the absence of inspection results from internal audits and external audits related to the above as of December 31, 2021.
14.	Pemilik melakukan intervensi terhadap pelaksanaan tugas Direksi yang menyebabkan kegiatan operasional Bank terganggu sehingga berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank.	Pemilik tidak melakukan intervensi terhadap pelaksanaan tugas Direksi yang menyebabkan kegiatan operasional Bank terganggu sehingga akan berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank. Hal ini dibuktikan dengan tidak adanya hasil pemeriksaan dari internal audit maupun eksternal audit terkait dengan hal tersebut di atas sampai dengan posisi 31 Desember 2021.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
	The owner intervenes in the implementation of the duties of the Board of Directors which causes the Bank's operational activities to be disrupted so that it has an impact on reducing the Bank's profits and/or causing the Bank's losses.	The owner does not intervene in the implementation of the duties of the Board of Directors which causes the Bank's operational activities to be disrupted so that it will have an impact on reducing the Bank's profits and/or causing the Bank's losses. This is evidenced by the absence of inspection results from internal audits and external audits related to the above as of December 31, 2021.
C.	Governance Outcome	Governance Outcome
1.	Direksi telah mempertanggungjawabkan pelaksanaan tugasnya kepada Pemegang Saham melalui RUPS The Board of Directors has been accountable for the implementation of its duties to the Shareholders through the GMS	Ya, pertanggungjawaban Direksi atas pelaksanaan tugasnya diterima oleh Pemegang Saham melalui RUPS Tahunan tanggal 09 April 2021 dan tertuang dalam Akta Pernyataan Keputusan Rapat No.14 tanggal 19 April 2021 yang dibuat dihadapan M. Nova Faisal, SH. M.Kn., Notaris di Jakarta. Yes, the Board of Directors' accountability for carrying out their duties is accepted by the Shareholders through the Annual GMS on April 9, 2021 and stated in the Deed of Statement of Meeting Resolutions No. 14 dated April 19, 2021, drawn up before M. Nova Faisal, SH. M.Kn., Notary in Jakarta.
2.	Pertanggungjawaban Direksi atas pelaksanaan tugasnya diterima oleh Pemegang Saham melalui RUPS The Board of Directors' accountability for the implementation of their duties is accepted by the Shareholders through the GMS	Ya, pertanggungjawaban Direksi atas pelaksanaan tugasnya diterima oleh Pemegang Saham melalui RUPS Tahunan tanggal 09 April 2021 dan tertuang dalam Akta Pernyataan Keputusan Rapat No.14 tanggal 19 April 2021 yang dibuat dihadapan M. Nova Faisal, SH. M.Kn., Notaris di Jakarta. Yes, the Board of Directors' accountability for carrying out their duties is accepted by the Shareholders through the Annual GMS on April 9, 2021 and stated in the Deed of Statement of Meeting Resolutions No. 14 dated April 19, 2021, drawn up before M. Nova Faisal, SH. M.Kn., Notary in Jakarta.
3.	Direksi telah mengungkapkan kebijakan Bank yang bersifat strategis di bidang kepegawaian kepada pegawai dengan media yang mudah diakses pegawai The Board of Directors has disclosed the Bank's strategic policies in the field of personnel to employees using media that is easily accessible to employees	Direksi telah mengungkapkan kebijakan Bank yang bersifat strategis di bidang kepegawaian kepada pegawai dengan media yang mudah diakses pegawai, yaitu baik dalam bentuk nota dinas internal maupun dokumentasi digital terkait kebijakan dimaksud. The Board of Directors has disclosed the Bank's strategic policies in the field of personnel to employees with media that is easily accessible to employees, namely in the form of internal service notes and digital documentation related to the policy.
4.	Direksi telah mengkomunikasikan kepada pegawai mengenai arah bisnis Bank dalam rangka pencapaian misi dan visi Bank. The Board of Directors has communicated to employees regarding the Bank's business direction in order to achieve the Bank's mission and vision.	Ya, Direksi telah mengkomunikasikan kepada pegawai mengenai arah bisnis Bank dalam rangka pencapaian misi dan visi Bank. Hal ini disampaikan baik dalam rapat Direksi yang dihadiri oleh seluruh pemimpin Unit Kerja maupun melalui pemaparan dalam briefing pagi oleh Direksi kepada seluruh pekerja dengan media <i>video conference</i> . Yes, the Board of Directors has communicated to employees regarding the Bank's business direction in order to achieve the Bank's mission and vision. This was conveyed both in the Board of Directors meeting which was attended by all Heads of Work Units and through presentations in the morning briefing by the Board of Directors to all workers via video conference media.
5.	Hasil rapat Direksi telah dituangkan dalam Risalah Rapat dan didokumentasikan dengan baik, termasuk pengungkapan secara jelas perbedaan pendapat (<i>dissenting opinions</i>) yang terjadi dalam rapat Direksi. The results of the Board of Directors meeting have been stated in the Minutes of Meeting and are well documented, including the clear disclosure of dissenting opinions that occurred in the Board of Directors meeting.	Ya, hasil rapat Direksi telah dituangkan dalam Risalah Rapat Direksi dan didokumentasikan dengan baik oleh Divisi Sekretariat Perusahaan. Yes, the results of the Board of Directors meeting have been stated in the Minutes of the Board of Directors Meeting and are well documented by the Corporate Secretariat Division.

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis																				
6.	Dalam laporan pelaksanaan Tata Kelola, seluruh Anggota Direksi paling sedikit telah mengungkapkan: a) Kepemilikan Saham yang mencapai 5% (lima persen) atau lebih pada Bank dan Perusahaan lain yang berkedudukan di dalam dan di luar negeri; b) Hubungan keuangan dan hubungan keluarga dengan Anggota Direksi lain, Anggota Dewan Komisaris dan/atau Pemegang Saham Pengendali Bank; c) Remunerasi dan fasilitas lain; d) Opsi saham (<i>share option</i>) yang dimiliki Direksi.	a) Kepemilikan Saham yang mencapai 5% (lima persen) atau lebih pada Bank yang bersangkutan maupun pada Bank dan Perusahaan lain yang berkedudukan di dalam dan di luar negeri. Hal ini sesuai dengan surat pernyataan masing-masing anggota Direksi pada saat mengikuti <i>Fit & Proper Test</i> OJK dan data yang tercatat pada Biro Administrasi Efek yang menyatakan bahwa kepemilikan saham masing-masing anggota Direksi pada Bank kurang dari 5% (lima persen). b) Hubungan keuangan dan hubungan keluarga dengan Anggota Dewan Komisaris, Anggota Direksi lainnya dan/atau Pemegang Saham Pengendali Bank. Hal ini sesuai dengan surat pernyataan yang dibuat oleh masing-masing anggota Direksi bahwa tidak terkait hubungan keluarga sampai derajat kedua dengan anggota Dewan Komisaris dan Anggota Direksi lainnya. c) Ya, Remunerasi dan fasilitas lain sudah diungkapkan di dalam Surat BRI Agro No.B.170/DK/XI/2021 tanggal 17 November 2021 Perihal Remunerasi dan Benefit Pengurus Bank Raya Tahun 2021 d) Terdapat alokasi <i>shares option</i> untuk Pengurus Bank sesuai dengan Surat Keputusan Direksi No.SE : B.25A/Dir.01.02/SKP/12/2018 tentang ketentuan MESOP untuk Direksi dan Komisaris dengan ketentuan sebagai berikut : <table><thead><tr><th>Periode</th><th>Target Periode</th><th>% dari Jumlah total saham yang dibagi</th><th>Jumlah saham (Lembar)</th></tr></thead><tbody><tr><td>Tahap I</td><td>10 Desember 2018</td><td>50%</td><td>52.500.000</td></tr><tr><td>Tahap II</td><td>1 April 2019</td><td>30%</td><td>31.500.000</td></tr><tr><td>Tahap III</td><td>1 April 2020</td><td>20%</td><td>21.000.000</td></tr><tr><td>Total</td><td></td><td>100%</td><td>105.000.000</td></tr></tbody></table>	Periode	Target Periode	% dari Jumlah total saham yang dibagi	Jumlah saham (Lembar)	Tahap I	10 Desember 2018	50%	52.500.000	Tahap II	1 April 2019	30%	31.500.000	Tahap III	1 April 2020	20%	21.000.000	Total		100%	105.000.000
Periode	Target Periode	% dari Jumlah total saham yang dibagi	Jumlah saham (Lembar)																			
Tahap I	10 Desember 2018	50%	52.500.000																			
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Tahap III	1 April 2020	20%	21.000.000																			
Total		100%	105.000.000																			
	In the report on the implementation of Governance, all members of the Board of Directors have at least disclosed: a) Share ownership that reaches 5% (five percent) or more in Banks and other Companies domiciled at home and abroad; b) Financial relationship and family relationship with other Members of the Board of Directors, Members of the Board of Commissioners and/or Controlling Shareholders of the Bank; c) Remuneration and other facilities; d) Share options (<i>share options</i>) owned by the Board of Directors.	a) Share ownership that reaches 5% (five percent) or more in the Bank concerned as well as in other Banks and Companies domiciled at home and abroad. This is in accordance with the statement letter of each member of the Board of Directors when participating in the OJK <i>Fit & Proper Test</i> and the data recorded at the Securities Administration Bureau which states that the share ownership of each member of the Board of Directors in the Bank is less than 5% (five percent). b) Financial relationship and family relationship with Members of the Board of Commissioners, other Members of the Board of Directors and/or Controlling Shareholders of the Bank. This is in accordance with the statement made by each member of the Board of Directors that it is not related to family relations to the second degree with members of the Board of Commissioners and other members of the Board of Directors. c) Yes, remuneration and other facilities have been disclosed in BRI Agro Letter No. B.170/DK/XI/2021 dated November 17, 2021 regarding remuneration and benefits for Bank Raya management in 2021 d) There is an allocation of shares option for Bank Management in accordance with the Decree of the Board of Directors No. SE : B.25A/Dir.01.02/SKP/12/2018 regarding MESOP provisions for Directors and Commissioners with the following provisions:																				

No.	Kriteria/Indikator Criteria/Indicators	Analysis Analysis			
		Period	Target Period	% of the total number of shares divided	Number of shares (sheet)
		Stage I	10 December 2018	50%	52.500.000
		Stage II	April 1, 2019	30%	31.500.000
		Stage III	April 1, 2020	20%	21.000000
		Total		100%	105.000.000
7.	Peningkatan pengetahuan, keahlian, dan kemampuan Anggota Direksi dalam pengelolaan Bank yang ditunjukkan antara lain dengan peningkatan kinerja Bank, penyelesaian permasalahan yang dihadapi Bank, dan pencapaian hasil sesuai ekspektasi Pemangku Kepentingan Bank. Increased knowledge, expertise, and ability of members of the Board of Directors in managing the Bank, which is shown, among others, by improving the performance of the Bank, solving problems faced by the Bank, and achieving results in accordance with the expectations of the Bank's Stakeholders.	Ya, peningkatan pengetahuan, keahlian, dan kemampuan Anggota Direksi dalam pengelolaan Bank telah dilakukan. Hal ini tercermin antara lain dari peningkatan kinerja Bank, penyelesaian permasalahan yang dihadapi Bank dan pencapaian hasil sesuai ekspektasi <i>stakeholders</i> sebagaimana disampaikan di dalam Laporan Keuangan Bank (<i>Audited</i>) posisi 31 Desember 2021. Yes, there has been an increase in the knowledge, skills and abilities of the members of the Board of Directors in managing the Bank. This is reflected in, among others, the improvement of the Bank's performance, the resolution of problems faced by the Bank and the achievement of results in accordance with the expectations of stakeholders as stated in the Bank's Financial Statements (<i>Audited</i>) position December 31, 2021.			
8.	Peningkatan pengetahuan, keahlian, dan kemampuan dari seluruh karyawan Bank pada seluruh tingkatan atau jenjang organisasi yang ditunjukkan antara lain dengan peningkatan kinerja individu sesuai tugas dan tanggung jawab. Increased knowledge, skills, and abilities of all employees of the Bank at all levels or levels of the organization which is shown, among others, by increasing individual performance according to their duties and responsibilities.	Ya, telah dilakukan peningkatan pengetahuan, keahlian, dan kemampuan kepada beberapa karyawan Bank pada semua tingkatan atau jenjang organisasi untuk unit kerja/fungsi tertentu. Peningkatan pengetahuan tersebut antara lain telah dilaksanakan untuk seluruh jenjang organisasi untuk Sertifikasi Manajemen Risiko dari level 1 hingga level 4 sesuai dengan ketentuan yang berlaku terkait dengan sertifikasi Manajemen Risiko dan sertifikasi lainnya yang bersifat wajib dan penunjang. Adapun pelaksanaan sertifikasi tersebut di atas terus dilakukan untuk karyawan baru maupun karyawan yang baru dialih tugaskan di unit-unit kerja tertentu dengan tugas dan jabatan yang baru secara berkelanjutan dari waktu ke waktu. Yes, the Bank's employees at all levels or levels of the organization for certain work units/functions have increased their knowledge, skills and abilities. The increase in knowledge has, among others, been implemented for all levels of the organization for Risk Management Certification from level 1 to level 4 in accordance with applicable regulations related to Risk Management certification and other mandatory and supporting certifications. As for the implementation of the certification above, it continues to be carried out for new employees and employees who have just been transferred to certain work units with new tasks and positions on an ongoing basis from time to time.			

No.	Kriteria/Indikator Criteria/Indicators	Analisis Analysis
9.	Peningkatan budaya pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawab pada seluruh tingkatan atau jenjang organisasi yang ditunjukkan antara lain dengan peningkatan keikutsertaan karyawan Bank dalam Sertifikasi Perbankan dan/atau pendidikan atau pelatihan dalam rangka pengembangan kualitas individu. Continuous improvement of learning culture in order to increase knowledge about banking and the latest developments related to finance or other fields that support the implementation of duties and responsibilities at all levels or levels of the organization which is shown, among others, by increasing the participation of Bank employees in Banking Certification and/or education or training in the context of individual quality development.	Ya, telah dilakukan peningkatan budaya pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan/lainnya yang mendukung pelaksanaan tugas dan tanggung jawabnya pada seluruh tingkatan atau jenjang organisasi yang ditunjukkan antara lain dengan peningkatan keikutsertaan karyawan Bank dalam Sertifikasi Perbankan dan/atau pendidikan/pelatihan dalam rangka pengembangan kualitas individu. Hal ini terbukti dari laporan realisasi <i>training</i> yang dilakukan kepada pekerja Bank sampai dengan posisi 31 Desember 2021. Yes, there has been a continuous improvement in the learning culture in order to increase knowledge about banking and the latest developments related to finance/other fields that support the implementation of their duties and responsibilities at all levels or levels of the organization which are shown, among others, by increasing the participation of Bank employees in Banking Certification and/or education/training in the context of individual quality development. This is evident from the report on the realization of training conducted for Bank employees up to the position of December 31, 2021.
10.	Kegiatan operasional Bank terganggu dan/atau memberikan keuntungan yang tidak wajar kepada Pemilik yang berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank, akibat intervensi Pemilik terhadap komposisi dan/atau pelaksanaan tugas Direksi. The Bank's operational activities are disrupted and/or provide unreasonable profits to the Owners which have an impact on reducing the Bank's profits and/or causing losses to the Bank, due to the Owner's intervention on the composition and/or execution of the duties of the Board of Directors.	Pemilik tidak melakukan intervensi terhadap komposisi dan/atau pelaksanaan tugas Direksi yang mengakibatkan kegiatan operasional Bank terganggu dan/atau memberikan keuntungan yang tidak wajar kepada Pemilik yang berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank. Hal ini dibuktikan dengan tidak adanya hasil pemeriksaan dari internal audit maupun eksternal audit terkait dengan hal tersebut di atas sampai dengan posisi 31 Desember 2021. The Owner does not intervene in the composition and/or implementation of the duties of the Board of Directors which results in the Bank's operational activities being disrupted and/or providing an unreasonable profit to the Owner which results in a reduction in the Bank's profits and/or causes a loss to the Bank. This is evidenced by the absence of inspection results from internal audits and external audits related to the above as of December 31, 2021.



Transparansi Informasi dan Independensi Dewan Komisaris dan Direksi

Transparency of Information and The Boards of Commissioners and Directors' Independence

Dalam menjalankan fungsi, tugas dan tanggung jawabnya, anggota Dewan Komisaris dan Direksi Bank wajib menjaga independensi dan menghindari segala bentuk benturan kepentingan, baik untuk kepentingan pribadi, kelompok dan golongan tertentu.

Members of the Board of Commissioners and the Board of Directors of the Bank are obligated to preserve independence and prevent any sort of conflict of interest, whether personal, group, or particular, in carrying out their tasks, duties, and obligations.

Kepemilikan Saham Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors Shared Ownership

Anggota Dewan Komisaris dan Direksi Bank Raya (dan anggota keluarga) memiliki kewajiban untuk melaporkan kepemilikan saham, baik di Bank maupun di perusahaan terbuka lainnya.

Members of the Bank Raya's Board of Commissioners and Directors (as well as family members) are required to disclose their ownership interests in the Bank and other public firms.

Nama Name	Jabatan Position	Kepemilikan Saham AGRO AGRO Share Ownership		Kepemilikan Saham Perusahaan Lain Share Ownership of Other Companies		
		Jumlah Saham Number of shares	Persentase Percentage	Nama Perusahaan Company name	Jumlah Saham Number of shares	Persentase Percentage
Budi Satria	Komisaris Utama President Commissioner	1.351.453	0,0059%	n/a	n/a	n/a
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	-	-	n/a	n/a	n/a
Rina Saadah	Komisaris Independen Independent Commissioner	-	-	n/a	n/a	n/a
Rama Notowidigdo	Komisaris Independen Independent Commissioner	-	-	n/a	n/a	n/a
Achmad F.C Barir	Komisaris Commissioner	1.216.287	0,0053%	n/a	n/a	n/a
Kaspar Situmorang	Direktur Utama President director	3.003.336	0,013%	n/a	n/a	n/a
Arif Wicaksono	Direktur Keuangan dan Operasional Director of Finance and Operations	2.552.642	0,011%	n/a	n/a	n/a
Ernawan	Direktur Enterprise Risk Management, Compliance & Human Resource Director of Enterprise Risk Management, Compliance & Human Resources	6.318.321	0,028%	n/a	n/a	n/a
Sigit Murtiyoso	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	6.318.741	0,028%	n/a	n/a	n/a
Bhimo Wikan Hantoro	Direktur Digital Bisnis Director of Digital Business	2.552.642	0,011%	n/a	n/a	n/a

Pembelian/Penjualan Saham Dewan Komisaris dan Direksi Purchase/Sale of Board of Commissioners and Board of Directors Shares

Sesuai dengan Peraturan OJK Nomor 11/POJK.04/2017 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka, setiap anggota Dewan Komisaris dan Direksi diwajibkan untuk menyampaikan informasi kepada Bank mengenai kepemilikan dan setiap perubahan kepemilikannya atas saham Bank paling lambat 3 (tiga) hari kerja setelah terjadinya transaksi. Selanjutnya, Bank wajib menyampaikan laporan kepada OJK atas transaksi tersebut selambat-lambatnya 10 (sepuluh) hari sejak terjadi transaksi.

According to OJK Regulation No. 11/POJK.04/2017 on Ownership Report or Any Change in Share Ownership of a Public Company, each member of the Board of Commissioners and Board of Directors is required to provide information to the Bank regarding ownership and any change in ownership of the Bank's shares no later than three (three) working days after the transaction. Additionally, the Bank is obligated to file a report to the OJK within ten (ten) days after the transaction.

Tahun 2021, sejalan dengan pelaksanaan MESOP dan HMETD, kepemilikan saham oleh Dewan Komisaris dan Direksi Bank mengalami perubahan dengan rincian sebagai berikut:

Purchase of shares by the Board of Commissioners and the Board of Directors in connection with the 2021 MESOP & Pre-emptive Rights.

Nama Name	Jabatan Position	Transaksi Transaction	Jumlah Saham Sebelum Transaksi Number of Shares Before Transaction	Jumlah Pembelian/ Penjualan Number of Purchases/ Sales	Harga Saham Stock price	Jumlah Saham Setelah Transaksi Number of Shares After Transaction	Tanggal Transaksi Transaction date	Tujuan Transaksi Transaction Purpose	Pelaporan Reporting
Budi Satria	Komisaris Utama President Commissioner	Beli/Buy Beli/Buy	0 1.288.800	1.288.800 62.654	295 1.100	1.288.800 1.351.453		MESOP Right Issue	
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	-							
Rina Saadah	Komisaris Independen Independent Commissioner	-							
Rama Notowidigdo	Komisaris Independen Independent Commissioner	-							
Achmad F.C Barir	Komisaris Commissioner	Beli/Buy Beli/Buy	0 1.159.900	1.159.900 56.388	295 1.100	1.159.900 1.216.287		MESOP Right Issue	
Kaspar Situmorang	Direktur Utama President Director	Beli/Buy Beli/Buy	0 2.864.000	2.864.100 139.237	295 1.100	2.864.000 3.003.336		MESOP Right Issue	
Arif Wicaksono	Direktur Keuangan dan Operasional Director of Finance and Operations	Beli/Buy Beli/Buy	0 2.434.300	2.434.300 118.342	295 1.100	2.434.300 2.552.642		MESOP Right Issue	IDX

Nama Name	Jabatan Position	Transaksi Transaction	Jumlah Saham Sebelum Transaksi Number of Shares Before Transaction	Jumlah Pembelian/ Penjualan Number of Purchases/ Sales	Harga Saham Stock price	Jumlah Saham Setelah Transaksi Number of Shares After Transaction	Tanggal Transaksi Transaction date	Tujuan Transaksi Transaction Purpose	Pelaporan Reporting
Ernawan	Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i> Director of Enterprise Risk Management, Compliance & Human Resources	Jual/Sell Beli/Buy Beli/Buy	4.591.100 3.591.100 6.025.400	1.000.000 2.434.300 292.922	1.855 295 1.100	3.591.100 6.025.400 6.318.321		Investasi <i>MESOP Right Issue</i>	IDX
Sigit Murtiyoso	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	Jual/Sell Beli/Buy Beli/Buy	4.591.500 3.591.500 6.025.800	1.000.000 2.434.300 292.941	1.860 295 1.100	3.591.500 6.025.800 6.318.741		Investasi <i>MESOP Right Issue</i>	IDX
Bhimo Wikan Hantoro	Direktur Digital Bisnis Director of Digital Business	Jual/Sell Beli/Buy Beli/Buy	215.500 0 2.434.300	215.500 2.434.300 118.342	1.870 295 1.100	0 2.434.300 2.552.642		Investasi <i>MESOP Right Issue</i>	

Rangkap Jabatan Dewan Komisaris dan Direksi Position of the Board of Commissioners and the Board of Directors concurrently

Sesuai Peraturan OJK Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, anggota Dewan Komisaris dan Direksi Bank Raya dapat memiliki rangkap jabatan dengan ketentuan sebagai berikut:

Ketentuan rangkap jabatan Dewan Komisaris

- Anggota Dewan Komisaris dapat merangkap jabatan sebagai:
 - Anggota Direksi paling banyak pada 2 (dua) Emiten atau Perusahaan Publik lain; dan
 - Anggota Dewan Komisaris paling banyak pada 2 (dua) Emiten atau Perusahaan Publik lain.
- Dalam hal anggota Dewan Komisaris tidak merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris yang bersangkutan dapat merangkap jabatan sebagai anggota Dewan Komisaris paling banyak pada 4 (empat) Emiten atau Perusahaan Publik lain.

In line with FSA Regulation 33/POJK.04/2014 on the Boards of Directors and Commissioners of Issuers or Public Companies, members of Bank Raya's Board of Commissioners and Board of Directors may hold concurrent posts under the following conditions:

Provisions for Concurrent Board of Commissioners Posts

- Members of the Board of Commissioners may serve in the following capacities concurrently:
 - Members of the Board of Directors of no more than two (two) different Issuers or Public Companies; and
 - Members of the Board of Commissioners of no more than two (2) additional Issuers or Public Companies.
- In the absence of concurrent seats on the Board of Directors, a member of the Board of Commissioners may serve as a member of the Board of Commissioners in a maximum of four (four) additional Issuers or Public Companies.

3. Anggota Dewan Komisaris dapat merangkap sebagai anggota komite paling banyak pada 5 (lima) komite di Emiten atau Perusahaan Publik dimana yang bersangkutan juga menjabat sebagai anggota Direksi atau anggota Dewan Komisaris.

Ketentuan rangkap jabatan Direksi

1. Anggota Direksi dapat merangkap jabatan sebagai:
- anggota Direksi paling banyak pada 1 (satu) Emiten atau Perusahaan Publik lain;
 - anggota Dewan Komisaris paling banyak pada 3 (tiga) Emiten atau Perusahaan Publik lain; dan/atau
 - anggota komite paling banyak pada 5 (lima) komite di Emiten atau Perusahaan Publik dimana yang bersangkutan juga menjabat sebagai anggota Direksi atau anggota Dewan Komisaris.

Pengungkapan rangkap jabatan anggota Dewan Komisaris dan Direksi Bank Raya tahun 2021 sebagai berikut:

3. Members of the Board of Commissioners may serve on a maximum of five (five) committees within the Issuer or Public Company if they are also members of the Board of Directors or the Board of Commissioners.

Provisions for concurrent Board of Directors posts

1. Members of the Board of Directors may serve in the following capacities concurrently:
- Members of the Board of Directors of no more than one (one) other Issuer or Public Company;
 - Members of the Board of Commissioners of a maximum of three (three) additional Issuers or Public Companies; and/or
 - Members of a maximum of five (five) committees of the Issuer or Public Company, if the individual is also a member of the Board of Directors or the Board of Commissioners.

The following table details the concurrent positions held by members of Bank Raya's Board of Commissioners and Board of Directors in 2021:

Nama Name	Jabatan Position	Rangkap Jabatan Double Job		
		Dewan Komisaris Board of Commissioners	Direksi Directors	Komite Committee
Budi Satria	Komisaris Utama President Commissioner	-	-	- Anggota Komite Remunerasi & Nominasi Bank Raya - Anggota Komite Pemantau Risiko Bank Raya
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	-	Direktur Utama PT Infoarta Pratama (Infobank)	- Member of Bank Raya Remuneration & Nomination Committee - Member of Bank Raya Risk Monitoring Committee
Rina Saadah	Komisaris Independen Independent Commissioner	-	-	- Anggota Komite Remunerasi & Nominasi Bank Raya - Anggota Komite Audit Bank Raya - Ketua Komite Pemantau Risiko Bank Raya
				- Member of Bank Raya Remuneration & Nomination Committee - Member of the Bank Raya Audit Committee - Chairman of Bank Raya Risk Monitoring Committee
				- Ketua Komite Audit Bank Raya - Anggota Komite Pemantau Risiko Bank Raya
				- Chairman of the Bank Raya Audit Committee - Member of Bank Raya Risk Monitoring Committee

Nama Name	Jabatan Position	Rangkap Jabatan Double Job		
		Dewan Komisaris Board of Commissioners	Direksi Directors	Komite Committee
Rama Notowidigdo	Komisaris Independen Independent Commissioner	-	Direktur Utama PT Kreasi Nostra Mandiri (Sayurbox)	1. Ketua Komite Remunerasi & Nominasi Bank Raya Chairman of the Remuneration & Nomination Committee of Bank Raya
Achmad F.C Barir	Komisaris Commissioner	-	-	1. Anggota Komite Pemantau Risiko Bank Raya Member of Bank Raya Risk Monitoring Committee
Kaspar Situmorang	Direktur Utama President Director	-	-	-
Arif Wicaksono	Direktur Keuangan dan Operasional Director of Finance and Operations	-	-	-
Ernawan	Direktur Enterprise Risk Management, Compliance & Human Resource Director of Enterprise Risk Management, Compliance & Human Resources	-	-	-
Sigit Murtiyoso	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	-	-	-
Bhimo Wikan Hantoro	Direktur Digital Bisnis Director of Digital Business	-	-	-

Hubungan Afiliasi Dewan Komisaris, Direksi dan Pemegang Saham Pengendali Board of Commissioners, Board of Directors, and Controlling Shareholders Affiliated Relationships

Mengenai hubungan afiliasi Dewan Komisaris dan Direksi juga telah diatur dalam Peraturan OJK Nomor 55/POJK.03 tahun 2016 tentang GCG Bank Umum pasal 29 yaitu mayoritas anggota Dewan Komisaris dan Direksi dilarang saling memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Dewan Komisaris dan/atau anggota Direksi serta pasal 39 ayat 2 mengenai aspek transparansi Dewan Komisaris dan Direksi yaitu anggota Dewan Komisaris dan Direksi wajib mengungkapkan hubungan keuangan dan hubungan keluarga dengan anggota Dewan Komisaris lain, anggota Direksi dan/atau Pemegang Saham pengendali Bank.

Concerning the affiliation relationship between the Board of Commissioners and the Board of Directors, FSA Regulation Number 55/POJK.03 of 2016 concerning GCG for Commercial Banks, article 29, provides that the majority of members of the Board of Commissioners and the Board of Directors are prohibited from having family relationships with fellow members of the Board of Commissioners and/or members of the Board of Directors up to the second degree.

Hubungan Keuangan dan Keluarga Dewan Komisaris dan Direksi Financial and Family Relations of the Board of Commissioners and the Board of Directors												
Nama Name	Hubungan Keuangan Dengan Financial Relationship With						Hubungan Keuangan Dengan Financial Relationship With					
	Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Pemegang Saham Utama/ Pengendali Major/ Controlling Shareholders		Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Pemegang Saham Utama/ Pengendali Major/ Controlling Shareholders	
	Ya Yes	Tidak Not	Ya Yes	Tidak Not	Ya Yes	Tidak Not	Ya Yes	Tidak Not	Ya Yes	Tidak Not	Ya Yes	Tidak Not
Dewan Komisaris Board of Commissioners												
Budi Satria		√		√		√		√		√		√
Eko B. Supriyanto		√		√		√		√		√		√
Rina Saadah		√		√		√		√		√		√
Rama Notowidigdo		√		√		√		√		√		√
Achmad F.C Barir		√		√		√		√		√		√
Direksi Board of Directors												
Kaspar Situmorang		√		√		√		√		√		√
Arif Wicaksono		√		√		√		√		√		√
Ernawan		√		√		√		√		√		√
Sigit Murtiyoso		√		√		√		√		√		√
Bhimo Wikan Hantoro		√		√		√		√		√		√

Kebijakan Keberagaman Dewan Komisaris dan Direksi Board of Commissioners and Board of Directors Diversity Policy

Keberagaman komposisi Dewan Komisaris dan Direksi telah diatur dalam Lampiran Surat Edaran OJK Nomor 32/SE/OJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka dinyatakan komposisi anggota Dewan Komisaris dan Direksi memperhatikan keberagaman komposisi anggota Dewan Komisaris.

Bank Raya menyadari hal tersebut dan senantiasa menyelaraskan kondisi tersebut dengan perusahaan agar seluruh organ perusahaan dapat bersinergi dengan baik dan memberikan hasil kinerja yang optimal, salah satunya adalah dengan penetapan komposisi Dewan Komisaris dan Direksi yang dilakukan dengan mempertimbangkan kebutuhan dan kompleksitas perusahaan. Komposisi Dewan Komisaris dan Direksi didasarkan pada pengetahuan, keahlian, pengalaman profesional, latar belakang guna mendukung efektivitas pelaksanaan tugas Dewan Komisaris dan Direksi.

The variety of the membership of the Board of Commissioners and the Board of Directors is governed in the Attachment to OJK Circular Letter 32/SE/OJK.04/2015 on Guidelines for Public Company Governance.

Bank Raya is aware of this and is constantly aligning these conditions with the company in order for all company organs to function optimally and deliver optimal performance results, one of which is the composition of the Board of Commissioners and the Board of Directors, which is determined by taking into account the company's needs and complexity. The Board of Commissioners and the Board of Directors are composed of individuals who possess the necessary knowledge, skills, professional experience, and background to ensure the Board of Commissioners' and Board of Directors' functions are carried out effectively.

No.	Nama Name	Jabatan Position	Usia (tahun) Age (year)	Jenis Kelamin Gender	Pendidikan Terakhir Last education	Pengalaman Kerja Work experience
1.	Budi Satria	Komisaris Utama President	58	Pria	Magister Management dari Universitas Indonesia	- Kepala Divisi di Divisi Sekretariat Perusahaan BRI - Kepala Kantor Wilayah Jakarta 1 BRI - Direktur Consumer Banking BTN
		Commissioner		Male	Master of Management from University of Indonesia	- Head of Division at BRI's Corporate Secretariat Division - Head of BRI's Jakarta 1 Regional Office - Director of Consumer Banking BTN
2.	Eko B. Supriyanto	Komisaris Independen	57	Pria	Magister Manajemen dari Universitas Trisakti	- Komisaris Independen Bank Raya (2021 - Sekarang) - Direktur Utama PT Infoarta Pratama (Infobank) (2015-Sekarang) - Komisaris Utama PT Bank MNC Internasional Tbk (2016-2018) - Komisaris Independen PT Bank Mutiara Tbk (2009-2015)
		Independent Commissioner		Male	Master of Management from Trisakti University	- Independent Commissioner of Bank Raya (2021 - Present) - President Director of PT Infoarta Pratama (Infobank) (2015-present) - President Commissioner of PT Bank MNC International Tbk (2016-2018) - Independent Commissioner of PT Bank Mutiara Tbk (2009-2015)
3.	Rina Saadah	Komisaris Independen	31	Wanita	Magister Sains dari Universitas Indonesia	- Tenaga Ahli Menpora - Tenaga Ahli Komite Olimpiade - Penasehat Ahli Menteri Kelautan dan Perikanan
		Independent Commissioner		Female	Master of Science from University of Indonesia	- Minister of Youth and Sports - Olympic Committee Experts - Expert Advisor to the Minister of Marine Affairs and Fisheries
4.	Rama Notowidigdo	Komisaris Independen	48	Pria	Sarjana Computer Information System, Missouri State University, USA (1994) MBA, Saint Louis University, USA	- Direktur Awan Tunai - Advisor OY Indonesia - Direktur PT Kreasi Nostra Mandiri (Sayurbox)
		Independent Commissioner		Male	Bachelor of Computer Information System, Missouri State University, USA (1994) MBA, Saint Louis University, USA	- Director of Awan Tunai - OY Indonesia advisor - Director of PT Kreasi Nostra Mandiri (Sayurbox)

No.	Nama Name	Jabatan Position	Usia (tahun) Age (year)	Jenis Kelamin Gender	Pendidikan Terakhir Last education	Pengalaman Kerja Work experience
5.	Achmad F.C Barir.	Komisaris	56	Pria	MM Agribisnis dari Institut Pertanian Bogor	- Group Head Analisis Risiko Agribisnis BRI - Wakil Pemimpin Wilayah Kanwil BRI Aceh - <i>Wholesale Credit Risk Analyst Division Head BRI</i>
		Commissioner		Male	MM Agribusiness from Bogor Agricultural University	- BRI's Agribusiness Risk Analysis Group Head - Deputy Regional Head of the BRI Aceh Regional Office - Wholesale Credit Risk Analyst Division Head BRI
6.	Kaspar Situmorang	Direktur Utama	36	Pria	Magister Teknik Komputer, University of Duisburg-Essen, Germany	- Kepala Divisi <i>Digital Banking Development & Operation</i> - Komisaris PT Fintek Karya Nusantara
		President Director		Male	Master in Computer Engineering, University of Duisburg-Essen, Germany	- Head of Digital Banking Development & Operation Division - Commissioner of PT Fintek Karya Nusantara
7.	Arif Wicaksono.	Direktur Keuangan dan Operasional	56	Pria	<i>Magister Information System</i> dari Adger University College, Norway	- Wakil Pemimpin Wilayah Bidang Operasional Kanwil Pekanbaru - Wakil Pemimpin Wilayah Bidang Operasional Kanwil Denpasar - Kepala Divisi Retail Payment BRI
		Director of Finance and Operations		Male	Master in Information Systems from Adger University College, Norway	- Deputy Regional Head for Pekanbaru Regional Office Operations - Deputy Regional Head for Denpasar Regional Office Operations - Head of BRI Retail Payment Division
8.	Ernawan	Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i>	58	Pria	Magister jurusan Agribisnis di Institut Pertanian Bogor	- Kepala Divisi Akuntansi Manajemen & Keuangan - Kepala Divisi <i>Assets & Liabilities Management</i> - Direktur Operasional dan Keuangan Bank Raya
		Director of Enterprise Risk Management, Compliance & Human Resources		Male	Master in Agribusiness at Bogor Agricultural Institute	- Head of Management & Finance Accounting Division - Head of Assets & Liabilities Management Division - Director of Operations and Finance of Bank Raya

No.	Nama Name	Jabatan Position	Usia (tahun) Age (year)	Jenis Kelamin Gender	Pendidikan Terakhir Last education	Pengalaman Kerja Work experience
9.	Sigit Murtiyoso.	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	56	Pria Male	Sarjana jurusan Hukum dari Universitas Sebelas Maret - Surakarta Bachelor's degree in Law from Sebelas Maret University - Surakarta	- Direktur Bisnis Bank Raya - Pemimpin Kantor Cabang Khusus BRI - Bank Raya Business Director - Head of BRI Special Branch Office
10.	Bhimo Wikan Hantoro.	Direktur Digital Bisnis Director of Digital Business	36	Pria Male	Master of Science (M.Sc) Electrical Engineering dari Delft University of Technology - Belanda Master of Science (M.Sc) Electrical Engineering from Delft University of Technology - Netherlands	- Senior Vice President Innovation, PT Pegadaian (Persero) - Konsultan Accenture Belanda - Senior Vice President of Innovation, PT Pegadaian (Persero) - Netherlands Accenture Consultant

Penilaian Kemampuan dan Kepatutan Fit and Proper Test

Peraturan OJK Nomor 27/POJK.03/2016 tentang penilaian Kemampuan dan Kepatutan Bagi pihak Utama Lembaga Jasa Keuangan menjabarkan mengenai pertimbangan pengelola/pengurus lembaga keuangan harus memenuhi persyaratan kemampuan dan kepatutan bagi anggota Direksi dan Dewan Komisaris dalam melakukan tindakan, tugas dan fungsinya. Persyaratan penilaian mencakup integritas dan kelayakan/ reputasi keuangan dan kompetensi calon pengurus bank (Direksi dan Dewan Komisaris).

Dasar pengangkatan dan persetujuan Uji Kemampuan dan Kepatutan OJK tiap anggota Dewan Komisaris dan Direksi, adalah sebagaimana tabel di bawah ini:

OJK Regulation 27/POJK.03/2016 on the Fit and Proper Test for the Principal Parties of Financial Services Institutions details the factors that financial institution managers must consider when carrying out their actions, duties, and functions as members of the Board of Directors and Board of Commissioners. The assessment criteria include the prospective bank managers' integrity, feasibility, financial reputation, and competence (Board of Directors and Board of Commissioners).

The following table details the criteria used to appoint and approve members of the Board of Commissioners and the Board of Directors who pass the OJK Fit and Proper Test:

Nama Name	Jabatan Position	Status Status	Keterangan Description
Budi Satria	Komisaris Utama President Commissioner	Lulus Passed	Nokep. 63/D.03/2021 tanggal 2 Juni 2020 Nokep. 63/D.03/2021 dated June 2, 2020
Eko B. Supriyanto.	Komisaris Independen Independent Commissioner	Lulus Passed	Nokep. 110/D.03/2021 tanggal 23 Juli 2021 Nokep. 110/D.03/2021 July 23, 2021
Rina Saadah.	Komisaris Independen Independent Commissioner	Lulus Passed	Nokep. 108/D.03/2021 tanggal 19 Juli 2021 Nokep. 108/D.03/2021 July 19, 2021

Nama Name	Jabatan Position	Status Status	Keterangan Description
Rama Notowidigdo.	Komisaris Independen Independent Commissioner	Lulus Passed	Nokep. 107/D.03/2021 tanggal 19 Juli 2021 Nokep. 107/D.03/2021 dated 19 July 2021
Achmad F.C Barir.	Komisaris Commissioner	Lulus Passed	Nokep. 106/D.03/2021 tanggal 19 Juli 2021 Nokep. 106/D.03/2021 July 19, 2021
Kaspar Situmorang	Direktur Utama President Director	Lulus Passed	Nokep. 83/D.03/2021 tanggal 29 Juni 2021 Nokep. 83/D.03/2021 dated June 29, 2021
Arif Wicaksono.	Direktur Keuangan dan Operasional Director of Finance and Operations	Lulus Passed	Nokep. 120/D.03/2020 tanggal 25 Agustus 2020 Nokep. 120/D.03/2020 August 25, 2020
Ernawan	Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i> Director of Enterprise Risk Management, Compliance & Human Resources	Lulus Passed	Nokep. 126/D.03/2019 tanggal 18 Juli 2019 Nokep. 126/D.03/2019 dated 18 July 2019
Sigit Murtiyoso.	Direktur Retail Agri dan Pendanaan Director of Retail Agri and Funding	Lulus Passed	Nokep. 180/D.03/2019 tanggal 30 September 2019 Nokep. 180/D.03/2019 on 30 September 2019
Bhimo Wikan Hantoro.	Direktur Digital Bisnis Director of Digital Business	Lulus Passed	Nokep. 109/D.03/2021 tanggal 19 Juli 2021 Nokep. 109/D.03/2021 dated 19 July 2021

Sertifikasi Manajemen Risiko Certification in Risk Management

Dengan semakin kompleksnya kegiatan usaha perbankan akan menyebabkan risiko yang dihadapi juga semakin besar sehingga untuk mendukung pelaksanaan dan pengelolaan manajemen risiko dalam Perseroan diperlukan pengurus dan pejabat bank yang memiliki kompetensi dan keahlian dalam bidang manajemen risiko.

Sebagaimana diatur dalam peraturan Bank Indonesia Nomor 11/19/PBI/2009 tentang Sertifikasi Manajemen risiko bagi pengurus dan pejabat Bank Umum, Dewan Komisaris dan Direksi wajib memiliki Sertifikat Manajemen risiko yang diterbitkan oleh Lembaga Sertifikasi profesi, dengan klasifikasi sebagai berikut:

With the rising complexity of banking business operations, the risks are also increasing, necessitating the hiring of bank administrators and officers with risk management competence and knowledge to assist in the implementation and administration of risk management inside the Company.

As stipulated in Bank Indonesia regulation No. 11/19/PBI/2009 on Risk Management Certification for Commercial Banks' management and officers, the Board of Commissioners and the Board of Directors are required to possess a Risk Management Certificate issued by a Professional Certification Agency with the following classification:

Nama Name	Jabatan Position	Sertifikasi Certification	Lembaga yang Mengeluarkan Issuing Agency	Masa Berlaku Validity period
Budi Satria	Komisaris Utama President Commissioner	Manajemen Risiko Level 5 Risk Management Level 5	LSPP	2 Tahun 2 years
Eko B. Supriyanto.	Komisaris Independen Independent Commissioner	Manajemen Risiko Level 2 Komisaris Risk Management Level 2 Commissioner	LSPP	4 Tahun 4 years
Rina Saadah.	Komisaris Independen Independent Commissioner	Manajemen Risiko Level 2 Komisaris Risk Management Level 2 Commissioner	LSPP	4 Tahun 4 years

Nama Name	Jabatan Position	Sertifikasi Certification	Lembaga yang Mengeluarkan Issuing Agency	Masa Berlaku Validity period
Rama Notowidigdo.	Komisaris Independen Independent Commissioner	Manajemen Risiko Level 2 Komisaris Risk Management Level 2 Commissioner	LSPP	4 Tahun 4 years
Achmad F.C Barir.	Komisaris Commissioner	Manajemen Risiko Level 4 Risk Management Level 4	LSPP	2 Tahun 2 years
Kaspar Situmorang	Direktur Utama President Director	Manajemen Risiko Level 5 Risk Management Level 5	LSPP	2 Tahun 2 years
Arif Wicaksono.	Direktur Keuangan dan Operasional Director of Finance and Operations	Manajemen Risiko Level 5 Risk Management Level 5	LSPP	2 Tahun 2 years
Ernawan	Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i> Director of Enterprise Risk Management, Compliance & Human Resource	Manajemen Risiko Level 5 Risk Management Level 5	LSPP	2 Tahun 2 years
Sigit Murtiyoso.	Direktur Retail Agri dan Pendanaan Director of Agri Retail and Funding	Manajemen Risiko Level 5 Risk Management Level 5	LSPP	2 Tahun 2 years
Bhimo Wikan Hantoro.	Direktur Digital Bisnis Director of Digital Business	Manajemen Risiko Level 5 Risk Management Level 5	BSMR	2 Tahun 2 years

Dalam hal masa berlaku sertifikasi tersebut telah habis, maka wajib dilakukan program pemeliharaan (*refreshment*) secara berkala minimal 1 (satu) kali dalam 4 (empat) tahun untuk tingkat 1 dan 2; atau 1 (satu) kali dalam 2 (dua) tahun untuk tingkat 3, 4 dan 5.

If the certification's validity term has expired, a periodic refreshment programme must be completed at least once every four years for levels 1 and 2; or once every two years for levels 3, 4, and 5.

Nominasi dan Remunerasi Dewan Komisaris dan Direksi

Nomination and Remuneration of The Commissioners and Directors

Pengangkatan anggota Dewan Komisaris dan Direksi serta penetapan besaran remunerasi bagi anggota Dewan Komisaris dan Direksi merupakan wewenang pemegang saham melalui mekanisme RUPS.

The shareholders, through the GMS mechanism, have the authority to appoint members of the Board of Commissioners and the Board of Directors, as well as to determine the amount of remuneration paid to members of the Board of Commissioners and Board of Directors.

Nominasi Dewan Komisaris dan Direksi

Nominations for the Board of Commissioners and the Board of Directors'

Anggota Dewan Komisaris dan Direksi Bank Raya diangkat dan diberhentikan oleh RUPS. Pemegang Saham Pengendali dapat mengusulkan nama-nama calon anggota Dewan Komisaris dan Direksi Perseroan untuk kemudian dilakukan pembahasan oleh Komite Nominasi dan Remunerasi. Selain itu, calon anggota Dewan Komisaris dan Direksi Bank Raya juga dapat berasal dari sumber lainnya.

The GMS appoints and dismisses members of Bank Raya's Board of Commissioners and Board of Directors. The Controlling Shareholder may submit names of candidates for the Board of Commissioners and the Board of Directors of the Company to the Nomination and Remuneration Committee for consideration. Additionally, candidates for Bank Raya's Board of Commissioners and Board of Directors may originate from outside sources.

Nama-nama yang diusulkan sebagai calon anggota Dewan Komisaris dan Direksi Bank Raya harus memenuhi kriteria yang ditetapkan dalam Pedoman dan Tata Kerja Dewan Komisaris dan Pedoman dan Tata Kerja Direksi, yaitu:

The names proposed as candidates for members of Bank Raya's Board of Commissioners and Board of Directors must meet the criteria outlined in the Board of Commissioners' Guidelines and Work Procedures and the Board of Directors' Guidelines and Work Procedures, respectively, namely:

Kriteria Dewan Komisaris

Berdasarkan Anggaran Dasar, yang dapat diangkat sebagai anggota Dewan Komisaris adalah orang perseorangan, yang memenuhi persyaratan pada saat diangkat dan selama menjabat:

1. Wajib memenuhi ketentuan dalam :
 - UUPT
 - Peraturan perundang-undangan di bidang pasar modal
 - Peraturan perundang-undangan lain yang berlaku yang terkait dengan kegiatan usaha Perseroan
2. Mempunyai akhlak, moral dan integritas yang baik
3. Cakap melakukan perbuatan hukum
4. Dalam waktu 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
 - a. Tidak pernah dinyatakan pailit
 - b. Tidak pernah menjadi anggota Direksi dan atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit
 - c. Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/ atau yang berkaitan dengan sektor keuangan
 - d. Tidak pernah menjadi anggota Dewan Komisaris yang selama menjabat:
 - Pernah tidak menyelenggarakan RUPS tahunan
 - Pertanggungjawabannya sebagai anggota Direksi dan/ atau anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberi pertanggungjawaban sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada RUPS.

Criteria for the Board of Commissioners

According to the Articles of Association, individuals may be appointed as members of the Board of Commissioners if they meet the following criteria at the time of appointment and throughout their tenure:

1. S/he must adhere to the requirements of:
 - UPUT
 - Capital market legislation
 - Additional relevant rules and regulations governing the Company's business operations
2. S/he possesses sound morals, ethics, and integrity
3. S/he is capable of bringing legal proceedings
4. Within five (five) years of appointment and throughout service:
 - a. S/he never declared insolvent
 - b. S/he never served on a Board of Directors or a Board of Commissioners when a member was found guilty of causing a corporation to be declared bankrupt.
 - c. S/he has never been convicted of a crime that was damaging to the state's finances or to the financial industry.
 - d. S/he has never been a member of the Board of Commissioners who was responsible for the following during his tenure:
 - There has never been an annual GMS
 - His/her obligations as a member of the Board of Directors and/or the Board of Commissioners were never accepted by the GMS or did not include responsibility to the GMS as a member of the Board of Directors and/or the Board of Commissioners.

- Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan atau pendaftaran dari OJK tidak memenuhi kewajiban menyampaikan laporan tahunan dan/atau laporan keuangan kepada OJK.
- 5. Tidak menjabat sebagai anggota Dewan Komisaris pada Perseroan selama 2 (dua) periode berturut-turut.
- 6. Memiliki komitmen untuk mematuhi peraturan perundang-undangan
- 7. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan Perseroan
- 8. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan atau mengawasi kegiatan Perseroan dalam waktu 6 (enam) bulan terakhir kecuali untuk pengangkatan kembali sebagai Komisaris Independen Perseroan pada periode berikutnya.
- 9. Tidak mempunyai saham baik langsung maupun tidak langsung pada Perseroan, tidak mempunyai hubungan afiliasi dengan Perseroan, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham utama Perseroan.
- 10. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Perseroan.
- S/he has resulted in a firm that has acquired a permission, approval, or registration from the FSA failing to comply with the FSA's annual report and/or financial report requirements.
- 5. S/he does not serve as a member of the Company's Board of Commissioners for two (two) consecutive terms.
- 6. S/he has a commitment to following all applicable laws and regulations
- 7. S/he does possess knowledge and/or skill in the sectors in which the Company requires expertise
- 8. S/he is not a person who has worked for the Company or has the power and duty to plan, lead, control, or oversee its operations in the preceding six (six) months, save for reappointment as an Independent Commissioner in the subsequent term.
- 9. S/he does not own shares in the Company, either directly or indirectly, and has no association with the Company, its Board of Commissioners, Board of Directors, or key shareholders.
- 10. S/he has no commercial link with the Company, either directly or indirectly.

Kriteria Direksi

Pedoman Kerja Direksi telah mengatur mengenai persyaratan pengangkatan anggota Direksi yaitu:

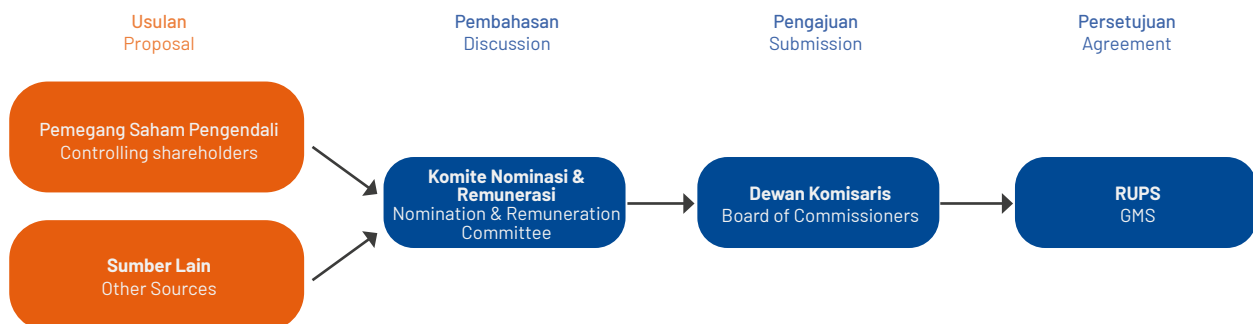
1. Mempunyai akhlak, moral, dan integritas yang baik;
2. Cakap melakukan perbuatan hukum;
3. Dalam waktu 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
 - a) Tidak pernah dinyatakan pailit
 - b) Tidak pernah menjadi anggota Direksi dan atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit
 - c) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/ atau yang berkaitan dengan sektor keuangan
 - d) Tidak pernah menjadi anggota Dewan Komisaris yang selama menjabat:
 - Pernah tidak menyelenggarakan RUPS tahunan
 - Pertanggungjawabannya sebagai anggota Direksi dan/ atau anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberi pertanggungjawaban sebagai anggota Direksi dan/ atau anggota Dewan Komisaris kepada RUPS
 - Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada OJK.

Criteria for the Board of Directors

The Board of Directors Work Guidelines established the criteria for appointing members of the Board of Directors, including the following:

1. S/he demonstrates a strong sense of morality, ethics, and integrity;
2. S/he is capable of enforcing the law;
3. Within the preceding five (five) years of appointment and during service:
 - a) S/he never had a bankruptcy issued against them
 - b) S/he never served on the Board of Directors or the Board of Commissioners of a company that was found guilty of causing the company to be declared bankrupt.
 - c) S/he has never been convicted of a crime that was damaging to the state's finances or to the financial industry.
 - d) S/he has never served on a Board of Commissioners during his tenure that included the following:
 - There was never a GMS conducted annually
 - His/her responsibilities as a member of the Board of Directors and/or the Board of Commissioners have never been accepted by the GMS or have not required him to be accountable to the GMS as a member of the Board of Directors and/or the Board of Commissioners.
 - S/he has ever been responsible for a firm that acquired a permission, approval, or registration from the Financial Services Authority failing to comply with the duty to submit an Annual Report and/or Financial Report to the FSA.

- Memiliki komitmen untuk mematuhi peraturan perundang-undangan
 - Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan Perseroan
4. Bukan pengurus partai politik, dan/atau anggota legislatif, dan/atau tidak sedang mencalonkan diri sebagai calon anggota legislatif
 5. Bukan kepala/wakil kepala daerah dan/atau tidak sedang mencalonkan diri sebagai calon kepala/ wakil kepala daerah
 6. Berusia tidak melebihi 58 tahun ketika akan menjabat Direksi
 7. Tidak sedang menjabat sebagai pejabat pada Lembaga, anggota Dewan Komisaris/Dewan Pengawas pada BUMN , anggota Direksi pada BUMN , anak perusahaan dan/atau perusahaan, kecuali menandatangani surat pernyataan bersedia mengundurkan diri dari jabatan tersebut jika terpilih sebagai anggota Direksi anak perusahaan.
 8. Tidak sedang menduduki jabatan yang berdasarkan peraturan perundang-undangan dilarang untuk dirangkap dengan jabatan anggota Direksi, kecuali menandatangani surat pernyataan bersedia mengundurkan diri dari jabatan tersebut jika terpilih sebagai anggota Direksi.
 9. Tidak menjabat sebagai anggota Direksi pada perusahaan yang bersangkutan selama 2 (dua) periode berturut-turut.
 10. Sehat jasmani dan rohani (tidak sedang menderita suatu penyakit yang dapat menghambat pelaksanaan tugas sebagai anggota Direksi) yang dibuktikan dengan surat keterangan sehat dari rumah sakit pemerintah
 11. Tidak termasuk dalam daftar tidak lulus uji kemampuan dan kepatutan (*fit and proper test*);
 12. Diangkat melalui RUPS.
- S/he demonstrates a dedication to adhering to applicable laws and regulations
 - S/he does possess knowledge and/or skill in the area in which the Company requires expertise.
4. S/he is not an administrator of a political party, and/or not a member of the legislature, and/or not presently competing for a seat in the legislature
 5. S/he is not the region's head/deputy head and/or not a candidate for the region's head/deputy head at the moment
 6. His/her age should not exceed 58 years while sitting on the Board of Directors.
 7. S/he is not currently serving as an official of the Institution, a member of the Board of Commissioners/Supervisory Board of a BUMN, or a member of the Board of Directors of a SOEs, a subsidiary, or a company, unless he signs a statement indicating his willingness to resign from the position if elected to the Board of Directors of a subsidiary.
 8. S/he is not currently holding a position that, under applicable laws and regulations, precludes him from serving on the Board of Directors concurrently, except by signing a statement indicating his willingness to resign from the position if elected to the Board of Directors.
 9. S/he is absence from the Board of Directors of the corporation in question for a period of two (two) consecutive years.
 10. S/he is physically and mentally sound (free of illness that would impair performance of duties as a member of the Board of Directors), as evidenced by a health certificate from a government hospital.
 11. S/he is excluded from the list of those who do not pass the fitness and propriety test;
 12. S/he is appointed by the GMS.



Setelah dilakukan pembahasan oleh Komite Nominasi dan Remunerasi, kemudian nama calon anggota Dewan Komisaris dan Direksi diajukan kepada Dewan Komisaris untuk dimintakan persetujuannya pada saat RUPS.

The Nomination and Remuneration Committee recommends candidates for members of the Board of Commissioners and the Board of Directors to the Board of Commissioners for approval at the GMS.

Remunerasi Dewan Komisaris dan Direksi

Remuneration of the Board of Commissioners and the Board of Directors

Besaran remunerasi serta fasilitas lain yang diberikan bagi Dewan Komisaris dan Direksi ditetapkan oleh RUPS Tahunan dengan memperhatikan rekomendasi dari Komite Remunerasi dan Nominasi.

The Annual GMS determines the amount of salary and other benefits awarded to the Board of Commissioners and the Board of Directors, taking into consideration the Remuneration and Nomination Committee's recommendations.

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

Prosedur penetapan remunerasi Dewan Komisaris dan Direksi Perseroan adalah sebagai berikut:

- Pemegang Saham melakukan pembahasan pada RUPS
- RUPS memberikan wewenang dan kuasa kepada Dewan Komisaris untuk menetapkan besaran remunerasi.
- Komite Remunerasi dan Nominasi melakukan kajian dan evaluasi untuk menentukan remunerasi bagi Dewan Komisaris dan Direksi.
- Komite Remunerasi dan Nominasi memberikan rekomendasi kepada Dewan Komisaris
- Dewan Komisaris melakukan pembahasan atas usulan Komite Remunerasi dan Nominasi untuk kemudian diusulkan melalui surat kepada Pemegang Saham pengendali (Bank BRI).
- Surat penetapan oleh Pemegang Saham pengendali (Bank BRI) kepada Dewan Komisaris.
- Surat Dewan Komisaris kepada Direksi tentang penetapan remunerasi Dewan Komisaris dan Direksi.

Compensation Procedures for the Board of Commissioners and the Board of Directors

The following approach is used in establishing the compensation of the Company's Board of Commissioners and Directors:

- Shareholders have meetings at the GMS.
- The GMS vests the Board of Commissioners with power and authority to establish the amount of pay.
- The Remuneration and Nomination Committee conducts research and reviews in order to determine the compensation of the Board of Commissioners and Board of Directors.
- The Remuneration and Nomination Committee makes recommendations to the Board of Commissioners on compensation and nominations.
- The Board of Commissioners deliberates on the Remuneration and Nomination Committee's recommendation, which is subsequently communicated to the controlling shareholder through a letter (Bank BRI).
- Letter of decision to the Board of Commissioners from the controlling shareholder (Bank BRI).
- Letter from the Board of Commissioners to the Board of Directors addressing the Board of Commissioners' and Board of Directors' compensation.

Struktur Remunerasi Anggota Dewan Komisaris dan Direksi

Compensation Structure for Commissioners and Directors

Penerapan kebijakan remunerasi Dewan Komisaris Bank Raya mengacu pada ketentuan Peraturan OJK Nomor 45/POJK.03/2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum serta Surat Edaran OJK Nomor 40/SE0JK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi Bank Umum.

The Board of Commissioners of Bank Raya's remuneration policy is in accordance with the provisions of FSA Regulation 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks and OJK Circular Letter 40/SE0JK.03/2016 on the Implementation of Governance in the Provision of Bank Remuneration in General.

Berdasarkan kebijakan tersebut, Dewan Komisaris menerima paket remunerasi yang terdiri dari:

- Remunerasi yang bersifat tetap yaitu remunerasi yang tidak dikaitkan dengan kinerja dan risiko, antara lain honorarium dan tunjangan hari raya.
- Remunerasi yang bersifat variabel yaitu Remunerasi yang dikaitkan dengan kinerja dan risiko, antara lain jasa produksi atau bentuk lainnya yang dipersamakan dengan itu.

The Board of Commissioners is compensated in accordance with this policy with the following:

- Fixed Income, that is, compensation that is not contingent on performance or risk, such as honoraria and vacation allowances.
- Variable Income, i.e., compensation based on performance and risk, which may include production services or other comparable services.

No	Jenis Penghasilan/ Fasilitas Type of Income/Facilities	Direksi Directors	Dewan Komisaris Board of Commissioners
1	Honorarium	- Direktur Utama sebesar 100% - Direktur SDM 90% dari honorarium Direktur Utama - Direksi 85% dari honorarium Direktur Utama	- Komisaris Utama 45% dari gaji Direktur Utama. - Komisaris 90% dari honorarium Komisaris Utama
	Honorarium	- President Director at 100% - HR Director 90% of the honorarium of the President Director - Directors 85% of the honorarium of the President Director	- President Commissioner 45% of the salary of the President Director. - Commissioner 90% of the honorarium of the President Commissioner
2	Tunjangan Hari Raya Holiday allowance	Diberikan sebesar 1(satu) kali honorarium Awarded 1(one) time honorarium	Diberikan sebesar 1(satu) kali honorarium Awarded 1(one) time honorarium
	Tunjangan Transportasi Transportation Allowance	tidak diberikan karena sudah diberikan fasilitas COP not given because it has been given COP facilities	Diberikan sebesar 20% dari honorarium Given at 20% of the honorarium
	Tunjangan Purna Jabatan Post-Service Allowance	Diberikan selama menjabat premi asuransi 25% dari honorarium dalam satu tahun Given during tenure insurance premium 25% of the honorarium in one year	Diberikan selama menjabat premi asuransi 25% dari honorarium dalam satu tahun Given during tenure insurance premium 25% of the honorarium in one year
	Tunjangan Perumahan Housing Allowance	Sesuai ketentuan yang berlaku According to the current arrangment	-
	Tunjangan Komunikasi Communication Allowance	Sesuai ketentuan yang berlaku According to the current arrangment	-
3	Fasilitas Kesehatan	1. Fasilitas kesehatan rawat Inap dan rawat Jalan diberikan dalam bentuk penggantian biaya kesehatan. 2. Diberikan kepada Dewan Komisaris dan Direksi beserta keluarganya (pasangan dan maksimum 3 orang anak dibawah 25 tahun atau belum bekerja dan belum menikah) 3. Perawatan/Kesehatan Gigi 4. Penggantian Lensa dan bingkaiacamata	
	Facility Health	1. Inpatient and outpatient health facilities are provided in the form of reimbursement of health costs. 2. Given to the Board of Commissioners and Directors and their families (spouse and maximum 3 children under 25 years old or not working and not married) 3. Dental Care/Health 4. Lens and eyeglass frame replacement	
	Bantuan Hukum Legal Aid	Fasilitas bantuan hukum kepada anggota Dewan Komisaris dan Direksi diberikan sesuai kebutuhan Legal aid facilities to members of the Board of Commissioners and Board of Directors are provided as needed	
	Kendaraan Dinas	Program kepemilikan Mobil (<i>Car ownership program</i>) yang berlaku dengan ketentuan sebagai berikut: - peserta program berhak atas kepemilikan mobil dinas jabatan apabila telah menyelesaikan masa jabatannya selama 3 (tiga) tahun - BBM, pengemudi, Biaya pemeliharaan, Biaya pajak/STNK, biaya asuransi selama menjalankan tugas ditanggung perusahaan.	
	Official Vehicle	Car ownership program that applies with the following conditions : - program participants are entitled to ownership of official official cars if they have completed their term of office for 3(three) years - Fuel, driver, maintenance costs, tax fees / TNK fees, insurance costs while carrying out duties are borne by the company.	-

No	Jenis Penghasilan/ Fasilitas Type of Income/Facilities	Direksi Directors	Dewan Komisaris Board of Commissioners
4	Tantiem	Penetapan tantiem diberikan dalam bentuk tunai dengan mempertimbangkan peningkatan kinerja dan kemampuan perusahaan. The determination of tantiem is given in the form of cash taking into account the improvement of the company's performance and capabilities.	

Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

Indikator yang digunakan dalam menentukan remunerasi anggota Dewan Komisaris dan Direksi adalah sebagai berikut:

1. Key Performance Indicator (KPI) atau hasil penilaian kinerja dan prestasi Dewan Komisaris dan Direksi
2. Kinerja Bank
3. Perkembangan bisnis Bank
4. Hasil perbandingan remunerasi industri perbankan.
5. Pertimbangan sasaran dan strategi jangka panjang Perseroan

Indicator for Determining Board of Commissioners and Directors Remuneration

The following indicators are used to determine the compensation of members of the Board of Commissioners and Board of Directors:

1. Key Performance Indicators (KPIs) or the outcomes of the Board of Commissioners and the Board of Directors' performance and accomplishments
2. Performance of the Bank
3. Business growth for banks
4. Compensation outcomes in the banking business are compared.
5. Taking into account the Company's long-term objectives and plans

Jumlah Nominal/Komponen Remunerasi Dewan Komisaris dan Direksi Nominal/Component of Compensation for the Board of Commissioners and Directors

Pada tahun 2021, secara lebih rinci remunerasi masing-masing Dewan Komisaris dan Direksi yang telah terealisasi dapat disampaikan, sebagai berikut:

In 2021, the following details may be provided on the salary of each Board of Commissioners and Board of Directors that has been realised:

Nama Name	Jabatan Position	Gaji Wages	THR THR	Tantiem Tantiem	Tunjangan allowance			
					Perumahan Housing Area	Transportasi Transportation	Purna Jabatan Full Position	Komunikasi Communication
Budi Satria	Komisaris Utama President Commissioner	√				√	√	
Eko B. Supriyanto.	Komisaris Independen Independent Commissioner	√				√	√	
Rina Saadah.	Komisaris Independen Independent Commissioner	√				√	√	
Rama Notowidigdo.	Komisaris Independen Independent Commissioner	√				√	√	
Achmad F.C Barir.	Komisaris Commissioner	√				√	√	

Nama Name	Jabatan Position	Gaji Wages	THR THR	Tantiem Tantiem	Tunjangan allowance			
					Perumahan Housing Area	Transportasi Transportation	Purna Jabatan Full Position	Komunikasi Communication
Kaspar Situmorang	Direktur Utama President Director	√			√		√	√
Arif Wicaksono.	Direktur Keuangan dan Operasional Director of Finance and Operations	√			√		√	√
Ernawan	Direktur Enterprise Risk Management, Compliance & Human Resource Director of Enterprise Risk Management, Compliance & Human Resources	√			√		√	√
Sigit Murtiyoso.	Direktur Retail Agri dan Pendanaan Director of Agri Retail and Funding	√			√		√	√
Bhimo Wikan Hantoro.	Direktur Digital Bisnis Director of Digital Business	√			√		√	√

Jumlah Remunerasi dalam setahun Amount of Remuneration in a year	Jumlah Dewan Komisaris Number of Board of Commissioners	Jumlah Direksi Number of Board of Directors
Diatas Rp2 miliar Above IDR 2 billion	0	4
Diantara Rp1 sampai Rp2 miliar Between IDR 1 to IDR 2 billion	1	1
Diantara Rp500 juta - dibawah Rp1 miliar Between IDR 500 million - under IDR 1 billion	4	0
Dibawah Rp500 juta Under IDR 500 million	0	0

Remunerasi & Fasilitas Remuneration & Facilities	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Jumlah Amount	Rp (juta) IDR (million)	Jumlah Amount	Rp (juta) IDR (million)
Honorarium Honorarium	5	3.069.036.000	5	7.340.796.666
Tantiem Tantiem	1	42.631.336	3	257.361.927
Tunjangan allowance	5	1.470.780.428	5	3.902.291.666
Total Total	11	4.582.447.764	13	11.500.450.229

Rapat Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors Meetings

Rapat Dewan Komisaris

Meeting of the Board of Commissioners

Dewan Komisaris wajib mengadakan rapat paling kurang 1 (satu) kali setiap bulan. Dalam rapat tersebut Dewan Komisaris dapat mengundang Direksi. Rapat Dewan Komisaris juga dapat diadakan sewaktu-waktu atas permintaan 1 (satu) atau beberapa anggota Dewan Komisaris atau atas permintaan Direksi atau atas permintaan tertulis dari 1 (satu) atau beberapa Pemegang Saham yang mewakili sekurang-kurangnya 1/10 (satu per sepuluh) dari jumlah saham dengan hak suara.

Keputusan rapat Dewan Komisaris harus diambil berdasarkan musyawarah untuk mufakat. Jika keputusan berdasarkan musyawarah untuk mufakat tidak tercapai, maka keputusan rapat harus diambil dengan pemungutan suara.

Dalam setiap rapat Dewan Komisaris dibuatkan risalah rapat oleh Sekretaris perusahaan dan ditandatangani oleh pimpinan rapat serta seluruh anggota Dewan Komisaris yang hadir dalam rapat. Risalah rapat berisi hal-hal yang dibicarakan dan hal-hal yang diputuskan.

Frekuensi, Agenda dan Kehadiran Rapat Dewan Komisaris

Sepanjang tahun 2021, Dewan Komisaris Bank Raya melangsungkan rapat internal sebanyak 36 (tiga puluh enam) kali dengan tingkat kehadiran dan agenda sebagai berikut:

Each month, the Board of Commissioners must meet at least once. The Board of Commissioners may invite the Board of Directors to the meeting. Meetings of the Board of Commissioners may also be called at any time upon the written request of 1 (one) or more members of the Board of Commissioners, the Board of Directors, or upon the written request of 1 (one) or more Shareholders representing at least 1/10 (one tenth) of the voting stock.

The Board of Commissioners meeting must make a decision based on discussion and consensus. If a decision cannot be reached through deliberation and consensus, the meeting must be decided by vote.

The Corporate Secretary keeps minutes of each meeting of the Board of Commissioners, which are signed by the meeting's chairman and all members of the Board of Commissioners present. The minutes of the meeting contain information about the topics discussed and decisions made.

Frequency, Agenda and Attendance of Board of Commissioners Meetings

Throughout the year 2021, Bank Raya's Board of Commissioners had 36 (thirty six) internal meetings with the following attendance and agenda:

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
Budi Satria	Komisaris Utama President Commissioner	36	36	100%
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	23	23	100%
Rina Saadah	Komisaris Independen Independent Commissioner	23	23	100%
Rama Notowidigdo	Komisaris Independen Independent Commissioner	23	18	78%
Achmad F.C. Barir	Komisaris Commissioner	23	22	96%

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	01 Februari 2021 February 1, 2021	Pengunduran Diri Anggota Komite Remunerasi dan Nominasi Resignation of Remuneration and Nomination Committee Member	3
2.	22 Februari 2021 February 22, 2021	Usulan Mata Acara RUPS Tahunan Tahun Buku 2020 BRI Agro Proposed Agenda for BRI Agro's 2020 Fiscal Year Annual GMS	3
3.	3 Maret 2021 March 3, 2021	Penerimaan Calon Anggota Komite Remunerasi dan Nominasi Acceptance of Candidates for Remuneration and Nomination Committee	3
4.	8 Maret 2021 March 8, 2021	Pemberian Persetujuan Kredit kepada Pihak Terkait Granting Credit Approval to Related Parties	3
5.	8 Maret 2021 March 8, 2021	Self Assesment dan Reposisi Anggota Komite Pemantau Risiko Self Assessment and Repositioning of Risk Monitoring Committee Members	3
6.	10 Maret 2021 March 10, 2021	Usulan Penambahan Mata Acara RUPS Proposed Addition of GMS Agenda	3
7.	15 Maret 2021 March 15, 2021	Tantiem Tahun Buku 2020 dan remunerasi tahun 2021 Direksi dan Dekom BRI Agro Tantiem for Fiscal Year 2020 and remuneration in 2021 for Directors and Board of Commissioners of BRI Agro	3
8.	17 Maret 2021 March 17, 2021	Self Assesment dan Reposisi Anggota Komite Audit Self Assessment and Repositioning of Audit Committee Members	3
9.	17 Maret 2021 March 17, 2021	Saran dan Masukan Dewan Komisaris kepada Direksi terkait kualitas Kredit dan Hasil EY Suggestions and Feedback from the Board of Commissioners to the Board of Directors regarding Credit Quality and EY Results	3
10.	24 Maret 2021 March 24, 2021	Penunjukan Pimpinan RUPS Tahunan Tahun Buku 2020 Appointment of Chairperson of the 2020 Fiscal Year Annual GMS	3
11.	29 Maret 2021 March 29, 2021	Evaluasi Anggota Komite Committee Member Evaluation	3
12.	31 Maret 2021 March 31, 2021	Usulan Risk Appetite Statement (RAS) 2021 BRI Agro Proposed Risk Appetite Statement (RAS) 2021 BRI Agro	3
13.	5 April 2021 April 5, 2021	Perubahan Pengurus BRI Agro Changes in the Management of BRI Agro	3
14.	26 April 2021 April 26, 2021	Perubahan Susunan Anggota Komite Dewan Komisaris Changes in the Composition of Committee Members of the Board of Commissioners	5
15.	24 Mei 2021 May 24, 2021	Pemberian Persetujuan Kredit kepada Pihak Terkait Granting Credit Approval to Related Parties	5
16.	23 Juni 2021 June 23, 2021	Penunjukkan Anggota Komite Tata Kelola Terintegrasi (KTKT) Konglomerasi Keuangan BRI Appointment of Members of the Integrated Governance Committee (KTKT) of the BRI Financial Conglomerate	4
17.	26 Juli 2021 July 26, 2021	Usulan Mata Acara RUPSLB Proposed EGMS Agenda	5
18.	28 Juli 2021 July 28, 2021	Persetujuan Pelaksanaan Pembagian Sisa Saham MESOP BRI Agro Approval for the Distribution of the Remaining Shares of MESOP BRI Agro	5

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
19.	29 Juli 2021 July 29, 2021	Persetujuan Usulan Penyesuaian RBB Revisi BRI Agro Tahun 2021-2023 Approval of the Proposed Adjustment of BRI Agro's Revised RBB for 2021-2023	5
20.	30 Juli 2021 July 30, 2021	Persetujuan Penetapan Kriteria Penerima Saham MESOP Approval for Determination of Criteria for MESOP Shareholders	5
21.	04 Agustus 2021 August 4, 2021	Persetujuan Usulan Mata Acara RUPSLB PT BRI Agroniaga Tbk Approval of the proposed EGMS agenda of PT BRI Agroniaga Tbk	5
22.	09 Agustus 2021 August 9, 2021	Persetujuan Penyesuaian Isi Mata Acara RUPSLB PT BRI Agroniaga Tbk Approval for Adjusting the Contents of the EGMS Agenda of PT BRI Agroniaga Tbk	5
23.	10 Agustus 2021 August 10, 2021	Laporan Informasi Mata Acara RUPSLB PT BRI Agroniaga Tbk Information Report on the EGMS Agenda of PT BRI Agroniaga Tbk	4
24.	16 Agustus 2021 August 16, 2021	Persetujuan Penawaran Umum Terbatas IX (Right Issue) BRI Agro Approval of BRI Agro's Limited Public Offering IX (Right Issue)	5
25.	29 Agustus 2021 August 29, 2021	Persetujuan Laporan Pengawasan Dekom Semester 1 tahun 2021 Approval of the Supervisory Report of the Board of Commissioners for Semester 1 of 2021	4
26.	09 September 2021 September 9, 2021	Penunjukan Pimpinan RUPSLB Tahun 2021 BRI Agro Appointment of Chairperson of BRI Agro EGMS 2021	5
27.	13 September 2021 September 13, 2021	Usulan SK Pedoman Pelaksanaan Sistem Manajemen Anti Penyuapan (SMAP) Proposed SK Guidelines for the Implementation of Anti-Bribery Management System (SMAP)	5
28.	20 September 2021 September 20, 2021	Pengunduran Diri Anggota Komite Pemantau Risiko Resignation of Risk Monitoring Committee Member	4
29.	21 September 2021 September 21, 2021	Persetujuan Penambahan Modal Ditempatkan dan Disetor Hasil Konversi MESOP Perseroan Approval of Additional Issued and Paid-in Capital from the Company's MESOP Conversion	4
30.	06 Oktober 2021 October 6, 2021	Penerimaan Calon Anggota Komite Pemantau Risiko Acceptance of Candidates for Risk Monitoring Committee Members	5
31.	06 Oktober 2021 October 6, 2021	Pembahasan SK Kebijakan Penerapan Tata Kelola Perusahaan yang Baik (GCG) Discussion of Decree on Good Corporate Governance (GCG) Implementation Policy	5
32.	22 Oktober 2021 October 22, 2021	Pembahasan Usulan Harga Penawaran Umum Terbatas IX (Right Issue) BRI Agro Discussion on the Proposed Price of BRI Agro's Limited Public Offering IX (Right Issue)	5
33.	25 Oktober 2021 October 25, 2021	Persetujuan SK Pedoman Komite Etik Approval of the SK Guidelines for the Ethics Committee	5
34.	30 November 2021 November 30, 2021	Persetujuan RBB dan Corplan RBB and Corplan Approval	5
35.	29 Desember 2021 December 29, 2021	Update Pedoman Kerja Dewan Komisaris, Komite dan Sekretaris Dewan Komisaris Update on the Work Guidelines for the Board of Commissioners, Committees and Secretary to the Board of Commissioners	5
36.	31 Desember 2021 December 31, 2021	Persetujuan PAT Tahun 2022 2022 PAT Approval	4

Frekuensi, Agenda dan Kehadiran Rapat Dewan Komisaris dan Direksi

Sepanjang tahun 2021, Dewan Komisaris Bank Raya melangsungkan rapat bersama Direksi sebanyak 24 (dua puluh empat) kali dengan tingkat kehadiran dan agenda sebagai berikut:

Board of Commissioners and Board of Directors Meetings: Frequency, Agenda, and Attendance

Throughout 2021, the Bank Raya Board of Commissioners met 24 (twenty-four) times with the Board of Directors, with the following attendance and agendas:

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
Budi Satria	Komisaris Utama President Commissioner	24	24	100%
Eko B. Supriyanto	Komisaris Independen Independent Commissioner	17	17	100%
Rina Saadah	Komisaris Independen Independent Commissioner	17	17	100%
Rama Notowidigdo	Komisaris Independen Independent Commissioner	17	13	76%
Achmad F.C. Barir	Komisaris Commissioner	17	17	100%
Kaspar Situmorang	Direktur Utama President Director	17	16	94%
Arif Wicaksono	Direktur Keuangan & Operasional Director of Finance & Operations	24	18	75%
Ernawan	Direktur Enterprise Risk Management, Compliance & Human Resource Director of Enterprise Risk Management, Compliance & Human Resource	24	23	96%
Sigit Murtiyoso	Direktur Retail Agri & Pendanaan Director of Agri Retail & Funding	24	23	96%
Bhimo Wikan Hantoro	Direktur Digital Bisnis Director of Digital Business	17	16	94%

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	20 Januari 2021 January 20, 2021	Pembahasan Kinerja Desember 2020 December 2020 Performance Discussion	9
2.	20 Januari 2021 January 20, 2021	Progress Transformasi dan Tindaklanjuti Target Recovery December 2020 Performance Discussion	8
3.	22 Februari 2021 February 22, 2021	Pembahasan Kinerja Januari 2021 January 2021 Performance Discussion	9

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
4.	22 Februari 2021 February 22, 2021	Progress Transformasi Transformation Progress	9
5.	22 Maret 2021 March 22, 2021	Pembahasan Kinerja Februari 2021 February 2021 Performance Discussion	8
6.	22 Maret 2021 March 22, 2021	Progress Transformasi Transformation Progress	8
7.	24 Maret 2021 March 24, 2021	Penyesuaian RBB 2021-2023 (Transformasi) Adjustment of RBB 2021-2023 (Transformation)	8
8.	21 April 2021 April 21, 2021	Pembahasan Kinerja Maret 2021 March 2021 Performance Discussion	10
9.	26 April 2021 April 26, 2021	Progress Transformasi Digital Digital Transformation Progress	10
10.	3 Mei 2021 May 3, 2021	Progress Revamp dan Kredit Bermasalah Revamp Progress and Non-performing Credit	9
11.	10 Mei 2021 May 10, 2021	Revisi RBB 2021-2023 Revision of RBB 2021-2023	10
12.	24 Mei 2021 May 24, 2021	Pembahasan Kinerja April 2021 April 2021 Performance Discussion	10
13.	2 Juni 2021 June 2, 2021	RBB Revisi 2021-2023 RBB Revised 2021-2023	9
14.	16 Juni 2021 June 16, 2021	Progress Revamp Progress Revamp	9
15.	21 Juni 2021 June 21, 2021	Pembahasan Kinerja Mei 2021 Performance Discussion May 2021	9
16.	28 Juni 2021 June 28, 2021	Progress Transformasi Digital Digital Transformation Progress	8
17.	21 Juli 2021 21 July 2021	Pembahasan Kinerja Juni 2021 Performance Discussion June 2021	10
18.	21 Juli 2021 21 July 2021	Pembahasan Loan Review Loan Review Discussion	10
19.	23 Agustus 2021 August 23, 2021	Pembahasan Kinerja Juli 2021 July 2021 Performance Discussion	9
20.	22 September 2021 September 22, 2021	Pembahasan Kinerja Agustus 2021 Performance Discussion August 2021	10
21.	04 Oktober 2021 October 4, 2021	Usulan RBB Tahun 2022-2024 Proposed RBB for 2022-2024	7
22.	25 Oktober 2021 October 25, 2021	Pembahasan Kinerja September 2021 September 2021 Performance Discussion	9
23.	22 November 2021 November 22, 2021	Pembahasan Kinerja Oktober 2021 October 2021 Performance Discussion	10
24.	22 Desember 2021 December 22, 2021	Pembahasan Kinerja November 2021 November 2021 Performance Discussion	10

Rapat Direksi Meeting of the Board of Directors

Rapat Direksi diadakan minimal 1 (satu) bulan sekali dan apabila dipandang perlu Rapat Direksi dapat diadakan setiap waktu sesuai kebutuhan. Selain itu, juga wajib mengadakan rapat Direksi bersama Dewan Komisaris secara berkala paling kurang 1 (satu) kali dalam 4 (empat) bulan.

Setiap kebijakan dan keputusan strategis wajib diputuskan melalui Rapat Direksi dengan memperhatikan pengawasan sesuai tugas dan tanggung jawab Dewan Komisaris. Keputusan Rapat Direksi harus diambil berdasarkan musyawarah untuk mufakat. Dalam hal tidak terjadi musyawarah untuk mufakat, pengambilan keputusan dilakukan berdasarkan suara terbanyak.

Direksi wajib membuat risalah rapat Direksi dan didokumentasikan sesuai dengan peraturan perundang-undangan. Risalah rapat dibuat oleh Sekretaris Perusahaan atau pihak lain yang ditunjuk oleh ketua rapat.

The Board of Directors meets at least once a month and, if considered essential, at any time. Additionally, it is mandatory for the Board of Directors to meet regularly with the Board of Commissioners at least once every four months.

Each policy and strategic decision must be made by the Board of Directors in accordance with the Board of Commissioners' roles and obligations. Board of Directors Meeting decisions must be made via discussion and consensus. If no agreement is reached, decisions are taken by majority vote.

The Board of Directors is expected to keep meeting minutes and to record them in compliance with applicable rules and regulations. The Corporate Secretary or another party selected by the meeting's chairman prepares the meeting's minutes.

Frekuensi, Agenda dan Kehadiran Rapat Direksi

Sepanjang tahun 2021, Direksi Bank Raya melangsungkan rapat sebanyak 105 (seratus lima) kali dengan tingkat kehadiran dan agenda sebagai berikut:

Board of Directors Meetings: Frequency, Agenda, and Attendance

Throughout the year 2021, Bank Raya's Board of Directors had 105 (one hundred and five) meetings with the following attendance and agenda:

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
Kaspar Situmorang	Direktur Utama President director	83	73	88%
Arif Wicaksono	Direktur Keuangan & Operasional Director of Finance & Operations	105	89	85%
Ernawan	Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i> Director of Enterprise Risk Management, Compliance & Human Resources	105	92	88%
Sigit Murtiyoso	Direktur Retail Agri & Pendanaan Director of Retail Agri & Funding	105	92	88%
Bhimo Wikan Hantoro	Direktur Digital Bisnis Director of Digital Business	83	72	87%

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	5 Januari 2021 January 5, 2021	Progress Rencana Transformasi Transformation Plan Progress	5
2.	5 Januari 2021 January 5, 2021	Progress/Update NPL Progress/ Updates	5
3.	7 Januari 2021 January 7, 2021	Finalisasi Laporan Sementara - Desember 2020 Finalization of Interim Report - December 2020	3
4.	13 Januari 2021 January 13, 2021	Persiapan Rakernas Januari 2021 January 2021 National Work Meeting Preparation	5
5.	14 Januari 2021 January 14, 2021	Progress Penanganan NPL NPL Handling Progress	5
6.	19 Januari 2021 January 19, 2021	- Update Debitur Bisnis Menengah - Progress Penanganan NPL - Medium Business Debtor Update - NPL Handling Progress	5
7.	19 Januari 2021 January 19, 2021	Usulan Pengadaan Konsultan & Tindak Lanjut Covid 19 Proposal for Procurement of Consultants & Follow-up for Covid 19	5
8.	19 Januari 2021 January 19, 2021	Progress Rencana Transformasi Transformation Plan Progress	5
9.	2 Februari 2021 February 2, 2021	- Update PMO Awal Februari - Progress Penanganan NPL - Update PMO Early February - NPL Handling Progress	3
10.	9 Februari 2021 February 9, 2021	- Update Penanganan NPL Menengah - Update Penanganan NPL Ritel - Update Tim Transformasi - Intermediate NPL Handling Update - Retail NPL Handling Update - Transformation Team Update	5
11.	10 Februari 2021 February 10, 2021	Pemenuhan Formasi Struktur Organisasi Baru Fulfillment of the New Organizational Structure Formation	5
12.	16 Februari 2021 February 16, 2021	- Update PMO Week 2 Februari - Update Program DJS 2021 - Progress Penanganan NPL - Update PMO Week 2 February - DJS 2021 Program Update - NPL Handling Progress	5
13.	23 Februari 2021 February 23, 2021	- Update PMO Week 3 Februari - Progress Penanganan NPL - Update Mapping Revamp - Update PMO Week 3 February - NPL Handling Progress - Update Mapping Revamp	5
14.	2 Maret 2021 March 2, 2021	- Update Tim Transformasi - Progress Penanganan NPL - Transformation Team Update - NPL Handling Progress	5
15.	5 Maret 2021 March 5, 2021	Penetapan Kinerja Pegawai Determination of Employee Performance	5

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
16.	9 Maret 2021 March 9, 2021	- Update Tim Transformasi - Usulan Penambahan Mata Acara RUPS Tahunan 2021 - Transformation Team Update - Proposed Additional Agenda for the 2021 Annual GMS	4
17.	16 Maret 2021 March 16, 2021	Update PMO W2 Maret Update PMO W2 March	4
18.	16 Maret 2021 March 16, 2021	- Update Pendanaan - Update NPL - RBB Thn 21-23 (Revisi) - Funding Update - NPL updates - RBB Year 21-23 (Revised)	4
19.	23 Maret 2021 March 23, 2021	- Update NPL - Finalisasi RBB Tahun 21 -23 (Revisi) - NPL updates - Finalization of RBB Years 21-23 (Revised)	4
20.	23 Maret 2021 March 23, 2021	Update PMO W3 Maret March W3 PMO Update	4
21.	30 Maret 2021 March 30, 2021	Update PMO W4 Maret Update PMO W4 March	5
22.	6 April 2021 April 6, 2021	Update Transformasi W5 Maret March W5 Transformation Update	3
23.	13 April 2021 April 13, 2021	Update Tim Transformasi W1 April 2021 W1 Transformation Team Update April 2021	5
24.	13 April 2021 April 13, 2021	Pemenuhan Formasi Struktur Organisasi Baru Fulfillment of the New Organizational Structure Formation	4
25.	15 April 2021 April 15, 2021	Penetapan Struktur Organisasi Baru Establishing a New Organizational Structure	5
26.	21 April 2021 April 21, 2021	Penetapan Direktur Pembina KC Appointment of KC Guiding Director	5
27.	21 April 2021 April 21, 2021	Update Tim Transformasi W2 April 2021 W2 Transformation Team Update April 2021	5
28.	28 April 2021 April 28, 2021	Struktur Organisasi Baru New Organizational Structure	5
29.	4 Mei 2021 May 4, 2021	Update Tim Transformasi W4 April 2021 Update April 2021	5
30.	10 Mei 2021 May 10, 2021	Revisi RBB 2021-2023 Revision of RBB 2021-2023	5
31.	24 Mei 2021 May 24, 2021	Survei dan Penataan KC KC Survey and Arrangement	5
32.	25 Mei 2021 May 25, 2021	- Update Tim Transformasi W3 Mei 2021 - Usulan Penyesuaian SI - Usulan Produk P2P Channeling - W3 Transformation Team Update May 2021 - SI Adjustment Proposal - P2P Channeling Product Proposal	5
33.	2 Juni 2021 June 2, 2021	Revisi RBB 2021-2023 Revision of RBB 2021-2023	5

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
34.	8 Juni 2021 June 8, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up for TKB Ratio Improvement	5
35.	8 Juni 2021 June 8, 2021	- Progress Transformasi W1 Juni 2021 - Progress Tindak Lanjut TKB - CB New Business Model - W1 Transformation Progress June 2021 - TKB Follow-up Progress - CB New Business Model	5
36.	9 Juni 2021 June 9, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	5
37.	10 Juni 2021 June 10, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	4
38.	11 Juni 2021 June 11, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	5
39.	12 Juni 2021 June 12, 2021	Finalisasi Revisi RBB 2021-2023 Finalization of RBB Revision 2021-2023	5
40.	14 Juni 2021 June 14, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	3
41.	15 Juni 2021 June 15, 2021	- Progress Transformasi W2 Juni 2021 - Update Progress TKB - W2 Transformation Progress June 2021 - TKB Progress Update	5
42.	15 Juni 2021 June 15, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	5
43.	Juni 2021 June 17, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	3
44.	21 Juni 2021 June 21, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	3
45.	22 Juni 2021 June 22, 2021	Digital Saving Progress Digital Saving Progress	5
46.	22 Juni 2021 June 22, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	5
47.	23 Juni 2021 June 23, 2021	- Progress Transformasi W3 Juni 2021 - Update Progress TKB - W3 Transformation Progress June 2021 - TKB Progress Update	5
48.	23 Juni 2021 June 23, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	5
49.	24 Juni 2021 June 24, 2021	Pembahasan <i>Employee Engagement</i> Employee Engagement Discussion	4
50.	24 Juni 2021 June 24, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	3
51.	25 Juni 2021 June 25, 2021	Penetapan WFH Direksi Appointment of WFH Board of Directors	4
52.	25 Juni 2021 June 25, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	3
53.	28 Juni 2021 June 28, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	4

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
54.	29 Juni 2021 June 29, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	3
55.	30 Juni 2021 June 30, 2021	Tindak Lanjut Perbaikan Rasio TKB Follow-up to TKB Ratio Improvement	5
56.	30 Juni 2021 June 30, 2021	Restrukturisasi Kredit Credit Restructuring	5
57.	2 Juli 2021 July 2, 2021	Pembahasan Surat BRI Terkait RBB 2021-2023 dan KPI 2021 Discussion of BRI Letters Related to RBB 2021-2023 and KPI 2021	4
58.	5 Juli 2021 July 5, 2021	Progress Pemenuhan Surat BRI Terkait RBB 2021-2023 dan KPI 2021 Progress of Fulfillment of BRI Letters Regarding RBB 2021-2023 and KPI 2021	4
59.	6 Juli 2021 July 6, 2021	- Progress Transformasi W5 Juni 2021 - Update Migrasi ke Menara BRILian - Proses OnBoarding Pegawai Baru - W5 Transformation Progress June 2021 - Migration Update to BRILian Tower - New Employee Onboarding Process	4
60.	7 Juli 2021 July 7, 2021	Pembahasan Materi Audiensi Kepada OJK terkait Revamp dan Rencana Direktorat Bisnis Digital Discussion of Audience Materials to OJK regarding Revamp and Digital Business Directorate Plan	3
61.	12 Juli 2021 July 12, 2021	Tindak Lanjut Hasil Loan Review BRI Agro Follow-up to BRI Agro's Loan Review Results	5
62.	14 Juli 2021 July 14, 2021	- Progress Transformasi W1 Juli 2021 - Persiapan Materi Steerco - Progress July 2021 - Steerco Material Preparation	5
63.	14 Juli 2021 July 14, 2021	Human Capital Human Capital	5
64.	21 Juli 2021 July 21, 2021	Tindak Lanjut Hasil Loan Review BRI Agro Follow-up to BRI Agro's Loan Review Results	5
65.	23 & 25 Juli 2021 July 23 & 25, 2021	Tindak Lanjut Hasil Loan Review BRI Agro Follow-up to BRI Agro's Loan Review Results	5
66.	27 Juli 2021 July 27, 2021	- Progress Transformasi W3 Juli 2021 - RMO Update - Progress July 2021 - RMO Update	4
67.	28 Juli 2021 July 28, 2021	Tindak Lanjut Hasil Loan Review BRI Agro Follow-up to BRI Agro's Loan Review Results	5
68.	29 Juli 2021 July 29, 2021	Human Capital Update Human Capital Update	5
69.	2 Agustus 2021 August 2, 2021	Materi Komunikasi dan Persiapan Rebranding Communication Materials and Rebranding Preparation	4
70.	3 Agustus 2021 August 3, 2021	- Progress Transformasi W4 Juli 2021 - RMO Update - W4 Transformation Progress July 2021 - RMO Update	4
71.	5 Agustus 2021 August 5, 2021	Pengembangan SO Team Based Organization SO Team Based Organization Development	5

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
72.	9 Agustus 2021 August 9, 2021	- Progress Transformasi W1 Agustus 2021 - RMO Update	4
73.	12 Agustus 2021 12 August 2021	CEO Message Transformasi CEO Message Transformation	5
74.	16 Agustus 2021 August 16, 2021	Surat BI Perihal: Tindak Lanjut Pemrosesan Permohonan Izin Penyelenggara Jasa Sistem Pembayaran BI Letter Regarding: Follow-up Processing of Applications for Payment System Service Operator Permits	4
75.	18 Agustus 2021 August 18, 2021	- Progress Transformasi W2 Agustus 2021 - RMO Update	5
76.	25 Agustus 2021 August 25, 2021	- Pemenuhan Formasi - Usulan Kerjasama PKSS - Kompensasi & Benefit Pekerja	4
77.	26 Agustus 2021 August 26, 2021	Update Progress Pemenuhan Dokumen Audit dalam Rangka PUT IX Update on Audit Document Fulfillment Progress in the Context of PUT IX	4
78.	31 Agustus 2021 August 31, 2021	Update Progress Pemenuhan Dokumen Audit dalam Rangka PUT IX Update on Audit Document Fulfillment Progress in the Context of PUT IX	3
79.	31 Agustus 2021 August 31, 2021	Talent Committee & Penetapan Pekerja Talent Committee & Employee Appointment	5
80.	31 Agustus 2021 August 31, 2021	Penyesuaian Divisi Ritel Agri (Crawl Up) Agri Retail Division Adjustment (Crawl Up)	3
81.	1 September 2021 September 1, 2021	Kolektibilitas Debitur Terkait Hasil Pemeriksaan EY Collectability of Related Debtors Related to EY Pemeriksaan Examination Results	4
82.	1 September 2021 September 1, 2021	Update Progress Pemenuhan Dokumen Audit dalam Rangka PUT IX Update on Audit Document Fulfillment Progress in the Context of PUT IX	3
83.	2 September 2021 September 2, 2021	Strategi Divisi Dana & Jasa Funds & Services Division Strategy	3
84.	3 September 2021 September 3, 2021	RKA Direktorat Digital Bisnis RKA Directorate of Digital Business	4
85.	8 September 2021 September 8, 2021	- Progress Transformasi W1 September 2021 - RMO Update - KPI Direksi - BMPK	3
		- W1 Transformation Progress September 2021 - RMO Updates - KPI Directors - LLL	

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
86.	10 & 11 September 2021	- FGD Proyeksi Bank Digital - Diskusi <i>Design Thinking</i>	5
	September 10 & 11, 2021	- Digital Bank Projection FGD - Design Thinking Discussion	
87.	14 September 2021	- <i>Progress</i> Transformasi W2 September 2021 - <i>RMO Update</i> - KPI Direksi & Korporasi	3
	September 14, 2021	- W2 Transformation Progress September 2021 - RMO Updates - Directors & Corporate KPIs	
88.	21 September 2021	- <i>Progress</i> Transformasi W3 September 2021 - <i>RMO Update</i> - KPI Direksi & Korporasi - Super Apps - Aspek Legal Terkait Nama dan Logo	5
	September 21, 2021	- W3 Transformation Progress September 2021 - RMO Updates - Directors & Corporate KPIs - Super Apps - Legal Aspects Regarding Name and Logo	
89.	27 September 2021	Penyelesaian Kewajiban Debitur	5
	September 27, 2021	Settlement of Debtor's Obligations	
90.	29 September 2021	- <i>Progress</i> Transformasi W4 September 2021 - <i>RMO Update</i> - KPI Direksi & Korporasi - Hasil Pemantauan Tindak Lanjut OJK 2018 & 2020	5
	September 29, 2021	- W4 Transformation Progress September 2021 - RMO Updates - Directors & Corporate KPIs - OJK 2018 & 2020 Follow-up Monitoring Results	
91.	30 September 2021	- Prognosa Desember 2021 - Prognosa Profil Risiko & <i>Underwriting</i> Kredit	4
	September 30, 2021	- Prognosis December 2021 - Prognosis Risk Profile & Credit Underwriting	
92.	1 & 4 Oktober 2021	RBB 2022-2024	5
	October 1 & 4, 2021	RBB 2022-2024	
93.	13 Oktober 2021	- <i>Progress</i> Transformasi W1 Oktober 2021 - <i>Revamp Update</i> Portfolio Management	4
	October 13, 2021	- W1 Transformation Progress October 2021 - Revamp Update Portfolio Management	
94.	26 Oktober 2021	- <i>Progress</i> Transformasi W3 Oktober 2021 - <i>RMO Update</i>	4
	October 26, 2021	- W3 Transformation Progress October 2021 - RMO Updates	

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
95.	1 November 2021	- Digital Saving - Pinang Transaksional - Pinang Konsumer Infinite	5
	November 1, 2021	- Digital Saving - Transactional Areca - Areca Consumer Infinite	
96.	4 November 2021 November 4, 2021	Progress Transformasi W4 Oktober 2021 Progress October 2021	3
97.	8 November 2021 November 8, 2021	Mutasi dan Promosi BoD-1 dan BoD-2 BoD-1 and BoD-2 Mutations and Promotions	4
98.	9 November 2021 November 9, 2021	Progress Transformasi W1 November 2021 Progress November 2021	4
99.	17 November 2021 November 17, 2021	Penyesuaian Produk Eksisting dengan Produk Digital Customization of Existing Products with Digital Products	3
100.	23 November 2021 November 23, 2021	Omnichannel Call Center Omnichannel Call Center	4
101.	29 November 2021	- RBB Final 2022-2024 - Progress Transformasi W4 November 2021 - Radisi RAC	4
	November 29, 2021	- RBB Final 2022-2024 - W4 Transformation Progress November 2021 - RAC Radiation	
102.	6 Desember 2021	- Penyelesaian BMPK - Radisi CB - Progress Transformasi W1 Desember 2021 - Persiapan Grand Launching & Kalender 2021 - Prognosa Laba & TKB Desember 2021	5
	December 6, 2021	- Completion of LLL - CB Radiation - W1 Transformation Progress December 2021 - Preparation for Grand Launching & 2021 Calendar - Profit & TKB Prognosis December 2021	
103.	9 Desember 2021 December 9, 2021	Materi Pra Rakernas Pre Rakernas Material	5
104.	20 Desember 2021	- Follow Up Digital Saving - Tindak Lanjut Hasil Pra-Rakernas - Progress Transformasi W3 Desember 2021 - Penguatan Kapabilitas Contact Center - Biaya Revamp Portfolio ke BRI	5
	December 20, 2021	- Follow Up Digital Saving - Follow-up on Pre-Rakernas Results - W3 Transformation Progress December 2021 - Strengthening Contact Center Capabilities - Portfolio Revamp Fee to BRI	
105.	27 Desember 2021	- Product Marketing Strategy 2022 - Prognosa KPI Desember 2021 & Rakerwil BRI	5
	December 27, 2021	- Product Marketing Strategy 2022 - December 2021 KPI Prognosis & BRI Regional Work Meeting	

Komite Audit Audit Committee

Komite Audit merupakan komite di bawah Dewan Komisaris yang memiliki tugas dan tanggung jawab untuk melakukan pengawasan atas efektivitas sistem pengendalian internal, manajemen risiko, internal audit, proses pelaporan keuangan.

In the Board of Commissioners, there is a subcommittee called the Audit Committee. It is in charge of making sure that the internal control system is working properly, as well as risk management, internal auditing, and financial reporting.

Dasar Hukum Legal Foundation

1. Peraturan OJK Nomor 55/POJK.03/2016 tanggal 9 Desember 2016 tentang penerapan tata Kelola Bagi Bank Umum.
 2. Surat Edaran OJK Nomor 13/SE0JK.03/2017 tanggal 17 Maret 2017 tentang penerapan tata Kelola bagi Bank Umum.
 3. Peraturan OJK Nomor 55/POJK.04/2015 tanggal 23 Desember 2015 tentang pembentukan dan pedoman pelaksanaan Kerja Komite audit.
 4. Anggaran Dasar Bank Raya terakhir yang dituangkan dalam Akta No.18 tanggal 27 April 2021, dibuat dihadapan Mochamad Nova Faisal, S.H., M.K.n., Notaris di Jakarta. dan telah mendapatkan persetujuan dari Menteri Hukum dan Hak asasi Manusia Republik Indonesia No.AHU-AH.01.03.0271778 Tahun 2021 tanggal 28 April 2021.
1. On December 9, 2016, the OJK issued Regulation No. 55/POJK.03/2016 on Good Corporate Governance in Commercial Banks.
 2. FSA Circular Letter No. 13/SE0JK.03/2017, issued on March 17, 2017, on the implementation of good corporate governance principles by commercial banks.
 3. FSA Regulation No. 55/POJK.04/2015, dated December 23, 2015, establishing and enforcing Audit Committee guidelines.
 4. the most recent Bank Raya Articles of Association, as specified in Deed No.18 dated April 27, 2021, and prepared in Jakarta in the presence of Mochamad Nova Faisal, S.H., M.K.n., Notary, was approved by the Minister of Law and Human Rights of the Republic of Indonesia on April 28, 2021, with the number AHU-AH.01.03.0271778 of 2021.

Piagam Komite Audit The Charter of the Audit Committee

Komite Audit perusahaan memiliki piagam Komite Audit sebagai pedoman dalam menjalankan peran, tugas dan tanggung jawabnya membantu Dewan Komisaris. Piagam Komite audit mencakup dasar hukum, wewenang, tugas, tanggung jawab, struktur organisasi komite hingga tata cara pelaksanaan rapat.

The Audit Committee of the Company is guided by an Audit Committee charter in carrying out its roles, obligations, and responsibilities in assisting the Board of Commissioners. The audit committee charter details the committee's legal foundation, authority, duties, and responsibilities, organisational structure, and meeting protocols.

Piagam Komite Audit disahkan dalam risalah rapat Dewan Komisaris No. 81/SDK-XII/2021 tanggal 29 Desember 2021 tentang update Pedoman Kerja Dewan Komisaris, Komite dan Sekretaris Dewan Komisaris dan yang terakhir adalah Surat Keputusan Dewan Komisaris No Kpts B.01/KOM/SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman dan Tata Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Piagam Komite Audit ditinjau kembali secara berkala untuk menyesuaikan dengan ketentuan yang berlaku.

The Audit Committee Charter was ratified in the minutes of the Board of Commissioners meeting No. 81/SDK-XII/2021 dated December 29, 2021 regarding the update of the Work Guidelines for the Board of Commissioners, Committees, and Secretary to the Board of Commissioners, and in the Board of Commissioners Decree No. B.01/KOM/SKP/12/2021 dated December 29, 2021 regarding the Board of Commissioners' Guidelines and Work Procedures, Audit Committee, The Audit Committee Charter is checked out on a regular basis to make sure it meets the needs of the time.

Kriteria Anggota Komite Audit

Criteria for Appointing Members to the Audit Committee

Secara umum, persyaratan keanggotaan Komite audit Perseroan, sebagai berikut:

1. Wajib memiliki integritas yang tinggi, akhlak dan moral yang baik, kemampuan, pengetahuan, pengalaman sesuai dengan bidang pekerjaannya, serta mampu berkomunikasi dengan baik;
2. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Perseroan dalam waktu 6 (enam) bulan terakhir kecuali Komisaris Independen;
3. Bukan merupakan orang dalam kantor akuntan publik, kantor konsultan hukum, kantor jasa penilai publik atau pihak lain yang memberi jasa asuransi, jasa non-asuransi, jasa penilai dan/atau jasa konsultasi lain kepada Perseroan dalam waktu 6 (enam) bulan terakhir;
4. Wajib memahami laporan keuangan, bisnis perusahaan khususnya yang terkait dengan layanan jasa atau kegiatan usaha Perseroan, proses audit, manajemen risiko, dan peraturan perundang-undangan di bidang pasar modal serta peraturan perundang-undangan terkait lainnya;
5. Wajib mematuhi kode etik Komite audit yang ditetapkan oleh Perseroan;
6. Bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan;
7. Wajib memiliki paling kurang satu anggota yang berlatar belakang pendidikan dan keahlian di bidang akuntansi dan/ atau keuangan;
8. Tidak mempunyai saham langsung maupun tidak langsung pada Perseroan;
9. Dalam hal anggota Komite audit memperoleh saham Perseroan baik langsung maupun tidak langsung akibat suatu peristiwa hukum, maka saham tersebut wajib dialihkan kepada pihak lain dalam jangka waktu paling lama 6 (enam) bulan setelah diperolehnya saham tersebut;
10. Tidak mempunyai hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, atau Pemegang Saham utama Perseroan;
11. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Perseroan

In general, the following criteria apply to participation on the company's audit committee:

1. S/he must have a high level of integrity, a good character and morals, the necessary skills, knowledge, and experience, and the ability to communicate effectively;
2. Except for the Independent Commissioner, no one who works for or has the power and obligation to plan, manage, direct, or oversee the company's operations during the previous six (six) months;
3. S/he is not employed by a public accounting firm, legal consulting firm, public appraisal service firm, or any other entity that has provided the company with insurance, non-insurance, appraisal, or other consulting services in the previous six (6) months;
4. S/he must comprehend the financial statements, the operations of the firm, particularly those relating to its services or business activities, the audit process, risk management, and the capital market sector's rules and regulations, as well as any other applicable laws and regulations;
5. S/he must adhere to the company's audit committee's code of ethics;
6. S/he consistently improves competency through education and training
7. At least one member must have a background in accounting or finance.
8. S/he does not own stock in the company, either directly or indirectly;
9. If a member of the audit committee acquires the company's shares directly or indirectly as a consequence of a legal event, the shares must be transferred to another party within six (6) months after purchase.
10. S/he is not related to any member of the Board of Commissioners, any member of the Board of Directors, or any of the company's major shareholders;
11. S/he does not have a commercial connection with the company, either directly or indirectly.

Ketentuan Masa Jabatan

Terms of Office

Dalam Peraturan OJK Nomor 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit dijelaskan mengenai masa tugas anggota Komite Audit tidak boleh lebih lama dari masa jabatan Dewan Komisaris dan hanya dapat dipilih kembali untuk 1 (satu) periode berikutnya.

People who are on the Audit Committee cannot stay on for more than the length of time the Board of Commissioners is in office, according to FSA Regulation No. 55/POJK.04/2015. They can only be re-elected for one term.

Susunan, Jumlah, Komposisi dan Dasar Pengangkatan Komite Audit The Audit Committee's Structure, Total, Composition, and Method of Appointment

Komposisi keanggotaan Komite Audit berdasarkan risalah rapat Dewan Komisaris No. 81/SDK-XII/2021 tanggal 29 Desember 2021 tentang *update* Pedoman Kerja Dewan Komisaris, Komite dan Sekretaris Dewan Komisaris yaitu:

- 1 (satu) orang Komisaris Independen sebagai Ketua Komite Audit merangkap sebagai anggota
- 1 (satu) orang dari pihak Independen yang memiliki keahlian di bidang keuangan atau akuntansi dengan pengalaman kerja paling sedikit 5 (lima) tahun.
- 1 (satu) orang dari pihak independen yang memiliki di bidang Hukum atau perbankan dengan pengalaman kerja minimal 5 (lima) tahun

Board of Commissioners meeting No. 81/SDK-XII/2021, which took place on December 29, 2021, was about updating the Board of Commissioners' work guidelines for the Board of Commissioners, its committees, and the Secretary to the Board of Commissioners.

- 1 (one) Independent Commissioner serving as Chairman and Audit Committee member at the same time
- 1 (one) person from a third party with skills in finance or accounting and at least 5 (five) years of work experience.
- 1 (one) person from an outside source who has worked in law or banking for at least 5 (five) years.

Hingga akhir tahun 2021, susunan keanggotaan Komite Audit adalah sebagai berikut:

Until the end of 2021, the Audit Committee's membership will be as follows:

Nama Name	Jabatan Position	Posisi Position	Dasar Hukum Pengangkatan Legal Basis of Appointment	Keahlian Skill	Masa Jabatan Terms of Service
Rina Saadah	Ketua	Komisaris Independen	Surat Keputusan Direksi No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Pertanian, Perikanan dan Kebijakan Publik	19 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Chairman	Independent Commissioner	Decree of the Board of Directors No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Agriculture, Fisheries and Public Policy	July 19, 2021 until the closing of the 2024 Annual GMS
Eko B. Supriyanto	Anggota	Komisaris Independen	Surat Keputusan Direksi No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Perbankan/ Keuangan, Jurnalistik	23 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Member	Commissioner	Decree of the Board of Directors No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Banking/Finance, Journalism	July 23, 2021 until the closing of the 2024 Annual GMS
Antonius Suryanta	Anggota	Pihak Independen	Surat Keputusan Direksi No Kpts R.30/DIR.01.02/SDM/08/2019 tanggal 13 Agustus 2019	Perbankan/ Keuangan, Audit dan Kepatuhan	1 April 2019 s.d 31 Maret 2023
	Member	Independent Party	Board of Directors Decree No. Kpts R.30/DIR.01.02/SDM/08/2019 dated August 13, 2019	Banking/ Finance, Audit and Compliance	April 1, 2019 to March 31, 2023
Ari Setyo Wibowo	Anggota	Pihak Independen	Surat Keputusan Direksi No. Kpts R.100/Dir.01.02/HCP/PHC/03/2021 tanggal 24 Maret 2021	Perbankan/ Keuangan, Audit, dan Manajemen Risiko	1 April 2021 s.d 31 Maret 2023
	Member	Independent Party	Decree of the Board of Directors No. Kpts R.100/Dir.01.02/HCP/PHC/03/2021 dated March 24, 2021	Banking/ Finance, Audit and Risk Management	April 1, 2021 to March 31, 2023

Profil Komite Audit

Profile of Audit Committee

Nama Name	Rina Saadah
Jabatan Position	Ketua Komite Audit Chairman of the Audit Committee
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
Her profile can be seen in the Profile of the Board of Commissioners in the Company Profile section

Nama Name	Eko B. Supriyanto
Jabatan Position	Anggota Komite Audit Audit Committee Member
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts R.171/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section



Antonius Suryanta
Anggota Komite Audit
Audit Committee Member

Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No Kpts R.30/DIR.01.02/SDM/08/2019 tanggal 13 Agustus 2019 Board of Directors Decree No. Kpts R.30/DIR.01.02/SDM/08/2019 dated August 13, 2019
Usia Age	59 tahun/years of age
Riwayat Pendidikan Educational background	- Sarjana Ekonomi Akuntansi Universitas Gadjah Mada (1987) - Magister Manajemen Universitas Padjadjaran (2000) - Bachelor of Economics in Accounting from Gadjah Mada University (1987) - Master of Management Padjadjaran University (2000)
Riwayat Pekerjaan Employment history	- Wakil Kepala Audit Intern Wilayah BRI Denpasar (2018-2019) - Wakil Pemimpin Wilayah BRI Makassar (2017-2018) - Wakil Pemimpin Wilayah BRI Manado (2014-2017) - Deputy Head of Internal Audit for BRI Denpasar Region (2018-2019) - Deputy Regional Leader of BRI Makassar (2017-2018) - Deputy Regional Leader of BRI Manado (2014-2017)
Keahlian Skill	Perbankan/ Keuangan, Audit dan Kepatuhan Banking/ Finance, Audit and Compliance



Ari Setyo Wibowo
Anggota Komite Audit
Audit Committee Member

Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts R.100/Dir.01.02/HCP/PHC/03/2021 tanggal 24 Maret 2021 Decree of the Board of Directors No. Kpts R.100/Dir.01.02/HCP/PHC/03/2021 dated March 24, 2021
Usia Age	59 tahun/years of age
Riwayat Pendidikan Educational background	- Sarjana Ekonomi Manajemen, Universitas Diponegoro (1987) - Master of Business & Finance, Monash University (1994)
Riwayat Pekerjaan Employment history	- Kepala Audit Wilayah BRI Jakarta 3 (2017-2018) - Kepala Divisi Operasional SDM Kantor Pusat BRI (2015-2017) - Wakil Pemimpin Wilayah Bidang Operasional Kantor Wilayah BRI Jakarta 1 (2013-2015)
Keahlian Skill	Perbankan/Keuangan, Audit, dan Manajemen Risiko Banking/Finance, Audit and Risk Management

Tugas dan Tanggung Jawab Occupational Duties and Obligations

Komite audit mempunyai tugas dan tanggung jawab paling kurang:

1. Melakukan penelaahan atas informasi keuangan yang akan dikeluarkan Perseroan dan/atau pihak otoritas antara lain laporan keuangan, proyeksi, dan laporan lainnya terkait dengan informasi keuangan Perseroan;
2. Melakukan penelaahan atas ketaatan terhadap peraturan perundang-undangan yang berhubungan dengan kegiatan Perseroan;
3. Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen dan akuntan atas jasa yang diberikannya;
4. Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan akuntan yang didasarkan pada independensi, ruang lingkup penugasan, dan imbalan jasa;
5. Melakukan penelaahan atas pelaksanaan pemeriksaan oleh auditor Internal dan mengawasi pelaksanaan tindak lanjut oleh Direksi atas temuan auditor Internal;

At a minimum, the audit committee has the following roles and responsibilities:

1. Examining financial information that will be released by the Company and/or authorities, such as financial reports, predictions, and other reports relating to the Company's financial information;
2. Ensuring compliance with applicable laws and regulations governing the Company's operations;
3. Offering an unbiased view in the case of a disagreement between management and the accountant over the services rendered;
4. Making recommendations to the Board of Commissioners about the employment of an accountant based on the accountant's independence, assignment scope, and compensation for services;
5. Supervising the Internal auditors' execution of the audit and the Board of Directors' follow-up actions on the Internal auditors' conclusions;

6. Menelaah pengaduan yang berkaitan dengan proses akuntansi dan pelaporan keuangan Perseroan;
 7. Menelaah dan memberikan saran kepada Dewan Komisaris terkait dengan adanya potensi benturan kepentingan Perseroan;
 8. Menjaga kerahasiaan dokumen, data dan informasi Perseroan.
 9. Komite audit wajib melakukan pemantauan dan evaluasi atas perencanaan dan pelaksanaan audit serta pemantauan atas tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian intern, termasuk kecukupan proses pelaporan keuangan.
 10. Dalam rangka melaksanakan tugasnya di atas, Komite audit wajib melakukan pemantauan dan evaluasi paling sedikit terhadap :
 - Pelaksanaan tugas satuan kerja audit Intern;
 - Kesesuaian pelaksanaan audit oleh Kantor akuntan publik dengan Standar audit;
 - Kesesuaian laporan keuangan dengan Standar akuntansi Keuangan;
 - Pelaksanaan tindak lanjut oleh Direksi atas hasil temuan Satuan Kerja audit Intern, akuntan publik, dan hasil pengawasan Otoritas Jasa Keuangan, guna memberikan rekomendasi kepada Dewan Komisaris
 11. Komite audit wajib memberikan rekomendasi mengenai penunjukan akuntan publik dan Kantor akuntan publik kepada Dewan Komisaris untuk disampaikan kepada RUPS tahunan.
6. Conducting investigations into complaints about the Company's accounting and financial reporting methods;
 7. Examining and advising the Board of Commissioners on any conflicts of interest within the Company;
 8. Protecting the Company's papers, data, and information.
 9. The audit committee is responsible for monitoring and evaluating the audit's planning and execution, as well as its follow-up, in order to determine the sufficiency of internal control, including the financial reporting process.
 10. In order to carry out the audit committee's responsibilities outlined above, the audit committee is needed to monitor and analyse at the very least:
 - Execution of the Internal audit work unit's responsibilities;
 - Adherence to auditing standards by a public accounting firm;
 - Financial statements that adhere to financial accounting rules;
 - Implementation of the Board of Directors' recommendations based on the findings of the Internal Audit Work Unit, public accountants, and the Financial Services Authority's supervision, in order to submit recommendations to the Board of Commissioners.
 11. The audit committee is obliged to provide recommendations to the Board of Commissioners for the employment of a public accountant and a public accounting firm to be presented to the annual GMS.

Independensi Komite audit

The Audit Committee's Independence

Setiap anggota Komite audit diwajibkan memberikan pernyataan independensi, yang diperbarui setiap tahun. pernyataan independensi Komite Audit disusun sesuai POJK No.55/POJK.04/2015 tentang pembentukan dan pedoman pelaksanaan Kerja Komite audit pasal 7, terkait persyaratan Keanggotaan dan Masa tugas Komite Audit.

Each member of the audit committee is expected to provide an annual statement of independence. The Audit Committee's declaration of independence was written in accordance with POJK No.55/POJK.04/2015 on the establishment and execution of the Audit Committee's rules, namely Article 7, which addresses the Audit Committee's membership criteria and term of service.

Aspek Independensi Independence Aspect	Rina Saadah	Eko B. Supriyanto	Antonius Suryanta	Ari Setyo Wibowo
Tidak memiliki hubungan afiliasi dengan Pemegang Saham, Dewan Komisaris, serta Direksi. S/he has no affiliation with the Shareholders, the Board of Commissioners, and the Board of Directors.	√	√	√	√
Tidak memiliki hubungan usaha secara langsung dan tidak langsung dengan perusahaan S/he does not have a direct or indirect business relationship with the company	√	√	√	√
Tidak memiliki hubungan kepengurusan dengan perusahaan. S/he has no management relationship with the company.	√	√	√	√
Tidak memiliki saham langsung maupun tidak langsung di perusahaan. S/he does not own direct or indirect shares in the company.	√	√	√	√

Rapat Komite Audit Meeting of the Audit Committee

Rapat Komite audit diadakan minimal satu kali dalam 3 bulan. Apabila diperlukan, rapat Komite audit dapat dihadiri oleh anggota Dewan Komisaris, anggota Direksi atau auditor eksternal perusahaan.

Tata cara rapat Komite audit telah diatur di dalam pedoman Kerja Komite audit, yaitu dipimpin oleh Ketua Komite audit dan dihadiri oleh minimal 51% keanggotaan. Rapat diselenggarakan sekurang-kurangnya sekali dalam tiga bulan dengan pengambilan keputusan secara musyawarah untuk mufakat atau berdasarkan pemungutan suara terbanyak.

Sepanjang tahun 2021, Komite Audit Bank Raya melangsung rapat sebanyak 8 Kali dengan frekuensi dan agenda sebagai berikut:

At least once every three months, the Audit Committee meets. If required, members of the Board of Commissioners, members of the Board of Directors, or the company's external auditors may attend the audit Committee meeting.

The audit committee meeting procedures are governed by the audit committee work standards, which are headed by the audit committee chairman and attended by a minimum of 51% of the membership. At least once every three months, meetings are conducted, and decisions are decided via debate for consensus or by majority vote.

The Audit Committee of Bank Raya met eight times in 2021, with the following frequency and agenda:

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
A.Y. Soepadmo	Ketua Komite Audit Chairman of the Audit Committee	1	1	100%
Retno Surdini	Anggota Komite Audit Audit Committee Member	1	1	100%
Rina Saadah	Ketua Komite Audit Chairman of the Audit Committee	7	7	100%
Eko B. Supriyanto	Anggota Komite Audit Audit Committee Member	7	7	100%
Antonius Suryanta	Anggota Komite Audit Audit Committee Member	8	8	100%
Ari Setyo Wibowo	Anggota Komite Audit Audit Committee Member	7	7	100%

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	17 Maret 2021 March 17, 2021	Closing Meeting Audit Laporan Keuangan Tahun 2020 2020 Financial Statement Audit Closing Meeting	3
2.	02 Juni 2021 June 2, 2021	Tugas Komite Audit dan Pending Matters Duties of the Audit Committee and Pending Matters	4
3.	9 Juni 2021 June 9, 2021	Rapat Koordinasi Komite Audit dan SKAI BRI Agro Coordination Meeting of Audit Committee and SKAI BRI Agro	4
4.	05 Agustus 2021 August 5, 2021	Kick off Meeting Audit Laporan Keuangan 31 Juli 2021 Kick off Meeting on Audit of Financial Statements July 31, 2021	4
5.	20 September 2021 September 20, 2021	Entrance Meeting OJK OJK Entrance Meeting	4
6.	22 September 2021 September 22, 2021	Closing Meeting Audit Laporan Keuangan 31 Juli Tahun 2021 Financial Statement Audit Closing Meeting July 31, 2021	4
7.	11 Oktober 2021 October 11, 2021	Rapat Komite Audit dan SKAI BRI Agro BRI Agro's Audit Committee and SKAI Meeting	4
8.	17 November 2021 November 17, 2021	Rapat Komite Audit Bank Raya Bank Raya Audit Committee Meeting	4

Kebijakan dan Besaran Remunerasi Bagi Komite Audit

Audit Committee Remuneration Policy and Amount

Remunerasi & Fasilitas Remuneration & Facility	Komite Audit Audit Committee	
	Jumlah Total	Rp (juta) IDR (Million)
Honorarium	2	480.000.000
Tantiem	-	-
Tunjangan Allowance	-	-
Total	2	480.000.000

Pengembangan Kompetensi Komite Audit

Development of Audit Committee Competencies

Untuk menunjang Komite Audit dalam melaksanakan tugas dan tanggung jawabnya, Bank Raya memberikan kesempatan kepada anggota Komite Audit untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal Bank atau yang diselenggarakan oleh pihak eksternal.

Bank Raya offers opportunities for Audit Committee members to engage in training and competence development programmes, either provided by the Bank or by third parties, to assist the Audit Committee in carrying out its tasks and obligations.

Sepanjang tahun 2021, anggota Komite Audit telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

Members of the Audit Committee engaged in the following training and competence development activities during the year 2021:

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organiser	Waktu dan Tempat Time and place
Antonius Suryanta	Anggota Komite Audit	Refreshment Manajemen Risiko Level 1 – 4	PT EfektifPro Knowledge	Jakarta, 18 Oktober 2021
	Audit Committee Member	Refreshment Risk Management Level 1 – 4		Jakarta, 18 October 2021
Ari Setyo Wibowo	Anggota Komite Audit	Refreshment Manajemen Risiko Level 1 – 4	PT EfektifPro Knowledge	Jakarta, 18 Oktober 2021
	Audit Committee Member	Refreshment Risk Management Level 1 – 4		Jakarta, 18 October 2021

Pelaksanaan Tugas Komite Audit Implementation of the Audit Committee's Duties

Selama tahun 2021, Komite Audit telah melaksanakan tugas antara lain sebagai berikut:

1. Membuat laporan evaluasi kinerja SKAI per triwulan.
2. Membuat rekomendasi penunjukan KAP/AP.
3. Membuat rekomendasi penetapan penunjukan Kepala SKAI.
4. Membuat rekomendasi penunjukan KAP/AP.
5. Membuat laporan pengawasan RBB per triwulan.
6. Membuat laporan evaluasi pelaksanaan audit laporan keuangan tahun 2020.
7. Membuat rekomendasi Perencanaan Audit Tahunan (PAT) 2022.
8. Membuat revisi Piagam Komite Audit.

The Audit Committee performed the following functions in 2021, among others:

1. Create a quarterly report on the SKAI's performance.
2. Make suggestions for KAP/AP appointment.
3. Make suggestions about the hiring of the SKAI's chief executive officer.
4. Make suggestions on the KAP/appointment. AP's
5. Submit RBB supervision reports on a quarterly basis.
6. Prepare an assessment report on the 2020 financial statement audit's execution.
7. Make suggestions about the annual audit planning for 2022. (PAT).
8. Revise the Charter of the Audit Committee.

Komite Pemantau Risiko

Risk Monitoring Committee

Komite pemantau risiko dibentuk oleh Dewan Komisaris dalam rangka membantu Dewan Komisaris menjalankan tugas dan tanggung jawab Dewan Komisaris, khususnya yang terkait dengan bidang manajemen risiko.

The Board of Commissioners set up the risk monitoring committee to help the Board of Commissioners do its job, especially when it comes to risk management.

Dasar Hukum

Legal Foundation

1. Peraturan OJK Nomor 18/POJK.03/2016 penerapan Manajemen risiko Bagi Bank Umum. 2. Peraturan OJK Nomor 38/POJK.03/2016 tentang penerapan Manajemen risiko dan penggunaan teknologi Informasi oleh Bank Umum. 3. Peraturan OJK Nomor 55/POJK.03/2016 tentang penerapan tata Kelola Bank Umum. 4. Peraturan OJK Nomor 46/POJK.03/2017 tentang pelaksanaan Fungsi Kepatuhan Bank Umum. 5. Peraturan OJK lainnya yang memiliki kaitan dengan tugas dan wewenang Komite pemantau risiko. 6. Anggaran Dasar Bank Raya terakhir yang dituangkan dalam Akta No.18 tanggal 27 April 2021, dibuat dihadapan Mochamad Nova Faisal, S.H., M.K.n., Notaris di Jakarta. dan telah mendapatkan persetujuan dari Menteri Hukum dan Hak asasi Manusia Republik Indonesia No.AHU-AH.01.03.0271778 Tahun 2021 tanggal 28 April 2021.	1. Risk Management Implementation for Commercial Banks in accordance with OJK Regulation 18/POJK.03/2016. 2. FSA Regulation No. 38/POJK.03/2016 on commercial banks' risk management and use of information technology. 3. FSA Regulation No. 55/POJK.03/2016 on Commercial Banks' Good Corporate Governance. 4. FSA Regulation No. 46/POJK.03/2017 on the Implementation of Commercial Banks' Compliance Function. 5. Additional FSA laws pertaining to the Risk Monitoring Committee's responsibilities and authority. 6. The most recent Bank Raya Articles of Association, as set out in Deed No.18 dated April 27, 2021, and prepared in the presence of Mochamad Nova Faisal, S.H., M.K.n., Notary in Jakarta. It was approved by the Minister of Law and Human Rights of the Republic of Indonesia on April 28, 2021, with the number AHU-AH.01.03.0271778 of 2021.

Piagam Komite Pemantau Risiko

Risk Monitoring Committee Charter

Pedoman Kerja Komite Pemantau Risiko yang telah direvisi sesuai dengan risalah rapat Dewan Komisaris No. 81/SDK-XII/2021 tanggal 29 Desember 2021 tentang *update* Pedoman Kerja Dewan Komisaris, Komite dan Sekretaris Dewan Komisaris dan yang terakhir adalah Surat Keputusan Dewan Komisaris No Kpts B.01/KOM/SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman dan Tata Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Piagam Komite Pemantau Risiko akan ditinjau kembali secara berkala untuk menyesuaikan dengan ketentuan yang berlaku.

The Risk Monitoring Committee has been revised in accordance with the minutes of the Board of Commissioners meeting No. 81/ SDK-XII/2021 dated December 29, 2021 regarding the update of the Work Guidelines for the Board of Commissioners, Committees, and Secretary to the Board of Commissioners, and the Board of Commissioners Decree No. B.01/KOM/SKP/12/2021 dated December 29, 2021 regarding the Guidelines and Work Procedure of the Board of The charter of the Risk Monitoring Committee will be reviewed on a regular basis to make sure it meets all the rules.

Dalam ketentuan tersebut diatur mengenai:

1. Dasar hukum
2. Tugas, tanggung jawab dan kewenangan
3. Organisasi
4. Etika kerja
5. Waktu kerja
6. Rapat
7. Korespondensi dan
8. Pelaporan.

It is controlled under these clauses regarding:

1. A legal basis
2. Authority, responsibilities, and obligations
3. Structure
4. Professionalism
5. Working hours
6. Convening
7. Correspondence and
8. Accountability

Kriteria Anggota Komite Pemantau Risiko

Criteria for the Selection of Risk Monitoring Committee Members

Dalam pedoman Komite pemantau risiko disebutkan persyaratan keanggotaan antara lain:

1. Anggota Komite wajib memiliki integritas, akhlak, dan moral yang baik;
2. Wajib memiliki kemampuan, pengetahuan, pengalaman sesuai dengan pekerjaannya serta mampu berkomunikasi dengan baik;
3. Bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan;
4. Anggota Direksi dilarang menjadi anggota Komite.

According to the Risk Monitoring Committee's rules, membership criteria include the following:

1. Committee members must possess a high level of honesty, character, and morality.
2. must have the necessary skills, knowledge, and experience for the job and be able to communicate effectively;
3. Consistently improving competency through education and training
4. Committee members may not be members of the Board of Directors.

Ketentuan Masa Jabatan

Terms of Office

Masa tugas anggota Komite tidak boleh lebih lama dari masa jabatan Dewan Komisaris sebagaimana diatur dalam Anggaran Dasar dan dapat dipilih kembali hanya untuk 1 (satu) periode berikutnya.

The committee members' terms of office may not exceed the term of the Board of Commissioners as specified in the Articles of Association, and they may be re-elected only for the following one (1) session.

Susunan, Jumlah, Komposisi dan Dasar Pengangkatan Komite Pemantau Risiko

1. Anggota Komite paling kurang terdiri dari 3 (tiga) orang, salah satu di antaranya adalah Komisaris Independen yang akan bertindak sebagai Ketua Komite.
2. Komite beranggotakan paling sedikit:
 - 1 (satu) orang Komisaris Independen
 - 1 (satu) orang pihak Independen yang memiliki keahlian di bidang keuangan dengan pengalaman kerja minimal 5 (lima) tahun
 - 1 (satu) orang pihak Independen yang memiliki keahlian di bidang manajemen risiko dengan pengalaman kerja minimal 2 (dua) tahun
3. Komite diketuai oleh Komisaris Independen merangkap sebagai anggota.
4. Ketua Komite dilarang merangkap jabatan sebagai ketua komite lebih dari 1 (satu) pada komite lain.
5. Komisaris Independen dan pihak Independen yang menjadi anggota Komite paling sedikit berjumlah 51% (lima puluh satu persen) dari jumlah anggota Komite.
6. Semua anggota Komite dipilih oleh Dewan Komisaris melalui mekanisme perekrutan dan seleksi.
7. Persyaratan keanggotaan:
 - Anggota Komite wajib memiliki integritas, akhlak dan moral yang baik
 - Wajib memiliki kemampuan, pengetahuan, pengalaman sesuai dengan pekerjaannya serta mampu berkomunikasi dengan baik

The Risk Monitoring Committee's Structure, Total, Composition, and Method Of Appointment

1. The Committee must be composed of at least three (3) members. One of them will be an Independent Commissioner who will serve as Chairman.
2. The Committee should consist of at least the following:
 - 1 (one) independent commissioner
 - 1 (one) independent party with financial competence and at least 5 (five) years of professional experience
 - 1 (one) independent party with risk management knowledge and at least 2 (two) years of work experience
3. The Chair of the Committee is an Independent Commissioner who is also a member.
4. A committee chairman may not be the chairman of more than one (1) additional committee at the same time.
5. Independent Commissioners and independent parties represented on the committee account for at least 51% (fifty one percent) of the committee's total membership.
6. The Board of Commissioners decides who will be on the Committee. They do this by looking for and choosing people.
7. Membership Eligibility:
 - Committee members must possess a high level of integrity, character, and morality.
 - Must possess the necessary skills, expertise, and experience for the job and be able to communicate effectively.

- Bersedia meningkatkan kompetensi secara terus-menerus melalui pendidikan dan pelatihan
- Anggota Direksi dilarang menjadi anggota Komite
- Consistently enhancing competency via education and training
- No member of the Board of Directors may serve on the Committee.

Hingga akhir tahun 2021, susunan Komite Pemantau Risiko adalah sebagai berikut:

Until the end of 2021, the Risk Monitoring Committee will be composed as follows:

Nama Name	Jabatan Position	Posisi Position	Dasar Hukum Pengangkatan Legal Basis of Appointment	Keahlian Skill	Masa Jabatan Terms of Office
Eko B. Supriyanto	Ketua	Komisaris Independen	Surat Keputusan Direksi No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Perbankan/ Keuangan, Jurnalistik	23 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Chairman	Independent Commissioner	Decree of the Board of Directors No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Banking/ Finance, Journalism	July 23, 2021 until the closing of the 2024 Annual GMS
Budi Satria	Anggota	Komisaris Utama	Surat Keputusan Direksi No. Kpts. R.05/Dir.01.02/HCP/08/2020 tanggal 4 Agustus 2020	Perbankan, Keuangan, Audit	1 Agustus 2020 s.d Penutupan RUPS Tahunan Tahun 2023
	Member	President Commissioner	Decree of the Board of Directors No. Kpts. R.05/Dir.01.02/HCP/08/2020 August 4, 2020	Banking, Finance, Audit	August 1, 2020 sd GMS Closing Annual Year 2023
Achmad F.C. Barir	Anggota	Komisaris	Surat Keputusan Direksi No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Perbankan/ Keuangan, Credit Analyst	19 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Member	Commissioner	Decree of the Board of Directors No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Banking/ Finance, Credit Analyst	July 19, 2021 until the closing of the 2024 Annual GMS
Rina Saadah	Anggota	Komisaris Independen	Surat Keputusan Direksi No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Pertanian, Perikanan dan Kebijakan Publik	19 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Member	Independent Commissioner	Decree of the Board of Directors No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Agriculture, Fisheries and Public Policy	July 19, 2021 until the closing of the 2024 Annual GMS
Teguh Pramono	Anggota	Pihak Independen	Surat Keputusan Direksi No. Kpts. R.101/Dir.01.02/HCP/PHC/03/2021 tanggal 24 Maret 2021	Perbankan/ Keuangan	1 April 2021 s.d 31 Maret 2023
	Member	Independent Party	Decree of the Board of Directors No. Kpts. R.101/Dir.01.02/HCP/PHC/03/2021 dated March 24, 2021	Banking/ Finance	April 1, 2021 to 31 March 2023
Triwidodo	Anggota	Pihak Independen	Surat Keputusan Direksi No. Kpts. R.1563.A/Dir.01.03/HCP/TML/10/2021 tanggal 11 Oktober 2021	Perbankan/ Keuangan, Risk Management	11 Oktober 2021 s.d 10 Oktober 2023
	Member	Independent Party	Decree of the Board of Directors No. Kpts. R.1563.A/Dir.01.03/HCP/TML/10/2021 dated October 11, 2021	Banking/ Finance, Risk Management	October 11, 2021 to October 10, 2023

Profil Anggota Komite Pemantau Risiko Profile of Risk Monitoring Committee

Nama Name	Eko B. Supriyanto
Jabatan Position	Ketua Komite Pemantau Risiko Head of the Risk Monitoring Committee
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section

Nama Name	Budi Satria
Jabatan Position	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.05/Dir.01.02/HCP/08/2020 tanggal 4 Agustus 2020 Decree of the Board of Directors No. Kpts. R.05/Dir.01.02/HCP/08/2020 August 4, 2020

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section

Nama Name	Achmad F.C. Barir
Jabatan Position	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section

Nama Name	Rina Saadah
Jabatan Position	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.170/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
Her profile can be seen in the Profile of the Board of Commissioners in the Company Profile section



Teguh Pramono
Anggota Komite Pemantau Risiko
 Member of the Risk Monitoring Committee

Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.101/Dir.01.02/HCP/PHC/03/2021 tanggal 24 Maret 2021 Decree of the Board of Directors No. Kpts. R.101/Dir.01.02/HCP/PHC/03/2021 dated March 24, 2021
Usia Age	58 tahun/years of age
Riwayat Pendidikan Educational background	- Sarjana Hukum, Universitas Airlangga (1982) - Magister Manajemen, Universitas Airlangga (1999) - Bachelor of Law, Airlangga University (1982) - Master of Management, Airlangga University (1999)
Riwayat Pekerjaan Employment history	- Wakil Kepala Divisi Bisnis 1 (Captive) PT BRI Asuransi Indonesia (2019-2020) - Wakil Pemimpin Wilayah BRI Kanwil Jakarta 1 (2018-2019) - Wakil Pemimpin Wilayah BRI Kanwil Makassar (2017-2018) - Deputy Head of Business Division 1 (Captive) PT BRI Asuransi Indonesia (2019-2020) - Deputy Regional Head of BRI Regional Office Jakarta 1 (2018-2019) - Deputy Regional Head of BRI Regional Office Makassar (2017-2018)
Keahlian Skill	Perbankan/Keuangan Banking/Finance



Triwidodo
Anggota Komite Pemantau Risiko
 Member of the Risk Monitoring Committee

Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.1563.A/Dir.01.03/HCP/TML/10/2021 tanggal 11 Oktober 2021 Decree of the Board of Directors No. Kpts. R.1563.A/Dir.01.03/HCP/TML/10/2021 dated October 11, 2021
Usia Age	56 tahun/years of age
Riwayat Pendidikan Educational background	- Sarjana Ekonomi, Universitas Gajah Mada (1990) - Magister Manajemen Internasional Bisnis, Universitas Gajah Mada (2000) - Bachelor of Economics, Gajah Mada University (1990) - Master in International Business Management, Gajah Mada University (2000)
Riwayat Pekerjaan Employment history	- VP, Regional Risk Management Team BRI (2020-2021) - VP, Executive Risk Officer BRI (2019-2020) - Assistant VP, Credit Risk Analysis Division BRI (2013-2019) - VP, Regional Risk Management Team BRI (2020-2021) - VP, Executive Risk Officer BRI (2019-2020) - Assistant VP, Credit Risk Analysis Division BRI (2013-2019)
Keahlian Skill	Perbankan/Keuangan, Risk Management Banking/Finance, Risk Management

Tugas dan Tanggung Jawab Occupational Duties and Obligations

Komite bertugas untuk membantu Dewan Komisaris dalam melaksanakan tugas pengawasan terhadap *risk and control system* yang mencakup:

1. Melakukan pemantauan dan evaluasi kesesuaian antara manajemen risiko dengan pelaksanaan kebijakan Bank.
2. Melakukan pemantauan dan evaluasi pelaksanaan tugas komite manajemen risiko dan satuan kerja manajemen risiko.
3. Melakukan *review* pelaksanaan manajemen risiko yang terdiri dari laporan profil risiko, laporan tingkat kesehatan Bank dan laporan terkait pengelolaan jenis risiko.
4. Memantau kecukupan proses identifikasi, pengukuran, pemantauan, pengendalian dan sistem informasi manajemen risiko.
5. Menyampaikan laporan atas kegiatan Komite pemantau risiko kepada Dewan Komisaris termasuk laporan yang akan disajikan dalam Laporan tahunan Bank serta laporan atas penugasan yang diberikan oleh Dewan Komisaris.
6. Memberikan masukan kepada Dewan Komisaris atas hal-hal yang perlu mendapat perhatian terkait penerapan manajemen risiko.

The Committee's mandate is to help the Board of Commissioners in carrying out its supervisory responsibilities for the risk and control system, which include the following:

1. Monitoring and analysing the alignment of risk management and Bank policy execution.
2. Supervising and assessing the risk management committee's and risk management work unit's performance.
3. Conducting a review of risk management implementation, which includes a risk profile report, a report on the Bank's soundness level, and reports on the management of certain categories of risk.
4. Ensuring the appropriateness of the information system for identification, measurement, monitoring, control, and risk management.
5. Reporting to the Board of Commissioners on the Risk Monitoring Committee's actions, including reports for inclusion in the Bank's annual report and reports on Board of Commissioners assignments.
6. Making recommendations to the Board of Commissioners on issues requiring attention in the execution of risk management.

Wewenang Komite Pemantau risiko The Risk Monitoring Committee's Authority

Komite pemantau risiko dalam lingkup tanggung jawabnya mempunyai kewenangan untuk dapat:

1. Mengakses/memperoleh informasi yang *relevan* berkaitan dengan pelaksanaan tugasnya dari pihak internal maupun eksternal Perseroan.
2. Memberikan pendapat dan rekomendasi kepada Dewan Komisaris dalam rangka meningkatkan efektivitas pengelolaan risiko Perseroan.
3. Memberikan pendapat dan rekomendasi kepada Dewan Komisaris dalam rangka meningkatkan kualitas pelaksanaan fungsi Kepatuhan Perseroan.
4. Melakukan koordinasi dengan komite lain, Direksi dan unit kerja lain untuk menggali informasi lebih dalam.
5. Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris

Within the extent of its power, the risk monitoring committee has the ability to:

1. Accessing/obtaining pertinent information from internal and external parties of the Company on the performance of their tasks.
2. Making suggestions to the Board of Commissioners on how to enhance the Company's risk management effectiveness.
3. Making suggestions to the Board of Commissioners in order to enhance the quality of the Compliance function's execution.
4. Collaborating with other committees, the Board of Directors, and other work groups to do more research.
5. Carrying out any additional responsibilities delegated by the Board of Commissioners

Independensi Komite Pemantau Risiko The Risk Monitoring Committee's Independence

Seluruh anggota Komite pemantau risiko 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 atau hubungan dengan bank, yang dapat mempengaruhi kemampuannya bertindak independen.

All members of the Risk Monitoring Committee who are appointed by independent parties have no financial, management, share ownership, or familial ties to the Board of Commissioners, the Board of Directors, or the controlling shareholder, or to the bank, which could impair their ability to act independently.

Aspek Independensi Independence Aspect	Eko B. Suprianto	Budi Satria	Achmad F.C. Barir	Rina Saadah	Teguh Pramono	Triwidodo
Tidak memiliki hubungan afiliasi dengan kantor akuntan publik yang memberikan jasa audit dan/atau non-audit kepada perusahaan. S/he has no affiliation with a public accounting firm that provides audit and/or non-audit services to the company.	√	√	√	√	√	√
Tidak memiliki hubungan afiliasi dengan Pemegang Saham, Dewan Komisaris, serta Direksi. S/he has no affiliation with the Shareholders, the Board of Commissioners, and the Board of Directors.	√	√	√	√	√	√
Tidak memiliki hubungan usaha secara langsung dan tidak langsung dengan perusahaan S/he does not have a direct or indirect business relationship with the company	√	√	√	√	√	√
Tidak memiliki hubungan kepengurusan dengan perusahaan. S/he has no management relationship with the company.	√	√	√	√	√	√
Tidak memiliki saham langsung maupun tidak langsung di perusahaan. S/he does not own direct or indirect shares in the company.	√	√	√	√	√	√

Rapat Komite Pemantau Risiko Meeting of the Risk Monitoring Committee

Komite menyelenggarakan rapat sesuai dengan kebutuhan atau sekurang-kurangnya 1 kali dalam 3 bulan, rapat Komite dapat dilaksanakan apabila dihadiri oleh sekurang-kurangnya 51% dari seluruh jumlah anggota termasuk satu orang Komisaris Independen dan satu pihak Independen.

Keputusan rapat Komite diambil berdasarkan musyawarah mufakat. Dalam hal musyawarah mufakat tidak tercapai, maka keputusan diambil berdasarkan suara terbanyak. Hasil rapat Komite wajib dituangkan dalam risalah rapat dan didokumentasikan secara baik. Perbedaan pendapat (*dissenting opinions*) yang terjadi dalam rapat Komite, wajib dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaan pendapat tersebut.

Sepanjang tahun 2021, Komite Pemantau Risiko melaksanakan rapat internal sebanyak 8 kali dengan agenda dan frekuensi kehadiran sebagai berikut:

The Committee meets as required or at least once every three months if at least 51% of the entire number of members, including one Independent Commissioner and one independent party, present.

Decisions during committee meetings are made via discussion and consensus. If no agreement is established after consideration, the decision is made by majority vote. The Committee meeting's outcome must be reported in the meeting's minutes and properly recorded. Dissenting views expressed at Committee meetings must be documented in detail in the meeting minutes, together with the reasons for the differences of opinion.

The Risk Monitoring Committee had eight internal sessions throughout 2021, with the following topic and attendance frequency:

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
Anna Maria Tjiadarma	Ketua Komite Pemantau Risiko Head of the Risk Monitoring Committee	2	2	100%
I.B.K. Suamba Manuaba	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	2	0	0%
Sihar Moreno Hutabarat	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	2	2	100%
Chicca Kartika Sari	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	4	4	100%
Eko B. Supriyanto	Ketua Komite Pemantau Risiko Head of the Risk Monitoring Committee	6	6	100%
Budi Satria	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	8	8	100%
Achmad F.C. Barir	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	6	6	100%
Rina Saadah	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	6	6	100%
Teguh Pramono	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	6	6	100%
Triwidodo	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	3	3	100%

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	15 Maret 2021 March 15, 2021	Rencana <i>Revamping</i> Divisi Segmen Menengah Medium Segment Division Revamping Plan	4
2.	17 Maret 2021 March 17, 2021	Saran Dewan Komisaris kepada Direksi terkait Kualitas Kredit dan Hasil Audit EY Board of Commissioners' advice to the Board of Directors regarding Credit Quality and Audit Results EY	4
3.	10 Mei 2021 May 10, 2021	<i>Stress Test</i> Portofolio Kredit Credit Portfolio Stress Test	6
4.	14 Juni 2021 June 14, 2021	1. Program Kerja Manajemen Risiko dan Kepatuhan Tahun 2021 2. Persiapan Unit Kerja Manajemen Risiko dan Kepatuhan dalam menghadapi Transformasi Digital BRI Agro 1. Risk Management and Compliance Work Program 2021 2. Preparation of the Risk Management and Compliance Work Unit in the face of BRI Agro's Digital Transformation	6
5.	06 Oktober 2021 October 6, 2021	Pembahasan SK Kebijakan Penerapan Tata kelola Perusahaan yang Baik Discussion of Decree on Good Corporate Governance Implementation Policy	5
6.	25 Oktober 2021 October 25, 2021	Pembahasan <i>Final Draft</i> Kode Etik BRI Agro Final Discussion of the Draft BRI Agro Code of Conduct	6
7.	03 November 2021 November 3, 2021	Perkembangan <i>Revamp</i> Portofolio Pinjaman Divisi Ritel Agri (<i>Crawl Up</i>) Agri Retail Division Loan Portfolio Revamp Development (<i>Crawl Up</i>)	6
8.	08 November 2021 November 8, 2021	Perkembangan <i>Revamp</i> Portofolio Pinjaman Divisi Bisnis Menengah Medium Business Division Loan Portfolio Revamp Development	6

Kebijakan dan Besaran Remunerasi Bagi Komite Pemantau Risiko

Risk Monitoring Committee Remuneration Policy and Amount

Remunerasi & Fasilitas Remuneration & Facility	Komite Pemantau Risiko Risk Monitoring Committee	
	Jumlah Total	Rp (juta) IDR (Million)
Honorarium	2	480.000.000
Tantiem	-	-
Tunjangan Allowance	-	-
Total	2	480.000.000

Pengembangan Kompetensi Komite Pemantau Risiko

Commitment to Developing the Competences of the Risk Monitoring Committee

Untuk menunjang Komite Pemantau Risiko dalam melaksanakan tugas dan tanggung jawabnya, Bank Raya memberikan kesempatan kepada anggota Komite Pemantau Risiko untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal Bank atau yang diselenggarakan oleh pihak eksternal.

Bank Raya offers opportunities for members of the Risk Monitoring Committee to engage in training and competence development programmes, whether provided by the Bank or by third parties, to assist them in carrying out their duties and obligations.

Sepanjang tahun 2021, anggota Komite Pemantau Risiko telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

Members of the Risk Monitoring Committee engaged in the following training and competence development activities during the year 2021:

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organizer	Waktu dan Tempat Time and place
Teguh Pramono	Anggota Komite Pemantau Risiko	Refreshment Manajemen Risiko Level 1 – 4	PT EfektifPro Knowledge	Jakarta, 18 Oktober 2021
	Member of the Risk Monitoring Committee	Refreshment Risk Management Level 1 – 4		Jakarta, 18 October 2021
Triwidodo	Anggota Komite Pemantau Risiko	Refreshment Manajemen Risiko Level 1 – 4	PT EfektifPro Knowledge	Jakarta, 18 Oktober 2021
	Member of the Risk Monitoring Committee	Refreshment Risk Management Level 1 – 4		Jakarta, 18 October 2021

Pelaksanaan Tugas Komite Pemantau Risiko Execution of the Risk Monitoring Committee's Duties

Selama tahun 2021, Komite Pemantau Risiko telah melaksanakan tugas antara lain sebagai berikut:

1. Membuat review laporan Manajemen Risiko, Kepatuhan dan Tata Kelola.
2. Membuat evaluasi pelaksanaan fungsi kepatuhan.
3. Membuat review usulan *Risk Appetite Statement* (RAS) dan memonitor RAS.
4. Memonitor Profil Risiko.
5. Membuat review usulan RBB/revisi RBB/revisi RKAP dari Direksi.
6. Membuat review atas hasil *self assessment* Tingkat Kesehatan Bank (TKB).
7. Memberikan masukan tentang *Loan Review* dari konsultan EY dan memonitor realisasi kredit yang di *revamp*.
8. Memberikan masukan untuk persetujuan Dekom atas usulan *right issue*.
9. Membuat dan mengkoordinir Laporan Pengawasan Dewan Komisaris kepada PSP.
10. Membuat review *draft* laporan Dewan Komisaris yang akan dimuat dalam annual report.
11. Membuat laporan kinerja Komite Pemantau Risiko.
12. Membuat laporan realisasi *Strategic Initiatives*.
13. Membuat kajian atas usulan Surat Keputusan (SK) dari Direksi tentang GCG, Kode Etik, Benturan Kepentingan dan Strategi Anti Penyuapan untuk mendapat persetujuan Dewan Komisaris.

The Risk Monitoring Committee accomplished the following responsibilities in 2021:

1. Examining reports on risk management, compliance, and governance.
2. Evaluating the compliance function's implementation.
3. Reviewing and monitoring the planned Risk Appetite Statement (RAS).
4. Keeping an eye on the risk profile.
5. Reviewing the Board of Directors' recommended RBB / RBB revision / RKAP revision.
6. Conducting a review of the Bank Soundness Level (TKB) self-assessment findings.
7. Provide input to the Loan Review process with the assistance of JE experts and monitor the repayment of restructured loans.
8. Making recommendations to the Board of Commissioners about the proposed rights issue.
9. Preparing and coordinating the Board of Commissioners' Supervisory Report to PSP.
10. Conducting a review of the Board of Commissioners' draught report, which will be included in the annual report.
11. Preparing a report on the Risk Monitoring Committee's performance.
12. Reporting on the implementation of Strategic Initiatives.
13. Reviewing and approving the Board of Commissioners' proposed Decree (SK) on GCG, Code of Conducts, Conflict of Interest, and Anti-Bribery Strategy.

Komite Remunerasi dan Nominasi

Remuneration and Nomination Committee

Komite Remunerasi dan Nominasi adalah salah satu Komite yang dibentuk oleh Dewan Komisaris untuk mendukung efektivitas pelaksanaan tugas dan tanggung jawab Dewan Komisaris, khususnya yang terkait dengan bidang remunerasi dan nominasi.

Bank membentuk Komite Remunerasi dan Nominasi sebagai organ pendukung bagi Dewan Komisaris dalam melaksanakan fungsi remunerasi dan nominasi.

The Remuneration and Nomination Committee is one of the committees formed by the Board of Commissioners to ensure the Board of Commissioners' tasks and obligations, especially those relating to remuneration and nomination, are carried out effectively.

The Bank formed the Remuneration and Nomination Committee to assist the Board of Commissioners in discharging its remuneration and nomination responsibilities.

Dasar Hukum

Legal Foundation

1. Peraturan OJK No. 55/POJK.03/2016 tanggal 9 Desember 2016 tentang penerapan tata Kelola Bagi Bank Umum.
2. Peraturan OJK No. 45/POJK.03/2015 tentang penerapan tata Kelola dalam pemberian remunerasi bagi Bank Umum.
3. Peraturan OJK No. 34/POJK.04/2014 tanggal 8 Desember 2014 tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik.
4. SEOJK No.13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum.
5. Anggaran Dasar Bank Raya terakhir yang dituangkan dalam Akta No.18 tanggal 27 April 2021, dibuat dihadapan Mochamad Nova Faisal, S.H., M.K.n., Notaris di Jakarta. dan telah mendapatkan persetujuan dari Menteri Hukum dan Hak asasi Manusia Republik Indonesia No.AHU-AH.01.03.0271778 Tahun 2021 tanggal 28 April 2021.
1. FSA Regulation No. 55/POJK.03/2016 on 9 December 2016 on Good Corporate Governance in Commercial Banks.
2. FSA Regulation No. 45/POJK.03/2015 on Good Corporate Governance in Commercial Bank Remuneration.
3. FSA Regulation No. 34/POJK.04/2014 of December 8, 2014, pertaining to the Nomination and Remuneration Committee for Issuers or Public Companies.
4. SEOJK No.13/SEOJK.03/2017 on the Implementation of Commercial Bank Governance.
5. The most recent Bank Raya Articles of Association, as specified in Deed No.18 dated 27 April 2021, were drawn up before Mochamad Nova Faisal, S.H., M.K.n., Notary in Jakarta, and received approval from the Minister of Law and Human Rights of the Republic of Indonesia on April 28, 2021, with the approval number AHU-AH.01.03.0271778 of 2021.

Piagam Komite Remunerasi dan Nominasi

Charter of the Remuneration and Nominations Committee

Pedoman Kerja Komite Remunerasi dan Nominasi yang telah direvisi sesuai dengan risalah rapat Dewan Komisaris No. 81/SDK-XII/2021 tanggal 29 Desember 2021 tentang update Pedoman Kerja Dewan Komisaris, Komite dan Sekretaris Dewan Komisaris dan yang terakhir adalah Surat Keputusan Dewan Komisaris No Kpts B.01/KOM/SKP/12/2021 tanggal 29 Desember 2021 tentang Pedoman dan Tata Kerja Dewan Komisaris, Komite Audit, Komite Remunerasi dan Nominasi, Komite Pemantau Risiko dan Sekretaris Dewan Komisaris. Piagam Komite Remunerasi dan Nominasi akan ditinjau kembali secara berkala untuk menyesuaikan dengan ketentuan yang berlaku.

Pedoman kerja Komite Remunerasi dan Nominasi berisikan antara lain:

1. Dasar hukum
2. Tugas, tanggung jawab dan kewenangan
3. Organisasi
4. Etika kerja

Remuneration and Nomination Committee Working Guidelines, which have been revised in accordance with the minutes of the Board of Commissioners meeting No. 81/SDK-XII/2021 dated December 29, 2021 regarding the update of the Board of Commissioners, Committees, and Secretary to the Board of Commissioners Work Guidelines, and the Board of Commissioners Decree No. Kpts B.01/KOM/SKP/12/2021 dated December 29, 2021 regarding Guidelines and Work Procedures. The charter of the Remuneration and Nomination Committee shall be reviewed on a quarterly basis to ensure compliance with relevant rules.

The Remuneration and Nomination Committee's work guidelines include the following:

1. Legal foundation
2. Responsibilities, obligations, and authority
3. Structure
4. Professionalism

5. Waktu kerja
6. Rapat
7. Korespondensi dan
8. Pelaporan.

5. Working hours
6. Convening
7. Correspondence and
8. Accountability.

Ketentuan Masa Jabatan

Terms of Office

Masa tugas anggota Komite Remunerasi dan Nominasi tidak boleh lebih dari masa jabatan Dewan Komisaris sebagaimana diatur dalam Anggaran Dasar dan dapat dipilih kembali hanya untuk 1 (satu) periode berikutnya.

Members of the Remuneration and Nomination Committee may serve for no more than the time specified in the Articles of Association for the Board of Commissioners and may be re-elected only for the following 1 (one) session.

Susunan, Jumlah, Komposisi dan Dasar Pengangkatan Komite Remunerasi dan Nominasi

The Remuneration and Nomination Committee's Composition, Total, Composition, and Basis for Appointment

Susunan Keanggotaan Komite Remunerasi dan Nominasi adalah sebagai berikut:

1. Anggota Komite Remunerasi dan Nominasi paling kurang terdiri dari 3 (tiga) orang, salah satu di antaranya adalah Komisaris Independen yang akan bertindak sebagai Ketua Komite;
2. Anggota Komite paling kurang terdiri dari:
 - Seorang Komisaris Independen;
 - Seorang Komisaris
 - Pejabat eksekutif yang membawahi unit kerja Sumber Daya Manusia.
 - Apabila dipandang perlu anggota Komite dapat berasal dari pihak independen.
3. Dalam hal anggota Komite Remunerasi dan Nominasi ditetapkan lebih dari 3 (tiga) orang maka anggota Komisaris Independen paling sedikit berjumlah 2 (dua) orang. Komite diketuai oleh Komisaris Independen merangkap sebagai anggota.
4. Ketua Komite dilarang merangkap jabatan sebagai Ketua Komite lain lebih dari 1 (satu) pada komite lainnya.
5. Semua anggota Komite dipilih oleh Dewan Komisaris melalui mekanisme perekrutan dan seleksi.
6. Persyaratan keanggotaan:
 - Anggota Komite wajib memiliki integritas, akhlak, dan moral yang baik.
 - Wajib memiliki kemampuan, pengetahuan, pengalaman sesuai dengan pekerjaannya, serta mampu berkomunikasi dengan baik.
 - Bersedia meningkatkan kompetensi secara terus-menerus melalui pendidikan dan pelatihan.
 - Anggota Direksi dilarang menjadi anggota Komite Remunerasi dan Nominasi.

The Remuneration and Nomination Committee is composed of the following members:

1. The Remuneration and Nomination Committee should consist of at least three (three) members, one of whom will be an Independent Commissioner who will serve as Chair;
2. The Committee should be composed of at least the following members:
 - An Independent Commissioner;
 - A Commissioner;
 - Executive officer with responsibility for the Human Resources work unit.
 - If judged essential, the Committee may include members from an independent political party.
3. If the Remuneration and Nomination Committee is decided to have more than three (three) members, the Independent Commissioner should have a minimum of two (two) members. The Chair of the Committee is an Independent Commissioner who is also a member.
4. A Committee Chair may not serve concurrently as Chair of more than one (one) additional committees.
5. The Board of Commissioners elects all members of the Committee via a recruiting and selection process.
6. Eligibility for membership:
 - Committee members must possess a high degree of honesty, character, and morality.
 - Must possess the necessary skills, knowledge, and experience for the job, as well as the ability to communicate effectively.
 - Consistently enhancing competency via education and training.
 - Board of Directors members are not permitted to serve on the Remuneration and Nomination Committee.

Hingga akhir tahun 2021, susunan Komite Remunerasi dan Nominasi adalah sebagai berikut:

Until the end of 2021, the Remuneration and Nomination Committee will be composed as follows:

Nama Name	Jabatan Position	Posisi Position	Dasar Hukum Pengangkatan Legal Basis of Appointment	Keahlian Skill	Masa Jabatan Terms of Office
Rama Notowidigdo	Ketua	Komisaris Independen	Surat Keputusan Direksi No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Information Technology, Bisnis Digital	19 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Chairman	Independent Commissioner	Decree of the Board of Directors No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Information Technology, Digital Business	July 19, 2021 until the closing of the 2024 Annual GMS
Budi Satria	Anggota Member	Komisaris Utama	Surat Keputusan Direksi No. Kpts.R.04/Dir.01.02/HC P/12/2020 tanggal 11Desember 2020	Perbankan, Keuangan, Audit	1 Agustus 2020 s.d Penutupan RUPS Tahunan Tahun 2023
		President Commissioner	Decree of the Board of Directors No. Kpts.R.04/Dir.01.02/HC P/12/2020 the December 11, 2020	Banking, Finance, Audit	August 1, 2020 sd GMS Closing Annual Year 2023
Eko B. Supriyanto	Anggota	Komisaris Independen	Surat Keputusan Direksi No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021	Perbankan/ Keuangan, Jurnalistik	23 Juli 2021 s.d penutupan RUPS Tahunan tahun 2024
	Member	Independent Commissioner	Decree of the Board of Directors No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021	Banking/ Finance, Journalism	July 23, 2021 until the closing of the 2024 Annual GMS
Yudi Malela	Anggota	Pihak Independen	Surat Keputusan Direksi No. Kpts. R.87/Dir.01.02/HCP/PHC/03/2021 tanggal 12 Maret 2021	Perbankan/ Keuangan, Human Capital	8 Maret 2021 s.d 7 Maret 2023
	Member	Independent Party	Decree of the Board of Directors No. Kpts. R.87/Dir.01.02/HCP/PHC/03/2021 dated March 12, 2021	Banking/ Finance, Human Capital	March 8, 2021 to March 7, 2023
Sri Widiyati	Anggota	Pejabat Eksekutif Kepala Divisi Human Capital	Surat Keputusan Direksi No. Kpts. R.04/Dir.01.02/HCP//12/2020 tanggal 11 Desember 2020	Perbankan/ Keuangan dan MSDM	Ex-Officio
	Member	Executive Officer Head of Division Human Capital	Decree of the Board of Directors No. Kpts. R.04/Dir.01.02/HCP//12/2020 December 11, 2020	Banking/ Finance and HRM	Ex-Officio

Profil Anggota Komite Remunerasi dan Nominasi

Profile of Remuneration and Nomination Committee

Nama Name	Rama Notowidigdo
Jabatan Position	Ketua Komite Remunerasi dan Nominasi Chairman of the Remuneration and Nomination Committee
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section

Nama Name	Budi Satria
Jabatan Position	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section

Nama Name	Eko B. Supriyanto
Jabatan Position	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Dewan Komisaris pada bab Profil Perusahaan
His profile can be seen in the Profile of the Board of Commissioners in the Company Profile section



Yudi Malela
Anggota Komite Pemantau Risiko
 Member of the Risk Monitoring Committee

Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.87/Dir.01.02/HCP/PHC/03/2021 tanggal 12 Maret 2021 Decree of the Board of Directors No. Kpts. R.87/Dir.01.02/HCP/PHC/03/2021 dated March 12, 2021
Usia Age	59 tahun/years of age
Riwayat Pendidikan Educational background	Sarjana Hukum, Keperdataan Universitas Padjadjaran (1986) Bachelor of Law, Civil, Padjadjaran University (1986)
Riwayat Pekerjaan Employment history	- Kepala Divisi <i>Human Capital</i> PT BRI Agro (2017 sd 2020) - Kepala Bagian <i>Human Capital</i> Kanwil BRI Jakarta 2 (2016 sd 2017) - Kepala Bagian <i>Human Capital</i> Kanwil BRI Bandung (2015 sd 2016)
Keahlian Skill	Perbankan/Keuangan, SDM Banking/Finance, Human Capital

Nama Name	Sri Widiyati
Jabatan Position	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member
Dasar Hukum Pengangkatan Legal Basis of Appointment	Surat Keputusan Direksi No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 tanggal 6 Mei 2021 Decree of the Board of Directors No. Kpts. R.169/Dir.03.04/HCP/PHC/05/2021 dated May 6, 2021

Profil beliau dapat dilihat pada bagian Profil Kepala Divisi *Human Capital* pada bab Profil Perusahaan
 Her profile can be seen in the Profile of the Head of the Human Capital Division in the Company Profile section

Tugas dan Tanggung Jawab Occupational Duties and Obligations

Komite Remunerasi dan Nominasi bertugas untuk membantu Dewan Komisaris dalam melaksanakan tugas pengawasan terhadap hal-hal sebagai berikut:

Terkait dengan fungsi remunerasi

1. Melakukan evaluasi secara berkala terhadap penerapan Kebijakan remunerasi
2. Memastikan bahwa kebijakan remunerasi telah sesuai dengan ketentuan yang berlaku.
3. Memberikan rekomendasi kepada Dewan Komisaris mengenai struktur remunerasi, Kebijakan remunerasi dan besaran remunerasi.

The Remuneration and Nomination Committee's aim is to help the Board of Commissioners in carrying out its supervisory responsibilities regarding the following:

In connection with the remuneration function

1. Conduct periodic evaluations of the compensation policy's implementation
2. Ascertain that the pay policy complies with all relevant rules.
3. Make suggestions to the Board of Commissioners about the compensation structure, the compensation policy, and the compensation amount.

Terkait dengan fungsi nominasi

1. Memberikan rekomendasi kepada Dewan Komisaris mengenai sistem serta prosedur pemilihan dan atau penggantian anggota Dewan Komisaris dan Direksi.
2. Membantu Dewan Komisaris melakukan penilaian kinerja anggota Direksi dan/atau anggota Dewan Komisaris berdasarkan tolok ukur yang telah disusun sebagai bahan evaluasi.
3. Memberikan rekomendasi mengenai pihak Independen yang akan menjadi anggota Komite yang ada di bawah koordinasi Dewan Komisaris.

In connection with the nomination function

1. Make recommendations to the Board of Commissioners about the selection and replacement of members of the Board of Commissioners and the Board of Directors.
2. Assist the Board of Commissioners in evaluating the performance of Board of Directors and/or Board of Commissioners members using the benchmarks developed as assessment material.
3. Make recommendations to the Board of Commissioners for Independent parties to join the Committee.

Kewenangan Komite Remunerasi dan Nominasi Authority of the Remuneration and Nominations Committee

Komite Remunerasi dan Nominasi dalam lingkup tanggung jawabnya dapat :

1. Memperoleh informasi yang relevan berkaitan dengan pelaksanaan tugasnya dari pihak internal maupun eksternal.
2. Memberikan pendapat dan rekomendasi kepada Dewan Komisaris dalam rangka memastikan kecukupan Kebijakan remunerasi dan nominasi.
3. Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris.

Within the scope of its tasks, the Remuneration and Nomination Committee may:

1. Obtain pertinent information from internal and external sources on the performance of their jobs.
2. Make suggestions to the Board of Commissioners about the appropriateness of the compensation and nomination rules.
3. Execute any additional duties delegated by the Board of Commissioners.

Independensi Komite Remunerasi dan Nominasi The Remuneration and Nominations Committee's independence

Setiap anggota Komite Remunerasi dan Nominasi diwajibkan memberikan pernyataan independensi, yang diperbarui setiap tahun.

Each member of the Remuneration and Nomination Committee must provide an annual statement of independence.

Aspek Independensi Independence Aspect	Rama Notowidigdo	Budi Satria	Eko B. Supriyanto	Yudi Malela	Sri Widiyati
Tidak memiliki hubungan afiliasi dengan kantor akuntan publik yang memberikan jasa audit dan/atau non-audit kepada perusahaan.	√	√	√	√	√
S/he has no affiliation with a public accounting firm that provides audit and/or non-audit services to the company.					
Tidak memiliki memiliki hubungan afiliasi dengan Pemegang Saham, Dewan Komisaris, serta Direksi.	√	√	√	√	√
S/he gas no affiliation with the Shareholders, the Board of Commissioners, and the Board of Directors.					

Aspek Independensi Independence Aspect	Rama Notowidigdo	Budi Satria	Eko B. Supriyanto	Yudi Malela	Sri Widiyati
Tidak memiliki hubungan usaha secara langsung dan tidak langsung dengan perusahaan. S/he does not have a direct or indirect business relationship with the company	√	√	√	√	√
Tidak memiliki hubungan kepengurusan dengan perusahaan. S/he has no management relationship with the company.	√	√	√	√	√
Tidak memiliki saham langsung maupun tidak langsung di perusahaan. S/he does not own direct or indirect shares in the company.	√	√	√	√	√

Rapat Komite Remunerasi dan Nominasi Meeting of the Remuneration and Nominations Committee

Rapat Komite Remunerasi dan Nominasi diadakan minimal satu kali dalam 4 bulan yang dipimpin oleh Ketua Komite remunerasi dan nominasi. Keputusan rapat Komite Remunerasi dan Nominasi dilakukan berdasarkan musyawarah mufakat, dan apabila tidak tercapai kesepakatan, maka pengambilan keputusan dilakukan berdasarkan suara terbanyak. Hasil rapat Komite Remunerasi dan Nominasi akan disampaikan kepada Dewan Komisaris.

Rapat Komite Remunerasi dan Nominasi dan hanya dapat diselenggarakan apabila:

- Dihadiri oleh mayoritas dari jumlah anggota Komite Remunerasi dan Nominasi (paling sedikit 51% dari jumlah anggota); dan
- Salah satu dari mayoritas jumlah anggota Komite Remunerasi dan Nominasi sebagaimana dimaksud pada huruf a merupakan Ketua Komite Remunerasi dan Nominasi.

Sepanjang tahun 2021, Komite Remunerasi dan Nominasi melaksanakan rapat internal sebanyak 13 Kali dengan frekuensi dan agenda sebagai berikut:

The Remuneration and Nomination Committee meets at least once every four months, chaired by the Chairman. The Remuneration and Nomination Committee meeting's conclusion is obtained by debate and consensus; if no agreement is reached, the decision is reached by majority vote. The Remuneration and Nomination Committee will report its findings to the Board of Commissioners.

Meeting of the Remuneration and Nomination Committee and may only be convened if:

- Attended by a majority of the Remuneration and Nomination Committee's entire membership (at least 51% of total membership); and
- The Chairman of the Remuneration and Nomination Committee is one of the majorities of the members of the Remuneration and Nomination Committee, as defined in paragraph a.

Throughout 2021, the Remuneration and Nomination Committee had 13 internal sessions with the following frequency and agenda:

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
Anna Maria Tjiadarma	Ketua Komite Remunerasi dan Nominasi Chairman of the Remuneration and Nomination Committee	6	6	100%
A.Y. Soepadmo	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member	6	6	100%

Nama Name	Jabatan Position	Jumlah rapat Number of meetings	Kehadiran Presence	Persentase Percentage
Rama Notowidigdo	Ketua Komite Remunerasi dan Nominasi Chairman of the Remuneration and Nomination Committee	7	7	100%
Budi Satria	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member	13	13	100%
Eko B. Supriyanto	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member	7	7	100%
Yudi Malela	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member	12	12	100%
Sri Widiyati	Anggota Komite Remunerasi dan Nominasi Remuneration and Nomination Committee Member	13	12	92%

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	03 Maret 2021 March 3, 2021	1. Self Assessment Calon Anggota KRN 2. Reposisi Anggota KRN 1. Self-Assessment of Prospective KRN Members 2. Reposition of KRN Members	4
2.	08 Maret 2021 March 8, 2021	1. Self Assessment Calon Anggota KPR 2. Reposisi Anggota KPR 1. Self-Assessment of Prospective KPR Members 2. Reposition of KPR Members	5
3.	15 Maret 2021 March 15, 2021	Tantiem Tahun Buku 2020 dan Remunerasi Tahun 2021 Direksi dan Dewan Komisaris BRI Agro Tantiem for Fiscal Year 2020 and Remuneration for 2021 The Board of Directors and Board of Commissioners of BRI Agro	5
4.	17 Maret 2021 March 17, 2021	1. Self Assessment Calon Anggota Komite Audit 2. Reposisi Anggota Komite Audit 1. Self-Assessment of Candidates for Audit Committee Members 2. Reposition of Audit Committee Members	5
5.	29 Maret 2021 March 29, 2021	Evaluasi Anggota Komite Committee Member Evaluation	5
6.	05 April 2021 April 5, 2021	Perubahan Pengurus BRI Agro Changes in the Management of BRI Agro	5
7.	19 Mei 2021 May 19, 2021	Usulan Perubahan Struktur Organisasi Direktorat Bisnis Digital dan Pembentukan Desk Enterprise Risk Management serta Usulan KPI Divisi TSI dan Desk Enterprise Risk Management. Proposed Changes in Organizational Structure of the Digital Business Directorate and Establishment of an Enterprise Risk Management Desk as well as Proposed KPIs for the TSI Division and the Enterprise Risk Management Desk.	5

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
8.	23 Juni 2021 June 23, 2021	Penunjukkan Anggota Komite Tata Kelola Terintegrasi (KTKT) Konglomerasi Keuangan BRI Appointment of Members of the Integrated Governance Committee (KTKT) of the BRI Financial Conglomerate	4
9.	30 Juli 2021 July 30, 2021	Pembahasan Surat Direksi BRI Agro perihal Permohonan Persetujuan Penetapan Kriteria Penerima Sisa Saham MESOP BRI Agro. Discussion on the Letter of the Board of Directors of BRI Agro regarding the Application for Approval for Determination of Criteria for Recipients of the Remaining Shares of MESOP BRI Agro.	5
10.	01 September 2021 September 1, 2021	Pembahasan Kesiapan SDM terkait dengan Transformasi BRI Agro (lanjutan) Discussion on HR Readiness related to BRI Agro Transformation (continued)	5
11.	06 Oktober 2021 October 6, 2021	1. Self Assessment Calon Anggota KPR 2. Reposisi Anggota KPR 1. Self-Assessment of Prospective KPR Members 2. Reposition of KPR Members	5
12.	25 Oktober 2022 October 25, 2022	Pembahasan Pengisian Formasi di kantor pusat BRI Agro Discussion on Filling in Formation at BRI Agro head office	5
13.	22 November 2022 November 22, 2022	Pembahasan <i>draft</i> Desain Remunerasi Bank Raya Indonesia Discussion on the draft of Bank Raya Indonesia's Remuneration Design	5

Kebijakan Suksesi Direksi

Policy on Board of Directors Succession

Suksesi Direksi Bank Raya mengacu kepada peraturan Menteri BUMN No. Per-03/MBU/02/2015 tentang persyaratan, tata cara pengangkatan dan pemberhentian anggota Direksi Badan Usaha Milik negara.

Prosedur suksesi Direksi yang dilakukan Bank adalah sebagai berikut:

1. Komite Remunerasi dan Nominasi mengidentifikasi calon yang memenuhi kriteria;
2. Dewan Komisaris atas dasar saran dari Komite Remunerasi dan Nominasi menyampaikan usulan calon kepada Pemegang Saham;
3. Dalam RUPS dilakukan pengangkatan dan penetapan suksesi Direksi;
4. Calon yang telah disetujui diajukan ke OJK untuk *fit and proper* test dan memberikan persetujuan calon pengurus Bank.

The succession of the Bank Raya Board of Directors is governed by the Minister of State-Owned Companies Regulation No. Per-03/MBU/02/2015 on the requirements, processes, and termination of members of the Board of Directors of state-owned enterprises.

The Bank's succession method is as follows:

1. The Remuneration and Nominations Committee finds candidates who fulfil the eligibility requirements;
2. On the recommendation of the Remuneration and Nomination Committee, the Board of Commissioners proposes the nominated candidate to the Shareholders;
3. The GMS appoints and sets the Board of Directors' successor;
4. The accepted applicant is sent to the FSA for a fit and proper test, which verifies the candidate's qualifications and grants permission to the Bank's management.

Kebijakan dan Besaran Remunerasi Bagi Komite Remunerasi dan Nominasi Remuneration Policy and Amount for Remuneration and Nomination Committee

Remunerasi & Fasilitas Remuneration & Facility	Komite Pemantau Risiko Risk Monitoring Committee	
	Jumlah Total	Rp (juta) IDR (Million)
Honorarium	1	240.000.000
Tantiem	-	-
Tunjangan	-	-
Total	1	240.000.000

Pengembangan Kompetensi Komite Remunerasi dan Nominasi
Untuk menunjang Komite Remunerasi dan Nominasi dalam melaksanakan tugas dan tanggung jawabnya, Bank Raya memberikan kesempatan kepada anggota Komite Remunerasi dan Nominasi untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal Bank atau yang diselenggarakan oleh pihak eksternal.

Development of the Compensation and Nominations Committee's Competencies, Bank Raya offers opportunities for members of the Remuneration and Nomination Committee to engage in training and competence development programmes, whether offered by the Bank or by third parties, to assist them in carrying out their duties and obligations.

Sepanjang tahun 2021, anggota Komite Remunerasi dan Nominasi telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

Members of the Remuneration and Nomination Committee engaged in the following training and competence development activities during the year 2021:

Nama Name	Jabatan Position	Program yang Diikuti Followed Programs	Penyelenggara Organiser	Waktu dan Tempat Time and Place
Sri Widiyati	Anggota Komite Pemantau Risiko dan Nominasi	- FGD Transformasi BRI Agro	Bank Raya	Jakarta, 25 Januari s.d 5 Februari 2021
		- Webinar Fighting with HC Emerging Issues	AHCA (Advanced Human Capital Accomplished)	Jakarta, 23 Maret 2021
		- Webinar Human Capital National Conference	PPM Manajemen	Jakarta, 3-4 November 2021
	Member of the Risk Monitoring and Nomination Committee	- BRI Agro Transformation FGD	Bank Raya	Jakarta, January 25 sd February 5, 2021
		- Webinar Fighting with HC Emerging Issues	AHCA (Advanced Human Capital Accomplished)	Jakarta, March 23, 2021
		- Human Capital National Conference Webinar	PPM Management	Jakarta, November 3-4, 2021

Pelaksanaan Tugas Komite Remunerasi dan Nominasi Responsibilities of the Remuneration and Nomination Committee

Sepanjang tahun 2021, Komite Remunerasi dan Nominasi telah menjalankan kegiatan sebagai berikut:

1. Penyusun Laporan Tahunan
2. Penyusunan Laporan Pengawasan RBB ke PSP
3. Penyusunan Laporan Pengawasan Dewan Komisaris ke OJK
4. Rapat reposisi keanggotaan Komite Remunerasi, Komite Audit dan Komite Pemantau Risiko
5. Evaluasi Remunerasi Pengurus
6. Rekomendasi Perubahan Struktur Organisasi Direktorat Digital Bisnis dan *Desk Enterprise Risk Management*
7. Penyampaian usul Calon Pengurus (Direksi dan Komisaris) Bank BRI Agroniaga
8. Pemberian Rekomendasi Pembagian sisa Saham MESOP
9. Rapat dengan Divisi HC dengan agenda pemenuhan formasi dan remunerasi pekerja
10. Pembuatan Laporan Pencapaian KPI Korporat Bulanan dan Triwulanan
11. Revisi Pedoman Kerja Komite Remunerasi dan Nominasi

The Remuneration and Nomination Committee engaged in the following activities during 2021:

1. Annual Report Compiler
2. Preparation of the RBB Supervision Report for submission to the PSP
3. Preparation of the Board of Commissioners' Supervisory Report to OJK
4. Meeting of the Remuneration Committee, the Audit Committee, and the Risk Monitoring Committee to discuss repositioning
5. Evaluation of Executive Compensation
6. Recommendations for Modifications to the Digital Business Directorate and Risk Management Desk's Organisational Structure
7. Submission of suggestions for candidates for the Bank BRI Agroniaga's management (Board of Directors and Commissioners).
8. Distribution Recommendation for the Remaining MESOP Shares
9. Meeting with the HC Division to discuss staff formation and compensation.
10. Monthly and quarterly reports on the achievement of corporate key performance indicators
11. Revision of the Guidelines for the Work of the Remuneration and Nomination Committees

Komite di Bawah Direksi Committee Under The Board of Directors

Direksi Bank Raya memiliki komite yang membantu dalam pelaksanaan tugas dan tanggung jawab dalam setiap kegiatan dan operasional Bank antara lain: Komite Manajemen Risiko, Komite ALCO, Komite Kebijakan Perkreditan, Komite Kebijakan Kredit dan Pengembangan Produk, Komite Pengarah Teknologi Informasi dan Komite Kredit.

Selain komite tersebut diatas, Direksi juga memiliki organ pendukung lainnya yaitu Sekretaris Perusahaan dan Internal Audit.

The Board of Directors of Bank Raya has committees that assist in carrying out their duties and responsibilities in each of the Bank's activities and operations, including: Risk Management Committee, ALCO Committee, Credit Policy Committee, Credit Policy and Product Development Committee, Information Technology Steering Committee and Credit Committee.

In addition to the committees mentioned above, the Board of Directors also has other supporting organs, namely the Corporate Secretary and Internal Audit.

Komite Manajemen Risiko

Risk Management Committee

Komite Manajemen Risiko dibentuk sesuai dengan Keputusan Direksi No.Kpts: B. 460/DIR.01.02/OJL/08/2021 tanggal 31 Agustus 2021 perihal Kebijakan Komite Manajemen Risiko (*Risk Management Committee*). Komite Manajemen risiko merupakan komite yang dibentuk dalam rangka menunjang efektivitas pelaksanaan proses dan sistem manajemen risiko. Komite Manajemen risiko dibutuhkan sebagai upaya agar pengelolaan seluruh risiko bisnis Bank dapat dilakukan secara sistematis terintegrasi dan berkesinambungan. Direksi menilai bahwa Komite Manajemen Risiko telah memberikan kontribusi, menjalankan tugas dan fungsinya dengan baik sesuai dengan kompetensi dan kewenangan yang dimiliki sepanjang tahun 2021.

The Risk Management Committee was formed in accordance with the Decree of the Board of Directors No. Kpts: B. 460/D IR.01.02 / O JL /08/2021 dated August 31 , 2021 Regarding the Policy of the Risk Management Committee (Risk Management Committee). The Risk Management Committee is a committee formed in order to support the effectiveness of the implementation of the risk management process and system. The Risk Management Committee is needed as an effort so that the management of all the Bank's business risks can be carried out in a systematic, integrated and sustainable manner. The Board of Directors considers that the Risk Management Committee has contributed, carried out its duties and functions properly in accordance with its competence and authority throughout 2021.

Struktur Keanggotaan

Membership Structure

Struktur Keanggotaan Komite Committee Membership Structure	
Ketua chairman	Direktur Enterprise Risk Management, Compliance & Human Resource Director of Enterprise Risk Management, Compliance & Human Resources
Sekretaris Secretary	Kepala Desk Enterprise Risk Management Head of the Enterprise Risk Management Desk
Anggota Komite	- Direktur Ritel Agri & Pendanaan - Kepala Satuan Kerja Audit Intern (SKAI) - Kepala Divisi Menengah & Non Agri - Kepala Divisi Retail Agri (<i>Crawl Up</i>) - Kepala Divisi Dana & Jasa - Kepala Divisi <i>Digital Strategy, Product & Policy</i> - Kepala Divisi <i>Digital Sales & Partnership</i> - Kepala Divisi Analisa Risiko Kredit - Kepala Divisi Restrukturisasi & Penyelamatan Kredit - Kepala Divisi Keuangan & <i>Treasury</i> - Kepala Divisi Operasional, Jaringan & Layanan - Kepala Divisi <i>Change Management</i> - Kepala Divisi Operasional Kredit - Kepala Divisi <i>Digital Operation</i> - Kepala Divisi <i>Human Capital</i> - Kepala Divisi Sekretariat Perusahaan - Kepala Divisi <i>Legal & Compliance</i> - Kepala Desk <i>Digital Portfolio Management</i>
Committee Member	- Director of Agri Retail & Funding - Head of Internal Audit Unit (SKAI) - Head of Middle & Non Agri Division - Head of Retail Agri Division (<i>Crawl Up</i>) - Head of Funds & Services Division - Head of Digital Strategy, Product & Policy Division - Head of Digital Sales & Partnership Division - Head of Credit Risk Analysis Division - Head of Credit Restructuring & Rescue Division - Head of Finance & Treasury - Head of Operations, Network & Service Division - Head of Change Management Division - Head of Credit Operations Division - Head of Digital Operations Division - Head of Human Capital Division - Head of Corporate Secretariat Divisi - Head of Legal & Compliance Division - Head of the Digital Portfolio Management Desk

Tugas dan Tanggung Jawab Duties and responsibilities

1. Memberikan rekomendasi kepada Direktur Utama dalam menyusun Kebijakan Umum Manajemen risiko bank, review kebijakan dan mengusulkan kepada Dewan Komisaris untuk mendapatkan persetujuan. 2. Memberikan rekomendasi kepada Direktur Utama dalam menyusun strategi manajemen risiko termasuk penetapan limit dan pedoman pelaksanaan manajemen risiko. 3. Melakukan penyempurnaan proses manajemen risiko secara berkala sesuai dengan perubahan kondisi eksternal, internal ataupun berdasarkan hasil evaluasi terhadap efektivitas pelaksanaan manajemen risiko yang berpengaruh terhadap kecukupan modal dan tingkat kesehatan bank. 4. Memantau, mengevaluasi dan menilai hal-hal sebagai berikut: - Perkembangan komposisi profil risiko dalam portofolio bank - Penetapan dan <i>monitoring</i> hasil pelaksanaan limit yang bersifat <i>enterprise wide</i> - Kecukupan permodalan bank terhadap <i>risk exposure</i> sesuai regulasi yang berlaku - Efektivitas pelaksanaan dan tindak lanjut perbaikan parameter yang masih berisiko - Perkembangan aspek yang menjadi tolak ukur tingkat kesehatan bank berbasis risiko yaitu rentabilitas, kecukupan permodalan dan tata kelola perusahaan yang baik 5. Penetapan hal-hal yang terkait dengan keputusan bisnis yang menyimpang dari prosedur normal (<i>irregularities</i>), antara lain pelampauan ekspansi usaha yang signifikan dibandingkan rencana bisnis Perseroan dan pengambilan posisi/eksposur risiko yang menyimpang dari limit yang ditetapkan.	1. Assist the President Director in developing the Bank's General Risk Management Policy, conduct policy reviews, and provide recommendations to the Board of Commissioners for approval. 2. Make suggestions to the President Director about risk management techniques, including the establishment of risk management boundaries and guidelines. 3. Periodically enhance the risk management process in response to changes in external and internal circumstances, or in response to the findings of an examination of the efficacy of risk management as it relates to the bank's capital adequacy and soundness. 4. Keep a close eye on, examine, and appraise the following: - Composition of risk profiles in bank portfolios - Determination and monitoring of the outcomes of enterprise-wide limit implementation - Adequacy of bank capital in relation to risk exposure, as required by relevant requirements - Efficacy of implementation and follow-up on risky parameter improvements - Establishment of criteria for risk-based bank soundness, including profitability, capital sufficiency, and sound corporate governance. 5. Determination of business actions that depart from standard operating procedures (<i>irregularities</i>), such as considerable company development outside the scope of the Company's business plan and assuming positions/risk exposures that exceed specified limitations.

Rapat Komite Committee Meeting

Sepanjang tahun 2021, Komite Manajemen Risiko melaksanakan rapat sebanyak 4 (empat) kali dengan rincian agenda dan kehadiran sebagai berikut:

Throughout 2021, the Risk Management Committee held several meetings 4 (empat) with details of the agenda and attendance as follows:

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	15 Januari 2021	- Penyampaian Laporan Tingkat Kesehatan Bank (TKB) Semester II 2020 - Penyampaian Hasil Profil Risiko Triwulan IV 2020 - Penyampaian <i>Monitoring</i> RAS Triwulan IV 2020 - Penyampaian Usulan RAS Triwulan I 2021	Dewan Direksi dan Anggota Komite
	January 15, 2021	- Submission of Bank Soundness Level Report (TKB) Semester II 2020 - Submission of the 2020 Quarter IV Risk Profile Results - Submission of Quarter IV 2020 RAS Monitoring - Submission of the First Quarter 2021 RAS Proposal	Board of Directors and Committee Members
2.	16 April 2021	- Review penilaian Tingkat Kesehatan Bank (TKB) Semester II Tahun 2020 dan Penilaian Profil Risiko Triwulan I 2021 - Penyampaian Tindak Lanjut <i>Concern</i> OJK atas <i>Self Assessment</i> Tingkat Kesehatan Bank (TKB) Semester II 2020 - Review Parameter Risiko Inherent Kredit, Likuiditas dan Operasional - Review Bobot Risiko Komposit - Penyampaian <i>Monitoring</i> Realisasi <i>Risk Appetite Statement</i> (RAS) Triwulan I 2021	Dewan Direksi dan Anggota Komite
	April 16, 2021	- Review of the assessment of the Bank Soundness Level (TKB) for the second semester of 2020 and the risk profile assessment for the first quarter of 2021 - Submission of Follow-up Concerns OJK on the Self-Assessment of Bank Soundness Level (TKB) Semester II 2020 - Review of Inherent Credit, Liquidity and Operational Risk Parameters - Composite Risk Weighting Review - Submission of Monitoring the Realization of the Risk Appetite Statement (RAS) Quarter I 2021	Board of Directors and Committee Members
3.	15 Juli 2021	- Penyampaian Hasil Penilaian Tingkat Kesehatan Bank (TKB) dan Profil Risiko Semester I 2021 - Penyampaian <i>Progress</i> Tindak Lanjut <i>Concern</i> OJK dan Dewan Komisaris BRI - Review Parameter Risiko Inherent pada Risiko Kredit, Likuiditas, Hukum, Strategik, Kepatuhan dan Aspek Rentabilitas - Penyampaian <i>Monitoring</i> Realisasi <i>Risk Appetite Statement</i> (RAS) Semester I 2021	Dewan Direksi dan Anggota Komite
	July 15, 2021	- Submission of Bank Soundness Level Assessment (TKB) and Risk Profile Semester I 2021 - Submission of Follow-up Progress Concerns OJK and the Board of Commissioners of BRI - Review of Inherent Risk Parameters on Credit Risk, Liquidity, Legal, Strategic, Compliance and Profitability Aspects - Submission of Monitoring the Realization of Risk Appetite Statement (RAS) Semester I 2021	Board of Directors and Committee Members
4.	13 Oktober 2021	- Hasil Tindak Lanjut dan Rencana Penyelesaian atau Perbaikan Angka <i>Risk Issue</i> pada RMC Triwulan II 2021 (Profil Risiko dan RAS) dari Divisi Terkait - Rencana Tindak Lanjut Perbaikan Realisasi Risiko Posisi Laporan September 2021	Dewan Direksi dan Anggota Komite
	October 13, 2021	- Results of Follow-up and Plans for Completion or Improvement of Risk Issue Numbers in RMC Quarter II 2021 (Risk Profile and RAS) from Related Divisions - Follow-up Plan for Improvement of Risk Realization Position Report September 2021	Board of Directors and Committee Members

Pelaksanaan Tugas Komite Implementation of Committee's Duties

Komite Manajemen Risiko (*Risk Management Committee*) dilaksanakan 1 (satu) kali dalam 3 (tiga) bulan untuk membahas hasil *monitoring* terhadap parameter 8 (delapan) jenis risiko, diantaranya risiko kredit, risiko pasar, risiko likuiditas, risiko operasional, risiko hukum, risiko stratejik, risiko kepatuhan dan risiko reputasi.

Komite Manajemen Risiko (*Risk Management Committee*) yang dilaksanakan pada triwulan 2 (dua) dan 4 (empat) juga membahas hasil *monitoring* terhadap penilaian tingkat kesehatan bank berbasis risiko yang meliputi aspek profil risiko, rentabilitas, permodalan dan tata kelola perusahaan yang baik/*good corporate governance*.

Rapat Komite Manajemen Risiko (*Risk Management Committee*) dihadiri sekurang-kurangnya 2/3 (dua pertiga) dari jumlah anggota yang memiliki hak suara (*vote*) dalam pengambilan keputusan Komite Manajemen Risiko (*Risk Management Committee*). Apabila kuorum tidak tercapai maka Rapat Komite Manajemen Risiko (*Risk Management Committee*) tidak dapat menghasilkan keputusan yang dianggap sah dan dijadwalkan kembali pada waktu yang mencapai kuorum rapat.

Setiap anggota Komite Manajemen Risiko (*Risk Management Committee*) yang diundang wajib hadir dalam setiap pertemuan. Apabila berhalangan hadir memberitahukan kepada Sekretaris Komite Manajemen Risiko mengenai penggantian selambatnya 1 (satu) hari sebelum rapat Komite Manajemen Risiko (*Risk Management Committee*) diadakan.

Keputusan Rapat Komite Manajemen Risiko (*Risk Management Committee*) bersifat unanimous. Keputusan Rapat Komite Manajemen Risiko (*Risk Management Committee*) dianggap sah apabila dihadiri dan diputus oleh minimal 2/3 (dua pertiga) jumlah anggota yang memiliki hak suara (*vote*) dalam pengambilan keputusan Komite Manajemen Risiko (*Risk Management Committee*).

The Risk Management Committee meets once every three months to review the results of monitoring the parameters associated with eight (eight) different types of risk, including credit risk, market risk, liquidity risk, operational risk, legal risk, strategic risk, compliance risk, and reputation risk.

Additionally, the Risk Management Committee conducted meetings in quarters 2 (two) and 4 (fourth) to examine the outcomes of monitoring the risk-based bank soundness evaluation, which covers risk profile, profitability, capital, and good corporate governance.

At least two-thirds (two-thirds) of the entire number of members with voting rights (votes) in the Risk Management Committee's decision-making attend the Risk Management Committee meeting (Risk Management Committee). If the quorum is not obtained, the Risk Management Committee Meeting is unable to make a legitimate decision and is postponed until the quorum is reached.

Each Risk Management Committee member who is invited must attend each meeting. If unable to attend, inform the Risk Management Committee's Secretary of his replacement at least one (one) day before to the Risk Management Committee meeting.

The Risk Management Committee Meetings make consensus judgments. The Risk Management Committee meeting is regarded legitimate if it is attended and determined by a minimum of 2/3 (two thirds) of the members who have voting rights in the Risk Management Committee decision-making process.

Program Kerja Tahun 2022 2022 Work Program

Berikut merupakan program kerja tahun 2022 dalam mendukung proses transformasi Bank Raya :

1. Melakukan otomatisasi pelaporan rasio *Liquidity Coverage Ratio* (LCR)
2. Melakukan *update* terhadap sistem *Risk Control Self Assessment* (RCSA) dan manajemen insiden
3. Melakukan *monitoring*, pembinaan dan sosialisasi terkait pelaksanaan strategi anti *fraud*, *Risk Control Self Assessment* (RCSA), simulasi *Business Continuity Management* (BCM)

The following is a work program for 2022 to support the transformation process of Bank Raya:

1. Automate Liquidity Coverage Ratio (LCR) reporting
2. Update the Risk Control Self Assessment (RCSA) system and incident management
3. Monitor, coach, and disseminate related to the implementation of anti-fraud strategies, Risk Control Self Assessment (RCSA), Business Continuity Management (BCM) simulations

4. Melakukan simulasi <i>Contingency Funding Plan</i> (CFP)	4. Simulate the Contingency Funding Plan (CFP)
5. Melakukan simulasi <i>Business Continuity Management</i> (BCM) <i>Switch over</i>	5. Simulation of Business Continuity Management (BCM) Switch over
6. Membuat <i>booklet risk issue</i> cabang & strategi menghadapinya	6. Create a branch risk issue booklet & strategies to deal with it
7. Melakukan <i>review Credit Risk Scoring</i> (CRS) Pinang Konsumer dan Pinang Mikro	7. Review the Credit Risk Scoring (CRS) of Pinang Consumer and Pinang Mikro
8. Melakukan <i>backtesting</i> dan <i>review Credit Risk Rating</i> (CRR) Pinang Ritel	8. Conduct backtesting and review Pinang Retail's Credit Risk Rating (CRR)
9. Melakukan <i>enhancement</i> Tingkat Kesehatan Bank (TKB) & Profil Risiko	9. Enhance the Bank Soundness Level (TKB) & Risk Profile
10. Melakukan <i>review/update Macroeconomic Value</i> (MEV), <i>Probability of Default</i> (PD) untuk PSAK 71 dan <i>backtesting</i>	10. Review/update Macroeconomic Value (MEV), Probability of Default (PD) for PSAK 71 and backtesting
11. Melakukan <i>review parameter scoring</i> dengan <i>Fintech</i>	11. Review scoring parameters with Fintech
12. Melakukan sosialisasi terkait <i>risk issue</i> cabang (Kredit) & Strategi Menghadapinya serta kaitannya dengan CRR dan <i>scoring</i>	12. Conduct socialization related to branch risk issues (Credit) & Strategies to deal with them and their relation to CRR and scoring
13. Melakukan penyusunan Rencana Aksi Keuangan Berkelanjutan (RAKB) dan laporan <i>Sustainability Report</i> (SR)	13. Prepare the Sustainable Finance Action Plan (RAKB) and Sustainability Report (SR)

Komite ALCO

ALCO Committee

Komite ALCO dibentuk sesuai dengan Keputusan Direksi Nomor B.22/DIR.01.03/DCM/10/2016 tanggal 27 Oktober 2016 perihal organisasi dan tata Kerja *Asset and Liability Committee* (ALCO) PT Bank Raya Indonesia Tbk yang masih berlaku sampai dengan saat ini.

Komite ALCO memiliki tugas dan tanggung jawab dalam pembahasan dan pengambilan keputusan strategis terkait pengelolaan produk aset dan liabilitas dengan tetap mempertimbangkan aspek pertumbuhan, kesinambungan bisnis dan profitabilitas. Direksi menilai bahwa rapat-rapat serta keputusan dari *asset Liabilities Management Committee* telah dilaksanakan dengan cukup efektif.

ALCO Committee was formed in accordance with the Decision of the Board of Directors Number B.22/DIR.01.03/DCM/10/2016 dated Oktober 27, 2016 regarding the organization and work procedure of the *Asset and Liability Committee* (ALCO) of PT Bank Raya Indonesia Tbk which is still valid today.

The ALCO Committee has duties and responsibilities in discussing and making strategic decisions related to asset and liability product management while still taking into account aspects of growth, business continuity and profitability. The Board of Directors considers that the meetings and decisions of the *Asset Liabilities Management Committee* have been carried out quite effectively.

Struktur Keanggotaan Komite ALCO

ALCO Committee Membership Structure

Struktur Keanggotaan Komite ALCO ALCO Committee Membership Structure	
Ketua chairman	Direktur Utama President Director
Ketua Pengganti I Substitute Chief I	Direktur Keuangan dan Operasional Director of Finance and Operations
Ketua Pengganti II Substitute Chief II	Direktur Bisnis Business Director
Sekretaris/Merangkap Anggota Secretary/Concurrently Member	Kepala <i>Desk treasury</i> Head of treasury desk
Anggota Tetap dengan Hak Suara	- Direktur <i>Enterprise Risk Management, Compliance & Human Resource</i> - Kepala Divisi Bisnis Menengah I - Kepala Divisi Bisnis Menengah II - Kepala Divisi Bisnis Ritel Dan Kemitraan - Kepala Divisi Dana Dan Jasa - Kepala Divisi Operasional - Kepala Divisi <i>Change Management</i> - Kepala Divisi Pengendalian Risiko Kredit - Kepala Divisi Sekretariat Perusahaan - Kepala Desk Bisnis Konsumer - Kepala Desk Manajemen Risiko
Permanent Members with Voting Rights	- Director of <i>Enterprise Risk Management, Compliance & Human Resources</i> - Head of Medium Business Division I - Head of Medium Business Division II - Head of Retail and Partnership Business Division - Head of Funds and Services Division - Head of Operations Division - Head of <i>Change Management</i> Division - Head of Credit Risk Control Division - Head of Corporate Sekretariat Divisi - Head of the Consumer Business Desk - Head of Risk Management Desk
Anggota Tetap tanpa Hak Suara	- Direktur <i>Legal, Compliance & Human Capital</i> - Kepala SKAI
Permanent Members without Voting Rights	- Director of <i>Legal, Compliance & Human Capital</i> - Head of SKAI

Tugas dan Tanggung Jawab Duties and responsibilities

1. Melakukan evaluasi kinerja keuangan perusahaan serta menetapkan strategi dan kebijakan pengelolaan aset, liabilitas dan modal yang optimum dengan memperhatikan central risk, optimum yield generation dan cost efficiency 2. Menetapkan suku bunga simpanan, suku bunga pinjaman, Fund transfer price (FTP) dan pricing lainnya yang berdampak langsung pada pencapaian net Interest Income (nii). 3. Menetapkan kewenangan pejabat pemutus dalam memutuskan suku bunga khusus simpanan, pinjaman dan/atau produk Bank Lainnya. 4. Menetapkan kebijakan Net Open Position (NOP) 5. Menentukan kebijakan hedging dan posisi Bank apabila diperlukan. 6. Memonitor bahwa pengelolaan asset dan liability di perusahaan dilaksanakan sesuai dengan hasil putusan rapat ALCO	1. Evaluating the company's financial performance as well as determining strategies and policies for optimal asset, liability and capital management by taking into account central risk, optimum yield generation and cost efficiency 2. Determining deposit interest rates, loan interest rates, Fund transfer prices (FTP) and other pricing that have a direct impact on the achievement of net interest income (nii). 3. Stipulate the authority of the decision-making officer in deciding the special interest rate for deposits, loans and/or other Bank products. 4. Set the Net Open Position (NOP) policy 5. Determine the hedging policy and the Bank's position if necessary. 6. Monitor that the management of assets and liabilities in the company is carried out in accordance with the decisions of the ALCO MEETING

Rapat Komite Committee Meeting

Sepanjang tahun 2021, Komite ALCO melangsungkan rapat sebanyak 12 kali dengan rincian agenda dan kehadiran sebagai berikut:

Throughout 2021, the ALCO Committee held several meetings 12 with details of the agenda and attendance as follows:

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	13 Januari 2021 January 13, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
2.	11 Februari 2021 February 11, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
3.	10 Maret 2021 March 10, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
4.	15 April 2021 April 15, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
5.	10 Mei 2021 May 10, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
6.	11 Juni 2021 June 11, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
7.	12 Juli 2021 July 12, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
8.	13 Agustus 2021 August 13, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
9.	11 September 2021 September 11, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
10.	12 Oktober 2021 October 12, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
11.	17 November 2021 November 17, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum
12.	15 Desember 2021 December 15, 2021	Economic Outlook, Monitoring Financial Performance, Risk Monitoring, Issues about Asset & Liability Management, Pricing Strategy.	Quorum

Pelaksanaan Tugas Komite Implementation of Committee Duties

Tugas Komite ALCO adalah sebagai berikut:

Februari

February

No.	Putusan Verdicts	PIC
1.	Akuisisi DPK USD USD TPF Acquisition	Divisi Dana Jasa Service Fund Division
2.	Eksekusi <i>Interbank Call Money</i> Interbank Call Money Execution	<i>Desk Treasury</i> Treasury Desk
3.	Melanjutkan kontraksi DPK Continuing DPK contractions	<i>Desk Treasury</i> , Divisi Dana Jasa Treasury Desk, Service Fund Division
4.	Melanjutkan inisiasi <i>review</i> untuk meningkatkan suku bunga efektif Continuing the review process to raise the effective interest rate	Divisi Bisnis Business Division
5.	Melanjutkan proses perbaikan kualitas kredit Continuing the credit quality improvement process	Divisi Bisnis, Divisi PRK Business Division, PRK Division
6.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

Maret

March

No.	Putusan Verdicts	PIC
1.	Meningkatkan suku bunga efektif yang diterima untuk restruk non covid Increasing the effective interest rate received for non-covid refunds	All Bisnis All Business
2.	Langkah-langkah penanganan NPL NPL handling steps	DBRK & PRK
3.	Mereview suku bunga restruk Covid Reviewing the interest rate for the Covid-19	All Bisnis All Business
4.	<i>Special rate</i> pinjaman Special loan rates	All Bisnis All Business
5.	<i>Monitoring</i> pembayaran bunga. - Divisi TI menyediakan <i>report</i> atas giro dan tabungan <i>special rate</i> - Monitoring interest payments. - TI Division provides reports on current accounts and special rate savings	DJS & TI DJS & IT
6.	Melanjutkan efisiensi melalui optimalisasi ratas LDR harian Continuing efficiency through optimisation of daily LDR rate	DJS
7.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

April

April

No.	Putusan Verdicts	PIC
1.	Konfirmasi ulang terkait rencana Penerbitan Obligasi Reconfirmation of the Bond Issuance plan	TRY
2.	Melakukan Akuisisi Deposito Acquisition of Deposits	DJS
3.	Membuka opsi <i>bilateral loan</i> Open bilateral loan option	TRY
4.	Akuisisi DPK DPK Acquisition	DJS
5.	Melanjutkan <i>review</i> suku bunga restru <i>Performing Loan</i> Continuing the review of Performing Loan's approved interest rate	Menengah, Ritel, Konsumer dan Digital Medium, Retail, Consumer and Digital
6.	Selektif dalam memberikan <i>special rate</i> pinjaman Being selective in providing special loan rates	Menengah, Ritel, Konsumer dan Digital Medium, Retail, Consumer and Digital
7.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

Juni

June

No.	Putusan Verdicts	PIC
1.	Melanjutkan penurunan rasio Depositor Inti Continuing decrease in Core Depositor ratio	DJS, OJL
2.	Perbaikan <i>Maturity Gap</i> Maturity Gap Fix	FTR.DJS.OJL & MR
3.	Komitmen terhadap penetapan alokasi OHC Commitment to setting OHC allocations	CMG
4.	Menjaga PDN mendekati <i>square</i> Keeping PDN close to square	FTR, PRK. Bisnis Menengah & Non Agri FTR, PRK. Medium & Non Agri Business
5.	Melanjutkan ratas LDR Continuing LDR	FTR & DJS
6.	Pengelolaan likuiditas Liquidity management	FTR, PRK. Bisnis Menengah & Non Agri FTR, PRK. Medium & Non Agri Business
7.	Perbaikan Kinerja Juni 2021 Performance Improvements June 2021	FTR DJS AH
8.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

Juli

July

No.	Putusan Verdicts	PIC
1.	Menjaga ratas harian LDR Maintaining daily average LDR	FTR, DJS Bisnis FTR. Business DJS
2.	Penurunan DPK Decrease in TPF	DJS
3.	Penyesuaian target pendapatan <i>extracomtable</i> Extracomtable revenue target adjustment	Divisi Bisnis. PRK Business Division. PRK
4.	Pengawasan Portofolio Valas LDR LDR FX Portfolio Oversight	FTR & DJS
5.	Melanjutkan penurunan rasio Depositor Inti Continuing decrease in Core Depositor ratio	DJS, OJL
6.	Target Penurunan COF COF Reduction Target	DJS
7.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

Oktober

October

No.	Putusan Verdicts	PIC
1.	Rasio Konsentrasi Concentration Ratio	DJS
2.	Laba Rugi par Segmen Profit and Loss par Segment	SLR
3.	Likuiditas Valas Forex Liquidity	DJS
4.	Roadmap Penurunan DPK DPK Reduction Roadmap	DJS
5.	Proyeksi <i>Balance</i> Balance Projection	KTR
6.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

November

November

No.	Putusan Verdicts	PIC
1.	Rasio Melanjutkan Penurunan Rasio Konsentrasi Depositor Inti Ratio Continuing Decrease Core Depositor Concentration Ratio	DJS
2.	Proyeksi Penyesuaian DPK TPF Adjustment Projection	DJS
3.	Pricing Tabungan Savings Pricing	DSP
4.	Pricing FTP Rupiah Pricing FTP Rupiah	

No.	Putusan Verdicts	PIC
5.	Pricing Pinjaman Pinang Pinang Loan Pricing	SLP
6.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

Desember

December

No.	Putusan Verdicts	PIC
1.	Melanjutkan target <i>roadmap</i> penurunan rasio Deposan inti Continuing the roadmap target of reducing the core depositor ratio	DJS
2.	Perbaikan <i>Maturity Gap</i> Maturity Gap Fix	KTR
3.	Penyesuaian DPK TPF adjustment	DJS
4.	Pengelolaan PDN NOP Management	KTR
5.	Likuiditas valas Forex liquidity	DJS
6.	Pricing Pinjaman Program Pinang Ritel Retail Pinang Program Loan Pricing	KTR
7.	Penetapan Suku bunga simpanan dan kredit Determination of interest rates on deposits and loans	

Program Kerja Tahun 2022 2022 Work Program

- Pengelolaan *balance sheet* dengan memperhatikan *central risk*, *optimum yield generation* dan *cost efficiency*
- Melakukan penetapan suku bunga simpanan, suku bunga pinjaman, *Fund Transfer Price* (FTP) dan pricing lainnya yang berdampak langsung pada pencapaian *Net Interest Income* (NII).
- Melakukan pengelolaan untuk pemenuhan ketentuan regulator
- Pengelolaan risiko Likuiditas dan risiko Pasar
- Menetapkan kebijakan *Net Open Position* (NOP)
- Memonitor bahwa pengelolaan *asset* dan *liability* di perusahaan dilaksanakan sesuai dengan hasil putusan Rapat ALCO
- Balance sheet management by taking into account central risk, optimum yield generation and cost efficiency
- Determine deposit interest rates, loan interest rates, Fund Transfer Prices (FTP) and other pricing that have a direct impact on the achievement of Net Interest Income (NII).
- Carry out management for compliance with regulatory provisions
- Liquidity risk and Market risk management
- Establish a Net Open Position (NOP) policy
- Monitor that the management of assets and liabilities in the company is carried out in accordance with the decisions of the ALCO Meeting

Komite Kebijakan Perkreditan

Credit Policy Committee

Komite Kebijakan Perkreditan dibentuk sesuai dengan Keputusan No. Kpts B.20/Dir.01.02/OPK/01/2022 tanggal 20 Januari 2022 tentang SK Komite Kebijakan Perkreditan

The Credit Policy Committee was formed in accordance with Decree No. Kpts B./Dir.01.02/OPK/01/2022 dated January 20, 2022 concerning the Credit Policy Committee (KKP).

Komite Kebijakan Perkreditan dibentuk untuk membantu Direksi dalam hal:

1. Memberikan masukan kepada Direksi dalam rangka penyusunan KPB
2. Mengawasi agar KPB Bank Raya diterapkan dan dilaksanakan secara konsekuen dan konsisten
3. Memberikan rekomendasi terhadap hambatan atau kendala dalam penerapan KPB
4. Melakukan kajian berkala terhadap KPB

The Credit Policy Committee was formed to assist the Board of Directors in:

1. Provide input to the Board of Directors in the context of preparing the KPB
2. Supervise that Bank Raya KPB is implemented and implemented consistently and consistently
3. Provide recommendations on obstacles or obstacles in the implementation of CDE
4. Conduct periodic reviews of KPB

Struktur Keanggotaan

Membership Structure

Struktur Keanggotaan Komite Kebijakan Perkreditan Credit Policy Committee Membership Structure	
Ketua chairman	Direktur Utama President director
Sekretaris Secretary	Kepala Bagian Kebijakan Kredit Dan Operasional Head of Credit Policy and Operations
Anggota	- Direktur Digital Bisnis - Direktur Retail Agri & Pendanaan - Direktur Keuangan dan Operasional - SEVP Credit Risk - Divisi Bisnis Menengah & Non Agri - Divisi Digital, Strategy, Product & Policy - Divisi Bisnis Ritel Agri (Crawl Up) - Divisi Analisa Risiko Kredit - Divisi Restrukturisasi & Penyelamatan Kredit - Divisi Change Management - Divisi Digital Operation - Desk Enterprise Risk Management
Member	- Director of Digital Business - Director of Retail Agri & Funding - Director of Finance and Operations - SEVP Credit Risk - Medium & Non Agri Business Division - Digital, Strategy, Product & Policy Division - Agri Retail Business Division (Crawl Up) - Credit Risk Analysis Division - Credit Restructuring & Rescue Division - Change Management Division - Digital Operations Division - Enterprise Risk Management Desk

Tugas dan Tanggung Jawab Duties and responsibilities

1. Memberi masukan kepada Direksi dalam rangka penyusunan KPB Bank terutama yang berkaitan dengan perumusan prinsip kehati-hatian dalam perkreditan.
 2. Mengawasi agar KPB Bank diterapkan dan dilaksanakan secara konsekuen dan konsisten serta sesuai dengan ketentuan hukum yang berlaku.
 3. Memberikan rekomendasi terhadap hambatan atau kendala dalam penerapan KPB Bank.
 4. Melakukan kajian berkala terhadap KPB Bank dan memberikan rekomendasi (masukan/pendapat/saran) kepada Direksi apabila diperlukan adanya perubahan atau perbaikan terhadap KPB Bank.
 5. Pengambilan keputusan-keputusan lain yang terkait dengan kebijakan perkreditan.
1. Provide input to the Board of Directors in the context of preparing the Bank's KPB, especially those related to the formulation of prudential principles in credit.
 2. Supervise that the Bank's KPB is implemented and implemented in a consistent and consistent manner and in accordance with applicable legal provisions.
 3. Provide recommendations on obstacles or obstacles in the implementation of KPB Banks.
 4. Conduct periodic reviews of the Bank's KPB and provide recommendations (input/opinion/suggestion) to the Board of Directors if changes or improvements are needed to the Bank's KPB.
 5. Making other decisions related to credit policy.

Rapat Komite Committee Meeting

Sepanjang tahun 2021, Komite Kebijakan Perkreditan tidak melaksanakan rapat, karena pada tahun 2021 tidak ada perubahan KPB Bank Raya.

Throughout 2021, the Credit Policy Committee did not hold meetings, because in 2021 there was no change in Bank Raya's KPB.

Pelaksanaan Tugas Komite Committee Duties Pelaksanaan

Tahun 2021 pelaksanaan KKP Bank Raya tidak dilaksanakan dikarenakan belum adanya perubahan dan pelaksanaan *review* berkala baru akan dilakukan pada tahun 2022.

In 2021, the implementation of the Bank Raya KKP will not be carried out because there have been no changes and the implementation of periodic reviews will only be carried out in 2022.

Program Kerja Tahun 2022 2022 Work Program

Program kerja KKP tahun 2022 adalah untuk melakukan *review* dan revisi KPB Bank Raya, antara lain :

1. Mendukung transformasi Bank Raya dengan *review* KPB Bank Raya dengan arah bisnis Bank Raya 2022
 2. Melakukan revisi KPB 2022 untuk menyesuaikan dengan organisasi Bank Raya terbaru
 3. *Review* Kebijakan Perkreditan Bank di tahun 2022 dengan aturan eksternal yang berlaku.
- The work program of KKP in 2022 is to review and revise Bank Raya KPB, including:
1. Support the transformation of Bank Raya with a review of Bank Raya's KPB with the business direction of Bank Raya 2022
 2. Revise the 2022 KPB to suit the latest Bank Raya organization
 3. Review of Bank Credit Policy in 2022 with applicable external regulations.

Komite Kebijakan Kredit dan Pengembangan Produk

Credit Policy and Product Development Committee

Komite Kebijakan Kredit dan Pengembangan Produk adalah komite di Kantor pusat yang membantu Direksi dalam merumuskan kebijakan kredit dan pengembangan produk, baik pinjaman maupun simpanan, mengawasi pelaksanaan kebijakan, serta memberikan saran langkah-langkah perbaikan.

The Credit Policy and Product Development Committee is a committee at the head office that assists the Board of Directors in formulating credit policies and product development, both loans and deposits, overseeing the implementation of policies, and providing suggestions for improvement.

Komite Kebijakan Kredit dan Pengembangan Produk dibentuk berdasarkan Surat Keputusan Direksi, terakhir diubah berdasarkan Surat Keputusan Direksi No. Kpts: B.40/DIR.01.05/DCM/XI/2017 tanggal 30 November 2017 tentang Komite Kebijakan Kredit dan pengembangan produk. Komite Kebijakan-Kebijakan Kredit dan pengembangan produk dibentuk untuk membantu Direksi dalam hal:

The Credit Policy and Product Development Committee was established based on the Decree of the Board of Directors, the last amendment was based on the Decree of the Board of Directors No. Kpts: B.40/DIR.01.05/DCM/XI/2017 dated November 30, 2017 regarding the Credit Policy Committee and product development. The Credit Policy and Product Development Policy Committee was formed to assist the Board of Directors in:

1. Mengusulkan dan menetapkan kebijakan dan/atau perubahan kebijakan kredit atau produk di Bank Raya yang bersifat strategis
2. Menyusun dan menetapkan PS dan KRD Bank Raya
3. Mengusulkan pembuatan ketentuan produk kredit yang akan dipasarkan dan menguntungkan Bank Raya
4. Memberikan rekomendasi terhadap hambatan atau kendala dalam penerapan kebijakan kredit di Bank Raya.

Struktur Keanggotaan

Membership Structure

Struktur Keanggotaan Komite Committee Membership Structure	
Ketua chairman	Direktur Utama President director
Sekretaris Secretary	Kepala Bagian Kebijakan Kredit Dan Operasional Head of Credit Policy and Operations
Anggota	- Direktur Bisnis - Direktur Risk Management - Direktur Keuangan dan Operasional - Divisi Bisnis Menengah - Divisi Bisnis Ritel Dan Kemitraan - Desk Bisnis Konsumer - Divisi Pengendalian Risiko Kredit - Divisi Legal & Compliance - Divisi Change Management - Satuan Kerja Audit Intern
Member	- Business Director - Director of Risk Management - Director of Finance and Operations - Medium Business Division - Retail and Partnership Business Division - Consumer Business Desk - Credit Risk Control Division - Legal & Compliance Division - Change Management Division - Internal Audit Unit

Tugas dan Tanggung Jawab Duties and responsibilities

Komite Kebijakan Kredit dan pengembangan produk bertugas membantu Direksi Bank untuk merumuskan kebijakan kredit dan pengembangan produk, mengawasi pelaksanaan kebijakan, serta memberikan saran-saran langkah perbaikan.

The Credit Policy and Product Development Committee is tasked with assisting the Bank's Board of Directors in formulating credit policies and product development, overseeing the implementation of policies, and providing suggestions for improvement.

Rapat Komite Committee Meeting

Sepanjang tahun 2021, Komite Kebijakan Kredit dan pengembangan produk melangsungkan rapat sebanyak 11 (sebelas) kali dengan rincian agenda dan kehadiran sebagai berikut:

Throughout 2021, the Credit Policy and Product Development Committee held 11 (eleven) meetings with details of the agenda and attendance as follows:

No.	Tanggal Rapat Meeting Date	Agenda Rapat Meeting agenda	Peserta Rapat Meeting participants
1.	Sirkuler Circular	SK Pedoman Pelaksanaan Kredit (PPK) Ritel Revisi Pertama Decree of the First Revised Retail Credit Implementation Guidelines (PPK)	
2.	Sirkuler Circular	SE Perlakuan Khusus Terhadap Kredit Debitur Terdampak COVID-19 SE Special Treatment for Credit Debtors Affected by COVID-19	
3.	Sirkuler Circular	SE Ketentuan Kredit Ritel Agri (CRAWL UP) SE Agri Retail Credit Terms (CRAWL UP)	
4.	Sirkuler Circular	SE Pembelian Agunan Yang Diambil Alih (AYDA) Revisi Pertama SE Purchase of Foreclosed Collateral (AYDA) First Revision	
5.	Sirkuler Circular	SK Segmentasi Bisnis BRI AGRO Decree of BRI AGRO's Business Segmentation	
6.	Sirkuler Circular	SE Hapus Buku SE Delete Book	
7.	Sirkuler Circular	SE Kredit Usaha Rakyat (KUR) Revisi Pertama SE People's Business Credit (KUR) First Revision	
8.	Sirkuler Circular	SK Pedoman Penyaluran Kredit Melalui Penyelenggara Layanan Pinjam Meminjam Uang Berbasis Teknologi (Fintech) Decree of Guidelines for Credit Distribution Through Technology-Based Borrowing-Lending Service Providers (Fintech)	
9.	Sirkuler Circular	SE Revisi Ketiga Kredit Berbasis Aplikasi SE Third Revision of Application-Based Credit	
10.	Sirkuler Circular	SK Pedoman Pelaksanaan Kredit Mikro Decree of Guidelines for the Implementation of Micro Credit	
11.	Sirkuler Circular	SE Ketentuan Penyaluran Kredit Mikro Berbasis Aplikasi SE Terms of Application-Based Microcredit Distribution	

Pelaksanaan Tugas Komite Implementation of Committee Duties

Sepanjang tahun 2021, Komite Kebijakan Kredit dan Pengembangan Produk telah melaksanakan kegiatan sebagai berikut:

Throughout 2021, the Credit Policy and Product Development Committee has carried out the following activities:

1. Mengusulkan dan menetapkan kebijakan dan/atau perubahan kebijakan kredit atau produk di Bank Raya yang bersifat strategis
2. Menyusun dan menetapkan PS dan KRD Bank Raya
3. Mengusulkan pembuatan ketentuan produk kredit yang akan dipasarkan dan menguntungkan Bank Raya
4. Memberikan rekomendasi terhadap hambatan atau kendala dalam penerapan kebijakan kredit di Bank Raya.

1. Propose and determine policies and/or changes to strategic credit or product policies at Bank Raya
2. Develop and determine PS and KRD Bank Raya
3. Propose the making of provisions for credit products that will be marketed and benefit Bank Raya
4. Provide recommendations on obstacles or obstacles in the application of credit policies at Bank Raya.

Program Kerja Tahun 2022 2022 Work Program

Tahun 2022, Komite Kebijakan Kredit dan Pengembangan Produk akan Melakukan *review* dan revisi terhadap ketentuan dibawah ini:

In 2022, the Credit Policy and Product Development Committee will review and revise the following provisions:

No.	Ketentuan Provision
1.	SE Pinang Ritel (Pinang) SE Areca Retail (Areca)
2.	Revisi SE Penyelesaian Kredit Revision of SE Credit Settlement
3.	SE Kredit Konsumtif Berbasis Aplikasi (Pinang) SE Application-Based Consumer Credit (Pinang)
4.	Revisi SK AYDA Revised SK AYDA
5.	SK LPG (PS-KRD) SK LPG (PS-KRD)
6.	Revisi SE Penghapusbukuan (OJK) Revised Write-off SE (OJK)
7.	SK PPK Menengah Medium PPK Decree
8.	SK PPK Ritel Retail PPK Decree
9.	SK PPK Konsumer Consumer PPK Decree
10.	SK PPK Treasury SK PPK Treasury
11.	Revisi SE Restrukturisasi Restructuring SE Revision
12.	Review SE Lelang Agunan SE Collateral Auction Review
13.	SK PPK Fintech SK PPK Fintech
14.	Relaksasi Penyerahan laporan Keuangan Relaxation of Financial Report Submission
15.	Review Pinang Connect (Digital) Pinang Connect (Digital) Review
16.	Review Pinang Rakyat E2E Review of Areca Rakyat E2E
17.	Pinang Connect-Kriteria > 1 M Pinang Connect-Criteria > 1 M

Komite Pengarah Teknologi Informasi

Information Technology Steering Committee

Komite pengarah teknologi informasi dibentuk sesuai dengan keputusan Direksi Nomor 19/DIR.01.05/TSI/III/2013 tanggal 28 Maret 2013, perihal revisi ketiga komite pengarah teknologi sistem informasi, susunan komite pengarah teknologi informasi Perseroan.

The information technology steering committee was formed in accordance with the decision of the Board of Directors Number 19/DIR.01.05 /TSI / III /2013 dated 28 March 2013, regarding the third revision of the information systems technology steering committee, the composition of the Company's information technology steering committee.

Komite pengarah TI adalah komite tertinggi dalam penyelenggaraan teknologi informasi yang bertugas memberikan rekomendasi serta membantu direksi dan dewan komisaris dalam memantau kegiatan penyelenggaraan dan kesiapan infrastruktur teknologi informasi. Pelaksanaan tugas komite pengarah teknologi informasi telah sesuai dengan rencana kerja yang telah ditetapkan dan sangat mendukung implementasi teknologi informasi di Perseroan.

The IT steering committee is the highest committee in the implementation of information technology, which is tasked with providing recommendations and assisting the board of directors and commissioners in monitoring the implementation and readiness of information technology infrastructure. The implementation of the duties of the information technology steering committee has been in accordance with the work plan that has been set and strongly supports the implementation of information technology in the Company.

Struktur Keanggotaan

Membership Structure

Struktur Keanggotaan Komite Pengarah TI IT Steering Committee Membership Structure	
Ketua I Chief I	Direktur Utama President Director
Ketua II Chairman II	Direktur Keuangan dan Operasional Director of Finance and Operations
Ketua III Chief III	Direktur Digital Bisnis Director of Digital Business
Ketua IV Chief IV	Direktur Enterprise Risk Director of Enterprise Risk
Sekretaris Secretary	Kepala Divisi Teknologi Informasi Head of Information Technology Division
Anggota Tetap	- Senior Executive Vice President Credit Risk - Kepala Divisi Operasional Jaringan dan Layanan - Kepala Divisi Keuangan & Treasury - Kepala Divisi Analisa Risiko Kredit - Kepala Divisi Bisnis Menengah & Non Agri - Kepala Divisi Legal & Compliance - Kepala Satuan Kerja Audit Intern (SKAI) - Kepala Divisi Sekretariat Perusahaan - Kepala Divisi Change Management - Kepala Divisi Restrukturisasi & Penyelamatan Kredit - Kepala Divisi Digital Strategy, Product & Policy - Kepala Divisi Digital Sales & Partnership - Kepala Divisi Ritel Agri (Crawl Up) - Kepala Divisi Dana & Jasa - Kepala Divisi Teknologi Informasi - Kepala Divisi Human Capital
Permanent Members	- Senior Executive Vice President Credit Risk - Head of Operations Network and Services Division - Head of Finance & Treasury Division - Head of Credit Risk Analysis Division - Head of Medium Business & Non-Agri Division - Head of Legal & Compliance Division - Head Unit Internal Audit Work (SKAI) - Head of Corporate Secretariat Division - Head of Change Management Division - Head of Restructuring & Credit Rescue Division - Head of Digital Strategy, Product & Policy Division - Head of Digital Sales & Partnership Division - Head of Agri Retail Division (Crawl Up) - Head of Funds & Services Division - Head of Information Technology Division - Head of Human Capital Division

Tugas dan Tanggung Jawab Duties and Responsibilities

Tugas dan tanggung jawab Komite Pengarah Teknologi Sistem Informasi (KPTSI) adalah sebagai berikut:

Komite Pengarah Teknologi Informasi bertanggung jawab memberikan rekomendasi kepada Direksi paling sedikit terkait dengan:

- a. Rencana Strategis Teknologi Informasi yang sejalan dengan rencana strategis kegiatan usaha Bank Raya. Dalam memberikan rekomendasi, Komite Pengarah TI harus memperhatikan faktor efisiensi, efektivitas, dan hal-hal lain yaitu:
 - 1) Peta jalan (*road-map*) untuk mencapai kebutuhan TI yang mendukung strategis bisnis Bank. Peta jalan (*road-map*) terdiri dari kondisi saat ini (*current state*), kondisi yang ingin dicapai (*future state*), dan langkah-langkah yang akan dilakukan untuk mencapai kondisi yang ingin dicapai;
 - 2) Sumber data yang dibutuhkan;
 - 3) Manfaat yang akan diperoleh saat Rencana Strategis TI diterapkan; dan
 - 4) Kendala yang mungkin timbul dalam penerapan Rencana Strategis TI.
- b. Perumusan kebijakan, standar, dan prosedur Teknologi Informasi yang utama;
- c. Kesesuaian antara proyek teknologi Informasi yang disetujui dengan rencana Strategis teknologi Informasi;
- d. Kesesuaian antara pelaksanaan proyek teknologi Informasi dengan rencana proyek yang disepakati (*project charter*);
- e. Kesesuaian antara teknologi Informasi dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank Raya;
- f. Efektivitas langkah-langkah dalam meminimalkan risiko atas investasi Bank Raya pada sektor teknologi Informasi agar investasi Bank pada sektor teknologi Informasi memberikan kontribusi terhadap pencapaian tujuan bisnis Bank Raya;
- g. Pemantauan atas kinerja teknologi Informasi dan upaya peningkatan kinerja teknologi Informasi;
- h. Upaya penyelesaian berbagai masalah terkait teknologi Informasi, yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara teknologi Informasi secara efektif, efisien dan tepat waktu;
- i. Kecukupan dan alokasi sumber daya yang dimiliki Bank.

The Information Systems Technology Steering Committee (KPTSI) has the following roles and responsibilities:

A group called the Information Technology Steering Committee is responsible to the Board of Directors for making recommendations on at least the following:

- a. Information Technology Strategic Plan that is consistent with Bank Raya's business strategy When making suggestions, the IT Steering Committee must think about how efficient and effective they are, as well as other factors, like the following:
 - 1) Roadmap for achieving IT requirements that support the bank's business objectives. The road map comprises the present state, the desired conditions (future state), and the procedures necessary to achieve the desired circumstances;
 - 2) Data sources that are required;
 - 3) The benefits that will accrue as a result of the IT Strategic Plan's implementation; and
 - 4) Potential impediments to putting the IT Strategic Plan into action.
- b. Creation of important IT policies, standards, and processes;
- c. Adherence of the approved information technology project to the approved information technology strategic plan;
- d. Adherence to the agreed-upon project plan (project charter);
- e. The needs of Bank Raya's business activities and the needs of information technology and the management information system must match up.
- f. Bank Raya's investment in information technology must be a success in order for the bank's investment to help it meet its business goals. F.
- g. Keeping an eye on the performance of information technology and making efforts to improve it;
- h. Attempts to solve different problems with information technology that can't be solved by the group of people who use and organise information technology.
- i. Sufficiency and distribution of the bank's resources

Rapat Komite Committee Meeting

Pada tahun 2021, Komite Pengarah TI melaksanakan rapat pada tanggal 4 November dengan agenda pembahasan mengenai *Strategic Initiatives* sepanjang tahun 2021. Terdapat 42 peserta rapat yang hadir baik secara *online* maupun *offline*.

In 2021, the IT Steering Committee met on November 4 to discuss Strategic Initiatives for the remainder of the year. There were 42 meeting attendees, both online and in-person.

Pelaksanaan Tugas Komite Implementation of Committee Duties

1. Memberikan arahan dan rekomendasi akan pelaksanaan *strategic inisiatif* yang dijalankan di divisi teknologi informasi.
2. Mendorong pelaksanaan rencana *strategic inisiatif* dengan tetap menjaga aspek *governance* dalam pelaksanaan kegiatannya.
3. Memonitor pelaksanaan tata kelola yang sudah dijalankan

1. Provide direction and recommendations for the implementation of strategic initiatives carried out in the information technology division.
2. Encouraging the implementation of strategic initiative plans while maintaining the governance aspect in the implementation of its activities.
3. Monitor the implementation of governance that has been implemented

Program Kerja Tahun 2022 2022 Work Program

Rencana kerja TI Bank Raya berdasarkan Revisi ITMP 2020-2024, adalah sebagai berikut:

Melakukan aktivitas pembuatan arsitektur:

1. Arsitektur Data
2. Arsitektur Aplikasi
3. Arsitektur Jaringan
4. Arsitektur Server & Storage
5. Arsitektur DC/DRC
6. Arsitektur Client/User Device
7. Arsitektur Security & Incident Response
8. Arsitektur Tata Kelola TI
9. Arsitektur Organisasi TI

Project SI TSI 2022

1. Big Data & Business Intelligence Implementation
2. Virtual Private Cloud
3. Fraud Detection System
4. Payment Gateway Platform Implementation
5. Data Center Enhancement

Bank Raya's IT work plan based on the Revised ITMP 2020-2024, is as follows:

Carry out architectural creation activities:

1. Data Architecture
2. Application Architecture
3. Network Architecture
4. Server & Storage Architecture
5. DC/DRC Architecture
6. Client/User Device Architecture
7. Security & Incident Response Architecture
8. IT Governance Architecture
9. IT Organization Architecture

Project SI TSI 2022

1. Big Data & Business Intelligence Implementation
2. Virtual Private Cloud
3. Fraud Detection System
4. Payment Gateway Platform Implementation
5. Data Center Enhancement

Komite Kredit

Credit Committee

Komite Kredit dibentuk sesuai dengan Keputusan Direksi nomor B.325/DIR.01.02/OPK/07/2021 tanggal 27 Juli 2021 perihal Komite Kredit PT Bank Raya Indonesia Tbk. Komite Kredit bertugas membantu Direksi dalam mengevaluasi dan atau memutuskan permohonan kredit untuk jumlah dan atau jenis kredit tertentu yang ditetapkan oleh Direksi.

The Credit Committee was established in accordance with the Decision of the Board of Directors number B.325/DIR.01.02/OPK/07/2021 dated July 27, 2021 regarding the Credit Committee of PT Bank Raya Indonesia Tbk. The Credit Committee is tasked with assisting the Board of Directors in evaluating and or deciding credit applications for certain amounts and or types of credit determined by the Board of Directors.

Struktur Keanggotaan

Membership Structure

Struktur Keanggotaan Komite Committee Membership Structure	Anggota Member
Komite Kredit Utama	- Direktur Utama - Direktur Bisnis Retail & Pendanaan - Direktur Digital Bisnis - Direktur Keuangan dan Operasional - SEVP <i>Credit Risk</i>
Main Credit Committee	- President Director - Director of Retail Business & Funding - Director of Digital Business - Director of Finance and Operations - SEVP <i>Credit Risk</i>
Komite Kredit I	- Direktur Bisnis Retail & Pendanaan - Direktur Digital Bisnis - Direktur Operasional & Keuangan - SEVP <i>Credit Risk</i>
Credit Committee I	- Director of Retail Business & Funding - Director of Digital Business - Director of Operations & Finance - SEVP <i>Credit Risk</i>
Komite Kredit II	- Direktur Bisnis Retail & Pendanaan - SEVP <i>Credit Risk</i>
Credit Committee II	- Director of Retail Business & Funding - SEVP <i>Credit Risk</i>
Komite Kredit III	- Kepala Divisi Analisa Risiko Kredit - Kepala Divisi RAC
Credit Committee III	- Head of Credit Risk Analysis Division - Head of RAC Division

Tugas dan Tanggung Jawab Duties and Responsibilities

1. Tugas Komite Kredit:

- Memberikan persetujuan atau penolakan kredit sesuai dengan batas wewenang yang ditetapkan oleh Direksi.
- Melakukan koordinasi dengan *Assets and Liabilities Committee* (ALCO) dalam aspek pendanaan untuk kredit dengan jumlah tertentu yang ditetapkan oleh ALCO.

2. Tanggung Jawab Komite Kredit:

- Melaksanakan tugas dalam pemberian putusan kredit berdasarkan kemahiran profesional secara jujur, objektif, cermat dan seksama.
- Menolak permintaan dan atau pengaruh pihak-pihak yang berkepentingan untuk memberikan persetujuan kredit yang hanya bersifat formalitas.
- Membubuhkan tanda tangan pada formulir putusan Kredit sebagai bukti pemberian putusan Kredit sebagai wujud tanggung jawab Komite Kredit. Oleh karena itu, sebelum membubuhkan tanda tangan, Komite Kredit harus :
 - ✓ Memastikan bahwa setiap kredit yang diberikan telah memenuhi ketentuan perbankan dan sesuai asas-asas perkreditan yang sehat.
 - ✓ Memastikan bahwa pelaksanaan pemberian kredit telah sesuai dengan KUP - Bank Raya, PPK Bisnis dan Ketentuan yang berlaku di Bank Raya serta perkreditan lainnya.
 - ✓ Memastikan bahwa pemberian kredit telah didasarkan pada penilaian yang jujur, objektif, cermat dan seksama serta terlepas dari pengaruh pihak-pihak yang berkepentingan dengan pemohon kredit.

1. Credit Committee Duties:

- Give approval or rejection of credit in accordance with the limits of authority set by the Board of Directors.
- Coordinate with the Assets and Liabilities Committee (ALCO) in the aspect of funding for credit with a certain amount determined by ALCO.

2. Responsibilities of the Credit Committee:

- Carry out duties in granting credit decisions based on professional skills in an honest, objective, thorough and thorough manner.
- Refuse requests and or the influence of interested parties to provide credit approval which is only a formality.
- Put a signature on the Credit decision form as evidence of the granting of the Credit decision as a form of responsibility of the Credit Committee. Therefore, before signing, the Credit Committee must:
 - ✓ Ensuring that every loan granted has complied with banking regulations and in accordance with sound credit principles.
 - ✓ Ensuring that the implementation of lending is in accordance with the KUP - Bank Raya, Business PPK and applicable provisions at Bank Raya as well as other loans.
 - ✓ Ensure that the granting of credit is based on an honest, objective, careful and thorough assessment and is independent of the influence of parties with an interest in credit applicants.

Rapat Komite Committee Meeting

Sepanjang tahun 2021, Komite Kredit melangsungkan rapat sebanyak 61 kali dengan rincian sebagai berikut:

KK Utama sebanyak	: 29
KK I sebanyak	: 12
KK II sebanyak	: 13
KK III sebanyak	: 7

Throughout 2021, the Credit Committee held 61 (sixty one) meetings, including 29 (twenty nine) meetings of the Main Credit Committee, 12 (twelve) meetings of the Credit Committee I, and 13 meetings of the Credit Committee II. Credit Committee III met 13 (thirteen) times and 7 (seven) times, with a quorum of members present.

Pelaksanaan Tugas Komite Kredit

Implementation of Credit Committee Duties

- √ Memastikan bahwa setiap kredit yang diberikan telah memenuhi ketentuan perbankan dan sesuai asas-asas perkreditan yang sehat.
- √ Memastikan bahwa pelaksanaan pemberian kredit telah sesuai dengan Ketentuan yang berlaku di Bank Raya serta perkreditan lainnya.
- √ Memastikan bahwa pemberian kredit telah didasarkan pada penilaian yang jujur, objektif, cermat dan seksama serta terlepas dari pengaruh pihak-pihak yang berkepentingan dengan pemohon kredit.
- √ Ensuring that every loan granted has complied with banking regulations and in accordance with sound credit principles.
- √ Ensuring that the implementation of lending is in accordance with the applicable provisions at Bank Raya and other loans.
- √ Ensuring that the granting of credit is based on an honest, objective, careful and thorough assessment and is independent of the influence of parties with an interest in credit applicants.

Program Kerja Tahun 2022

2022 Work Program

Melaksanakan komite kredit untuk memberikan persetujuan atau penolakan kredit sesuai dengan batas wewenang yang ditetapkan.

Implement a credit committee to provide credit approval or rejection in accordance with the stipulated authority limits.

Sekretaris Perusahaan Corporate Secretary

Sekretaris Perusahaan merupakan pihak penghubung (*Compliance Officer*) yang menjembatani kepentingan antara Bank Raya dengan pihak eksternal, terutama dalam menjaga persepsi publik atas citra Bank. Sebagai salah satu organ pendukung, Sekretaris perusahaan berperan penting dalam membantu Bank memenuhi peraturan pasar modal, yaitu dengan menyediakan pedoman kepada Dewan Komisaris dan Direksi mengenai seperti GCG, Anggaran Dasar Bank, dan peraturan perundang-undangan yang berlaku.

Sekretaris perusahaan Bank berfungsi sebagai penghubung antara Bank dengan lembaga/instansi terkait, otoritas pasar modal, komunitas pemodal, dan masyarakat umum. Sekretaris perusahaan bertanggung jawab menyediakan dan menyampaikan informasi kepada masyarakat umum maupun untuk kepentingan investor yang berhubungan dengan kinerja Bank secara tepat waktu, akurat dan transparan sesuai ketentuan dan perundang-undangan yang berlaku bagi bank maupun bagi perusahaan publik.

Persyaratan dan tata cara pengangkatan Sekretaris perusahaan mengacu pada peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2014 tentang Sekretaris perusahaan emiten atau perusahaan publik.

Pembentukan, pengangkatan, dan pelaksanaan fungsi serta tugas Sekretaris perusahaan mengacu pada Surat Keputusan Direksi PT Bursa Efek Indonesia No. Kep 00001/BEI/01-2014 perihal perubahan peraturan Nomor I-a: tentang pencatatan Saham dan efek Bersifat ekuitas Selain Saham yang Diterbitkan oleh perusahaan tercatat.

The Corporate Secretary is the liaison officer (*Compliance Officer*) who bridges the interests between Bank Raya and external parties, especially in maintaining public perception of the Bank's image. As one of the supporting organs, the Corporate Secretary plays an important role in helping the Bank comply with capital market regulations, namely by providing guidelines to the Board of Commissioners and Directors regarding such as GCG, the Bank's Articles of Association, and applicable laws and regulations.

The Bank's corporate secretary functions as a liaison between the Bank and related institutions/agencies, capital market authorities, the investor community, and the general public. The Corporate Secretary is responsible for providing and conveying information to the general public as well as for the benefit of investors related to the Bank's performance in a timely, accurate and transparent manner in accordance with the provisions and laws that apply to banks and public companies.

The requirements and procedures for the appointment of the Corporate Secretary refer to the Regulation of the Financial Services Authority no. 35/POJK.04/2014 concerning Corporate Secretary of issuers or public companies.

The formation, appointment, and implementation of the functions and duties of the Corporate Secretary refers to the Decree of the Board of Directors of PT Bursa Efek Indonesia No. Kep 00001/BEI/01-2014 concerning amendments to regulation Number Ia: concerning the listing of Shares and Equity Securities Other than Shares Issued by a listed company.

Pihak yang Mengangkat dan Memberhentikan Sekretaris Perusahaan The Party that Appoints and Dismisses the Corporate Secretary

Sekretaris perusahaan bertanggung jawab langsung kepada Direksi serta diangkat dan diberhentikan berdasarkan Keputusan Direksi berdasarkan mekanisme internal Bank. Pengangkatan Sekretaris perusahaan dengan mempertimbangkan kemampuan profesional serta integritasnya di masyarakat dan bisnis.

The corporate secretary is directly responsible to the Board of Directors and is appointed and dismissed based on the Decree of the Board of Directors based on the Bank's internal mechanisms. Appointment of Corporate Secretary by considering his professional ability and integrity in society and business.

Struktur Organisasi Sekretaris Perusahaan Corporate Secretary Organizational Structure

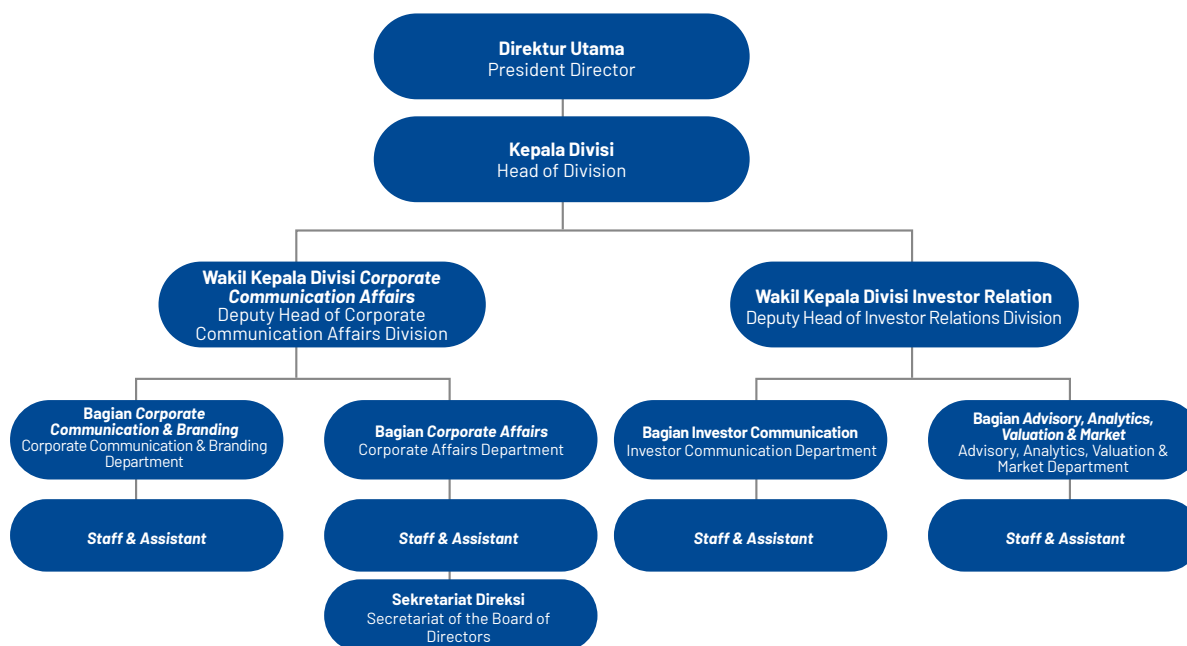
Struktur Organisasi Divisi Sekretariat Perusahaan berdasarkan Surat Keputusan No. Kpts. 498/Dir.01.02/CMG/09/2021 tentang Penetapan Kembali Struktur Organisasi Divisi Sekretariat Perusahaan. Kepala Divisi Sekretariat Perusahaan dibantu oleh Wakil Kepala Divisi yang membawahi Bidang *Corporate Communications & Affairs* dan Bidang *Investor Relation*, yang masing-masing membawahi fungsi sebagai berikut:

The Organizational Structure of the Corporate Secretariat Division based on Decree No. Kpts. 498/Dir.01.02/CMG/09/2021 concerning Re-determination of the Organizational Structure of the Corporate Secretariat Division. The Head of the Corporate Secretariat Division is assisted by a Deputy Division Head in charge of Corporate Communications & Affairs and Investor Relations, each of which oversees the following functions:

1. Wakil Kepala Divisi <i>Corporate Communication & Affairs</i> 1.1 Kepala Bagian <i>Corporate Communication & Branding</i> yang membawahi: 1.1.1 Staf <i>Corporate Communication & CSR</i> 1.1.2 Staf <i>Corporate Branding</i> 1.1.3 Pelaksana 1.2 Kepala Bagian <i>Corporate Affairs</i> yang membawahi: 1.2.1 Staf <i>Corporate Affairs</i> 1.2.2 Pelaksana <i>Corporate Affairs</i> 1.2.3 Sekretariat Direksi 2. Wakil Kepala Divisi <i>Investor Relation</i> 2.1 Kepala Bagian <i>Investor Communication</i> yang membawahi: 2.1.1 Staf <i>Investor Communication</i> 2.1.2 Pelaksana <i>Investor Communication</i> 2.2 Kepala Bagian <i>Advisory, Analytics, Valuation & Market</i> 2.2.1 Staf <i>Advisory, Analytics, Valuation & Market</i> 2.2.2 Pelaksana <i>Advisory, Analytics, Valuation & Market</i>	1. Deputy Head of Corporate Communication & Affairs 1.1 Head of Corporate Communication & Branding who oversees: 1.1.1 Corporate Communication & CSR Staff 1.1.2 Corporate Branding Staff 1.1.3 Executor 1.2 Head of Corporate Affairs who is in charge of: 1.2.1 Corporate Affairs Staff 1.2.2 Implementing Corporate Affairs 1.2.3 Secretariat of the Board of Directors 2. Deputy Head of Investor Relations Division 2.1 Head of Investor Communication Division in charge of: 2.1.1 Investor Communication Staff 2.1.2 Implementing Investor Communication 2.2 Head of Advisory, Analytics, Valuation & Market 2.2.1 Advisory, Analytic, Valuation & Market Staf Staff 2.2.2 Advisory, Analytics, Valuation & Market

Berikut bagan struktur organisasi Divisi Sekretaris perusahaan:

The following is a chart of the organisational structure of the Corporate Secretary Division:



Profil Sekretaris Perusahaan Corporate Secretary Profile

Sekretaris Perusahaan PT Bank Raya Indonesia Tbk dijabat oleh Hirawan Nur Kustono. Profil lengkap beliau dapat dilihat pada bagian profil pejabat eksekutif di bab Profil Perusahaan dalam buku Laporan Tahunan ini.

The Corporate Secretary of PT Bank Raya Indonesia Tbk is held by Hirawan Nur Kustono. His full profile can be seen in the executive officer profile section in the Company Profile chapter in this Annual Report.

Tugas dan Tanggung Jawab Duties and responsibilities

Mengacu pada pasal 5 peraturan Otoritas Jasa Keuangan Nomor 35/POJK.04/2014 tentang Sekretaris perusahaan emiten atau perusahaan publik, fungsi Sekretaris perusahaan adalah melaksanakan tugas paling kurang meliputi:

1. Mengikuti perkembangan pasar modal khususnya peraturan perundangan yang berlaku di bidang pasar modal.
2. Memberikan masukan kepada Direksi dan Dewan Komisaris untuk mematuhi ketentuan peraturan perundangan di bidang pasar modal.
3. Membantu Direksi dan Dewan Komisaris dalam pelaksanaan tata kelola perusahaan yang meliputi:
 - Keterbukaan informasi kepada masyarakat, termasuk ketersediaan informasi pada Situs Web emiten;
 - Penyampaian laporan kepada Otoritas Jasa Keuangan tepat waktu;
 - Penyelenggaraan dan dokumentasi Rapat Umum Pemegang Saham;
 - Penyelenggaraan dan dokumentasi rapat Direksi dan/atau Dewan Komisaris; dan
 - Pelaksanaan program orientasi terhadap perusahaan bagi Direksi dan/atau Dewan Komisaris.
4. Sebagai penghubung antara emiten dengan Pemegang Saham, OJK dan pemangku kepentingan lainnya.

Referring to article 5 of the Financial Services Authority Regulation Number 35/POJK.04/2014 concerning Corporate Secretary of issuers or public companies, the function of the Corporate Secretary is to carry out duties that at least include:

1. Keeping abreast of capital market developments, especially the prevailing laws and regulations in the capital market sector.
2. Providing input to the Board of Directors and the Board of Commissioners to comply with the provisions of the laws and regulations in the capital market sector.
3. Assisting the Board of Directors and the Board of Commissioners in the implementation of corporate governance which includes:
 - Information disclosure to the public, including the availability of information on the Issuer's Website;
 - Timely submission of reports to the Financial Services Authority;
 - Organising and documenting the General Meeting of Shareholders;
 - Organising and documenting meetings of the Board of Directors and/or Board of Commissioners; and
 - Implementation of the company orientation program for the Board of Directors and/or the Board of Commissioners.
4. As a liaison between issuers and shareholders, OJK and other stakeholders.

Fungsi Investor Relations Investor Relations Function

Bank senantiasa membangun citra yang baik melalui pengembangan hubungan dengan investor/analisis, baik secara interaktif maupun penyampaian informasi secara berkala, terutama terkait kinerja Bank. Penyampaian informasi dilakukan melalui kegiatan *analyst meeting* dan media komunikasi lainnya, termasuk situs web Bank dengan alamat www.bankraya.co.id.

Fungsi utama Investor relations adalah untuk membina hubungan baik dan berinteraksi dengan investor, pasar modal, dan Pemegang Saham, yang meliputi:

1. Pengembangan strategi komunikasi terutama terkait investor, calon investor potensial, analisis, *fund manager*, dan masyarakat pasar modal secara umum.
2. Penyusunan materi presentasi kinerja keuangan triwulanan, pelaksanaan *analyst meeting*, dan telekonferensi.
3. Komunikasi kinerja Bank kepada pihak eksternal seperti investor, *fund manager*, dan calon investor potensial.
4. Menjaga hubungan baik dengan investor, *fund manager*, analisis, dan lembaga pemeringkat.

The Bank continues to build a good image through developing relationships with investors/analysts, both interactively and regularly delivering information, especially regarding the Bank's performance. Information is conveyed through analyst meetings and other communication media, including the Bank's website at www.bankraya.co.id.

The main function of Investor relations is to maintain good relations and interact with investors, capital markets, and shareholders, which include:

1. Development of communication strategies, especially related to investors, potential investors, analysts, fund managers, and the capital market community in general.
2. Preparation of quarterly financial performance presentation materials, implementation of analyst meetings, and teleconferences.
3. Communication of the Bank's performance to external parties such as investors, fund managers, and potential investors.
4. Maintain good relations with investors, fund managers, analysts, and rating agencies.

Program Peningkatan Kompetensi Competency Improvement Program

No.	Pelatihan Training	Tanggal Date	Penyelenggara Organizer	Tempat The place
1.	Pendalaman tentang POJK No. 3/POJK.04/2021 tentang Penyelenggaraan Kegiatan di Bidang Pasar Modal Exploration of POJK No. 3/POJK.04/2021 concerning the Implementation of Activities in the Capital Market Sector	23 Juni 2021 June 23, 2021	Indonesia Corporate Secretary Association	Online
2.	Stock Split, Dividen Saham, Saham Bonus dan Buyback Saham Stock Split, Stock Dividend, Bonus Stock and Stock Buyback	19 Agustus 2021 August 19, 2021	Indonesia Corporate Secretary Association	Online
3.	Advance Valuation	30 Agustus-12 Desember 2021 August 30-December 12 2021	NYU Executive	Online

Pelaksanaan Tugas Sekretaris Perusahaan Implementation of the Duties of the Corporate Secretary

Tahun 2021, Sekretaris Perusahaan Bank Raya telah melaksanakan tugas dan tanggung jawabnya dengan rincian sebagai berikut:

1. Aktivitas Bank sebagai Perusahaan Terbuka:
 - a. Melaksanakan Keterbukaan Informasi kepada masyarakat secara elektronik melalui Sistem Pelaporan Elektronik dan IDXnet maupun non elektronik, termasuk pelaporan-pelaporan kepada Regulator sehubungan status Bank sebagai perusahaan terbuka yang menjadi kewenangan unit kerja Sekretariat Perusahaan Menyelenggarakan dan mendokumentasikan Rapat Umum Pemegang Saham
 - b. Menyelenggarakan kegiatan-kegiatannya lainnya yang berkaitan dengan Aksi Korporasi dan/atau keterbukaan informasi lainnya.
 - c. Membuat Materi Presentasi Materi ALCO untuk *update* perkembangan Harga Saham dan Makro Ekonomi.
 - d. Menyusun Laporan Tahunan Tahun Buku 2020 serta menyampaikannya kepada Regulator terkait.
 - e. Melaksanakan fungsi kepatuhan Bank terhadap peraturan-peraturan di bidang pasar modal.
2. Aktivitas Komunikasi Korporasi
 - a. Menetapkan kebijakan dan strategi komunikasi Korporasi Dalam melaksanakan tugasnya, Divisi Sekretariat Perusahaan perlu melakukan *update* kebijakan agar dapat mengikuti ketentuan dan perkembangan terkini.
 - b. Melakukan aktivitas komunikasi yang bersifat korporasi kepada pemangku kepentingan internal maupun eksternal

In 2021, the Corporate Secretary of Bank Raya has carried out his duties and responsibilities with the following details:

1. Activities of the Bank as a Public Company:
 - a. Implementing Disclosure of Information to the public electronically through the Electronic Reporting System and IDXnet as well as non-electronic, including reports to Regulators regarding the Bank's status as a public company under the authority of the Corporate Secretariat work unit Organizing and documenting the General Meeting of Shareholders
 - b. Organising other activities related to Corporate Actions and/or other information disclosure.
 - c. Making ALCO Material Presentation Materials to update the development of Stock Prices and Macroeconomics.
 - d. Preparing the 2020 Fiscal Year Annual Report and submit it to the relevant Regulators.
 - e. Carrying out the Bank's compliance function with regulations in the capital market sector.
2. Corporate Communication Activities
 - a. Establishing Corporate communication policies and strategies
In carrying out its duties, the Corporate Secretariat Division needs to update policies in order to keep up with the latest regulations and developments.
 - b. Carrying out corporate communication activities to internal and external stakeholders

- 1) Melaksanakan pemberitaan dan iklan di media massa termasuk media *online*. Bank Raya mengeluarkan Siaran Pers untuk menginformasikan berbagai kegiatan yang dijalankan, baik yang terkait dengan kinerja Bank maupun kegiatan lainnya.
- 2) Melaksanakan tindakan antisipatif dan korektif atas setiap pemberitaan dan iklan di media massa termasuk media *online*.
- 3) Mendukung unit-unit kerja terkait dalam penyelesaian keluhan nasabah.
- 4) Melaksanakan pengelolaan Website Bank bersama-sama dengan Unit Kerja terkait.
- 5) Melaksanakan fungsi pengelolaan risiko yang meliputi proses identifikasi, pengukuran, pemantauan dan pengendalian manajemen risiko reputasi.
- c. Mengadakan dan melaksanakan kegiatan tertentu (*event/acara/sponsorship*) sebagai pelaksanaan strategi komunikasi yang bersifat korporasi serta pengelolaan reputasi/risiko reputasi.
- d. Meliput aktivitas kegiatan seremonial korporasi.
3. Aktivitas Kesekretariatan
 - a. Menyelenggarakan dan mendokumentasikan Rapat Direksi dan Rapat Dewan Komisaris.
 - b. Mengadministrasikan dokumen perusahaan termasuk mengatur atau menetapkan peraturan tentang persurutan dan pengelolaan dokumen Perusahaan termasuk mendistribusikan seluruh surat masuk yang ditujukan kepada Perseroan atau Unit Kerja terkait untuk ditindaklanjuti.
 - c. Melaksanakan kegiatan-kegiatan untuk mendukung fungsi dan kegiatan kerja Dewan Komisaris dan Direksi.
 - d. Melaksanakan kegiatan pengamanan dan pengawalan/protokol Direksi dan Dewan Komisaris di kantor/tempat dinas, perjalanan/acara dan kediaman.
4. Aktivitas *Corporate Social Responsibility* (CSR)

Melaksanakan kegiatan baik yang merupakan pelaksanaan program Rencana Aksi Keuangan Berkelanjutan (RAKB) maupun dengan bekerjasama dengan pihak ketiga seperti Program Pemberdayaan Masyarakat melalui Desa Digital dan pemberian sumbangan atau donasi sehubungan dengan bencana alam.

- 1) Carrying out news and advertisements in the mass media, including online media. Bank Raya issues Press Releases to inform various activities carried out, both related to the Bank's performance and other activities.
- 2) Implementing anticipatory and corrective actions on every news and advertisement in the mass media, including online media.
- 3) Supporting relevant work units in resolving customer complaints.
- 4) Carrying out the management of the Bank's Website together with the related Work Units.
- 5) Carrying out risk management functions which include the process of identification, measurement, monitoring and control of reputation risk management.
- c. Organising and Carrying out certain activities (*events/sponsorship*) as the implementation of corporate communication strategies as well as reputation/reputation risk management.
- d. Covering corporate ceremonial activities.
3. Secretarial Activities
 - a. Organising and documenting Board of Directors Meetings and Board of Commissioners Meetings.
 - b. Administering company documents including regulating or stipulating regulations regarding corporate correspondence and document management including distributing all incoming letters addressed to the Company or related Work Units for follow-up.
 - c. Carrying out activities to support the functions and work activities of the Board of Commissioners and the Board of Directors.
 - d. Carrying out security and escort activities/protocol of the Board of Directors and the Board of Commissioners at the office/office place, travel/event and residence.
4. Corporate Social Responsibility (CSR) Activities

Carrying out activities that are either the implementation of the Sustainable Finance Action Plan (RAKB) program or in collaboration with third parties such as the Community Empowerment Program through Digital Villages and the provision of donations or donations in connection with natural disasters.

Fungsi Kepatuhan Compliance Function

Dengan semakin meningkatnya kompleksitas kegiatan usaha Bank sejalan dengan perkembangan teknologi, globalisasi dan integrasi pasar keuangan, Bank dihadapkan pada penambahan eksposur risiko sehingga diperlukan upaya yang bersifat preventif (*ex ante*) maupun kuratif (*ex-post*) untuk memitigasi risiko tersebut.

Peran dan fungsi kepatuhan dalam perbankan adalah memastikan eksposur risiko dalam kegiatan usaha Bank dapat ditekan dengan berbagai cara tindakan yang bersifat preventif (*ex-ante*). Merujuk pada Peraturan OJK No. 46/POJK.03/2017 tentang pelaksanaan Fungsi Kepatuhan Bank Umum, disebutkan bahwa fungsi kepatuhan meliputi tindakan untuk:

- Mewujudkan terlaksananya Budaya Kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank;
- Mengelola risiko Kepatuhan yang dihadapi oleh Bank;
- Memastikan agar kebijakan, ketentuan, sistem dan prosedur serta kegiatan usaha yang dilakukan oleh Bank sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; dan
- Memastikan kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada OJK dan/atau otoritas pengawas lain yang berwenang.

With the increasing complexity of the Bank's business activities in line with technological developments, globalization and integration of financial markets, the Bank is faced with increasing risk exposure so that preventive (*ex ante*) and curative (*ex-post*) measures are needed to mitigate these risks.

The role and function of compliance in banking is to ensure that risk exposure in the Bank's business activities can be reduced through various preventive actions (*ex-ante*). Referring to OJK Regulation No. 46/POJK.03/2017 concerning the implementation of the Compliance Function of Commercial Banks, it is stated that the compliance function includes actions to:

- Realising the implementation of a Compliance Culture at all levels of the Bank's organization and business activities;
- Managing the Compliance risk faced by the Bank;
- Ensuring that the policies, provisions, systems and procedures as well as the business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority and the provisions of laws and regulations; and
- Ensuring the Bank's compliance with the commitments made by the Bank to the OJK and/or other competent supervisory authorities.

Pedoman Operasional Kepatuhan Compliance Operational Guidelines

Bank Raya telah mempunyai pedoman operasional Kepatuhan sebagaimana diatur dalam Surat Edaran Direksi No. SE.B.40/DIR.02.04/OJL/LCA/11/2021 tanggal 22 November 2021 dan dalam pelaksanaan salah satu tugas dan tanggung jawabnya, Bagian Kepatuhan melakukan pengujian prinsip kehati-hatian terhadap putusan Kredit dan non Kredit, rencana Kebijakan Kredit dan non Kredit serta rencana perjanjian Kerjasama yang ditandatangani Direksi yang dalam pelaksanaannya berpedoman pada Surat edaran Direksi No Se : B.44/DIR.01.02/KRH/04/2019 tanggal 30 April 2019 tentang pengujian prinsip Kehati-hatian terhadap rencana Kebijakan dan atau Keputusan Direksi Serta pemantauan tindak Lanjut Hasil pengujian oleh Direktur Kepatuhan PT Bank Raya Indonesia Tbk (revisi Kedua).

Bank Raya already has a Compliance operational guideline as stipulated in the Circular Letter of the Board of Directors No. SE.B.40/DIR.02.04/OJL/LCA/11/2021 dated 22 November 2021 and in carrying out one of its duties and responsibilities, the Compliance Division tests the precautionary principle. Pay attention to Credit and non-Credit decisions, Credit and non-Credit Policy plans and Cooperation agreement plans signed by the Board of Directors which in its implementation is guided by the Circular Letter of the Board of Directors No. Se : B.44/DIR.01.02/KRH /04/2019 dated April 30, 2019 concerning testing the principle of Prudence on the Policy plan and or the Decision of the Board of Directors as well as monitoring the follow-up of the test results by the Compliance Director of PT Bank Raya Indonesia Tbk (Second revision).

Struktur Organisasi Kepatuhan Compliance Organisational Structure

Fungsi Kepatuhan perseroan dilaksanakan oleh Direktur *Enterprise Risk Management, Compliance & Human Resource* yang membawahi *Desk Enterprise Risk Management, Divisi Legal & Compliance* dan *Divisi Human Resource* sebagai struktur organisasi satuan kerja kepatuhan sesuai dengan surat keputusan direksi no.Kpts.B.269/DIR.04.02/CMG/06/2021 tanggal 14 Juni 2021 tentang Penetapan Kembali Struktur Organisasi *Divisi Legal & Compliance* tentang organisasi *Divisi Legal & Compliance* yang strukturnya dapat digambarkan sebagai berikut:

The Director of Enterprise Risk Management, Compliance, and Human Resources is responsible for the Company's compliance function. He or she oversees the Enterprise Risk Management Desk, the Legal & Compliance Division, and the Human Resource Division, which comprise the compliance work unit's organisational structure in line with the Board of Directors' decision letter no.Kpts.B.269/DIR. 04.02/CMG/06/2021 dated June 14, 2021 concerning Re-determination of the Organisational Structure of the Legal & Compliance Division regarding the organisation of the Legal & Compliance Division whose structure can be summarised as follows:



Tugas dan Tanggung Jawab Satuan Kerja Kepatuhan

Duties and Responsibilities of the Compliance Unit

Dalam melaksanakan Fungsi Kepatuhan, tugas dan tanggung jawab Satuan Kerja Kepatuhan wajib paling sedikit :

1. Membuat langkah untuk mendukung terciptanya Budaya Kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi;
2. Melakukan identifikasi, pengukuran, pemantauan dan pengendalian terhadap risiko Kepatuhan dengan mengacu pada ketentuan OJK yang mengatur mengenai penerapan manajemen risiko bagi bank umum;
3. Menilai dan mengevaluasi efektivitas, kecukupan dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan.
4. Melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan OJK dan ketentuan peraturan perundang-undangan;
5. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur serta kegiatan usaha Bank telah sesuai dengan ketentuan OJK dan ketentuan peraturan perundang-undangan.

In carrying out the Compliance Function, the duties and responsibilities of the Compliance Work Unit must at least:

1. Take steps to support the creation of a Compliance Culture in all Bank business activities at every level of the organization;
2. Identify, measure, monitor and control Compliance risk with reference to the OJK REGULATIONS governing the implementation of risk management for commercial banks;
3. Assess and evaluate the effectiveness, adequacy and conformity of policies, provisions, systems and procedures owned by the Bank with the provisions of laws and regulations.
4. Review and/or recommend updating and improving the policies, provisions, systems and procedures of the Bank to comply with the provisions of the OJK and the provisions of laws and regulations;
5. Make efforts to ensure that the policies, provisions, systems and procedures as well as the Bank's business activities are in accordance with the provisions of the OJK and statutory provisions.

Prinsip Kepatuhan Compliance Principle

Pelaksanaan Fungsi Kepatuhan Bank mengacu pada POJK Nomor 46/POJK.03/2017 tentang Fungsi Kepatuhan Bank Umum yaitu mengelola langkah-langkah yang bersifat *ex-ante* (preventif) untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha yang dilakukan oleh Bank telah sesuai dengan ketentuan regulator dan peraturan perundang-undangan yang berlaku, serta memastikan kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan dan/atau otoritas pengawas lain yang berwenang.

The implementation of the Bank's Compliance Function refers to POJK Number 46/POJK.03/2017 concerning the Compliance Function of Commercial Banks, namely managing *ex-ante* (preventive) measures to ensure that policies, provisions, systems and procedures, as well as business activities carried out by the Bank in accordance with the provisions of the regulator and the applicable laws and regulations, as well as ensuring the Bank's compliance with the commitments made by the Bank to the Financial Services Authority and/or other competent supervisory authorities.

Rencana Kerja Satuan Kerja Kepatuhan Compliance Work Unit

1. Re-sosialisasi mengenai budaya kepatuhan, penerapan tata Kelola perusahaan yang Baik/*Good Corporate Governance*, Kode etik dan pengendalian Gratifikasi dan *e-learning*;
2. Pelaksanaan Audit Surveillance ISO 37001:2016 Sistem Manajemen Anti Penyuapan;
3. Pengkinian Kebijakan Internal yang diterbitkan oleh Bagian *Compliance* ;
4. Pemantauan secara komprehensif terhadap tindak lanjut pengujian prinsip kehati-hatian dan pengkinian terhadap seluruh kebijakan internal bank disesuaikan dengan kebijakan eksternal yang berlaku;
5. Digitalisasi dokumen pengujian prinsip Kehati-hatian (Uji Kepatuhan);
6. Pelaksanaan Audit Surveillance ISO 9001:2015 Sistem Manajemen Mutu.

Pelaksanaan Tugas Divisi *legal & Compliance* terkait dengan pelaksanaan Fungsi Kepatuhan :

1. Sosialisasi dan penerapan Kode etik, Budaya Kepatuhan dan pengendalian Gratifikasi telah diberikan kepada sebagian besar pekerja di semua level, baik di Kantor pusat maupun di Kantor Cabang/Kantor Cabang pembantu/Kantor Kas.
2. *Monitoring* Kebijakan internal dan eksternal telah dilakukan dengan sosialisasi ketentuan eksternal yang baru melalui penyampaian *resume* yang disampaikan ke seluruh unit kerja dan penyampaian dampak dari adanya ketentuan eksternal tersebut melalui penyusunan analisa dampak yang disampaikan kepada *user* terkait
3. *Review* Kebijakan bidang Kepatuhan telah dilakukan dengan melakukan pengkinian kebijakan Buku pedoman operasional.

1. Re-socialisation regarding compliance culture, implementation of Good Corporate Governance, Code of ethics and Gratification control and *e-learning*;
2. Implementation of the ISO 37001:2016 Surveillance Audit Anti-Bribery Management System;
3. Internal Policy Updates issued by Compliance;
4. Comprehensive monitoring of follow-up testing of prudential principles and updating of all bank internal policies in accordance with applicable external policies;
5. Digitisation of the Prudential principle testing document (Compliance Test);
6. Implementation of ISO 9001:2015 Quality Management System Surveillance Audit.

Implementation of the Legal & Compliance Division's Duties related to the implementation of the Compliance Function:

1. Dissemination and implementation of the Code of Ethics, Compliance Culture and Gratification control have been provided to most workers at all levels, both at the Head Office and at Branch Offices/Sub-Branch Offices/Cash Offices.
2. Monitoring of internal and external policies has been carried out by socializing the new external regulations through the submission of resumes that are submitted to all work units and delivery of the impact of these external provisions through the preparation of impact analysis submitted to the relevant users
3. The Compliance Policy Review has been carried out by updating the Operational Manual policy.

Satuan Kerja Audit Intern

Internal Audit Work Unit

Satuan Kerja audit Intern (SKAI) sebagai salah satu pihak yang berkepentingan dengan Sistem pengendalian Intern Bank turut berperan aktif dalam meningkatkan efektivitas Sistem pengendalian Intern secara berkesinambungan. SKAI berperan dalam memberikan keyakinan berdasarkan hasil pemeriksaan bahwa pengendalian internal dan pelaksanaan kegiatan operasional, akuntansi, manajemen risiko dan kegiatan Bank lainnya telah terselenggara dengan baik dan mampu menjamin kepentingan Bank serta *stakeholder*.

Untuk itu, pelaksanaan audit intern harus didukung oleh tenaga auditor yang independen dan berkompeten, khususnya dalam praktik dan penerapan penilaian risiko dengan jumlah tenaga auditor yang memadai. Pada tahun personil SKAI telah menjalani sertifikasi auditor dengan harapan SKAI dapat terus meningkatkan kapabilitas fungsi audit intern berikut kompetensi baik *technical* maupun *behavior*. Selain itu, setiap awal tahun juga diselenggarakan *workshop* SKAI untuk mengoptimalkan peran dan fungsi sebagai auditor.

The Internal Audit Unit (SKAI) as one of the parties with an interest in the Bank's Internal Control System plays an active role in increasing the effectiveness of the Internal Control System on an ongoing basis. SKAI plays a role in providing assurance based on the results of the examination that internal control and the implementation of operational activities, accounting, risk management and other Bank activities have been implemented properly and are able to guarantee the interests of the Bank and stakeholders.

For this reason, the implementation of the internal audit must be supported by an independent and competent auditor, particularly in the practice and application of risk assessment with an adequate number of auditors. In 2016, SKAI personnel have undergone auditor certification with the hope that SKAI can continue to improve the capability of the internal audit function as well as competence both technical and behavioral. In addition, at the beginning of every year an SKAI workshop is also held to optimise the role and function as an auditor.

Piagam Audit Internal

Internal Audit Charter

Piagam audit Internal merupakan pedoman tata laksana kerja internal audit perseroan yang memuat visi dan misi, fungsi dan ruang lingkup kerja, tanggung jawab, kewenangan, akuntabilitas, independensi, dan kode etik dari SKAI. Piagam audit Internal ditinjau dan diperbarui secara berkala sesuai kebutuhan organisasi. Piagam audit Internal telah di *review* ulang berdasarkan SK Direksi No. Kpts.r.78/DIR.01.02/SKAI/05/2019 tanggal 31 Mei 2019 tentang piagam audit Intern PT Bank Raya Indonesia Tbk sebagai revisi dari Surat Keputusan No.Kpts.B.38/DIR.01.02/SKAI/01/tanggal 29 Januari 2016 tentang revisi piagam audit. Piagam audit Internal mengatur pelaksanaan audit serta pedoman untuk memastikan:

1. Risiko telah diidentifikasi dan dikelola secara tepat.
2. Interaksi dengan berbagai grup *governance* telah berjalan dengan baik.
3. Informasi penting mengenai keuangan, manajerial dan operasional adalah akurat, dapat dipercaya dan tepat waktu.
4. Tindakan pekerja sesuai dengan kebijakan, hukum dan peraturan yang berlaku.
5. Sumber daya diperoleh secara ekonomis dan digunakan secara efisien serta diproteksi dengan memadai.
6. Program, rencana dan sasaran tercapai dengan baik.
7. Kualitas dan perbaikan berkesinambungan telah melekat di dalam proses pengendalian Bank Raya.
8. Peraturan perundang-undangan yang berpengaruh secara signifikan terhadap Bank Raya, diketahui dan dipatuhi secara tepat.
9. Kesempatan untuk memperbaiki pengendalian manajemen, keuntungan, dan reputasi Bank Raya, diidentifikasi dan diungkapkan dalam pemeriksaan.

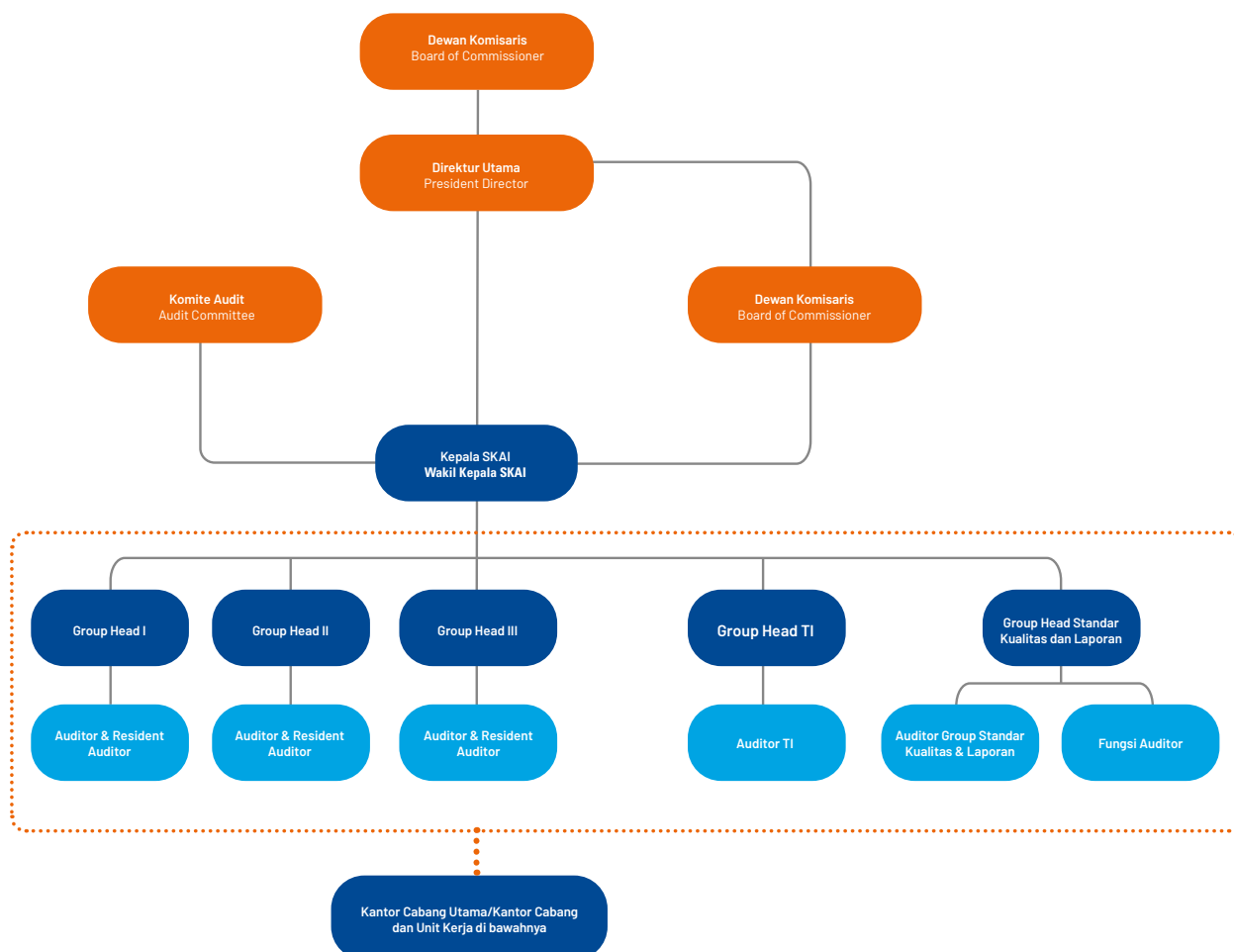
The Internal audit charter is a guideline for the company's internal audit work management which contains the vision and mission, functions and scope of work, responsibilities, authorities, accountability, independence, and the SKAI code of ethics. The Internal audit charter is reviewed and updated regularly according to the needs of the organization. The Internal audit charter has been reviewed based on the Decree of the Board of Directors No.Kpts.r.78/DIR.01.02/SKAI/05/2019 dated May 31, 2019 regarding the internal audit charter of PT Bank Raya Indonesia Tbk as a revision of the Decree No.Kpts.B. 38/DIR.01.02/SKAI/01/dated January 29, 2016 regarding the revision of the audit charter. The Internal audit charter regulates the conduct of the audit as well as guidelines to ensure:

1. Risks have been identified and managed appropriately.
2. Interaction with various governance groups has been going well.
3. Important financial, managerial and operational information is accurate, reliable and timely.
4. Worker's actions are in accordance with applicable policies, laws and regulations.
5. Resources are obtained economically and used efficiently and adequately protected.
6. Programs, plans and targets are well achieved.
7. Quality and continuous improvement have been embedded in Bank Raya's control process.
8. Legislation that has a significant effect on Bank Raya, is known and complied with appropriately.
9. Opportunities to improve management control, profitability and reputation of Bank Raya, are identified and disclosed in the audit.

Struktur Organisasi Audit Internal Internal Audit Organisation Structure

Dalam susunan struktur organisasi Bank Raya, SKAI bertanggung jawab langsung kepada Direktur Utama serta dapat berkomunikasi langsung dengan Komite audit dan Dewan Komisaris dalam berkoordinasi akan hal-hal yang terkait dengan pelaksanaan dan hasil audit. Sebagaimana ditetapkan dalam Surat Keputusan Direksi Nomor SK Direksi No. Kpts. B.32/DIR.01.03/CMG/06/2020 tanggal 23 Juni 2020. Tentang penetapan organisasi Satuan Kerja audit Intern dengan bagan sebagai berikut:

In the organisational structure of Bank Raya, SKAI is directly responsible to the President Director and can communicate directly with the audit committee and the Board of Commissioners in coordinating matters related to the implementation and results of the audit. As stipulated in the Decree of the Board of Directors No. Decree of the Board of Directors No. Kpts. B.32/DIR.01.03/CMG/06/2020 dated June 23, 2020. Regarding the determination of the organization of the Internal Audit Work Unit with the following chart:



Jumlah Pegawai dan Sertifikasi Number of Employees and Certification

No.	Jabatan Position	Sertifikasi Certification	Jumlah Pekerja The number of workers
1.	Kepala SKAI Head of SKAI	QIA dan CFrA	1
2.	Group Head Group Head	CAFM	1
3.	RA, Auditor, GH, Wakil Kepala SKAI, Kepala SKAI RA, Auditor, GH, Deputy Head of SKAI, Head of SKAI	BSMR	20

Pihak Yang Mengangkat Dan Memberhentikan Kepala Satuan Kerja Audit Internal The Party Who Appoints and Dismisses the Head of the Internal Audit Unit

Kepala SKAI diangkat dan diberhentikan oleh Direktur Utama dengan persetujuan Dewan Komisaris dan/atau Komite Audit, selanjutnya dilaporkan ke Bank Indonesia/Otoritas Jasa Keuangan.

The Head of SKAI is appointed and dismissed by the President Director with the approval of the Board of Commissioners and/or the Audit Committee, then reported to Bank Indonesia/Financial Services Authority.

Profil Kepala Satuan Kerja Audit Internal Profile of the Head of the Internal Audit Unit

Profil Anshari Assadiqi sebagai Kepala Satuan Pengawasan Internal dapat dilihat pada bab Profil Perusahaan dalam buku Laporan Tahunan ini.

Anshari Assadiqi's profile as the Head of the Internal Control Unit can be seen in the Company Profile chapter in this Annual Report.

Tugas dan Tanggung Jawab Duties and responsibilities

Sesuai dengan yang tercantum pada piagam audit Internal, tugas dan tanggung jawab SKAI Bank Raya adalah sebagai berikut:

1. Satuan Kerja audit Intern bertanggung jawab langsung kepada Direktur Utama
2. Membantu tugas Direktur Utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan maupun pemantauan hasil audit.
3. Membuat analisis dan penilaian di bidang keuangan, akuntansi, operasional dan kegiatan lainnya melalui pemeriksaan langsung dan pengawasan secara tidak langsung.
4. Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana.

In accordance with what is stated in the Internal audit charter, the duties and responsibilities of Bank Raya SKAI are as follows:

1. The Internal Audit Unit is directly responsible to the President Director
2. Assist the duties of the President Director and the Board of Commissioners in supervising by explaining operationally the planning, implementation and monitoring of audit results.
3. Make analysis and assessment in finance, accounting, operations and other activities through direct inspection and indirect supervision.
4. Identify all possibilities to improve and increase the efficiency of the use of resources and funds.

5. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen. 6. Dalam melaksanakan tugasnya, SKAI harus menyampaikan laporan kepada Direktur Utama dan Dewan Komisaris dan/atau Komite audit, dan Direktur yang membawahi fungsi kepatuhan. 7. Meyakini kualitas pelaksanaan tugas manajemen atas proses manajemen risiko, sistem pengendalian intern dan tata kelola usaha telah dilaksanakan secara cukup dan efektif. 8. Memeriksa dan mengevaluasi pelaksanaan rencana Bisnis Bank Raya untuk meyakinkan bahwa semua kegiatan bisnis Bank Raya dapat berjalan dengan lancar dan sesuai dengan harapan para <i>stakeholder</i>. 9. Menyerahkan hasil audit kepada pihak internal dan eksternal secara tepat waktu sesuai dengan kebijakan, peraturan dan proses yang berlaku. 10. Menjaga hubungan baik dengan Auditee, auditor ekstern dan pihak ketiga dalam pelaksanaan kerja Satuan Kerja audit Intern.	5. Provide improvement suggestions and objective information about the activities examined at all levels of management. 6. In carrying out its duties, SKAI must submit reports to the President Director and the Board of Commissioners and/or the audit committee, and the Director in charge of the compliance function. 7. Convince that the quality of implementation of management duties on the risk management process, internal control system and business governance has been implemented sufficiently and effectively. 8. Check and evaluate the implementation of Bank Raya's Business plan to ensure that all Bank Raya's business activities can run smoothly and in accordance with stakeholder expectations. 9. Submit audit results to internal and external parties in a timely manner in accordance with applicable policies, regulations and processes. 10. Maintain good relations with Auditees, external auditors and third parties in carrying out the work of the Internal Audit Work Unit.

Ruang Lingkup Audit Intern

Scope of Internal Audit

Ruang Lingkup pekerjaan SKAI mencakup pemeriksaan dan evaluasi atas efektivitas dari kecukupan dan efektivitas sistem pengendalian, proses manajemen risiko, dan efektivitas tata kelola usaha yang menjadi tanggung jawab Manajemen.

1. Pengendalian Intern SKAI akan membantu organisasi dalam memelihara pengendalian intern yang efektif dengan cara melakukan penilaian atas :
 - Penilaian Kecukupan Struktur pengendalian Intern Hal ini dimaksudkan untuk menentukan sampai seberapa jauh sistem yang telah ditetapkan dapat diandalkan kemampuannya untuk memberikan keyakinan bahwa tujuan dan sasaran bank dapat dicapai ekonomis dan efisien.
 - Penilaian efektivitas Struktur pengendalian Intern Hal ini dimaksudkan untuk menentukan sejauh mana struktur tersebut sudah berfungsi dengan baik.
2. Proses Manajemen Risiko SKAI akan membantu organisasi dengan cara mengidentifikasi dan mengevaluasi risiko-risiko signifikan dan memberikan kontribusi terhadap peningkatan pengelolaan risiko korporat.
3. Proses Tata Kelola Usaha (*Governance*) SKAI akan melakukan penilaian, memberikan rekomendasi serta berkontribusi dalam proses peningkatan tata kelola usaha dengan lingkup sebagai berikut:
 - Pengembangan etika dan nilai-nilai dalam organisasi
 - Pengelolaan kinerja organisasi yang efektif dan akuntabel
 - Mengkomunikasikan seluruh risiko-risiko korporat serta pengendalian internal yang tepat dalam organisasi.

The scope of work of SKAI includes examination and evaluation of the effectiveness of the adequacy and effectiveness of control systems, risk management processes, and effectiveness of business governance which are the responsibility of Management.

1. Internal Control SKAI will assist the organization in maintaining effective internal control by conducting an assessment of:
 - Assessment of the Adequacy of Internal Control Structure This is intended to determine to what extent the system that has been established is reliable in its ability to provide confidence that the bank's goals and objectives can be achieved economically and efficiently.
 - Assessment of the effectiveness of the Internal control structure This is intended to determine the extent to which the structure is functioning properly.
2. The SKAI Risk Management process will assist the organization by identifying and evaluating significant risks and contributing to the improvement of corporate risk management.
3. SKAI's Governance Process (*Governance*) will conduct an assessment, provide recommendations and contribute to the process of improving business governance with the following scopes:
 - Development of ethics and values in the organization
 - Effective and accountable management of organizational performance
 - Communicate all corporate risks and appropriate internal controls within the organization.

- Mengkoordinasikan komunikasi yang efektif antara Direksi, Komisaris dan auditor eksternal.
- 4. Satuan Kerja audit Intern dapat melakukan Reguler Audit, Special Audit, dan *Fraud Audit/ Investigasi*.
- 5. Sebagai *Strategic Business Partner*, Satuan Kerja audit Intern dapat memberikan layanan konsultasi atas sistem pengendalian intern, manajemen risiko dan *corporate governance* yang menjadi ruang lingkup auditnya.
- 6. Kepala SKAI dapat menolak memberikan layanan konsultasi apabila auditor Intern tidak memiliki kemampuan dan kompetensi yang memadai atas materi konsultasi yang diminta.

- Coordinate effective communication between the Board of Directors, Commissioners and external auditors .
- 4. The Internal Audit Unit can conduct Regular Audits, Special Audits, and Fraud Audits/Investigations.
- 5. As a Strategic Business Partner, the Internal Audit Unit can provide consulting services on the internal control system, risk management and corporate governance which are the scope of the audit.
- 6. The Head of SKAI may refuse to provide consulting services if the Internal auditor does not have adequate ability and competence on the requested consulting material.

Pelaksanaan Tugas SKAI Implementation of SKAI's Tasks

Pada tahun 2021 Satuan Kerja Audit Intern telah menyelesaikan kegiatan audit dan non audit yang meliputi :

1. Penyelesaian kegiatan audit sesuai Perencanaan Audit Tahunan Tahun 2021 (Revisi) dengan pencapaian 103%, meliputi Audit Reguler Kantor Cabang, Kantor Cabang Pembantu, Kantor Kas dan Audit Teknologi Informasi, *Compulsory Audit* (LHPK BI, Kaji Ulang Penerapan MR, SAF & APU PPT, SLIK) dan *Special Audit*.
2. Melaksanakan *Strategic Business Partner* yang dilakukan dengan kegiatan *sharing session* oleh *Resident Auditor* dan auditor mengajar.
3. Menyusun Perencanaan Audit Tahunan SKAI tahun 2022.
4. Menetapkan format Perencanaan Audit Tahunan, jatuh tempo pelaporan audit dan *Mandatory Audit Resident Auditor*.
5. Melaksanakan fungsi *Quality Assurance & Improvement Program* untuk meningkatkan kualitas Audit.
6. Mengusulkan pemenuhan formasi pekerja SKAI, dengan mengusulkan pemenuhan formasi untuk Auditor Umum dan TI.
7. Melaksanakan pendidikan PAI Lateral untuk GH, Auditor dan *Resident Auditor* yang dilaksanakan dengan *BRI Corporation University*.
8. Mengikuti pendidikan sertifikasi manajemen risiko (BSMR) untuk auditor dan *Resident Auditor*.
9. Menyusun dan mereview pedoman atau petunjuk teknis audit intern diantaranya Piagam Audit, *Customer Satisfaction Survey*, Kebijakan *Whistleblowing System*.
10. Menyusun *Monitoring Offsite* dan desain *Fraud Risk Assessment* (7 parameter).
11. Mengembangkan Sistem Manajemen Audit dan digitalisasi *Monitoring Offsite* dan *Monitoring Berkala Resident Auditor* untuk mendukung proses audit SKAI.
12. Melaksanakan fungsi sebagai *Liaison Officer* terhadap pihak audit eksternal (BPK, OJK dan EY) serta melaksanakan *monitoring* pemenuhan tindak lanjut perbaikan atas hasil temuan audit eksternal.

In 2021 the Internal Audit Unit has completed audit and non-audit activities which include:

1. Completion of audit activities in accordance with the 2021 Annual Audit Planning (Revised) with an achievement of 103%, including Regular Audits of Branch Offices, Sub-Branch Offices, Cash Offices and Information Technology Audits, Compulsory Audits (LHPK BI, Review of MR Implementation, SAF & APU PPT, SLIK) and Special Audit.
2. Implementing Strategic Business Partner which is carried out by sharing session activities by Resident Auditors and teaching auditors.
3. Preparing SKAI Annual Audit Planning for 2022.
4. Establishing the format for the Annual Audit Planning, due date for audit reports and the Resident Auditor's Mandatory Audit.
5. Carrying out the function of Quality Assurance & Improvement Program to improve Audit quality.
6. Proposing the fulfillment of the formation of SKAI employees, by proposing the fulfillment of the formation for the General Auditor and IT.
7. Carrying out PAI Lateral education for GH, Auditor and Resident Auditor which was carried out with BRI Corporation University.
8. Attending risk management certification education (BSMR) for auditors and Resident Auditors.
9. Developing and reviewing internal audit guidelines or technical guidelines including the Audit Charter, Customer Satisfaction Survey, Whistleblowing System Policy .
10. Developing Offsite Monitoring and Fraud Risk Assessment design (7 parameters).
11. Developing an Audit Management System and digitize Offsite Monitoring and Resident Auditor Periodic Monitoring to support the SKAI audit process.
12. Carrying out the function as a Liaison Officer to external audit parties (BPK, OJK and EY) and carry out monitoring of the fulfillment of follow-up improvements on the findings of the external audit.

Sistem Pengendalian Internal

Internal Control System

Pengendalian Internal di lingkungan Bank Sistem pengendalian Intern merupakan suatu mekanisme proses pengawasan yang ditetapkan oleh manajemen Bank secara berkesinambungan (*ongoing basis*) yang kualitas desain dan pelaksanaannya dipengaruhi oleh Dewan Komisaris, Direksi serta seluruh pejabat dan pegawai Bank, dirancang untuk dapat memberikan keyakinan yang memadai guna:

1. Menjaga dan mengamankan harta kekayaan Bank
2. Menjamin tersedianya laporan yang akurat
3. Meningkatkan kepatuhan terhadap ketentuan yang berlaku
4. Mengurangi dampak kerugian keuangan, penyimpangan termasuk kecurangan (*fraud*) dan pelanggaran aspek kehati-hatian
5. Meningkatkan efektivitas organisasi dan meningkatkan efisiensi biaya.

Internal Control within the Bank Internal control system is a supervisory process mechanism established by the Bank's management on an ongoing basis (*ongoing basis*) whose quality of design and implementation is influenced by the Board of Commissioners, Board of Directors and all officers and employees of the Bank, designed to provide adequate assurance in order to :

1. Maintain and secure the assets of the Bank
2. Ensure the availability of accurate reports
3. Improve compliance with applicable regulations
4. Reduce the impact of financial losses, irregularities including fraud and violations of prudential aspects
5. Improve organizational effectiveness and improve cost efficiency.

Pedoman Standar

Standard Guidelines

Sistem pengendalian Internal merupakan komponen penting dalam manajemen bank dan menjadi dasar bagi kegiatan operasional bank yang sehat dan aman. Pedoman Sistem pengendalian Internal Bank Raya telah mengacu pada Surat edaran Otoritas Jasa Keuangan No.35/SEOJK.03/2017 tentang pedoman Standar Sistem pengendalian Intern bagi Bank Umum tanggal 7 Juli 2017 mencakup 5 (lima) elemen pokok yang saling berkaitan, yaitu:

1. Pengawasan oleh Manajemen dan Kultur pengendalian
2. Identifikasi dan penilaian risiko
3. Kegiatan pengendalian dan pemisahan Fungsi
4. Sistem akuntansi, Informasi dan Komunikasi
5. Kegiatan pemantauan dan tindakan Koreksi penyimpangan

Internal control system is an important component in bank management and is the basis for sound and safe bank operations. The Guidelines for the Internal Control System of Bank Raya have referred to the Circular Letter of the Financial Services Authority No. 35/SEOJK.03/2017 concerning the Standard Guidelines for the Internal Control System for Commercial Banks dated July 7, 2017 covering 5 (five) interrelated main elements, namely:

1. Supervision by Management and Culture of control
2. Risk identification and assessment
3. Control activities and separation of Functions
4. Accounting, Information and Communication Systems
5. Monitoring activities and deviation correction actions

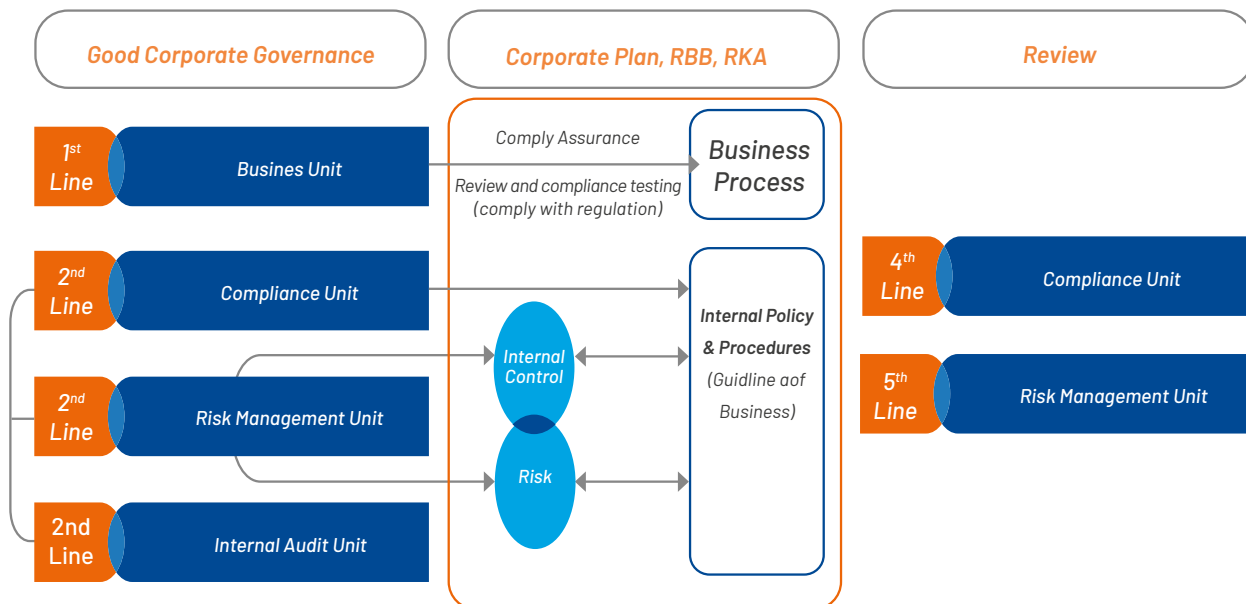
Sistem Pengendalian Bank Raya dilakukan oleh:

1. Direksi dan seluruh pejabat Bank, yang memberikan arahan, petunjuk dan pengawasan;
2. Komite eksekutif;
3. Unit Bisnis sebagai Lapis pertahanan pertama (*the First Line of Defence*).
4. Satuan Kerja yang berfungsi sebagai Lapis pertahanan Kedua (*the Second Line of Defence*) dalam hal ini adalah Satuan Kerja Manajemen risiko dan Satuan Kerja Kepatuhan.
5. SKAI sebagai Lapis pertahanan Ketiga (*the Third Line of Defence*);
6. Seluruh pekerja

Bank Raya Control System is carried out by:

1. The Board of Directors and all Bank officials, who provide direction, guidance and supervision;
2. executive committee;
3. Business Unit as the First Line of Defense.
4. The Working Units that function as the Second Line of Defense in this case are the Risk Management Unit and the Compliance Unit.
5. SKAI as the Third Line of Defense;
6. All workers

Governance BOD & BOC



Penerapan sistem Pengendalian Intern dan Kesesuaian dengan Coso - Internal Control Framework

Implementation of the Internal Control system and Compliance with Coso - Internal Control Framework

Bank Raya menerapkan Sistem pengendalian Intern yang mengacu pada COSO (Committee of the Sponsoring organizations of the treadway Commission) - Internal Control Integrated Framework dalam menyusun kerangka kerja pengendalian intern yang memastikan kecukupan pengendalian operasional maupun finansial, pelaporan keuangan, efektivitas dan efisiensi operasional, serta kepatuhan terhadap hukum dan peraturan yang berlaku.

Sistem pengendalian intern Bank Raya telah sesuai dengan Internal Control Integrated Framework yang dikembangkan oleh the Committee of Sponsoring organization of the treadway Commission (COSO). Tujuan pengendalian intern menurut coso meliputi tujuan operasional, tujuan pelaporan dan tujuan kepatuhan.

Tujuan operasional berkaitan dengan efektivitas efisiensi operasi. Tujuan pelaporan berkaitan dengan kepentingan pelaporan keuangan yang memenuhi kriteria andal, tepat waktu, transparan dan persyaratan lain yang ditetapkan oleh regulator maupun Bank. Sedangkan tujuan kepatuhan berkaitan dengan kepatuhan Bank terhadap hukum dan peraturan perundang-undangan.

Bank Raya implements an internal control system that is based on the COSO (Committee of Sponsoring Organizations for the Transportation Commission) - Internal Control Integrated Framework. This framework ensures the adequacy of operational and financial controls, financial reporting, operational effectiveness and efficiency, and compliance with applicable laws and regulations.

Bank Raya's internal control system is based on the Internal Control Integrated Framework produced by the treadway Commission's Committee of Sponsoring Organizations (COSO). Internal control objectives, as defined by COSO, include operational objectives, reporting objectives, and compliance objectives.

Operational objectives are linked to operational performance and efficiency. The reporting objectives are related to the critical nature of financial reporting that complies with the regulator's and bank's standards for reliability, timeliness, and transparency. Meanwhile, the compliance purpose is to ensure that the Bank complies with all applicable laws and regulations.

Dalam COSO disebutkan bahwa pengendalian internal merupakan sistem atau proses yang dijalankan oleh Dewan Komisaris, Direksi, Manajemen serta pekerja dalam sebuah perusahaan, untuk menyediakan jaminan yang memadai demi tercapainya tujuan pengendalian. Menurut COSO, unsur-unsur pengendalian intern meliputi komponen-komponen sebagai berikut:

1. Lingkungan pengendalian
2. Penilaian risiko
3. Kegiatan pengendalian
4. Informasi dan Komunikasi
5. Kegiatan pemantauan.

Internal control, as defined by COSO, is a method or procedure used by the Board of Commissioners, the Board of Directors, management, and workers of a business to ensure that control objectives are met. According to COSO, the elements of internal control include the following components:

1. Control environment
2. Risk assessment
3. Control activities
4. Information and Communication
5. Monitoring activities.

Unsur Pengendalian Intern Elements of Internal Control	Kesesuaian Suitability
Lingkungan Pengendalian	Dewan Komisaris melalui Komite-Komite yang telah dibentuk secara berkala telah melakukan pengkajian atas lingkungan pengendalian dan melakukan penilaian secara independen yang dikomunikasikan kepada Direksi untuk ditindaklanjuti.
Control Environment	The Board of Commissioners through the Committees that have been formed regularly has conducted an assessment of the control environment and conducted an independent assessment which was communicated to the Board of Directors for follow-up.
Penilaian Risiko	Direksi telah menetapkan prosedur untuk mengantisipasi, mengidentifikasi dan menindaklanjuti kejadian dan kendala yang dapat berpengaruh terhadap pencapaian sasaran. Dewan Komisaris melalui Komite pemantau risiko, memastikan bahwa Direksi telah melaksanakan pengelolaan risiko secara baik.
Risk Assessment	The Board of Directors has established procedures to anticipate, identify and follow up on events and obstacles that may affect the achievement of targets. The Board of Commissioners, through the risk monitoring committee, ensures that the Board of Directors has implemented risk management properly.
Aktivitas Pengendalian	Kebijakan dan prosedur bagi unit-unit bisnis dan operasional telah disusun serta disetujui oleh Direksi yang secara berkala ditinjau dan diperbaharui oleh <i>Desk Enterprise Risk Management</i> . Divisi <i>Legal & Compliance</i> bertanggung jawab untuk mensosialisasikan ketentuan regulator yang terbaru, melakukan uji kepatuhan atas kebijakan internal baru serta usulan atas produk ataupun aktivitas baru, menerapkan program anti pencucian Uang (apu), pencegahan pendanaan terorisme (ppt) serta memonitor pelaksanaan kepatuhan yang diverifikasi oleh Unit Kerja independen. Divisi <i>Legal & Compliance</i> menyampaikan laporan kepatuhan secara berkala kepada Dewan Komisaris, Direksi dan regulator. Pejabat perusahaan secara berkala meninjau kembali keberadaan dan efektivitas pengendalian, melakukan pembagian tugas yang memadai, melakukan verifikasi rutin dan akurasi data serta memiliki dan menguji rencana penanganan kondisi darurat.
Control Activities	Policies and procedures for business and operational units have been prepared and approved by the Board of Directors which are regularly reviewed and updated by the Risk Management Desk. The Legal & Compliance Division is responsible for disseminating the latest regulatory provisions, conducting compliance tests on new internal policies and proposals for new products or activities, implementing anti-money laundering (APU) programs, preventing the financing of terrorism (PPT) and monitoring the implementation of compliance that is verified by Independent Work Unit. The Legal & Compliance Division submits regular compliance reports to the Board of Commissioners, Directors and regulators. Company officials periodically review the existence and effectiveness of controls, carry out adequate division of tasks, carry out routine verification and data accuracy, and have and test plans for handling emergency conditions.

Unsur Pengendalian Intern Elements of Internal Control	Kesesuaian Suitability
Informasi Dan Komunikasi	Telah tersedia prosedur dan sistem mengenai pengumpulan data dan teknologi informasi yang dapat menghasilkan laporan kegiatan usaha, kondisi keuangan, penerapan manajemen risiko dan pemenuhan ketentuan yang mendukung pemenuhan tugas Direksi dan Dewan Komisaris.
Information and Communication	There are procedures and systems in place regarding data collection and information technology that can produce reports on business activities, financial conditions, implementation of risk management and compliance with regulations that support the fulfillment of the duties of the Board of Directors and the Board of Commissioners.
Kegiatan Pemonitoran	Direksi, pejabat Bank dan SKAI melakukan pemantauan secara terus menerus terhadap efektivitas keseluruhan pelaksanaan pengendalian intern. Pemantauan terhadap risiko utama telah diprioritaskan dan menjadi bagian dari kegiatan sehari-hari, termasuk evaluasi secara berkala.
Monitoring Activities	The Board of Directors, Bank officials and SKAI conduct continuous monitoring of the overall effectiveness of the implementation of internal control. Monitoring of key risks has been prioritized and has become part of daily activities, including regular evaluations.

Kelima unsur pengendalian intern menurut COSO sejalan dengan elemen Sistem pengendalian Intern Bank menurut Surat edaran Bank Indonesia No. 5/22/ Dpnp tentang pedoman Standar Sistem pengendalian Intern bagi Bank Umum tanggal 29 September 2003.

The five elements of internal control according to COSO are in line with the elements of the Bank's Internal Control System according to the Circular Letter of Bank Indonesia No. 5/22/ Dpnp concerning Guidelines for Internal Control System Standards for Commercial Banks dated September 29, 2003.

Evaluasi Pelaksanaan Pengendalian Internal Evaluation of Internal Control Implementation

SKAI Bank Raya sebagai *Strategic Business Partner* (SBP) telah menyesuaikan struktur organisasi SKAI dalam rangka merespon pertumbuhan bisnis Bank Raya yang semakin kompleks dengan membentuk formasi jabatan *resident auditor*. *Resident auditor* melaksanakan peran dan fungsi audit di Kantor Cabang dan Unit Kerja supervisinya yang bertujuan memberikan nilai tambah dan meningkatkan operasional bisnis di Kantor Cabang maupun Kantor Cabang pembantu. SKAI juga telah membentuk tim auditor reguler dan tim auditor teknologi yang akan melaksanakan fungsi *assurance* dengan memastikan proses pengendalian internal di Unit Kerja telah efektif, dan melaksanakan konsultasi yang bersifat independen dan objektif.

Bank Raya SKAI as *Strategic Business Partner* (SBP) has adjusted the SKAI organizational structure in order to respond to Bank Raya's increasingly complex business growth by forming a resident auditor position. Resident auditors carry out audit roles and functions in Branch Offices and their supervisory Work Units which aim to provide added value and improve business operations at Branch Offices and Sub-Branch Offices. SKAI has also formed a team of regular auditors and a team of technology auditors who will carry out the assurance function by ensuring that the internal control processes in the Work Unit are effective, and carry out independent and objective consultations.

Manajemen Risiko

Risk Management

Prinsip-prinsip manajemen risiko yang diterapkan di Bank Raya merupakan salah satu faktor utama dalam menunjang keberhasilan Bank dan secara aktif untuk mendukung pertumbuhan bank yang berkesinambungan. Pengelolaan Manajemen risiko di lingkup perusahaan pada dasarnya mengacu kepada ketentuan-ketentuan OJK yaitu Peraturan OJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 dan Surat Edaran OJK No. 34/SE0JK.03/2016 tanggal 1 September 2016 tentang penerapan Manajemen risiko bagi Bank Umum. Kerangka kerja manajemen risiko Bank menetapkan pendekatan pengelolaan risiko dan kerangka pengendalian di mana risiko dikelola untuk mendapatkan keseimbangan antara risiko (*risk*) dan pendapatan (*return*). Penerapan kerangka kerja manajemen risiko dilakukan melalui perumusan tingkat risiko yang akan diambil (*risk appetite*), dan toleransi risiko (*risk tolerance*) bagi setiap jenis risiko, pengembangan kebijakan dan prosedur manajemen risiko yang berkesesuaian serta pengembangan struktur pengendalian internal secara terpadu. Selain itu, Bank juga membangun budaya risiko yang menitikberatkan kesadaran seluruh karyawan akan risiko dan efektivitas proses manajemen risiko.

The risk management principles applied at Bank Raya are one of the main factors in supporting the success of the Bank and actively supporting the bank's sustainable growth. Management Risk management in the scope of the company basically refers to the provisions of the OJK, namely OJK Regulation no. 18/POJK.03/2016 dated March 16, 2016 and OJK Circular Letter No. 34/SE0JK.03/2016 dated September 1, 2016 concerning the implementation of risk management for commercial banks. The Bank's risk management framework establishes a risk management approach and control framework in which risk is managed to achieve a balance between risk (*risk*) and income (*return*). The implementation of the risk management framework is carried out through the formulation of the level of risk to be taken (*risk appetite*) and risk tolerance for each type of risk, the development of appropriate risk management policies and procedures and the development of an integrated internal control structure. In addition, the Bank also builds a risk culture that emphasizes awareness of all employees on risk and the effectiveness of the risk management process.

Struktur Organisasi Manajemen Risiko

Organizational Structure of Risk Management



Tata Kelola Dalam Manajemen Risiko

Governance in Risk Management

Penerapan manajemen risiko Bank Raya dikelola melalui pembentukan Komite pemantau risiko pada tingkat Dewan Komisaris serta Komite Manajemen risiko dan *Asset & Liability Committee* (ALCO) pada tingkat Direksi.

The implementation of Bank Raya's risk management is managed through the establishment of a risk monitoring committee at the level of the Board of Commissioners and the Risk Management Committee and *Asset & Liability Committee* (ALCO) at the level of the Board of Directors.

Sesuai kewenangan yang didelegasikan oleh Dewan Komisaris, Komite pemantau risiko mengevaluasi kebijakan manajemen risiko, dan memantau implementasinya, mengembangkan budaya pengelolaan risiko serta memastikan sumber daya yang memadai telah dikembangkan untuk memastikan pengelolaan risiko di Bank. Sementara Komite Manajemen risiko bertanggung jawab kepada presiden Direktur dengan tugas utamanya menyusun dan memperbarui kebijakan manajemen risiko serta mengkoordinir penerapannya, memantau kecukupan permodalan Bank terhadap eksposur risiko

In accordance with the authority delegated by the Board of Commissioners, the Risk Monitoring Committee evaluates risk management policies, and monitors their implementation, develops a risk management culture and ensures that adequate resources have been developed to ensure risk management in the Bank. Meanwhile, the Risk Management Committee is responsible to the President Director with the main task of compiling and updating risk management policies and coordinating their implementation, monitoring the Bank's capital adequacy for risk exposure in

sesuai dengan ketentuan yang berlaku, dan menilai keseluruhan komposisi risiko dalam portofolio Bank.

Direktur *Risk Management* yang membawahi *Desk Enterprise Risk Management* yang independen terhadap fungsi Bisnis dan operasional Bank serta fungsi yang melakukan audit. *Desk Enterprise Risk Management* bertanggung jawab melakukan pemantauan pelaksanaan manajemen risiko dan mengkaji secara berkala terhadap proses manajemen risiko termasuk pengkajian setiap usulan produk dan aktivitas baru.

Satuan Kerja Manajemen risiko dalam rangka proses pengukuran dan pemantauan risiko membuat laporan profil risiko yang merupakan laporan penilaian terhadap eksposur risiko yang melekat pada aktivitas fungsional (*inherent risk*) serta kecukupan sistem pengendalian risiko (*risk control system*). Laporan profil risiko dibuat setiap bulan yang kemudian dilaporkan kepada Direksi dan dibahas dalam Komite Manajemen risiko.

Penerapan manajemen risiko di Bank Raya meliputi empat pilar utama dan secara ringkas dijabarkan di bawah ini.

accordance with applicable regulations, and assessing the overall risk composition in the Bank's portfolio.

Risk Management Director who oversees the Risk Management Desk which is independent of the Bank's business and operational functions as well as functions that perform audits. The Risk Management Desk is responsible for monitoring the implementation of risk management and periodically reviewing the risk management process including reviewing each proposed new product and activity.

The Risk Management Unit in the context of the risk measurement and monitoring process makes a risk profile report which is an assessment report on the risk exposure inherent in functional activities (*inherent risk*) as well as the adequacy of the risk control system. A risk profile report is prepared every month which is then reported to the Board of Directors and discussed in the Risk Management Committee.

The implementation of risk management at Bank Raya includes four main pillars and is briefly described below.

Pilar Pillar	Keterangan Description
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	Pengawasan aktif Dewan Komisaris dilakukan antara lain melalui persetujuan dan evaluasi atas kebijakan manajemen risiko yang disusun oleh Direksi. Secara berkala Dewan Komisaris melakukan evaluasi pelaksanaan kebijakan manajemen risiko melalui forum rapat Direksi dan Komisaris maupun dalam rapat Komite pemantau risiko (Kpr). Pengawasan aktif Direksi dilaksanakan antara lain dengan penyusunan, persetujuan, dan implementasi serta evaluasi atas kebijakan dan prosedur manajemen risiko, baik yang dilakukan melalui forum rapat Direksi maupun rapat Komite Manajemen risiko.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	Active supervision of the Board of Commissioners is carried out, among others, through the approval and evaluation of risk management policies prepared by the Board of Directors. The Board of Commissioners periodically evaluates the implementation of risk management policies through the Board of Directors and Commissioners meeting forums as well as in Risk Monitoring Committee (KPR) meetings. Active supervision of the Board of Directors is carried out, among others, by the preparation, approval, and implementation as well as evaluation of risk management policies and procedures, whether carried out through the Board of Directors meeting forums and risk Management Committee meetings.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	Perumusan Kecukupan Kebijakan, prosedur dan penetapan Limit dilakukan pengkinian sejalan dengan sasaran strategi dan bisnis bank secara keseluruhan. Dalam implementasinya, Kebijakan-kebijakan ini direview secara berkala dengan persetujuan sampai dengan tingkat Direksi melalui rapat komite ataupun melalui sirkulasi kepada Direksi sesuai dengan tingkat kewenangan. Direksi Bank memiliki wewenang untuk menetapkan limit risiko, tingkat toleransi bagi setiap jenis risiko, dan eksposur risiko, dengan memperhatikan pengalaman, kemampuan permodalan, kemampuan sistem dan perangkat manajemen risiko, sumber daya yang dimiliki, serta ketentuan yang berlaku.
Pillar 2 Adequacy of Policies, procedures and Limits	Formulation of Adequacy Policies, procedures and setting limits are updated in line with the overall strategy and business objectives of the bank. In its implementation, these policies are reviewed periodically with approval up to the level of the Board of Directors through committee meetings or through circulation to the Board of Directors according to the level of authority. The Bank's Board of Directors has the authority to determine risk limits, tolerance levels for each type of risk, and risk exposure, taking into account experience, capital capability, risk management system and equipment capabilities, available resources, and applicable regulations.

Pilar Pillar	Keterangan Description
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	Proses penerapan manajemen risiko yang meliputi identifikasi, pengukuran, pemantauan dan pengendalian risiko dilakukan secara berkesinambungan oleh <i>three line of defense</i> , yaitu seluruh <i>risk taking</i> unit selaku <i>first line</i> , unit kerja kepatuhan dan manajemen risiko selaku <i>second line</i> dan unit internal audit selaku <i>third line</i> .
Pillar 3 Risk Management Process and Risk Management Information System	The risk management implementation process which includes identification, measurement, monitoring and control of risk is carried out continuously by the three lines of defense, namely all risk taking units as the first line, compliance and risk management units as the second line and the internal audit unit as the third line.
Pilar 4 Sistem pengendalian Intern Manajemen risiko	Sistem pengendalian intern Manajemen risiko menjadi tanggung jawab bersama seluruh manajemen dan karyawan Bank Raya. Kesadaran akan risiko (<i>risk awareness</i>) terus ditanamkan di setiap jenjang organisasi dan merupakan bagian yang tidak terpisahkan dari budaya Bank. Penerapan konsep <i>three lines of defenses</i> dalam pengelolaan risiko, di mana pengelolaan risiko dilakukan oleh semua lini organisasi, dan dilakukan pengawasan (<i>oversight</i>) oleh Dewan Komisaris dan Direksi. Penerapan konsep <i>three lines of defenses</i> dijabarkan sebagai berikut: First Line of Defense Semua unit kerja termasuk seluruh staf di dalamnya harus memastikan secara langsung bahwa manajemen risiko telah dilaksanakan dengan efektif atas seluruh risiko melekat, dalam lingkup dan tanggung jawab kerjanya masing-masing, termasuk dalam pengambilan keputusan risiko, dengan menerapkan <i>four eyes principle/dual control mechanism</i> dimana terdapat peranan <i>maker</i> dan <i>checker</i> di dalamnya. Second Line of Defense Terdiri dari Direktur bidang yang bertanggung jawab terhadap setiap jenis risiko pada masing-masing unit kerja di bawahnya, dengan memberikan delegasi kewenangan serta dukungan atas keputusan risiko yang diambil oleh <i>First Line of Defence</i>. Satuan Kerja Kepatuhan dan Satuan Kerja Manajemen risiko mendukung terciptanya budaya kepatuhan dan kesadaran risiko pada <i>First Line of Defence</i> dan <i>Second Line of Defence</i> melalui pemberian opini/kaji ulang secara independen terkait regulasi maupun strategi pengelolaan risiko. Third Line of Defence SKAI maupun eksternal auditor menjalankan fungsi <i>assurance</i> dalam menilai efektivitas dari penerapan manajemen risiko baik pada <i>First Line of Defence</i> maupun <i>Second Line of Defence</i>.
Pillar 4 Internal control system Risk management	Internal control system Risk management is the joint responsibility of all management and employees of Bank Raya. Risk awareness continues to be instilled at every level of the organization and is an integral part of the Bank's culture. Implementing the concept of three lines of defenses in risk management, where risk management is carried out by all lines of the organization, and carried out supervision (<i>oversight</i>) by the Board of Commissioners and the Board of Directors. The application of the three lines of defenses concept is described as follows: First Line of Defense All work units including all staff in them must directly ensure that risk management has been carried out effectively on all inherent risks, within the scope and responsibilities of their respective work, including in risk decision making, by implementing the four eyes principle/dual control mechanism. there is a maker and checker role in it. Second Line of Defense Consists of the Director of the field who is responsible for each type of risk in each work unit under him, by providing delegation of authority and support for risk decisions taken by the First Line of Defense. The Compliance Unit and Risk Management Unit support the creation of a compliance culture and risk awareness in the First Line of Defense and Second Line of Defense by providing independent opinions/reviews related to regulations and risk management strategies. Third Line of Defense SKAI and external auditors carry out the assurance function in assessing the effectiveness of the implementation of risk management in both the First Line of Defense and Second Line of Defense.

Satuan Kerja Manajemen Risiko Risk Management Unit

Satuan Kerja Manajemen risiko bertanggung jawab dalam mengelola seluruh risiko yang dihadapi Bank, termasuk dalam hal pengembangan *tools* pendukung yang dibutuhkan dalam proses bisnis dan pengelolaan risiko. Selain itu, terdapat unit kerja yang bertindak sebagai *risk counterpart* dari setiap unit bisnis dalam proses *four-eye* pemberian kredit. Menyadari bahwa pengelolaan risiko menjadi tanggung jawab seluruh unit kerja di Bank, maka keberhasilan pengelolaan risiko ditentukan oleh adanya *risk awareness* di seluruh unit kerja Bank yang disertai dengan kemampuan teknis yang memadai. Oleh karena itu, Bank Raya senantiasa meningkatkan kapabilitas dan pengetahuan seluruh pegawai terutama dalam hal pengelolaan risiko, dengan menyelenggarakan pelatihan internal maupun eksternal secara berkala.

The Risk Management Unit is responsible for managing all risks faced by the Bank, including the development of supporting tools needed in business processes and risk management. In addition, there are work units that act as risk counterparts for each business unit in the four-eye lending process. Realizing that risk management is the responsibility of all work units in the Bank, the success of risk management is determined by the existence of risk awareness in all Bank work units accompanied by adequate technical capabilities. Therefore, Bank Raya continues to improve the capabilities and knowledge of all employees, especially in terms of risk management, by conducting regular internal and external training.

Sistem Manajemen Risiko Risk Management System

Pengelolaan risiko dilakukan pada seluruh aktivitas kegiatan bank dengan mengacu kepada ketentuan standar pengelolaan yang ditetapkan oleh pihak regulator. Proses penerapan manajemen risiko yang meliputi identifikasi, pengukuran, pemantauan dan pengendalian risiko dilakukan secara berkesinambungan oleh *three line of defense*, yaitu seluruh *risk taking unit* selaku *first line*, unit kerja kepatuhan dan manajemen risiko selaku *second line* dan unit internal audit selaku *third line*.

Risk management is carried out in all bank activities by referring to the standard management provisions set by the regulator. The risk management implementation process which includes identification, measurement, monitoring and control of risk is carried out continuously by the three lines of defense, namely all risk taking units as the first line, compliance and risk management units as the second line and the internal audit unit as the third line.

Tugas dan Tanggung Jawab Fungsi Manajemen Risiko Duties and Responsibilities of the Risk Management Function

1. Penyusunan metodologi manajemen risiko kredit, manajemen risiko operasional, manajemen risiko pasar, manajemen risiko likuiditas dan risiko lainnya.
 2. Penyusunan dan analisa profil risiko, tingkat kesehatan bank, kecukupan modal, *credit risk rating & scoring*
 3. Penyusunan *Risk Appetite Statement* (RAS)
 4. Penyusunan *Contingency Funding Plan* (rencana pendanaan darurat)
 5. Penyusunan dan analisa *loan portfolio guideline* (LPG), *sustainability finance*, *risk based pricing*, dan *stress testing*
 6. Menyusun, menyempurnakan dan melaksanakan kebijakan/ketentuan/prosedur dan metodologi proses manajemen risiko (identifikasi, pengukuran, pemantauan dan pengendalian termasuk validasi data, strategi manajemen risiko, profil risiko, *stress testing*, dan memantau risiko (risiko kredit, risiko pasar,
1. Preparation of methodologies for credit risk management, operational risk management, market risk management, liquidity risk management and other risks.
 2. Preparation and analysis of risk profile, bank soundness level, capital adequacy, credit risk rating & scoring
 3. Preparation of Risk Appetite Statement (RAS)
 4. Preparation of Contingency Funding Plan (emergency funding plan)
 5. Preparation and analysis of loan portfolio guidelines (LPG), sustainability finance, risk based pricing, and stress testing
 6. Develop, refine and implement policies/conditions/procedures and methodologies of risk management processes (identification, measurement, monitoring and control including data validation, risk management strategies, risk profiles, stress testing, and monitoring risks (credit risk, market risk, liquidity risk, operational

risiko likuiditas, risiko operasional dan risiko lainnya) Manajemen Kelangsungan Usaha (MKU)/Business Continuity Management (BCM)

7. Menilai kecukupan pengelolaan risiko atas produk dan/atau aktiva baru yang diusulkan unit kerja
8. Penyelenggaraan *Risk Management Committee* (RMC)

risk and other risks) Business Continuity Management (MKU)/ Business Continuity Management (BCM)

7. Assess the adequacy of risk management for new products and/or assets proposed by the work unit
8. Implementation of the Risk Management Committee (RMC)

Fokus Manajemen Risiko Tahun 2021

Risk Management Focus in 2021

Berikut merupakan program kerja manajemen risiko selama 2021:

1. Melakukan *review* kebijakan dan pelaporan *mandatory*, diantaranya *Risk Based Bank Rating* (RBBR), Profil Risiko, Tingkat Kesehatan Bank, *Risk Appetite Statement* (RAS), Modal sesuai ICAAP, ATMR Kredit, Pasar dan Operasional, Rasio Pengungkit, LCR & NSFR untuk konglomerasi
2. Melakukan *review* kebijakan manajemen risiko, metodologi, pengukuran dan *monitoring* risiko
3. Melakukan penyusunan *Stress Test* Kredit, Likuiditas, Pasar dan Modal Terintegrasi
4. Menentukan *Macroeconomic Value* (MEV) dalam pembuatan dan pengkinian *model Probability of Default* (PD) untuk PSAK 71
5. Melakukan penyusunan *Backtesting Credit Risk Rating* (CRR) & *Credit Risk Scoring* (CRS), serta CKPN
6. Melakukan *review* penyetaraan *Credit Risk Rating* (CRR) Bank Raya dengan *scoring/CRR Fintech Peer to Peer Lending*
7. Melakukan penyusunan *Loan Portfolio Guidelines* (LPG), *Risk Control Self Assessment* (RCSA), simulasi *Business Continuity Management* (BCM), Rencana Aksi Keuangan Berkelanjutan (RAKB) serta laporan *Sustainability Report* (SR)
8. Melakukan *approval limit Uncommitted Credit Line* (UCL) Risiko Pasar
9. Melakukan *review* kecukupan mitigasi risiko atas produk dan/ atau aktivitas baru (PAB)
10. Melakukan *review* kecukupan perangkat mitigasi operasional transmigrasi organisasi Unit Kerja Operasional (UKO)
11. Meningkatkan kompetensi SDM penyusun CRR, CRS, aktivitas *trading treasury*, dan aktivitas *banking book*.

The following is a risk management work program for 2021:

1. Reviewing mandatory policies and reporting , including Risk Based Bank Rating (RBBR), Risk Profile, Bank Soundness Level, Risk Appetite Statement (RAS), Capital according to ICAAP, RWA Credit, Market and Operations, Leverage Ratio, LCR & NSFR for conglomerates
2. Reviewing risk management policies, methodologies, measuring and monitoring risks
3. Performing the preparation of Credit, Liquidity, Market and Integrated Capital Stress Tests
4. Determining Macroeconomic Value (MEV) in the creation and updating of the Probability of Default (PD) model for PSAK 71
5. Performing the preparation of Backtesting Credit Risk Rating (CRR) & Credit Risk Scoring (CRS), as well as CKPN
6. Reviewing the equalisation of Bank Raya's Credit Risk Rating (CRR) with scoring / CRR Fintech Peer to Peer Lending
7. Preparing Loan Portfolio Guidelines (LPG), Risk Control Self Assessment (RCSA) , Business Continuity Management (BCM) simulation, Sustainable Finance Action Plan (RAKB) and Sustainability Report (SR)
8. Approval of Uncommitted Credit Line (UCL) limit for Market Risk
9. Reviewing the adequacy of risk mitigation for new products and/or activities (PAB)
10. Reviewing the adequacy of operational mitigation tools for the Operational Work Unit (UKO) transmigration organization
11. Improving the competence of human resources who compose CRR, CRS, treasury trading activities, and banking book activities.

Efektivitas Penerapan Manajemen Risiko

Effectiveness of Risk Management Implementation

Penerapan Manajemen risiko di Bank Raya adalah untuk menjaga aset, modal Bank, mendukung proses pengambilan keputusan, mengoptimalkan *profile risk return*, meningkatkan nilai perusahaan, serta melindungi reputasi Bank. Acuan dasar penerapan manajemen risiko dilakukan dengan berpedoman pada Peraturan Otoritas Jasa

The application of risk management at Bank Raya is to maintain the Bank's assets, capital, support the decision-making process, optimize the risk return profile , increase company value, and protect the Bank's reputation. The basic reference for the application of risk management is carried out by referring to the Regulation of the Financial Services

Keuangan (POJK) tentang Penerapan Manajemen Risiko bagi Bank Umum No. 18/POJK.03/2016 tanggal 16 Maret 2016, yang dilaksanakan melalui suatu kerangka kerja dan tata kelola manajemen risiko melalui tahapan proses manajemen risiko yaitu identifikasi, pengukuran, pemantauan dan pengendalian risiko pada semua level yang berdampak terhadap bisnis, operasional dan organisasi.

Prinsip pengelolaan risiko Bank Raya adalah secara *proaktif* mendukung Bank dalam mencapai pertumbuhan yang sehat dan berkelanjutan serta memelihara tingkat *risk-adjusted return* yang optimal dan *shareholder value*. Penerapan manajemen risiko dilakukan secara efektif dengan memastikan bahwa pengelolaan manajemen risiko telah dilakukan dengan baik dari sisi kecukupan bangunan organisasi manajemen risiko (Divisi dan Komite MR yang dibentuk), kecukupan kompetensi seluruh pekerja terhadap prinsip *risk and return* dan alternatif metode pengendalian risiko.

Untuk meningkatkan penerapan manajemen risiko, Bank Raya telah memenuhi kebijakan peraturan OJK Nomor 7/25/PBI/2005 tentang Sertifikasi Manajemen Risiko bagi Pengurus dan Pejabat Bank Umum, dengan pencapaian di 2021 sebagai berikut:

Authority (POJK) concerning the Implementation of Risk Management for Commercial Banks No. 18/POJK.03/2016 dated March 16, 2016, which is implemented through a risk management framework and governance through the stages of the risk management process, namely identification, measurement, monitoring and control of risks at all levels that have an impact on business, operations and organization.

Bank Raya's risk management principle is to proactively support the Bank in achieving healthy and sustainable growth and maintaining a risk-adjusted level optimal return and shareholder value. The implementation of risk management is carried out effectively by ensuring that risk management has been carried out properly in terms of the adequacy of the risk management organization building (the established MR Division and Committee), the adequacy of the competence of all employees to the principles of risk and return and alternative risk control methods.

To improve the implementation of risk management, Bank Raya has complied with the OJK regulatory policy Number 7/25/PBI/2005 concerning Risk Management Certification for Commercial Bank Managers and Officers, with the following achievements in 2021:

Program Sertifikasi Manajemen Risiko Risk Management Certification Program	Pegawai Employee
Level 1	260
Level 2	170
Level 3	56
Level 4	16
Level 5	5
Total	507

Manajemen Permodalan Capital Management

Perhitungan rasio kewajiban modal minimum telah sesuai dengan Peraturan OJK No. 11/POJK.03/2016 tentang Kewajiban penyediaan Modal Minimum Bank Umum yang berlaku sejak 2 Februari 2016 dan sebagaimana telah diubah dengan Peraturan OJK No. 34/POJK.03/2016 tentang perubahan atas Peraturan OJK No. 11/POJK.03/2016.

Pengelolaan risiko melalui permodalan dengan melakukan diversifikasi sumber permodalan yang disinkronisasi dengan rencana strategis jangka panjang dan kebijakan alokasi modal secara efisien pada segmen bisnis yang memiliki *profile risk return* yang optimal. Hal ini bertujuan untuk memenuhi ekspektasi para pemangku kepentingan termasuk investor dan regulator.

The calculation of the minimum capital obligation ratio is in accordance with OJK Regulation No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks which has been in effect since February 2, 2016 and as amended by OJK Regulation No. 34/POJK.03/2016 regarding amendments to OJK Regulation No. 11/POJK.03/2016.

Risk management is accomplished by capital diversification, which is coordinated with long-term strategic goals and effective capital allocation strategies in company areas with the best risk-reward profile. It strives to live up to stakeholders' expectations, particularly investors and regulators.

Bank Raya memiliki kecukupan modal terhadap potensi kerugian risiko kredit, risiko pasar dan risiko operasional, baik berdasarkan ketentuan dan peraturan yang berlaku (*regulatory capital*) maupun kebutuhan internal (*economic capital*). Penilaian kecukupan permodalan bank melalui *Internal Capital Adequacy Assessment Process* yang didasarkan pada profil Risiko Bank.

Bank Raya possesses sufficient capital to protect itself against potential losses arising from credit risk, market risk, and operational risk, both in accordance with existing rules and regulations (*regulatory capital*) and internal requirements (*economic capital*). Assessing a bank's capital sufficiency using the *Internal Capital Adequacy Assessment Process* in accordance with the risk profile of the bank.

Pengelolaan dan Pengungkapan Eksposur Risiko

Risk Exposure Management and Disclosure

Risiko Kredit

Merupakan risiko akibat kegagalan debitur dan/atau pihak lain (*counterparty*) dalam memenuhi kewajiban kepada Bank. risiko Kredit dapat bersumber dari berbagai aktivitas bisnis bank.

Credit Risk

Credit risk is a risk due to the failure of the debtor and/or other party (*counterparty*) in fulfilling obligations to the Bank. Credit risk can be sourced from various bank business activities.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	a) Proses putusan kredit diatas nominal tertentu wajib melalui Komite Kredit Direksi dan konsultasi kepada Dewan Komisaris b) Pemantauan tindak lanjut oleh Dewan Komisaris dan Direksi apabila terdapat pelampauan limit risiko c) Pelaksanaan forum rmc triwulanan yang membahas mengenai isu strategis terkait dengan pengelolaan risiko perusahaan, khususnya risiko kredit. d) Pelaporan profil risiko triwulanan dari Unit Kerja Manajemen risiko kepada Direksi.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	a) The credit decision process above a certain nominal must go through the Credit Committee of the Board of Directors and consultation with the Board of Commissioners b) Follow-up monitoring by the Board of Commissioners and the Board of Directors if there is a risk limit exceedance c) Implementation of quarterly RMC forums that discuss strategic issues related to corporate risk management, particularly credit risk. d) Quarterly risk profile reporting from the Risk Management Unit to the Board of Directors.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	a) Ketentuan <i>Loan Portfolio Guideline</i> (LPG) b) Ketentuan PDWK berjenjang
Pillar 2 Adequacy of Policies, procedures and Limits	a) Terms of <i>Loan Portfolio Guideline</i> (LPG) b) PDWK tiered provisions

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	a) Identifikasi risiko kredit dilakukan menggunakan sistem <i>Credit risk rating</i> (CRR) dan <i>Credit risk Scoring</i> (CRS). Pemeringkatan internal (<i>Credit risk rating/Credit risk Scoring</i>) yang digunakan di BRI saat ini disusun berdasarkan data empiris/historis dari <i>debitur existing</i> BRI dengan menggunakan metodologi statistik. Atas pemeringkatan internal ini dilakukan kaji ulang secara berkala terhadap akurasi model dan asumsi yang digunakan untuk memproyeksikan kegagalan, dan dilakukan penyesuaian asumsi jika terjadi perubahan ketentuan baik eksternal (regulator) maupun internal. b) Pengukuran risiko kredit dilakukan dengan internal model menggunakan metode standard yaitu dengan menghitung <i>probability of default</i> dan <i>loss given default</i> untuk masing masing segmen bisnis berdasarkan pergeseran kolektibilitas kreditnya. Selain itu, serangkaian <i>Stress test</i> juga dilakukan untuk mengukur potensi kerugian maksimal apabila terjadi kondisi <i>stress</i>. <i>Stress test</i> tersebut dilakukan berdasarkan beberapa hipotesa dan asumsi antara lain: pertumbuhan ekonomi, inflasi, harga minyak dunia serta perubahan kurs rupiah. Hal lainnya yang dilakukan adalah dengan <i>guidance</i> melalui <i>Loan portfolio Guideline</i> (LPG), sehingga dengan adanya LPG ini akan membuat pemberian kredit menjadi lebih terarah sesuai potensi masing-masing unit kerja. c) Pemantauan risiko kredit dilakukan melalui proses <i>monitoring</i> portofolio kredit yang merupakan tanggung jawab unit kerja <i>monitoring</i> risiko kredit di kantor pusat. <i>Monitoring</i> portofolio dilakukan berdasarkan kualitas kredit, sektor ekonomi, penggunaan kredit, geografi unit kerja pemrakarsa, dan sebagainya. Pemantauan juga dilakukan untuk limit risiko kredit antara lain: NPL, CL, komposisi <i>Loan at risk</i> (LAR), <i>Credit Cost</i>, <i>NPL Coverage ratio</i>. d) Pengendalian risiko kredit dilakukan melalui: • Putusan kredit mempertimbangkan aspek analisa agunan, dimana harus mematuhi ketentuan minimum <i>loan to value</i> atau minimum <i>coverage</i> terhadap pinjaman • Prosedur perbaikan kualitas kredit melalui restrukturisasi • Prosedur meminimalkan kerugian risiko kredit melalui penyelesaian kredit dan optimalisasi penagihan • Prosedur penghapusbukuan kredit bermasalah
Pillar 3 Risk Management Process and Risk Management Information System	a) Credit risk identification is carried out using the Credit risk rating (CRR) and Credit risk Scoring (CRS) systems. The internal rating (Credit risk rating/Credit risk Scoring) used at BRI is currently based on empirical/historical data from existing BRI debtors using a statistical methodology. For this internal rating, periodic reviews of the accuracy of the model and assumptions used to project failure are carried out, and assumptions adjustments are made in the event of changes in regulations, both external (regulators) and internally. b) Credit risk measurement is carried out using an internal model using the standard method, namely by calculating the probability of default and loss given default for each business segment based on shifts in credit collectibility. In addition, a series of stress tests are also carried out to measure the maximum potential loss in the event of a stress condition. The stress test was conducted based on several hypotheses and assumptions, including: economic growth, inflation, world oil prices and changes in the rupiah exchange rate. Another thing that is being done is with guidance through the Loan Portfolio Guideline (LPG), so that the existence of this LPG will make lending more focused according to the potential of each work unit. c) Credit risk monitoring is carried out through a credit portfolio monitoring process which is the responsibility of the credit risk monitoring work unit at the head office. Portfolio monitoring is carried out based on credit quality, economic sector, use of credit, the geography of the initiating work unit, and so on. Monitoring is also carried out for credit risk limits, including: NPL , CL, composition of Loan at risk(LAR), Credit Cost, NPL Coverage ratio. d) Credit risk control is carried out through: • Credit decisions take into account aspects of collateral analysis, which must comply with the minimum loan-to-value or minimum coverage for loans • Procedure for improving credit quality through restructuring • Procedures for minimizing credit risk losses through credit settlement and collection optimization • Non-performing loan write-off procedures

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	a) <i>Four eyes principles</i> : pemisahan fungsi pemrakarsa kredit dengan pemutus b) Pemisahan unit kerja pemrakarsa kredit (bisnis) dengan unit kerja analisis risiko kredit untuk segmen Korporasi c) Penggunaan aplikasi <i>Loan approval System</i> (LAS) yang meliputi identifikasi risiko kredit melalui perhitungan <i>Credit Scoring</i> dan putusan kredit yang telah sesuai dengan ketentuan pdwk berjenjang. d) Integrasi antara pelampauan limit risiko kredit dengan penilaian kinerja unit kerja bisnis dan individual.
Pillar 4 Internal control system Risk management	a) <i>Four eyes principles</i> : separation of the function of the credit initiator and the breaker b) Separation of the credit initiating work unit (business) from the credit risk analysis work unit for the Corporate segment c) The use of the <i>Loan approval System</i> (LAS) application which includes credit risk identification through <i>Credit Scoring</i> calculations and credit decisions that are in accordance with the tiered pdwk provisions. d) Integration between exceeding the credit risk limit and assessing the performance of business and individual work units.

Risiko Pasar

Market Risk

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	a) Pemantauan tindak lanjut oleh Dewan Komisaris dan Direksi apabila terdapat pelampauan limit risiko. b) Rapat Komite pengawas Manajemen risiko yang dilaksanakan setiap triwulan c) Pelaksanaan forum rmc triwulanan yang membahas mengenai isu strategis terkait dengan pengelolaan risiko pasar. d) Forum ALCO sebagai bentuk pengawasan aktif yang dilaksanakan setiap bulan e) Pelaporan profil risiko pasar dari Unit Kerja Manajemen risiko kepada Direksi.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	a) Follow-up monitoring by the Board of Commissioners and the Board of Directors if there is a risk limit exceedance. b) Risk management supervisory committee meeting which is held quarterly c) Implementation of quarterly RMC forums that discuss strategic issues related to market risk management. d) ALCO Forum as a form of active supervision which is carried out every month e) Market risk profile reporting from the Risk Management Unit to the Board of Directors.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	a) Kebijakan, prosedur, dan limit risiko pasar yang tertuang dalam Limit profil risiko pasar dan Limit aktivitas <i>treasury</i> (<i>Limit Dealer</i>) b) Kebijakan <i>Interest Rate Riskin The Banking Book</i> (IRRBB) dalam Kebijakan Umum Manajemen risiko c) Kebijakan terkait aktivitas Bisnis <i>treasury</i> lainnya melalui pedoman pelaksanaan aktivitas <i>treasury</i> .
Pillar 2 Adequacy of Policies, procedures and Limits	a) Market risk policies, procedures and limits as stated in Market risk profile limits and treasury activity limits (<i>Dealer Limits</i>) b) Interest rate risk in the Banking Book (IRRBB) policy in the General Risk Management Policy c) Policies related to other treasury business activities through guidelines for implementing treasury activities.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	a) Identifikasi - Perhitungan risiko Suku Bunga dan nilai tukar menggunakan metode standar terhadap posisi seluruh instrumen keuangan Bank Raya yang diklasifikasikan sebagai <i>trading Book</i> dan <i>Banking Book</i>. Untuk Instrumen yang diklasifikasikan sebagai <i>Banking Book</i>. - Faktor risiko yang diperhitungkan dalam risiko suku bunga dalam metode standar yaitu: - Risiko Spesifik (<i>Specific risk</i>) dari setiap penerbit efek atau instrumen keuangan, tanpa memperhatikan posisi <i>long</i> atau posisi <i>short</i>. Dengan demikian proses saling hapus (<i>offset</i>) tidak dimungkinkan kecuali posisi tersebut bersifat identik; - Risiko Umum (<i>General Market risk</i>) dari keseluruhan portofolio, dimana posisi <i>long</i> atau posisi <i>short</i> dalam efek atau instrumen yang berbeda dapat dilakukan saling hapus. - Nilai pasar surat berharga yang digunakan dalam perhitungan risiko Spesifik dan risiko Umum adalah <i>dirty price</i>, yaitu nilai pasar surat berharga (<i>clean price</i>) ditambah dengan <i>present value</i> dari pendapatan bunga yang akan diterima (<i>accrued interest</i>). Perhitungan <i>present value</i> atas <i>accrued interest</i> dapat tidak dilakukan apabila berdasarkan jangka waktu pembayaran kupon, nilai <i>present value</i> tersebut tidak menimbulkan perbedaan yang material. Perhitungan risiko nilai tukar dilakukan terhadap semua posisi BRI baik <i>trading Book</i> dan <i>Banking Book</i> dalam valuta asing termasuk emas, dengan mengacu pada perhitungan posisi Devisa neto (PDN). - Faktor risiko yang diperhitungkan dalam risiko suku bunga dalam perhitungan <i>Interest rate risk in the Banking Book</i> (IRRBB) yaitu: <i>Repricing risk</i>, yaitu risiko kerugian yang disebabkan adanya perbedaan waktu antara <i>repricing aset</i> dan <i>repricing liabilitas</i> apabila terjadi perubahan suku bunga. <i>Basis risk</i>, adalah risiko kerugian karena penggunaan indeks suku bunga yang berbeda antara aktiva dan pasiva. - Posisi yang dimiliki untuk tujuan memperoleh keuntungan jangka pendek dari pergerakan harga (<i>price movement</i>) secara aktual dan atau potensial. - Seluruh efek utang dengan suku bunga tetap atau mengambang, dan seluruh instrumen keuangan yang memiliki karakteristik yang sejenis, termasuk sertifikat deposito yang dapat diperdagangkan <i>negotiable Certificates of Deposits</i> dan surat-surat berharga yang dijual oleh BRI dengan syarat dibeli kembali (<i>repo/Securities Lending</i>). - Posisi valuta asing Bank Raya dalam <i>trading book</i> dan <i>banking book</i> yang terekspos risiko nilai tukar. b) Pengukuran - Pengukuran risiko pasar dilakukan secara Berkala, melakukan simulasi <i>Economic Value of Equity</i> (Eve) dan <i>Net Interest Income</i> (NII) secara berkala atau setiap terjadi perubahan suku bunga pasar dan menata <i>profil maturity</i> surat berharga. - Valuasi portofolio <i>trading book</i> dan <i>banking book</i> dilakukan dengan menggunakan kuotasi harga pasar dari instrumen yang diperdagangkan secara aktif (<i>mark to market</i>). Harga pasar tersebut mencerminkan transaksi aktual dan rutin yang dilakukan secara wajar. Hasil valuasi berdasarkan nilai pasar (<i>mark to market</i>) divalidasi secara periodik untuk memastikan konsistensi dan kewajaran harga pasar yang digunakan. Apabila harga pasar tidak tersedia karena instrumen tidak aktif diperdagangkan maka valuasi penetapan nilai wajar menggunakan pendekatan simulasi harga (<i>mark-to-model</i>). - Melakukan <i>stress testing</i> risiko pasar secara berkala atau sesuai dengan keadaan pasar c) Pemantauan dan Pengendalian Dalam melakukan proses manajemen risiko pasar, Direksi secara rutin melakukan evaluasi risiko pasar melalui laporan harian posisi Devisa netto, forum Asset & Liability Committee (ALCO), Risk Management Committee (RMC) serta laporan eksposur risiko pasar melalui <i>dashboard</i> profil risiko pasar.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pillar 3 Risk Management Process and Risk Management Information System	a) Identification 1. Calculation of interest rate and exchange rate risk uses the standard method for the position of all Bank Raya financial instruments classified as trading book and banking book. For Instruments classified as Banking Book. 2. The risk factors that are taken into account in the interest rate risk in the standard method are: - Specific risk (Specific risk) of each issuer of securities or financial instruments, regardless of long position or short position. Thus, the offset process is not possible unless the positions are identical; - General Market risk of the entire portfolio, where long positions or short positions in different securities or instruments can be offset. 3. The market value of securities used in the calculation of Specific risk and General risk is the dirty price, which is the market value of the securities (clean price) plus the present value of accrued interest. The calculation of the present value of accrued interest may not be carried out if based on the coupon payment period, the present value value does not cause a material difference. The calculation of exchange rate risk is carried out on all BRI positions, both trading book and banking book in foreign currencies including gold, with reference to the calculation of net foreign exchange positions (NOP). 4. The risk factors that are taken into account in interest rate risk in the calculation of Interest rate risk in the Banking Book (IRRBB) are: - Repricing risk, namely the risk of loss caused by the time difference between repricing assets and repricing liabilities in the event of changes in interest rates. - Basis risk, is the risk of loss due to the use of different interest rate indexes between assets and liabilities . - Positions held for the purpose of obtaining short-term profits from actual and/or potential price movements. - All debt securities with fixed or floating interest rates, and all financial instruments with similar characteristics, including tradable certificates of deposit (negotiable Certificates of Deposits) and marketable securities sold by BRI on repurchase terms (repo/Securities Lending). . - Bank Raya's foreign exchange position in the trading book and banking book exposed to exchange rate risk. b) Measurement 1. Market risk measurement is carried out periodically, simulating economic value of equity (eve) and net interest income (NII) on a regular basis or every time there is a change in market interest rates and arranging the maturity profile of securities. 2. The valuation of the trading book and banking book portfolios is carried out using quoted market prices of actively traded instruments (mark to market). The market price reflects actual and routine transactions carried out fairly. Valuation results based on market value (mark to market) are periodically validated to ensure consistency and fairness of market prices used. If the market price is not available because the instrument is not actively traded, the fair value determination valuation uses a price simulation approach (mark-to-model). 3. Performing market risk stress testing on a regular basis or in accordance with market conditions c) Monitoring and Control In carrying out the market risk management process, the Board of Directors routinely evaluates market risk through daily reports on net foreign exchange positions, the Asset & Liability Committee (ALCO) forum, risk Management Committee (RMC) and market risk exposure reports through the market risk profile dashboard.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	a) Pemisahan fungsi <i>front</i>, <i>middle</i> and <i>back office</i>. Fungsi manajemen risiko pasar terdiri dari unit kerja <i>front office</i> (<i>desk treasury</i>), <i>middle office</i> (<i>desk rmg</i>), dan <i>back office</i> (divisi operasional) dengan masing-masing memiliki kewenangan sebagai berikut: 1. Jajaran <i>front office</i> berwenang melakukan transaksi instrumen keuangan dan bertanggung jawab memantau pergerakan harga pasar. 2. Jajaran <i>middle office</i> menetapkan dan memantau limit risiko pasar dan secara berkala memastikan data pasar (<i>market price</i>) yang digunakan untuk <i>mark-to market</i> (MTM). 3. Jajaran <i>back office</i> melakukan <i>settlement</i> transaksi <i>treasury</i> dan secara harian menetapkan harga pasar (mtm) pada akhir hari. Pelaksanaan delegasi kewenangan diwujudkan melalui penetapan limit transaksi secara berjenjang sesuai dengan kompetensi dan pengalaman. b) Bank Raya telah mengimplementasikan sistem aplikasi <i>treasury</i> (OSTS) yang merupakan suatu sistem yang terintegrasi yang digunakan oleh fungsi <i>front office</i>, <i>middle office</i> dan <i>back office</i>. Melalui aplikasi ini Bank Raya dapat melakukan pengukuran risiko pasar yang terintegrasi dengan proses transaksi harian. Selain melakukan <i>monitoring</i> eksposur risiko instrumen, BRI juga melakukan <i>monitoring</i> limit risiko pasar dan limit transaksi antara lain limit nominal transaksi <i>dealer</i>, <i>limit open position</i>, <i>limit Uncommitted Credit Line</i> (UCL), <i>cut loss limit</i>, <i>stop loss limit</i> dan limit lainnya. <i>Monitoring</i> dilakukan secara harian sehingga mempercepat penyediaan informasi terkini yang mendukung pengambilan keputusan oleh pejabat lini dan manajemen secara tepat waktu, terutama untuk instrumen yang termasuk ke dalam klasifikasi diperdagangkan/<i>trading</i>. c) Integrasi antara pelampauan limit risiko pasar dengan penilaian kinerja unit kerja bisnis.
Pilar 4 Internal control system Risk management	a) Separation of front, middle and back office functions. The market risk management function consists of the front office (<i>desk treasury</i>), middle office (<i>desk rmg</i>), and back office (operational division) with each having the following authorities: 1. The front office is authorized to transact financial instruments and is responsible for monitoring market price movements. 2. The middle office ranks and monitors market risk limits and periodically ensures market data (<i>market price</i>) used for <i>mark- to-market</i> (MTM). 3. The back office performs settlement of treasury transactions and sets the market price (mtm) at the end of the day. The implementation of delegation of authority is realized through setting transaction limits in stages according to competence and experience. b) Bank Raya has implemented a treasury application system (OSTS) which is an integrated system used by the front office, middle office and back office functions. Through this application, Bank Raya can perform market risk measurements that are integrated with daily transaction processes. In addition to monitoring instrument risk exposure, BRI also monitors market risk limits and transaction limits, including dealer transaction nominal limits, open position limits, uncommitted credit line (UCL) limits, cut loss limits, stop loss limits and other limits. Monitoring is carried out on a daily basis so as to accelerate the provision of up-to-date information that supports decision making by line officials and management in a timely manner, especially for instruments that are classified as traded/<i>traded</i>. c) Integration between exceeding market risk limits and evaluating the performance of business work units.

Risiko Likuiditas

Liquidity Risk

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	a) Pelaksanaan rapat pra ALCO dan b) Pelaksanaan pra RMC triwulanan yang membahas mengenai isu strategis terkait dengan pengelolaan risiko perusahaan c) Pelaksanaan ALCO setiap bulan
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	a) Implementation of pre ALCO meeting and b) Implementation of quarterly pre RMC which discusses strategic issues related to company risk management c) ALCO implementation every month

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	a) Tersedianya kebijakan pedoman pelaksanaan penerapan Manajemen risiko Likuiditas b) Tersedianya Kebijakan pengelolaan likuiditas yaitu pedoman pelaksanaan aktivitas <i>treasury</i> . c) Penetapan parameter Limit profil risiko Likuiditas
Pillar 2 Adequacy of Policies, procedures and Limits	a) Availability of policy guidelines for the implementation of Liquidity risk management b) Availability of liquidity management policies, namely guidelines for the implementation of treasury activities. c) Setting parameters Liquidity risk profile limits
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	a) Identifikasi, pengukuran dan pemantauan risiko melalui profil likuiditas bulanan. b) Pengukuran risiko likuiditas secara harian dengan menggunakan rasio-rasio likuiditas c) Pengendalian risiko melalui protokol <i>liquidity contingency plan</i> dan pelaksanaan uji coba secara berkala d) Melakukan <i>stress testing</i> risiko likuiditas
Pillar 3 Risk Management Process and Risk Management Information System	a) Identification, measurement and monitoring of risk through monthly liquidity profiles. b) Measurement of liquidity risk on a daily basis using liquidity ratios c) Risk control through a liquidity contingency plan protocol and periodic testing d) Performing liquidity risk stress testing
Pilar 4 Sistem pengendalian Intern Manajemen risiko	a) Evaluasi dan analisis Strategi pendanaan yang dilakukan melalui Forum ALCO dan kajian kajian risiko likuiditas b) Penetapan kewenangan pejabat dalam melakukan aktivitas pengelolaan likuiditas
Pillar 4 Internal control system Risk management	a) Evaluation and analysis of funding strategies carried out through the ALCO FORUM and liquidity risk assessment studies b) Determination of the authority of officials in conducting liquidity management activities

Operational Risk

Risiko Operasional

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	Pengawasan aktif Dewan Komisaris dan Direksi dilakukan melalui pelaksanaan forum <i>Risk Management Committee</i> (RMC) triwulanan yang membahas mengenai isu strategis terkait dengan pengelolaan risiko perusahaan, dalam rangka membahas potensi kejadian risiko, efektifitas kontrol, tindak lanjut, dan mitigasi risiko. Selain itu, Dewan Komisaris dan Direksi juga melakukan pemantauan atas tindak lanjut apabila terjadi pelanggaran limit risiko.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	Active supervision of the Board of Commissioners and the Board of Directors is carried out through the implementation of a quarterly Risk Management Committee (RMC) forum that discusses strategic issues related to corporate risk management, in order to discuss potential risk events, control effectiveness, follow-up, and risk mitigation. In addition, the Board of Commissioners and the Board of Directors also monitor the follow-up actions in the event of a risk limit being exceeded.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	Kelancaran aktivitas operasional dan bisnis Bank didukung oleh kebijakan dan prosedur yang jelas untuk setiap produk dan aktivitas Bank, termasuk penetapan Limit approval untuk transaksi yang diberikan berjenjang. Pengelolaan risiko operasional berpedoman <i>Risk Appetite Statement</i> dan limit risiko yang telah ditetapkan untuk setiap parameter risiko operasional.
Pillar 2 Adequacy of Policies, procedures and Limits	The smooth running of the Bank's operational and business activities is supported by clear policies and procedures for each of the Bank's products and activities, including setting approval limits for tiered transactions. Operational risk management is guided by the risk appetite Statement and risk limits that have been set for each operational risk parameter.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	Proses penerapan Manajemen risiko operasional dilakukan melalui tahapan identifikasi, pengukuran, pemantauan, dan pengendalian risiko, sebagai berikut: - Identifikasi risiko operasional dilakukan melalui penetapan risk issue di setiap aktivitas fungsional Bank yang dilakukan masing-masing Unit Kerja selaku <i>risk owner</i>. - Pengukuran risiko operasional dilakukan di setiap Unit Kerja melalui metode <i>Risk Control Self Assessment</i> (RCSA) - Pengendalian risiko dilakukan antara lain melalui: - Penetapan dan <i>monitoring</i> rencana tindak Lanjut atas setiap kejadian risiko operasional hasil pengukuran RCSA <i>Risk Control Self Assessment</i> (rcsa) atas setiap produk dan aktivitas baru yang dilakukan oleh <i>product owner</i> dan penilaian Kecukupan pengelolaan risiko untuk setiap produk dan aktivitas baru yang dilakukan oleh Satuan Kerja Manajemen risiko. - Protokol <i>Business Continuity Management</i> untuk kejadian yang bersifat katastrofik. Tim Manajemen Krisis (TMK) berperan dan bertanggung jawab dalam menetapkan langkah-langkah yang akan diambil dalam kondisi bencana. Struktur tmk dibentuk di seluruh Unit Kerja BRI yang meliputi TMK Kantor pusat, dan TMK Kantor Cabang. - Manajemen Insiden (MI)/Loss event Database (LED) Merupakan <i>database</i> insiden/kerugian risiko operasional yang bertujuan untuk mengelola risiko operasional yang dihadapi beserta pengelolaannya melalui dokumentasi dan pemantauan <i>progress</i> pelaksanaan rencana perbaikan yang dilakukan. Sistem Informasi ini juga merupakan sumber data dalam mensimulasikan beban modal untuk risiko operasional.
Pillar 3 Risk Management Process and Risk Management Information System	The process of implementing operational risk management is carried out through the stages of identification, measurement, monitoring, and risk control, as follows: - Operational risk identification is carried out through the determination of risk issues in each of the Bank's functional activities carried out by each Work Unit as the risk owner. - Operational risk measurement is carried out in each Work Unit through the Risk Control Self - assessment method (RCSA) - Risk control is carried out, among others, through: - Determination and monitoring of follow-up plans for each operational risk event resulting from RCSA MEASUREMENTS - Risk Control Self-assessment (RCSA) for each new product and activity carried out by the product owner and an assessment of the adequacy of risk management for each new product and activity carried out by the Risk Management Unit. - catastrophic events . The Crisis Management Team (TMK) plays a role and is responsible for determining the steps to be taken in a disaster situation. The TMK structure was established in all BRI Work Units, which includes TMK at the head office, and TMK AT Branch Offices. - Incident Management (MI)/Loss Event Database (LED) Is an operational risk incident/loss database that aims to manage operational risks faced and their management through documentation and monitoring of progress in the implementation of the improvement plans. This information system is also a source of data in simulating capital costs for operational risk.
Pilar 4 Sistem pengendalian Intern Manajemen risiko	- Pemisahan fungsi <i>Maker-Checker-Signer</i> dalam aktivitas operasional perbankan, dimana <i>approval</i> sebagian besar proses operasional telah <i>embedded</i> dalam sistem <i>Core Banking</i>. - Pelaporan profil risiko operasional Bank kepada Dewan Komisaris dan Direksi secara rutin - Kaji ulang terhadap penerapan Manajemen risiko operasional secara rutin.
Pillar 4 Internal control system Risk management	- Separation of Maker-Checker-Signer functions in banking operational activities , where approval of most operational processes has been embedded in the Core Banking system. - Reporting the Bank's operational risk profile to the Board of Commissioners and Directors on a regular basis - Review the implementation of operational risk management on a regular basis.

Risiko Kepatuhan

Risiko yang disebabkan bank tidak mematuhi atau tidak melaksanakan peraturan perundang-undangan dan ketentuan lain yang berlaku. pengelolaan risiko kepatuhan dilakukan melalui penerapan sistem pengendalian intern secara konsisten.

Compliance Risk

It is a risk caused by the bank not complying with or not implementing the laws and regulations and other applicable provisions. Compliance risk management is carried out through consistent implementation of the internal control system.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	Pembahasan mengenai profil risiko kepatuhan dan pengelolaan risiko kepatuhan dan tindak lanjutnya dibahas dalam RMC dan rapat KPMR.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	Discussions on compliance risk profile and compliance risk management and their follow-up are discussed in the RMC and KPMR MEETINGS.
Pillar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	Kebijakan dan prosedur manajemen risiko Kepatuhan, antara lain: a) Pelaksanaan Fungsi Kepatuhan terhadap rencana Kebijakan dan/ atau Keputusan BRI oleh Direktur Kepatuhan dan Jajaran Satuan Kerja Kepatuhan PT Bank Rakyat Indonesia Agroniaga, Tbk b) Penerapan Budaya Kepatuhan di Unit Kerja c) Kebijakan dan prosedur penerapan anti pencucian Uang (APU) dan pencegahan pendanaan terorisme (PPT) d) Kebijakan tentang Benturan Kepentingan e) Kebijakan tentang Kode etik f) Kebijakan tentang program pengendalian Gratifikasi g) Kebijakan tentang <i>Whistleblowing System</i> h) Bagian Kepatuhan sebagai koordinator risiko kepatuhan melakukan uji prinsip kehati-hatian terhadap seluruh kebijakan internal Bank Raya yang ditetapkan oleh Direksi.
Pillar 2 Adequacy of Policies, procedures and Limits	Compliance risk management policies and procedures, including: a) Implementation of the Compliance Function on the Policy plan and/or BRI Decisions by the Director of Compliance and the Compliance Work Unit at PT Bank Rakyat Indonesia agroniaga, tbk b) Implementation of Compliance Culture in Work Units c) Policies and procedures for the application of anti-money laundering (APU) and prevention of terrorism financing (PPT) d) Policy on Conflicts of Interest e) Policy on Code of Ethics f) Policy on Gratification control program g) Policy on Whistleblowing System h) The Compliance Division as the coordinator of compliance risk conducts a prudential principle test on all Bank Raya internal policies set by the Board of Directors.
Pillar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	a) Melakukan identifikasi risiko kepatuhan melalui laporan profil risiko b) Proses manajemen risiko kepatuhan didukung dengan sistem informasi yang memadai antara lain: c) Aplikasi AML (<i>anti Money Laundering</i>) digunakan untuk <i>monitoring suspicious transaction</i>. Digunakan untuk melakukan proses pengujian dan <i>monitoring progress</i> pengujian d) Pengelolaan risiko kepatuhan menjadi bagian dari tugas dan tanggung jawab dari Fungsi Manajemen risiko yang mengkoordinir pelaksanaan Manajemen risiko untuk 8 jenis risiko termasuk risiko kepatuhan. e) Sumber daya manusia yang ditunjuk untuk mengelola risiko kepatuhan memiliki kompetensi yang memadai dan mendapatkan pendidikan yang sesuai dengan level jabatan.
Pillar 3 Risk Management Process and Risk Management Information System	a) Identify compliance risk through risk profile reports b) The compliance risk management process is supported by an adequate information system, including: c) The AML (<i>anti Money Laundering</i>) application is used for monitoring suspicious transactions. Used to carry out the testing process and monitoring test progress d) Compliance risk management is part of the duties and responsibilities of the Risk Management Function which coordinates the implementation of risk management for 8 types of risk including compliance risk. e) Human resources appointed to manage compliance risk have adequate competence and receive education appropriate to the level of position.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	Pelaksanaan kaji ulang <i>independent (independent review)</i> oleh Satuan Kerja <i>audit Intern</i> (SKAI) dilakukan secara berkala terhadap Kualitas penerapan Manajemen risiko Kepatuhan. Bagian Kepatuhan secara aktif mensosialisasikan dampak terhadap regulasi baru terhadap bisnis maupun operasional perusahaan.
Pillar 4 Internal control system Risk management	Implementation of an independent review by the Internal Audit Unit (SKAI) is carried out periodically on the quality of the implementation of Compliance Risk Management. The Compliance Department actively socializes the impact of the new regulations on the company's business and operations.

Risiko Hukum

Legal Risk

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	Pengawasan aktif Dewan Komisaris dan Direksi dilakukan melalui pelaksanaan forum <i>Risk Management Committee</i> (RMC) triwulanan yang dapat berupa pembahasan mengenai kasus hukum yang material serta pengelolaan risiko hukum dan tindak lanjutnya. Selain itu, pengawasan aktif Dewan Komisaris juga dilakukan melalui rapat kpmr.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	Active supervision of the Board of Commissioners and the Board of Directors is carried out through the implementation of a quarterly <i>Risk Management Committee</i> (RMC) forum which can take the form of discussions on material legal cases as well as legal risk management and follow-up actions. In addition, the active supervision of the Board of Commissioners is also carried out through kpmr meetings.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	a) Bagian Hukum telah menyusun pedoman Hukum yang disosialisasikan ke seluruh Unit Kerja. b) Parameter dan limit risiko hukum telah ditetapkan dan di-review secara berkala setiap tahun
Pillar 2 Adequacy of Policies, procedures and Limits	a) The Legal Division has compiled Legal guidelines which are disseminated to all Work Units. b) Legal risk parameters and limits have been determined and reviewed regularly every year
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	a) Setiap proses transaksi maupun produk dan aktivitas baru yang memiliki potensi risiko hukum ditelaah lebih dulu oleh Divisi <i>Legal & Compliance</i> melalui Bagian Hukum. b) <i>Monitoring</i> risiko Hukum terhadap seluruh Unit Kerja operasional di Indonesia dilakukan oleh <i>Legal officer</i> Kantor pusat c) <i>Legal officer</i> di Kantor pusat akan melakukan pendampingan hukum sesuai dengan kewenangannya apabila terjadi kasus hukum di Unit Kerja operasional.
Pillar 3 Risk Management Process and Risk Management Information System	a) Every transaction process as well as new products and activities that have potential legal risks are reviewed by the Legal & Compliance Division through the Legal Division. b) Legal risk monitoring for all operational Work Units in Indonesia is carried out by the Head Office Legal officer c) Legal officers at the head office will provide legal assistance in accordance with their authority in the event of a legal case in the operational work unit.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	Divisi <i>Legal & Compliance</i> melalui Bagian Hukum secara aktif mensosialisasikan modus operasi kejahatan berikut prosedur penanganannya secara hukum untuk meminimalkan risiko hukum di Unit Kerja operasional. Pengendalian risiko Hukum dilakukan melalui beberapa cara antara lain: - Divisi <i>Legal & Compliance</i> melalui Bagian Hukum sebagai koordinator risiko Hukum di Bank Raya melakukan kajian terhadap perubahan peraturan perundang-undangan untuk memastikan bahwa ketentuan internal Bank Raya tidak menyimpang dari ketentuan perundangan yang berlaku. - Divisi <i>Legal & Compliance</i> melalui Bagian Hukum melalui memberikan <i>advis/opini</i> hukum atas perjanjian kerjasama (PKS)/<i>agreement</i> antara Bank Raya dengan pihak lain, untuk melindungi kepentingan hukum BRI sebelum perjanjian/<i>agreement</i> ditandatangani oleh pejabat Bank Raya yang berwenang. - Setiap transaksi perbankan di Bank Raya yang meliputi operasional, perkreditan dan hubungan ketenagakerjaan telah dilakukan sesuai dengan ketentuan perundang-undangan yang berlaku dan didukung oleh dokumen hukum yang memadai - Divisi <i>Legal & Compliance</i> melalui Bagian Hukum bekerja sama dengan <i>legal officer</i> di Unit Kerja memantau risiko hukum dengan mekanisme pelaporan dan dokumentasi kasus-kasus hukum serta mensosialisasikan modus operasi kejahatan berikut prosedur penanganannya secara hukum untuk meminimalkan risiko hukum. - Divisi <i>Legal & Compliance</i> melalui Bagian Hukum melalui menyusun pedoman-pedoman hukum misalnya pedoman penyusunan PKS dan buku saku hukum baik untuk bidang operasional maupun bidang perkreditan. - Pembinaan staf pada Unit Kerja Operasional (UKO) di Kantor Cabang/Capem dilakukan dengan cara meningkatkan kompetensi dalam mengendalikan risiko hukum di wilayah kerja yang bersangkutan diantaranya berupa sosialisasi, diskusi mengenai opini atas suatu kejadian dari sisi hukum yang berlaku. - Apabila diperlukan, UKO dapat berkonsultasi dengan Divisi <i>Legal & Compliance</i> melalui Bagian Hukum mengenai permasalahan permasalahan hukum yang bersifat teknis. - Dalam hal adanya tuntutan hukum yang memiliki potensi kerugian sangat signifikan bagi Bank dan atau adanya tuntutan hukum yang secara signifikan bisa berdampak negatif pada reputasi Bank Raya, maka sebagai <i>contingency plan</i> harus dilakukan tindakan untuk mengurangi risiko hukum, antara lain melalui: penggunaan jasa pengacara dan melaporkan perkembangannya kepada Direksi. - Sebagai bagian dari pemantauan terhadap risiko hukum, Divisi <i>Legal & Compliance</i> melalui Bagian Hukum berkoordinasi dengan Divisi <i>Risk Management</i> melalui Bagian <i>Map</i> terkait dengan pelaporan profil risiko hukum BRI setiap bulan kepada Direksi melalui <i>Dashboard</i> profil risiko - Kaji ulang terhadap penerapan Manajemen risiko Hukum dilakukan secara rutin. Upaya lain yang dilakukan dalam rangka meningkatkan kesadaran risiko hukum.
Pillar 4 Internal control system Risk management	The Legal & Compliance Division through the Legal Division actively disseminates the modus operandi of crime and its legal handling procedures to minimize legal risks in operational work units. Legal risk control is carried out in several ways, including: - The Legal & Compliance Division through the Legal Division as the coordinator of Legal risk at Bank Raya conducts a review of changes to laws and regulations to ensure that Bank Raya's internal regulations do not deviate from the prevailing laws and regulations. - The Legal & Compliance Division through the Legal Division provides legal advice/opinions on cooperation agreements (PKS)/agreements between Bank Raya and other parties, to protect BRI's legal interests before the agreement/agreement is signed by authorized Bank Raya officials. - Every banking transaction at Bank Raya which includes operations, credit and employment relations has been carried out in accordance with the prevailing laws and regulations and is supported by adequate legal documents. - The Legal & Compliance Division through the Legal Division cooperates with legal officers in the Work Unit to monitor legal risks with a mechanism for reporting and documenting legal cases and socializing the modus operandi of crimes and their legal handling procedures to minimize legal risks. - The Legal & Compliance Division through the Legal Division has developed legal guidelines, such as guidelines for the preparation of PKS and legal pocket books for both the operational and credit sectors.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
	f) Staff development in operational work units (uko) at branch offices/sub-districts is carried out by increasing competence in controlling legal risk in the work area concerned, including in the form of socialization, discussion of opinions on an incident in terms of the applicable law. g) If necessary, uko can consult with the Legal & Compliance Division through the Legal Department regarding technical legal issues. h) In the event that there is a lawsuit that has the potential for very significant losses for the Bank and or there is a lawsuit that could significantly have a negative impact on the reputation of Bank Raya, then as a contingency plan, actions must be taken to reduce legal risk, among others through: using the services of a lawyer and reporting progress to the Board of Directors. i) As part of monitoring legal risks, the Legal & Compliance Division through the Legal Division coordinates with the Risk Management Division through the Fools' Division regarding the monthly reporting of BRI's legal risk profile to the Board of Directors through the Risk Profile Dashboard. j) Review of the implementation of Legal risk management is carried out on a regular basis. Other efforts are made in order to increase awareness of legal risks.

Risiko Strategik

Strategic Risk

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pillar 1 Pengawasan aktif Dewan Komisaris dan Direksi	Pembahasan mengenai perencanaan strategi, <i>monitoring</i> pencapaian target dan evaluasi strategi dibahas dalam rapat Gabungan Dewan Komisaris dengan Direksi (radirkom) pada saat pembahasan mengenai persetujuan RBB, persetujuan RKAP, dan pembahasan kinerja keuangan triwulanan. Materi rapat Kerja nasional (rakernas) yang diadakan setiap tahun untuk mendukung proses formulasi strategi juga dibahas dalam forum rapat Direksi. Selain itu, rapat Komite Direksi seperti ALCO juga membahas pencapaian kinerja dan upaya pencapaian kinerja keuangan.
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	Discussions on strategic planning, monitoring of target achievement and evaluation of strategies were discussed in the Joint Meeting of the Board of Commissioners and the Board of Directors (radirkom) during discussions regarding rbb approval, RKAP approval, and quarterly financial performance discussions. The material for the annual National Working Meeting (Rakernas) to support the strategy formulation process is also discussed in the Board of Directors meeting forum. In addition, Board of Directors Committee meetings such as ALCO also discuss performance achievements and efforts to achieve financial performance.
Pillar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	Proses perencanaan, <i>monitoring</i> dan evaluasi strategi perusahaan tertuang dalam DUJ maupun BPO Divisi <i>Change Management</i> dan Divisi operasional.
Pillar 2 Adequacy of Policies, procedures and Limits	The process of planning, monitoring and evaluating the company's strategy is contained in the DUJ and BPO, Change Management Division and Operational Division.
Pillar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	Penyelenggaraan <i>Joint planning session</i> pada saat penyusunan RBB dalam rangka pembahasan strategi bisnis beserta rencana program kerja masing-masing Unit Kerja Divisi di Kantor pusat. <i>Monitoring Strategic Initiatives</i> perusahaan oleh Unit Kerja <i>Project Management Office</i> dan Divisi <i>Change Management</i> . <i>Strategic Initiatives</i> yang dimaksud adalah program kerja non rutin yang bersifat sangat strategis dan <i>critical</i> , yang harus dilakukan agar suatu target unit kerja dapat tercapai.
Pillar 3 Risk Management Process and Risk Management Information System	Organising a Joint planning session during the preparation of the RBB in the context of discussing business strategies and the work program plans of each Divisional Work Unit at the head office. Monitoring the company's Strategic Initiatives by the Project Management office in the Change Management Division. Strategic Initiatives in question are non-routine work programs that are very strategic and critical, which must be carried out so that a work unit target can be achieved.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	Apabila terdapat realisasi program kerja suatu Uker masih <i>behind schedule</i> akibat keterkaitan dengan Uker lain, akan dilakukan penyesuaian/akselerasi program kerja ke Uker yang dimintakan <i>support</i> . Penyesuaian dan akselerasi program kerja tersebut dimonitor oleh Divisi <i>Change Management</i> .
Pilar 4 Internal control system Risk management	If there is a realization that the work program of a Uker is still behind schedule due to linkages with other Uker, there will be an alignment/acceleration of the work program to the Uker requested for support. The alignment and acceleration of the work program is monitored by the Change Management Division.

Risiko Reputasi

Merupakan risiko yang antara lain disebabkan adanya publikasi negatif yang terkait dengan kegiatan usaha Bank atau persepsi negatif terhadap Bank.

Reputational Risk

This is a risk which is caused by, among other things, negative publications related to the Bank's business activities or negative perceptions of the Bank.

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	Pembahasan mengenai profil risiko reputasi dan pengelolaan risiko reputasi beserta tindak lanjutnya dibahas dalam RMC, dan rapat KPMR.
Pilar 1 Active supervision of the Board of Commissioners and the Board of Directors	Discussions on the reputation risk profile and reputation risk management and their follow-up are discussed in the RMC and KPMR meetings.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	Dalam rangka pengendalian risiko reputasi telah ditunjuk Divisi Sekretaris Perusahaan (SKP) untuk menangani setiap informasi negatif. Proses pengelolaan risiko reputasi tertuang dalam DUJ maupun BPO Divisi Sekretariat perusahaan. prosedur penanganan aduan (<i>Complaint Handling</i>) dengan <i>sla</i> tertentu.
Pilar 2 Adequacy of Policies, procedures and Limits	In order to control reputational risk, a Corporate Secretary Division (skp) has been appointed to handle any negative information. The reputation risk management process is contained in the DUJ and BPO Division of the Company's Secretariat. Complaint Handling procedures with certain <i>sla</i> .
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	a) Kegiatan identifikasi risiko reputasi yang dilakukan secara berkala oleh Divisi SKP dengan melihat jumlah pemberitaan negatif terhadap Bank Raya, jumlah keluhan nasabah di media massa baik cetak maupun elektronik, <i>call center</i> dan rating perusahaan. Setelah proses identifikasi akan dilakukan pengukuran terhadap risiko reputasi untuk menilai kategori risiko reputasi dengan menggunakan beberapa parameter sesuai dengan limit parameter dalam Laporan profil risiko reputasi. b) Pemantauan risiko yang dilakukan oleh Divisi SKP yaitu dengan melakukan <i>monitoring</i> secara berkala terhadap jumlah keluhan dan pemberitaan negatif di media massa dan melaporkan dalam profil risiko reputasi. c) Parameter dan limit risiko reputasi telah ditetapkan dan di-review secara berkala setiap tahun.
Pilar 3 Risk Management Process and Risk Management Information System	a) Reputation risk identification activities are carried out regularly by the skp division by looking at the number of negative reports on Bank Raya, the number of customer complaints in the mass media both print and electronic, call centers and company ratings. After the identification process, reputation risk will be measured to assess the reputation risk category using several parameters in accordance with the parameter limits in the reputation risk profile report. b) Risk monitoring carried out by the skp division is by periodically monitoring the number of complaints and negative reports in the mass media and reporting in the reputation risk profile. c) Reputation risk parameters and limits have been set and reviewed regularly every year

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	Pelaksanaan kaji ulang <i>independent</i> (<i>independent review</i>) oleh Satuan Kerja audit Intern (SKAI) dilakukan secara berkala terhadap Kualitas penerapan Manajemen risiko reputasi.
Pillar 4 Internal control system Risk management	The implementation of an independent review by the Internal Audit Unit (SKAI) is carried out periodically on the quality of the implementation of reputation risk management.

Berikut tabel eksposur risiko Bank Raya di sepanjang tahun 2021
berdasarkan penilaian OJK

The following is a table of Bank Raya's risk exposure throughout 2021
Based on OJK assessment

NO.	Jenis Risiko Risk Type	Penilaian Tingkat Risiko Risk Level Assessment		Tingkat Risiko Risk Level
		Tingkat Risiko Inherent Inherent Risk Level	Tingkat KPMR KPMR Rate	
1.	Risiko Kredit Credit Risk	Moderate Peringkat 3 Moderate Rank 3	Fair Peringkat 3 Fair Rank 3	Moderate Peringkat 3 Moderate Rank 3
2.	Risiko Pasar Market Risk	Low to Moderate Peringkat 2 Low to Moderate Rank 2	Satisfactory Peringkat 2 Satisfactory Rank 2	Low to Moderate Peringkat 2 Low to Moderate Rank 2
3.	Risiko Likuiditas Liquidity Risk	Low to Moderate Peringkat 2 Low to Moderate Rank 2	Satisfactory Peringkat 2 Satisfactory Rank 2	Low to Moderate Peringkat 2 Low to Moderate 2nd
4.	Risiko Operasional Operational Risk	Low to Moderate Peringkat 2 Low to Moderate Rank 2	Satisfactory Peringkat 2 Satisfactory Rank 2	Low to Moderate Peringkat 2 Low to Moderate 2nd
5.	Risiko Hukum Legal Risk	Low to Moderate Peringkat 2 Low to Moderate Rank 2	Satisfactory Peringkat 2 Satisfactory Rank 2	Low to Moderate Peringkat 2 Low to Moderate 2nd
6.	Risiko Strategik Strategic Risk	Moderate Peringkat 3 Moderate Rank 3	Low to Moderate Peringkat 2 Low to Moderate Rank 2nd	Low to Moderate Peringkat 2 Low to Moderate 2nd
7.	Risiko Kepatuhan Compliance Risk	Low Peringkat 2 Low Rank 2	Fair Peringkat 2 Fair Rank 2	Low to Moderate Peringkat 2 Low to Moderate 2nd
8.	Risiko Reputasi Reputational Risk	Low Peringkat 1 Low Rank 1	Satisfactory Peringkat 2 Satisfactory Rank 2nd	Low Peringkat 1 Low Rank 1
Peringkat Komposit Profil Risiko Risk Profile Composite Rating		Low to Moderate	Satisfactory	Low to Moderate Peringkat 2 Low to Moderate 2nd

Penilaian OJK atas Profil Risiko di triwulan IV 2021 secara komposit
berada di peringkat 2 "Low to Moderate".

The Risk Profile's composite self-assessment for the fourth quarter
of 2021 is graded 2 "Low to Moderate."

Pembelian Kembali (*Buyback*) Saham Dan Obligasi Bank Raya

Bank Raya Share and Bond Buyback

Selama tahun 2021 Bank Raya tidak melakukan *Buyback* atas saham dan obligasi yang diterbitkan.

During 2021, Bank Raya did not conduct *Buyback* on issued shares and bonds.

Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme

Anti Money Laundering and Terrorism Financing Prevention Program

Kemajuan teknologi di perbankan dan ragam kemudahan transaksi yang ditawarkan perbankan memiliki tujuan utama untuk meningkatkan layanan produk dan jasa keuangan bagi nasabah, namun hal tersebut dapat disalahgunakan oleh orang yang tidak bertanggung jawab / pelaku kejahatan untuk mengaburkan asal usul sumber dana maupun keberadaan dana melalui serangkaian transaksi sebagai upaya melakukan pencucian uang, maupun mendukung aktivitas pendanaan terorisme.

Technological advances in banking and the variety of transaction conveniences offered by banks have the main objective of improving financial product and service services for customers, but these can be misused by irresponsible people / criminals to obscure the origin of the source of funds and the existence of funds through a series of transactions. as an effort to carry out money laundering, as well as to support terrorism financing activities.

Dampak negatif yang ditimbulkan dari tindak pidana pencucian Uang (*money laundering*), antara lain sebagai berikut:

1. Mempersulit pengendalian moneter, mengurangi pendapatan negara dan meningkatnya *country risk*.
2. Menimbulkan *high cost economy* dan mengganggu persaingan usaha.
3. Menimbulkan permasalahan sosial politik yang terkait dengan banyaknya uang haram yang dipakai dalam interaksi sosial politik.
4. Mengakibatkan tidak berjalannya sistem hukum dengan baik sehingga mengurangi kepastian hukum yang penting bagi semua orang dalam berbagai kasus yang terjadi, Dimana Tindak Pidana Pencucian Uang (TPPU) paling dominan dilakukan melalui sistem keuangan.

The negative impacts arising from the crime of money laundering include the following:

1. Complicates monetary control, reduces state revenues, and increases country risk.
2. Creates a high cost economy and disrupts business competition.
3. Causes socio-political problems related to the amount of illicit money used in socio-political interactions.
4. As a result, the legal system does not work properly, thereby reducing legal certainty which is important for everyone in the various cases that occur, where the most dominant crime of money laundering is carried out through the financial system.

Sedangkan untuk tindak pidana terorisme, dilakukan untuk mengintimidasi, menggunakan ancaman kekerasan yang menimbulkan rasa takut atau teror secara luas dengan target sasaran aparat penegak hukum, aparat pemerintahan atau masyarakat sipil secara acak atau tidak terseleksi. Serta obyek vital yang strategis, fasilitas umum, dan lain-lain yang bertujuan membahayakan keamanan dan kedaulatan negara.

As for the criminal act of terrorism, it is carried out to intimidate, use threats of violence that cause fear or terror widely by targeting law enforcement officers, government officials or civil society at random or not selected. As well as strategic vital objects, public facilities, and others that aim to endanger the security and sovereignty of the state.

Sebagai perbankan yang taat terhadap ketentuan perundang-undangan Bank Raya menerapkan program anti pencucian Uang dan pencegahan pendanaan terorisme (APU dan PPT), melalui kegiatan identifikasi, verifikasi pemantauan kegiatan transaksi keuangan nasabah dan pelaporan transaksi keuangan nasabah yang dianggap mencurigakan atau terkait kegiatan terorisme. penerapan program APU dan PPT berpedoman pada Undang-Undang No. 8 tahun 2010 tentang pencegahan dan pemberantasan tindak pidana pencucian Uang, dan Undang-Undang No.9 tahun 2013 tentang

As a bank that complies with statutory provisions, Bank Raya implements anti-money laundering and terrorism financing prevention programs (APU and PPT), through identification, verification, monitoring of customer financial transaction activities and reporting of customer financial transactions deemed suspicious or related to terrorist activities. the application of the APU and PPT programs is guided by Law no. 8 of 2010 concerning the prevention and eradication of the crime of money laundering, and Law no. 9 of 2013 concerning the prevention and eradication of criminal acts of

pencegahan dan pemberantasan tindak pidana terorisme, serta Peraturan OJK No. 23/POJK.01/2019 tentang perubahan atas Peraturan OJK No. 12/POJK.01/2017 tentang penerapan program anti pencucian Uang dan pencegahan pendanaan terorisme di Sektor Jasa Keuangan.

terrorism, as well as OJK Regulation No. 23/POJK.01/2019 regarding changes to OJK Regulation No. 12/POJK.01/2017 concerning the implementation of anti-money laundering and prevention of terrorism financing programs in the Financial Services Sector.

Kebijakan APU & PPT

APU & PPT Policy

Berdasarkan Peraturan OJK No. 23/POJK.01/2019 tentang perubahan atas Peraturan OJK No. 12/POJK.01/2017 tentang penerapan program anti pencucian Uang dan pencegahan pendanaan terorisme di Sektor Jasa Keuangan, maka Bank Raya telah menerbitkan Surat Keputusan Direksi Bank Raya No. Kpts B.24-DIR.03.04/ LCA/03/2020 tanggal 20 Maret 2020 tentang pedoman pelaksanaan anti pencucian Uang dan pencegahan pendanaan terorisme PT Bank Raya Indonesia Tbk . yang mengatur tentang 5 (lima) pilar penerapan APU dan PPT, sebagai berikut:

1. Pengawasan aktif Direksi dan Dewan Komisaris;
2. Kebijakan dan prosedur;
3. Pengendalian Intern;
4. Sistem Manajemen Informasi (SIM); dan
5. Sumber Daya Manusia (SDM) dan pelatihan

Based on OJK Regulation No. 23/POJK.01/2019 regarding changes to OJK Regulation No. 12/POJK.01/2017 concerning the implementation of anti-money laundering and terrorism financing prevention programs in the Financial Services Sector, Bank Raya has issued a Decree of the Board of Directors of Bank Raya No. Kpts B.24-DIR.03.04/ L CA /03/2020 dated March 20, 2020 regarding guidelines for the implementation of anti-money laundering and prevention of terrorism financing of PT Bank Raya Indonesia Tbk. which regulates the 5 (five) pillars of APU and PPT implementation, as follows:

1. Active supervision of the Board of Directors and the Board of Commissioners;
2. Policies and procedures;
3. Internal Control;
4. Information Management System (MIS); and
5. Human Resources (HR) and training

Pihak yang Menangani APU & PPT

APU & PPT Handling Party

Unit Kerja Khusus (UKK) di Bank Raya yang bertanggung jawab terhadap penerapan program APU dan PPT, yaitu Divisi *Legal & Compliance*/Bagian *anti Money Laundering*.

The Special Work Unit (UKK) at Bank Raya is responsible for the implementation of the AML and CFT programs , namely the Legal & Compliance Division / Anti-Money Laundering Division.

Pelaksanaan Program APU & PPT di Tahun 2021

APU & PPT Program Implementation in 2021

Di tahun 2021, pelaksanaan Program APU & PPT di Bank Raya adalah sebagai berikut:

1. Melakukan sosialisasi dan/atau pelatihan penerapan APU dan PPT terhadap Pekerja yang berinteraksi dengan Nasabah, Pengawas/Auditor yang melakukan pengawasan penerapan APU dan PPT, serta Pekerja baru.
2. Melakukan *monitoring* dan/atau pembinaan ke Unit Kerja Operasional Bank Raya untuk melakukan evaluasi tingkat kepatuhan dan pemahaman terhadap penerapan program APU dan PPT.

In 2021, the implementation of the AML & CFT Program at Bank Raya is as follows:

1. Conducting socialisation and/or training on the implementation of APU and PPT for Workers who interact with Customers, Supervisors/Auditors who supervise the implementation of APU and PPT, as well as new employees.
2. Monitoring and/or coaching to Bank Raya Operational Units to evaluate the level of compliance and understanding of the implementation of the APU and PPT programs.

3. Memenuhi permintaan informasi/data keuangan dari pihak regulator dan/atau Aparat Penegak Hukum terkait kasus tindak pidana pencucian uang dan/atau pendanaan terorisme. 4. Melakukan analisa dan menyusun laporan terkait penerapan APU dan PPT kepada PPATK, sebagai berikut : a. Laporan Transaksi Keuangan Tunai (<i>Cash Transaction Report/CTR</i>); b. Laporan Transaksi Keuangan mencurigakan (<i>Suspicious Transaction Report/STR</i>); c. Laporan Transaksi keuangan transfer dana dari dan keluar negeri (<i>International Fund Transfer Instruction/IFTI</i>); dan d. Laporan Sistem Informasi Pengguna Jasa Terpadu (SIPESAT). 5. Memonitor pelaksanaan pengkinian data nasabah. 6. Memonitor transaksi nasabah yang memenuhi kriteria sebagai <i>Politically Exposed Person</i> (PEP), serta memonitor kesesuaian dengan data pihak yang berstatus tersangka/terdakwa, termasuk dalam Daftar Terduga Teroris dan Organisasi Teroris (DTTOT) dan Daftar Pendanaan Proliferasi Senjata Pemusnah Massal (DPPSPM). 7. Melakukan pengembangan sistem/aplikasi pendukung penerapan APU dan PPT 8. Mengimplementasikan ISO 9001:2015 Sistem Manajemen Mutu	3. Fulfilling requests for financial information/data from regulators and/or Law Enforcement Officials related to cases of money laundering and/or terrorism financing. 4. Analysing and compiling reports related to the application of APU and PPT to PPATK, as follows: a. Cash Transaction Report (CTR); b. Suspicious Transaction Report (STR); c. Report on financial transactions of funds transfer from and abroad (International Fund Transfer Instruction/IFTI); and d. Integrated Service User Information System Report (SIPESAT). 5. Monitoring the implementation of updating customer data. 6. Monitoring customer transactions that meet the criteria as a Politically Exposed Person (PEP), as well as monitor compliance with data on parties with the status of suspects/defendants, including the List of Suspected Terrorists and Terrorist Organizations (DTTOT) and the List of Funding for the Proliferation of Weapons of Mass Destruction (DPPSPM). 7. Developing systems/applications supporting the application of APU and PPT 8. Implementing ISO 9001:2015 Quality Management System

Pemberian Dana Untuk Kegiatan Sosial dan Politik

Provision of Funds for Social and Political Activities

Kebijakan internal Bank melarang keterlibatan Bank termasuk pekerja dalam kegiatan politik, termasuk memberikan dana untuk kepentingan politik. Kebijakan ini diterapkan guna menjaga independensi dan profesionalisme Bank dan pekerja.

Dalam hal kegiatan sosial, Bank meyakini bahwa kegiatan sosial memberi dampak positif kepada khalayak yang lebih luas untuk jangka panjang. Pelaksanaan kegiatan sosial dilaporkan dalam bagian khusus tentang tanggung Jawab Sosial Perusahaan dalam Laporan Tahunan ini.

The Bank's internal policy prohibits the involvement of the Bank, including employees, in political activities, including providing funds for political purposes. This policy is implemented to maintain the independence and professionalism of the Bank and employees.

In terms of social activities, the Bank believes that social activities have a positive impact on a wider audience in the long term. The implementation of social activities is reported in a special section on Corporate Social Responsibility in this Annual Report.

Penyediaan Dana Kepada Pihak Terkait dan Penyediaan Dana Besar

Provision of Capital to Related Parties and Provision of Significant Capital

Penyediaan dana kepada pihak terkait oleh Bank (termasuk Dewan Komisaris, Direksi, dan pihak terkait lainnya) dilakukan secara wajar dan sesuai harga pasar dengan persyaratan komersial normal. Penyediaan Dana kepada pihak terkait dilaksanakan dengan mengacu kepada POJK No.32/POJK.03/2018 tentang Batas Maksimum Pemberian Kredit (BMPK) dan Penyediaan Dana Besar Bagi Bank Umum dan ketentuan internal Bank.

The Bank provides money to connected parties (including the Board of Commissioners, Directors, and other related parties) equitably and on standard commercial conditions. Provision of funds to related parties is governed by POJK No.32/POJK.03/2018 on Maximum Lending Limits (BMPK) and Provision of Large Funds for Commercial Banks, as well as the Bank's internal policies.

Bank menyampaikan laporan Penyediaan Dana, Penyediaan Dana Besar, Pengecualian Penyediaan Dana Besar, Pelanggaran BMPK atau Pelampauan BMPK, secara individu dan secara konsolidasi kepada Otoritas Jasa Keuangan (OJK) secara berkala.

Banks regularly submit reports to the Financial Services Authority (OJK) on Provision of Funds, Provision of Large Funds, Exceptions to Provision of Large Funds, Violations of the LLL, or Exceeding the LLL.

Secara internal, Bank menyusun pelaporan BMPK yang melibatkan unit kerja terkait dengan mekanisme sebagai berikut:

1. Sebagai dasar penentuan BMPK dan Penyediaan Dana Besar (*Large Exposure*), Divisi KTR menyediakan data Modal Bank posisi terakhir kepada Divisi yang membidangi portofolio kredit.
2. Divisi Bisnis Kantor Pusat, Unit Kerja, Divisi/Desk dan unit kerja terkait melaporkan data yang diperlukan.
3. untuk pelaporan sesuai fungsinya masing-masing kepada Divisi yang membidangi portofolio kredit.
4. Divisi yang membidangi portofolio kredit melakukan konsolidasi dan membuat laporan BMPK dan Penyediaan Dana Besar (*Large Exposure*) dan menyampaikan kepada Direksi dan Dewan Komisaris.

Internally, the Bank prepares LLL reporting through the collaboration of many work groups responsible for the following mechanisms:

1. To assist the Division in charge of the loan portfolio in assessing the LLL and Large Exposure, the KTR Division provides data on the most recent Bank Capital position.
2. The Head Office Business Division, Work Unit, Division/Desk, and associated work units are responsible for reporting the relevant data.
3. for reporting to the Division in charge of the credit portfolio in accordance with their respective responsibilities.
4. The loan portfolio management division consolidates and compiles LLL and large exposure reports for submission to the Board of Directors and the Board of Commissioners.

BMPK Internal Internal LLL

Sebagai bentuk penerapan kehati-hatian dan *risk appetite*, Bank menetapkan besaran BMPK internal maksimum sebesar 75% dari BMPK yang ditentukan oleh OJK per obligor.

As a measure of caution and risk tolerance, the Bank establishes a maximum internal LLL of 75% of the LLL assessed by FSA per obligor.

BMPK LLL	Pihak Terkait Related Parties	Pihak tidak terkait Unrelated Parties	Pihak Tidak Terkait (Kelompok Peminjam) Unrelated Parties (Borrower Group)	BUMN SOEs
Pelanggaran atau Pelampauan BMPK Violation or Exceeding the LLL	24	13	2	0

Transaksi Kepada Pihak Terkait Related Party Transactions

Pada tahun 2021, transaksi kepada pihak terkait (*related party transaction*) telah dilakukan secara adil, berlaku umum (*normal commercial terms*), wajar (*arm length basis*) dengan rincian sebagai berikut:

In 2021, transactions between related parties (*related party transactions*) were conducted fairly, in accordance with widely recognised commercial practises (*normal commercial terms*), and on an arm's length basis.

	2021		2020	
	Jumlah Debitur Number of Debtors	Nilai Tercatat Carrying Value	Jumlah Debitur Number of Debtors	Nilai Tercatat Carrying Value
Penyediaan Dana Transaksi Pihak Terkait Provision of Related Party Transaction Funds	24	3.408.476.026	9	3.333.036.193

Program Kepemilikan Saham Oleh Manajemen dan Karyawan Share Ownership Program by Management and Employees

Program MESOP BRI Agro yang telah disetujui dalam Rapat Umum Pemegang Saham Luar Biasa tanggal 26 Juni 2018 dan telah diumumkan dalam Keterbukaan Informasi pada tanggal 23 April 2018, akan diterbitkan dalam 3 (tiga) tahap untuk membeli saham baru sebanyak-banyaknya 350.000.000 (tiga ratus lima puluh juta) saham.

The MESOP BRI Agro program which has been approved at the Extraordinary General Meeting of Shareholders on 26 June 2018 and has been announced in the Disclosure of Information on 23 April 2018, will be issued in 3 (three) stages to purchase new shares of a maximum of 350,000,000 (three) hundred and fifty million shares.

MESOP Tahap I

MESOP Phase I

Jumlah Opsi yang akan dikonversi Number of Options to convert	175.000.000 saham 175,000,000 shares
Asal Saham Origin of Stock	Management Employee Stock Option Program (MESOP) Tahap I Management Employee Stock Option Program (MESOP) Phase I
Harga Pelaksanaan Execution Price	Rp285,- per saham IDR 285,- per share

Periode Pelaksanaan Implementation Period	Tahun 2020/Year 2020 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2020/30 trading days from April 1, 2020 <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2020/30 trading days from August 1, 2020
	Tahun 2021/Year 2021 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2021/30 trading days from April 1, 2021 <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2021/30 trading days from August 1, 2021
	Tahun 2022/Year 2022 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2022/30 trading days from April 1, 2022. <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2022/30 trading days from August 1, 2022.
	Tahun 2023/Year 2023 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2023/30 trading days from April 1, 2023.

MESOP Tahap II	MESOP Phase II
Jumlah Opsi yang akan dikonversi Number of Options to convert	105.000.000 saham 105,000,000 shares
Asal Saham Origin of Stock	Management Employee Stock Option Program (MESOP) Tahap II Management Employee Stock Option Program (MESOP) Phase II
Harga Pelaksanaan Execution Price	Rp295,- per saham IDR 295,- per share
Periode Pelaksanaan Implementation Period	Tahun 2020/Year 2020 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2020/30 trading days starting April 1, 2020 <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2020/30 trading days from 1 August 2020
	Tahun 2021/Year 2021 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2021/30 trading days from April 1, 2021 <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2021/30 trading days from August 1, 2021.
	Tahun 2022/Year 2022 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2022/30 trading days from April 1, 2022. <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2022/30 trading days from August 1, 2022.
	Tahun 2023/Year 2023 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2023/30 trading days from April 1, 2023.

MESOP Tahap III

MESOP Phase III

Jumlah Opsi yang akan dikonversi Number of Options to convert	70.000.000 saham 70,000,000 shares
Asal Saham Origin of Stock	Management Employee Stock Option Program (MESOP) Tahap III Management Employee Stock Option Program (MESOP) Phase III
Harga Pelaksanaan Execution Price	Rp100,- per saham IDR 100,- per share
Periode Pelaksanaan Implementation Period	Tahun 2021/Year 2021 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2021/30 trading days from April 1, 2021 <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2021/30 trading days from August 1, 2021. Tahun 2022/Year 2022 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2022/30 trading days from April 1, 2022. <i>Window Exercise II :</i> 30 hari bursa terhitung sejak tanggal 1 Agustus 2022/30 trading days from August 1, 2022. Tahun 2023/Year 2023 <i>Window Exercise I :</i> 30 hari bursa terhitung sejak tanggal 1 April 2023/30 trading days from April 1, 2023.

Pembagian saham MESOP untuk Pengurus Bank akan dilakukan dalam tiga tahap alokasi yaitu:

The distribution of MESOP shares to Bank Management will be carried out in three stages of allocation, namely:

Periode Period	Tanggal Periode Period Date	% dari jumlah total saham yang dibagi % of the total number of shares divided	Jumlah saham (lembar) Number of shares (sheets)
Tahap I Stage I	10 Desember 2018 December 10, 2018	50%	52.500.000
Tahap II Stage II	1 April 2019 April 1, 2019	30%	31.500.000
Tahap III Stage III	1 April 2020 April 1, 2020	20%	21.000.000
Total		100%	105.000.000

Berdasarkan hal tersebut, maka jumlah saham yang disetor dan ditempatkan Perseroan mengalami perubahan sebagai berikut:

Based on this, the number of shares paid up and issued by the Company has changed as follows:

No	Keterangan Description	Jumlah Saham Number of shares
1.	Sesuai Akta Pernyataan Keputusan Rapat No.18 Tanggal 27 April 2021 yang dibuat oleh Notaris Nova Faisal SH. M.Kn In accordance with the Deed of Statement of Meeting Resolutions No.18 dated April 27, 2021 made by Notary Nova Faisal SH. M.Kn	21.343.290.230 lembar saham 21,343,290,230 shares
2.	Jumlah Saham baru yang diterbitkan dari Program MESOP Periode April 2021 Number of new shares issued from the MESOP Program April 2021	249.376.451 lembar saham 249,376,451 shares
3.	Sesuai Akta Pernyataan Keputusan Rapat No.07 tanggal 12 Juli 2021 yang dibuat oleh Notaris Nova Faisal SH. M.Kn dan telah diberitahukan kepada Kemenkumham sebagaimana tercantum dalam Surat Penerimaan Pemberitahuan Perubahan Anggaran Dasar. No. AHU-0122517.AH.01.11. Tahun 2021 tanggal 13 Juli 2021. In accordance with the Deed of Statement of Meeting Resolutions No. 07 dated July 12, 2021, made by Notary Nova Faisal SH. M.Kn and has been notified to the Ministry of Law and Human Rights as stated in the Letter of Acceptance of Notification of Amendment to the Articles of Association. No. AHU-0122517.AH.01.11. 2021, July 13, 2021.	21.592.666.681 lembar saham 21,592,666,681 shares
4.	Jumlah Saham baru yang diterbitkan dari Program MESOP Periode Agustus 2021 Number of new shares issued from the MESOP Program for the August 2021 Period	99.314.846 lembar saham 99,314,846 shares
5.	Sesuai Akta Pernyataan Keputusan Rapat No.26 tanggal 27 September 2021 yang dibuat oleh Notaris Nova Faisal SH. M.Kn dan telah diberitahukan kepada Kemenkumham sebagaimana tercantum dalam Surat Penerimaan Pemberitahuan Perubahan Anggaran Dasar. No. AHU-0166120.AH.01.11. Tahun 2021 tanggal 27 September 2021. In accordance with the Deed of Statement of Meeting Resolutions No. 26 dated 27 September 2021 made by Notary Nova Faisal SH. M.Kn and has been notified to the Ministry of Law and Human Rights as stated in the Letter of Acceptance of Notification of Amendment to the Articles of Association. No. AHU-0166120.AH.01.11. The year 2021 is September 27, 2021.	21.691.981.527 lembar saham 21,691,981,527 shares

Benturan Kepentingan dan/atau Transaksi dengan Pihak Afiliasi

Conflict of Interest and/or Transactions With Affiliated Parties

Selama tahun 2021, tidak ada benturan kepentingan di Bank Raya. Meskipun demikian, terdapat Transaksi Afiliasi antara Bank Raya dengan BRI tentang layanan transaksi *host-to-host*. Dengan layanan transaksi *host-to-host* ini, nasabah Bank Raya dapat melakukan sejumlah transaksi perbankan melalui jaringan BRI di seluruh Indonesia. Transaksi yang terdapat dalam cakupan layanan ini diantaranya: transaksi setor tunai, transaksi tarik tunai, transaksi *overbooking* ("OB") antara rekening Bank Raya dan rekening BRI, transaksi OB antar rekening Bank Raya, dan fasilitas cetak rekening koran.

Bank raya had no conflict of interest in 2021. Bank Raya and BRI, on the other hand, have an affiliate transaction regarding *host-to-host* transaction services. Bank Raya customers can perform a variety of banking transactions through the BRI network across Indonesia with this *host-to-host* transaction service. This service covers cash deposit and withdrawal transactions, *overbooking* ("OB") transactions between bank raya and BRI accounts, OB transactions between Bank Raya accounts, and bank statement printing facilities.

No.	Penjelasan Exegesis	Keterangan Description
1.	Jenis Informasi atau Fakta Material Types of material information or facts	Penandatanganan Perjanjian Kerjasama antara PT Bank Rakyat Indonesia (Persero) Tbk dengan PT Bank Raya Indonesia Tbk tentang Layanan Transaksi Nasabah Pihak Kedua di Unit Kerja Pihak Pertama. Signature of a cooperation agreement between PT Bank Rakyat Indonesia (Persero) Tbk and PT Bank Raya Indonesia Tbk regarding second party customer transaction services in the first party work unit.
2.	Para Pihak The Parties	1) PT Bank Rakyat Indonesia (Persero) Tbk., suatu perseroan terbatas yang didirikan berdasarkan hukum Republik Indonesia yang berdomisili di Jalan Jenderal Sudirman Kav. 44-46 Jakarta 10210 (untuk selanjutnya disebut dengan "BBRI"); dan 2) PT Bank Raya Indonesia Tbk, suatu perseroan terbatas yang didirikan berdasarkan hukum Republik Indonesia yang berdomisili di Jl. Warung Jati No. 139 Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta untuk selanjutnya disebut dengan ("AGRO"). AGRO merupakan Perusahaan Terkendali dari BBRI dengan 85,72% sahamnya dimiliki oleh BBRI. 1) PT Bank Rakyat Indonesia (Persero) Tbk., a limited liability company established under the laws of the republic of indonesia and located at Jalan Jenderal Sudirman kav. 44-46 Jakarta 10210 (hereinafter called "BBRI"); and 2) PT Bank Raya Indonesia Tbk, a limited liability company established under the laws of the republic of indonesia, with its headquarters in Jl. Warung Jati No. 139 South jakarta city, special capital region of Jakarta, hereinafter referred to as PT Bank Raya Indonesia ("agro"). Agro is BBRI's controlled company, with BBRI owning 85.72% of its shares.
3.	Uraian Transaksi Afiliasi	Pada tanggal 31 Desember 2021, para pihak, menandatangani perjanjian sbb: Melakukan penandatanganan Perjanjian Kerjasama antara PT Bank Rakyat Indonesia (Persero) Tbk dengan PT Bank Raya Indonesia Tbk tentang Layanan Transaksi Nasabah Bank Raya di Unit Kerja BRI. BRI memberikan fasilitas layanan transaksi <i>host to host</i> Bank Raya di Unit Kerja BRI yang dapat dimanfaatkan nasabah Bank Raya pada Unit Kerja BRI. Adapun Transaksi yang dapat dimanfaatkan nasabah Bank Raya yaitu transaksi setor tunai, tarik tunai, transfer antar Bank Raya, transfer Bank Raya ke BRI. Selaras dengan POJK No.12/POJK.03/2021 tentang Bank Umum, dan dan Permen BUMN 03/2017, Kerjasama Layanan Transaksi Nasabah Bank Raya di Unit Kerja BRI ini menjadi salah satu bagian dari sinergi antar kelompok usaha perbankan dalam rangka efisiensi dan optimalisasi sumber daya, melalui dukungan serta memberikan nilai tambah dalam menunjang pelaksanaan aktivitas bisnis, layanan dan operasional. Tujuan dari Kerjasama Layanan Transaksi Nasabah Bank Raya di Unit Kerja BRI ini adalah untuk memenuhi kebutuhan Penyediaan layanan transaksi perbankan kepada Nasabah Bank Raya.

No.	Penjelasan Exegesis	Keterangan Description
	Affiliate Transaction Description	The parties signed the following agreement on December 31, 2021: Signed an agreement with PT Bank Rakyat Indonesia (Persero) Tbk and PT Bank Raya Indonesia Tbk regarding Bank Raya customer transaction services at the BRI work unit. BRI provides hosting for Bank Raya transaction service facilities in BRI work units that Bank Raya customers can use in BRI work units. Cash deposit transactions, cash withdrawals, transfers between bank raya, and transfers from Bank Raya to BRI are all transactions that Bank Raya customers can use. In accordance with POJK No.12/Pojk.03/2021 About commercial banks and soe ministerial regulation 03/2017, this collaboration between Bank Raya customer transaction services and the BRI work unit is part of the synergy between banking business groups in the matter of efficiency and optim resources, by supporting and adding value to the implementation of business activities, services, and operations. The purpose of the Bank Raya customer transaction service cooperation within the BRI work unit is to satisfy the needs of Bank Raya customers for banking transaction services.
4.	Dampak kejadian, Transaksi Afiliasi tersebut terhadap kegiatan operasional, hukum, kondisi keuangan, atau kelangsungan usaha Emiten The incident's or Affiliated Transaction's impact on the issuer's operational activities, law, financial condition, or business continuity	Transaksi Afiliasi tersebut tidak memiliki dampak material terhadap kelangsungan usaha Perseroan, baik pada saat ini maupun setelah pelaksanaan Layanan Transaksi Nasabah Bank Raya di Unit Kerja BRI The Affiliated Transaction has no significant effect on the continuity of the company's business, now or after the implementation of Bank Raya customer transaction services in the BRI work unit.

Aspek Transparansi Kondisi Bank

Transparency Aspects of Bank Conditions

Bank Raya telah memenuhi kewajiban transparansi dan publikasi kondisi keuangan dan non-keuangan sesuai ketentuan berlaku, melalui penyampaian dan publikasi informasi baik melalui media cetak maupun situs web Bank sebagaimana berikut ini:

1. Laporan Keuangan Bulanan kepada regulator, yang juga dipublikasikan melalui situs web OJK dan Bank.
2. Laporan Keuangan triwulan kepada regulator, yang juga dipublikasikan melalui media cetak dan situs web Bank.
3. Laporan tahunan Bank Raya yang disusun dan disajikan sesuai ketentuan dan disampaikan kepada regulator, rating agency, lembaga pengembangan perbankan, lembaga/institusi riset dan majalah keuangan dan dipublikasikan melalui situs web Bank.
4. Informasi tata Kelola perusahaan, yang di antaranya adalah Laporan tahunan tata Kelola perusahaan, visi, Misi, nilai perusahaan, Komposisi dan profil Dewan Komisaris dan Direksi, serta ketentuan internal terkait tata kelola mulai dari Anggaran Dasar hingga piagam Komite-komite yang juga dipublikasikan melalui situs web Bank.
5. Informasi produk dan Layanan perusahaan, termasuk jaringan kantor, dipublikasikan melalui Laporan tahunan dan situs web Bank, agar nasabah, investor dan masyarakat luas dapat dengan mudah mengakses informasi atas produk dan layanan Bank.
6. Informasi prosedur penyampaian pengaduan, Kebijakan Keamanan Informasi dan tips bagi nasabah dalam menggunakan layanan perbankan yang dipublikasikan melalui situs web Bank untuk pelaksanaan ketentuan perlindungan konsumen.
7. Informasi lainnya yang bertujuan untuk mendukung keterbukaan informasi, edukasi keuangan dan layanan kepada masyarakat.

Bank Raya has fulfilled its obligations for transparency and publication of financial and non-financial conditions in accordance with applicable regulations, through the submission and publication of information both through print media and the Bank's website as follows:

1. Monthly Financial Reports to regulators, which are also published through the OJK and Bank websites.
2. Quarterly Financial Reports to regulators, which are also published through print media and the Bank's website.
3. Bank Raya's annual report is prepared and presented in accordance with regulations and submitted to regulators, rating agencies, banking development institutions, research institutions/institutions and financial magazines and published through the Bank's website.
4. Corporate governance information, which includes the annual report on corporate governance, vision, mission, corporate values, composition and profiles of the Board of Commissioners and the Board of Directors, as well as internal regulations related to governance ranging from the Articles of Association to the committees charter which is also published on the website. bank website.
5. Information on the company's products and services, including office network, is published through the annual report and the Bank's website, so that customers, investors and the general public can easily access information on the Bank's products and services.
6. Information on complaint submission procedures, Information Security Policy and tips for customers in using banking services published through the Bank's website for the implementation of consumer protection provisions.
7. Other information that aims to support information disclosure, financial education and services to the public.

Perkara Hukum

Lawsuit

Sepanjang tahun 2021, Bank sedang menghadapi 28 (dua puluh delapan) perkara yang terdiri dari 17 (tujuh belas) perkara perdata, 4 (empat) perkara niaga (PKPU dan Kepailitan) dan 7 (tujuh) perkara pidana. Selain perkara-perkara tersebut, Bank tidak terlibat dalam perkara lainnya baik dalam lingkup perdata, pidana, kepailitan, hubungan industrial, tata usaha negara, perpajakan, perkara arbitrase maupun sengketa atau klaim lainnya dengan pihak manapun, dan juga tidak terdapat somasi terhadap Bank yang berpotensi menjadi perkara. Perkara-perkara dimaksud secara material tidak mempengaruhi kelangsungan usaha dan operasional Perseroan serta keadaan keuangan Perseroan dan bukanlah perkara yang melibatkan anggota Direksi dan Dewan Komisaris Bank.

Throughout 2021, the Bank is facing 28 (twenty eight) cases consisting of 17 (seventeen) civil cases, 4 (four) commercial cases (PKPU and Bankruptcy) and 7 (seven) criminal cases. In addition to these cases, the Bank is not involved in other cases in the scope of civil, criminal, bankruptcy, industrial relations, state administration, taxation, arbitration cases or other disputes or claims with any party, and there is also no subpoena against the Bank which has the potential to be a thing. These cases do not materially affect the business continuity and operations of the Company as well as the financial condition of the Company and are not cases involving members of the Board of Directors and Board of Commissioners of the Bank.

Sanksi Administratif

Administrative Sanctions

Sanksi administratif yang diterima Bank sepanjang tahun 2021, berupa total pengenaan denda sebesar Rp84.932.827,- (delapan puluh empat juta sembilan ratus tiga puluh dua ribu delapan ratus dua puluh tujuh rupiah).

Administrative sanctions received by the Bank throughout 2021, in the form of a total fine of IDR 84,932,827, - (eighty four million nine hundred thirty two thousand eight hundred and twenty seven rupiah).

Kode Etik

Code of Conducts

Kode etik dan perilaku menjadi pedoman semua pihak di perusahaan dalam menjalankan kegiatan usaha maupun operasi secara beretika dan berintegritas. Kode etik dan perilaku bersifat dinamis, dan senantiasa diperbaharui agar selaras dengan perkembangan regulasi, norma serta bisnis perusahaan.

The code of ethics and behavior guides all parties in the company in carrying out business activities and operations with ethics and integrity. The code of ethics and behavior is dynamic, and is constantly being updated to be in line with developments in regulations, norms and the company's business.

Sejak tahun 2011, Kode etik perseroan PT Bank Raya Indonesia Tbk mulai diberlakukan sebagai pedoman, tata cara etis, dan pola aturan yang berlaku di dalam setiap kegiatan operasional perseroan. Kode etik bagi seluruh pekerja dan pejabat manajemen berlaku wajib dipahami, ditaati dan dilaksanakan. Perseroan juga memutakhirkan kebijakan mengenai Kode etik perseroan di dalam Lampiran Surat KEputusan Direksi PT. BankRaya Indonesia, Tbk. No.Kpts. B.616/DIR.01.02/OJL/11/2021 tanggal 15 November 2021 tentang Kebijakan Kode Etik Bank.

Since 2011, the company code of ethics of PT Bank Raya Indonesia Tbk has been enacted as a guideline, ethical procedure, and pattern of rules that apply in every operational activity of the company. The code of conduct for all employees and management officials must be understood, adhered to and implemented. The Company has also updated the policy regarding the company's code of ethics in the Attachment of Decree No.Kpts. B.616/DIR.01.02/OJL/11/2021 of the Board of Directors of PT. BankRaya Indonesia, Tbk. dated 15 November 2021 respecting the Bank's Code of Conducts Policy.

Visi, Misi Dan Budaya Kerja Bank Sebagai Landasan Kode Etik

Vision, Mission and Work Culture of the Bank as the Foundation of the Code of Conducts

Penyusunan Kode etik Bank Raya dilandasi pada visi, Misi dan Budaya Kerja Bank yang merupakan arah dan tujuan pengembangan Bank secara berkelanjutan. Sebagai bagian upaya membangun lingkungan kerja yang kondusif dan etika kerja yang produktif, Bank terus melakukan beberapa inisiatif untuk membentuk budaya kerja yang positif. Budaya kerja yang dimiliki Bank berisi nilai-nilai, norma-norma dan kebiasaan yang mempengaruhi pemikiran, tingkah laku, dan cara kerja karyawan dan manajemen, yang bermuara pada peningkatan kualitas kinerja Bank.

The preparation of the Bank Raya Code of Ethics is based on the vision, mission and work culture of the Bank which is the direction and purpose of the Bank's sustainable development. As part of efforts to build a conducive work environment and productive work ethic, the Bank continues to undertake several initiatives to establish a positive work culture. The Bank's work culture contains values, norms and habits that influence the thinking, behavior, and workings of employees and management, which leads to improving the quality of the Bank's performance.

Visi dan Misi
Budaya Kerja Bank

Kode Etik Sebagai Panduan

Pokok-pokok Isi Kode etik

Contents of the Code of Ethics

Setiap insan Bank bertanggung jawab untuk mewujudkan Kode etik Bank ini ke dalam setiap perilaku mereka, tanggung jawab untuk memonitor hubungan pribadi dan profesional terletak pada masing-masing Insan Bank sehingga tidak akan merugikan masing-masing Insan Bank karena tingkah laku setiap Insan Bank mencerminkan etika bisnis Bank, oleh karena itu Insan Bank diharuskan untuk:

1. Patuh dan taat pada ketentuan perundang-undangan dan peraturan yang berlaku;
2. Melakukan pencatatan yang benar mengenai segala transaksi yang berkaitan dengan kegiatan Bank
3. Menghindarkan diri dari persaingan yang tidak sehat
4. Memberikan pelayanan dan memuaskan nasabah.
5. Menghindarkan diri dari keterlibatan dalam pengambilan keputusan dalam hal terdapat benturan kepentingan
6. Menjaga kerahasiaan nasabah dan Bank.
7. Memperhitungkan dampak yang merugikan dari setiap kebijakan yang ditetapkan bank terhadap keadaan ekonomi, sosial dan lingkungan.
8. Tidak menerima hadiah atau imbalan yang memperkaya diri pribadi maupun keluarganya.
9. Memberikan keteladanan dan penghargaan kepada Sumber Daya Manusia.

Sementara itu, kode etik pekerja Bank juga tercantum dalam Perjanjian Kerja Bersama (PKB) yang disahkan pada 12 Maret 2012.

Each Bank personnel is responsible for embodying this Bank's Code of ethics into their behavior, the responsibility for monitoring personal and professional relationships lies with each Bank Person so that it will not harm the individual concerned or the Bank due to the behavior of each Bank Person. reflects the Bank's business ethics, therefore Bank personnel are required to:

1. Obey and comply with the provisions of the applicable laws and regulations;
2. Carry out correct recording of all transactions related to Bank activities
3. Avoid unfair competition
4. Provide service and satisfy customers.
5. Avoid being involved in decision making in the event of a conflict of interest
6. Maintain customer and bank confidentiality.
7. Consider the harmful effect of each bank's policy on economic, social, and environmental situations.
8. Do not accept gifts or rewards that enrich themselves or their families.
9. Provide exemplary and appreciation to Human Resources.

Meanwhile, the Bank's code of conduct for employees is also stated in the Collective Labor Agreement (PKB) which was ratified on March 12, 2012.

Pengungkapan Kepatuhan Bahwa Kode Etik Berlaku Bagi Seluruh Level Organisasi

Compliance Disclosure That the Code of Ethics Applies to All Levels of the Organization

Seluruh anggota Dewan Komisaris, anggota Direksi, anggota Komite, pekerja tetap, pekerja kontrak serta tenaga *outsourcing* sesuai dengan ketentuan yang berlaku wajib mematuhi dan melaksanakan Kode etik Bank yang ditandai dengan pembubuhan tanda tangan oleh segenap Insan Bank Raya pada surat pernyataan Kepatuhan terhadap Kode etik Insan Bank Raya sebagai wujud nyata komitmen dalam melaksanakan Kode etik Bank Raya.

All members of the Board of Commissioners, members of the Board of Directors, Committee members, permanent workers, contract workers and outsourcing personnel in accordance with applicable regulations must comply with and implement the Bank's Code of Ethics which is marked by the affixing of signatures by all Bank Raya Personnel on the statement letter of Compliance with the Code of Ethics for Persons Bank Raya as a tangible manifestation of commitment in implementing the Bank Raya Code of conducts.

Sosialisasi Dan Penyebarluasan Kode Etik Dissemination and Dissemination of the Code of Ethics

Di tahun 2022, kegiatan sosialisasi kode etik dilakukan dengan penandatanganan Pernyataan Kepatuhan terhadap Kode Etik oleh Direksi, Dewan Komisaris dan Seluruh Pekerja Bank Raya yang dilakukan di bulan Januari 2022 dan juga sosialisasi terhadap ketentuan Kode Etik melalui *Training/Pendidikan* kepada Pekerja, baik di Kantor Pusat maupun di Kantor Cabang/Kantor Cabang Pembantu/Kantor Kas.

In 2022, the socialization of the code of ethics was carried out by signing the Statement of Compliance with the Code of Ethics by the Board of Directors, Board of Commissioners and All Employees of Bank Raya which was carried out in January 2022 and also dissemination of the provisions of the Code of Ethics through Training/Education to Employees, both at the Head Office as well as at Branch Offices/Sub-Branch Offices/Cash Offices.

Jenis Sanksi Untuk Masing-Masing Jenis Pelanggaran yang Diatur Dalam Kode Etik Types of Sanctions for Each Type of Violation Regulated in the Code of Ethics

Bank Raya bersikap tegas kepada pekerja yang melakukan pelanggaran dengan pengawasan penerapan kode etik perseroan yang merupakan kerjasama dari beberapa divisi dalam perseroan, antara lain Divisi *Human Capital*, Satuan Kerja audit Intern dan Divisi *Legal & Compliance*.

Bank Raya Bank takes a firm stance on employees who violate the company's code of conducts by supervising the implementation of the company's code of ethics which is a collaboration of several divisions within the company, including the Human Capital Division, Internal Audit Unit and the Legal & Compliance Division.

Divisi *Legal & Compliance* bertanggung jawab untuk memonitor kepatuhan terhadap Kode etik Bank sedangkan Divisi *Human Capital* dan memberikan laporan kepada Komite audit dan membuat catatan pelanggaran, baik yang potensial ataupun yang benar-benar terjadi.

The Legal & Compliance Division is responsible for monitoring compliance with the Bank's code of ethics while the Human Capital Division provides reports to the audit committee and keeps records of violations, both potential and actual.

Divisi *Human Capital* membuat daftar pelanggaran dan bertanggung jawab memberitahukan kepada pihak yang diberikan wewenang atas setiap pelanggaran yang terjadi dalam kurun waktu tertentu dan Direksi telah mengeluarkan surat keputusan berkaitan dengan pelanggaran dan proses pemberian hukuman sebagai berikut:

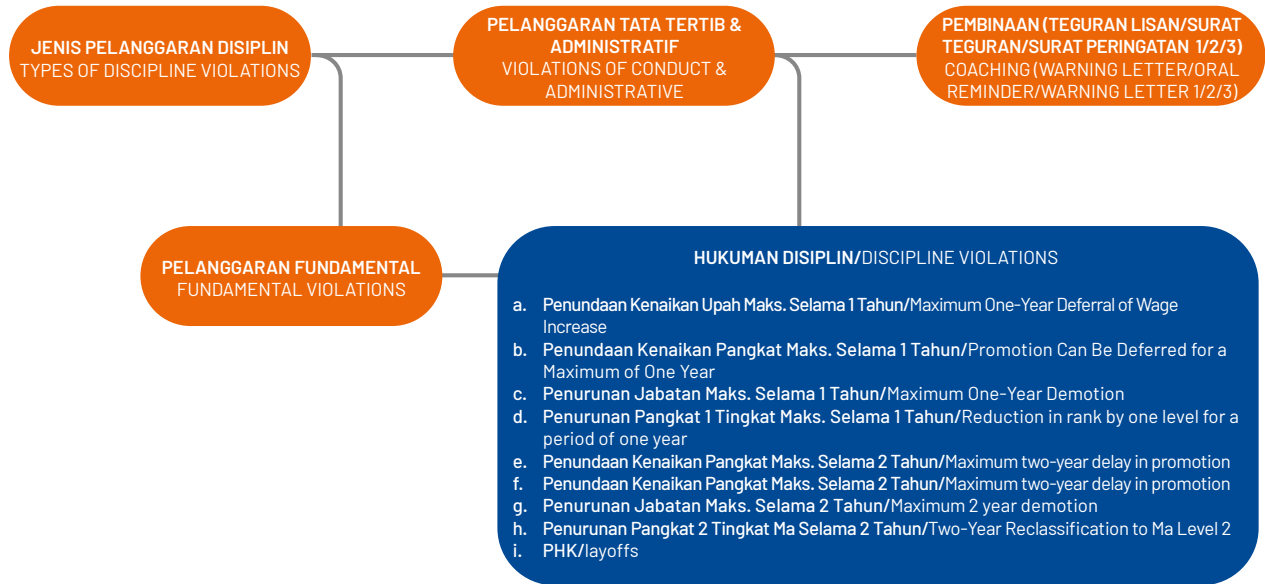
The Human Capital Division makes a list of violations and is responsible for notifying the party authorized for any violations that occur within a certain period of time and the Board of Directors has issued a decision letter regarding the violation and the process of giving punishment as follows:

- SK Direksi No. Kpts. 14/DIR.02.04/MSDM/VII/2012 tanggal 31 Juli 2012 tentang peraturan Disiplin;
- SK Direksi No. Kpts. R.25/DIR.01.02/MSDM/XI/2015 tanggal 18 November 2015 tentang ralat Ketentuan proses pemberian Hukuman Disiplin;
- SK Direksi No. Kpts. 57/DIR.01.02/MSDM/XII/2015 tanggal 31 Desember 2015 tentang pengaturan Kembali Mengenai tindakan atas pelanggaran Disiplin Kategori ringan Beserta Implikasinya dan Matriks tata tertib Hukuman Disiplin

- Decree of the Board of Directors No. Kpts. 14/DIR.02.04/MSDM/VII/2012 dated July 31, 2012 concerning Discipline Regulations;
- Decree of the Board of Directors No. Kpts. R.25/DIR.01.02/MSDM/XI/2015 dated November 18, 2015 regarding the revision of the provisions for the process of administering disciplinary penalties;
- Decree of the Board of Directors No. Kpts. 57/DIR.01.02/MSDM/XII/2015 dated December 31, 2015 regarding the re-arrangement of actions for minor Discipline violations along with their implications and the matrix of disciplinary penalties

Berikut adalah matrik tata tertib pemberian hukuman dan tabel jenis sanksi dan implikasi yang diterapkan di Bank Raya:

The following is a matrix of rules for administering penalties and a table of types of sanctions and implications applied at Bank Raya Bank:



Jenis Sanksi pelanggaran Kode etik Insan Bank Raya dalam tingkatan apapun apabila jelas terbukti telah melakukan pelanggaran terhadap Kode etik Bank Raya maka akan dikenakan sanksi sesuai dengan peraturan yang tercantum dalam kebijakan dan ketentuan yang berlaku.

Types of Sanctions for violating the Code of Ethics for Bank Raya Personnel at any level, if it is clear that they have violated the Code of Ethics for Bank Raya, they will be subject to sanctions in accordance with the regulations stated in the applicable policies and provisions.

Kategori Pelanggaran Disiplin Disciplinary Violation Category	Sanksi Sanctions	Jangka Waktu Period	Implikasi Implications
Ringan	- Pembinaan - Teguran Lisan - Surat teguran - Surat peringatan 1, 2, dan 3	6 (enam) bulan	
Lightweight	- Construction - Verbal Reprimands - Letter of reprimand - Reminder letters 1, 2, and 3	6 (six) months	
Sedang Pertama	Hukuman Disiplin: - Penundaan Kenaikan Upah - Penundaan Kenaikan pangkat - Penurunan Jabatan - Penurunan pangkat satu tingkat	Maksimal selama satu tahun	- Jika mengalami penurunan pangkat, maka upah pokok yang bersangkutan ditetapkan menjadi sebesar upah pokok minimum pada pangkat baru setelah diberikan hukuman disiplin. - Penilaian Kinerja pekerja yang bersangkutan pada tahun pemberian hukuman disiplin dikenakan penalti berupa pengurangan terhadap <i>performance assessment</i> yang bersangkutan sebesar 1,00 dari hasil akhir <i>performance assessment</i> - Penundaan promosi dan tidak dapat diikuti dalam <i>job opening</i> maksimal selama satu tahun. - Tidak berhak atas insentif atau bonus atau bentuk penghargaan lainnya yang berlaku di perusahaan pada tahun diberikannya hukuman disiplin kepada pekerja yang bersangkutan

Kategori Pelanggaran Disiplin Disciplinary Violation Category	Sanksi Sanctions	Jangka Waktu Period	Implikasi Implications
First Medium	Disciplinary Punishment: - Postponement of Wage Increase - Postponement of Promotion - Decline of Department - One -level demotion	Maximum for one year	1. If there is a demotion, then the basic wage in question is set to be the minimum basic wage for the new rank after being given a disciplinary punishment. 2. Performance Assessment of the employee concerned in the year the disciplinary punishment is given is subject to a penalty in the form of a reduction in the performance assessment concerned by 1.00 from the final result of the performance assessment. 3. Promotion delays and cannot be included in the job opening for a maximum of one year. 4. Not entitled to incentives or bonuses or other forms of awards that apply in the company in the year the disciplinary punishment is given to the worker concerned
Sedang Kedua	Hukuman Disiplin: - Penundaan Kenaikan Upah - Penundaan Kenaikan pangkat - Penurunan Jabatan - Penurunan pangkat satu tingkat	Maksimal selama dua tahun	1. Jika mengalami penurunan pangkat, maka upah pokok yang bersangkutan ditetapkan menjadi sebesar upah pokok minimum pada pangkat baru setelah diberikan hukuman disiplin 2. Penilaian Kinerja pekerja bersangkutan pada tahun pemberian Hk. Disiplin dikenakan penalti berupa pengurangan terhadap <i>performance assessment</i> yang bersangkutan sebesar 1,25 dari hasil akhir <i>performance assessment</i> 3. Penundaan promosi dan tidak dapat diikuti dalam <i>job</i> 4. Tidak berhak atas insentif atau bonus atau bentuk penghargaan lainnya yang berlaku di perusahaan pada tahun diberikannya hukuman disiplin kepada pekerja yang bersangkutan.
Second Medium	Disciplinary Punishment: - Wage Increase Delay - Promotion Delay - Demotion - One level demotion	Maximum for two years	1. If you experience a decrease in rank, then the basic wage in question is set to be equal to the minimum basic wage at the new rank after being given a disciplinary punishment 2. Performance appraisal of the worker concerned in the year of granting of Hk. Discipline is subject to a penalty in the form of a reduction in the relevant performance assessment of 1.25 from the final performance assessment 3. Promotion delay and cannot be included in the job 4. Not entitled to incentives or bonuses or other forms of awards that apply in the company in the year the disciplinary punishment is given to the worker concerned.

Kategori Pelanggaran Disiplin Disciplinary Violation Category	Sanksi Sanctions	Jangka Waktu Period	Implikasi Implications
Berat	Hukuman Disiplin: pemutusan Hubungan Kerja (phk)	-	Tidak berhak atas insentif atau bonus atau bentuk penghargaan lainnya yang berlaku di perusahaan pada tahun diberikannya hukuman disiplin kepada pekerja yang bersangkutan
Heavy	Disciplinary Punishment: termination of employment (layoff)	-	Not entitled to incentives or bonuses or other forms of awards that apply in the company in the year the disciplinary punishment is given to the worker concerned

Jumlah Pelanggaran Kode Etik Beserta Sanksi yang Diberikan Pada Tahun Buku

Number of Violations of the Code of Conducts and Sanctions Given in the Financial Year

Pemberian sanksi yang dilakukan BRI Agro sepanjang tahun 2021 adalah sebagai berikut:

The sanctions imposed by BRI Agro throughout 2021 are as follows:

No.	Sanksi Sanctions	Jumlah Pekerja Number of Employees
1.	PHK Layoffs	1
2.	Penurunan Pangkat 2 tingkat 2 levels of demotion	0
3.	Penurunan Pangkat 1 tingkat Demotion 1 level	3
4.	Penundaan kenaikan pangkat 2 tahun Delay of promotion of 2 years	0
5.	Penundaan kenaikan pangkat 1 tahun Postponement of promotion of 1 year	3
6.	Surat Peringatan III Reminder Letter III	1
7.	Surat Peringatan II Reminder Letter II	2
8.	Surat Peringatan I Reminder Letter I	1
Total		11

Sistem Pelaporan Pelanggaran (*Whistleblowing System*)

Violation Reporting System (*Whistleblowing System*)

Agar penerapan prinsip dan praktik GCG dapat berjalan dengan baik, diperlukan sebuah sarana pelaporan dan/atau pengaduan yang memberikan ruang bagi mekanisme pelaporan yang mengedepankan kerahasiaan. Mekanisme ini, yang disebut juga dengan *Whistleblowing System* (WBS), menjadi bagian penting dalam entitas usaha untuk membuka kemungkinan adanya pelaporan atas kecurangan yang terkelola secara mandiri.

Bank Raya telah membuat kebijakan mengenai sistem pelaporan pelanggaran dan telah dituangkan ke dalam Surat Direksi No. Kpts. No. 01/DIR.02.04/SKAI/vi/2012 tanggal 4 Juni 2012 tentang pedoman Sistem pelaporan pelanggaran *Whistleblowing System* sebagaimana telah diperbaharui dalam Surat Keputusan Direksi No. Kpts.: B.25/DIR.01.02/ SKAI/10/2016 tanggal 30 oktober 2016 tentang revisi Sistem pelaporan pelanggaran (*Whistleblowing System*).

Tujuan penerapan sistem ini adalah menciptakan iklim yang kondusif dan mendorong pelaporan terhadap hal-hal yang dapat menimbulkan kerugian finansial maupun non finansial, termasuk hal-hal yang dapat merusak citra organisasi.

In order for the implementation of GCG principles and practices to run properly, a reporting and/or complaint facility is needed that provides space for a reporting mechanism that prioritizes confidentiality. This mechanism, which is also known as the *Whistleblowing System* (WBS), is an important part of business entities to open up the possibility of reporting fraud that is managed independently.

Bank Raya has made a policy regarding the violation reporting system and it has been stated in the Board of Directors' Letter No. Kpts. No. 01/DIR.02.04/SKAI/vi/2012 dated June 4, 2012 regarding the guidelines for the *Whistleblowing System* violation reporting system as amended in the Decree of the Board of Directors No. Kpts.: B.25/DIR.01.02/ SKAI/10/2016 dated October 30, 2016 regarding the revision of the *Whistleblowing System*.

The purpose of implementing this system is to create a conducive climate and encourage reporting of things that can cause financial and non-financial losses, including things that can damage the image of the organization.

Sosialisasi Sistem Pelaporan Pelanggaran Violation Reporting System Dissemination

Pelaksanaan sosialisasi WBS dilakukan secara berkesinambungan antara lain pelaksanaan pelatihan kepada pekerja baru, sosialisasi poster pengumuman internal, email *blast* dan sms *blast* kepada segenap pekerja serta melalui peran Serikat pekerja untuk membantu mensosialisasikan kepada segenap pekerja di Cabang.

WBS distribution is ongoing, and includes training for new employees, socialisation of internal announcement posters, email blasts, and text blasts to all employees, as well as the involvement of labour unions in assisting with information dissemination to all employees in Branches.

Prosedur Penyampaian Pelaporan Report Submission Procedure

Perusahaan akan memproses dan menindaklanjuti setiap laporan yang diterima sepanjang disertai dengan bukti yang kuat dan bukan bertujuan untuk menjatuhkan atau memfitnah insan perusahaan yang dilaporkan. Laporan yang tidak memenuhi kriteria dimaksud tidak akan diproses lebih lanjut.

The company will process and follow up on every report received as long as it is accompanied by strong evidence and is not intended to bring down or slander the reported company personnel. Reports that do not meet these criteria will not be processed further.

Sarana Pelaporan Reporting Tools

Perusahaan menyediakan saluran khusus yang digunakan untuk menyampaikan laporan pelanggaran sebagai berikut:

1. Secara tertulis dalam amplop tertutup dengan mencantumkan tulisan pada amplop "*confidential/rahasia*" yang ditujukan kepada Direktur Utama;

The company provides special channels used to submit reports of violations as follows:

1. In writing in a closed envelope by including the words on the "*confidential*" envelope addressed to the President Director;

2. Melalui pesan singkat/SMS (*Short Message Service*) atau *Whatsapps* Nomor: 0813 186 30003;
3. Melalui email ke : lapor.wbs@bankraya.co.id pelapor yang menyampaikan laporan pelanggaran dengan sarana yang telah ditetapkan seperti tersebut di atas dapat memperoleh informasi *progress* penanganan tindak lanjut atas informasi pelanggaran yang disampaikan dalam WBS.

2. Via short message/SMS (*Short Message Service*) or *Whatsapps* Number: 0813 186 30003;
3. Via email to: lapor.wbs@bankraya.co.id the whistleblower who submits a violation report using the facilities specified above can obtain information on the progress of handling follow-up actions on the violation information submitted in the WBS.

Kriteria Pelaporan

Reporting Criteria

Pelapor wajib menyampaikan indikasi pelanggaran secara jelas yang dapat dipertanggungjawabkan, di mana minimal meliputi:

1. Kategori pelanggaran yang diadukan;
2. Pihak yang terlibat;
3. Waktu terjadinya pelanggaran;
4. Tempat terjadinya pelanggaran
5. Bagaimana kejadiannya;
6. Bukti bukti pelanggaran (bila ada);
7. Identitas pelapor (nama, alamat, No hp, unit kerja).

Pelapor dapat memberikan informasi tambahan apabila diminta untuk kelengkapan informasi awal indikasi pelanggaran.

The Whistleblower is required to convey clear indications of violations that can be accounted for, which at a minimum include:

1. The category of violation that is being reported;
2. Parties involved;
3. The time the violation occurred;
4. The place where the violation occurred
5. How it happened;
6. Evidence of violation evidence (if any);
7. Reporting identity (name, address, cellphone number, work unit).

Reporting identity (name, address, cellphone number, work unit). The whistleblower can provide additional information if requested for completeness of the initial information indicating a violation.

Perlindungan Bagi Whistleblower

Whistleblower Protection

Bank melindungi kerahasiaan identitas pelapor dengan tidak menyampaikan identitas pelapor ke pihak manapun, baik internal maupun eksternal. Perlindungan hanya dapat diberikan kepada pelapor dengan kategori *partial anonymity* dan *Full Disclosure*. Bank Raya juga akan merahasiakan informasi yang dilaporkan dan hanya akan menggunakan informasi tersebut sebagai sumber informasi awal dalam proses investigasi tanpa mengungkapkan identitas pelapor.

Bank Raya juga memberi pelapor perlindungan atas tindakan balasan dari terlapor atau lembaga.

The Bank protects the confidentiality of the reporter's identity by not revealing the identity of the reporter to any party, both internal and external. Protection can only be given to the whistleblower in the categories of *partial anonymity* and *Full Disclosure*. Bank Raya will also keep the information reported confidential and will only use the information as a source of initial information in the investigation process without revealing the identity of the reporter.

Bank Raya also provides the whistleblower with protection against retaliation from the reported party or institution.

Penanganan Pengaduan

The handling of complaints

Alur kerja/mekanisme penanganan laporan adalah sebagai berikut:

1. Pelapor menyampaikan laporan pengaduan pelanggaran melalui sarana *whistleblowing system* yang telah ditetapkan oleh Bank;

The workflow/report handling mechanism is as follows:

1. The whistleblower submits a violation complaint report through the whistleblowing system that has been established by the Bank;

2. Setiap laporan pelanggaran yang masuk akan didokumentasikan oleh PIC *whistleblowing system*; dan dilaporkan kepada pengelola WBS (Kepala Satuan Kerja audit Intern) dengan segera.
 3. Laporan pengaduan diseleksi dan diverifikasi untuk membuktikan bahwa laporan yang disampaikan tersebut dapat ditindaklanjuti, dan disertai bukti awal yang memadai.
 4. Pengelola WBS melaporkan kepada Manajemen dan/atau penanggung Jawab WBS atas indikasi pelanggaran yang telah diputuskan untuk ditindaklanjuti ke tingkat penyelidikan/ investigasi, dan pihak-pihak yang dilibatkan dalam penanganan tindak-lanjutnya termasuk pelanggaran yang mengarah ke tindakan pelanggaran disiplin.
 5. Pihak-pihak yang dapat dilibatkan dalam penanganan tindak lanjut (sebagai tim pemeriksa) yaitu:
 - Satuan Kerja Audit Intern
 - Divisi *Human Capital*
 - Divisi *Change Management*
 - Divisi lainnya yang terkait.
 6. Dalam hal pelapor menyampaikan laporan tanpa melalui sarana pelaporan yang telah ditetapkan (surat dan atau sms dan atau email) baik melalui lisan atau saluran telepon kepada Manajemen maka laporan pengaduannya baru dapat diproses untuk diseleksi, diverifikasi dan ditindaklanjuti setelah pelapor menyampaikan kembali melalui sarana pelaporan yang telah ditetapkan (surat dan atau sms dan atau email).
 7. Dalam hal oleh karena tingkat signifikansinya, Laporan tindakan pelanggaran yang disampaikan terbukti tidak memerlukan tim pemeriksa secara khusus maka penanganan tindak lanjut atas pelanggaran tersebut didelegasikan kepada pejabat terkait yang memiliki kewenangan untuk melakukan perbaikan.
 8. Terlapor yang terbukti melakukan pelanggaran akan diberikan sanksi sesuai dengan ketentuan yang berlaku.
 9. PIC *Whistleblowing system* menyiapkan laporan secara berkala atas semua pelaporan pelanggaran termasuk *progress* tindak lanjutnya kepada pengelola WBS.
 10. Kepada pelapor diberikan hak untuk memantau perkembangan tindak lanjut tindakan pelanggaran yang dilaporkannya melalui saluran telepon dan email yang disediakan.
 11. Pelapor yang menyampaikan laporan pelanggaran dengan sarana yang telah ditetapkan seperti tersebut di atas dapat memperoleh informasi *progress* penanganan tindak lanjut atas informasi pelanggaran yang disampaikan dalam WBS paling lambat 30 (tiga puluh) hari kerja setelah laporan diterima dan informasi hasil penyelidikan maksimal 3 (tiga) bulan setelah ditetapkan dilakukan penyelidikan/ investigasi oleh pihak yang ditunjuk penanggung jawab WBS.
2. Every incoming violation report will be documented by the PIC *whistleblowing system*; and reported to the WBS manager (Head of Internal Audit Unit) immediately.
 3. Complaint reports are selected and verified to prove that the submitted reports can be followed up, and accompanied by adequate initial evidence.
 4. The WBS Manager reports to the Management and/or the person in charge of WBS on indications of violations that have been decided to be followed up at the investigation/ investigation level, and the parties involved in handling the follow-up including violations that lead to disciplinary violations.
 5. The parties that can be involved in handling the follow-up (as the inspection team) are:
 - Internal Audit Unit
 - Human Capital Division
 - Change Management Division
 - Other related divisions.
 6. In the event that the reporter submits a report without going through the designated reporting means (letters and or sms and or email) either verbally or by telephone to the Management, the complaint report can only be processed for selection, verification and follow-up after the reporter submits it back through the reporting facilities that have been approved. specified (letter and or sms and or email).
 7. In the event that due to its level of significance , the reported violation action is proven not to require a special inspection team, the handling of follow-up actions for the violation is delegated to the relevant official who has the authority to make improvements.
 8. The Reported Party who is proven to have committed a violation will be given sanctions in accordance with the applicable provisions.
 9. PIC *Whistleblowing system* prepares periodic reports on all reporting violations including the progress of the follow-up to the WBS manager.
 10. The whistleblower is given the right to monitor the progress of the follow-up to the reported violation through the provided telephone and e-mail lines.
 11. Whistleblower who submits a violation report using the facilities that have been determined as mentioned above can obtain information on the progress of handling the follow-up to the violation information submitted in the WBS no later than 30 (thirty) working days after the report is received and information on the results of the investigation a maximum of 3 (three) months. after being determined, an investigation/ investigation is carried out by the party appointed in charge of the WBS.

Pihak yang Mengelola Pengaduan Complaint Management

Penanggung Jawab WBS di Bank Raya adalah Direktur Utama. Dalam pelaksanaan tugasnya sebagai penanggung jawab WBS, Direktur Utama menunjuk Kepala Satuan Kerja audit Intern sebagai pengelola WBS. pengelola WBS adalah penanggung jawab pelaksanaan WBS di Bank Raya yang bertanggung jawab kepada Direktur Utama. Dalam menjalankan tugasnya, pengelola WBS dibantu oleh PIC WBS yang mempunyai kompetensi dan integritas yang memadai untuk menjalankan aktivitas harian WBS. penunjukan/pengangkatan PIC WBS dilakukan oleh pengelola WBS.

The person in charge of WBS at Bank Raya is the President Director. In carrying out his duties as the person in charge of the WBS, the President Director appoints the Head of the Internal Audit Unit as the WBS manager. WBS manager is the person in charge of WBS implementation at Bank Raya who is responsible to the President Director. In carrying out their duties, WBS managers are assisted by WBS PICs who have sufficient competence and integrity to carry out daily WBS activities. the appointment/appointment of the WBS PIC is carried out by the WBS manager.

Jumlah Pengaduan yang Masuk Dan Diproses Pada Tahun Buku Terakhir serta Tindak lanjutnya.

Number of Complaints Entered and Processed in the Last Financial Year and Follow-Ups.

No.	Periode Periods	Jumlah Total	Status Status
1.	TW1 2021	1	Selesai
2.	TW2 2021	Nihil	-
3.	TW3 2021	Nihil	-

Pengendalian Gratifikasi Gratification Control

Bank Raya memiliki Kebijakan pedoman pengendalian Gratifikasi yang sebagaimana dimuat dalam Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk.No.Kpts.B.363/DIR.01.02/OJL/08/2021 tanggal 9 Agustus 2021 tentang Kebijakan Anti Penyuapan dan Pengendalian Gratifikasi PT Bank Raya Indonesia Tbk. Kebijakan pengendalian Gratifikasi ini bertujuan untuk:

1. Memberikan pedoman bagi Insan Bank Raya untuk memahami, mencegah dan mengendalikan praktik gratifikasi di perusahaan
2. Membentuk lingkungan organisasi yang sadar dan terkendali dalam pengendalian praktik gratifikasi sehingga prinsip keterbukaan dan akuntabilitas dalam menjalankan kegiatan operasional dan bisnis sehari-hari semakin terimplementasi.
3. Memberikan arahan dan acuan bagi Insan Bank Raya mengenai pentingnya kepatuhan melaporkan gratifikasi untuk perlindungan dirinya sendiri maupun keluarganya dari peluang dikenakannya tuduhan tindak pidana suap.
4. Menciptakan mekanisme pelaporan gratifikasi secara internal untuk mendukung lingkungan perusahaan yang bersih dari praktik gratifikasi.

Bank Raya has a Gratification control guideline policy as contained in the Joint Decree of the Board of Directors of PT Bank Raya Indonesia, Tbk.No.Kpts.B.363/DIR.01.02/OJL/08/2021 August 9, 2021 on Anti-Bribery and Gratification Control Policy of PT Bank Raya Indonesia Tbk. This Gratification control policy aims to:

1. Provide guidelines for Bank Raya personnel to understand, prevent and control gratification practices in the company
2. Establish a conscious and controlled organizational environment in controlling gratification practices so that the principles of transparency and accountability in carrying out daily operational and business activities are increasingly implemented.
3. Provide direction and reference for Bank Raya personnel regarding the importance of compliance in reporting gratuities to protect themselves and their families from the opportunity to be charged with bribery.
4. Create a gratification reporting mechanism internally to support a company environment that is free from gratification practices.

Kebijakan Anti Korupsi Anti-Corruption Policy

Saat ini Bank Raya belum memiliki kebijakan khusus terkait anti korupsi, namun sebagai cikal bakal dari kebijakan tersebut, Bank Raya telah memiliki Kebijakan pedoman pengendalian Gratifikasi yang tercantum dalam Surat Keputusan Direksi PT. Bank Raya Indonesia, Tbk.No. Kpts.B.363/DIR.01.02/OJL/08/2021 tanggal 9 Agustus 2021 tentang Kebijakan Anti Penyuapan dan Pengendalian Gratifikasi.

Currently, Bank Raya does not have a specific policy related to anti-corruption, but as the forerunner of this policy, Bank Raya already has a Gratification control guideline policy which is stated in the Joint Decree of the Board of Directors of PT. Bank Raya Indonesia, Tbk.No.Kpts.B.363/DIR.01.02/OJL/08/2021 dated August 9, 2021 concerning Anti-Bribery Policy and Gratification Control.

Kebijakan Perlindungan Nasabah Customer Protection Policy

Untuk memudahkan layanan bagi nasabah, baik dalam menginformasikan produk Bank Raya dan untuk menanggapi pertanyaan serta keluhan terhadap layanannya, Bank menyediakan pusat pelayanan konsumen yang dapat diakses melalui *Call Center* yaitu *Call Bank Raya* 1500494 atau melalui *customer service* di seluruh Kantor Layanan Bank Raya. Pengelolaan pengaduan pelanggan dilaksanakan oleh Bagian Jaringan dan Layanan (JLN) yang berada di bawah koordinasi Divisi *Change Management*. Petugas *Customer Service* di seluruh Unit Kerja operasional dapat menangani secara langsung pengaduan yang telah diterima. Apabila pengaduan dilakukan melalui *Call Bank Raya*, maka petugas akan meneruskannya ke unit kerja terkait sesuai dengan jenis keluhan atau pengaduan dari nasabah untuk proses penyelesaian, selanjutnya unit kerja yang terkait dengan keluhan nasabah akan memberikan jawaban atau konfirmasi kepada petugas *Call Bank Raya*.

Keluhan dan pengaduan konsumen yang disampaikan melalui surat kabar/media massa akan dikelola oleh Bagian Komunikasi perusahaan dari Divisi Sekretariat perusahaan dan Bagian Hukum dari Divisi Kepatuhan, Manajemen risiko dan Hukum.

To facilitate service for customers, both in informing Bank Raya products and in responding to questions and complaints about its services, the Bank provides a customer service center that can be accessed through Call Centers, namely Call Bank Raya 1500494 or through customer service in all Bank Raya Service Offices. The management of customer complaints is carried out by the Network and Services Section (JLN) which is under the coordination of the Change Management Division. Customer Service Officers in all operational Work Units can directly handle complaints that have been received. If the complaint is made through Call Bank Raya, the officer will forward it to the relevant work unit according to the type of complaint or complaint from the customer for the settlement process, then the work unit related to the customer complaint will provide an answer or confirmation to the Call Bank Raya officer.

Consumer complaints and complaints submitted through newspapers/ mass media will be managed by the Corporate Communications Division of the Corporate Secretariat Division and the Legal Division of the Compliance, Risk Management and Legal Division.

Kebijakan Konflik Manajemen (Termasuk *Insider Trading*) Conflict Management Policy (Including Insider Trading)

Pengelolaan aktivitas hubungan investor telah mencakup di kebijakan perseroan berupa Surat Keputusan Direksi No. B.04/DIR.01.02/SKP/12/2014 tanggal 16 Desember 2014, tentang kebijakan pelayanan dan pengelolaan informasi PT Bank Raya Indonesia Tbk .

Kebijakan tersebut mengatur untuk pengelolaan informasi melalui satu pintu. Perseroan diwakili oleh Direksi dan Sekretaris perusahaan untuk menyampaikan informasi yang berkaitan dengan keadaan perseroan kepada pihak eksternal.

The management of investor relations activities has been included in the company's policy in the form of the Decree of the Board of Directors no. B.04 /DIR.01.02/SKP /12/2014 dated December 16, 2014, regarding the information service and management policy of PT Bank Raya Indonesia Tbk.

The policy provides for the management of information through one door. The Company is represented by the Board of Directors and Corporate Secretary to convey information related to the condition of the Company to external parties.

Kebijakan Kredit Ramah Lingkungan

Environment Friendly Credit Policy

Bank Raya belum melakukan penyusunan Kebijakan Kredit ramah Lingkungan, meskipun demikian Bank Raya berkomitmen untuk melakukan penyaluran kredit secara selektif dan terhadap debitur yang bergerak di Kelapa Sawit Bank Raya mensyaratkan memiliki sertifikasi Indonesian Sustainable Palm Oil (ISPO).

Bank Raya has not yet developed an environmentally friendly credit policy, although Bank Raya is committed to selectively channeling credit and to debtors operating in oil palm, Bank Raya requires Indonesian Sustainable Palm Oil (ISPO) certification.

Perlindungan Hak Kreditur

Creditor's Rights Protection

Guna melindungi hak-hak kreditur, Bank menerapkan sistem keterbukaan informasi secara jujur dan transparan, serta memperlakukan persamaan (*equal treatment*) kepada seluruh kreditur tanpa adanya diskriminasi. Dengan keterbukaan informasi, seluruh kreditur maupun mitra usaha berhak memperoleh informasi yang relevan sesuai kebutuhannya sehingga masing-masing pihak dapat membuat keputusan yang objektif atas dasar pertimbangan yang adil, wajar dan akurat. Agar hak-hak kreditur dapat dilaksanakan dengan baik, maka hak-hak tersebut diatur dalam perjanjian yang disepakati oleh kedua belah pihak dan Bank wajib menjalankan kewajibannya sebagaimana yang dijanjikan dengan tepat waktu dan berupaya untuk menghindari keterlambatan maupun kelalaian yang berpotensi menimbulkan kerugian kedua belah pihak.

In order to protect the rights of creditors, the Bank implements an honest and transparent information disclosure system, and treats equality (*equal treatment*) to all creditors without any discrimination. With information disclosure, all creditors and business partners have the right to obtain relevant information according to their needs so that each party can make objective decisions based on fair, reasonable and accurate considerations. In order for the rights of creditors to be implemented properly, these rights are regulated in an agreement agreed upon by both parties and the Bank is required to carry out its obligations as promised in a timely manner and strive to avoid delays or negligence that could potentially cause losses for both parties.

Pelanggaran (*Fraud*) Internal

Internal Fraud

Penanganan pelanggaran (*Fraud*) mengacu pada Surat edaran Bank Indonesia Nomor 13/28/DPNP tanggal 9 Desember 2011 tentang penerapan Strategi anti *Fraud*.

The handling of violations (*Fraud*) refers to the Circular Letter of Bank Indonesia Number 13/28/D PNP dated December 9, 2011 concerning the implementation of the Anti-Fraud Strategy.

Kebijakan anti *Fraud* Bank Raya sebagaimana Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk.No.Kpts.B.19/DIR.01.03/RMG/08/2020 tanggal 26 Agustus 2020 tentang Strategi Anti *Fraud* yang juga telah dijelaskan dalam bab Manajemen risiko pada Laporan tahunan ini yang merupakan bagian dari sistem pengendalian Intern Bank dalam membangun budaya kepatuhan dan menciptakan kesadaran risiko atas potensi dan konsekuensi terjadinya *fraud* pada seluruh jenjang organisasi.

Bank Raya's anti-Fraud policy as stated in Decree of the Board of Directors of PT Bank Raya Indonesia, Tbk.No.Kpts.B.19/DIR.01.03/RMG/08/2020 dated 26 August 2020 regarding Anti Fraud Strategy which has also been described in the Risk management chapter of this annual report which is part of the Internal control system. The Bank in building a culture of compliance and creating risk awareness of the potential and consequences of fraud at all levels of the organization.

Kebijakan ini mengatur mengenai kerangka kerja, tata kelola dan penerapan strategi anti-*fraud* yang merupakan strategi Bank dalam mengendalikan *fraud* dengan memperhatikan karakteristik dan jangkauan dari potensi *fraud* serta diimplementasikan dalam bentuk sistem pengendalian *fraud*.

This policy regulates the framework, governance and implementation of anti-fraud strategy which is the Bank's strategy in controlling fraud by taking into account the characteristics and scope of potential fraud and is implemented in the form of a fraud control system.

Fraud yang terjadi selama tahun 2021 adalah sebanyak 1(satu) kali dengan kerugian Rp1.471.338.291.

Fraud that occurred during 2021 was 1 (one) time with a loss of IDR 1,471,338,291.

Akses Informasi dan Data Perusahaan

Access To Company Information And Data

Bank Raya memandang keterbukaan informasi dan penyampaian informasi yang komprehensif merupakan bagian dari hak pemangku kepentingan.

Bank senantiasa memberikan kemudahan bagi para pemangku kepentingan untuk mengakses informasi dan data Bank melalui situs web www.bankraya.co.id; Telp. : +62 21 7919 9980/ +62 21 8066 7600; *call center* : 1500 494 atau melalui email: humas@bankraya.co.id

Bank Raya views that information disclosure and comprehensive information delivery are part of the rights of stakeholders.

The Bank always makes it easy for stakeholders to access Bank information and data through the website www.bankraya.co.id; Telephone Telp.: +62 21 7919 9980 / +62 21 8066 7600; call center : 1500 494 or via email : humas@bankraya.co.id

Komunikasi Internal

Internal Communication

Sebagai pemangku kepentingan internal yang berhubungan langsung dengan kinerja Bank, karyawan memiliki hak untuk mendapatkan informasi yang komprehensif terkait kinerja dan kemajuan Bank. Berikut disampaikan beberapa saluran yang digunakan Bank untuk menyampaikan informasi kepada karyawan dan pihak internal lainnya.

- Portal Single Sign-On (Portal SSO)**
Dalam melaksanakan kegiatan yang berhubungan dengan komunikasi Internal, Bank telah menyebarluaskan informasi yang berkaitan dengan kegiatan-kegiatan yang dilakukan termasuk juga mengenai program, kebijakan manajemen, aktivitas cabang dan divisi melalui Portal SSO yang secara digital dapat diakses oleh seluruh karyawan Bank.
- Agenda Kegiatan Bank** memiliki berbagai kegiatan yang bersifat berkala maupun tertentu, diselenggarakan dan dipromotori oleh *Corporate Communication* yang mengelola alur kegiatan setiap event dari awal hingga akhir. Di mana event yang diselenggarakan dihadiri oleh internal karyawan Bank maupun pihak eksternal seperti Pemegang Saham dan nasabah. Event-event yang dilaksanakan oleh Internal Komunikasi yang berlangsung selama tahun 2021 diantaranya:

As internal stakeholders who are directly related to the performance of the Bank, employees have the right to obtain comprehensive information regarding the performance and progress of the Bank. Following are some of the channels used by the Bank to convey information to employees and other internal parties.

- Single Sign-On Portal (SSO Portal)**
In carrying out activities related to internal communication, the Bank has disseminated information related to the activities carried out including programs, management policies, branch and division activities through the SSO Portal which can be digitally accessed by all Bank employees.
- Agenda of Activities** The Bank has various activities that are periodic or specific, organized and promoted by Corporate Communications which manages the flow of activities for each event from beginning to end. Where the event held was attended by internal Bank employees and external parties such as Shareholders and customers. The events carried out by Internal Communications that will take place during 2021 include:

No	Kegiatan Activity	Tanggal Date
1.	Doa Bersama Awal Tahun 2021 Prayers for the Beginning of 2021	6 Januari 2021 January 6, 2021
2.	Donor Darah Blood donors	10 Januari 2021 January 10, 2021
3.	Rapat Kerja Nasional National Working Meeting	25 – 26 Januari 2021 January 25 – 26, 2021
4.	Rapat Umum Pemegang Saham Tahunan Annual General Meeting of Shareholders	9 April 2021 April 9, 2021
5.	Webinar Series: Digital Immersion Opportunity on Indonesia Gig Economy Webinar Series: Digital Immersion Opportunity on Indonesia Gig Economy	22 April 2021 April 22, 2021
6.	Webinar Series: Culture Clinic How Do We Take Part in Transformation Movement Webinar Series: Culture Clinic How Do We Take Part in Transformation Movement	29 April 2021 April 29, 2021

No	Kegiatan Activity	Tanggal Date
7.	Iftar Online: BRI Agro Berbagi, Bersedekah, Bersyukur di kala Pandemi Iftar Online: BRI Agro Sharing, Giving Alms, Gratitude during the Pandemic	5 Mei 2021 May 5, 2021
8.	Rapat Kerja Transformasi Transformation Work Meeting	19 Mei 2021 May 19, 2021
9.	Webinar Series: Master Class Marketing and Strategy Management Webinar Series: Master Class Marketing and Strategy Management	6 Mei 2021 May 6, 2021
10.	Pisah Sambut Direksi & Dekom Farewell to the Board of Directors and the Board of Commissioners	4 Juni 2021 June 4, 2021
11.	Webinar Series: Master Class Digital Use In Agriculture Webinar Series: Master Class Digital Use In Agriculture	2 Juni 2021 June 2, 2021
12.	Webinar Series: Culture Clinic New Way Working On Digital Webinar Series: Culture Clinic New Way Working On Digital	10 Juni 2021 June 10, 2021
13.	Webinar Series: Master Class Performance Driven Culture and How to Set Up the Right Habit Within Our Organization Webinar Series: Master Class Performance Driven Culture and How to Set Up the Right Habit Within Our Organization	17 Juni 2021 June 17, 2021
14.	Webinar Series: Master Class Key Success Factors Aligning Digital Bank with SPI 2025 Webinar Series: Master Class Key Success Factors Aligning Digital Bank with SPI 2025	8 Juli 2021 July 8, 2021
15.	Webinar Series: Culture Clinic Healthy life in Pandemic Era Webinar Series: Culture Clinic Healthy life in Pandemic Era	23 Juli 2021 July 23, 2021
16.	CEO Message CEO Message	13 Agustus 2021 August 13, 2021
17.	Perjanjian Kerjasama BRI Agro & Raywhite BRI Agro & Raywhite Cooperation Agreement	25 Agustus 2021 August 25, 2021
18.	BOD Gathering BOD Gathering	10-12 September 2021 September 10-12, 2021
19.	RUPS Luar Biasa Extraordinary GMS	27 September 2021 September 27, 2021
20.	Webinar Series: Culture Clinic Industry 4.0 Culture Awareness for Digital Finance Webinar Series: Culture Clinic Industry 4.0 Culture Awareness for Digital Finance	19 Oktober 2021 October 19, 2021
21.	Raker PRK Selindo Selindo PRK Work Meeting	10-11 November 2021 November 10-11, 2021
22.	Launching Community Branch Cirebon Launching Community Branch Cirebon	15 November 2021 November 15, 2021

Komunikasi Eksternal External Communication

Komunikasi eksternal berfungsi untuk memastikan komunikasi Bank dengan pihak eksternal berjalan dengan baik sehingga meningkatkan reputasi dan citra korporat Bank. Berikut adalah Komunikasi eksternal yang dilakukan Bank Raya tahun 2021 antara lain:

1. Media Internet

Media internet yang digunakan adalah *situs web* dengan alamat www.bankraya.co.id yang dapat diakses pengguna jaringan internet. *Situs* ini menyajikan beragam informasi Bank seperti produk dan layanan, laporan keuangan, jaringan, dan berita

External communication functions to ensure that the Bank's communication with external parties runs well, thereby enhancing the Bank's reputation and corporate image. The following are external communications carried out by Bank Raya in 2021, among others:

1. Internet Media

The internet media used is a website with the address www.bankraya.co.id which can be accessed by internet network users. This site provides various Bank information such as products and services, financial reports, networks, and news

2. Media Sosial

Bank juga memperhatikan perkembangan media sosial sebagai fasilitas komunikasi interaksi dengan seluruh pemangku kepentingan. Untuk itu, Bank membuka kanal komunikasi daring melalui Facebook, Instagram, twitter dan Youtube.

3. Media Monitoring & analisis

Untuk memberikan informasi terkait dengan berbagai macam pemberitaan di media massa baik itu pemberitaan mengenai Bank ataupun lingkup hal yang berkaitan dengan Bank. Media *monitoring* berperan bagi Internal Bank dalam mengetahui seputar informasi atau kegiatan yang sedang hangat seperti halnya Kenaikan pemberitaan signing MoU, kegiatan korporasi, perubahan nama, dan lainnya. Media *monitoring* juga berperan dalam perhitungan PR *value* dan advertorial *value* dimana setiap kegiatan tersebut akan diliput oleh media cetak maupun elektronik yang pemberitaan Bank telah diekspos.

4. Media relation

Dalam rangka membangun kerjasama yang baik dengan pihak media, Bank Raya memiliki unit bernama Media *relations* untuk menjaga hubungan baik antara Bank dengan wartawan media.

5. Publikasi dan Iklan publikasi dilakukan oleh Komunikasi eksternal dalam penyebaran informasi baik berupa iklan produk atau keterbukaan informasi yang harus dipublikasikan menggunakan media cetak dan elektronik. Sasaran penyebaran informasi yaitu kepada masyarakat umum dengan komunikasi yang disampaikan berupa publikasi cetak dan elektronik sebagai alat promosi kepada masyarakat. penyampaian informasi dengan media tersebut dapat berupa iklan maupun siaran pers.

Berikut eksposur media Bank Raya di tahun 2021, baik yang berupa iklan maupun siaran pers:

2. Social media

The Bank also pays attention to the development of social media as a communication facility for interaction with all stakeholders. To that end, the Bank opens online communication channels via Facebook, Instagram, Twitter and Youtube.

3. Media Monitoring & analysis

To provide information related to various kinds of news in the mass media, whether it is news about the Bank or the scope of matters relating to the Bank. Media monitoring plays a role for the Internal Bank in knowing about information or activities that are currently hot, such as the increase in news on MoU signing, corporate activities, name changes, and others. Media monitoring also plays a role in the calculation of PR value and advertorial value where each activity will be covered by print and electronic media in which the Bank's news has been exposed.

4. Media relations

In order to build good cooperation with the media, Bank Raya has a unit called Media relations to maintain good relations between the Bank and media journalists.

5. Publication and Publication advertisements are carried out by External Communications in disseminating information in the form of product advertisements or information disclosure which must be published using print and electronic media. The target of disseminating information is to the general public by communicating in the form of print and electronic publications as a promotional tool to the public. the delivery of information with these media can be in the form of advertisements or press releases.

The following is Bank Raya's media exposure in 2021, both in the form of advertisements and press releases:

Siaran Pers

Press conference

No.	Tanggal Date	Judul Siaran Pers Press Release Title	Tayang Show
1.	6 Januari 2021	BRI Agro Berkolaborasi dengan TaniHub Group Untuk Layanan Perbankan Dalam Program Indonesia Tani	Kontan.id, bisnis.com, Investor.id, industry.co.id, infobanknews.com, CNBC Indonesia, Warta Ekonomi, Lantari Bursa.com, Beritasatu, dailysocial.com, banten.com, Sindonews.com
	January 6, 2021	BRI Agro Collaborates with TaniHub Group for Banking Services in the Indonesia Tani Program	Kontan.id, Bisnis.com, Investor.id, industry.co.id, infobanknews.com, CNBC Indonesia, Warta Ekonomi, Lantari Bursa.com, Berita Satu, dailysocial.com, banten.com, Sindonews.com
2.	18 Februari 2021	Tunjukkan Kepedulian Bagi Sesama, BRILLIAN AGRO Sumbangkan Darah	Infobanknews.com, CNBC Indonesia, Tribunnews, Sindonews.com, Investor.id.
	February 18, 2021	Show Concern for Others, BRILLIAN AGRO Donates Blood	Infobanknews.com, CNBC Indonesia, Tribunnews, Sindonews.com, Investor.id.

No.	Tanggal Date	Judul Siaran Pers Press Release Title	Tayang Show
3.	5 Maret 2021	Dorong Ekosistem Agen Pulsa, BRI Agro Salurkan Kredit Ultra Mikro Melalui <i>Fintech</i> Modal Rakyat	Kontan.id, bisnis.com, cobisnis.com, CNBC Indonesia, infobanknews.com, investor.id.
	March 5, 2021	Pushing Credit Agent Ecosystem, BRI Agro Distributes Ultra Micro Credit Through People's Capital Fintech	Kontan.id, Bisnis.com, cobisnis.com, CNBC Indonesia, infobanknews.com, investor.id.
4.	25 Maret 2021	Sinergi BRI Agro dan BRI Life, Sempurnakan Layanan untuk Nasabah	Investor.id, CNBC Indonesia, infobanknews.com, idxchannel.com, cobisnis.com, kontan.co.id, Investor Daily, Kontan.
	March 25, 2021	Synergy of BRI Agro and BRI Life, Improve Services for Customers	Investor.id, CNBC Indonesia, infobanknews.com, idxchannel.com, cobisnis.com, kontan.co.id, Investor Daily, Kontan.
5.	8 April 2021 April 8, 2021	BRI Agro Tumbuh Positif Hadapi Pandemi BRI Agro Grows Positively Facing the Pandemic	Berita Satu, Investor.id. Berita Satu, Investor.id.
6.	9 April 2021	BRI Agro Gelar RUPS Tahunan 2021	Infobanknews.com, CNBC Indonesia, mediaindonesia.com, Sindonews.com, idx channel, Okezone, investor.id, Emitennews.com, beritasatu.com, Investor Daily
	April 9, 2021	BRI Agro Holds Annual GMS 2021	Infobanknews.com, CNBC Indonesia, mediaindonesia.com, Sindonews.com, idx channel, Okezone, investor.id, Emitennews.com, beritasatu.com, Investor Daily
7.	30 April 2021	Strategi BRI Agro Tumbuhkan Pinang	Kontan.id, Indonesiaupdate.id, Infobanknews.com, cobisnis.com, CNBC Indonesia, Investor.id, Bisnis.com, Sindonews.com, Mediaindonesia.com,
	April 30, 2021	BRI Agro's Strategy to Grow Areca Nuts	Kontan.id, Indonesiaupdate.id, Infobanknews.com, cobisnis.com, CNBC Indonesia, Investor.id, Bisnis.com, Sindonews.com, Mediaindonesia.com,
8.	6 Mei 2021	Penyaluran Kredit Melalui Platform, BRI Agro Gandeng Modalku	Infobanknews.com, Investor.id, Kontan.co.id, Bisnis.com, CNBC Indonesia, Cobisnis.com, Investor Daily, Kontan.
	May 6, 2021	Credit Distribution Through Platform, BRI Agro Collaborates with Modalku	Infobanknews.com, Investor.id, Kontan.co.id, Bisnis.com, CNBC Indonesia, Cobisnis.com, Investor Daily, Kontan.
9.	7 Mei 2021	Peduli kepada Pekerja Lepas "Gig Economy", BRI Agro Memberikan Bantuan CSR Paket Sembako di Bulan Ramadhan	Cobisnis.com, Infobanknews.com, Investor.id, antaranews.com, mediaindonesia.com, tribunnews.com, Koran Sindo.
	May 7, 2021	Caring for "Gig Economy" Freelancers, BRI Agro Provides CSR Assistance with Basic Food Packages in the Month of Ramadan	Cobusiness.com, Infobanknews.com, Investor.id, Antaranews.com, mediaindonesia.com, tribunnews.com, Koran Sindo.
10.	19 Mei 2021	Siap Jadi Bank Digital, BRI Agro <i>Launching Talent Management System & Employee Value Proposition</i>	Mediaindonesia.com, Kontan.co.id, Cobisnis.com, Antaranews.com, Republika.co.id, Investor.id, Infobanknews.com, CNBC Indonesia, Bisnis.com, Investor Daily.
	May 19, 2021	Ready to Become a Digital Bank, BRI Agro Launches Talent Management System & Employee Value Proposition	Mediaindonesia.com, Kontan.co.id, Cobisnis.com, Antaranews.com, Republika.co.id, Investor.id, Infobanknews.com, CNBC Indonesia, Bisnis.com, Investor Daily.

No.	Tanggal Date	Judul Siaran Pers Press Release Title	Tayang Show
11.	21 Mei 2021	Sinergi Integrasi Layanan Keuangan Perbankan Digital, BRI Agro Gandeng majoo	CNBC Indonesia, Cobisnis.com, Kontan.co.id, Infobanknews.com, Antaranews.com, wartaekonomi.co.id, tribunnews.com, Bisnis.com, Investor.id, Investor Daily, Kontan, Koran Sindo.
	May 21, 2021	Synergy of Digital Banking Financial Services Integration, BRI Agro Collaborates with Majoo	CNBC Indonesia, Cobisnis.com, Kontan.co.id, Infobanknews.com, Antaranews.com, warta Ekonomi, co.id, tribunnews.com, Bisnis.com, Investor.id, Investor Daily, Kontan, Koran Sindo.
12.	25 Mei 2021	BRI Agro Kolaborasi Dengan eFishery Fasilitasi Layanan Perbankan Untuk Budidaya Perikanan	Warta Ekonomi, Mediaindonesia.com, Investor.id, Cianjurekspres, Pasundanekpress, radartasik.com, radarcirebon.com, jabarexpress.com, suara.com, detikfinance.com, Tribunnews, beritasatu.com, cobisnis.com, idxchannel, Bisnis.com, Kontan.id, CNBC Indonesia, Infobanknews.com, Antaranews.com.
	May 25, 2021	BRI Agro Collaborates with eFishery to Facilitate Banking Services for Aquaculture	Warta Ekonomi, Mediaindonesia.com, Investor.id, Cianjurekspres, Pasundanekpress, radartasik.com, radarcirebon.com, jabarexpress.com, Suara.com, detikfinance.com, Tribunnews, beritasatu.com, cobisnis.com, idxchannel, Bisnis.com, Kontan.id, CNBC Indonesia, Infobanknews.com, Antaranews.com.
13.	9 Juni 2021	BRI Agro Raih Penghargaan Digital Brand Awards 2021	Investor.id, Suarapemerintah.com, Mediaindonesia.com, Media Indonesia.
	June 9, 2021	BRI Agro Wins Digital Brand Awards 2021	Investor.id, Suaragovernmental.com, Mediaindonesia.com, Media Indonesia.
14.	15 Juni 2021	BRI Agro, Telkom, iGrow dan Kedai Sayur Berkolaborasi untuk Membangun Ekosistem Digital Pertanian	Tribunnews.com, Warta Ekonomi, Infobanknews.com, Investor.id, Infobisnis.com, Kontan.id, CNN Indonesia, Mediaindonesia.com,
	June 15, 2021	BRI Agro, Telkom, iGrow and Kedai Sayur Collaborate to Build Agricultural Digital Ecosystem	Tribunnews.com, Warta Ekonomi, Infobanknews.com, Investor.id, Infobisnis.com, Kontan.id, CNN Indonesia, Mediaindonesia.com,
15.	18 Juni 2021	Penyaluran Kredit Melalui Digital Platform, BRI Agro Gandeng Koinworks	Warta Ekonomi, Cobisnis.com, Kontan.id, Tribunnews, Tempo.id, Bisnis.com, Antaranews.com, Investor.id, Mediaindonesia.com, Investor Daily.
	June 18, 2021	Credit Distribution Through Digital Platform, BRI Agro Collaborates with Koinworks	Warta Ekonomi, Cobisnis.com, Kontan.id, Tribunnews, Tempo.id, Bisnis.com, Antaranews.com, Investor.id, Mediaindonesia.com, Investor Daily.
16.	24 Juni 2021	Community Branch Konsep Baru BRI Agro untuk mendukung Layanan Perbankan Digital	Cobisnis.com, Antaranews.com, Infobanknews.com, CNBC Indonesia, Mediaindonesia.com, Tribunnews, Kontan.id,
	June 24, 2021	Community Branch to support Digital Banking Services	Cobusiness.com, Antaranews.com, Infobanknews.com, CNBC Indonesia, Mediaindonesia.com, Tribunnews, Kontan.id,
17.	27 September 2021	BRI Agro Rayakan Hari Ulang Tahun ke-32 Dan Pengundian Program Pesta Pinang	CNBC Indonesia
	September 27, 2021	BRI Agro Celebrates 32nd Anniversary and Draws for the Areca Party Program	CNBC Indonesia

No.	Tanggal Date	Judul Siaran Pers Press Release Title	Tayang Show
18.	27 September 2021	RUPS Luar Biasa Menyetujui Ganti Nama BRI Agro menjadi Raya	Investor Daily, Bisnis Indonesia, bisnis.com, Wartaekonomi.com, Kontan.id, Republika.co.id, Antaranews.com, Sindonews.com, Kompas.com, idntimes.com, Fintechasia.com, idxchannel.com
	September 27, 2021	Extraordinary GMS Approves BRI Agro's Name Change to Raya	Investor Daily, Bisnis Indonesia, Bisnis.com, Warta Ekonomi.com, Kontan.id, Republika.co.id, Antaranews.com, Sindonews.com, Kompas.com, idntimes.com, Fintechasia.com, idxchannel.com
19.	6 Oktober 2021	BRI Agro kerjasama dengan Link Aja Grup Melalui Anak Usahanya iGrow	Neraca, Investor Daily, Cnbcindonesia.com, Kontan.co.id, Bisnis.com, Inews.id, Mediaindonesia.com, Investor.id, Trenasia.com
	October 6, 2021	BRI Agro collaborates with Link Aja Group through its subsidiary iGrow	Balance, Investor Daily, Cnbcindonesia.com, Kontan.co.id, Bisnis.com, Inews.id, Mediaindonesia.com, Investor.id, Trenasia.com
20.	8 Oktober 2021	Launching Fasilitas Dana Talangan untuk Agen BRILink, BRI Agro gandeng BRI	Antaranews.com, Wartaekonomi.co.id, Cnbcindonesia.com
	October 8, 2021	Launching of bailout facility for BRILink agents, BRI Agro cooperates with BRI	Antaranews.com, Warta Ekonomi.co.id, Cnbcindonesia.com
	4 November 2021	BRI Agro Migrates to Google Cloud to Advance Digital Banking Strategy	Kontan.co.id, Bisnis.com, Emitennews.com, Industry.co.id
	November 4, 2021	BRI Agro Migrates to Google Cloud to Advance Digital Banking Strategy	Kontan.co.id, Bisnis.com, Emitennews.com, Industry.co.id
21.	15 November 2021	Community Branch Bank Raya Resmi Dibuka di Cirebon	Aboutcirebon.id, Theeconomics.com, Validnews.id, KabarCirebon.com, BekasiMedia.com, Kureta.id, Kureta.id, JogjaAja.com, Opsi.id, Opsi.id
	November 15, 2021	Community Branch Officially Opened in Cirebon	Aboutcirebon.id, Theeconomics.com, Validnews.id, KabarCirebon.com, BekasiMedia.com, Kureta.id, Kureta.id, JogjaAja.com, Option.id, Option.id
22.	18 November 2021	SiCepat Ekspres dan Bank Raya Jalin Kerja Sama Pembiayaan Gig Economy	Kompas.com, Liputan6.com, Industry.co.id, Indonews.id, Bulir.id, Tribunnews.com, Kontan.co.id, Mediaindonesia.com, Investor.id, Sindonews.com, Headtopics.com, Mediastock06.com
	November 18, 2021	SiCepat Ekspres and Bank Raya Establish Gig Economy Financing Cooperation	Kompas.com, Liputan6.com, Industry.co.id, Indonews.id, Blir.id, Tribunnews.com, Kontan.co.id, Mediaindonesia.com, Investor.id, Sindonews.com, Headtopics.com, Mediastock06.com
23.	10 Desember 2021	Bank Raya Sukses Kumpulkan Dana Rp1,16T melalui Rights Issue	Tidak tayang
	December 10, 2021	Bank Raya Success Raises IDR 1.16T through Rights Issue	Not showing

Iklan

Advertisement

No.	Iklan Advertisement	Tanggal Date	Media Media
1.	Iklan Pengumuman RUPST AGMS Announcement Advertisement	4 Maret 2021 March 4, 2021	Investor Daily
2.	Iklan Pemanggilan RUPST AGMS Invitation Advertisement	19 Maret 2021 March 19, 2021	Investor Daily
3.	Iklan Hasil RUPST AGMS Results Advertisement	29 April 2021 April 29, 2021	Investor Daily
4.	Advertorial Talent Management System & EVP Advertorial Talent Management System & EVP	24 Mei 2021 May 24, 2021	Bisnis Indonesia & Investor Daily Indonesian Business & Investor Daily
5.	Iklan Pengumuman RUPSLB EGMS Announcement Advertisement	27 Agustus 2021 August 27, 2021	Investor Daily
6.	Iklan Pemanggilan RUPSLB EGMS Invitation Advertisement	7 September 2021 September 7, 2021	Investor Daily
7.	Iklan Hasil RUPSLB EGMS Results Advertisement	1 Oktober 2021 October 1, 2021	Investor Daily
8.	Iklan Pembukaan <i>Community Branch</i> Cirebon Cirebon Community Branch Opening Advertisement	25 November 2021 November 25, 2021	Fajar Cirebon
9.	Iklan Perubahan Nama Perseroan Company Name Change Advertisement	26 November 2021 November 26, 2021	Bisnis Indonesia & Investor Daily Indonesian Business & Investor Daily
10.	Iklan Perubahan Logo Perseroan Company Logo Change Advertisement	30 November 2021 November 30, 2021	Kompas & Kontan Compass & Cash
11.	Iklan <i>Placement Media Digital Gig Economy</i> Gig Economy Digital Media Placement Ads	24 Desember 2021 December 24, 2021	Youtube
12.	Advertorial dan Infografis Partnership Advertorials and Infographics Partnership	29 Desember 2021 December 29, 2021	CNBC

6. Media Luar ruang

Selain melalui media internet, cetak, elektronik, Bank juga menggunakan media luar ruang sebagai sarana penyampaian informasi dan bentuk promosi berupa iklan Billboard yang terpasang di jalan.

7. Korespondensi

Sepanjang tahun 2021 Bank telah melaksanakan korespondensi terkait keterbukaan informasi kepada berbagai pihak. penyampaian transparansi laporan adalah sebagai berikut,

6. Outdoor Media

Apart from internet, print, and electronic media, the Bank also uses outdoor media as a means of delivering information and a form of promotion in the form of billboard advertisements posted on the street.

7. Correspondence

Throughout 2021 the Bank has carried out correspondence regarding information disclosure to various parties. submission of report transparency is as follows,

Keterangan
Description

JANUARI
JANUARY

7	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Des 2020 Monthly Report of Bank Raya Securities Holder Registration Period Dec 31, 2020
11	Laporan Hutang Valas Bank Raya Periode 31 Des 2020 Bank Raya Foreign Currency Debt Report Period Dec 31, 2020
19	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
21	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka (Koreksi) Ownership Report or Any Change in Public Company Share Ownership (Correction)

Keterangan Description

FEBRUARI FEBRUARY

4	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Jan 2021 Monthly Report of Bank Raya Securities Holder Registration Period Jan 31, 2021
4	Laporan Hutang Valas Bank Raya Periode 31 Jan 2021 Bank Raya Foreign Currency Payable Report Period Jan 31, 2021
10	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Jan 2021 (Koreksi) Monthly Report of Bank Raya Securities Holder Registration Period Jan 31, 2021 (Correction)
23	Penyampaian Mata Acara RUPS Tahunan Submission of the Agenda of the Annual GMS

MARET MARCH

3	Penyampaian Bukti Iklan Pengumuman Rapat Umum Pemegang Saham Tahunan Submission of Proof of Advertisement Announcement of Annual General Meeting of Shareholders
3	Pengumuman Rapat Umum Pemegang Saham Tahunan Announcement of Annual General Meeting of Shareholders
2	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
4	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 28 Feb 2021 Monthly Report of Bank Raya Securities Holder Registration Period Feb 28, 2021
5	Laporan Hutang Valas Bank Raya Periode 28 Feb 2021 Report on Bank Raya's Foreign Exchange Debt for the Period of Feb 28, 2021
9	Laporan Hasil Pemeringkatan Tahunan Annual Rating Results Report
17	Penyampaian Perubahan Mata Acara RUPS Tahunan Submission of Changes to the Agenda of the Annual GMS
18	Pemanggilan Rapat Umum Pemegang Saham Tahunan Invitation to the Annual General Meeting of Shareholders
18	Penyampaian Bukti Iklan Pemanggilan Rapat Umum Pemegang Saham Tahunan Submission of Proof of Advertisement Invitation to the Annual General Meeting of Shareholders
24	Laporan Informasi atau Fakta Material Periode Pelaksanaan MESOP Material Information or Facts Report MESOP Implementation Period
28	Laporan Informasi atau Fakta Material Periode Pelaksanaan MESOP (Koreksi) Material Information or Facts Report MESOP Implementation Period (Correction)

APRIL APRIL

5	Laporan Bulanan Registrasi Pemegang Efek PT Bank Rakyat Indonesia Agroniaga Tbk. Periode 31 Maret 2021. Monthly Report on Registration of Securities Holders of PT Bank Rakyat Indonesia Agroniaga Tbk. March 31, 2021 period.
5	Perubahan Komite Audit Audit Committee Changes
7	Penyampaian Bukti Iklan Informasi Laporan Keuangan Tahunan Submission of Proof of Advertising Information on Annual Financial Statements
7	Penyampaian Laporan Tahunan dan Laporan Keberlanjutan Submission of Annual Report and Sustainability Report

Keterangan Description	
7	Penyampaian Laporan Tahunan dan Laporan Keberlanjutan (Koreksi) Submission of Annual Report and Sustainability Report (Correction)
7	Penyampaian Laporan Tahunan dan Laporan Keberlanjutan (Koreksi) Submission of Annual Report and Sustainability Report (Correction)
8	Laporan Bulanan Registrasi Pemegang Efek PT Bank Rakyat Indonesia Agroniaga Tbk. Periode 31 Maret 2021. (Koreksi) Monthly Report on Registration of Securities Holders of PT Bank Rakyat Indonesia Agroniaga Tbk. Period March 31, 2021. (Correction)
8	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Maret 2021. (Koreksi) Monthly Report of Bank Raya Securities Holder Registration Period March 31, 2021. (Correction)
13	Perubahan Pengurus Management Change
13	Penyampaian Bukti Iklan Hasil RUPS Tahunan Submission of Proof of Advertising Results of the Annual GMS
13	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
13	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
14	Laporan Hutang Valas Bank Raya Periode 31 Maret 2021 Bank Raya Foreign Currency Payable Report Period March 31, 2021
15	Ringkasan Risalah Rapat RUPST Summary of Minutes of AGMS Rapat
MEI MAY	
3	Laporan Informasi atau Fakta Material Perubahan Anggaran Dasar Reports of Material Information or Facts on Changes to the Articles of Association
4	Penyampaian Bukti Iklan Informasi Laporan Keuangan Interim TW I Tahun 2021 Submission of Proof of Advertisement Information on Interim Financial Statements for the first quarter of 2021
6	Laporan Hutang Valas Bank Raya Periode 30 April 2021 Bank Raya's Foreign Currency Payable Report Period April 30, 2021
7	Perubahan Komite Audit Audit Committee Changes
10	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 30 April 2021 Monthly Report of Bank Raya Securities Holder Registration Period 30 April 2021
21	Penjelasan atas Pemberitaan Media Massa Explanation of Mass Media Coverage
27	Laporan Hasil Pelaksanaan Konversi ESOP MESOP ESOP MESOP Conversion Result Report
JUNI JUNE	
4	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Mei 2021 Monthly Report of Bank Raya Securities Holder Registration Period May 31, 2021
7	Laporan Hutang Valas Bank Raya Periode 31 Mei 2021 Bank Raya Foreign Currency Payable Report Period May 31, 2021
8	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Mei 2021 (Koreksi) Monthly Report of Bank Raya Securities Holder Registration Period May 31, 2021 (Correction)

Keterangan Description

JULI JULY

1	Laporan Informasi atau Fakta Material Penjelasan Mengenai Volatilitas Transaksi Efek Report of Material Information or Facts Explanation of the Volatility of Securities Transactions
2	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
6	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 30 Juni 2021 Monthly Report of Bank Raya Securities Holder Registration Period 30 June 2021
6	Laporan Hutang Valas Bank Raya Periode 30 Juni 2021 Report on Bank Raya's Foreign Exchange Debt for the Period of June 30, 2021
9	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
9	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
13	Risalah Rapat RUPST Minutes of AGMS Meeting
19	Laporan Informasi atau Fakta Material Perubahan Anggaran Dasar Reports of Material Information or Facts on Changes to the Articles of Association
27	Permohonan Pemenuhan Warkat Saham (<i>Script</i>) sebesar 1% Request for Fulfillment of Shares (<i>Script</i>) by 1%
30	Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya Request for Explanation of Issuers and Other Public Companies

AGUSTUS AUGUST

6	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Juli 2021 Monthly Report of Bank Raya Securities Holder Registration Period July 31, 2021
6	Laporan Hutang Valas Bank Raya Periode 31 Juli 2021 Bank Raya's Foreign Currency Payable Report for the Period of July 31, 2021
9	Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya Request for Explanation of Issuers and Other Public Companies
9	Penyampaian Bukti Iklan Informasi Laporan Keuangan Interim TW II Tahun 2021 Submission of Proof of Advertisement Information on Interim Financial Statements for TW II 2021
10	Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya Request for Explanation of Issuers and Other Public Companies
13	Penyampaian Mata Acara RUPSLB Submission of the EGMS Agenda
19	Pengumuman RUPSLB EGMS Announcement
19	Penyampaian Bukti Iklan Keterbukaan Informasi Rencana Penambahan Modal Submission of Proof of Information Disclosure of Information on the Plan of Capital Increase
19	Penyampaian Bukti Iklan RUPSLB Submission of Proof of EGMS Advertisement
19	Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya Request for Explanation of Issuers and Other Public Companies

Keterangan Description	
19	Laporan Informasi atau Fakta Material Rencana Penambahan Modal dengan HMETD Report of Information or Material Facts on Plans for Capital Increase with Pre-emptive Rights
25	Penyampaian Bukti Iklan Informasi Penawaran Umum Terbatas Submission of Proof of Advertising Information Limited Public Offer
25	Laporan Informasi atau Fakta Material Perubahan dan/atau Tambahan Informasi Reports of Information or Material Facts Changes and/or Additional Information
27	Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka Ownership Report or Any Change in Public Company Share Ownership
SEPTEMBER SEPTEMBER	
3	Penyampaian Bukti Iklan Pemanggilan RUPSLB Submission of Proof of the EGMS Summons Advertisement
3	Pemanggilan RUPSLB EGMS summons
6	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 30 Agustus 2021 Monthly Report of Bank Raya Securities Holder Registration Period August 30, 2021
6	Laporan Hutang Valas Bank Raya Periode 30 Agustus 2021 Bank Raya's Foreign Currency Debt Report for the Period of August 30, 2021
7	Pemanggilan RUPSLB (Koreksi) Invitation to the EGMS (Correction)
13	Rencana Penyelenggaraan <i>Public Expose</i> Tahunan Annual Public Expose Plan
20	Laporan Hasil Pelaksanaan Konversi ESOP MESOP ESOP MESOP Conversion Result Report
22	Penyampaian Materi <i>Public Expose</i> Tahunan Submission of Annual Public Expose Materi
24	Permohonan Klarifikasi atas Jadwal PUT Dalam Rangka Penambahan Modal PMHMETD IX Request for Clarification on the Schedule of PUT in the Context of Additional Capital for PMHMETD IX
24	Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya Request for Explanation of Issuers and Other Public Companies
28	Laporan Informasi atau Fakta Material Permintaan Penjelasan atas Pemberitaan Media Massa Reports of Material Information or Facts Request for Explanation of Mass Media Reports
29	Laporan Hasil <i>Public Expose</i> Tahunan Annual Public Expose Results Report
29	Penyampaian Bukti Iklan Hasil RUPSLB Submission of Proof of EGMS Results Advertisement
29	Ringkasan Risalah RUPSLB Summary of Minutes of EGMS
29	Laporan Informasi atau Fakta Material Perubahan Anggaran Dasar Reports of Material Information or Facts on Changes to the Articles of Association
30	Laporan Informasi atau Fakta Material Prospektus Ringkas PMHMETD IX Information or Facts Report on PMHMETD Condensed Prospectus IX

Keterangan Description	
OKTOBER OCTOBER	
5	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Sep 2021 Monthly Report of Bank Raya Securities Holder Registration Period Sep 31, 2021
6	Laporan Hutang Valas Bank Raya Periode 31 Sep 2021 Bank Raya Foreign Currency Payable Report Period Sep 31, 2021
NOVEMBER NOVEMBER	
4	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 30 Okt 2020 Monthly Report of Bank Raya Securities Holder Registration Period Oct 30, 2020
4	Laporan Hutang Valas Bank Raya Periode 30 Okt 2021 Bank Raya Foreign Exchange Debt Report Period Oct 30, 2021
9	Penyampaian Bukti Iklan Pengumuman Perubahan Nama Submission of Proof of Name Change Announcement Advertisement
16	Penyampaian Bukti Iklan Pengumuman Perubahan Logo Submission of Proof of Advertisement Announcement of Logo Change
16	Permohonan Perubahan Nama Saham Tercatat di Bursa Efek Application for Change of Name of Shares Listed on the Stock Exchange
18	Permintaan Penjelasan Emiten dan Perusahaan Publik Lainnya Request for Explanation of Issuers and Other Public Companies
19	Permohonan Perubahan Nama Saham Tercatat Application for Change of Name of Listed Share
19	Permohonan Pencatatan Saham Share Listing Application
19	Keterbukaan Informasi Terkait Aksi Korporasi Information Disclosure Related to Corporate Action
19	Penyampaian Prospektus Submission of Prospectus
19	Penyampaian Bukti Iklan Laporan Keuangan Triwulan III Tahun 2021 Submission of Proof of Advertisement for Quarter III Financial Statements of 2021
19	Penyampaian Bukti Iklan Tambahan Informasi Dalam Rangka PMHMETD IX Tahun 2021 Submission of Proof of Additional Advertising Information for PMHMETD IX Year 2021
19	Laporan Informasi atau Fakta Material Tambahan Informasi atas Keterbukaan Informasi dalam rangka PMHMETD IX tahun 2021 Additional Material Information or Facts Report Information on Information Disclosure in the context of PMHMETD IX 2021
19	Laporan Informasi atau Fakta Material Laporan Keuangan Triwulan III Tahun 2021 Material Information or Facts Report on the Quarter III Financial Statements of 2021
22	Laporan Informasi atau Fakta Material Laporan Keuangan Triwulan III Tahun 2021 (Koreksi) Material Information or Facts Report on the 2021 Quarter III Financial Statements (Correction)
22	Penyampaian Bukti Iklan Prospektus dalam rangka PMHMETD IX Submission of Proof of Prospectus Advertising for PMHMETD IX

Keterangan
Description

DESEMBER
DECEMBER

7	Laporan Bulanan Registrasi Pemegang Efek Bank Raya Periode 31 Nov 2021 Monthly Report on Registration of Bank Raya Securities Holders for the Period of Nov 31, 2021
7	Laporan Hutang Valas Bank Raya Periode 31 Nov 2021 Bank Raya Foreign Currency Payable Report Period Nov 31, 2021
17	Perubahan Alamat/No Telp/Fax/E-Mail/Website/NPWP/NPKP Change of Address/Phone Number/Fax/E-Mail/Website/NPWP/NPKP

Pengelolaan Informasi Information Management

Pengelolaan arus informasi keluar dan masuk perusahaan dapat dikelola dan telah ditunjuk juru bicara perusahaan yang bertindak mewakili perusahaan dalam menyampaikan informasi manajemen kepada *stakeholder*.

Setiap informasi yang disampaikan oleh juru bicara perusahaan merupakan informasi resmi dari perusahaan. Yang bertindak sebagai juru bicara perusahaan adalah:

1. Direktur utama
2. Direksi
3. Kepala divisi sekretariat perusahaan (*Corporate Secretary*/divisi SKP)

Diluar jabatan tersebut, beberapa pejabat juga diberikan kewenangan untuk memberikan informasi kepada pihak yang berkepentingan, namun memiliki lingkup terbatas. Pejabat yang dimaksud adalah:

1. Kepala bagian komunikasi perusahaan dan pemasaran bertindak sebagai juru bicara perusahaan, atas izin dari direksi dan/atau kepala divisi sekretariat perusahaan
2. Kepala divisi mempunyai kewenangan untuk memberikan informasi kepada pihak yang berkepentingan namun terbatas pada bidang unit kerjanya.
3. Pemimpin cabang mempunyai kewenangan untuk memberikan informasi kepada pihak yang berkepentingan namun terbatas pada bidang unit kerjanya dan wilayah kerja yang menjadi tanggung jawabnya. Penyampaian informasi harus memperhatikan ketentuan dan perundangan yang berlaku untuk perbankan, pasar modal dan konsumen. Pengelolaan informasi yang sifatnya umum dapat disampaikan kepada publik, kecuali :
 - a) Berita negatif Perusahaan;
 - b) Informasi yang melanggar ketentuan sebagai perusahaan terbuka;
 - c) Informasi yang menyangkut kerahasiaan bank yang diatur oleh perundang-undangan.

Management of the flow of information in and out of the company can be managed and a company spokesperson has been appointed to act on behalf of the company in conveying management information to stakeholders.

Any information submitted by a company spokesperson is official information from the company. Acting as a spokesperson for the company are:

1. President Director
2. Board of Directors
3. Head of the Company secretariat division (*Corporate Secretary*/SKP Division)

Outside of these positions, several officials are also given the authority to provide information to interested parties, but have a limited scope. The officials in question are:

1. The head of corporate communications and marketing acts as a spokesperson for the company, with the permission of the board of directors and/or the head of the company secretariat division
2. The division head has the authority to provide information to interested parties but is limited to the field of work unit.
3. Branch leaders have the authority to provide information to interested parties but are limited to the areas of their work units and work areas that are their responsibility. Submission of information must take into account the applicable laws and regulations for banking, capital markets and consumers. Management of general information can be submitted to the public, except:
 - a) Company negative news;
 - b) Information that violates the provisions as a public company;
 - c) Information regarding bank secrecy regulated by legislation.

Ketersediaan data dan akses informasi bank membuat ketersediaan data dan informasi berdasarkan data center yang dapat diakses oleh setiap karyawan. Bank juga menyediakan data dan informasi melalui *situs web*, *webmail* yang dapat diakses oleh pihak-pihak terkait misalnya pelanggan, mitra, dan umum.

Bank berkomitmen untuk melaksanakan prinsip keterbukaan, untuk itu bank selalu menyampaikan informasi melalui *situs web* bank, yaitu www.Bankraya.co.id. Selain itu, bank juga menyampaikan perkembangan dan kemajuan mengenai informasi material dan keterbukaan informasi yang perlu diketahui publik secara teratur kepada Bursa Efek Indonesia dan Otoritas Jasa Keuangan sesuai dengan peraturan pasar modal yang berlaku, seperti yang telah disampaikan di atas.

Kontak Hubungan Investor:

- Divisi Sekretariat Perusahaan di Gedung Bank Raya, Lt. 5 Jl. Warung Jati Barat No. 139
- Telp : +62 21 7919 9980/ +62 21 8066 7600
- Faks: +62 21 7919 9950
- Email : investor.relation@bankraya.co.id
- Call Center : 1500 494

Ragam Media Bank Kepada Pemegang Saham Dan Pemangku Kepentingan

The availability of data and access to bank information makes data and information available based on a data center that can be accessed by every employee. The Bank also provides data and information through websites, webmail which can be accessed by related parties such as customers, partners, and the general public.

The bank is committed to implementing the principle of openness, for that the bank always conveys information through the bank's website, namely www.Bankraya.co.id. In addition, the bank also conveys developments and progress regarding material information and information disclosure that the public needs to know regularly to the Indonesia Stock Exchange and the Financial Services Authority in accordance with the applicable capital market regulations, as stated above.

Investor Relations Contact:

- Corporate Secretariat Division at Bank Raya Building, Lt. 5 Jl. Warung Jati Barat No. 139
- Tel : +62 21 7919 9980/ +62 21 8066 7600
- Fax: +62 21 7919 9950
- Email : investor.relation@bankraya.co.id
- Call center : 1500 494

Variety of Bank Media to Shareholders and Stakeholders

Pemangku Kepentingan Stakeholders	Bentuk-bentuk Media Media Forms
Regulator Regulator	SPE-IDXNet
Pemegang Saham Shareholders	Rapat Umum Pemegang Saham, <i>Public Expose</i> General Meeting of Shareholders, Public Expose
Investor Investors	<i>Conference Call</i> , <i>Investor Meeting</i> , <i>Company Update</i> Conference Call, Investor Meeting, Company Update
Lembaga Publik Public Institution	<i>Annual Report</i> , <i>Company Profile</i> Annual Report, Company Profile
Konsumen Consumer	<i>Call Center</i> , <i>Media Sosial</i> Call Center, Social Media
Karyawan Employee	Agropos, I-SDM, Buletin AGRO Agropos, I-HR, AGRO Bullet Bulletin
Perusahaan Sejenis Lainnya Other Similar Companies	Media Sosial, Media Cetak, Media Elektronik, <i>Media Online</i> Social Media, Print Media, Electronic Media, Online Media
Mitra Kerja dan Rekanan Partners and Partners	Media Sosial, Media Cetak, Media Elektronik, <i>Media Online</i> Social Media, Print Media, Electronic Media, Online Media
Organisasi Profesi Professional Organization	Media Sosial, Media Cetak, Media Elektronik, <i>Media Online</i> Social Media, Print Media, Electronic Media, Online Media
Masyarakat/Umum General public	Media Sosial, Media Cetak, Media Elektronik, <i>Media Online</i> Social Media, Print Media, Electronic Media, Online Media

Laporan Harta Kekayaan Penyelenggara Negara (LHKPN)

State Administrative Assets Report (LHKPN)

Prinsip Dasar laporan harta Kekayaan Penyelenggara negara LHKPN merupakan daftar seluruh Harta Kekayaan penyelenggara negara yang dituangkan dalam formulir LHKPN yang ditetapkan oleh Komisi Pemberantasan Korupsi (KPK) sebagaimana yang diatur dalam Keputusan KPK No. Kep 07/KPK/02/2005 tentang tata Cara pendaftaran, pemeriksaan dan pengumuman Laporan Harta Kekayaan penyelenggara negara. Undang-Undang No. 30 tahun 2002 tentang Komisi pemberantasan tindak pidana korupsi menegaskan wewenang KPK melaksanakan langkah atau upaya pencegahan korupsi antara lain melalui pendaftaran dan pemeriksaan terhadap LHKPN. Selain itu, undang-undang No. 28 tahun 1999 tentang penyelenggara negara Yang Bersih dan Bebas dari Korupsi, Kolusi, dan nepotisme, mengamanatkan bahwa setiap penyelenggara wajib melaporkan dan mengumumkan Harta Kekayaannya sebelum dan setelah memegang jabatan serta bersedia diperiksa kekayaannya sebelum dan setelah menjabat. Dalam Undang-Undang No. 28 tahun 1999 pasal 2 (7) beserta penjelasannya, diuraikan bahwa pejabat lain yang memiliki fungsi strategis dalam kaitannya dengan penyelenggara negara termasuk Dewan Komisaris, Direksi, dan pejabat struktural lainnya pada Badan Usaha Milik Negara (BUMN) dan Badan Usaha Milik Daerah (BUMD). Pemeriksaan LHKPN yang disampaikan kepada kpk bertujuan untuk mewujudkan penyelenggara negara yang menaati asas-asas umum penyelenggara negara yang bebas dari praktik korupsi, kolusi, dan nepotisme, serta perbuatan tercela lainnya. Setiap penyelenggara negara dituntut untuk melaporkan kekayaannya melalui formulir LHKPN yang telah disediakan KPK untuk diisi secara jujur, benar dan lengkap, agar KPK dapat menganalisis, mengevaluasi, serta menilai atas seluruh jumlah, jenis dan nilai Harta Kekayaan yang dilaporkan, secara benar, cepat, tepat, akurat dan bertanggung jawab.

LHKPN wealth report is a list of all state administrators' assets as outlined in the LHKPN form determined by the Corruption Eradication Commission (KPK) as regulated in KPK Decree No. Kep 07/ KPK / 02/2005 concerning procedures for registration, examination and announcement of the State Administrator's Assets Report. Law No. 30 of 2002 concerning the Commission for the Eradication of Corruption Crimes emphasizes the authority of the KPK to carry out steps or efforts to prevent corruption, among others, through registration and examination of LHKPN . In addition, law no. 28 of 1999 concerning state administrators who are clean and free from corruption, collusion and nepotism, mandates that every administrator is obliged to report and announce his assets before and after taking office and is willing to have his wealth checked before and after taking office. In Law no. 28 of 1999 article 2 (7) along with its explanation, it is explained that other officials who have strategic functions in relation to state administrators include the Board of Commissioners, Directors, and other structural officials in State-Owned Enterprises (BUMN) and Regional-Owned Enterprises (BUMD). . The LHKPN examination submitted to the KPK aims to create state administrators who adhere to the general principles of state administrators who are free from practices of corruption, collusion, and nepotism, as well as other disgraceful acts. Every state administrator is required to report his wealth through the LHKPN form provided by the KPK to be filled out honestly, correctly and completely, so that the KPK can analyze, evaluate, and assess the entire amount, type and value of the reported Assets, correctly, quickly and accurately, accurate and responsible.

Dasar hukum Legal Basis

Dalam menerapkan LHKPN, perusahaan menimbang beberapa dasar hukum dan peraturan sebagai landasan cara pandang penerapan LHKPN di lingkungan perusahaan. Dasar hukum tersebut yaitu:

1. Undang-Undang No. 28 tahun 1999 tentang penyelenggara negara Yang Bersih dan Bebas dari Korupsi, Kolusi, dan nepotisme.
2. Undang-Undang No. 30 tahun 2002 tentang Komisi pemberantasan tindak pidana Korupsi.
3. Peraturan Menteri negara BUMN No. PER 01/ BUMN /2011 tentang penerapan Tata Kelola Perusahaan yang Baik pada BUMN, dan perubahannya.
4. Keputusan Sekretaris Menteri BUMN No. SK-16/S.MBU/2012 tentang Indikator/parameter penilaian dan evaluasi atas penerapan GCG yang baik.

In implementing LHKPN , the company considers several legal and regulatory bases as the basis for the perspective of implementing LHKPN in the company's environment. The legal basis are:

1. Law No. 28 of 1999 concerning state administrators who are clean and free from corruption, collusion and nepotism.
2. Law No. 30 of 2002 concerning the Corruption Eradication Commission.
3. Regulation of the Minister of State-Owned Enterprises No. P ER 01/ BUMN/2011 concerning the implementation of Good Corporate Governance in BUMN, and its changes.
4. Decree of the Secretary of the Minister of SOEs No. SK-16/S. MBU/2012 concerning indicators/parameters of assessment and evaluation of good GCG implementation.

Kebijakan LHKPN

LHKPN Policy

Untuk meningkatkan transparansi, pencegahan korupsi dan mendukung budaya bersih dari korupsi, kolusi dan nepotisme, maka Bank Raya menginduk pada peraturan BRI sebagai perusahaan induk untuk melaporkan Harta Kekayaan. Pelaporan diwajibkan untuk Dewan Komisaris, Direksi dan pejabat Bank Raya minimal setingkat *Vice President*.

To increase transparency, prevent corruption and support a clean culture of corruption, collusion and nepotism, Bank Raya relies on BRI regulations as the holding company for reporting assets. Reporting is required for the Board of Commissioners, Board of Directors and Bank Raya officials at the minimum level of vice president.

Pelaporan LHKPN Pejabat Perusahaan Tahun 2021

LHKPN Reporting for Company Officials in 2021

Untuk meningkatkan transparansi, pencegahan korupsi dan mendukung budaya bersih dari korupsi, kolusi dan nepotisme, maka Bank Raya menginduk pada peraturan BRI sebagai perusahaan induk untuk melaporkan Harta Kekayaan. Pelaporan diwajibkan untuk Dewan Komisaris, Direksi dan Pejabat Bank Raya minimal setingkat *Vice President*.

To increase transparency, prevent corruption and support a clean culture of corruption, collusion and nepotism, Bank Raya relies on BRI regulations as the holding company for reporting assets. Reporting is required for the Board of Commissioners, Directors and Officers of Bank Raya at least at the Vice President level.

Bank Raya telah menyampaikan laporan LHKPN untuk periode laporan tahun 2020 yang dilaporkan pada tahun 2021 untuk Dewan Komisaris, Direksi dan level SVP/Kepala Divisi.

Bank Raya has submitted the LHKPN report for the 2020 reporting period to be reported in 2021 for the Board of Commissioners, Board of Directors and SVP/Division Head level.

Transparansi Praktik *Bad Governance*

Transparency of Bad Governance Practices

Penerapan *Good Corporate Governance* di Bank Raya selalu ditingkatkan dari tahun ke tahun dengan melakukan banyak perbaikan dan perubahan kebijakan yang disesuaikan dengan kondisi Perusahaan, kondisi ekonomi dan dunia perbankan khususnya. Bank Raya menyadari bahwa praktik-praktik *bad corporate governance* akan mengganggu sistem Tata Kelola yang Baik (GCG) yang telah dibangun, karenanya Bank tidak melakukan segala tindakan yang bertentangan dengan aturan serta kebijakan terkait GCG antara lain :

Laporan Atas Kegiatan Perusahaan yang Mencemari Lingkungan

Sebagai perusahaan yang bergerak dalam bidang perbankan, Bank Raya tidak memiliki kegiatan yang mencemari Lingkungan serta berkomitmen untuk senantiasa mendukung program Go Green Grup BRI.

Perkara Penting yang Sedang Dihadapi Oleh Perusahaan,

Sepanjang tahun 2021, Bank tidak memiliki permasalahan hukum baik terhadap Perseroan, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat.

Kepatuhan Dalam Pemenuhan Kewajiban Perpajakan

Bank Raya telah memenuhi kewajiban perpajakan sebagaimana tercatat dalam Laporan Keuangan Audited Bank Raya tahun 2021.

Kesesuaian Penyajian Laporan Tahunan Dan Laporan Keuangan Dengan Peraturan Yang Berlaku dan SAK

Seluruh penyusunan Laporan Tahunan dan Laporan Keuangan telah disesuaikan dengan peraturan dan perundang-undangan yang berlaku.

Laporan Tahunan Bank telah menginformasikan mengenai laporan manajemen Bank mencakup pelaksanaan tugas, tantangan dan capaian sepanjang tahun 2021 dan telah disusun dengan mengacu pada Peraturan Otoritas Jasa Keuangan Nomor 29 /POJK.04/2016 Tentang Laporan Tahunan Emiten Atau Perusahaan Publik.

Laporan Keuangan Tahunan Bank Raya juga memberikan informasi pencatatan dari segala transaksi yang berkaitan dengan dana pihak ketiga, kredit, pembelian dan penjualan secara detail dan perhitungan yang akurat selama satu tahun dan merupakan hasil pertanggungjawaban manajemen atas penggunaan sumber daya yang dipercayakan kepada mereka. Oleh karenanya penyusunan laporan keuangan dibuat sesuai dengan Standar Akuntansi Keuangan yang berlaku.

Application Good Corporate Governance at Bank Raya is always improved from year to year by making many improvements and changes to policies that are adapted to the conditions of the Company, economic conditions and the banking world in particular. Bank Raya realizes that bad corporate governance practices will disrupt the Good Governance (GCG) system that has been built, therefore the Bank does not take any actions that are contrary to the rules and policies related to GCG, including:

Report on Company Activities Polluting the Environment

As a company engaged in banking, Bank Raya does not have activities that pollute the environment and is committed to always supporting the BRI Group's Go Green program.

Important Cases Being Faced by the Company,

Throughout 2021, the Bank did not have any legal problems either against the Company, members of the Board of Directors and/or members of the Board of Commissioners who are currently serving.

Compliance in Fulfilling Tax Obligations

Bank Raya has fulfilled its tax obligations as recorded in Bank Raya's 2021 Audited Financial Statements.

Conformity of the Presentation of Annual Reports and Financial Statements with Applicable Regulations and SAK

The entire preparation of the Annual Report and Financial Statements has been adjusted to the prevailing laws and regulations.

The Bank's Annual Report has informed the Bank's management report covering the implementation of tasks, challenges and achievements throughout 2021 and has been prepared with reference to the Financial Services Authority Regulation Number 29 / POJK .04/2016 concerning the Annual Report of Issuers or Public Companies.

Bank Raya's Annual Financial Report also provides recording information of all transactions related to third party funds, credit, purchases and sales in detail and accurate calculations for one year and is the result of management's accountability for the use of the resources entrusted to them. Therefore, the preparation of financial statements is made in accordance with the applicable Financial Accounting Standards.



Laporan Keuangan Tahunan yang berakhir pada 31 Desember 2021 juga telah diperiksa dan disahkan oleh Akuntan Publik yang ditunjuk oleh Perseroan yaitu KAP Purwantono, Sungkoro & Surja (STTD. KAP-03/PM.22/2018).

The Annual Financial Statements ending December 31, 2021 have also been examined and approved by a Public Accountant appointed by the Company, namely KAP Purwantono, Sungkoro & Surja (STTD. KAP-03/PM.22/2018).

Kasus Terkait Buruh dan Karyawan Cases Related to Labor and Employees

Sepanjang tahun 2021, Bank Raya tidak memiliki permasalahan baik pidana maupun perdata terkait buruh dan karyawan.

Throughout 2021, Bank Raya did not have any criminal or civil problems related to labor and employees.

Pengungkapan Segmen Operasi dalam Laporan Disclosure of Operating Segments in the Report

Dalam bab Analisis Pembahasan Manajemen telah diungkapkan berbagai segmen operasi yang dilakukan oleh Bank disertai dengan informasi pendapatan dan laba/rugi.

In the Management Discussion and Analysis chapter, various operating segments carried out by the Bank have been disclosed along with information on income and profit/loss.

Kesesuaian Antara Laporan Tahunan Salinan Cetak dengan Laporan Tahunan Salinan Elektronik Compatibility Between Printed Annual Reports and Electronic Copies of Annual Reports

Bank Raya senantiasa melakukan pengecekan sebelum mengunggah Laporan Tahunan dan memastikan kesesuaian data antara Laporan Tahunan *hardcopy* dengan *softcopy*.

Bank Raya always checks before uploading the Annual Report and ensures data conformity between the hardcopy and softcopy Annual Reports.

Tabel Eksposur Risiko

Risk Exposure Table

Pengungkapan Tagihan Bersih Berdasarkan Wilayah
Individual Disclosure of Receivables and Allowance Based on Region

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021						
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region						
		Jakarta	Indonesia Tengah & Timur	Jawa Barat	Jawa Tengah & DIY	Jawa Timur	Sumatera	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(10)
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	5.238.409	-	-	-	-	-	5.238.409
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	1.407.406	-	-	-	-	-	1.407.406
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	447.159	20	11	21	36	68	447.315
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	179.510	23.948	32.000	24.299	35.320	106.963	402.039
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	5.027	-	-	-	20.691	-	25.718
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	178.663	6.184	45.811	14.765	5.517	272.069	523.008
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/Claims on Micro, Small and Retail Portfolio	418.984	35.119	63.889	53.718	21.968	260.676	854.354
9.	Tagihan Kepada Korporasi/Claims on Corporate	6.362.168	42.687	45.091	84.266	97.051	450.697	7.081.959
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	1.830	765	323	225	518	1.266	4.927
11.	Aset Lainnya/Other Asset	292.028	1.152	9.892	4.597	2.480	27.608	337.757
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-	-
TOTAL		14.531.184	109.875	197.016	181.891	183.581	1.119.347	16.322.894

Pengungkapan Tagihan Bersih Berdasarkan Wilayah (Transaksi Rekening Administratif)

Individual Disclosure of Receivables and Allowance Based on Region (Administrative Account Transactions)

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/ December 31, 2021						
		Tagihan Bersih Berdasarkan Wilayah Net receivables based on region						
		Jakarta	Indonesia Tengah & Timur	Jawa Barat	Jawa Tengah & DIY	Jawa Timur	Sumatera	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(10)
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	-	-	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	970	-	-	-	-	-	970
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-	-	-
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	20	-	-	-	-	-	20
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-	-	-
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	-	-	-	-	-	-	40
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/Claims on Micro, Small and Retail Portfolio	3.102	186	483	1.029	974	3.214	8.989
9.	Tagihan Kepada Korporasi/Claims on Corporate	86.026	1.856	226	326	3.430	30.287	122.152
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	97	-	-	-	-	-	-
11.	Aset Lainnya/Other Asset	-	-	-	-	-	-	-
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-	-
TOTAL		90.215	2.042	709	1.356	4.404	33.541	132.170

Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu
Disclosure of Net Receivables based on Maturity Outstanding

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021					
		Tagihan bersih berdasarkan sisa jangka waktu kontrak Net invoice based on remaining contract term					
		< 1 tahun < 1 year	> 1 tahun s.d. 3 tahun > 1 year to 3 years	> 3 tahun s.d. 5 tahun > 3 years to 5 years	> 5 tahun > 5 years	Non Kontraktual Non Contractual	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Tagihan Kepada Pemerintah/ Claims on Sovereign	5.238.409	-	-	-	-	5.238.409
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	284.731	396.919	163.225	562.531	-	1.407.406
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	392.961	54.354	-	-	-	447.315
5.	Kredit Beragun Rumah Tinggal/ Secured by Residential Property	5.513	15.787	41.396	339.343	-	402.040
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	20.691	5.027	-	-	25.717
7.	Kredit Pegawai/Pensiunan/ Pensioners/employees loans	52.615	123.739	76.913	269.742	-	523.008
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	522.355	135.031	137.721	59.247	-	854.355
9.	Tagihan Kepada Korporasi/ Claims on Corporate	1.869.533	783.593	635.857	3.792.976	-	7.081.959
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	2.561	650	589	1.127	-	4.927
11.	Aset Lainnya/Other Asset	-	-	-	-	337.757	337.757
12.	Eksposur di Unit Syariah/ Exposure in Sharia Unit	-	-	-	-	-	-
TOTAL		8.368.678	1.530.764	1.060.728	5.024.967	337.757	16.322.894

Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu (Transaksi Rekening Administratif)
Disclosure of Net Receivables based on Maturity Outstanding (Administrative Account Transaction)

(dalam jutaan rupiah)/(in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/ December 31, 2021					
		Tagihan bersih berdasarkan sisa jangka waktu kontrak Net invoice based on remaining contract term					Total
		< 1 tahun < 1 year	> 1 tahun s.d. 3 tahun > 1 year to 3 years	> 3 tahun s.d. 5 tahun > 3 years to 5 years	> 5 tahun > 5 years	Non Kontraktual Non Contractual	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Tagihan Kepada Pemerintah/ Claims on Sovereign	-	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	970	-	-	-	-	970
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-	-
5.	Kredit Beragun Rumah Tinggal/ Secured by Residential Property	-	-	-	20	-	20
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-	-
7.	Kredit Pegawai/Pensiunan/ Pensioners/employees loans	-	40	-	-	-	40
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	8.761	211	17	-	-	8.989
9.	Tagihan Kepada Korporasi/ Claims on Corporate	103.145	222	-	18.785	-	122.152
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	97	-	-	-	-	-
11.	Aset Lainnya/Other Asset	-	-	-	-	-	-
12.	Eksposur di Unit Syariah/ Exposure in Sharia Unit	-	-	-	-	-	-
TOTAL		112.972	473	17	18.805	-	132.171

Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi
Disclosure of Receivables based on Economic Sectors

No.	Sektor Ekonomi Economic Sector			
		Tagihan Kepada Pemerintah Claims on Sovereign	Tagihan Kepada Entitas Sektor Publik Claims on Public Sector Entity	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Institute
(1)	(2)	(3)	(4)	(5)
1.	Pertanian, Kehutanan, dan perikanan/Agriculture, Forestry and Fisheries	-	514.501	-
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 Cold Air	-	59.701	-
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan Dan Daur Ulang Sampah/Water Management, Wastewater Management, Waste Management And Recycling	-	-	-
6.	Konstruksi/Construction	-	298.131	-
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor/ Wholesale and Retail; Car and Motorcycle Repair and Maintenance	-	-	-
8.	Pengangkutan dan Pergudangan/Transportation and Warehousing	-	-	-
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum/Accommodation, Food and Beverage	-	-	-
10.	Informasi dan Komunikasi/Information and Communication	-	-	-
11.	Aktivitas Keuangan dan Asuransi/Financial and Insurance Activity	-	446.849	-
12.	Real Estate/Real Estate	-	88.225	-
13.	Aktivitas Profesi, 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/Leasing and Leasing Activity without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	-	-
15.	Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib/Public Administration, Defense and Mandatory Social Insurance	-	-	-
16.	Pendidikan/Education	-	-	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial/Human Healthcare and Social Activity	-	-	-
18.	Kesenian, Hiburan, dan Rekreasi/Arts, Entertainment and Recreation	-	-	-
19.	Aktivitas Jasa Lainnya/Other Service Activity	-	-	-
20.	Aktivitas Rumah Tangga Sebagai Pemberi Kerja/Household As An Employer Activity	-	-	-
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya/International Agency And Other Suprstate Institution Activity	-	-	-
22.	Bukan Lapangan Usaha/Non-Business Sector	-	-	-
23.	Lainnya/Others	5.238.409	-	-
TOTAL		5.238.409	1.407.406	-

(dalam jutaan rupiah/in million rupiah)

31 Desember 2021/December 31, 2021

Tagihan Kepada Bank Claims on Bank	Kredit Beragun Rumah Tinggal Secured by Residential Property	Kredit Beragun Properti Komersial Secured by Commercial Real Estate	Tagihan Kepada Korporasi Claims on Corporate	Kredit Pegawai/ Pensiunan Pensioners/ employees loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Claims on Micro, Small and Retail Portfolio	Tagihan Yang Telah Jatuh Tempo Past due claims	Aset Lainnya Other Asset	Eksposur di Unit Syariah Exposure in Sharia Unit
(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
-	-	-	3.505.831	-	193.742	243	-	-
-	-	-	6.195	-	5.051	-	-	-
-	-	-	884.835	-	61.886	422	-	-
-	-	-	656.935	-	4.210	6	-	-
-	-	-	-	-	-	-	-	-
-	-	25.717	725.971	-	45.549	585	-	-
-	-	-	915.727	-	373.731	1.857	-	-
-	-	-	164.188	-	28.761	286	-	-
-	-	-	24.150	-	23.289	313	-	-
-	-	-	-	-	-	-	-	-
447.315	-	-	58.443	-	6.729	-	-	-
-	-	-	70.631	-	58.381	153	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	1.176	-	-	-
-	-	-	14.985	-	9.598	-	-	-
-	-	-	51.088	-	39.762	61	-	-
-	402.040	-	2.031	523.008	99	1.000	337.757	-
-	-	-	950	-	2.058	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	333	-	-	-
447.315	402.040	25.717	7.081.959	523.008	854.355	4.927	337.757	-

Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi (Transaksi Rekening Administratif)
Disclosure of Receivables based on Economic Sectors (Administrative Account Transactions)

No.	Sektor Ekonomi Economic Sector			
		Tagihan Kepada Pemerintah Claims on Sovereign	Tagihan Kepada Entitas Sektor Publik Claims on Public Sector Entity	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Institute
(1)	(2)	(3)	(4)	(5)
1.	Pertanian, Kehutanan, dan perikanan/Agriculture, Forestry and Fisheries	-	970	-
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 Cold Air	-	-	-
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan Dan Daur Ulang Sampah/Water Management, Wastewater Management, Waste Management And Recycling	-	-	-
6.	Konstruksi/Construction	-	-	-
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor/ Wholesale and Retail; Car and Motorcycle Repair and Maintenance	-	-	-
8.	Pengangkutan dan Pergudangan/Transportation and Warehousing	-	-	-
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum/Accommodation, Food and Beverage	-	-	-
10.	Informasi dan Komunikasi/Information and Communication	-	-	-
11.	Aktivitas Keuangan dan Asuransi/Financial and Insurance Activity	-	-	-
12.	Real Estate/Real Estate	-	-	-
13.	Aktivitas Profesi, 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/Leasing and Leasing Activity without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	-	-
15.	Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib/Public Administration, Defense and Mandatory Social Insurance	-	-	-
16.	Pendidikan/Education	-	-	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial/Human Healthcare and Social Activity	-	-	-
18.	Kesenian, Hiburan, dan Rekreasi/Arts, Entertainment and Recreation	-	-	-
19.	Aktivitas Jasa Lainnya/Other Service Activity	-	-	-
20.	Aktivitas Rumah Tangga Sebagai Pemberi Kerja/Household As An Employer Activity	-	-	-
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya/International Agency And Other Suprastate Institution Activity	-	-	-
22.	Bukan Lapangan Usaha/Non-Business Sector	-	-	-
23.	Lainnya/Others	-	-	-
TOTAL		-	970	-

(dalam jutaan rupiah/in million rupiah)

31 Desember 2021/December 31, 2021

	Tagihan Kepada Bank Claims on Bank	Kredit Beragun Rumah Tinggal Secured by Residential Property	Kredit Beragun Properti Komersial Secured by Commercial Real Estate	Tagihan Kepada Korporasi Claims on Corporate	Kredit Pegawai/ Pensiunan Pensioners/ employees loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Claims on Micro, Small and Retail Portfolio	Tagihan Yang Telah Jatuh Tempo Past due claims	Aset Lainnya Other Asset	Eksposur di Unit Syariah Exposure in Sharia Unit
	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
	-	-	-	26.253	-	1.754	-	-	-
	-	-	-	204	-	3	-	-	-
	-	-	-	26.943	-	382	-	-	-
	-	-	-	3	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	22.085	-	1.233	-	-	-
	-	-	-	37.035	-	3.593	-	-	-
	-	-	-	1.703	-	222	-	-	-
	-	-	-	209	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	3.695	-	-	-	-	-
	-	-	-	1.916	-	618	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	47	-	-	-
	-	-	-	2.106	-	1.135	-	-	-
	-	20	-	-	40	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	20	-	122.152	40	8.989	-	-	-

Pengungkapan Tagihan dan Pencadangan Berdasarkan Wilayah
Disclosure of Receivables and Provisioning Based on Area

(dalam jutaan rupiah/in million rupiah)

No.	Keterangan Description	31 Desember 2021/December 31, 2021						
		Tagihan Bersih Berdasarkan Wilayah Net Receivables based on Region						
		Jakarta	Indonesia Tengah & Timur	Jawa Barat	Jawa Tengah & DIY	Jawa Timur	Sumatera	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1.	Tagihan Receivables	9.671.280	120.207	208.565	195.548	188.955	1.223.771	11.608.327
2.	Tagihan yang mengalami peningkatan dan pemburukan risiko kredit (Stage 2 dan Stage 3) Receivables that recorded loan increased and decelerated risk Stage 2 and Stage 3)							-
a.	Belum jatuh tempo Not Yet Due	3.375.498	-	16.400	7.598	20.800	236.156	3.656.452
b.	Telah jatuh tempo Matured	435.950	6.793	2.215	1.999	4.064	10.578	461.598
3.	CKPN - Stage 1 Allowance for Impairment Losses - Stage 1	117.184	1.706	2.218	2.008	2.092	18.052	143.259
4.	CKPN - Stage 2 Allowance for Impairment Losses - Stage 2	1.133.413	3.770	16.806	14.495	2.252	104.737	1.275.472
5.	CKPN - Stage 3 Allowance for Impairment Losses - Stage 3	433.582	6.028	2.429	1.774	3.546	9.312	456.671
6	Tagihan yang dihapus buku Written-Off Claims	103.394	3.986	1.800	384.489	47.258	278.503	819.429

Pengungkapan Tagihan dan Cadangan - Berdasarkan Sektor Ekonomi
Disclosure of Receivables and Provisioning - based on Economic Sectors

(dalam jutaan rupiah/in million rupiah)

No.	Sektor Ekonomi Economy Sector	31 Desember 2021/December 31, 2021						
		Tagihan Receivable	Tagihan yang Mengalami Penurunan Nilai Receivables with Impairment Losses		Cadangan kerugian penurunan nilai (CKPN) - Stage 1 Individual Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) - Stage 2 Individual Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) - Stage 3 Individual Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Write-off Receivables
			Belum jatuh tempo Immature	Telah jatuh tempo Mature				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1.	Pertanian, Kehutanan, dan Perikanan Agriculture, Forestry and Fisheries	5.390.433	2.586.647	378.453	98.314	818.814	378.209	255.834
2.	Pertambangan dan Penggalian Mining and Exploration	11.747	-	-	80	421		-
3.	Industri pengolahan Manufacturing	1.107.281	365.370	3.749	4.358	152.453	3.327	72.590
4.	Pengadaan Listrik, Gas, Uap Air Panas dan Udara Dingin Electricity, Gas, Steam Hot Water and Cold air	726.264	-	57	4.848	414	50	51.765
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah Water Management, Wastewater Management, Waste Management And Recycling	-	-	-	-	-	-	-
6.	Konstruksi Construction	1.319.421	527.289	5.200	5.661	213.595	4.614	36.186
7.	Perdagangan besar dan eceran; Reparasi dan Perawatan Mobil dan Sepedea Motor Wholesale and Retail; Car and Motorcycle Repair and Maintenance	1.349.686	24.193	16.495	13.569	30.163	14.638	29.856
8.	Pengangkutan dan Pergudangan Transportation and Warehousing	246.292	7.598	46.747	2.063	4.533	46.461	317.515
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum Accomodation, Food and Beverage	52.996	-	2.776	434	2.346	2.464	33.361

(dalam jutaan rupiah/in million rupiah)

No.	Sektor Ekonomi Economy Sector	31 Desember 2021/ December 31, 2021						
		Tagihan Receivable	Tagihan yang Mengalami Penurunan Nilai Receivables with Impairment Losses		Cadangan kerugian penurunan nilai (CKPN) - Stage 1 Individual Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) - Stage 2 Individual Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) - Stage 3 Individual Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Write-off Receivables
			Belum jatuh tempo Immature	Telah jatuh tempo Mature				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
10.	Informasi dan Komunikasi Information and Communication	-	-	-	-	-	-	-
11.	Aktivitas Keuangan dan Asuransi Financial and Insurance Activity	94.239	56.642	-	523	28.544	-	-
12.	Real Estat Real Estate	224.437	88.713	1.355	2.409	3.547	1.202	6.937
13.	Aktivitas Profesi, 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 Leasing and Leasing Activity without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	-	-	-	-	-	-
15	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib Public Administration, Defense and Mandatory Social Insurance	-	-	-	-	-	-	-
16	Pendidikan Education	1.228	-	-	18	34	-	-
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Healthcare and Social Activity	26.254	-	-	291	1.380	-	-
18	Kesenian, Hiburan, dan Rekreasi Arts, Entertainment and Recreation	96.499	-	538	1.209	3.902	477	1.243

(dalam jutaan rupiah/in million rupiah)

No.	Sektor Ekonomi Economy Sector	31 Desember 2021/December 31, 2021						
		Tagihan Receivable	Tagihan yang Mengalami Penurunan Nilai Receivables with Impairment Losses		Cadangan kerugian penurunan nilai (CKPN) - Stage 1 Individual Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) - Stage 2 Individual Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) - Stage 3 Individual Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Write-off Receivables
			Belum jatuh tempo Immature	Telah jatuh tempo Mature				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
19	Aktivitas Jasa Lainnya Other Service Activity	958.138	-	6.228	9.475	14.924	5.228	14.141
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja Household as an Employer Activity	3.414	-	-	7	399	-	-
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International Agency and other Suprastate Institution Activity	-	-	-	-	-	-	-
22	Bukan Lapangan Usaha Non-Business Sector	-	-	-	-	-	-	-
23	Lainnya Others	-	-	-	-	-	-	-
TOTAL		11.608.327,40	3.656.451,79	461.598,36	143.258,90	1.275.471,51	456.671,05	819.428,85

Pengungkapan Rincian Mutasi Kerugian
Disclosure of Allowance Losses Mutation

(dalam jutaan rupiah/in million rupiah)

No.	Keterangan Description	31 Desember 2021/December 31, 2021		
		Tahap 1 Stage 1	Tahap 1 Stage 2	Tahap 1 Stage 3
(1)	(2)	(3)	(4)	(5)
1.	Saldo awal CKPN Allowance for Impairment Losses outstanding of period	267.581	290.626	477.528
2.	Pembentukan (pemulihan) CKPN pada periode berjalan (Net) Net Current Allowance (recovery) for impairment losses	-	-	-
2.a.	Pembentukan CKPN pada periode berjalan Allowance for impairment losses	718.374	2.756.953	2.207.758
2.b.	Pemulihan CKPN pada periode berjalan Recovery for impairment losses on current period	(842.696)	(1.772.107)	(126.112)
3.	CKPN yang digunakan untuk melakukan hapus buku atas tagihan pada periode berjalan Impairment losses for loan writing off on current period	-	-	(3.076.517)
4.	Pembentukan (pemulihan) lainnya pada periode berjalan Other allowance (recovery) on current period	-	-	974.014
Saldo Akhir CKPN		143.259	1.275.472	456.671

Pengungkapan Risiko Kredit Pihak Lawan - Transaksi Derivatif
Disclosure of Counterparty Credit Risk - Derivative Transactions

(dalam jutaan rupiah/in million rupiah)

No.	Variabel Yang Mendasari Underlying Variables	31 Desember 2021/December 31, 2021							
		Jumlah Nasional National Amount			Tagihan Derivatif Derivative Receivables	Kewajiban Derivatif Derivative Liabilities	Tagihan Bersih sebelum MRK Net Receivables Before MRK	MRK RWA	Tagihan Bersih setelah MRK Net Receivables After MRK
		< 1 tahun < 1 year	>1 tahun sd <5tahun >1 year to <5 years	> 5 tahun > 5 year					
1.	Suku Bunga Interest rate	-	-	-	-	-	-	-	-
2.	Nilai Tukar Exchange rate	-	-	-	-	-	-	-	-
3.	Saham Share	-	-	-	-	-	-	-	-
4.	Emas Gold	-	-	-	-	-	-	-	-
5.	Logam selain Emas Metal other than Gold	-	-	-	-	-	-	-	-
6.	Lainnya Others	-	-	-	-	-	-	-	-

Pengungkapan Risiko Kredit Pihak Lawan: Transaksi Repo Disclosure of Counterparty Risk Credit: Repo Transaction

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31,2021			
		Nilai Wajar SSB Repo Fair Value of Marketable Securities Repo	Kewajiban Repo Repo Obligations	Tagihan Bersih Net Receivables	ATMR RWA
1.	Tagihan Kepada Pemerintah Receivables on Sovereigns	-	-	-	-
2.	Tagihan kepada sektor publik Receivables on Public Sector Entities	-	-	-	-
3.	Tagihan Kepada Bank Multilateral dan Lembaga Internasional Receivables on Multilateral Development Banks and International Institution	-	-	-	-
4.	Tagihan Kepada Bank Receivables on Banks	-	-	-	-
5.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables on Micro, Small Business & Retail Portfolio	-	-	-	-
6.	Tagihan Kepada Korporasi Receivables on Corporate	-	-	-	-

Pengungkapan Risiko Kredit Pihak Lawan: Transaksi Reverse Repo - Bank secara Individual Disclosure of Counterparty Risk Credit: Repo Reverse Transaction- Bank Individually

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31,2021			
		Nilai Wajar SSB Repo Fair Value of Marketable Securities Repo	Kewajiban Repo Repo Obligations	Tagihan Bersih Net Receivables	ATMR RWA
1.	Tagihan Kepada Pemerintah Receivables on Sovereigns	650.378	-	-	-
2.	Tagihan kepada sektor publik Receivables on Public Sector Entities	-	-	-	-
3.	Tagihan Kepada Bank Multilateral dan Lembaga Internasional Receivables on Multilateral Development Banks and International Institution	-	-	-	-
4.	Tagihan Kepada Bank Receivables on Banks	-	-	-	-
5.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables on Micro, Small Business & Retail Portfolio	-	-	-	-
6.	Tagihan Kepada Korporasi Receivables on Corporate	-	-	-	-

Pengungkapan Tagihan Bersih Berdasarkan Bobot Risiko setelah Memperhitungkan Dampak Mitigasi Risiko Kredit
Disclosure of Net Receivables by Risk Weight after Credit Risk Mitigation

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/ December 31, 2021										ATMR RWA	Beban Modal Capital Expenses
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivable After Taking into account the Impact of Credit Risk Mitigation											
		0%	20%	25%	35%	40%	50%	75%	100%	150%			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
A. Eksposur Neraca/Balance Sheet Exposure													
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	4.588.031	-	-	-	-	-	-	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	-	-	-	-	-	1.407.406	-	-	-	-	703.703	56.296
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	447.315	-	-	-	-	-	-	-	-	89.463	7.157
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	-	-	78.966	-	-	-	-	-	-	-	132.817	10.625
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-	-	-	-	25.717	-	25.717	2.057
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	-	-	-	-	-	523.008	-	-	-	-	261.504	20.920
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	-	-	-	-	-	-	854.355	-	-	-	640.766	51.261
9.	Tagihan Kepada Korporasi/Claims on Corporate	-	-	-	-	-	41.163	-	7.040.796	-	-	7.061.378	564.910
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	-	-	-	-	-	-	-	-	4.927	-	7.391	591
11.	Aset Lainnya/Other Asset	15.239	-	-	-	-	-	-	-	316.749	5.769	325.403	26.032
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-	-	-	-	-	-	-
Total Eksposur Neraca		4.603.270	447.315	78.966	323.074	-	1.971.577	854.355	7.383.262	10.696	-	9.248.141	739.851
B. Eksposur Kewajiban Komitmen/Kontinjensi pada Transaksi Rekening Administratif/Exposure of Committed/Contingent Liability on Administrative Account Transactions													
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	-	-	-	-	-	-	-	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	-	-	-	-	-	970	-	-	-	-	485	39
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-	-	-	-	-	-	-	-
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	-	-	-	20	-	-	-	-	-	-	7	0.56
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-	-	-	-	-	-	-	-
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	-	-	-	-	-	40	-	-	-	-	20	2
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	-	-	-	-	-	-	8.989	-	-	-	6.742	539
9.	Tagihan Kepada Korporasi/Claims on Corporate	-	-	-	-	-	-	-	122.152	-	-	122.152	9.772
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	-	-	-	-	-	-	-	-	-	-	-	-
11.	Aset Lainnya/Other Asset	-	-	-	-	-	-	-	-	-	-	-	-
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-	-	-	-	-	-	-
Total Eksposur TRA		-	-	-	20	0	1.010	8.989	122.152	0	-	129.406	10.352
C. Eksposur akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)/Exposure due to Counterparty Credit Risk													
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	650.378	-	-	-	-	-	-	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	-	-	-	-	-	-	-	-	-	-	-	-
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-	-	-	-	-	-	-	-
5.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	-	-	-	-	-	-	-	-	-	-	-	-
6.	Tagihan Kepada Korporasi/Claims on Corporate	-	-	-	-	-	-	-	-	-	-	-	-
7.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-	-	-	-	-	-	-
Total Eksposur Counterparty Credit Risk/Total Counterparty Credit Risk Exposure		650.378	-	-	-	-	-	-	-	-	-	-	-



Pengungkapan Tagihan Bersih dan Teknik Mitigasi Risiko Kredit Disclosure of Net Receivables and Credit Risk Mitigation Technic

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021					
		Tagihan Bersih Net Receivable	Bagian Yang Dijamin Dengan Portion Secured With				Bagian Yang Tidak Dijamin Unsecured Portion
			Agunan Collateral	Garansi Warranty	Asuransi Kredit Credit Insurance	Lainnya Other	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(9)
A. Eksposur Neraca/Balance Sheet Exposure							
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	4.588.031	-	-	-	-	4.588.031
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	1.407.406	-	-	-	-	1.407.406
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	447.315	-	-	-	-	447.315
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	402.040	-	-	-	-	402.040
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	25.717	-	-	-	-	25.717
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	523.008	-	-	-	-	523.008
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	854.355	65.202	-	-	-	789.153
9.	Tagihan Kepada Korporasi/Claims on Corporate	7.081.959	89.001	-	-	-	6.992.958
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	4.927	-	-	-	-	4.927
11.	Aset Lainnya/Other Asset	337.757	-	-	-	-	337.757
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-
	Total Eksposur Neraca	15.672.515	154.203	-	-	-	15.518.312
B. Eksposur Kewajiban Komitmen/Kontinjensi pada Transaksi Rekening Administratif/Exposure of Committed/Contingent Liability on Administrative Account Transactions							
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	-	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	970	-	-	-	-	970
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-	-
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	20	-	-	-	-	20
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-	-
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	40	-	-	-	-	40
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	8.989	-	-	-	-	8.989
9.	Tagihan Kepada Korporasi/Claims on Corporate	122.152	-	-	-	-	122.152
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	-	-	-	-	-	-
11.	Aset Lainnya/Other Asset	-	-	-	-	-	-
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-
	Total Eksposur TRA	132.171	0	0	0	0	132.171
C. Eksposur akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)/Exposure due to Counterparty Credit Risk							
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	650.378	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	-	-	-	-	-	-
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-	-
5.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/ Claims on Micro, Small and Retail Portfolio	-	-	-	-	-	-
6.	Tagihan Kepada Korporasi/Claims on Corporate	-	-	-	-	-	-
7.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-	-
	Total Eksposur Counterparty Credit Risk/Total Counterparty Credit Risk Exposure	650.378	-	-	-	-	-

Eksposur Aset di Neraca
Balance Sheet Assets Exposures

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/ December 31, 2021		
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi risiko Kredit Net Receivables	ATMR Sebelum MRK RWA before Credit Risk Mitigation	ATMR Setelah MRK RWA after Credit Risk Mitigation
A.	Eksposur Neraca Balance Sheet Exposure			
1.	Tagihan Kepada Pemerintah Claims on Sovereign	4.588.031	-	-
2.	Tagihan Kepada Entitas Sektor Publik Claims on Public Sector Entity	1.407.406	703.703	703.703
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Institute	-	-	-
4.	Tagihan Kepada Bank Claims on Bank	447.315	78.713	78.713
5.	Kredit Beragun Rumah Tinggal Secured by Residential Property	402.040	132.818	132.818
6.	Kredit Beragun Properti Komersial Secured by Commercial Real Estate	25.717	25.717	25.717
7.	Kredit Pegawai/Pensiunan Pensioners/Employees Loans	523.008	261.504	261.504
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Claims on Micro, Small and Retail Portfolio	854.355	640.766	591.865
9.	Tagihan Kepada Korporasi Claims on Corporate	7.081.959	7.061.378	6.972.377
10.	Tagihan Yang Telah Jatuh Tempo Past due claims	4.927	7.391	7.391
11.	Aset Lainnya Other Asset	337.757	-	324.773
12.	Eksposur di Unit Syariah Exposure in Sharia Unit	-	-	-
	TOTAL EKSPOSUR NERACA TOTAL BALANCE SHEET EXPOSURE	15.672.515	8.911.990	9.098.861

Eksposur Kewajiban Komitmen/Kontinjensi pada Transaksi Rekening Administratif
Exposure on Off Balance Sheet Commitment/Contingency

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021		
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables	ATMR Sebelum MRK RWA before Credit Risk Mitigation	ATMR Setelah MRK RWA after Credit Risk Mitigation
A.	Eksposur Neraca Balance Sheet Exposure	970	485	485
1.	Tagihan Kepada Pemerintah Claims on Sovereign	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik Claims on Public Sector Entity	-	-	-
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Institute	20	7	7
4.	Tagihan Kepada Bank Claims on Bank	-	-	-
5.	Kredit Beragun Rumah Tinggal Secured by Residential Property	40	20	20
6.	Kredit Beragun Properti Komersial Secured by Commercial Real Estate	8.989	6.742	6.742
7.	Kredit Pegawai/Pensiunan Pensioners/Employees Loans	122.152	122.152	122.152
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Claims on Micro, Small and Retail Portfolio	-	-	-
9.	Tagihan Kepada Korporasi Claims on Corporate	-	-	-
10.	Tagihan Yang Telah Jatuh Tempo Past due claims	-	-	-
11.	Aset Lainnya Other Asset	-	-	-
12.	Eksposur di Unit Syariah Exposure in Sharia Unit	132.171	129.405	129.405
	TOTAL EKSPOSUR NERACA TOTAL BALANCE SHEET EXPOSURE	132.605	129.888	129.888

Eksposur Yang Menimbulkan Risiko Kredit Akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)

Exposures That Caused Credit Risk due to Failure of The Opposing Party

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021		
		Tagihan Bersih Net Claims	ATMR Sebelum MRK RWA pre CRM	ATMR Setelah MRK RWA post CRM
(1)	(2)	(3)	(4)	(5)
1.	Tagihan Kepada Pemerintah Claims on Sovereign	650.378	-	-
2.	Tagihan Kepada Entitas Sektor Publik Claims on Public Sector Entity	-	-	-
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Institute	-	-	-
4.	Tagihan Kepada Bank Claims on Bank	-	-	-
5.	Tagihan Kepada Korporasi Claims on Corporate	-	-	-
6.	Tagihan Kepada Entitas Sektor Publik Claims on Public Sector Entity	-	-	-
TOTAL		650.378	-	-

Eksposur yang Menimbulkan Risiko Kredit akibat Kegagalan Setelmen (settlement risk)

Exposures That Caused Credit Risk due to Settlement Failure

(dalam jutaan rupiah/in million rupiah)

No	Jenis Transaksi Transaction Type	31 Desember 2021/December 31, 2021		
		Nilai Eksposur Exposure	Faktor Pengurang Modal Capital Deduction Factor	ATMR RWA
(1)	(2)	(3)	(4)	(5)
1.	Delivery versus payment	-	-	-
a.	Beban Modal 8% (5-15 hari) 8% capital charge (5-15 days)	-	-	-
b.	Beban Modal 50% (16-30 hari) 50% capital charge (16-30 days)	-	-	-
c.	Beban Modal 75% (31-45 hari) 75% capital charge (31-40 days)	-	-	-
d.	Beban Modal 100% (lebih dari 45 hari) 100% capital charge (More than 45 days)	-	-	-
2.	Non-delivery versus payment	-	-	-
TOTAL		-	-	-

Total Pengukuran Risiko Kredit

Total Credit Risk Measurement

(dalam jutaan rupiah/in million rupiah)

	31 Desember 2021/December 31, 2021
TOTAL ATMR RISIKO KREDIT	9.228.267
TOTAL CREDIT RISK RWA	
TOTAL FAKTOR PENGURANG MODAL	-
TOTAL CAPITAL DEDUCTION FACTOR	

(dalam jutaan rupiah/in million rupiah)

No.	Jenis Risiko Types of Risk	31 Desember 2021/December 31, 2021	
		Bank	
		Beban Modal Capital Expense	ATMR RWA
1.	Risiko Suku Bunga Interest Rate Risk	-	-
	a. Risiko Spesifik Specific Risk	-	-
	b. Risiko Umum Public Risk	3.010	37.629
2.	Risiko Nilai Tukar Exchange rate risk	1.845	23.058
3.	Risiko Ekuitas Equity Risk	-	-
4.	Risiko Komoditas Commodity Risk	-	-
5.	Risiko Option Option Risk	-	-
TOTAL		4.855	60.687

Pengungkapan Risiko Operasional dengan Menggunakan Metode BIA

Operational Risk Disclosure by Using BIA Method

(dalam jutaan rupiah/in million rupiah)

No.	Pendekatan yang digunakan Approach Used	31 Desember 2021/December 31, 2021		ATMR RWA
		Pendekatan Bruto Rata-rata 3 tahun terakhir Average Gross Approach in the Past 3 year	Beban Modal Capital Expense	
1.	Pendekatan Indikator Dasar Basic Indicator Approach	733.625	110.044	1.375.546
TOTAL		733.625	110.044	1.375.546

9.1. PENGUNGKAPAN PROFIL MATURITAS Disclosure of Maturity Profiles

9.1.a Pengungkapan Profil Maturitas Rupiah - Bank Secara Individual Disclosure of Rupiah - Bank Maturity Profiles Individually

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021					
		Saldo Balance	Jatuh Tempo/ Past Due				
			≤ 1 bulan ≤ 1 Month	>1 bulan s.d 3 bulan >1 Month to 3 month	>3 bulan s.d 6 bulan > 3 Month to 6 month	> 6 bulan s.d 12 bulan > 6 Month to 12 month	> 12 bulan > 12 Month
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
I NERACA/BALANCE SHEET							
A. Aset/Assets							
	Kas/Cash	15.111	15.111	-	-	-	-
	Penempatan Pada Bank Indonesia/Placement with Bank Indonesia	1.892.534	1.892.534	-	-	-	-
	Penempatan pada Bank Lain/Placement with Other Banks	26.452	26.452	-	-	-	-
	Surat Berharga/Securities	3.570.663	7.347	99.700	371.254	94.923	2.997.439
-	Surat Berharga/Securities	3.570.663	7.347	99.700	371.254	94.923	2.997.439
-	Obligasi Rekapitalisasi Pemerintah/ Government Recapitalisation Bonds	-	-	-	-	-	-
-	Efek yg dibeli dg janji dijual kembali/ Securities purchased with the promise of resale	-	-	-	-	-	-
	Kredit yang diberikan/Credit given	10.393.947	256.707	781.401	556.306	1.018.993	7.780.540
-	Kredit yang diberikan (net setelah dikurangi CKPN)/Credit given (net after deducting CKPN)	10.393.947	256.707	781.401	556.306	1.018.993	7.780.540
-	Piutang pembiayaan syariah (net setelah dikurangi CKPN)/Sharia financing receivables (net after deducting CKPN)	-	-	-	-	-	-
-	Piutang sewa pembiayaan (net setelah dikurangi CKPN)/Finance lease receivables (net after deducting CKPN)	-	-	-	-	-	-
	Tagihan lainnya/Other Receivables	742.939	680.720	37.039	25.180	-	-
-	Giro Pada Bank Indonesia/Current Accounts with Bank Indonesia	742.939	680.720	37.039	25.180	-	-
-	Giro Pada Bank Lain/Current Accounts with Other Banks	-	-	-	-	-	-
-	Tagihan Wesel Ekspor/Export Draft Bill	-	-	-	-	-	-
-	Tagihan Derivatif/Derivative Claim	-	-	-	-	-	-
-	Tagihan Akseptasi/Acceptance Claims	-	-	-	-	-	-
	Lain-lain/Others	476.681	21.339	405.491	-	-	49.851
-	Penyertaan Saham/Share Inclusion	-	-	-	-	-	-
-	Aset Pajak Tangguhan/Deferred Tax Asset	-	-	-	-	-	-
-	Aset Tetap/Fixed Asset	-	-	-	-	-	-
-	Aset Lain-lain/Other Assets	476.681	21.339	405.491	-	-	49.851
	Total Aset/Total Asset	17.118.327	2.900.210	1.323.631	952.740	1.113.916	10.827.830
B. Kewajiban/Liabilities							
	Dana Pihak Ketiga/Third Funds Party	9.736.334	6.508.910	2.770.404	353.012	104.008	-
	Kewajiban pada Bank Indonesia/Liabilities to Bank Indonesia	-	-	-	-	-	-
	Kewajiban pada bank lain/Liabilities to Other Banks	2.005	2.005	-	-	-	-
	Surat berharga yang Diterbitkan/Securities Issued	238.863	-	-	-	238.863	-



(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/ December 31, 2021					
		Saldo Balance	Jatuh Tempo/Past Due				
			≤ 1 bulan ≤ 1 Month	>1 bulan s.d 3 bulan > 1 Month to 3 month	>3 bulan s.d 6 bulan > 3 Month to 6 month	> 6 bulan s.d 12 bulan > 6 Month to 12 month	> 12 bulan > 12 Month
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Pinjaman yang Diterima/Loans Received	16.589	-	-	-	-	16.589
	Kewajiban Lainnya/Other Liabilities	92.561	30.342	37.039	25.180	-	-
	- Liabilitas Segera/Immediate Liability	92.561	30.342	37.039	25.180	-	-
	- Liabilitas Derivatif/Derivative Liabilities	-	-	-	-	-	-
	- Liabilitas Akseptasi/Acceptances liabilities	-	-	-	-	-	-
	- Liabilitas Imbalan Kerja/Employee Benefits Liabilities	-	-	-	-	-	-
	- Efek yg dijual dg janji dibeli kembali/ Securities sold under agreement to repurchase	-	-	-	-	-	-
	Lain-lain/Others	248.082	9.243	180.190	-	-	58.649
	- Pinjaman Subordinasi/Subordinated Loans	-	-	-	-	-	-
	- Utang Pajak/Tax Debt	-	-	-	-	-	-
	- Lain-lain/Others	248.082	9.243	180.190	-	-	58.649
	Total Kewajiban/Total Liabilities	10.334.434	6.550.500	2.987.633	378.192	342.871	75.238
	Selisih Aset dengan Kewajiban dalam Neraca/ Difference between Assets and Liabilities in the Balance Sheet	6.783.893	(3.650.290)	(1.664.002)	574.548	771.045	10.752.592
II	REKENING ADMINISTRATIF/ADMINISTRATIVE ACCOUNT						
	A. Tagihan Rekening Administratif/ Administrative Account Bill						
	Komitmen/Commitment	-	-	-	-	-	-
	Kontijensi /Contingency	-	-	-	-	-	-
	Total Tagihan Rekening Administratif/Total Administrative Account Bills	-	-	-	-	-	-
	B. Kewajiban Rekening Administratif/ Administrative Account Liabilities						
	Komitmen/Commitment	528.838	80.937	189.319	96.733	161.849	-
	Kontijensi/Contingency	6.495	2.781	1.292	253	2.169	-
	Total Kewajiban Rekening Administratif/Total Administrative Account Bills	535.333	83.718	190.611	96.986	164.018	-
	Selisih Tagihan dan Kewajiban dalam Rekening Administratif/Difference between Claims and Liabilities in Administrative Accounts	(535.333)	(83.718)	(190.611)	(96.986)	(164.018)	-
	Selisih (IA-IB) + (IIA+IIB)/Difference (IA B)+ (IIA + IIB)	6.248.560	(3.734.008)	(1.854.613)	477.562	607.027	10.752.592
	Selisih Kumulatif/Cummulative Difference		(3.734.008)	(5.588.621)	(5.111.059)	(4.504.032)	6.248.560

9.2.a Pengungkapan Profil Maturitas Valas - Bank Secara Individual Disclosure of Foreign Currency - Bank Maturity Profiles

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/ December 31, 2021					
		Saldo Balance	Jatuh Tempo/Past Due				
			≤ 1 bulan ≤ 1 Month	>1 bulan s.d 3 bulan > 1 Month to 3 month	>3 bulan s.d 6 bulan > 3 Month to 6 month	> 6 bulan s.d 12 bulan > 6 Month to 12 month	> 12 bulan > 12 Month
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
I NERACA/BALANCE SHEET							
A. Aset/Assets							
	Kas/Cash	128	128	-	-	-	-
	Penempatan Pada Bank Indonesia/Placement with Bank Indonesia	39.693	39.693	-	-	-	-
	Penempatan pada Bank Lain/Placement with Other Banks	166.355	166.355	-	-	-	-
	Surat Berharga/Securities	101.606	-	71.790	29.816	-	-
-	Surat Berharga/Securities	101.606	-	71.790	29.816	-	-
-	Obligasi Rekapitalisasi Pemerintah/Government Recapitalisation Bonds	-	-	-	-	-	-
-	Efek yg dibeli dg janji dijual kembali/Securities purchased with the promise of resale	-	-	-	-	-	-
	Kredit yang diberikan/Credit given	1.214.370	-	28.505	21.564	-	1.164.301
-	Kredit yang diberikan (net setelah dikurangi CKPN)/Credit given (net after deducting CKPN)	1.214.370	-	28.505	21.564	-	1.164.301
-	Piutang pembiayaan syariah (net setelah dikurangi CKPN)/Sharia financing receivables (net after deducting CKPN)	-	-	-	-	-	-
-	Piutang sewa pembiayaan (net setelah dikurangi CKPN)/Finance lease receivables (net after deducting CKPN)	-	-	-	-	-	-
	Tagihan lainnya/Other Receivables	-	-	-	-	-	-
-	Giro Pada Bank Indonesia/Current Accounts with Bank Indonesia	-	-	-	-	-	-
-	Giro Pada Bank Lain/Current Accounts with Other Banks	-	-	-	-	-	-
-	Tagihan Wesel Eksport/Export Draft Bill	-	-	-	-	-	-
-	Tagihan Derivatif/Derivative Claim	-	-	-	-	-	-
-	Tagihan Akseptasi/Acceptance Claims	-	-	-	-	-	-
	Lain-lain/Others	1.525	-	-	-	-	1.525
-	Penyertaan Saham/Share Inclusion	-	-	-	-	-	-
-	Aset Pajak Tangguhan/Deferred Tax Asset	-	-	-	-	-	-
-	Aset Tetap/Fixed Asset	-	-	-	-	-	-
-	Aset Lain-lain/Other Assets	1.525	-	-	-	-	1.525
	Total Aset/Total Asset	1.523.678	206.177	100.295	51.380	-	1.165.826
B. Kewajiban/Liabilities							
	Dana Pihak Ketiga/Third Funds Party	1.031.225	813.832	17.060	200.333	-	-
	Kewajiban pada Bank Indonesia/Liabilities to Bank Indonesia	-	-	-	-	-	-
	Kewajiban pada bank lain/Liabilities to Other Banks	299.303	299.303	-	-	-	-
	Surat berharga yang Diterbitkan/Securities Issued	-	-	-	-	-	-

(dalam jutaan rupiah/in million rupiah)

No.	Kategori Portofolio Category of Portfolio	31 Desember 2021/December 31, 2021					
		Saldo Balance	Jatuh Tempo/ Past Due				
			≤ 1 bulan ≤ 1 Month	>1 bulan s.d 3 bulan > 1 Month to 3 month	>3 bulan s.d 6 bulan > 3 Month to 6 month	> 6 bulan s.d 12 bulan > 6 Month to 12 month	> 12 bulan > 12 Month
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Pinjaman yang Diterima/Loans Received	-	-	-	-	-	-
	Kewajiban Lainnya/Other Liabilities	-	-	-	-	-	-
	- Liabilitas Segera/Immediate Liability	-	-	-	-	-	-
	- Liabilitas Derivatif/Derivative Liabilities	-	-	-	-	-	-
	- Liabilitas Akseptasi/Acceptances liabilities	-	-	-	-	-	-
	- Liabilitas Imbalan Kerja/Employee Benefits Liabilities	-	-	-	-	-	-
	- Efek yg dijual dg janji dibeli kembali/Securities sold under agreement to repurchase	-	-	-	-	-	-
	Lain-lain/Others	627	114	14	-	-	499
	- Pinjaman Subordinasi/Subordinated Loans	-	-	-	-	-	-
	- Utang Pajak/Tax Debt	-	-	-	-	-	-
	- Lain-lain/Others	627	114	14	-	-	499
	Total Kewajiban/Total Liabilities	1.331.155	1.113.249	17.074	200.333	-	499
	Selisih Aset dengan Kewajiban dalam Neraca/ Difference between Assets and Liabilities in the Balance Sheet	192.523	(907.072)	83.220	(148.953)	-	1.165.327
II REKENING ADMINISTRATIF/ADMINISTRATIVE ACCOUNT							
	A. Tagihan Rekening Administratif/Administrative Account Bill						
	Komitmen/Commitment	-	-	-	-	-	-
	Kontijensi /Contingency	-	-	-	-	-	-
	Total Tagihan Rekening Administratif/Total Administrative Account Bills	-	-	-	-	-	-
	B. Kewajiban Rekening Administratif/Administrative Account Liabilities						
	Komitmen/Commitment	684	570	114	-	-	-
	Kontijensi/Contingency	-	-	-	-	-	-
	Total Kewajiban Rekening Administratif/Total Administrative Account Bills	684	570	114	-	-	-
	Selisih Tagihan dan Kewajiban dalam Rekening Administratif/Difference between Claims and Liabilities in Administrative Accounts	(684)	(570)	(114)	-	-	-
	Selisih (IA-IB) + (IIA+IIB)/Difference (IAIB)+ (IIA + IIB)	191.839	(907.642)	83.106	(148.953)	-	1.165.327
	Selisih Kumulatif/Cummulative Difference	(907.642)	(824.536)	(973.489)	(973.489)	191.839	

Pengungkapan Tagihan Bersih Berdasarkan Kategori Portofolio dan Skala Peringkat Bank
Disclosure of Net Receivables Based on the Bank Portfolio and Rating Scale Category

	Kategori Portofolio Portfolio Category	Lembaga Pemeringkat Rating Agency	Peringkat Jangka panjang Long-term Rating			
			Standard & Poor's	AAA	AA+ sd AA-	BBB+ sd BBB-
			Fitch Rating	AAA	AA+ sd AA-	BBB+ sd BBB-
			Moody's	Aaa	Aa1 sd Aa3	Baa1+ sd Baa3-
			PT Fitch Rating Indonesia	AAA (idn)	AA+(idn)sd AA-(idn)	BBB+(idn) sd BBB-(idn)
			PT ICRA Indonesia	(idr)AAA	(idr)AA+ sd (idr) AA-	(idr)BBB+ sd (idr) BBB-
			PT PEFINDO	idAAA	idAA+ sd AA-	idBBB+ sd idBBB-
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	-	-	-	-	-
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	290.488	41.163	-
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	-	-	-	-	-
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	-	-	-	-	-
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/Claims on Micro, Small and Retail Portfolio	-	-	-	-	-
9.	Tagihan Kepada Korporasi/Claims on Corporate	-	-	41.163	-	-
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	-	-	-	-	-
11.	Aset Lainnya/Other Asset	-	-	-	-	-
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-
TOTAL		-	-	331.651	41.163	-

Pengungkapan Tagihan Bersih Berdasarkan Kategori Portofolio dan Skala Peringkat Bank (Transaksi Rekening Administratif)
Disclosure of Net Receivables Based on the Bank Portfolio and Rating Scale Category (Administrative Account Transactions)

	Kategori Portofolio Portfolio Category	Lembaga Pemeringkat Rating Agency	Peringkat Jangka panjang Long-term Rating			
			Standard & Poor's	AAA	AA+ sd AA-	BBB+ sd BBB-
			Fitch Rating	AAA	AA+ sd AA-	BBB+ sd BBB-
			Moody's	Aaa	Aa1 sd Aa3	Baa1+ sd Baa3-
			PT Fitch Rating Indonesia	AAA (idn)	AA+(idn)sd AA-(idn)	BBB+(idn) sd BBB-(idn)
			PT ICRA Indonesia	(idr)AAA	(idr)AA+ sd (idr) AA-	(idr)BBB+ sd (idr) BBB-
			PT PEFINDO	idAAA	idAA+ sd AA-	idBBB+ sd idBBB-
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1.	Tagihan Kepada Pemerintah/Claims on Sovereign	-	-	-	-	-
2.	Tagihan Kepada Entitas Sektor Publik/Claims on Public Sector Entity	-	-	-	-	-
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional/Claims on Multilateral Development Banks and International Institute	-	-	-	-	-
4.	Tagihan Kepada Bank/Claims on Bank	-	-	-	-	-
5.	Kredit Beragun Rumah Tinggal/Secured by Residential Property	-	-	-	-	-
6.	Kredit Beragun Properti Komersial/Secured by Commercial Real Estate	-	-	-	-	-
7.	Kredit Pegawai/Pensiunan/Pensioners/employees loans	-	-	-	-	-
8.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel/Claims on Micro, Small and Retail Portfolio	-	-	-	-	-
9.	Tagihan Kepada Korporasi/Claims on Corporate	-	-	-	-	-
10.	Tagihan Yang Telah Jatuh Tempo/Past due claims	-	-	-	-	-
11.	Aset Lainnya/Other Asset	-	-	-	-	-
12.	Eksposur di Unit Syariah/Exposure in Sharia Unit	-	-	-	-	-
TOTAL		-	-	-	-	-

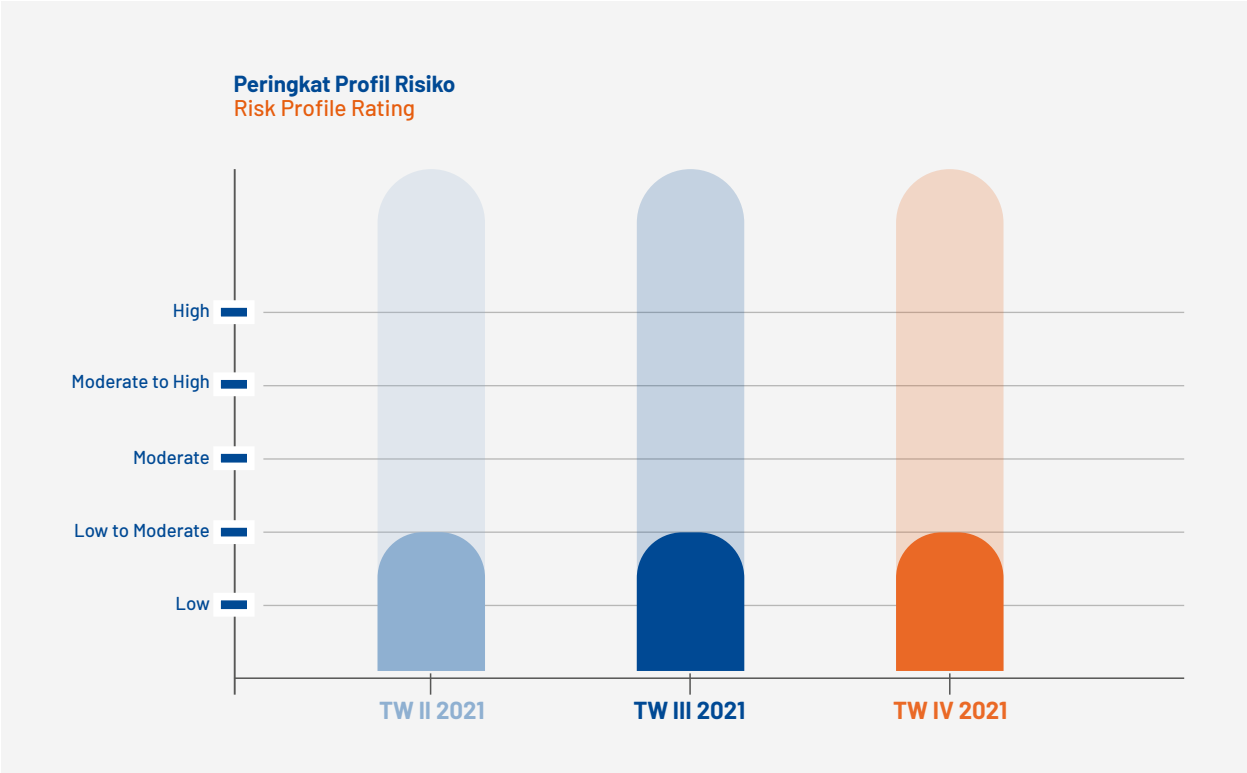


(dalam jutaan rupiah/in million rupiah)

31 Desember 2021/ December 31, 2021									
Tagihan Bersih				Peringkat Jangka Pendek Short Term Rating				Total Tanpa Peringkat No Rating	Total
	BB+ sd BB-	B+ sd B-	Kurang dari B-/ Less than B-	A-1	A-2	A-3	Kurang dari A-3 / Less than A-3		
	BB+ sd BB-	B+ sd B-	Kurang dari B-/ Less than B-	F1+ sd F1	F2	F3	Kurang dari F3/ Less than F3		
	Ba1+ sd Ba3-	B1+ sd B3-	Kurang dari B3/ Less than B3	P-1	P-2	P-3	Kurang dari P-3/ Less than P-3		
	BB+(idn) sd BB-(idn)	B+(idn) sd B-(idn)	Kurang dari B-(idn)/ Less than B-(idn)	F1+(idn) sd F1 (idn)	F2+(idn)	F3+(idn)	Kurang dari F3 (idn)/ Less than F3 (idn)		
	(idr)BB+ sd (idr) BB-	(idr)B+ sd (idr) B-	Kurang dari idr B-/ Less than idr B-	(idr)A1+ sd (idr) A1	(idr)A2+ sd (idr) A2	(idr)A3+ sd (idr) A3	Kurang dari A3 (idr)/ Less than A3 (idr)		
	idBB+ sd idBB-	idB+ sd idB-	Kurang dari idB/ Less than idB	idA1	idA2	idA3 sd idA4	Kurang dari id A4/ Less than idd A4		
(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
-	-	-	-	-	-	-	-	4.588.031	4.588.031
-	-	-	-	-	-	-	-	1.407.406	1.407.406
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	115.664	447.315
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	7.040.796	7.081.959
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	13.151.897	13.524.711

(dalam jutaan rupiah/in million rupiah)

31 Desember 2021/ December 31, 2021									
Tagihan Bersih				Peringkat Jangka Pendek Short Term Rating				Total Tanpa Peringkat No Rating	Total
	BB+ sd BB-	B+ sd B-	Kurang dari B-/ Less than B-	A-1	A-2	A-3	Kurang dari A3/ Less than A-3		
	BB+ sd BB-	B+ sd B-	Kurang dari B-/ Less than B-	F1+ sd F1	F2	F3	Kurang dari F3/ Less than F3		
	Ba1+ sd Ba3-	B1+ sd B3-	Kurang dari B3/ Less than B3	P-1	P-2	P-3	Kurang dari P-3/ Less than P-3		
	BB+(idn) sd BB-(idn)	B+(idn) sd B-(idn)	Kurang dari B-(idn)/ Less than B-(idn)	F1+(idn) sd F1 (idn)	F2+(idn)	F3+(idn)	Kurang dari F3 (idn)/ Less than F3 (idn)		
	(idr)BB+ sd (idr) BB-	(idr)B+ sd (idr) B-	Kurang dari (idr) B-/ Less than (idr) B-	(idr)A1+ sd (idr) A1	(idr)A2+ sd (idr) A2	(idr)A3+ sd (idr) A3	Kurang dari A3 (idr)/ Less than A3 (idr)		
	idBB+ sd idBB-	idB+ sd idB-	Kurang dari idB- Less than idB-	idA1	idA2	idA3 sd idA4	Kurang dari idA4/ Less than idA4		
(7)	(8)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	970	970
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	122.152	122.152
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	123.122	123.122





/ BAB 6

LAPORAN KEBERLANJUTAN SUSTAINABILITY REPORT





Tentang Laporan

About Report

Selamat datang di Laporan Keberlanjutan PT Bank Raya Indonesia Tbk. Laporan Keberlanjutan ini merupakan laporan kedua yang diterbitkan Bank. Penerbitan perdana adalah laporan untuk tahun buku 2020 yang dibuat dalam satu kesatuan dengan Laporan Tahunan yang terbit pada tanggal 18 Maret 2021. Sesuai peraturan perundang-undangan yang berlaku di Indonesia dan sebagai perusahaan publik serta dalam rangka mewujudkan prinsip keterbukaan kepada seluruh pemangku kepentingan, PT Bank Raya Indonesia Tbk menerbitkan laporan secara berkala setiap tahun, baik dalam bentuk Laporan Tahunan dan Laporan Keberlanjutan yang dibuat secara terpisah, maupun dalam satu kesatuan. [GRI 102-51, GRI 102-52]

We would like to extend a warm welcome to the PT Bank Raya Indonesia Tbk Sustainability Report. This is the Bank's second sustainability report. The first publication is a report for the fiscal year 2020, which is combined with the Annual Report, which is scheduled to be released on March 18, 2021. In accordance with applicable laws and regulations in Indonesia, and as a public company, and in order to uphold the principle of transparency toward all stakeholders, PT Bank Raya Indonesia Tbk publishes periodic reports each year, either separately or in a single unit, in the form of Annual Reports and Sustainability Reports. [GRI 102-51, GRI 102-52]

Pedoman dan Prinsip Pelaporan

Guidelines and Principles for Reporting

Penyusunan laporan ini merujuk pada Peraturan OJK No. 51/POJK.03/2017, dan dikombinasikan dengan standar global, yaitu Standar GRI (*GRI Standards*) yang dikeluarkan oleh *Global Sustainability Standards Board* (GSBB), lembaga yang dibentuk oleh *Global Reporting Initiative* (GRI) untuk menangani pengembangan standar laporan keberlanjutan. Sesuai dengan pilihan yang disediakan dalam Standar GRI, yakni Pilihan Inti dan Pilihan Komprehensif, laporan ini telah disiapkan sesuai dengan Standar GRI: Pilihan Inti (*Core*). [GRI 102-54]

This report was prepared in accordance with OJK Regulation No. 51/POJK.03/2017 and global standards, specifically the GRI Standards (GRI Standards) issued by the Global Sustainability Standards Board (GSBB), an organisation established by the Global Reporting Initiative (GRI) to oversee the development of sustainability reporting standards. In accordance with the options provided in the GRI Standards, namely Core Option and Comprehensive Option; thus, this report has been prepared in accordance with the GRI Standards: Core Options. [GRI 102-54]

Bank Raya berupaya untuk menyampaikan semua informasi yang diminta ketentuan di atas. Untuk memudahkan pembaca menemukan informasi yang sesuai dengan rujukan, Bank menyertakan penanda khusus berupa angka dan huruf sesuai isi Laporan Keberlanjutan sebagaimana diatur dalam Lampiran II POJK No. 51/2017, atau pencantuman angka pengungkapan Standar GRI di belakang kalimat atau alinea yang relevan. Data lengkap kecocokan isi laporan dengan kedua rujukan disajikan di bagian belakang laporan ini, dimulai pada halaman [GRI 102-55]

Bank Raya makes every effort to provide the information required by the aforementioned laws. To assist readers in locating information that corresponds to the reference, the Bank incorporates special markers in the form of numbers and letters consistent with the contents of the Sustainability Report as specified in Attachment II of POJK No. 51/2017, or by including the GRI Standard disclosure number behind the relevant sentence or paragraph. Complete statistics on the adequacy of the report's contents, as well as two references, are included in the report's appendix, beginning on page.... [GRI 102-55]

Melalui Laporan ini, Bank berharap para pemangku kepentingan dapat mengetahui komitmen dan kontribusi Bank Raya dalam upaya pencapaian Tujuan Pembangunan Berkelanjutan (*Sustainable Development Goals/SDGs*). Untuk itu, Bank juga menyampaikan tautan materialitas laporan ini dengan SDGs, sesuai dengan *SDG Compass, The Guide for Business Action on the SDGs*, yang disusun oleh GRI, *United Nations Global Compact*, dan *the World Business Council for Sustainable Development* (WBCSD), yang bisa ditemukan pada halaman

The Bank expects that stakeholders would learn about Bank Raya's commitment to and contribution to attaining the Sustainable Development Goals (SDGs) via this report. To that end, the Bank also conveys the report's materiality in relation to the SDGs, in accordance with the *SDG Compass, The Guide for Business Action on the SDGs*, which was compiled by GRI, the United Nations Global Compact, and the World Business Council for Sustainable Development (WBCSD) and is available on page.....

Periode Pelaporan [GRI 102-50] Reporting Period [GRI 102-50]

Laporan Keberlanjutan PT Bank Raya Indonesia Tbk 2021 memuat kinerja keuangan, kinerja operasional dan kinerja keberlanjutan Bank pada periode pelaporan 1 Januari sampai 31 Desember 2021.

The 2021 Sustainability Report of PT Bank Raya Indonesia Tbk summarises the Bank's financial performance, operational performance, and sustainability performance over the reporting period of January 1 to December 31, 2021.

Kredibilitas Laporan [GRI 102-56] Report Credibility [GRI 102-56]

GRI merekomendasikan penggunaan *external assurance* oleh pihak ketiga yang independen untuk memastikan kualitas dan kehandalan informasi yang disampaikan dalam laporan ini. Namun, hal itu bukanlah persyaratan agar dapat "sesuai" dengan Pedoman.

GRI advises that this report be subjected to external assurance by an independent third party to confirm the data's quality and reliability. However, compliance with the Code is not a necessity.

Laporan Keberlanjutan 2021 ini masih belum diverifikasi melalui proses penjaminan (*assurance*) oleh pihak *independent*, namun telah menjalani proses verifikasi internal. [GRI 102-48, GRI 102-56]

This 2021 Sustainability Report has not yet been independently validated; however, it has through an internal verification procedure. [GRI 102-48, GRI 102-56]

Perubahan Dalam Pelaporan dan Penyajian Kembali Informasi Modifications to the Reporting and Restating of Information

Dalam Laporan Keberlanjutan tahun 2021, tidak ada pernyataan ulang yang bersifat memperbaiki laporan sebelumnya. Namun demikian, pada Laporan Keberlanjutan tahun 2021 ini terdapat terdapat perubahan dalam daftar Topik Material dan Batasan Topik. [GRI 102-49]

There is no restatement in the 2021 Sustainability Report that is intended to improve on the prior report. However, there are revisions to the list of Material Topics and Topic Boundaries in this 2021 Sustainability Report. [GRI 102-49]

Cakupan dan Batasan Laporan Report Scope and Boundaries

Laporan ini hanya mengungkap kegiatan tanggung jawab sosial dan lingkungan yang dilakukan Bank Raya meliputi kantor pusat dan seluruh jaringan kantor. Hingga 31 Desember 2021, Bank Raya tidak memiliki anak perusahaan. Informasi dan data kinerja keberlanjutan yang disajikan dalam laporan ini mencakup kinerja keuangan konsolidasi seluruh unit kerja cabang dan capem serta data kinerja sosial dan lingkungan yang dilaporkan secara menyeluruh dan berimbang.

This report focuses only on Bank Raya's social and environmental stewardship efforts at the head office and across the company's branch network. Bank Raya does not have any subsidiaries as of December 31, 2021. The report's sustainability performance statistics and data include the consolidated financial performance of all branch and sub-district work units, as well as complete and balanced social and environmental performance data.

Data keuangan dalam Laporan ini menggunakan nominasi Rupiah, kecuali diindikasikan lain. Data keuangan yang kami sampaikan sudah diaudit oleh Kantor Akuntan Publik Purwantono, Sungkoro & Surja. Laporan dibuat dalam dua bahasa, yakni Bahasa Indonesia dan Bahasa Inggris. Data kuantitatif dalam Laporan ini disajikan dengan menggunakan prinsip daya banding (*comparability*), minimal dalam dua tahun berturut-

Unless otherwise specified, all financial statistics in this Report are expressed in Rupiah. The financial data that we present has been audited by the public accounting firm Purwantono, Sungkoro & Surja. Reports are written in both Indonesian and English. Quantitative data in this study are given for at least two consecutive years applying the premise of comparability. As a result, consumers

turut. Dengan demikian, pengguna Laporan dapat melakukan analisis tren kinerja Bank. Selain menyajikan data, laporan keberlanjutan Bank tahun 2020 juga melaporkan semua isu yang menjadi material terkait operasional Bank mencakup pula beberapa penjelasan kegiatan usaha. [GRI 102-45]

Menentukan Isi Laporan [GRI 102-46] Determining Report's Content [GRI 102-46]

Bank Raya berkomitmen untuk menjalankan bisnis yang memperhatikan aspek-aspek ekonomi, sosial, dan lingkungan serta menyeimbangkannya dengan kepentingan para pemangku kepentingan, melalui proses dan pendekatan-pendekatan khusus.

Perusahaan lebih mengerti dan memahami apa yang menjadi perhatian dan ekspektasi para pemangku kepentingan terhadap Bank.

Penyusunan laporan dan penjabaran isu-isu material relevan yang menjadi perhatian para pemangku kepentingan, serta menjadi perhatian Perusahaan yang telah melalui beberapa tahap yaitu:

1. Identifikasi
Bank memulai proses penyusunan laporan ini dengan mengidentifikasi aspek dan topik yang material dari segi ekonomi, sosial, dan lingkungan bagi Perusahaan termasuk hambatan-hambatan yang dihadapi. Proses mengacu pada prinsip-prinsip konteks berkelanjutan dan keterlibatan para pemangku kepentingan. Penentuan aspek atau isu yang material berdasarkan tingkat pengaruh atau dampaknya terhadap produk, jasa, dan kegiatan bisnis Bank.
2. Prioritas
Perusahaan membuat skala prioritas terhadap aspek yang telah diidentifikasi untuk menentukan aspek yang paling material atau penting bagi Bank.
3. Validasi
Proses ini melibatkan para pemangku kepentingan melalui *stakeholder engagement* untuk memvalidasi aspek-aspek yang telah teridentifikasi dan menjadi prioritas dan *concern* para pemangku kepentingan. Dalam tahap ini, Bank sudah dapat memberikan gambaran matrik aspek material yang menjadi dasar utama penentuan topik-topik dalam laporan ini.
4. Review
Bank Raya selanjutnya melakukan *review* dan evaluasi atas Laporan Keberlanjutan yang telah disusun dan diterbitkan, untuk melakukan perbaikan dalam menyusun laporan keberlanjutan periode selanjutnya.

Selanjutnya, prinsip penetapan konten laporan ini didasarkan pada 4 (empat) prinsip, sesuai dengan panduan GRI, yaitu:

of the Report may do trend analysis on the Bank's performance. Along with statistics, the Bank's 2020 sustainability report discusses all major aspects of its operations, including many reasons for business activity. [GRI 102-45]

Bank Raya is devoted to doing business in a manner that takes economic, social, and environmental considerations into account and balances them against the interests of stakeholders, using unique procedures and methodologies.

The Company has a greater understanding and appreciation of stakeholders' concerns and expectations about the Bank.

Preparation of reports and elaboration of material concerns of importance to stakeholders, as well as the Company, which has progressed through numerous phases, namely:

1. Identification
The Bank commenced the process of creating this report by identifying features and themes that are significant for the Company from an economic, social, and environmental standpoint, as well as the barriers encountered. The methodology is guided by sustainable context and stakeholder engagement principles. Material features or difficulties are identified based on their degree of influence or effect on the Bank's goods, services, and business operations.
2. Priority
The Company establishes a priority scale for the identified factors in order to ascertain which are the most relevant or significant to the Bank.
3. Validation
This method incorporates stakeholders in order to verify the issues that have been discovered and have become the stakeholders' priorities and concerns. At this point, the Bank has been able to offer an overview of the material aspect matrix that serves as the primary foundation for the report's subjects.
4. Review
Bank Raya then examines and assesses the completed and published Sustainability Report in order to make changes in the following period's preparation.

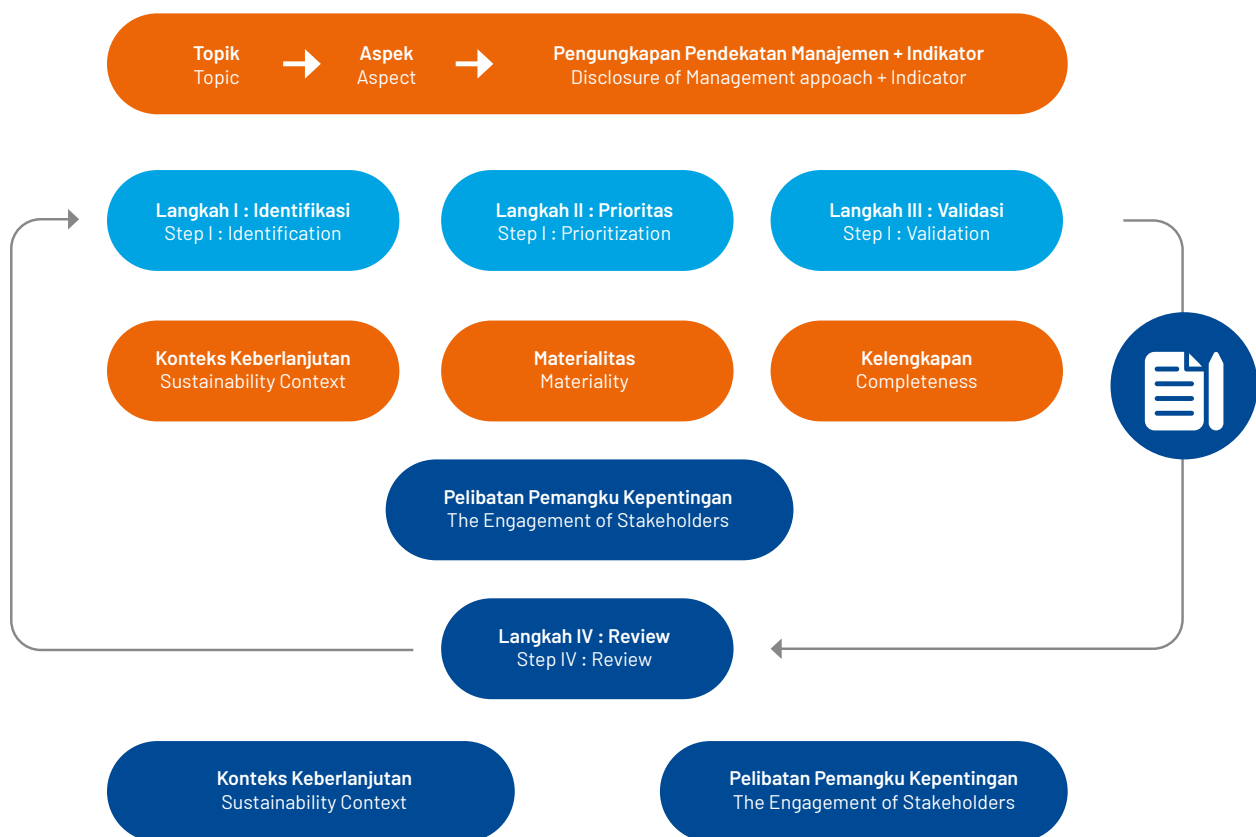
Additionally, the content of this report is determined by four (four) principles, in accordance with the GRI rules, namely:

1. *Stakeholders inclusiveness* (pelibatan pemangku kepentingan), yaitu melibatkan pemangku kepentingan dalam penentuan topik material yang diungkapkan dalam laporan ini.
2. *Materiality* (materialitas), diterapkan dalam laporan ini dengan memilih konten laporan yang bersifat material/penting, yang diperlukan oleh pemangku kepentingan.
3. *Sustainability context* (konteks keberlanjutan) yang merupakan topik-topik yang terkait dengan konteks keberlanjutan, yang relevan bagi pembuat laporan dalam membuat keputusan, dan
4. *Completeness* (lengkap), yaitu laporan ini dibuat dengan ruang lingkup yang jelas untuk periode laporan 2021 serta didukung dengan data yang lengkap.

Keempat langkah dalam menetapkan konten laporan digambarkan dalam Bagan Alur Proses Penetapan Konten Laporan berikut ini.

1. *Stakeholders Inclusiveness*: involving stakeholders in establishing the report's content themes;
2. *Materiality*: it is being exerted in this report to refer to the selection of report content that is material/important and requested by stakeholders;
3. *Sustainability context*: referring to issues relating to sustainability that are important for report writers to consider when making judgments; and
4. *Completeness*, in that this report is written with a defined scope for the reporting period ending in 2021 and is backed up by comprehensive data.

The following Report Content Defined Process Flowchart illustrates the four processes involved in establishing report content.



Sementara itu, konten laporan diulas demi memenuhi 6 (enam) prinsip kualitas yang direkomendasikan oleh GRI, meliputi:

1. Akurasi Informasi yang disajikan harus akurat dan detail sehingga dapat digunakan oleh para pemangku kepentingan untuk menilai kinerja perusahaan.
2. Keseimbangan Kinerja perusahaan yang disajikan harus memuat aspek positif maupun negatif sehingga dapat dinilai secara rasional dan menyeluruh.
3. Kejelasan Informasi yang disajikan harus mudah dipahami dan terbuka bagi para pemangku kepentingan untuk diakses.
4. Daya Banding Informasi yang disajikan harus konsisten dan dapat digunakan oleh pemangku kepentingan untuk menilai perubahan kinerja yang terjadi pada perusahaan dalam jangka waktu tertentu, dapat dengan menyertakan data dan informasi untuk beberapa tahun sebelum periode pelaporan yang digunakan.
5. Keandalan Laporan harus memuat dan menggunakan informasi serta proses yang digunakan dalam menyiapkan laporan, yang dapat diperiksa dan mencerminkan kualitas dan materialitas dari informasi yang disajikan.
6. Ketepatan Waktu Laporan harus diterbitkan secara rutin sehingga pemangku kepentingan dapat mengambil keputusan secara tepat waktu berdasarkan informasi yang tersedia.

Meanwhile, the report's content is assessed to ensure that it adheres to GRI's six (six) quality principles, which include the following:

1. Accuracy: the data must be precise and complete in order for stakeholders to evaluate the company's success.
2. Balance: the performance of the business must include both good and negative factors in order to be evaluated sensibly and comprehensively.
3. Clarity: the information supplied must be simple to comprehend and accessible to all parties.
4. Reliability: the information supplied must be consistent and allow stakeholders to evaluate changes in the company's performance over a specified time period by supplying statistics and information for many years previous to the reporting period utilised.
5. Comparability: the report is necessarily required to include and use information and methods for report preparation that are auditable and accurately represent the quality and relevance of the information given.
6. Timeliness: the Report needs publishing regularly; thus, stakeholders can make timely decisions based on available information.

Proses Penentuan Materialitas dan Obyek Pelaporan Materiality Determination Process and Reporting Object

Dalam menyusun laporan ini, Bank Raya telah melakukan pemilihan aspek material berdasarkan proses yang dijelaskan di atas. Bank melakukan diskusi awal untuk menentukan aspek yang dipertimbangkan untuk diungkapkan, dilanjutkan dengan menyebarkan kuesioner kepada berbagai pemangku kepentingan. Bank Raya mendefinisikan pemangku kepentingan sebagai entitas atau individu yang terpengaruh oleh kegiatan, produk, dan jasa perusahaan. Di sisi lain, keberadaan mereka juga mempengaruhi perusahaan dalam mewujudkan keberhasilan penerapan strategi dan pencapaian tujuan. [GRI 102-42]

Pelibatan pemangku kepentingan diarahkan pada kepentingan usaha Bank dengan memperhatikan tanggung jawab sosial, kepedulian terhadap masalah-masalah lingkungan, serta memperhatikan skala prioritas dalam membangun komunikasi dengan berbagai mitra strategis.

Untuk menggali dan memenuhi minat, harapan serta kepentingan para pemangku kepentingan, Bank Raya secara rutin melaksanakan serangkaian program dan kegiatan dengan melibatkan pemangku kepentingan. Dengan upaya itu, maka Bank dapat menempatkan posisinya secara tepat di antara pemangku kepentingan yang sangat beragam demi tercapainya keberlangsungan bisnis Bank sebagai lembaga keuangan maupun keberlanjutan ekonomi, masyarakat, dan lingkungan sekitar. [GRI 102-43]

Bank Raya chose material components for this report based on the approach outlined above. The Bank has preliminary conversations to ascertain the information that should be disclosed, and then distributes questionnaires to relevant stakeholders. Bank Raya defines stakeholders as organisations or persons whose actions, goods, or services are impacted by the enterprise. On the other side, their presence also has an impact on the company's ability to successfully execute plans and accomplish objectives. [GRI 102-42]

Stakeholder engagement is focused on the Bank's commercial objectives by emphasising social responsibility, environmental stewardship, and adhering to a priority scale when communicating with different strategic partners.

Bank Raya conducts a number of programmes and activities engaging stakeholders on a regular basis to investigate and meet their interests, aspirations, and interests. Through these efforts, the Bank can establish a suitable position among varied stakeholders in order to ensure the Bank's commercial sustainability as a financial institution, as well as the economy's, society's, and surrounding environment's sustainability. [GRI 102-43]

Dalam mengidentifikasi topik-topik material tersebut, Bank telah melaksanakan *Focus Group Discussion* (FGD). FGD dilaksanakan dengan tujuan melakukan identifikasi terhadap topik-topik yang material/signifikan dan menetapkan batasan (*boundary*). FGD dilanjutkan dengan melakukan validasi dan evaluasi atas Laporan keberlanjutan tahun sebelumnya.

Karena adanya pandemi Covid-19, FGD dilakukan melalui media daring (*online*) dengan menggunakan aplikasi Zoom dan dihadiri oleh pemangku kepentingan Bank. Berdasarkan FGD Bank melakukan uji materialitas atas keseluruhan topik yang ada dalam GRI versi 2020. Terdapat 33 (tiga puluh tiga) topik yang diuji. Uji materialitas dilakukan dengan menggunakan survei kepada pemangku kepentingan internal maupun eksternal. Selain menjadi salah satu bentuk dan upaya pelibatan pemangku kepentingan, uji materialitas dilakukan untuk mengetahui peringkat materialitas topik material terpilih.

Dalam *survey* tersebut, responden diminta mengisi dan menilai 33 (tiga puluh tiga) topik material yang telah disepakati dalam FGD dengan skala 1-5 berdasarkan tingkat kepentingannya:

1. Sangat Tidak Penting
2. Tidak Penting
3. Tidak tahu
4. Penting
5. Sangat Penting

Ke-33 topik material tersebut adalah sebagai berikut:

1. Kinerja ekonomi
2. Keberadaan Pasar
3. Dampak ekonomi tidak langsung
4. Praktik pengadaan
5. Anti-korupsi
6. Perilaku anti-persaingan
7. Material
8. Energi
9. Air dan air limbah
10. Keanekaragaman hayati
11. Emisi
12. Limbah
13. Kepatuhan lingkungan
14. Penilaian lingkungan pemasok
15. Kependidikan
16. Hubungan ketenagakerjaan
17. Kesehatan dan keselamatan kerja (K3)
18. Pelatihan dan pendidikan
19. Keanekaragaman dan kesempatan setara
20. Non-diskriminasi
21. Kebebasan berserikat dan perundingan kolektif
22. Pekerja anak
23. Kerja paksa
24. Praktik Keamanan

The Bank conducted a Focus Group Discussion to identify these critical issues (FGD). The purpose of the FGDs was to identify material/significant issues and to establish limits. The FGD was then extended to include the validation and evaluation of the previous year's sustainability report.

Due to the Covid-19 epidemic, the FGD was held through online media using the Zoom application, with Bank stakeholders in attendance. The Bank performed a materiality test on all subjects in the 2020 edition of GRI based on the FGD. Thirty-three (33) different themes were examined. A survey of internal and external stakeholders is used to determine the materiality of an issue. Along with being a method and effort for stakeholders to get involved, a materiality test is conducted to ascertain the materiality rating of the specified material subjects.

Respondents were invited to complete a survey and assess 33 (thirty-three) material issues agreed upon during the FGD on a scale of 1-5 depending on their importance:

1. Extremely Insignificant
2. Insignificant
3. Unknown
4. Significant
5. Extremely Significant

The 33 material topics are as follows:

1. Economic performance
2. Market Existence
3. Indirect economic impact
4. Procurement practice
5. Anti-corruption
6. Anti-competitive behavior
7. Material
8. Energy
9. Water and waste water
10. Biodiversity
11. Emission
12. Waste
13. Environmental compliance
14. Supplier environmental assessment
15. Staffing
16. Labor relations
17. Occupational health and safety (K3)
18. Training and education
19. Diversity and equal opportunity
20. Non-discrimination
21. Freedom of association and collective bargaining
22. Child labor
23. Forced labor
24. Safety Practices

25. Hak dari masyarakat adat
26. Penilaian hak asasi manusia
27. Masyarakat lokal
28. Penilaian sosial terhadap pemasok
29. Kebijakan Publik
30. Kesehatan dan keselamatan pelanggan
31. Pemasaran dan pelabelan
32. Privasi pelanggan
33. Kepatuhan sosial ekonomi

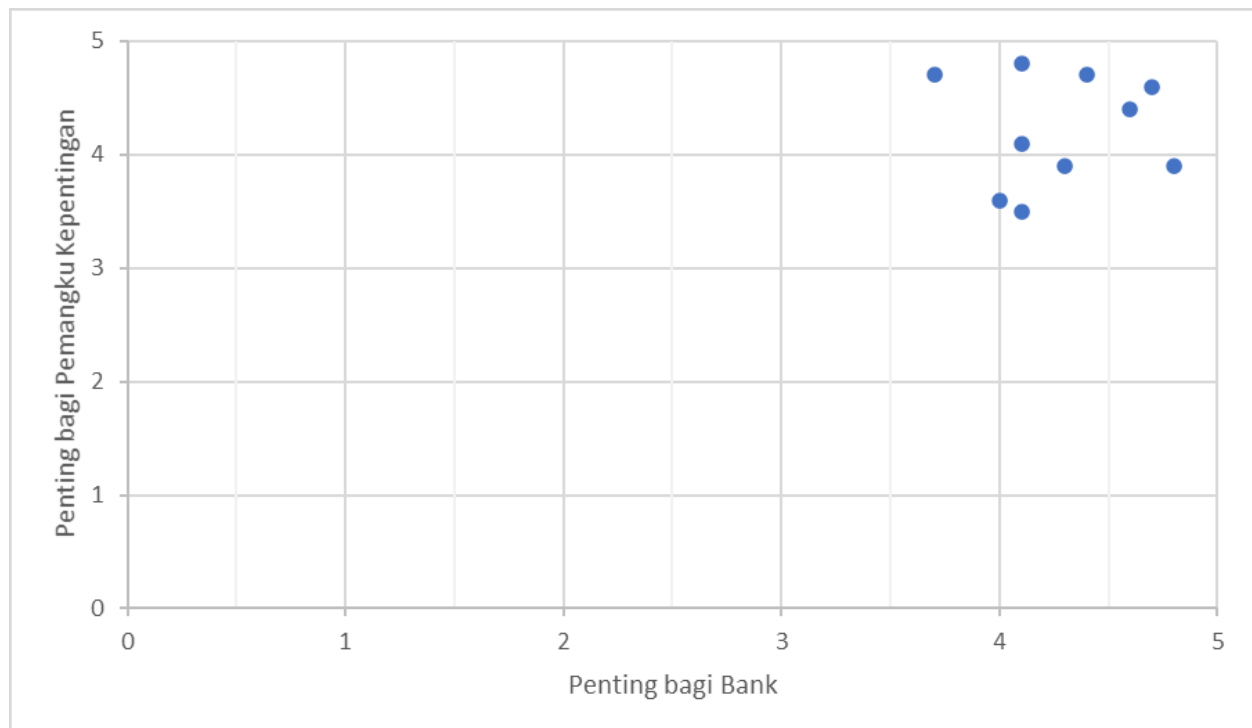
25. Rights of indigenous peoples
26. Human rights assessment
27. Local people
28. Social assessment of suppliers
29. Public Policy
30. Customer health and safety
31. Marketing and labeling
32. Customer privacy
33. Socio-economic compliance

Berdasarkan hasil uji materialitas dan validasi dari hasil survei serta hasil evaluasi manajemen dari Laporan keberlanjutan tahun sebelumnya, diperoleh 10 (sepuluh) topik material sebagai berikut: [\[GRI 102-49\]](#)

1. Kinerja Ekonomi
2. Keberadaan pasar
3. Dampak ekonomi tidak langsung
4. Anti korupsi
5. Material
6. Energi
7. Kpegawaian
8. Pelatihan dan pendidikan
9. Kepatuhan
10. Privasi pelanggan

The following ten (ten) material issues were identified based on the findings of the materiality test and validation of the survey and management assessment results from the previous year's sustainability report: [\[GRI 102-49\]](#)

1. Economic Performance
2. Market presence
3. Indirect economic impact
4. Anti-corruption
5. Material
6. Energy
7. Staffing
8. Training and education
9. Compliance
10. Customer privacy



Daftar Topik Material dan Batasannya

List of Material Topics and the Boundaries

Topik Material Material Topic [GRI - 102-47]	Kenapa Topik Ini Material Why the Topic is Material [GRI - 103-1]	No Pengungkapan Number of Disclosures	Boundary (Batasan dampak) [GRI - 102-46]	
			Di Dalam Bank Raya Inside Bank Raya	Di Luar Bank Raya Outside Bank Raya
Topik Ekonomi Economics Topic				
Kinerja Ekonomi Economic Performance	Menggambarkan pencapaian dan kinerja Bank selama tahun pelaporan Elucidating the Bank's accomplishments and performance throughout the fiscal year under review.	GRI 201-1, GRI 201-3	√	√
Keberadaan Pasar Market Presence	Menggambarkan komitmen Bank terhadap hak normatif dalam pengupahan Describing the Bank's adherence to wage norms.	GRI 202-1	√	√
Dampak Ekonomi Tidak Langsung Indirect Economic Impact	Menggambarkan manfaat atas keberadaan Bank bagi masyarakat di sekitarnya Explicitly stating the advantages of the Bank's presence to the surrounding community	GRI 203-1, GRI 203-2	√	√
Anti Korupsi Anti Corruption	Menggambarkan kepatuhan Bank terhadap peraturan perundangan-undangan yang berlaku Indicating the extent to which the Bank complies with relevant rules and regulations.	GRI 205-3	√	
Topik Lingkungan Environmental Topic				
Material Material	Menggambarkan komitmen Bank dalam mengelola penggunaan material (kertas), termasuk langkah-langkah penghematan yang dilakukan Describing the Bank's commitment to reducing its material consumption (paper), including the cost-cutting strategies implemented	GRI 301-1	√	
Energi Energy	Menggambarkan kepedulian Bank terhadap pengelolaan energi tak terbarukan yang ketersediaannya kian terbatas Demosntrating the Bank's concern for the management of non-renewable energy sources whose supply is becoming more scarce.	GRI 302-1, GRI 302- 4	√	√
Topik Sosial Social Topic				

Topik Material Material Topic [GRI - 102-47]	Kenapa Topik Ini Material Why the Topic is Material [GRI - 103-1]	No Pengungkapan Number of Disclosures	Boundary (Batasan dampak) [GRI - 102-46]	
			Di Dalam Bank Raya Inside Bank Raya	Di Luar Bank Raya Outside Bank Raya
Kepegawaian Staffing	Menggambarkan komitmen Bank tentang pentingnya pengelolaan pegawai/SDM Describing the Bank's commitment to the critical nature of human resource management.	GRI 401-1, GRI 401-2, GRI 401-3	√	
Pelatihan dan Pendidikan Training and Education	Menggambarkan komitmen Bank dalam upaya meningkatkan kompetensi pekerja Demonstrating the Bank's commitment to employee development	GRI 404-2, GRI 404-3	√	
Kepatuhan Sosial Ekonomi Socio-Economic Compliance	Menggambarkan komitmen Bank dalam mentaati peraturan tentang sosial-ekonomi, seperti ketenagakerjaan, bersaing sehat, dan non-diskriminasi Demonstrating the Bank's adherence to social and economic rules such as employment, fair competition, and nondiscrimination	GRI 419-1	√	√
Privasi Pelanggan Customer's Satisfaction	Menggambarkan komitmen Bank dalam menjaga kerahasiaan data pelanggan Illustrating the Bank's commitment to safeguarding customer data confidentially.	GRI 418-1	√	√

Aksesibilitas dan Umpan Balik Accessibility and Consultation

Untuk terwujudnya komunikasi dua arah dan agar Bank dapat melakukan evaluasi dalam rangka meningkatkan kualitas Laporan di masa mendatang, Bank menyediakan Lembaran Umpan Balik di bagian akhir laporan ini. Dengan lembaran tersebut, diharapkan pembaca dan pengguna laporan ini dapat memberikan usulan, umpan balik, opini dan sebagainya, yang sangat berguna bagi peningkatan kualitas pelaporan di masa depan. Bank memberikan akses informasi seluas-luasnya bagi seluruh pemangku kepentingan, dan investor serta siapa saja mengenai laporan keberlanjutan ini dengan menghubungi: [GRI 102-53]

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The Bank includes a Feedback Sheet at the conclusion of this report to facilitate two-way contact and to allow the Bank to conduct assessments in order to enhance the quality of future reports. With this sheet, it is intended that readers and users of this report will be able to give recommendations, comments, and views, which will be very beneficial in the future for enhancing the quality of reporting. The Bank gives the broadest possible access to information about this sustainability report to all stakeholders, investors, and anyone else by contacting: [GRI 102-53]

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Pelibatan Pemangku Kepentingan [GRI 102-40; GRI 102-42; GRI 102-43][E.3]

Stakeholder Engagement [GRI 102-40; GRI 102-42; GRI 102-43][E.3]

Pemangku kepentingan bukan hanya anggota masyarakat atau organisasi non-pemerintah. Mereka adalah individu, kelompok individu, atau organisasi yang memengaruhi dan/atau dapat dipengaruhi oleh aktivitas, produk atau layanan organisasi, dan/atau kinerja terkait dengan masalah yang akan ditangani oleh keterlibatan pemangku kepentingan. Keterlibatan pemangku kepentingan adalah proses yang digunakan oleh organisasi untuk melibatkan pemangku kepentingan yang relevan untuk tujuan yang jelas untuk mencapai hasil yang disepakati.

Keterlibatan pemangku kepentingan juga diakui sebagai mekanisme akuntabilitas mendasar karena mewajibkan organisasi untuk melibatkan pemangku kepentingan dalam mengidentifikasi, memahami, dan menanggapi masalah dan perhatian keberlanjutan, dan untuk melaporkan, menjelaskan, dan menjawab kepada pemangku kepentingan atas keputusan, tindakan, dan kinerja.

Bank Raya menyadari pentingnya pelibatan pemangku kepentingan dalam menjalankan bisnis Bank. Seiring dengan komitmen Bank untuk menjadi Bank yang berkelanjutan, Bank selalu berupaya melakukan pelibatan pemangku kepentingan. Selain itu Bank selalu berusaha untuk melakukan pelibatan kepentingan yang berkualitas. Bank yakin bahwa para pemangku kepentingan dapat mengarah pada pembangunan sosial yang lebih adil dan berkelanjutan dengan memberikan mereka yang memiliki hak untuk didengar dan kesempatan untuk dipertimbangkan dalam proses pengambilan keputusan, membantu untuk menentukan masalah material untuk pengelolaan dan pelaporan keberlanjutan, memungkinkan lebih baik manajemen risiko dan reputasi, memungkinkan pengumpulan sumber daya (pengetahuan, orang, uang dan teknologi) untuk memecahkan masalah dan mencapai tujuan yang tidak dapat dicapai oleh Bank, memungkinkan pemahaman tentang lingkungan operasi yang kompleks, termasuk perkembangan pasar dan dinamika budaya.

Bank Raya menerapkan beberapa prinsip dalam proses pelibatan pemangku kepentingan. Prinsip-prinsip tersebut sejalan dengan prinsip yang dikembangkan oleh AA1000 *Stakeholder Engagement Standard* (AA1000SES) 2015 dan ISO 26000.

- **Inklusivitas**
Inklusivitas adalah partisipasi para pemangku kepentingan dalam mengembangkan dan mencapai respons yang akuntabel dan strategis terhadap keberlanjutan. Bank Raya menerima pertanggungjawabannya kepada mereka yang terkena dampak dan yang terkena dampaknya.
- **Materialitas**
Materialitas menentukan relevansi dan signifikansi suatu masalah bagi Bank dan pemangku kepentingannya. Masalah material adalah masalah yang akan mempengaruhi keputusan, tindakan dan kinerja Bank atau pemangku kepentingannya.

Stakeholders are not limited to members of the public or nonprofit sector. They are persons, groups of individuals, or organisations that have the ability to influence and/or be impacted by an organisation's actions, goods or services, and/or associated performance in regard to the problems addressed via stakeholder engagement. Stakeholder engagement is a process through which companies engage relevant stakeholders in order to accomplish a certain goal.

Stakeholder engagement is also recognised as a critical accountability mechanism because it requires organisations to engage stakeholders in identifying, comprehending, and responding to sustainability issues and concerns, as well as to report, explain, and respond to stakeholders on their decisions, actions, and performance.

Bank Raya understands the critical nature of stakeholder participation in the Bank's operations. In keeping with the Bank's objective to being a sustainable institution, the Bank is constantly pursuing stakeholder engagement. Additionally, the Bank is always pursuing high-quality interest engagements. The Bank believes that stakeholders can contribute to more equitable and sustainable social development by providing those with the right to be heard and the opportunity to be considered in decision-making, by assisting in the definition of material issues for sustainability management and reporting, by enabling better risk management and reputation, and by enabling the pooling of resources (knowledge, people, money, and technology) to solve problems and accomplish goals that the Bank cannot.

Bank Raya's stakeholder engagement methodology is guided by numerous concepts. These principles align with the AA1000 *Stakeholder Engagement Standard* (AA1000SES) from 2015 and ISO 26000.

- **Inclusivity**
Inclusivity is the participation of stakeholders in developing and achieving an accountable and strategic response to sustainability. Bank Raya accepts its accountability to those affected and those affected.
- **Materiality**
Materiality determines the relevance and significance of an issue for the Bank and its stakeholders. Material problems are problems that will affect the decisions, actions and performance of the Bank or its stakeholders.

• *Responsiveness*

Responsiveness adalah respon Bank terhadap masalah pemangku kepentingan yang mempengaruhi kinerja keberlanjutannya, dan diwujudkan melalui keputusan, tindakan dan kinerja, serta komunikasi dengan pemangku kepentingan.

• *Responsiveness*

Responsiveness is the Bank's response to stakeholder issues that affect its sustainability performance, and is realized through decisions, actions and performance, as well as communication with stakeholders.

Berdasarkan prinsip-prinsip tersebut, Bank menggunakan metodologi identifikasi pemangku kepentingan berdasarkan AA1000 *Stakeholder Engagement Standard* (AA1000SES) 2015 dan ISO 26000 sebagai panduan identifikasi dan interaksi pemangku kepentingan. Bank menggunakan hasil identifikasi tersebut dalam menjalankan pelibatan pemangku kepentingan (*stakeholder engagement*), pemetaan hal-hal yang menjadi perhatian pemangku kepentingan, dan merumuskan program-program berdasarkan kebutuhan dan harapan pemangku kepentingan.

Based on these principles, the Bank employs a stakeholder identification technique that is guided by the 2015 AA1000 Stakeholder Engagement Standard (AA1000SES) and ISO 26000. The Bank utilises the identification findings to engage stakeholders, map issues of importance to stakeholders, and develop programmes based on stakeholder needs and expectations.

Metode Identifikasi Kelompok Pemangku Kepentingan

Method for Identifying Stakeholder Groups

<i>Dependency (D)</i>	Kelompok atau individu yang secara langsung atau tidak langsung bergantung pada aktivitas, produk atau layanan dan kinerja Bank, atau sebaliknya Groups or individuals who directly or indirectly depend on the Bank's activities, products or services and performance, or vice versa
<i>Responsibility (R)</i>	Kelompok atau individu yang memiliki, atau di masa depan mungkin memiliki, organisasi hukum, tanggung jawab komersial, operasional atau etika/moral atau sebaliknya Groups or individuals who have, or may in the future have, legal organisation, commercial, operational or ethical/moral responsibilities or otherwise
<i>Tension (T)</i>	Kelompok atau individu yang membutuhkan perhatian segera dari organisasi terkait dengan masalah keuangan, ekonomi, sosial atau lingkungan yang lebih luas Groups or individuals requiring immediate attention from the organisation regarding broader financial, economic, social or environmental issues
<i>Influence (I)</i>	Kelompok atau individu yang dapat berdampak pada Bank atau pemangku kepentingan pengambilan keputusan strategis atau operasional Groups or individuals that can impact the Bank or its stakeholders in strategic or operational decision-making
<i>Diverse Perspective (DP)</i>	Kelompok atau individu yang pandangannya berbeda dapat mengarah pada pemahaman baru tentang situasi dan identifikasi peluang untuk tindakan yang mungkin tidak terjadi Groups or individuals whose views differ can lead to a new understanding of the situation and the identification of opportunities for action that may not occur
<i>Proximity (P)</i>	Kelompok atau individu yang memiliki kedekatan geografis dengan wilayah operasional Bank Groups or individuals who have geographical proximity to the Bank's operational area

Berdasarkan metode identifikasi pemangku kepentingan, Bank selalu berusaha secara optimal untuk melibatkan para pemangku kepentingan dalam kegiatan operasional Bank. Proses pelibatan pemangku kepentingan mencakup upaya Bank untuk memenuhi harapan dari setiap pemangku kepentingan dengan menggunakan sumber daya yang dimiliki, dengan cara yang tepat, dapat dipertanggungjawabkan, serta tidak bertentangan dengan ketentuan yang diatur dalam peraturan perundang-undangan yang berlaku.

The Bank's operational operations are constantly optimised via the use of the stakeholder identification approach. The stakeholder engagement process entails the Bank's attempts to satisfy each stakeholder's expectations via the prudent use of available resources in accordance with existing rules and regulations.

Bank secara berkala melakukan identifikasi terhadap pemangku kepentingan eksternal yang perlu dilibatkan atau tidak perlu dilibatkan

The Bank conducts quarterly assessments of external stakeholders to determine whether they should be engaged in or not be involved

dalam kegiatan operasional Bank. Metode pelibatan pemangku kepentingan kami tentukan berbeda-beda sesuai dengan kebutuhan dan harapan para pemangku kepentingan. Berbagai forum komunikasi baik formal maupun informal terus dilakukan agar kami dapat senantiasa terdepan dalam menjawab berbagai tantangan, kebutuhan, dan keinginan para pemegang kepentingan untuk nantinya kami dapat melakukan penyesuaian, perubahan, atau penggantian berbagai program atau kebijakan Bank demi meningkatkan performa kinerja Bank dan tetap sejalan dengan visi dan misi Bank.

in the Bank's operational operations. Our approach to stakeholder involvement differs according to the stakeholders' requirements and expectations. Numerous communication forums, both formal and informal, are maintained to ensure that we are always ahead of the curve in responding to the challenges, needs, and desires of stakeholders, so that we can later adjust, change, or replace various Bank programmes or policies in order to improve the Bank's performance and remain consistent with the Bank's vision and mission.

Pemangku Kepentingan Stakeholders [GRI 102-40]	Basis Identifikasi Identification Base [GRI 102-42]	Topik Pembahasan Discussion Topic [GRI 102-44]	Metode Pelibatan Engaging Method [GRI 102-43]	Pendekatan dan Respons Approach and Response [GRI 102-43]	Frekuensi Pendekatan Approach Frequency [GRI 102-43]
Pemegang Saham	D, R, I, P Hubungan ekonomi, kepemilikan dan legal	Peningkatan kinerja	RUPS dan RUPSLB	Pelaporan Kinerja Bank pada RUPS	Setiap Tahun dan /atau kapan dibutuhkan
Shareholders	D, R, I, P Economic, ownership and legal relations	Prformance improvement	AGMS and EGMS	Bank Performance Reporting at the GMS	Annually and/or when required
Pemerintah & Otoritas Jasa Keuangan	D, R, T, I, DP, P Legal & kepentingan LJK	Tersedianya ketentuan dan kebijakan yang jelas atas program yang dikembangkan	Pelaporan kerja yang teratur kepada regulator dan pemerintah	Pelaporan pelaksanaan Kepatuhan dan notifikasi pada Otoritas Jasa Keuangan (OJK)	Minimal 5 (lima) kali dalam setahun melalui laporan kuartalan dan laporan tahunan
Governement & Financial Services Authority	D, R, T, I, DP, P Legal & Financial Services Institution interests	Existence of unambiguous regulations and policies governing the designed software	Work that is regularly reported to regulators and the government	Reporting on compliance implementation and notifying the Financial Services Authority (OJK)	Minimum of 5 (five) times each year through quarterly and yearly reports
Masyarakat	D, R, T, I, DP, P Relasi sosial, lisensi sosial, tanggung jawab sosial, serta kedekatan dengan Bank Raya	1. Program CSR 2. Peningkatan edukasi dan pemahaman penggunaan keuangan yang efektif	Kerja sama strategis untuk menjalankan program-program tanggung Jawab Sosial perusahaan, baik di bidang sosial maupun lingkungan	1. Optimalisasi Program CSR. 2. Meningkatkan kesejahteraan masyarakat 3. Memberikan konsultasi dan pelatihan yang lebih luas mengenai perencanaan keuangan kepada masyarakat luas.	Sepanjang tahun melalui aktivitas CSR
Community	D, R, T, I, DP, P Relationships with others, social licence, social duty, and proximity to Bank Raya	1. Corporate Social Responsibility Program 2. Increased education and awareness of the proper use of funds	Collaboration on a strategic level to implement corporate social responsibility initiatives in the social and environmental spheres	1. Optimisation of Corporate Social Responsibility (CSR) Programs. 2. Enhancing people's well-being 3. Providing financial planning counselling and training to the broader population.	Throughout the year through CSR activities

Pemangku Kepentingan Stakeholders [GRI 102-40]	Basis Identifikasi Identification Base [GRI 102-42]	Topik Pembahasan Discussion Topic [GRI 102-44]	Metode Pelibatan Engaging Method [GRI 102-43]	Pendekatan dan Respons Approach and Response [GRI 102-43]	Frekuensi Pendekatan Approach Frequency [GRI 102-43]
Nasabah	D, R, I, P Hubungan ekonomi	- Peningkatan intensitas penyelenggaraan edukasi terkait produk dan layanan keuangan Bank, terutama bagi nasabah baru dan masyarakat yang belum teredukasi akses keuangan. - Peningkatan fasilitas dan akses perbankan serta keamanan transaksi. - Transparansi informasi layanan Bank.	- Website - Kunjungan langsung - Call center - Pengukuran kepuasan - Customer gathering	- Konsistensi penyelenggaraan program-program edukasi kepada setiap nasabah. - Meningkatkan sistem pada fasilitas dan keamanan transaksi perbankan. - Memberikan informasi akurat kepada setiap nasabah mengenai informasi terkini produk dan layanan perbankan.	Sepanjang tahun melalui customer service dan call center Bank Raya
Customers	D, R, I, P Economic relation	- Increasing the intensity of providing education related to the Bank's financial products and services, especially for new customers and the public who have not been educated on financial access. - Increasing banking facilities and access as well as transaction security. - Transparency of Bank service information.	- Website - In-person visit - Call center - Measurement of satisfaction - Customer gathering	- Consistency in the delivery of instructional programmes to individual customers. - Enhancing the system's transactional capabilities and security. - Providing each consumer with accurate information about banking goods and services.	Throughout the year through customer service and call center Bank Raya

Pemangku Kepentingan Stakeholders [GRI 102-40]	Basis Identifikasi Identification Base [GRI 102-42]	Topik Pembahasan Discussion Topic [GRI 102-44]	Metode Pelibatan Engaging Method [GRI 102-43]	Pendekatan dan Respons Approach and Response [GRI 102-43]	Frekuensi Pendekatan Approach Frequency [GRI 102-43]
Pegawai dan Organisasi Pegawai	D, R, T, I, P Legal dan pemangku kepentingan yang membantu pencapaian tujuan perusahaan	1. Hak-hak pegawai. 2. Meningkatkan efektivitas hubungan manajemen dan pegawai.	Rapat kerja dengan serikat pegawai	1. Memberikan hak penuh kepada pegawai terhadap PKB yang telah ditetapkan. 2. Melakukan pertemuan berkala antara manajemen dengan pegawai.	Minimal setahun sekali
Employee and Employee's Organisation	D, R, T, I, P Legal and stakeholders who help achieve company goals	1. Employee rights. 2. Improving the effectiveness of management and employee relations.	Work meeting with union	1. Giving full rights to employees against the established PKB. 2. Conducting regular meetings between management and employees.	At least once a year
Rekanan	D, R, T, P Hubungan ekonomi dan legal	Transparansi dalam proses pengadaan	1. Kontrak Pemasok 2. Mitra investasi 3. Koordinasi operasional	Melaksanakan sistem pengadaan yang mematuhi prinsip-prinsip panduan kerja dan standar etika.	Minimal setahun sekali melalui <i>event vendor gathering</i>
Business Partner	D, R, T, P Economic and legal relations	Transparency in the procurement process	1. Supplier Contract 2. Investment partner 3. Operational coordination	Developing and implementing a procurement system that adheres to work-related concepts and ethical norms.	At least once a year through a vendor gathering event
Media Massa	T, I, DP Relasi sosial, lisensi sosial	Keterbukaan informasi yang akurat dan terkini	1. <i>Press release</i> 2. Media visit 3. <i>Press gathering</i> 4. <i>Press conference</i>	Memberikan informasi akurat mengenai berita terkini Bank Raya.	Melakukan kunjungan ke unit bisnis Perusahaan untuk memperluas dan memahami bisnis bank.
Mass Media	T, I, DP Social relations, social license	Disclosure of accurate and up-to-date information	1. Press release 2. Media visits 3. Press gathering 4. Press conference	Providing reliable information about Bank Raya's newest news.	Making visits to the Company's business divisions in order to have a better understanding of the bank's operations.

Strategi Keberlanjutan [A.1]

Sustainability Strategy [A.1]

PT Bank Raya Indonesia Tbk sebagai Lembaga Jasa Keuangan (LJK) memiliki peran yang penting untuk ikut andil dalam menjaga kelestarian lingkungan secara berkelanjutan. Dengan dana yang dikelola dan kemudian disalurkan kepada masyarakat, maka Bank Raya dituntut untuk bisa selektif dalam memberikan pembiayaan kepada nasabah dengan menghindarkan pada kegiatan usaha yang dapat merusak lingkungan hidup. Dalam hal ini, Bank Raya menyadari pentingnya isu pengelolaan keuangan berkelanjutan dengan mengedepankan prinsip *triple bottom line* (*people, profit dan planet*) dalam kegiatan usaha Bank dengan menyelaraskan aspek Lingkungan, Sosial dan Tata Kelola (LST).

Bank Raya berkomitmen untuk menerapkan keuangan berkelanjutan sebagaimana diatur dalam Peraturan OJK No.51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten dan Perusahaan Publik. Berdasarkan regulasi tersebut, Bank Raya telah menyusun Rencana Aksi Keuangan Berkelanjutan (RAKB), yang merupakan bagian dari rencana bisnis atau perencanaan strategis Bank dengan implementasi untuk pertama kali pada tahun 2020. Untuk tahun buku 2021, Bank Raya juga menyusun RAKB 2021.

Sejalan dengan hal tersebut, Bank Raya telah mengimplementasikan program prioritas dan uraian RAKB yang akan diterapkan untuk periode 1 (satu) sampai 5 (lima) tahun ke depan atau periode 2021-2025 dimana sesuai dengan kategori BUKU II, Bank Raya telah menyusun RAKB jangka pendek pada tahun 2019, yang diimplementasikan tahun 2020, dan untuk tahun kedua, yaitu tahun 2020. Bank Raya kembali menyusun RAKB dengan fokus dapat tumbuh berkelanjutan dengan struktur bisnis yang kuat dan sehat melalui fokus pada sektor agro dan UMKM yang sejalan dengan visi dan misi Bank dengan tetap memperhatikan aspek Lingkungan, Sosial dan Tata Kelola (LST) pada operasi bisnis untuk memenuhi konsep pembangunan berkelanjutan.

Nilai Keberlanjutan Bank Raya

Sustainable Values of Bank Raya

Menciptakan nilai lebih bagi para *stakeholders* dan berupaya untuk terus berkontribusi pada unsur 3p (*profit, people dan planet*) menjadi ide utama dalam nilai-nilai keberlanjutan yang ditetapkan Bank. Sebagai bagian dari Inisiatif Keuangan Berkelanjutan Indonesia (IKBI), Bank berkomitmen mewujudkan penerapan praktik keuangan berkelanjutan yang inklusif dan lebih ramah lingkungan pada sektor jasa keuangan, serta mampu berkontribusi dalam menggerakkan ekonomi masyarakat, menjaga kelestarian lingkungan.

Hal ini diawali dengan upaya Bank dalam membangun ekosistem yang selaras dengan inisiatif keuangan berkelanjutan yang telah diamanatkan oleh regulator. Seiring dengan hal tersebut, Bank

As a Financial Services Institution (LJK), PT Bank Raya Indonesia Tbk has a critical responsibility to play in conserving the environment in a sustainable way. Bank Raya is expected to be selective in providing credit to clients by avoiding business operations that have a negative impact on the environment. Bank Raya recognises the critical nature of sustainable financial management by emphasising the triple bottom line concept (*people, profit, and planet*) in all of its business operations and by integrating Environmental, Social, and Governance (LST) considerations.

Bank Raya is dedicated to implementing sustainable finance in accordance with OJK Regulation No.51/POJK.03/2017 on the Sustainable Finance Implementation for Financial Service Institutions, Issuers, and Public Companies. Bank Raya has developed a Sustainable Finance Action Plan (RAKB) in accordance with this requirement. The strategy is integrated into the bank's business plan or strategic planning and will be implemented for the first time in 2020. Bank Raya is also developing the 2021 RAKB for the fiscal year beginning January 1, 2021.

In accordance with this, Bank Raya has implemented priority programmes and a description of the RAKB that will be implemented over the next one to five years, or from 2021 to 2025, where Bank Raya has prepared a short-term RAKB in accordance with the TIER II category in 2019, which will be implemented in 2020, and for the second year, 2020. Bank Raya restructured the RAKB with a focus on sustainable growth and a strong and healthy business structure, with a particular emphasis on agriculture and MSMEs, in line with the Bank's vision and mission, and by continuing to pay attention to the Environmental, Social, and Governance (LST) aspects of business operations in order to adhere to the concept of sustainable development.

Increasing value for stakeholders and trying to continue contributing to the 3p aspects (*profit, people, and planet*) is the overarching concept behind the Bank's sustainability values. As a member of the Indonesian Sustainable Finance Initiative (IKBI), the Bank is committed to implementing inclusive and environmentally friendly sustainable finance practises in the financial services sector, as well as to contributing to the community's economic development while preserving the environment.

This starts with the Bank's attempts to create an environment that is consistent with the regulator-mandated sustainable finance strategies. Additionally, the Bank is committed to accelerating

bertekad untuk meningkatkan pertumbuhan bisnis yang berkelanjutan dengan didukung oleh pembangunan ekosistem bisnis yang relevan termasuk di dalamnya sinergi para *stakeholders* dan penyesuaian-penyesuaian dalam internal Bank serta upaya peningkatan portofolio produk dan/atau jasa keuangan berkelanjutan.

Melalui ekosistem yang dibangun tersebut, Bank akan terus berinovasi, bersinergi dan berkolaborasi bersama dengan seluruh *stakeholders* guna menciptakan pertumbuhan usaha yang berkesinambungan sehingga dapat berkontribusi dalam membangun perekonomian Indonesia, melestarikan lingkungan hidup dan meningkatkan kesejahteraan masyarakat.

sustainable business growth via the creation of appropriate business ecosystems, including stakeholder collaboration and internal modifications, as well as initiatives to diversify its offering of sustainable financial products and/or services.

Children will continue to innovate, synergize, and work with all stakeholders to generate sustainable economic growth, therefore contributing to the development of the Indonesian economy, environmental preservation, and human welfare.

Komitmen Terhadap Penerapan Prinsip-Prinsip Keuangan Berkelanjutan

[GRI 102-16][F.1]

Commitment to the Implementation of the Principles of Sustainable Finance [GRI 102-16][F.1]

Bank memiliki komitmen untuk melaksanakan prinsip - prinsip Keuangan Berkelanjutan, khususnya 8 (delapan) prinsip Keuangan Berkelanjutan yang telah dituangkan dalam Peraturan OJK No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik, sebagai berikut.

1. Prinsip Investasi Bertanggung Jawab
adalah pendekatan investasi yang mempertimbangkan faktor ekonomi, sosial, lingkungan hidup, dan tata kelola dalam keputusan investasi yang bertujuan agar dapat mengelola risiko secara lebih baik. Kami menerapkan prinsip ini melalui pemberian kredit ramah lingkungan, yang mensyaratkan dokumen tertentu. Selain itu, kami juga berinvestasi pada program-program CSR yang mempertimbangkan aspek ekonomi, sosial, dan lingkungan hidup.
2. Prinsip Strategi dan Praktik Bisnis Berkelanjutan
Kami menerapkan prinsip ini dengan menuangkannya pada kebijakan keberlanjutan yang dituangkan dalam RAKB (Rencana Aksi Keuangan Berkelanjutan) yang menjadi landasan kami dalam menjalankan bisnis berkelanjutan di operasional Bank.
3. Prinsip Pengelolaan Risiko Sosial dan Lingkungan Hidup
Kami telah memiliki prinsip kehati-hatian dalam mengukur risiko yang dikelola dalam sistem manajemen risiko perusahaan. Selain risiko-risiko keuangan, kami juga mengukur risiko sosial dan lingkungan hidup dari aktivitas operasi Bank, seperti dalam hal pemberian kredit atau pinjaman. risiko sosial dan lingkungan hidup ini menjadi pertimbangan kami untuk memberikan pinjaman atau kredit pada usaha yang bersentuhan langsung dengan aspek sosial dan lingkungan hidup, sehingga tidak menimbulkan dampak negatif bagi kegiatan operasi Bank.

The Bank is committed to adopting sustainable finance concepts, namely the eight (eight) principles set out in FSA Regulation No. 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Service Institutions, Issuers, and Public Companies.

1. Responsible Investment Principles
It is an investing strategy that takes economic, social, environmental, and governance concerns into account while making investment choices with the goal of managing risk more effectively. This idea is implemented by the issue of green credit, which is subject to specific documentation requirements. Additionally, we invest in CSR initiatives that take economic, social, and environmental factors into account.
2. Sustainable Business Strategy and Practice Principles
This philosophy is embodied in the Bank's sustainability policy, as defined in the RAKB (Sustainable Finance Action Plan), which serves as the basis for doing business in a sustainable manner.
3. Social and Environmental Risk Management Principles
We currently use the prudential concept when assessing risks addressed by the company's risk management system. Along with financial risks, we assess social and environmental hazards associated with the Bank's operations, such as credit or loan provision. This social and environmental risk is taken into account when granting loans or credit to firms that directly affect social and environmental issues, to ensure that they do not have a detrimental effect on the Bank's operations.

4. Prinsip Tata Kelola

Kami menerapkan tata kelola keberlanjutan (ekonomi, lingkungan dan sosial) yang dibangun berdasarkan prinsip-prinsip; transparansi, akuntabel, bertanggung jawab, independen, profesional, setara dan wajar.

5. Prinsip Komunikasi yang Informatif

Kami menyediakan laporan yang informatif mencakup strategi, tata kelola, kinerja dan prospek Bank yang dapat dengan mudah diakses oleh para *stakeholder* melalui situs web Bank <https://bankraya.co.id/>

6. Prinsip Inklusif

Bank menjamin ketersediaan dan keterjangkauan produk dan/atau jasa yang dapat dengan mudah diakses oleh konsumen kami. Bahkan kami menyediakan penerapan praktik keuangan berkelanjutan yang inklusif yang menjangkau masyarakat luas.

7. Prinsip Pengembangan Sektor Unggulan Prioritas

Dalam menyusun program keberlanjutan, kami mempertimbangkan sektor-sektor unggulan prioritas yang telah kami tetapkan dalam RAKB Bank. Hal ini kami lakukan untuk mendukung pencapaian tujuan pembangunan berkelanjutan dan mendukung program pemerintah dalam menerapkan prinsip keuangan berkelanjutan.

8. Prinsip Koordinasi dan Kolaborasi [GRI 102-12; GRI 102-13]

Kami aktif dalam forum/kegiatan/kerja sama terkait Bisnis Berkelanjutan, baik dalam tingkat regional/nasional/lokal, dalam rangka penyalarsan strategi keberlanjutan perusahaan. Hal ini terlihat dari keanggotaan perusahaan pada perbanas, Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP), asosiasi emiten Indonesia, Lembaga Alternatif Penyelesaian Sengketa Perbankan Indonesia (LAPSPI), dll

4. Principles of Governance

We practise sustainable governance (economic, environmental, and social) based on the values of openness, accountability, and responsibility, as well as independence, professionalism, equity, and fairness.

5. Informative Communication Principles

We give insightful reports on the Bank's strategy, governance, performance, and prospects, which stakeholders may readily access through the Bank's website at <https://bankraya.co.id/>.

6. Principle of Inclusiveness

The Bank ensures the accessibility and affordability of goods and/or services that our customers may readily obtain. Indeed, we facilitate the adoption of inclusive sustainable financial methods that benefit the whole community.

7. Priority Sector Development Principles

When developing the sustainability programme, we take into account the Bank's RAKB's main leading sectors. This is to assist in the attainment of sustainable development objectives and the implementation of sustainable finance principles by government initiatives.

8. Coordination and Collaboration Principles [GRI 102-12; GRI 102-13]

We participate in forums/activities/collaborations on Sustainable Business at the regional, national, and local levels, with the goal of harmonising the company's sustainability strategy. This is shown by the company's involvement in the banking sector, the Communication Forum for Banking Compliance Directors (FKDKP), the association of Indonesian issuers, and the Indonesian Banking Dispute Settlement Alternative Institute (LAPSPI), among other organisations.

Tujuan Rencana Aksi Keuangan Berkelanjutan The Sustainable Finance Action Plan's objectives

Tujuan RAKB Bank Raya sampai dengan tahun 2025 adalah meningkatkan daya tahan dan daya saing Bank dalam menghadapi tantangan dunia perbankan yang semakin dinamis. Mengingat bahwa era perkembangan teknologi semakin canggih, visi Bank Raya ke depannya akan menjadi *Digital Attacker* dengan tetap berorientasi pada pembangunan berkelanjutan (*Sustainable Development Goals/SDGs*) baik dari sisi aset (*assets*), kewajiban (*liabilities*), serta operasional dan sumber daya manusia (*SDM*).

Bank Raya's RAKB through 2025 aims to strengthen the bank's resilience and competitiveness in the face of an increasingly dynamic banking environment. Given the rising sophistication of technology development, Bank Raya's future ambition is to become a *Digital Attacker* while being committed to sustainable development (*Sustainable Development Goals/SDGs*) in terms of assets, liabilities, operations, and human resources.

Penanggung Jawab Pelaksanaan RAKB Responsible for the implementation of the RAKB

Penanggung jawab program keuangan berkelanjutan adalah Direktur yang membawahi *Desk Enterprise Risk Management* sebagai Unit Kerja yang bertugas dan bertanggung jawab untuk menyusun RAKB, melakukan *monitoring* keuangan berkelanjutan dan melaporkan hasil pelaksanaan keuangan berkelanjutan yang telah dilakukan oleh Bank Raya kepada Otoritas Jasa Keuangan (OJK). Penanggung jawab kegiatan disesuaikan dengan uraian prioritas kegiatan dan target kegiatan sebagaimana disampaikan untuk *Roadmap* tahun 2021- 2025.

The Director is responsible for the sustainable finance programme. He or she oversees the Risk Management Desk as a straightforward work unit that is responsible for compiling the RAKB, monitoring sustainable finance, and reporting to the Financial Services Authority on the results of Bank Raya's implementation of sustainable finance (OJK). The activity's lead is matched to the description of the activity's aims and objectives as presented for the 2021-2025 Roadmap.

Realisasi RAKB tahun 2021 RAKB Realisation in 2021

Sampai dengan posisi Desember 2021, produk keuangan berkelanjutan Bank Raya mencapai Rp2,26 Triliun lebih rendah 18,39% dari tahun sebelumnya Rp2,77 triliun.

Bank Raya's sustainable financial products reached IDR 2.26 trillion in December 2021, down 18.39% from the previous year's IDR 2.77 trillion.

No	Target Waktu Target Time	Uraian Kegiatan Description of activities	Indikator Keberhasilan Success Indikator	Penanggung Jawab Kegiatan PIC	SDG's	Keterangan Description
1.	Desember 2021	<i>Mapping debitur</i> kelapa sawit yang telah memenuhi sertifikasi lingkungan hidup (ISPO/RSPo).	Memiliki sertifikasi lingkungan hidup ISPO/ RSPo untuk debitur kelapa sawit minimal 45% (tiga puluh persen) dari total portofolio debitur kelapa sawit.	Divisi. Menengah & Non Agri	12 & 13	Telah melampaui target yang ditetapkan.
	December 2021	Mapping of oil palm debtors who have met environmental certification (ISPO/RSPo).	Have an ISPO/RSPo environmental certification for oil palm debtors at least 45% (thirty percent) of the total portfolio of oil palm debtors.	Medium & Non Agri Division		Have exceeded the target set.
2.	Desember 2021	Meningkatkan pertumbuhan kredit kepada usaha-usaha yang masuk dalam kategori Usaha Mikro, Kecil dan Menengah (UKM) sebesar 2 (dua)% dari portofolio KYD UKM tahun sebelumnya.	Adanya Usaha Mikro, Kecil dan Menengah (UKM) yang Berwawasan Lingkungan.	- Divisi Ritel Agri Crawl Up - Divisi Sales & Partnership	1, 2, 3, dan 8 1, 2, 3, and 8	Pencapaian target UMKM pada Desember 2021 sebesar Rp 913 M turun 80,88% jika dibandingkan Desember 2020 sebesar Rp4,77 T.
	December 2021	Increase credit growth to businesses that are included in the category of Micro, Small and Medium Enterprises (SMEs) by 2 (two)% of the SME KYD portfolio the previous year.	The existence of Micro, Small and Medium Enterprises (UKM) with Environmental Insight.	- Retail Agri Crawl Up Division - Sales & Partnership Division		The achievement of the MSME target in December 2021 was IDR 913 billion, a decrease of 80.88% compared to December 2020 of IDR 4.77 billion.

No	Target Waktu Target Time	Uraian Kegiatan Description of activities	Indikator Keberhasilan Success Indikator	Penanggung Jawab Kegiatan PIC	SDG's	Keterangan Description
3.	September 2021	Pelaksanaan literasi keuangan dan akuisisi nasabah (deposan dan debitur) dari para petani tambak mitra (<i>e-fishery</i>).	Terjalannya kerjasama yang efektif sehingga pemahaman mengenai Keuangan berkelanjutan dapat terlaksana dengan baik.	Divisi Sales & Partnership	4	Pelaksanaan literasi keuangan dan akuisisi nasabah di Desa Binaan Lebak, Provinsi Banten. Dari kegiatan ini terdapat realisasi pinjaman Pinang dari 616 petani jagung dengan total outstanding sebesar Rp15,38 miliar.
	September 2021	Implementation of financial literacy and customer acquisition (depositors and debtors) from partner pond farmers (<i>e-fishery</i>).	Establishing effective collaboration so that an understanding of sustainable finance can be carried out properly.	Sales & Partnership Division		Implementation of financial literacy and customer acquisition in the Assisted Village of Lebak, Banten Province. From this activity there was the realization of Pinang loans from 616 corn farmers with a total outstanding of IDR 15.38 billion.
4.	Desember 2021	Persiapan Untuk Penerbitan <i>Green Bond</i> .	<i>Due Dilligence</i>	Divisi Keuangan & Treasury		Tidak terlaksana karena sesuai arahan Perusahaan Induk bahwa dalam 5 (lima) tahun ke depan tidak ada kegiatan yang berkaitan dengan obligasi.
	December 2021	Preparation For Issuance of Green Bonds.	Due Dilligence	Finance & Treasury Division		Not implemented because according to the direction of the Parent Company that in the next 5 (five) years there will be no activities related to bonds.
5.	Juni 2021	Mengadakan Training (<i>inhouse/public course</i>) atau <i>workshop</i> terkait Keuangan Berkelanjutan kepada Internal Pekerja.	1. Meningkatkan kompetensi pekerja. 2. Meningkatkan kepuasan Nasabah.	Divisi Human Capital	4 & 8	Sesuai dengan target yang ditetapkan.
	June 2021	Conduct training (<i>inhouse/public course</i>) or workshops related to Sustainable Finance for Internal Workers.	1. Improve worker competence. 2. Increase customer satisfaction.	Human Capital Division		In accordance with the target set.

No	Target Waktu Target Time	Uraian Kegiatan Description of activities	Indikator Keberhasilan Success Indikator	Penanggung Jawab Kegiatan PIC	SDG's	Keterangan Description
6.	September 2021	Mengadakan <i>On The Job Training</i> dengan mengirimkan Pejabat Kredit Lini (PKL) yang berada di Kantor Pusat & Kantor Cabang ke Perusahaan debitur yang sudah menerapkan sertifikasi lingkungan (dilakukan secara tatap muka/daring).	1. Meningkatkan pemahaman debitur UKM mengenai keuangan berkelanjutan. 2. Meningkatkan kepuasan Nasabah.	• Divisi Ritel Agri Crawl Up • Divisi Sales & Partnership • Divisi Human Capital	4 & 8	Dikarenakan adanya pandemi covid 19 maka kegiatan <i>On The Job Training</i> ke perusahaan debitur belum dapat terlaksana.
	September 2021	Hol On The Job Training by sending Line Credit Officers (PKL) who are at the Head Office & Branch Offices to debtor companies that have implemented environmental certification (done face-to-face/online).	1. Improve the understanding of SME debtors regarding sustainable finance. 2. Increase customer satisfaction.	• Retail Agri Crawl Up Division • Sales & Partnership Division • Human Capital Division		Due to the COVID- 19 pandemic, On The Job Training activities for debtor companies have not been able to be carried out.
7.	September 2021	Melakukan kegiatan edukasi kepada debitur segmen UKM dalam rangka turut menyaksikan Program Keuangan Berkelanjutan secara tatap muka/daring.	1. Meningkatkan pemahaman debitur UKM mengenai keuangan berkelanjutan. 2. Meningkatkan kepuasan Nasabah.	• Divisi Ritel Agri Crawl Up • Divisi Sales & Partnership	4 & 8	Telah dilaksanakannya event Pinang Raya untuk melakukan branding sekaligus membahas literatur keuangan.
	September 2021	Conduct educational activities for debtors of the SME segment in order to participate in the success of the Face-to-face/online Sustainable Finance Program.	1. Improve the understanding of SME debtors regarding sustainable finance. 2. Increase customer satisfaction.	• Retail Agri Crawl Up Division • Sales & Partnership Division		The Pinang Raya event was designed to promote the company's brand and to debate financial literature.
8.	Desember 2021	Pelaksanaan Program Desa Binaan dan kegiatan Edukasi Literasi Keuangan.	Pelaksanaan Program Desa Binaan dan kegiatan Edukasi Literasi Keuangan.	Divisi Sekretariat Perusahaan	1, 2, 3, 4 & 11	Desa Digital terlaksana di Desa Bulakan Provinsi Banten pada bulan Desember 2021. Kegiatan ini terdiri dari pembangunan Infrastruktur Desa berupa Gardu Pandang dan gapura akses masuk desa dan kegiatan edukasi mengenai literasi keuangan kepada para petani jagung. Serta CSR Pendidikan berupa bantuan buku paket kepada SMK Pertanian Paedah Kencana

No	Target Waktu Target Time	Uraian Kegiatan Description of activities	Indikator Keberhasilan Success Indikator	Penanggung Jawab Kegiatan PIC	SDG's	Keterangan Description
	December 2021	Implementation of the Assisted Village Program and Financial Literacy Education activities.	Implementation of the Assisted Village Program and Financial Literacy Education activities.	Corporate Secretariat Division	1, 2, 3, 4 & 11	The Digital Village will be implemented in Bulakan Village, Banten Province in December 2021. This activity consists of developing Village Infrastructure in the form of a viewing post and village access gates and educational activities regarding financial literacy for corn farmers. And CSR Education in the form of package book assistance to the Paedah Kencana Agricultural Vocational School
9.	Desember 2021	Menggalang budaya kerja pengurangan penggunaan kertas/plastik (<i>paper less/plastic less</i>), hemat Energi Listrik dan Bahan Bakar Minyak (BBM) untuk seluruh pekerja BRI Agro dalam rangka mendukung transformasi perilaku konsumen dan pengendalian polusi.	1. Penggunaan Tumblr/gelas di setiap Rapat & Training. 2. Penurunan Penggunaan ATK. 3. Peningkatan Utilitas <i>e-office</i>/ email. 4. Penurunan Penggunaan Listrik (Kwh) dan penghematan air. 5. Penurunan Penggunaan Bahan Bakar Minyak (Liter).	Divisi Operasional, Jaringan & Layanan Bagian Umum & Logistik	3 & 13	Sesuai dengan target yang ditetapkan. Selain itu telah dipasang sticker- sticker tentang penghematan penggunaan listrik pada beberapa sudut kantor sebagai upaya untuk meningkatkan awareness pekerja.
	December 2021	Promote a work culture of reducing the use of paper/ plastic (<i>paper less/plastic less</i>), saving electricity and fuel oil (BBM) for all BRI Agro employees in order to support the transformation of consumer behavior and control pollution.	1. Use of Tumblr/ glass at every Meeting & Training . 2. Decrease in ATK Usage. 3. Improved <i>e-office</i> / email Utilities . 4. Decrease in Electricity Usage (Kwh) and save water. 5. Decrease in the Use of Fuel Oil (Liters).	Operations, Network & Service General & Logistics Division		In conformity with the objectives established. Additionally, stickers promoting energy conservation have been placed throughout the office in an effort to raise employee awareness.

Dalam mendukung program pemerintah untuk mencapai *Sustainability Development Goals* (SDGs), Bank Raya berfokus memperbaiki perekonomian Indonesia menjadi lebih baik dengan menerapkan strategi transformasi dalam menyasar sektor *Gig Economy* melalui pendekatan *digital end-to-end* secara menyeluruh. sektor *Gig*

Bank Raya is committed to assisting the government in achieving the Sustainable Development Goals (SDGs) by implementing a transformation strategy focused on the Gig Economy sector through a comprehensive end-to-end digital approach. The Gig Economy is a labour market that has historically been associated with temporary

Economy merupakan pasar tenaga kerja yang selama ini identik dengan karyawan kontrak jangka pendek (*half-unemployed*) atau pekerja lepas (*freelancer*). Bank Raya akan terus memaksimalkan penggunaan aplikasi Pinang untuk meningkatkan akselerasi kredit. Sampai dengan Desember 2021, Bank Raya telah menyalurkan kredit UMKM sebesar Rp913 Miliar dengan total 2.983 NoA untuk membantu para pengusaha kecil dalam menumbuhkan usahanya.

Upaya lain yang telah dilakukan Bank Raya dalam mendukung keuangan berkelanjutan adalah dengan mensyaratkan Sertifikasi Lingkungan Hidup untuk portfolio Debitur Kelapa Sawit yaitu Sertifikasi *Indonesian Sustainable Palm Oil (ISPO)/Roundtable on Sustainable Palm Oil (RSPO)*. Sertifikasi ini bertujuan untuk memastikan bahwa sistem usaha di bidang perkebunan kelapa sawit telah ramah lingkungan dan dilakukan secara berkelanjutan baik dari sisi sosial maupun lingkungan. Kepemilikan Sertifikat ISPO/RSPO untuk portfolio Debitur Kelapa Sawit di Bank Raya sebanyak 13 debitur dari total 23 Debitur portofolio Kelapa Sawit (56,52%).

Disisi lain dalam meningkatkan kapabilitas internal pekerja Bank Raya dalam meningkatkan wawasan dan *awareness* pekerja untuk berinovasi terhadap pengembangan produk atau pun jasa dalam implementasi penerapan program keuangan berkelanjutan, maka telah diikutsertakan 35 orang pekerja *Account Officer* untuk mengikuti pendidikan *Sustainable Finance Awareness Batch 1* pada tanggal 5 – 6 Juli 2021 dan 30 orang *Funding Officer* untuk mengikuti pendidikan *Sustainable Finance Awareness* pada tanggal 23 November – 7 Desember (7 kali pertemuan). Pendidikan ini diselenggarakan secara *online* oleh Lembaga Pengembangan Perbankan Indonesia (LPPI) dengan narasumber praktisi perbankan. Selain itu, *Desk Enterprise Risk Management – Bagian Enterprise Risk & Portofolio Management (EPM)* telah melaksanakan *E-Learning* terkait dengan keuangan berkelanjutan pada tanggal 27 – 28 Oktober 2021. *E-Learning* ini diikuti oleh 630 peserta dari total 866 pekerja (73,67%). *E-Learning* dilakukan secara mandiri dengan tahapan mengisi *pre test*, belajar bahan materi, dan mengisi *post test* dengan menggunakan media *google forms*.

Bank Raya telah melaksanakan kegiatan Desa Digital di Desa Bulakan Kecamatan Gunungkencana Kabupaten Lebak Provinsi Banten. Kegiatan ini dilakukan untuk pembangunan Gapura Banten *Corn Farming* dalam Program Agro Solution Penanaman Jagung Petani Binaan LMDH Giri Mukti Bulakan dengan total biaya sebesar Rp58 Juta. Tujuan diadakannya pembangunan gapura adalah sebagai simbol agro wisata/edu wisata *agriculture* dalam mewadahi dan membina warga masyarakat untuk melakukan kegiatan positif dan produktif seperti bertani dan berkebun. Gapura juga merupakan ciri khas bangunan estetika yang mempunyai nilai dan fungsi tersendiri salah satunya sebagai petunjuk yang memudahkan masyarakat untuk memasuki suatu wilayah. Kegiatan yang dilakukan adalah penanaman jagung yang dibiayai Bank Raya dengan jumlah petani sebanyak 572 orang dengan luas area perkebunan sebesar

contract workers (*half-employed*) or freelancers. Bank Raya will continue to leverage the Pinang application to accelerate lending growth. Bank Raya had disbursed IDR 913 billion in MSME loans with a total of 2,983 NoA to assist small entrepreneurs in growing their businesses as of December 2021.

Bank Raya has also taken steps to promote sustainable finance by requiring environmental certification for its palm oil debtor portfolio, specifically the Indonesian Sustainable Palm Oil (ISPO)/Roundtable on Sustainable Palm Oil (RSPO) Certification. This certification aims to ensure that the oil palm plantation sector's business practises are environmentally friendly and socially and environmentally sustainable. Bank Raya owns ISPO / RSPO Certificates for 13 of its 23 oil palm debtors (56.52%).

On the other hand, to strengthen the internal capabilities of Bank Raya employees and to increase employee insight and awareness regarding product or service development and implementation of sustainable finance programmes, 35 Account Officer employees have been included in the Sustainable Finance Awareness Batch 1 education scheduled for 5 – 6 July 2021 and 30 Funding Officer employees have been included in the Sustainable Finance Awareness Batch 2 education scheduled for 23 November – 7 December 2021. (7 meetings). The Indonesian Banking Development Institute (LPPI) offers this instruction online, with banking practitioners serving as resource persons. Additionally, on October 27 – 28, 2021, the Enterprise Risk Management Desk – Enterprise Risk & Portfolio Management (EPM) conducted E-Learning on sustainable finance. 630 people from a total of 866 employees participated in this e-Learning (73.67%). E-learning is self-paced, with stages of completing pre-tests, studying materials, and completing post-tests via Google Forms media.

In Bulakan Village, Gunungkencana District, Lebak Regency, Banten Province, Bank Raya has promoted village activities. This activity was undertaken to fund the construction of the Banten Corn Farming Gate as part of LMDH Giri Mukti Bulakan's Agro Solution Program for Corn Planting Assisted Farmers, at a cost of IDR 58 million. The gate serves as a symbol of agro-tourism / agriculture tourism education by accommodating and encouraging community members to engage in positive and productive activities such as farming and gardening. The gate is also a distinguishing feature of beautiful structures, which have their own inherent values and functions, one of which is to act as a guide, making it simpler for visitors to enter an area. The operation is planting corn, which is supported by Bank Raya and involves a total of 572 farmers with an 800-hectare plantation area. These initiatives resulted in the repayment of

800 Hektar. Dari kegiatan tersebut terdapat realisasi pinjaman Pinang dari 616 petani jagung dengan total *outstanding* sebesar Rp15,38 miliar. Selain itu juga Bank Raya memberikan bantuan CSR Pendidikan berupa buku paket untuk SMK Pertanian Paedah Kencana. Siswa/siswi yang terdapat di sekolah tersebut adalah anak-anak dari penerima penyaluran Pinang dalam Program Mekar, sehingga diharapkan dapat memberikan pengetahuan terhadap pengelolaan agribisnis secara berkelanjutan.

Pinang loans to 616 corn farmers totaling IDR 15.38 billion. In addition, Bank Raya also provided CSR Education assistance in the form of package books for the Paedah Kencana Agricultural Vocational School. The students in the school are the children of the betel nut distribution recipients in the Mekar Program, so they are expected to provide knowledge on sustainable agribusiness management.

Target RAKB Tahun 2022

RAKB Target for 2022

Rencana Aksi Keuangan Berkelanjutan Tahun 2022

Sustainable Finance Action Plan 2022

No	Target Waktu Target Time	Uraian Aktivitas Activity Description	Tujuan Aktivitas Activity Purpose	Indikator Keberhasilan Success Indicator
1.	Desember 2022	Meningkatkan pertumbuhan kredit kepada usaha-usaha yang masuk dalam kategori Usaha Kecil Menengah (UKM) sektor Gig Ekonomi Berwawasan Lingkungan untuk mendukung Program Keuangan Berkelanjutan.	Memberantas kemiskinan dan kelaparan demi terciptanya kehidupan sehat dan sejahtera serta mendorong perbaikan pada pekerjaan yang layak dan pertumbuhan ekonomi.	Adanya Usaha Mikro, Kecil dan Menengah (UKM) yang Berwawasan Lingkungan.
	December 2022	Increase credit growth to businesses that are included in the Small and Medium Enterprises (SME) category of the Gig Economics with an Environmentally Friendly sector to support the Sustainable Finance Program.	Eradicate poverty and hunger for healthy and prosperous lives and promoting improvements in decent work and economic growth.	The existence of Micro, Small and Medium Enterprises (UKM) with Environmental Insight.
2.	Desember 2022	Pelaksanaan literasi keuangan dan akuisisi nasabah dari petani mitra Agritek Company.	Mendorong pendidikan berkualitas dengan memberikan kesempatan kepada masyarakat khususnya nasabah dalam menambah pengetahuan terkait literasi keuangan.	Terjalannya kerjasama yang efektif sehingga adanya realisasi <i>outstanding</i> dari Debitur.
	December 2022	Implementation of financial literacy and customer acquisition from Agritek Company's partner farmers.	Encourage quality education by providing opportunities for the public, especially customers, to increase knowledge related to financial literacy.	Establishing effective cooperation so that there is an outstanding realization of the debtor.
3.	Desember 2022	Mengakuisisi dana - dana dari nasabah yang sudah mendukung Program Keuangan Berkelanjutan.	Mendukung pendanaan berwawasan lingkungan	Terdapat DPK dari nasabah berwawasan lingkungan.
	December 2022	Acquire funds from customers who already support the Sustainable Finance Program.	Support environmentally sound funding	There are third party funds from environmentally friendly customers.

No	Target Waktu Target Time	Uraian Aktivitas Activity Description	Tujuan Aktivitas Activity Purpose	Indikator Keberhasilan Success Indicator
4.	September 2022	Mengadakan <i>Training (inhouse/public course)</i> atau <i>workshop</i> terkait Keuangan Berkelanjutan kepada Internal Pekerja.	Mendorong perbaikan pada pekerjaan yang layak, pertumbuhan ekonomi, dan pendidikan berkualitas dengan memberikan kesempatan kepada pekerja untuk mempelajari keuangan berkelanjutan agar dapat diterapkan dalam praktik bisnis.	1. Meningkatkan kompetensi pekerja. 2. Meningkatkan kepuasan Nasabah.
	September 2022	Conduct training (inhouse/public course) or workshops related to Sustainable Finance for Internal Workers.	Encourage improvements in decent work, economic growth and quality education by providing opportunities for workers to learn sustainable finance so that it can be applied in business practice.	1. Improve worker competence. 2. Increase customer satisfaction.
5.	September 2022	Mengadakan <i>On The Job Training</i> dengan mengirimkan Pejabat Kredit Lini (PKL) yang berada di Kantor Pusat & Kantor Cabang ke Perusahaan debitur yang sudah menerapkan sertifikasi lingkungan (dilakukan secara tatap muka/daring).	Mendorong perbaikan pada pekerjaan yang layak, pertumbuhan ekonomi, dan pendidikan berkualitas dengan memberikan kesempatan kepada pekerja untuk mempelajari keuangan berkelanjutan agar dapat diterapkan dalam praktik bisnis.	1. Meningkatkan kompetensi pekerja. 2. Meningkatkan kepuasan Nasabah.
	September 2022	Hold On The Job Training by sending Line Credit Officers (PKL) who are at the Head Office & Branch Offices to debtor companies that have implemented environmental certification (done face-to-face / online).	Encourage improvements in decent work, economic growth and quality education by providing opportunities for workers to learn sustainable finance so that it can be applied in business practice.	1. Improve worker competence. 2. Increase customer satisfaction.
6.	September 2022	Melakukan kegiatan edukasi kepada debitur segmen UKM dalam rangka turut menyukseskan Program Keuangan Berkelanjutan secara tatap muka/daring.	Mendorong perbaikan pada pekerjaan yang layak, pertumbuhan ekonomi, dan pendidikan berkualitas dengan memberikan kesempatan kepada masyarakat khususnya debitur dalam menambah pengetahuan terkait keuangan berkelanjutan.	1. Meningkatkan pemahaman debitur UKM mengenai keuangan berkelanjutan. 2. Meningkatkan kepuasan Nasabah.
	September 2022	Conduct educational activities for debtors of the SME segment in order to participate in the success of the face-to-face/online Sustainable Finance Program.	Encourage improvements in decent work, economic growth, and quality education by providing opportunities for the community, especially debtors, to increase knowledge related to sustainable finance.	1. Improve the understanding of SME debtors regarding sustainable finance. 2. Increase customer satisfaction.

No	Target Waktu Target Time	Uraian Aktivitas Activity Description	Tujuan Aktivitas Activity Purpose	Indikator Keberhasilan Success Indicator
7.	Desember 2022	Pelaksanaan Program Desa Digital dan kegiatan Edukasi Literasi Keuangan.	Memberantas kemiskinan dan kelaparan demi terciptanya kehidupan sehat dan sejahtera serta mendorong pembangunan kota dan komunitas yang berkelanjutan. Selain itu juga mendorong pendidikan berkualitas dengan memberikan kesempatan kepada masyarakat dalam menambah pengetahuan terkait literasi keuangan.	Pelaksanaan Program Desa Binaan dan kegiatan Edukasi Literasi Keuangan.
	December 2022	Implementation of the Digital Village Program and Financial Literacy Education activities.	Eradicate poverty and hunger for the creation of healthy and prosperous lives and promoting sustainable urban and community development. In addition, it also encourages quality education by providing opportunities for the community to increase knowledge related to financial literacy.	Implementation of the Assisted Village Program and Financial Literacy Education activities.
8.	Desember 2022	Menggalang budaya kerja pengurangan penggunaan kertas/plastik (<i>paper less/plastic less</i>), hemat Energi Listrik dan Bahan Bakar Minyak (BBM) untuk seluruh pekerja Bank Raya dalam rangka mendukung transformasi perilaku konsumen dan pengendalian polusi serta menerapkan kendaraan operasional bebas uji emisi.	Sebagai upaya dalam menangani perubahan iklim dan dampaknya dengan tujuan untuk menciptakan kehidupan sehat dan sejahtera.	1. Penggunaan Tumblr/gelas di setiap rapat & training. 2. Penurunan Penggunaan ATK. 3. Peningkatan utilitas agropos/email. 4. Penurunan Penggunaan Listrik (Kwh) dan penghematan air. 5. Penurunan Penggunaan Bahan Bakar Minyak (Liter). 6. Kendaraan operasional lolos uji emisi.
	December 2022	Promote a work culture of reducing the use of paper/plastic (<i>paper less/plastic less</i>), saving electricity and fuel oil (BBM) for all Bank Raya employees in order to support the transformation of consumer behavior and pollution control as well as implementing emission-free operational vehicles.	As an effort to deal with climate change and its impacts with the aim of creating a healthy and prosperous life.	1. Use of Tumblr/glass in every meeting & training. 2. Decrease in ATK Usage. 3. Improved agropos/ email utility. 4. Decrease in Electricity Usage (Kwh) and save water. 5. Decrease in the Use of Fuel Oil (Liters). 6. Operational vehicles pass emission tests.

No	Target Waktu Target Time	Uraian Aktivitas Activity Description	Tujuan Aktivitas Activity Purpose	Indikator Keberhasilan Success Indicator
9.	September 2022	Bekerjasama dengan tim Budaya Kerja untuk melakukan sosialisasi Keuangan berkelanjutan Bank Raya untuk meningkatkan <i>employee participation and engagement</i> .	Memperkenalkan penerapan program RAKB sehingga diharapkan dapat meningkatkan wawasan, <i>awareness</i> dan kapasitas pekerja untuk berinovasi terhadap pengembangan produk atau pun jasa.	1. Meningkatkan pemahaman debitur UKM mengenai keuangan berkelanjutan. 2. Meningkatkan kepuasan Nasabah.
	September 2022	Collaborate with the Work Culture team to disseminate Bank Raya sustainable finance to increase employee participation and engagement.	Introduce the implementation of the RAKB program so that it is expected to increase the insight, awareness and capacity of workers to innovate towards product or service development.	1. Improve the understanding of SME debtors regarding sustainable finance. 2. Increase customer satisfaction.
10.	November 2022	Melakukan evaluasi dan <i>update</i> kebijakan tentang Keuangan berkelanjutan yang telah disusun.	Mendukung program pemerintah untuk berkomitmen dalam mencapai tujuan pembangunan berkelanjutan dalam bentuk dibuatkannya kebijakan.	Tersusunnya kebijakan sebagai dasar pedoman pelaksanaan Keuangan berkelanjutan.
	November 2022	Evaluate and update policies on sustainable finance that have been prepared.	Support government programs to commit to achieving sustainable development goals in the form of making policies.	Formulation of policies as the basis for implementing sustainable finance guidelines.
11.	Desember 2022	Penyesuaian dan evaluasi kebijakan & prosedur di bidang Perkreditan dan penyesuaian kebijakan pada unit <i>Supporting</i> .	Mendukung program pemerintah untuk berkomitmen dalam mencapai tujuan pembangunan berkelanjutan dalam bentuk dibuatkannya kebijakan.	Telah dilakukannya penyesuaian kebijakan & prosedur di bidang Perkreditan dan penyesuaian kebijakan pada <i>unit supporting</i> .
	December 2022	Adjustment and evaluation of policies & procedures in the field of Credit and policy adjustments in the Supporting unit.	Support government programs to commit to achieving sustainable development goals in the form of making policies.	There have been adjustments to policies & procedures in the field of Credit and policy adjustments to supporting units.

Tata Kelola Keberlanjutan

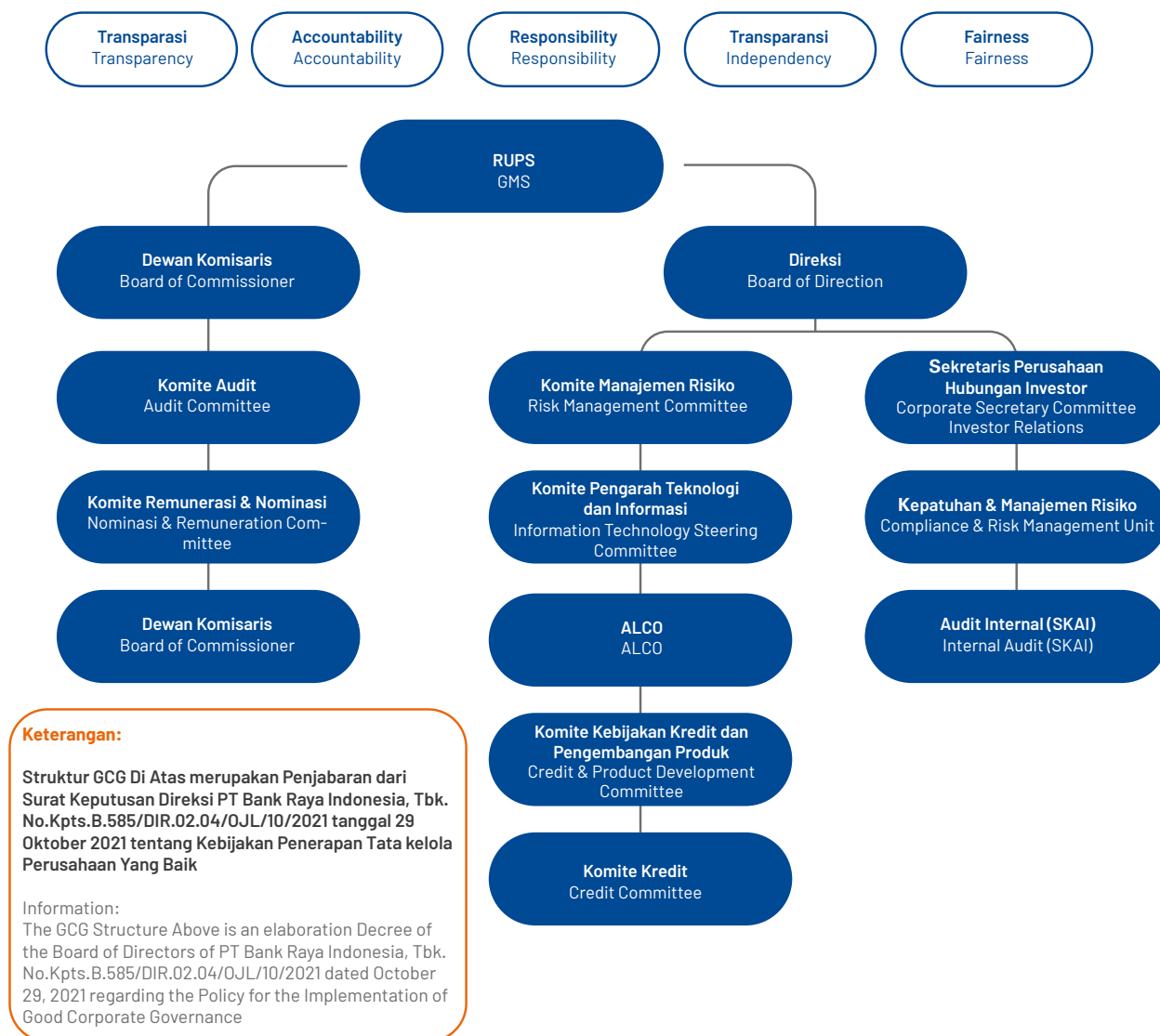
Sustainability Governance

Tata Kelola yang Baik (*Good Corporate Governance/GCG*) bagi Bank merupakan suatu tata cara pengelolaan Bank yang menerapkan prinsip-prinsip keterbukaan (*transparency*), akuntabilitas (*accountability*), pertanggungjawaban (*responsibility*), independensi (*independency*), dan kewajaran (*fairness*). Selain itu, GCG merupakan prinsip-prinsip yang mendasari suatu proses dan mekanisme pengelolaan perusahaan berlandaskan peraturan perundang-undangan dan etika berusaha.

Struktur tata kelola perusahaan Bank Raya sebagaimana ditetapkan dalam Surat Keputusan Direksi PT Bank Raya Indonesia, Tbk.No. Kpts.B.585/DIR.02.04/OJL/10/2021 tanggal 29 Oktober 2021 tentang Kebijakan Penerapan Tata kelola Perusahaan Yang Baik, adalah sebagai berikut: [GRI 102-18]

GCG for the Bank is a management technique that adheres to the ideals of openness, accountability, responsibility, independence, and justice. Additionally, GCG refers to the concepts that underpin a company's management process and mechanism, which are governed by applicable laws and regulations, as well as corporate ethics.

Bank Raya's corporate governance structure is as follows, as specified in the Decree of the Board of Directors of PT. Bank Raya Indonesia, Tbk.No.Kpts.B.585/DIR.02.04/OJL/10/2021 dated October 29, 2021 regarding the Policy for the Implementation of Good Corporate Governance: [GRI 102-18]



Sesuai dengan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas, organ perusahaan terdiri dari Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris dan Direksi. Dewan Komisaris dan Direksi, yang memiliki wewenang dan tanggung jawab yang jelas sesuai fungsinya masing-masing sebagaimana diamanatkan dalam Anggaran Dasar dan peraturan perundang-undangan yang berlaku. [GRI 102-22]

1. RUPS
adalah organ perusahaan yang mempunyai wewenang yang tidak diberikan kepada Direksi atau Dewan Komisaris dalam batas yang ditentukan dalam Undang-Undang dan/ atau Anggaran dasar. [GRI 102-23]
2. Dewan Komisaris
adalah organ perusahaan yang bertugas melakukan pengawasan secara umum dan/atau khusus sesuai dengan Anggaran dasar serta memberi nasihat kepada Direksi.
3. Direksi
adalah organ perusahaan yang berwenang dan bertanggung jawab penuh atas pengurusan Bank untuk kepentingan Bank, sesuai dengan maksud dan tujuan Bank serta mewakili Bank, sesuai dengan ketentuan Anggaran dasar.

The General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors are the company's organs, as defined by Law No. 40 of 2007 on Limited Liability Companies. The Board of Commissioners and the Board of Directors, each of which has distinct jurisdiction and duty in accordance with the Articles of Association and relevant laws and regulations. [GRI 102-22]

1. GMS
GMS is a corporate organ that has jurisdiction not delegated to the Board of Directors or the Board of Commissioners, subject to the limitations set out in the Act and/or the Articles of Association. [GRI 102-23]
2. Board of Commissioners
The Board of Commissioners is a corporate body charged with the responsibility of general and/or particular oversight in line with the Articles of Association and advising the Board of Directors.
3. Board of Directors
The Board of Directors is a corporate body that is empowered and totally accountable for administering the Bank for the benefit of the Bank, in line with the Bank's purposes and goals, and for representing the Bank in accordance with the Articles of Association.

Penanggung Jawab Penerapan Keuangan Berkelanjutan [E.1] Responsible for the Implementation of Sustainable Finance [E.1]

Sebagai Bank Kategori BUKU II, Bank Raya berkomitmen untuk menerapkan keuangan berkelanjutan sebagaimana diatur dalam Peraturan OJK No.51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten dan Perusahaan Publik.

Penerapan keuangan berkelanjutan di Bank Raya secara umum menjadi tanggung jawab Direktur Utama sebagai pemimpin tertinggi di Bank Raya. Namun, dalam pelaksanaannya, Direktur Utama telah menugaskan Direktur *Enterprise Risk, Compliance & Human Resource* yang membawahi *Desk Enterprise Risk Management* sebagai kepala Unit Kerja yang bertugas melakukan penyusunan, *monitoring*, dan penyampaian atas penerapan keuangan berkelanjutan. [GRI 102-19].

Dalam rangka penyusunan Rencana Aksi Keuangan Berkelanjutan (RAKB) dan penyampaian hasil pelaksanaan atas Rencana Aksi Keuangan Berkelanjutan (RAKB) dalam bentuk Laporan Berkelanjutan dilakukan oleh Bagian *Enterprise Risk & Portfolio Management-Desk Enterprise Risk Management* sebagai Koordinator Tim Khusus Keuangan Berkelanjutan.

Bank Raya, as a TIER II Category Bank, is committed to implementing sustainable finance in accordance with OJK Regulation No.51/POJK.03/2017 on Sustainable Finance for Financial Service Institutions, Issuers, and Public Companies.

The President Director, as Bank Raya's highest officer, is generally responsible for implementing sustainable finance. In practise, however, the President Director has designated the Director of Enterprise Risk, Compliance, and Human Resources, who manages the Enterprise Risk Management Desk, as the head of the Work Unit charged with planning, monitoring, and implementing sustainable financing. [GRI 102-19]

The Enterprise Risk & Portfolio Management Division – Enterprise Risk Management Desk is responsible for preparing the Sustainable Finance Action Plan (RAKB) and delivering the outcomes of its implementation in the form of a Sustainability Report.

Adapun tugas dan tanggung jawab Tim Khusus Keuangan Berkelanjutan sebagai berikut:

Ketua (Direktur Enterprise Risk, Compliance & Human Resource):

1. Memastikan bahwa Tim Khusus Keuangan Berkelanjutan dan Unit Kerja Pengelola telah melaksanakan Keuangan Berkelanjutan sesuai dengan ketentuan yang berlaku;
2. Bersama-sama dengan Tim Khusus Keuangan Berkelanjutan merekomendasikan hasil penyusunan Rencana Aksi Keuangan Berkelanjutan (RAKB) dan hasil pemantauan Keuangan Berkelanjutan kepada Direksi sebelum disetujui oleh Dewan Komisaris.

Koordinator (Desk Enterprise Risk Management):

1. Melakukan koordinasi dengan Ketua Tim Khusus Keuangan Berkelanjutan dan seluruh anggota Tim Khusus Keuangan Berkelanjutan serta Unit Kerja terkait hal-hal sebagai berikut:
 - Penyusunan Rencana Aksi Keuangan Berkelanjutan (RAKB);
 - Pemantauan penerapan Keuangan Berkelanjutan; dan
 - Penyusunan Laporan Berkelanjutan;
2. Menyampaikan hasil pelaksanaan seluruh tugas dan tanggung jawab tersebut pada butir (i) di atas kepada Ketua Tim, Direksi dan Dewan Komisaris untuk mendapat persetujuan;
3. Menyampaikan Rencana Aksi Keuangan Berkelanjutan (RAKB) dan Laporan Berkelanjutan sebelum batas akhir penyampaian sebagaimana ditetapkan oleh ketentuan yang berlaku kepada Otoritas Jasa Keuangan.

Berikut merupakan bagan struktur organisasi unit yang bertanggung jawab terhadap penerapan keuangan berkelanjutan.

The Special Team for Sustainable Finance has the following mandates and responsibilities:

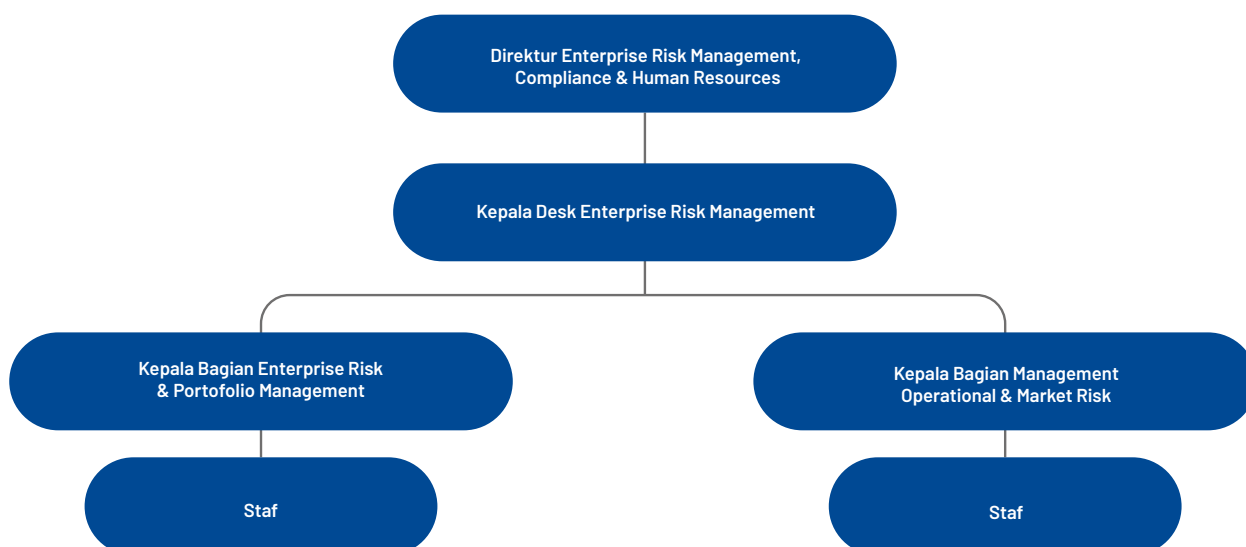
Chairman (Director of Enterprise Risk, Compliance, and Human Resources):

1. Ensure that the Special Team for Sustainable Finance and the Management Work Unit adhere to applicable legislation when implementing Sustainable Finance;
2. Prior to approval by the Board of Commissioners, recommend to the Board of Directors the outcomes of the Sustainable Finance Action Plan (RAKB) and the Sustainable Finance monitoring to the Board of Directors, in collaboration with the Special Team for Sustainable Finance.

Co-ordinator (Enterprise Risk Management Desk):

1. Coordinate the following activities with the Head of the Special Team for Sustainable Finance and all members of the Special Team for Sustainable Finance and the Work Unit:
 - Development of the Regional Action Plan for Sustainable Finance (RAKB);
 - Observation of the Sustainable Finance Initiative's implementation; and
 - Reporting on Sustainability;
2. Submit the outcomes of the execution of all of the above-mentioned activities and obligations to the Team Leader, the Board of Directors, and the Board of Commissioners for approval;
3. Submit the Sustainable Finance Action Plan (RAKB) and Sustainability Report to the Financial Services Authority by the deadline specified by applicable legislation.

The chart below illustrates the organisational structure of the units charged with implementing sustainable financing.



Pengembangan Kompetensi Terkait Keuangan Berkelanjutan [E.2] Competency Development Related to Sustainable Finance [E.2]

Bank Raya melalui *Desk Enterprise Risk Management* telah melakukan beberapa kegiatan untuk memberikan pemahaman dan pengetahuan tentang keuangan berkelanjutan kepada seluruh Divisi atau *Desk* terkait di Kantor Pusat dan Kantor Cabang/Kantor Cabang Pembantu Bank Raya. Kegiatan tersebut berupa:

1. Pendidikan *Sustainable Finance Awareness Batch 1* pada tanggal 5 – 6 Juli 2021 yang diikuti oleh 35 orang karyawan *Account Officer* yang diselenggarakan secara daring (*online*) bekerjasama dengan Lembaga Pengembangan Perbankan Indonesia (LPPI) dengan narasumber praktisi perbankan.
2. Pendidikan *Sustainable Finance Awareness* pada tanggal 23 November – 7 Desember (7 kali pertemuan) yang diikuti oleh 30 orang *Funding Officer* yang diselenggarakan secara daring (*online*) bekerjasama dengan Lembaga Pengembangan Perbankan Indonesia (LPPI) dengan narasumber praktisi perbankan.
3. *Desk Enterprise Risk Management* – Bagian *Enterprise Risk & Portfolio Management* (EPM) telah melaksanakan *E Learning* terkait RAKB tanggal 27 – 28 Oktober 2021 dengan total 630 peserta dari total 866 pekerja (73,67%). *E Learning* ini dilakukan secara mandiri dengan tahapan mengisi *pre test*, belajar bahan materi, dan mengisi *post test* dengan menggunakan media *google forms*.
4. *Desk Enterprise Risk Management* – Bagian *Enterprise Risk & Portfolio Management* (EPM) telah mengadakan rapat video conference dengan seluruh Divisi/*Desk* pada tanggal 7 September 2021 dan 2 November 2021 terkait Rencana Aksi Keuangan Berkelanjutan (RAKB) tahun 2022-2026.

Bank Raya's Enterprise Risk Management Desk has conducted a number of programmes to increase awareness and understanding of sustainable finance among all relevant Divisions or Desks at the Head Office and Branch/Sub-Branch Offices of Bank Raya. These activities include the following:

1. On 5 – 6 July 2021, 35 Account Officer personnel attended the first batch of Sustainable Finance Awareness Education, which was offered online in partnership with the Indonesian Banking Development Institute (LPPI) and included banking practitioners as resource people.
2. Sustainable Finance Awareness Education was presented online from November 23 to December 7 in partnership with the Indonesian Banking Development Institute (LPPI) and included banking practitioners as resource people. It was attended by 30 Funding Officers.
3. Enterprise Risk Management – Enterprise Risk & Portfolio Management (EPM) conducted eLearning on RAKB on October 27 – 28, 2021, with a total of 630 participants from a total of 866 employees (73.67%). This e-Learning is conducted individually, with phases consisting of completing the pre-test, reviewing the learning materials, and completing the post-test utilising Google Forms media.
4. Desk Enterprise Risk Management – On 7 September and 2 November 2021, Enterprise Risk & Portfolio Management (EPM) had a video conference meeting with all Divisions/Desks to discuss the Sustainable Finance Action Plan (RAKB) for 2022–2026.

Penilaian Risiko Atas Penerapan Keuangan Berkelanjutan [E.3] Risk Assessment on the Implementation of Sustainable Finance [E.3]

Bank Raya telah menetapkan sistem *monitoring* dan evaluasi terhadap setiap program yang ditetapkan dalam RAKB yang disusun Bank. Metode *monitoring* dan evaluasi dilakukan oleh *Desk Enterprise Risk Management Bagian Enterprise Risk & Portfolio Management* sebagai Koordinator Tim Khusus Keuangan Berkelanjutan. Sistem *monitoring* program dilakukan secara berkala melalui kegiatan surat menyurat melalui agropos dan mengadakan *online meeting* dengan Divisi terkait untuk membahas *progress* dan pencapaian program RAKB untuk selanjutnya dilakukan evaluasi dan penyempurnaan. Hasil *monitoring* tersebut akan disampaikan kepada Dewan Komisaris dan Direksi untuk dilakukan evaluasi dan penyesuaian apabila ditemukan kendala serta menetapkan mitigasi risiko dengan cara menerapkan langkah-langkah proses manajemen risiko yaitu identifikasi, pengukuran, pemantauan dan pengendalian sesuai karakteristik RAKB tersebut.

Bank Raya has built a framework for monitoring and evaluating each initiative outlined in the Bank's RAKB. The Enterprise Risk Management Desk, as Coordinator of the Special Team for Sustainable Finance, is responsible for monitoring and evaluating the method. The programme monitoring mechanism is conducted on a periodic basis through email with agropos and online meetings with associated divisions to review the RAKB program's status and accomplishments for future evaluation and development. The monitoring results will be presented to the Board of Commissioners and the Board of Directors for evaluation and adjustment if obstacles are discovered, as well as to determine risk mitigation through the implementation of risk management process steps, specifically identification, measurement, monitoring, and control, in accordance with the RAKB's characteristics.

Oleh karena itu sistem *monitoring*, evaluasi, dan mitigasi dalam penerapan keuangan berkelanjutan merupakan kekuatan Bank Raya yang dapat mendukung prinsip-prinsip sebagai berikut:

- **Prinsip Pengelolaan Risiko Sosial dan Lingkungan Hidup**
Bank menerapkan prinsip kehati-hatian dalam mengukur risiko yang dikelola dalam sistem manajemen risiko perusahaan, mencakup dampak sosial dan lingkungan hidup yang bersifat negatif dari proyek atau kegiatan yang dibiayai.
- **Prinsip Tata Kelola**
Bank menerapkan prinsip tata kelola keberlanjutan (ekonomi, lingkungan dan sosial) melalui manajemen dan kegiatan operasional bisnis.
- **Prinsip Inklusif**
Bank menjamin ketersediaan dan keterjangkauan produk dan/atau jasa yang dapat dengan mudah diakses oleh konsumen kami. Bahkan kami menyediakan penerapan praktik keuangan berkelanjutan yang inklusif yang menjangkau masyarakat luas.
- **Prinsip Koordinasi dan Kolaborasi**
Bank aktif dalam forum/kegiatan/kerja sama terkait Bisnis Berkelanjutan, baik dalam tingkat regional/nasional/lokal, dalam rangka penyelarasan strategi keberlanjutan perusahaan.

As a result, Bank Raya's monitoring system, evaluation, and mitigation capabilities in the use of sustainable financing enable it to support the following principles:

- **Principles of Social and Environmental Risk Management**
The Bank employs the precautionary principle while assessing risks controlled through the company's risk management system, which may include negative social and environmental consequences of projects or activities sponsored.
- **Principles of Governance**
The Bank's management and commercial activities are guided by the concepts of sustainable governance (economic, environmental, and social).
- **Principle of Inclusiveness**
The Bank ensures the accessibility and affordability of products and/or services that our consumers can readily access. Indeed, we facilitate the adoption of inclusive sustainable financial methods that benefit the entire community.
- **Coordination and Collaboration Principles**
The Bank participates in forums/activities/collaborations on Sustainable Business at the regional, national, and local levels, with the goal of aligning the company's sustainability strategy.

Permasalahan Penerapan Keuangan Berkelanjutan [E.5] Issues with the Implementation of Sustainable Finance [E.5]

Dikarenakan pandemik Covid - 19 maka beberapa program RAKB seperti pelaksanaan edukasi literasi keuangan, *training*, dan pembangunan *smart village* menjadi terbatas. Selain itu yang menjadi tantangan lainnya adalah meningkatkan *awareness* secara terus-menerus kepada seluruh pekerja tentang pentingnya budaya sadar sosial dan lingkungan.

Due to the Covid-19 epidemic, various RAKB activities have been impacted, including the introduction of financial literacy education and training, as well as the construction of smart communities. Additionally, another task is to continually educate all employees on the value of a socially and ecologically responsible culture.

Kinerja Ekonomi Keberlanjutan

Sustainable Economic Performance

Bahasan lengkap terkait kinerja ekonomi Bank Raya dapat dilihat pada bagian Analisa dan Pembahasan Manajemen pada Laporan ini.

The Management Evaluation and Analysis portion of this Report contains a detailed discussion of Bank Raya's economic performance.

Kinerja Ekonomi Bank Raya

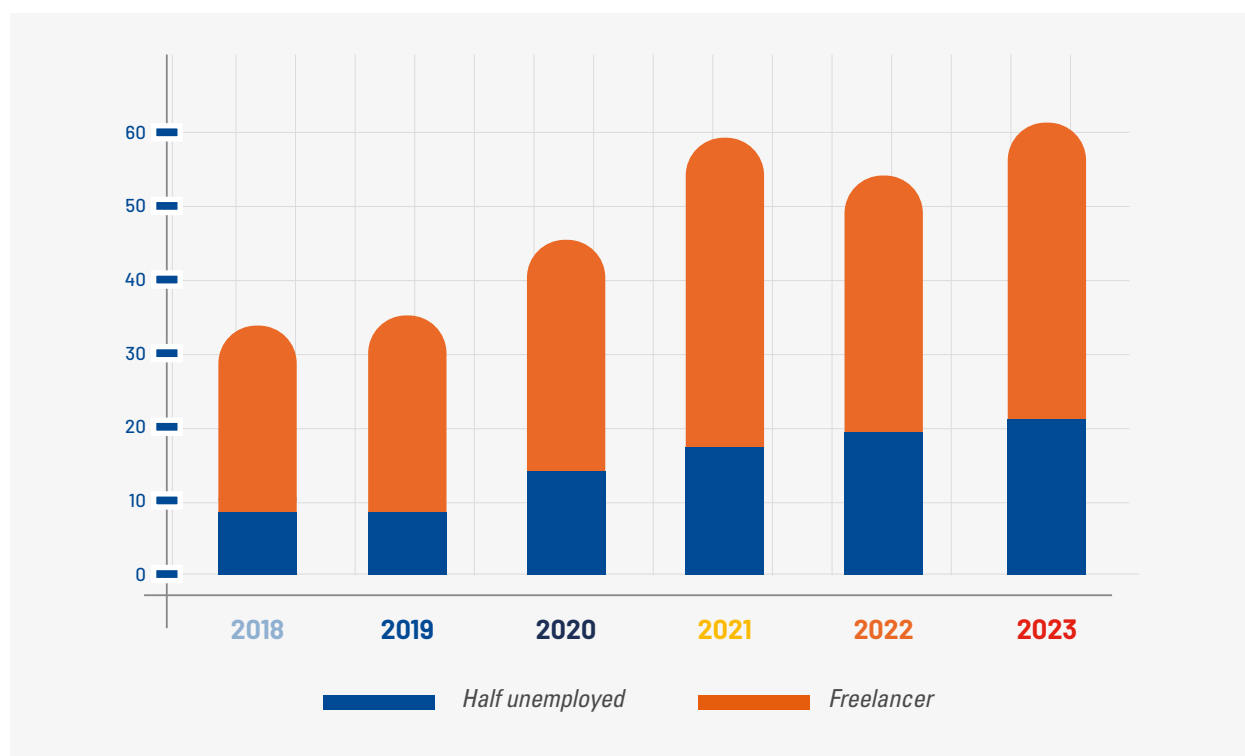
Economic Performance of Bank Raya

Pandemi Covid-19 yang masih belum berakhir dan perekonomian yang belum sepenuhnya pulih menjadi tantangan utama yang dihadapi Bank Raya di tahun 2021. Kedua faktor tersebut memberikan pengaruh yang sangat besar terhadap kinerja Bank, baik kinerja operasional maupun kinerja keuangan. Selain itu, konsolidasi internal seiring dengan perubahan nama dan model bisnis Bank juga menjadi tantangan tersendiri yang dihadapi Bank di tahun 2021. [GRI 103-1]

The ongoing Covid-19 outbreak and the economy's slow recovery are the primary issues for Bank Raya in 2021. These two aspects have a significant impact on the Bank's performance, both operational and financial. Additionally, internal consolidation, as well as changes to the Bank's brand and business strategy, will be a difficulty in 2021. [GRI 103-1]

Di tengah kondisi tersebut, Bank Raya tetap fokus dalam menjalankan kegiatan usahanya sebagai lembaga intermediasi. Tahun 2021, Bank mengubah fokus dalam penyaluran kredit dengan membidik segmen *gig economy* yang selama ini belum banyak di garap oleh pemain lain. Bank Raya melihat setiap tahun, pelaku *gig economy* terus berkembang di Indonesia. Industri ini terus berkembang, dan diperkirakan akan mencapai 74.8 juta orang di 2025.

Bank Raya stays focused on its commercial operations as an intermediate institution in the face of these circumstances. In 2021, the Bank will refocus its lending efforts by focusing on the gig economy area, which has received little attention from other participants. Bank Raya observes that Indonesia's gig economy participants continue to increase year after year. The sector is predicted to continue growing, reaching 74.8 million people in 2025.



Perubahan model bisnis dan target pasar yang dilakukan Bank Raya tahun 2021 berimplikasi pada kinerja Bank di tahun 2021. Bank Raya sangat menyadari, tahun 2021 akan menjadi tahun yang sangat menantang. Proses konsolidasi yang dilakukan Bank tidak akan langsung memberikan hasil yang optimal. Karena itu, Bank menjadikan tahun 2021 sebagai tahun konsolidasi dan transisi.

Wujud dari kesadaran Bank akan hal tersebut tertuang dalam Rencana Bisnis Bank (RBB) tahun 2021, dimana sebagian besar target yang ditetapkan lebih rendah dari pencapaian tahun sebelumnya.

Dengan visi baru "*The Best Digital Bank by Becoming House of Fintech & Home for Gig Economy*", Bank Raya telah menetapkan arah kebijakan strategis Bank, yaitu: [GRI 103-2]

1. Melakukan pengembangan dan penyaluran produk pinjaman (*digital lending*) Pinang Mikro dan Pinang Retail dengan target pasar yaitu *ecosystem* bisnis mikro dengan plafond sampai dengan Rp100 juta (Pinang Mikro) dan bisnis ritel dengan plafon lebih dari Rp100 juta sampai dengan Rp1 miliar (Pinang Retail).
2. Penyaluran produk pinjaman Digital Konsumer (Pinang Konsumer) dengan target pasar *captive market* (nasabah BRI & Bank Raya) dengan maksimal plafond Rp25 juta dengan maksimal jangka waktu 18 Bulan.
3. Penyaluran pinjaman *channeling* melalui *fintech* (*P2P Lending*) sebagai *entry gateway* kerjasama Bank Raya dengan *fintech* (Pinang Connect).
4. Pemasaran produk simpanan *digital saving* dengan pemanfaatan aplikasi untuk B2C dan B2B2C serta *bundling* dengan produk pinjaman *digital lending*.
5. *Beyond banking* yakni layanan yang diberikan Bank Raya kepada nasabah yakni *beyond services* (layanan asuransi dalam rangka mendukung kegiatan usaha nasabah) dan *beyond solution* dengan menjadi *aggregator* atau penghubung antara kebutuhan *merchant* dan *supplier* sehingga menjadi sebuah *ecosystem* bisnis yang dapat terus di *leverage* oleh Bank Raya.
6. Pemasaran produk *e-channel* dan bekerja sama dengan BRI (Induk) dalam upaya menyediakan layanan perbankan yang handal dan efisien.
7. Pemasaran produk digital dengan pola kerjasama (*partnership* dengan pihak ketiga), dalam upaya memperluas cakupan akuisisi nasabah dan memanfaatkan *traffic* dan *ecosystem user* pihak ketiga khususnya pelaku *ecosystem player*, *startup* dan *fintech*.
8. Implementasi *underwriting process* produk *digital lending* secara *digital (end-to-end)* melalui dukungan *credit scoring engine* dan *data analytics*.
9. Implementasi *Strategic Business Unit* (SBU) yang fokus dalam pengembangan & pemasaran produk digital Bank Raya, serta upaya melakukan akselerasi dalam rangka membangun *digital internal capability* talent SDM melalui hiring *digital talent*, *re-train* dan *re-skill existing talent* Bank Raya.

Bank Raya's business strategy and target market changes in 2021 will have an effect on the bank's performance in 2021. Bank Raya is well aware that the year 2021 would be quite difficult. The Bank's consolidation procedure will not provide excellent outcomes immediately. As a result, the Bank designates the year 2021 as a year of consolidation and change.

The Bank's understanding of this is shown in the Bank's Business Plan (RBB) for 2021, where the majority of objectives are set lower than the previous year's successes.

Bank Raya's strategic policy orientation has been defined by its new goal of "*The Best Digital Bank by Becoming a House of Fintech & Home for the Gig Economy*." [GRI 103-2]

1. Developing and distributing Pinang Mikro and Pinang Retail loan products (*digital lending*) with a target market of micro businesses with a ceiling of up to IDR100 million (Pinang Mikro) and retail businesses with a ceiling of more than IDR100 million and up to IDR1 billion (Pinang Micro) retail).
2. Distribution of consumer digital loan products (Pinang Konsumer) to a captive market (BRI & Bank Raya clients) with a maximum loan amount of IDR25 million and a maximum repayment duration of 18 months.
3. Loan distribution through fintech (P2P Lending) serves as the entrance point for Bank Raya's engagement with fintech (Pinang Connect).
4. Digital saving products are marketed via the use of B2C and B2B2C apps, as well as by bundling with digital lending loan products.
5. Beyond banking, specifically the services provided by Bank Raya to customers, specifically beyond services (insurance to support customers' business activities) and beyond solutions by acting as an aggregator or liaison between merchants' and suppliers' needs, thereby creating a business ecosystem that Bank Raya can continuously leverage.
6. Marketing e-commerce items and cooperating with BRI (Parent) to deliver dependable and efficient banking services.
7. Collaboration-based marketing of digital goods in order to broaden the reach of client acquisition and use third-party traffic and ecosystem users, particularly ecosystem participants, startups, and fintech actors.
8. Implementation of an end-to-end digital underwriting process for digital lending products using a credit scoring engine and data analytics.
9. Implementation of the Strategic Business Unit (SBU) focused on developing and marketing Bank Raya's digital products, as well as efforts to accelerate efforts to build digital internal capability for human resources talent through hiring digital talent, retraining and reskilling existing Bank Raya talent.

10. Implementasi teknologi dan infrastruktur terkini (Open API, Big Data, Cloud, dll) dalam upaya mendukung *value proposition Bank Raya*.
11. Pelaksanaan inisiatif *revamp existing portfolio* dan bisnis Bank Raya. Inisiatif tersebut meliputi *customer and portfolio*, SDM, dan Unit Kerja.
12. Penyaluran kredit program subsidi Pemerintah (KUR & KPRS) sesuai dengan komitmen Bank kepada Pemerintah.

Implementasi berbagai kebijakan strategis tersebut membawa hasil dengan tercapainya target-target yang ditetapkan Bank Raya dalam Rencana Bisnis Bank (RBB) tahun 2021, sebagaimana tabel berikut: [GRI 103-3][F.2]

10. Implementation of cutting-edge technology and infrastructure (Open APIs, Big Data, and Cloud, among others) to bolster Bank Raya's value offering.
11. Implementation of the project to restructure Bank Raya's current portfolio and operations. Customers and portfolios, human resources, and work units are all included in these projects.
12. Credit for government subvention programmes (KUR & KPRS) is distributed in line with the Bank's obligation to the Government.

The adoption of these numerous strategic initiatives resulted in the attainment of Bank Raya's 2021 Business Plan (RBB) goals, as seen in the accompanying table.: [GRI 103-3][F.2]

dalam jutaan Rupiah/in million Rupiah

Uraian Description	2021			2020			2019		
	Target Target	Realisasi Realisation	Pencapaian Achievement	Target Target	Realisasi Realisation	Pencapaian Achievement	Target Target	Realisasi Realisation	Pencapaian Achievement
Total Aset Total Assets	16.358.720	16.866.523	103,10%	26.325.384	28.015.492	106,42%	26.746.565	27.067.923	101,20%
Dana Pihak Ketiga Third-Party Funds	13.704.141	13.496.292	98,48%	21.682.630	22.995.279	106,05%	21.325.323	21.144.601	99,15%
Kredit yang Diberikan Credits Granted	12.607.811	11.608.327	92,07%	19.948.140	19.491.934	97,71%	19.623.108	19.366.245	98,69%
Pendapatan Bunga Bersih Net Interest Income	719.114	873.569	121,48%	596.213	624.636	104,77%		693.211	
Pendapatan Fee Based Fee Based Income	12.741	21.580	169,38%	16.970	17.978	105,94%		16.476	
Laba (Rugi) Bersih Net Profit (Loss)	(3.320.297)	(3.045.701)	109,02%	31.236	31.261	100,08%	50.904	51.061	100,31%

Kinerja Bank Raya tahun 2021 secara umum berhasil melampaui target yang ditetapkan pada RBB 2021. Namun demikian, pada beberapa indikator kinerja Bank masih berada di bawah target RBB, salah satunya adalah dalam hal penyaluran kredit. Tahun 2021, Bank Raya menyalurkan kredit sebesar Rp11.608,33 miliar, pencapaian tersebut setara dengan 92,07% dari target RBB sebesar Rp12.607,81 miliar, hal tersebut dikarenakan Bank masih berada dalam tahap transisi dari penyaluran kredit secara konvensional menjadi secara digital.

In general, Bank Raya's performance in 2021 exceeded the aim stated in the 2021 RBB. However, the Bank's performance on various measures remained below the RBB aim, one of which was lending. Bank Raya issued loans of IDR 11,608.33 billion in 2021, accounting for 92.07% of the RBB objective of IDR 12,607.81 billion. This performance is due to the Bank's continued shift from conventional lending to conventional lending digital.

Portofolio Kredit [F.3] Loans Portofolio [F.3]

Bank Raya menyediakan dana bagi masyarakat dan korporasi dalam bentuk kredit. Pembiayaan diperuntukkan bagi masyarakat kecil dan menengah sementara kredit diperuntukkan bagi masyarakat dan korporasi. Nilai pembiayaan yang disalurkan sepanjang tahun 2021 mencapai sebesar Rp11.608,32 miliar, turun 40,45% dibandingkan tahun 2020, yang mencapai sebesar Rp19.491,93 miliar. Namun demikian, Bank tetap konsisten untuk memberikan pembiayaan kepada sektor dan bidang usaha yang tergolong dalam usaha berkelanjutan.

Adapun pencapaian target pembiayaan terhadap sektor usaha berkelanjutan dalam 3 tahun terakhir adalah sebagai berikut:

Bank Raya offers financing to individuals and businesses. Financing is targeted at small and medium-sized communities, while credit is targeted at both communities and businesses. The total amount of finance issued in 2021 was IDR 11.608,32 billion, down 40.45% from IDR 19,491.93 billion in 2020. However, the Bank continues to lend to industries and economic domains deemed as sustainable.

The following table summarises the financial objectives for the sustainable business sector during the previous three years:

dalam jutaan Rupiah/in million Rupiah

Uraian Description	2021		2020		2019	
	%	Nominal	%	Nominal	%	Realisasi Realisation
Energi Terbarukan Renewable Energy	3,99%	462.702	1,68%	327.495	2,98%	577.174
Pengelolaan Sumber Daya Alam Hayati dan Penggunaan Lahan yang Berkelanjutan Management of Biological Resources and Sustainable Land Use	10,00%	1.722.540	12,41%	2.419.315	9,66%	1.871.013
Bangunan Berwawasan Lingkungan yang Memenuhi Standar atau Sertifikasi yang Diakui Secara Nasional, Regional, atau Internasional Environmentally Friendly Buildings That Meet Nationally, Regionally, or Internationally Recognised Standards or Certifications	0,70%	81.071	0,16%	30.305	-	-
Total		2.266.314		2.777.116		2.448.187
Total Kredit Total Credit	19,52%	11.608.327	14,25%	19.491.933	12,64%	19.366.245

Tahun 2021, jumlah kredit yang diberikan Bank Raya untuk sektor industri yang terkait dengan keberlanjutan mencapai Rp2.266.314 juta, setara dengan 19,52% dari total kredit Bank.

By 2021, Bank Raya's loans to sustainable industrial sectors would equal Rp2,266.314 million, or 19.52 percent of the bank's total loans.

Distribusi Nilai Ekonomi Economic Value Distribution

Dengan pencapaian kinerja tersebut di atas, maka distribusi nilai ekonomi Bank Raya, yaitu nilai ekonomi langsung yang dihasilkan, nilai ekonomi yang didistribusikan, dan nilai ekonomi yang ditahan, dapat dipetakan. Nilai ekonomi langsung yang dihasilkan adalah sejumlah pendapatan yang diperoleh dari hasil kegiatan bisnis Bank. Sedangkan nilai ekonomi yang didistribusikan merupakan sejumlah pengeluaran yang didistribusikan sebagai bentuk kontribusi Bank dalam meningkatkan laju pertumbuhan ekonomi dan kesejahteraan

The attainment of the aforementioned performance enables the distribution of Bank Raya's economic value to be mapped, namely the direct economic value created, the dispersed economic value, and the retained economic value. The direct economic value created is the revenue earned by the Bank's commercial activity. Meanwhile, distributed economic value refers to a variety of expenditures made by the Bank to contribute to the acceleration of economic growth and the welfare of stakeholders, such as salary, tax, dividend, and

para pemangku kepentingan, seperti pembayaran gaji, pajak, dividen, pembayaran untuk pemasok, maupun realisasi dana untuk masyarakat sebagai salah satu bentuk perwujudan Tanggung Jawab Sosial dan Lingkungan (TJSL), yang diimplementasikan melalui berbagai Program Tanggung Jawab Sosial Perusahaan (*Corporate Social Responsibility/CSR*). Adapun nilai ekonomi yang ditahan adalah selisih antara nilai ekonomi yang dihasilkan dikurangi dengan nilai ekonomi yang didistribusikan, yang digunakan untuk melanjutkan dan mengembangkan usaha Bank Jatim. [GRI 103-3, GRI 201-1]

supplier payments, as well as the realisation of funds for the community as an embodiment of social responsibility. and Environment (TJSL), which is implemented through a variety of Corporate Social Responsibility (CSR) initiatives. The retained economic value is the difference between the resultant economic value and the dispersed economic value, and it is utilised to sustain and expand Bank Jatim's operations.. [GRI 103-3, GRI 201-1]

Inklusi Keuangan Financial Inclusion

Peningkatan inklusi keuangan semakin mendesak mendorong Bank Raya mendukung penuh upaya pemerintah yang menerbitkan Pemerintah menerbitkan Peraturan Presiden Nomor 114 Tahun 2020 tentang Strategi Nasional Keuangan Inklusif (SNKI), yang menargetkan indeks inklusi keuangan pada 2024 tercapai sebesar 90%. Upaya tersebut patut didukung karena selain merupakan potensi pasar baru bagi perbankan, peningkatan inklusi keuangan juga efektif untuk mengurangi tingkat kemiskinan dan mempersempit kesenjangan bagi masyarakat yang tidak bisa mengakses layanan keuangan.

Financial inclusion is becoming more important to persuade Bank Raya to fully support the government's efforts to publish Presidential Regulation No. 114 of 2020 concerning the National Strategy for Financial Inclusion (SNKI), which sets a goal of 90% financial inclusion by 2024. These initiatives should be bolstered since, in addition to providing a possible new market for banks, growing financial inclusion also helps to alleviate poverty and close the gap for those who cannot access financial services.

Pada Tahun 2021 Bank Raya melaksanakan kegiatan Pinang Raya Event yang bertujuan untuk meningkatkan literasi keuangan digital bagi masyarakat sehingga, masyarakat mendapatkan pengetahuan dan akses terkait simpanan dan pinjaman digital.

In 2021, Bank Raya will host the Pinang Raya Event, which seeks to increase the community's digital financial literacy by providing information and access to digital savings and loans.

Berikut Agenda Pinang Raya Event yang telah dilaksanakan Bank Raya:

The following is the agenda for the Pinang Raya events organised by Bank Raya:

Nama Kegiatan/Program Name of Activity/Program	Waktu Pelaksanaan Date
Pinang Raya KC Medan Pinang Raya Medan Branch Office	19 October 2021
Pinang Raya KC Pekanbaru Pinang Raya Pekanbaru Branch Office	19 October 2021
Pinang Raya KC Surabaya Pinang Raya Surabaya Branch Office	21 - 22 October 2021
Pinang Raya KC Solo Pinang Raya Solo Branch Office	23 October 2021
Pinang Raya KCU Lebak Pinang Raya Lebak Main Branch Office	25 October 2021
Pinang Raya KC Palembang Pinang Raya Palembang Branch Office	29 October 2021
Pinang Raya KC Semarang Banyumanik Pinang Raya Semarang Banyumanik Branch Office	31 October 2021

Rasio Upah Karyawan Menurut Gender Terhadap Upah Minimum Regional/ Propinsi [GRI 202-1] Ratio of Employee Wages by Gender to Regional/Provincial Minimum Wages [GRI 202-1]

Bank Raya berkomitmen memenuhi kesejahteraan para karyawan. Kebijakan remunerasi dan benefit bagi karyawan, yang disesuaikan dengan ketentuan perundang-undangan, termasuk ketentuan Upah Minimum Provinsi (UMP). Penyesuaian gaji berkala kepada seluruh pegawai tetap berdasarkan kinerja dan dilakukan penyesuaian gaji bagi tenaga kontrak dan calon pegawai menyesuaikan dengan upah minimum regional (UMR).

Bank Raya mendasarkan kebijakan remunerasi pada Pengukuran keberhasilan kinerja dari hasil kerja kolektif yang tercermin dalam satu kesatuan pada pencapaian/realisasi atas Rencana Bisnis Bank (RBB) secara tahunan dan Kebijakan Direksi.

Kebijakan remunerasi didasarkan pada kompetensi, pengalaman, dan kinerja pegawai. Semakin baik kinerja, kompetensi, prestasi, serta tanggung jawab yang diemban oleh pegawai, maka semakin tinggi pula kompensasi serta tunjangan yang akan diterima.

Kebijakan remunerasi Bank Raya, termasuk paket remunerasi pekerja, komposisi paket remunerasi (gaji dan benefit lain), dilaksanakan sesuai SK Direksi No. B.34/Dir.04.05/MSDM/xII/2017 Pasal 4, No. 2.

Struktur upah meliputi;

1. Upah pokok.
2. Tunjangan Jabatan.
3. Tunjangan Khusus.
4. Tunjangan Wilayah.
5. Tunjangan Kemahalan.
6. Tunjangan Penugasan.
7. Tunjangan Peralihan.

Selain itu, Bank Raya juga memberikan tunjangan pekerja yang merupakan komponen tambahan dalam berbagai bentuk selain gaji pokok yang diberikan perusahaan kepada pekerja. Jenis dan besaran tunjangan untuk setiap pekerja berbeda-beda menyesuaikan golongan pekerja. Jenis dan besaran tunjangan pekerja diatur dalam SK B.17/Dir.01.02/ Human Capital/KSD/02/2019 tanggal 21 Februari 2019 perihal Ketentuan Pengupahan Pekerja BRI Agro dan No. Kpts.B.09/Dir.01.02/HCP/KHC/09/2020 tanggal 15 September 2020 perihal Tunjangan Penyesuaian Upah Minimum Regional (TP UMR). [GRI 103-1, GRI 103-2, GRI 103-3]

Bank Raya senantiasa taat terhadap peraturan perundang undangan yang mengatur tentang upah atau gaji karyawan, termasuk ketentuan mengenai Upah Minimum Regional/Propinsi. Ihwal besaran upah,

Bank Raya is devoted to its workers' wellbeing. Employee compensation and benefit programmes that are changed in accordance with applicable legislative standards, including the Provincial Minimum Wage (UMP). Compensation changes are made on a periodic basis for all permanent employees based on performance, and for contract workers and prospective hires, salary adjustments are made to the area minimum wage (UMR).

Bank Raya's pay policy is based on the measurement of effective collaborative work, which is expressed in a single unit by the yearly achievement/realization of the Bank's Business Plan (RBB) and the Board of Directors' Policy.

Employees are compensated depending on their expertise, experience, and performance. The greater an employee's performance, competency, accomplishments, and responsibilities, the higher his or her remuneration and perks.

Bank Raya's pay policies, including employee compensation packages and compensation package composition (salary and other benefits), are implemented in compliance with Article 4 of the Board of Directors' Decree No. B.34/Dir.04.05/MSDM/xII/2017.

The wage structure consists of the following:

1. Basic wages.
2. Position Allowance.
3. Special Allowance.
4. Regional Allowance.
5. Expensive Allowance.
6. Assignment Allowance.
7. Transitional Allowance.

Additionally, Bank Raya offers employee perks, which are components in many forms other than the basic pay paid to employees by the organisation. Each worker receives a different kind and quantity of allowance, depending on the group of employees. Employee benefits are governed by SK B.17/Dir.01.02/Human Capital/KSD/02/2019 dated February 21, 2019 about Wage Provisions for BRI Agro Workers and No. Kpts.B.09/Dir.01.02/HCP/KHC/09/2020 dated September 15, 2020 on the Regional Minimum Wage Adjustment Allowance (TP UMR). [GRI 103-1, GRI 103-2, GRI 103-3]

Bank Raya constantly complies with any laws and regulations regulating employee pay and salaries, including the Regional/ Provincial Minimum Wage standards. Bank Raya makes no distinctions

Bank Raya tidak membedakan berdasarkan *gender* atau jenis kelamin. Dalam hal ini, Bank Raya memberikan gaji karyawan pemula selalu di atas UMR. [GRI 202-1, GRI 405-2][F.20]

in terms of compensation amounts based on gender or sexual orientation. In this situation, Bank Raya pays rookie workers a compensation that is always more than the minimum wage. [GRI 202-1, GRI 405-2][F.20]

No	Wilayah Operasi Operational Are	Upah Minimum Setempat Local Minimum Wage	Upah Karyawan Golongan Terendah Lowest Employee Wages	Persentase Percentage
1.	DKI Jakarta	Rp4.416.186,-	Rp4.300.000,-	97,37%
2.	Bogor	Rp4.169.808,-	Rp4.550.000,-	109,12%
3.	Cikarang	Rp4.798.312,-	Rp4.600.000,-	95,87%
4.	Bandung	Rp3.742.276,-	Rp4.375.000,-	116,91%
5.	Solo	Rp2.013.810,-	Rp3.385.000,-	168,09%
6.	Semarang	Rp2.810.025,-	Rp3.385.000,-	120,46%
7.	Surabaya	Rp4.300.479,-	Rp4.300.000,-	99,99%
8.	Lampung	Rp2.432.001,-	Rp3.695.000,-	151,93%
9.	Palembang	Rp3.270.093,-	Rp3.825.000,-	116,97%
10.	Jambi	Rp2.630.161,-	Rp3.385.000,-	128,70%
11.	Pekanbaru	Rp2.997.971,-	Rp3.385.000,-	112,91%
12.	Medan	Rp3.329.867,-	Rp3.385.000,-	101,66%
13.	Rantau Prapat	Rp2.895.289,-	Rp3.695.000,-	127,62%
14.	Pontianak	Rp2.399.698,-	Rp3.695.000,-	153,98%
15.	Balikpapan	Rp2.981.378,-	Rp3.695.000,-	123,94%
16.	Makassar	Rp3.165.876,-	Rp3.385.000,-	106,92%

Sehingga, Bank Raya memiliki perbandingan rata-rata Upah Karyawan Baru Tingkat Terendah dengan UMP 2021 sebesar 95,87%.

Thus, Bank Raya has the lowest average wage comparability with the 2021 UMP of 95,87%.

Dampak Ekonomi Tidak Langsung Indirect Economic Impact

Bank Raya sebagai lembaga jasa keuangan berkomitmen agar kehadirannya memberikan manfaat sebesar-besarnya untuk para pemangku kepentingan. Di antara manfaat yang bisa dirasakan masyarakat di sekitar Bank adalah terbukanya lapangan kerja dengan mengikuti proses dan memenuhi syarat-syarat rekrutmen yang berlaku di Bank. Tak hanya itu, keberadaan Bank juga membuka peluang bagi pelaku usaha lokal untuk menjadi pemasok atau *vendor* barang dan jasa yang dibutuhkan Bank. Dengan adanya dampak positif tersebut, maka akan membuka peluang terjadinya peningkatan taraf hidup dan perekonomian masyarakat setempat. [GRI 103-1][F.23]

Bank Raya is committed as a financial services institution to provide the greatest benefit to stakeholders. Among the benefits that the masyarakat in the vicinity of the Bank may get is the ability to do business by following procedures and adhering to all applicable laws and regulations. Not only that, keberadaan Bank membuka peluang bagi pemasok atau *vendor* barang dan jasa yang dibutuhkan Bank. Due to the presence of such positive indicators, it will provide an opportunity for the masyarakat to improve its living standards and economic performance. [GRI 103-1][F.23]

Selain membuka lapangan kerja dan membuka peluang para pengusaha lokal menjadi pemasok, manfaat atas keberadaan Bank Raya juga dirasakan masyarakat melalui penerapan berbagai program kegiatan sebagai implementasi Tanggung Jawab Sosial dan Lingkungan (TJSL), sebagaimana diatur dalam Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas. TJSL adalah komitmen Bank untuk berperan serta dalam pembangunan ekonomi berkelanjutan guna meningkatkan kualitas kehidupan dan lingkungan yang bermanfaat, baik bagi Bank sendiri, komunitas setempat, maupun masyarakat pada umumnya. [GRI 103-2]

Program CSR Bank Raya

Dalam implementasinya, TJSL di Bank Raya diwujudkan secara konsisten melalui Program Tanggung Jawab Sosial Perusahaan (*Corporate Social Responsibility/CSR*). Untuk mendapatkan hasil yang optimal, sebelum menyelenggarakan program, Bank berupaya menjalin komunikasi dengan masyarakat setempat. Melalui proses ini, maka program-program CSR yang diselenggarakan Bank Raya akan benar-benar selaras dan sesuai dengan kebutuhan mereka. Selain sesuai dengan kebutuhan masyarakat setempat, pelaksanaan program-program tersebut sekaligus merupakan dukungan Bank terhadap pencapaian Tujuan Pembangunan Berkelanjutan (*Sustainable Development Goals/SDGs*), yang saat ini sedang digiatkan pencapaiannya oleh pemerintah.

Program CSR sebagai salah satu bentuk program pemberdayaan kondisi sosial masyarakat dilaksanakan dengan menggunakan anggaran biaya Bank yang dicatat secara *onbalance*. Selama tahun 2021, Bank Raya telah menyelenggarakan berbagai Program CSR dengan total dana sebesar Rp545.000.000,-

Rincian program CSR selama tahun pelaporan adalah sebagai berikut: [GRI 103-3, GRI 203-1, GRI 203-2] [F.3]

Apart from establishing a work environment and providing opportunities for local entrepreneurs to grow, the benefits of Bank Raya's presence are also shared with the public through the implementation of a variety of programmes and initiatives as part of the implementation of Tanggung Jawab Sosial dan Lingkungan (TJSL), as outlined in Undang-Undang No. 40 Tahun 2007 on Perseroan Terbatas. TJSL adalah komitmen Bank untuk berperan dan pembangunan ekonomi berkelanjutan untuk meningkatkan kualitas kehidupan dan lingkungan yang bermanfaat, baik bagi Bank, komunitas setempat, atau masyarakat tertentu. [GRI 103-2]

CSR Program of Bank Raya

CSR is constantly implemented by Bank Raya via the Corporate Social Responsibility (CSR) Program. Prior to launching the programme, the Bank aims to create contact with the local community in order to get the best outcomes. Bank Raya's CSR activities will be really linked with and responsive to their demands as a result of this procedure. Along with fulfilling local community needs, the Bank's execution of these initiatives contributes to the accomplishment of the Sustainable Development Goals (SDGs), which the government is actively pursuing.

The CSR programme, which serves as an empowering tool for the community's socioeconomic situation, is funded via the Bank's on-balance-sheet budget. Throughout 2021, Bank Raya has scheduled a variety of CSR programmes totaling IDR 545.000.000,-

The following table summarises the CSR program's activities throughout the reporting year.: [GRI 103-3, GRI 203-1, GRI 203-2] [F.3]

Kegiatan yang Dilaksanakan Conducted Activities

Tahun 2021, Bank Raya telah menjalankan beberapa kegiatan CSR yang berkaitan dengan pengembangan sosial kemasyarakatan, antara lain:

Bank Raya engaged in various CSR programmes aimed towards societal improvement in 2021, including the following:

- Anggaran dan Realisasi Anggaran CSR 2021
- Budget and Implementation of CSR in 2021

No	Realisasi Program Tanggung Jawab Sosial Bantuan untuk bencana alam Tahun 2021 Realisation of Social Responsibility Program Assistance for Natural Disasters in 2021		
	Program Tanggung Jawab Sosial Social Responsibility Program	Penerima Program Recepient	Waktu Pelaksanaan Program Time of Program Exercised
1.	Bantuan Bencana Alam "IJK Peduli Bencana"	Berbagai Daerah di Indonesia	27 Januari 2021
	Natural Disaster Assistance "IJK Cares for Disaster"	Several Areas in Indonesia	January 27, 2021

Realisasi Program Tanggung Jawab Sosial Aspek Sosial Kemasyarakatan Tahun 2021 Realisation of Social Responsibility Program for Community Social Aspects in 2021

No	Program Tanggung Jawab Sosial Social Responsibility Program	Penerima Program Recepient	Waktu Pelaksanaan Program Time of Program Exercised
1.	Pemberian Bibit Talas Beneng di Air Molek Riau Giving Taro Beneng Seeds in Air Molek Riau	Masyarakat Umum Public	12 Maret 2021 March 12, 2021
2.	Renovasi Gereja Kristen Protestan Simalungun Jemaat Bogor Renovation of the Simalungun Protestant Christian Church, the Bogor Congregation	Masyarakat Umum Public	24 Maret 2021 March 24, 2021
3.	Bantuan Pendidikan LKSA Panti Asuhan YAKIIN YAKIIN Orphanage LKSA Education Assistance	Masyarakat Umum Public	30 Maret 2021 March 30, 2021
4.	Bhakti Sosial Pembagian Paket Sembako kaum Dhuafa dan Anak Yatim Social Service Distribution of Basic Food Packages to You Dhuafa and Orphans	Masyarakat Umum Public	30 April 2021 April 30, 2021
5.	CSR Ramadhan 1442 H CSR Ramadhan 1442 H	Masyarakat Umum Public	1 Mei 2021 May 1, 2021
6.	Penyaluran Hewan Qurban 1442 H Distribution of Sacrificial Animals 1442 H	Masyarakat Umum Public	19 Juli 2021 July 19, 2021
7.	Kegiatan Vaksin Covid-19 Kerjasama dengan Polsek Pancoran Covid-19 Vaccine Activities in Collaboration with Pancoran Police	Masyarakat Umum Public	September 2021 September 2021
8.	Rehabilitasi Pembangunan Masjid Baitul Hikmah Rehabilitation of Baitul Hikmah Mosque Construction	Masyarakat Umum Public	10 November 2021 November 10, 2021
9.	CSR Renovasi Polsek Pancoran CSR Pancoran Police Renovation	Masyarakat Umum Public	24 November 2021 November 24, 2021
10.	Sumbangan untuk Milad Ormas Forum Betawi Rempug Donations for the Anniversary of the Betawi Rempug Forum Community Organizations	Masyarakat Umum Public	24 Desember 2021 December 24, 2021

No	Program Tanggung Jawab Sosial Social Responsibility Program	Penerima Program Receptient	Waktu Pelaksanaan Program Time of Program Exercised
11.	Bantuan Bencana Alam Erupsi Gunung Semeru Mount Semeru Eruption Natural Disaster Assistance	Masyarakat Umum Public	24 Desember 2021 December 24, 2021
12.	Bantuan Infrastruktur Desa Digital Digital Village Infrastructure Assistance	Masyarakat Umum Public	24 Desember 2021 December 24, 2021
13.	Bantuan CSR Pendidikan Buku Paket SMK Paedah Kencana CSR Assistance for Paedah Kencana Vocational School Book Package Education	Masyarakat Umum Public	24 Desember 2021 December 24, 2021



Antikorupsi Anti Corruption

Sejalan dengan semangat pemerintah Indonesia memberantas korupsi, Bank Raya memiliki komitmen serupa. Komitmen itu tak terpisahkan dengan implementasi prinsip tata kelola yang baik (GCG), yang tujuannya antara lain meningkatkan kepercayaan nasabah dan pemegang saham. Praktik antikorupsi semakin bermakna karena Perseroan merupakan lembaga yang mendapat amanat untuk mengelola uang nasabah dalam jumlah yang sangat besar. [GRI 103-1, GRI 103-2]

Untuk menjaga amanat, sekaligus meningkatkan kepercayaan nasabah dan pemegang saham, maka pintu-pintu yang membuka peluang terjadinya penyalahgunaan kekuasaan, termasuk kemungkinan terjadinya praktik gratifikasi dan penyuapan, musti ditutup. Komitmen menutup peluang terjadinya korupsi berlaku bagi manajemen Bank Raya dari lini terbawah hingga teratas. Dengan komitmen tersebut, pada 2021, tidak ada insiden korupsi yang terbukti dan tindakan yang diambil atas insiden tersebut. [GRI 103-3, GRI 205-3]

Bank Raya is committed to eradicating corruption in the same way as the Indonesian government is. This commitment is inextricably linked to the application of good governance principles (GCG), one of which is to increase customer and shareholder confidence. Because the Company is tasked with managing substantial sums of money from customers, anti-corruption policies are becoming more important. [GRI 103-1, GRI 103-2]

The doors that create potential for abuse of authority, including the possibility of reward and bribery techniques, must be blocked in order to keep the mandate while also enhancing the confidence of consumers and shareholders. From the bottom to the top, Bank Raya's dedication to eliminating corruption opportunities extends to all levels of management. With this vow, no confirmed instances of corruption will exist in 2021, and those that do will be dealt with. [GRI 103-3, GRI 205-3]

Kinerja Lingkungan Keberlanjutan

Sustainable Environmental Performance

Bank Raya bergerak di bidang jasa perbankan, sehingga kegiatan usaha Bank tidak memiliki dampak dan risiko langsung terhadap lingkungan hidup. Meskipun demikian, Bank memiliki kontribusi terhadap kerusakan lingkungan hidup melalui sektor pembiayaannya. terkait hal ini, Bank telah memiliki kebijakan kredit ramah lingkungan, di mana Bank melakukan penilaian terhadap kredit yang akan dikururkan. penilaian ini tak hanya semata pada aspek finansial debitur, tetapi juga terkait aspek sosial dan lingkungan. Kebijakan ini telah dituangkan dalam SK Direksi no. B.062/Dir.04.05/03/2018 tentang penetapan pasar Sarapan dan Kriteria risiko yang Dapat diterima yang menyatakan bahwa nasabah harus memiliki analisis mengenai dampak lingkungan (AMDAL). [GRI 103-1, GRI 103-2]

Dalam kebijakan tersebut, Bank mensyaratkan: [GRI 103-3]

1. Tidak termasuk ke dalam negative list Badan Koordinasi penanaman Modal (BKPM), Asosiasi Jasa Konstruksi Nasional (GAPENSI), Gabungan Pengusaha Kontraktor Nasional Indonesia (GAPEKNAS), Asosiasi Rekanan Pengadaan Barang dan Distributor Indonesia (ARDIN), peringkat hitam Program Penilaian Peringkat Kinerja Perusahaan Dalam Pengelolaan Lingkungan yang dikembangkan oleh Kementerian Lingkungan Hidup (PROPER), dan asosiasi profesional lainnya.
2. Untuk segmen kredit Menengah, setiap jenis usaha dan/atau kegiatan yang berdampak terhadap lingkungan hidup harus dilengkapi dengan perizinan sesuai dengan ketentuan yang berlaku, antara lain dokumen Upaya pemantauan Lingkungan Hidup (UPL), Upaya pengelolaan Lingkungan Hidup (UKL), AMDAL, kajian/dokumen mengenai mutu/kriteria baku kerusakan lingkungan, izin lingkungan, dokumen kajian pembuangan air limbah, dll.
3. Untuk segmen kredit ritel, harus memiliki analisis Mengenai Dampak Lingkungan (AMDAL) bagi usaha/ kegiatan perusahaan berdampak penting terhadap lingkungan hidup, terutama pada perusahaan berskala besar dan atau berisiko tinggi sesuai dengan ketentuan yang berlaku.
4. Berdasarkan pertimbangan bisnis dan mendukung upaya pelestarian lingkungan hidup, maka jenis usaha terkait kayu gelondongan, *moulding*, dan *sawmill* dikeluarkan dari pasar Sasaran dan tidak dibiayai oleh seluruh Unit Kerja.

Bank Raya's business operations do not have a direct effect or risk on the environment since it provides financial services. Nonetheless, the Bank's financial sector has contributed to environmental harm. In connection with this, the Bank has an ecologically friendly credit policy, under which it assesses the credit to be issued. This evaluation is based not only on the debtor's financial situation, but also on social and environmental factors. This policy is specified in the Board of Directors' Decree no. B.062/Dir.04.05/03/2018 about the determination of the Breakfast market and Acceptable risk criteria, which stipulates that the customer must do an environmental impact study. (AMDAL). [GRI 103-1, GRI 103-2]

The Bank stipulates the following requirements under this policy: [GRI 103-3]

1. The Investment Coordinating Board (BKPM), the National Construction Services Association (GAPENSI), the Indonesian National Contracting Entrepreneurs Association (GAPEKNAS), the Association of Indonesian Procurement Partners and Distributors (ARDIN), the black rating of the Ministry of Environment's Company Performance Rating Program in Environmental Management (PROPER), and other professional associations have not included it on their negative lists.
2. Every type of business and/or activity that has an environmental impact must have a permit in accordance with applicable regulations, including documents for Environmental Monitoring Efforts (UPL), Environmental Management Efforts (UKL), AMDAL, studies/documents regarding quality/standard criteria for environmental damage, environmental permits, waste water disposal study documents, and so on, for the Medium credit segment.
3. In order to comply with relevant rules, you must have an Environmental Effect Analysis (AMDAL) for the company's business/activities that have a significant environmental impact, particularly for large-scale or high-risk businesses.
4. The sorts of enterprises associated to logs, moulding, and sawmills are excluded from the Target market and are not sponsored by all Work Units due to commercial reasons and to support environmental conservation initiatives.

Operasional Bank Ramah Lingkungan

Environmentally Friendly Bank Operations

Untuk mewujudkan operasional bank ramah lingkungan, Bank Raya telah melakukan berbagai kebijakan dengan menerapkan prinsip 3R. Sosialisasi atas prinsip-prinsip ini terus dilakukan agar tujuan awal yang ditetapkan Perusahaan tercapai. Operasional kantor yang ramah lingkungan diwujudkan melalui pengelolaan bahan baku/ material, energi, dan air agar semua bisa lebih efisien. Sejalan

Bank Raya has established different policies based on the 3R principles to achieve environmentally friendly bank operations. The propagation of these ideas is carried out on a constant basis to ensure that the Company's original goals are met. The control of raw materials, energy, and water allows for environmentally friendly office operations to be accomplished, making everything more

dengan itu, selain mendukung berbagai program kegiatan pro-lingkungan, seperti program penghijauan, Bank Raya juga berkomitmen untuk tidak membangun atau mendirikan kantor operasional yang berdekatan dengan kawasan lindung dan kawasan dengan nilai keanekaragaman hayati tinggi di luar kawasan lindung. Dengan upaya itu, maka selama tahun pelaporan, operasional Bank Raya tidak membawa dampak buruk bagi keanekaragaman hayati di Indonesia. [GRI 103-3, GRI 304-1]

efficient. In keeping with this, Bank Raya has promised not to develop or create operating offices near to protected areas or locations of high biodiversity value outside protected areas, in addition to supporting different pro-environmental activity projects, such as reforestation programmes. As a result of these measures, Bank Raya activities in Indonesia had no negative effect on biodiversity throughout the reporting year. [GRI 103-3, GRI 304-1]

Efisiensi Penggunaan Kertas

Efficiency in Paper Use

Kertas merupakan salah satu kebutuhan bahan baku atau material dalam operasional Bank Raya. Kertas digunakan untuk berbagai keperluan administrasi, surat-menyurat, mencetak dokumen, transaksi nasabah, dan sebagainya. Bank Raya menyadari bahwa bahan baku kertas adalah pohon yang diolah menjadi bubur kertas. Dengan demikian, semakin banyak menggunakan kertas, otomatis akan sejalan dengan penambahan pohon yang ditebang sebagai bahan baku kertas. Begitu pula sebaliknya. Berdasarkan latar belakang seperti itu, maka Bank berupaya secara sungguh-sungguh untuk mengurangi penggunaan kertas. [GRI 103-1]

Paper is one of the raw materials or components required by Bank Raya. Paper is utilised for a variety of administrative tasks, including as communication, document printing, and client transactions. The basic material for paper, according to Bank Raya, is trees that have been converted into pulp. As a result, the increased usage of paper will inevitably result in the addition of fallen trees as paper raw materials. The reverse is also true. As a result of this, the Bank is working hard to lessen its reliance on paper. [GRI 103-1]

Bank berupaya untuk mengurangi penggunaan kertas dengan terus melakukan sosialisasi penggunaan sistem *electronic office* (e-office) kepada para pekerja perseroan. pengurangan penggunaan kertas dilakukan sebagai kontribusi Bank dalam mengurangi emisi Gas Rumah Kaca (GRK). Berikut data penggunaan kertas perusahaan. [GRI 103-2, GRI 103-3]

The Bank is constantly educating its workers on how to utilise the electronic office (e-office) system in order to decrease the usage of paper. The Bank's contribution to lowering Greenhouse Gas (GHG) emissions is to reduce the amount of paper used. The following is information about the company's paper use. [GRI 103-2, GRI 103-3]

Walaupun kertas termasuk bahan baku/material yang bisa didaur ulang, namun Bank Raya tidak menggunakan hasil daur ulang tersebut dalam operasional sehari-hari. [F.5]

Despite the fact that paper is a recyclable raw material, Bank Raya does not employ recycled paper in its everyday operations.. [F.5]

	Satuan Denomination	2021	2020	2019
Penggunaan Kertas Paper Use	Rim Ream	2.024	2.171	2.302

Selama tahun 2021, Bank Raya menggunakan kertas sebanyak 2.024 rim, turun dibandingkan penggunaan tahun 2020, yang tercatat sebanyak 2.171 rim. [GRI 301-1]

Bank Raya utilised 2,024 reams of paper in 2021, a decrease from 2,171 reams in 2020. [GRI 301-1]

Efisiensi Energi Energy Efficiency

Energi merupakan kebutuhan vital bagi operasional keseharian Bank Raya. Energi yang digunakan Bank Raya adalah listrik dan bahan bakar minyak (BBM). Ketersediaan listrik dipasok oleh PT PLN (Persero), yang digunakan untuk berbagai keperluan. Sedangkan energi BBM diperoleh dengan pembelian ke PT Pertamina atau perusahaan lain. Sebagian besar, BBM digunakan sebagai sumber energi kendaraan operasional. Oleh karena listrik maupun BBM merupakan sumber energi tak terbarukan dan ketersediaannya semakin terbatas, maka Bank Raya berkomitmen untuk melakukan berbagai langkah penghematan. [GRI 103-1, GRI 103-2]

Upaya nyata untuk menghemat listrik, antara lain, mematikan lampu listrik, komputer dan peralatan elektronik lain begitu tak lagi diperlukan. Selain itu, Bank Raya juga memperbanyak penggunaan lampu LED yang lebih hemat energi. Sedangkan penghematan BBM dilakukan, antara lain, dengan mencatat pembelian bahan bakar minyak setiap mobil agar bisa diketahui dan dibandingkan dengan rute yang ditempuh, mengurangi rapat dengan tatap muka dan menggantikannya dengan telekonferensi sehingga penggunaan BBM untuk transportasi bisa ditekan. Kebijakan ini mendapatkan momentum dengan terjadinya pandemi Covid-19. [GRI 103-2, GRI 103-3, GRI 302-4][F.7]

Bank Raya menggunakan listrik sebesar 944.717 kWh, atau 3.400,98 GigaJoule, turun dibandingkan tahun 2020, yang menggunakan energi listrik sebesar 977.577 kWh atau 3.519,27 GigaJoule. Penurunan tersebut disebabkan kondisi PPKM Covid 19 yang mengharuskan karyawan WFH. (GRI 103-3, 302-1)[GRI 103-3, GRI 302-1][F.6]

The everyday activities of Bank Raya rely heavily on energy. Electricity and fuel oil are the sources of energy for Bank Raya (BBM). PT PLN (Persero) is responsible for the provision of power, which is utilised for a variety of reasons. In the meanwhile, fuel energy is purchased from PT Pertamina or other businesses. Fuel is the most common source of energy for operating automobiles. Because power and gasoline are nonrenewable energy sources with decreasing availability, Bank Raya is dedicated to implementing different cost-cutting measures. [GRI 103-1, GRI 103-2]

It is no longer necessary to make genuine attempts to conserve power, such as shutting off lights, computers, and other electrical devices. In addition, Bank Raya is increasing the use of more energy-efficient LED lighting. Meanwhile, fuel savings are achieved by documenting the purchase of gasoline for each automobile so that it can be known and compared to the route travelled, as well as by minimising face-to-face meetings and replacing them with teleconferencing to minimise the consumption of fuel for transportation. With the Covid-19 epidemic, this approach is gaining traction. [GRI 103-2, GRI 103-3, GRI 302-4][F.7]

Bank Raya consumes 944,717 kWh of power, or 3,400.98 GigaJoule, down from 977,577 kWh, or 3,519.27 GigaJoule, in 2020. The drop was caused by the PPKM Covid 19 requirement for WFH employees. [GRI 103-3, GRI 302-1][F.6]

	Satuan Unit	2021	2020	2019
Penggunaan Listrik Electricity Usage	Kwh	944.717	977.577	994.886
	Giga Joule	3.400,98	3.519,27	3.581,58
Intensitas Energi Energy Intensity	Kwh/m ²	160,86	166,45	169,39
Penghematan Listrik Electricity Saving	%	3	2	-
Pengeluaran atas Penggunaan Listrik Expenditure on Electricity Usage	Rp	1.074.273.012	1.110.819.535	1.112.201.285

Penggunaan Air [GRI 303-1][F.8] Water Usage [GRI 303-1][F.8]

Penggunaan air yang efisien harus menjadi komitmen bagi pelaku usaha. pertumbuhan perekonomian Indonesia yang cukup pesat telah memberikan kesempatan bagi dunia usaha untuk dapat ikut bertumbuh. Penggunaan air secara massal yang tidak terkelola dengan baik akan memberikan dampak yang buruk bagi lingkungan hidup. Penggunaan air oleh Bank berasal dari air tanah dan air PAM dengan tabel penggunaan air seperti di bawah ini:

Business actors must commit to making efficient use of water. Indonesia's strong economic expansion has given the corporate world a chance to participate in that growth. Water consumption that is not adequately managed will have a negative influence on the environment. The Bank's water use is made up of ground water and PAM water, as shown in the table below:

	Satuan Unit	2021	2020	2019
Penggunaan Air Water Usage	m ³	6.430	7.497	7.527
Intensitas Penggunaan Air Water Usage Intensity	m ³ /m ²	1.10	1,27	1,28
Penghematan Air Water Saving	%	14,23	0,40	-
Pengeluaran atas Penggunaan Air Expenditure on Water Usage	Rp	82.019.026	94.909.582	95.810.182

Pengelolaan Limbah Waste Management

Dalam operasionalnya, Bank Raya juga menghasilkan limbah, khususnya limbah domestik, terutama berupa limbah padat seperti kertas, alat tulis dan sampah plastik. Untuk penanganan limbah tersebut, Bank Raya menggunakan jasa pihak ketiga, dalam hal ini adalah Dinas Kebersihan Pemerintah Kabupaten dan Kota dimana lokasi kantor Bank berada.

Bank Raya generates trash as part of its activities, mostly home waste in the form of solid waste such as paper, stationery, and plastic garbage. Bank Raya employs the services of a third party to handle this garbage, in this instance the Sanitation Service of the Regency and City Governments where the Bank's headquarters are situated.

Sedangkan pengelolaan limbah cair yang tidak termasuk ke dalam kategori Limbah Bahan Berbahaya dan Beracun seperti air kotor menggunakan sistem septic tank yang kemudian diangkut dan dikelola menggunakan jasa pihak ketiga. [GRI 306-2][F.14]

Meanwhile, liquid waste that does not fall under the category of Hazardous and Toxic Waste, such as filthy water, is handled via a septic tank system, which is subsequently transported and managed by a third party. [GRI 306-2][F.14]

Kepatuhan Lingkungan Environmental Compliance

Bank Raya berkomitmen untuk menerapkan prinsip-prinsip keuangan berkelanjutan dalam memberikan pendanaan kepada debitur yang mematuhi ketentuan terkait sosial, lingkungan hidup dan tata kelola (LST) yang berlaku. Komitmen ini merupakan dukungan Bank pada pencapaian SDGs. Sejalan dengan prinsip penerapan keuangan berkelanjutan, Bank Raya memiliki kebijakan yang mengatur penyaluran kredit yang memperhatikan aspek sosial dan lingkungan.

Dengan penerapan komitmen tersebut, hingga akhir tahun 2021 Bank Raya tidak menerima pengaduan dari masyarakat maupun *stakeholder* lainnya mengenai permasalahan lingkungan sehingga tidak terdapat sanksi maupun denda terkait ketidakpatuhan terhadap peraturan lingkungan. [GRI 307-1][F.16]

Bank Raya is dedicated to using sustainable finance principles when providing loans to debtors that follow all relevant social, environmental, and governance (ESG) requirements. This pledge represents the Bank's support for the SDGs' accomplishment. Bank Raya has a policy that governs lending that considers social and environmental factors, in accordance with the principles of implementing sustainable financing.

With the execution of this pledge, Bank Raya will not receive any complaints from the public or other stakeholders about environmental issues until the end of 2021, ensuring that no penalties or fines are imposed for non-compliance with environmental legislation. [GRI 307-1][F.16]

Kinerja Sosial Keberlanjutan

Sustainable Social Performance

Menjadi Perbankan yang Berdampak Positif bagi Karyawan, Nasabah, maupun Masyarakat

Becoming a Banking with a Positive Impact for Employees, Customers, and Society

Bank Raya memiliki komitmen untuk memenuhi dan bersinergi dengan para pemangku kepentingannya. Bagi bank, berdasarkan identifikasi pemangku kepentingan, nasabah, karyawan, dan masyarakat merupakan pemangku kepentingan yang sangat signifikan. Dalam menjalankan bisnisnya, Bank Raya selalu memperhatikan kebutuhan dari para nasabah, karyawan, maupun masyarakat.

Untuk nasabah, Bank Raya berupaya untuk terus meningkatkan kepuasan nasabah yang antara lain dilakukan melalui penyediaan produk dan layanan yang sesuai dengan kebutuhan nasabah. Bank Raya juga terus meningkatkan pelayanan kepada nasabah melalui penerapan pelayanan prima, termasuk dengan menyediakan produk-produk digital.

Sedangkan untuk karyawan, Bank Raya berkomitmen untuk memenuhi hak-hak normatif karyawan sesuai dengan peraturan perundang-undangan yang berlaku dan sejalan dengan itu, Bank juga melakukan program pengembangan kompetensi dan kapasitas karyawan melalui program pendidikan dan pelatihan. Selain itu, Bank juga memperhatikan aspek Kesehatan dan Keselamatan Kerja untuk menjadikan Bank Raya sebagai tempat kerja pilihan. Sementara bagi masyarakat, Bank menjalankan kegiatan CSR secara berkesinambungan dengan menyediakan anggaran yang cukup.

Lebih lanjut, komitmen Bank dalam menjalankan bisnisnya dengan memperhatikan kepentingan para pemangku kepentingan juga didasari pada ketaatan perusahaan terhadap peraturan. Bank Raya memperhatikan ketaatan Bank terhadap regulasi baik dalam memenuhi kebutuhan dan pengembangan SDM yang dimiliki, memberikan pelayanan prima bagi para nasabah, dan juga berkontribusi terhadap masyarakat.

Bank Raya is dedicated to meeting the needs of its stakeholders and collaborating with them. Customers, workers, and the general public are all highly important stakeholders for banks, according to the identification of stakeholders. When it comes to operating a company, Bank Raya is constantly mindful of the demands of its customers, workers, and community.

For clients, Bank Raya seeks to promote customer happiness by providing goods and services that fulfil their demands, among other things. Bank Raya also continues to enhance customer service by implementing great service, which includes the provision of digital goods.

In terms of employees, Bank Raya is devoted to upholding workers' legal rights in compliance with relevant laws and regulations, and the bank also undertakes employee competence and capacity development programmes via education and training. In addition, to make Bank Raya the desired workplace, the bank pays close attention to Occupational Health and Safety issues. Meanwhile, the Bank continues to engage in CSR initiatives for the community by allocating sufficient funds.

In addition, the Bank's commitment to doing business while considering the interests of stakeholders is founded on the company's adherence to legislation. Bank Raya pays close attention to regulatory compliance in satisfying the requirements and development of its people resources, offering great customer service, and contributing to society.

Komitmen Bank terhadap Pengembangan SDM

Bank's Commitment to HR Development

Sumber daya manusia (SDM) merupakan salah satu faktor penting bagi keberlangsungan usaha Bank. SDM adalah penggerak, sekaligus elemen yang berada di garda terdepan pelayanan dan operasional sehari-hari. Dengan posisi yang sangat strategis seperti itu, maka kualitas SDM, yaitu individu-individu yang bekerja di Bank, akan sangat menentukan masa depan Bank Raya. Semakin bagus kualitas karyawan yang ada, maka semakin besar pula harapan Bank Raya untuk semakin maju dan berkembang. Begitu pula sebaliknya.

[GRI 103-1]

Human resources (HR) is one of the most crucial aspects of the Bank's long-term viability. HR is both the driving force and a key component of day-to-day services and operations. With such a critical position, the quality of human resources, namely those who work for Bank Raya, will have a significant impact on the bank's future. The higher the quality of current staff, the more likely Bank Raya will flourish and develop and the other way around.

[GRI 103-1]

Untuk mendapatkan kualitas karyawan terbaik, Bank Raya menyusun *Roadmap Human Capital* yang dapat membantu organisasi dalam menyusun kebijakan SDM, strategi dan program meningkatkan kemampuan karyawan sehingga membantu mereka mencapai cita-cita dan tujuan organisasi. *Roadmap Human Capital* menjadi panduan bagi Bank dalam menciptakan organisasi yang berkinerja unggul dan efektif dengan mencari dan mendapatkan SDM yang tepat, memberi motivasi dan penghargaan kepada karyawan dengan kinerja terbaik. Penyusunan *Roadmap Human Capital* sebagai kebijakan internal Bank mengacu pada peraturan ketenagakerjaan yang berlaku, khususnya Undang-Undang No. 13 tahun 2003 tentang Ketenagakerjaan, serta praktik-praktik ketenagakerjaan yang umum dilakukan di Indonesia. [GRI 103-2]

Bank Raya has developed a Human Capital Roadmap to assist firms in implementing HR policies, strategies, and initiatives to strengthen employee skills and help them accomplish the organization's goals and objectives. The People Capital Roadmap assists the Bank in establishing a superior and effective performing company by identifying and getting the greatest human resources, as well as encouraging and rewarding top performers. The Bank's formulation of the Human Capital Roadmap as an internal policy adheres to existing labour rules, particularly Law No. 13 of 2003 on Manpower, as well as typical labour practises in Indonesia. [GRI 103-2]

Rekrutmen dan Perputaran Karyawan [GRI 401-1] Recruitment and Turnover [GRI 401-1]

Dalam melakukan rekrutmen, Bank berkomitmen untuk bersifat terbuka tanpa diskriminasi bagi setiap orang selama memenuhi persyaratan yang telah ditetapkan, selain itu seperti yang disampaikan pada bagian tata kelola bahwa Bank menghindari adanya konflik kepentingan salah satunya dalam hal rekrutmen pegawai. Semua calon pegawai mendapatkan perlakuan yang sama yakni harus melalui proses seleksi yang sama tanpa membedakan ada atau tidaknya hubungan khusus dengan pegawai internal Bank. Bank juga membuka peluang yang sama untuk penduduk lokal mengisi berbagai posisi yang dibutuhkan, termasuk di level manajer senior. [GRI 103-1]

The Bank is dedicated to conducting recruitment in an open and nondiscriminatory manner for everyone as long as the standards are met; moreover, as indicated in the governance section, the Bank avoids conflicts of interest, one of which is in staff recruitment. All potential employees are treated the same, which means they must go through the same selection procedure regardless of whether or not they have a particular connection with internal Bank workers. The Bank also gives local inhabitants an equal chance to fill other needed roles, including top management positions. [GRI 103-1]

Proses rekrutmen dapat berasal dari internal maupun eksternal Bank. Dari internal Bank, proses rekrutmen dapat berupa promosi, rotasi, dan demosi. Sedangkan dari eksternal Bank, proses rekrutmen dilaksanakan melalui proses seleksi *fresh graduate* maupun tenaga ahli/profesional.

The recruitment process may include both internal and external sources. Internally, the recruitment process may take the form of promotion, rotation, and demotion. Meanwhile, the Bank's external hiring is handled via a screening process for fresh graduates and experts/professionals.

Proses rekrutmen di Bank Raya dilakukan melalui beberapa pola, antara lain pola rekrutmen bagi Pelaksana, Staf atau disebut calon pimpinan (yang dilakukan melalui Program BFLP (*BRILLiant Future Leadership Program*) bersama BRI group), serta untuk jabatan-jabatan tertentu dilakukan melalui *Talent Hiring*. Dalam melakukan Rekrutmen *Pro Hire Eksternal* khususnya untuk level Kepala Bagian sampai dengan Kepala Divisi yang mengacu pada SK No. Kpts.34/Dir.01.02/Human Capital/IX/2017 tanggal 29 September 2017 tentang Ketentuan Penerimaan dan Penempatan Pekerja melalui Jalur Khusus (*Special Hiring*) Revisi Pertama. [GRI 103-2]

Bank Raya's recruitment process is structured in several ways, including the recruitment pattern for executives, staff, and so-called leadership candidates (which is conducted in conjunction with the BRI group through the BFLP Program (*BRILLiant Future Leadership Program*), as well as for certain positions through *Talent Hiring*. In conducting external pro-hire recruitment, particularly at the Head of Division level and up to the Head of Division, and in accordance with SK No. Kpts.34/Dir.01.02/Human Capital/IX/2017 dated September 29, 2017 regarding Provisions for Acceptance and Placement of Workers via the Special Hiring First Revision. [GRI 103-2]

Berdasarkan proses rekrutmen pada tahun 2021, Bank Raya berhasil menjangkau karyawan baru sebanyak 157 orang. Jumlah ini merupakan akumulasi dari penambahan karyawan melalui rekrutmen dan pengurangan karyawan karena berbagai alasan, seperti pensiun, pensiun dini, meninggal, mengundurkan diri, dan sebagainya. Berdasarkan penambahan dan pengurangan karyawan tersebut, Bank bisa menghitung tingkat perputaran (*turnover*) pegawai pada tahun pelaporan. [GRI 401-1]

According to the recruiting procedure in 2021, Bank Raya recruited as many as 157 individuals. This figure represents the accumulation of new workers via recruiting and the decrease of existing employees for a variety of causes, including retirement, early retirement, death, and resignation. The Bank may compute the employee turnover rate for the reporting year based on the addition and removal of personnel. [GRI 401-1]

Komposisi pegawai baru berdasarkan *gender*, wilayah kerja, dan kelompok usia disajikan dalam tabel berikut: [GRI 103-3. GRI 401-1]

The following table summarises the makeup of new employees by gender, occupational field, and age group: [GRI 103-3. GRI 401-1]

Komposisi Berdasarkan Composition By		2021	2020	2019
Usia Age	Baby Boomers (>56 tahun) Baby Boomers (>56 years of age)	0	1	5
	Gen X (41 – 55 tahun) Gen X (41 – 55 years of age)	4	4	3
	Gen Y/Milenials (25 – 40 tahun) Gen Y/Millennials (25 – 40 years of age)	87	5	117
	Gen Z (<25 tahun) Gen Z (<25 years of age)	66	37	65
Jenis Kelamin Gender	Laki-laki Male	86	48	94
	Perempuan Female	71	45	96
Penempatan Placement	Kantor Pusat Headquarters	62	31	60
	Kantor Cabang Branch Office	95	62	130
Jumlah Total		157	93	190

Selain ada penambahan karyawan baru, karyawan Bank Raya pada tahun 2021 mengalami pengurangan karena adanya karyawan yang meninggalkan Bank dengan berbagai alasan yang dibenarkan undang-undang (*turnover*). Pada tahun pelaporan, jumlah karyawan yang berhenti tercatat sebanyak 135 orang. Hal ini menunjukkan bahwa tingkat *turnover* Bank adalah sebesar 135%. Bila dibandingkan tahun 2020, *turnover* karyawan tersebut meningkat dari 1,84%.

Along with the growth of new employees, Bank Raya's workforce will shrink in 2021 as employees leave for a variety of legal reasons (*turnover*). There were 135 employees who resigned during the reporting year. This indicates that the Bank's turnover rate is 135%. Employee turnover increased from 1.84% in 2016 to 1.84% in 2020.

Komposisi karyawan yang meninggalkan Bank Raya selengkapnya disajikan dalam tabel berikut: [GRI 103-3. GRI 401-1]

The following table summarises the composition of employees that leave Bank Raya: [GRI 103-3. GRI 401-1]

Komposisi Berdasarkan Composition BY		2021	2020	2019
Usia Age	Baby Boomers (>56 tahun) Baby Boomers (>56 years of age)	22	8	18
	Gen X (41 – 55 tahun) Gen X (41 – 55 years of age)	13	4	11
	Gen Y/Milenials (25 – 40 tahun) Gen Y/Millennials (25 – 40 years of age)	96	70	108
	Gen Z (<25 tahun) Gen Z (<25 years of age)	4	13	12
Jenis Kelamin Gender	Laki-laki Male	64	51	83
	Perempuan Female	71	44	60
Penempatan Placement	Kantor Pusat Headquarters	43	34	51
	Kantor Cabang Branch Office	92	61	92
Jumlah Total		135	95	143

Keberagaman, Kesetaraan Kesempatan Kerja, dan Non-Diskriminasi Diversity, Equal Employment Opportunity, and Non-Discrimination

Seluruh peraturan internal Bank yang berlaku diterapkan secara konsisten dan setara kepada seluruh pekerja tanpa membedakan *gender*. Demikian pula dengan kesempatan kerja yang ditawarkan berlaku bagi seluruh pekerja, dimana posisi-posisi yang ada tidak mencantumkan kualifikasi yang membedakan berdasarkan *gender*. Kualifikasi yang ada di posisi (*position requirement*) hanya mensyaratkan pendidikan dan kompetensi (*soft skill* dan *hard skill*). Hak (kompensasi, benefit, kesempatan pengembangan karir dan kompetensi, waktu kerja, fasilitas kerja) dan kewajiban berlaku untuk seluruh pekerja tanpa membedakan *gender*. [GRI 405-1; GRI 406-1]

All internal Bank policies are regularly and uniformly enforced to all workers, regardless of gender. Similarly, job possibilities are available to all employees if current roles do not require gender-specific requirements. Job qualifications (position criteria) are limited to education and competence (soft skills and hard skills). All workers, regardless of gender, have the same rights and duties (pay, benefits, career and competence development opportunities, working hours, and work facilities). [GRI 405-1; GRI 406-1]

Keselamatan Kerja [F.21] Work Safety [F.21]

Upaya peningkatan perlindungan pekerja merupakan satu hal yang senantiasa mendapatkan perhatian serius dari Bank Raya. Kebijakan peningkatan perlindungan pekerja ini ditujukan untuk mendorong produktivitas pekerja. Bank Raya secara konsisten melakukan evaluasi terhadap kinerja pekerja dan mengaitkannya dengan

Efforts to improve worker protection are constantly given significant consideration by Bank Raya. This strategy of enhancing worker protection aims to promote worker productivity. Bank Raya consistently evaluates employee performance and correlates it with the provision of equitable remuneration for both permanent

pemberian remunerasi secara adil baik pekerja tetap maupun tidak tetap, berdasarkan bobot dan tanggung jawabnya mencakup *benefit* asuransi, Jaminan Kecelakaan Kerja, Jaminan Kematian, Jaminan Kesehatan. [GRI 103-1; GRI 103-2; GRI 103-3]

Jaminan Kecelakaan Kerja diberikan dalam rangka melindungi pekerja dari risiko aktivitas kerja pekerja. Sepanjang tahun 2020 tidak terdapat gangguan keamanan dan keselamatan kerja pekerja.

Bank Raya juga menyediakan fasilitas keselamatan kerja di lingkungan kerja, antara lain :

1. Penyediaan apar sebagai alat pemadam darurat
2. Penyediaan Sprinkle pada Instalasi Gedung
3. Penyediaan *Smoke Detector* Sebagai alarm tanda bahaya kebakaran
4. Speaker untuk pemberitahuan keadaan darurat
5. Penyediaan Informasi tangga Darurat

Selain itu, Bank Raya juga melakukan pelatihan keselamatan kerja [GRI 403-5]

1. Sosialisasi mengenai kesehatan dalam menghadapi Covid-19 diputar di televisi yang tersedia di Unit Kerja Bank Raya.
2. Melakukan rapid test (antigen) untuk kegiatan yang masih membutuhkan tatap muka.
3. Selain itu juga perseroan menyediakan *Safe House* untuk isolasi mandiri bagi pekerja yang terinfeksi virus Covid-19 dengan fasilitas penyediaan tenaga kesehatan, multivitamin, jadwal swab rutin, akomodasi dan konsumsi selama perawatan berlangsung.

and temporary employees, based on their weights and responsibilities, which include insurance benefits, work accident insurance, death insurance, and health insurance. [GRI 103-1; GRI 103-2; GRI 103-3]

Work Accident Insurance is provided in order to protect workers from the risks of workers' work activities. Throughout 2020 there were no disturbances in the safety and security of workers.

Bank Raya also offers workplace safety amenities, such as locker rooms:

1. Provision of fire extinguishers as an emergency extinguisher
2. Provision of Sprinkles on Building Installations
3. Provision of Smoke Detector as a fire alarm
4. Speaker for emergency notification
5. Provision of Emergency Stair Information

Furthermore, Bank Raya provides workplace safety training. [GRI 403-5]

1. Health socialisation is shown on the television provided at the Bank Raya Work Unit while dealing with Covid-19.
2. Conduct quick testing (antigens) for tasks that need direct contact.
3. Additionally, the Company offers a Safe House for self-isolation of employees afflicted with the Covid-19 virus, which includes facilities for giving health personnel with multivitamins, regular swab schedules, housing, and food during treatment.

Pekerja Anak dan Kerja Paksa [F.19] Child Labour and Forced Labour [F.19]

Bank Raya memiliki kebijakan yang jelas tentang usia minimal pegawai maupun jam kerja pegawai. Sesuai dengan ketentuan Bank, usia minimal pegawai Bank Raya adalah 19 tahun. Sementara itu, jam kerja yang disepakati adalah 8 (delapan) jam 1 (satu) hari dan 40 (empat puluh) jam 1 (satu) minggu untuk 5 (lima) hari kerja dalam 1 (satu) minggu, sesuai dengan pasal 77, Undang-Undang No.13 Tahun 2003 tentang Ketenagakerjaan.

Bank Raya has unambiguous standards about the minimum age of workers and their working hours. Bank Raya staff must be at least 19 years of age in compliance with Bank Raya standards. In the meantime, the agreed upon working hours are 8 (eight) hours each day. One (1) day and forty (forty) hours 1 (one) week for 5 (five) working days in 1 (one) week, in line with Article 77 of the Manpower Law No. 13 of 2003.

Mengutamakan Kepuasan dan Loyalitas Nasabah Setting Customer Satisfaction and Loyalty as a Priority

Nasabah merupakan salah satu pemangku utama bagi Bank Raya. Keberadaan mereka sangat menentukan perkembangan dan keberlangsungan Bank. Semakin besar jumlah nasabah, maka keberlangsungan usahanya akan lebih terjamin. Begitu pula sebaliknya. Bercermin pada pentingnya nasabah, maka Bank Raya berupaya

Bank Raya's primary shareholder is the client. Their continued existence will influence the Bank's progress and viability. The greater the consumer base, the more secure the business's continuation. In the reverse direction. Bank Raya makes every effort and is focused on giving the finest and equitable goods and services to all clients

semaksimal mungkin dan berfokus untuk memberikan produk dan layanan terbaik dan setara kepada seluruh nasabah tanpa terkecuali. Melalui upaya itu, Bank berharap mampu mempertahankan, bahkan meningkatkan kepercayaan para nasabah, yang berhulu pada terwujudnya kepuasan dan loyalitas mereka kepada Bank Raya. [GRI 103-1] [F.17]

Selaras dengan upaya memberikan layanan terbaik, selama tahun 2021, Bank Raya telah mengeluarkan berbagai program dan inovasi untuk nasabah. Selain itu, Bank juga menyelenggarakan berbagai program promosi yang selain ditujukan untuk menarik nasabah baru juga untuk meningkatkan loyalitas dari nasabah yang sudah ada. [F.26][F.28]

Seperti produk dan layanan yang sudah ada sebelumnya, Bank Raya senantiasa memberikan informasi yang jelas mengenai produk dan inovasi yang dilakukan sehingga nasabah merasa aman dengan pilihannya. Dengan demikian, selama tahun pelaporan, tidak terdapat dampak negatif atas produk dan jasa yang dikeluarkan Bank, termasuk dari sisi keamanan produk bagi nasabah. Selain itu, juga tidak terdapat produk dan layanan Bank yang ditarik atau dibatalkan karena alasan tertentu. [F.27][F.29]

Komitmen Bank Raya dalam memberikan layanan dan produk terbaik, serta setara kepada seluruh nasabah merupakan implementasi dan ketaatan terhadap regulasi perlindungan nasabah sebagai konsumen. Regulasi itu, antara lain, Undang-Undang Republik Indonesia No. 8 Tahun 1999 tentang Perlindungan Konsumen, Undang-Undang No.10 Tahun 1998 tentang Perbankan, dan Peraturan Otoritas Jasa Keuangan No. 1/POJK.07/2013 tentang Perlindungan Konsumen Sektor Jasa Keuangan. [GRI 103-2][F.17]

Pengaduan Nasabah Customer Complaint

Komitmen memberikan layanan terbaik kepada nasabah, selain melalui berbagai inovasi, juga dilakukan Bank Raya melalui penyediaan saluran pengaduan nasabah. Kebijakan ini sejalan dengan Surat Edaran Otoritas Jasa Keuangan (SE0JK) Nomor 2/SE0JK.07/2014 tanggal 14 Februari 2014 tentang Pelayanan dan Penyelesaian Pengaduan Konsumen pada pelaku Jasa Keuangan. Sebagai salah satu upaya Bank dalam memberikan produk dan jasa berkualitas, dilakukan melalui layanan pengaduan nasabah yang mudah diakses. Bank telah memiliki mekanisme pengaduan nasabah yang dapat dijangkau oleh masyarakat. Untuk sarana pengaduan nasabah terbagi menjadi 2 yaitu: [GRI 103-3]

1. Melalui Layanan *Contact Center*.
2. Melalui *Customer Service* di kantor layanan Bank Raya.

Berikut bagan mekanisme pengaduan nasabah Bank.

without exception. The Bank expects that via these efforts, it will be able to retain and even enhance its customers' confidence, which originates from their happiness and devotion to Bank Raya. [GRI 103-1] [F.17]

In an attempt to give the finest service possible, Bank Raya launched a variety of initiatives and innovations for clients in 2021. Additionally, the Bank sponsors a variety of promotional initiatives targeted at acquiring new clients and retaining current ones. [F.26][F.28]

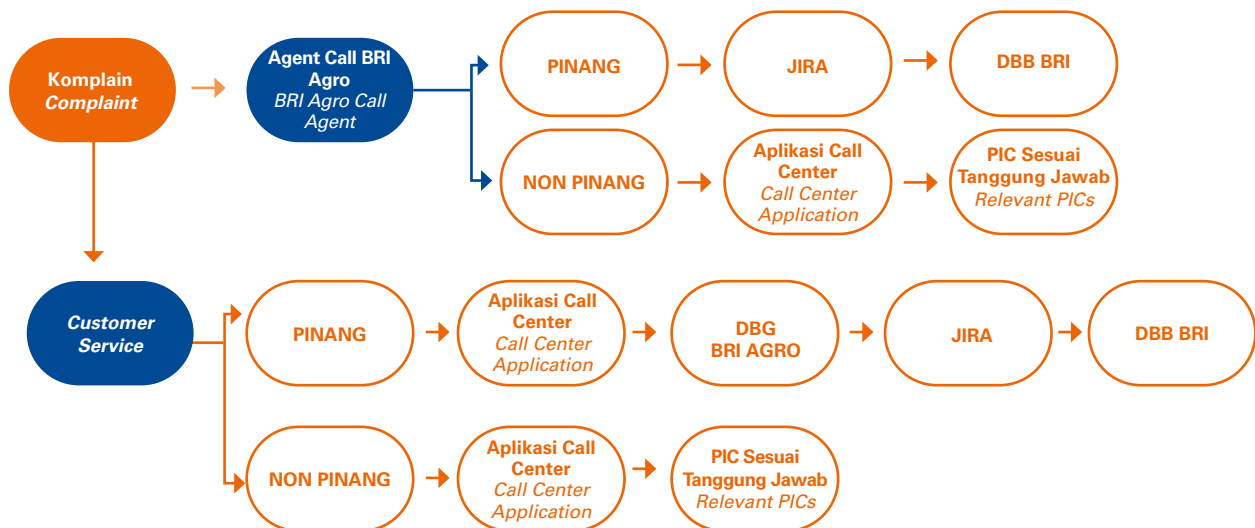
As is the case with current goods and services, Bank Raya always gives clear information about new products and innovations to ensure that customers are confident in their selections. Thus, there was no adverse effect on the Bank's goods and services throughout the reporting year, including in terms of product safety for consumers. Additionally, there are no Bank goods or services that are discontinued or terminated for specified reasons. [F.27][F.29]

Bank Raya's dedication to offering superior and equitable services and goods to all clients is shown by its application and adherence to consumer protection rules. Among the rules are the Law of the Republic of Indonesia No. 8 of 1999 on Consumer Protection, the Law of the Republic of Indonesia No. 10 of 1998 on Banking, and the Financial Services Authority's Regulation No. 1/POJK.07/2013 on Consumer Protection in the Financial Services Sector. [GRI 103-2] [F.17]

Apart from different innovations, Bank Raya demonstrates its dedication to provide the finest service to consumers by providing channels for customer complaints. This policy is consistent with the Financial Services Authority's (SE0JK) Circular Letter 2/SE0JK.07/2014 dated February 14, 2014 on Financial Services Actors' Services and Resolution of Consumer Complaints. It is carried out as part of the Bank's commitment to provide high-quality goods and services via a readily accessible customer complaint service. The Bank already has a public complaint procedure. It is separated into two sections for customer complaint facilities, namely: [GRI 103-3]

1. Via the *Contact Center Service*.
2. Via *Customer Service* at Bank Raya service offices.

The following diagram illustrates the Bank's customer complaint procedure.



Pada tahun 2021, tiket pengaduan nasabah yang terbentuk sebanyak 14.377 tiket. Pengaduan sudah diselesaikan sebanyak 14.369 tiket dan 8 tiket masih dalam proses penyelesaian di Divisi OJL Bidang Operasional, Bagian Sentra Operasi. [GRI 418-1][F.24]

In 2021, 14,377 consumer complaint tickets were created. Complaints have been resolved on a total of 14,369 tickets, with eight tickets currently pending resolution at the OJL Division of Operations, Operations Center Section. [GRI 418-1][F.24]

Tahun 2021, agent Layanan *Contact Center Bank Raya* berjumlah 5 orang dengan penggunaan 2 aplikasi yaitu aplikasi *Contact Center* yang memiliki 40 *call type* dan aplikasi *Jira* (khusus pengaduan PINANG) memiliki 19 *calltype*. Adapun untuk tugas dan tanggung jawab *agent Call Bank Raya* adalah sebagai berikut:

In 2021, Bank Raya Contact Center Service agents totalled 5 individuals who use two applications: the *Contact Center* application, which supports 40 contact kinds, and the *Jira* programme, which supports 19 call types. The following are the roles and obligations of Call Bank Raya agents:

1. Hadir sesuai dengan *shifting* yang telah dijadwalkan.
2. Wajib hadir 15 menit sebelum *login*.
3. Menerima telepon dari nasabah perihal *inquiry*, *maintenance* dan *complain*.
4. Melaksanakan kegiatan verifikasi sesuai prosedur sebelum memberikan informasi.
5. Melakukan *maintenance* maupun memproses *request* nasabah untuk meminimalkan penyalahgunaan kartu/kerugian produk berkartu.
6. Menindaklanjuti dan memonitor proses tindak lanjut penyelesaian keluhan/*request* nasabah di unit kerja terkait untuk memastikan SLA penyelesaian keluhan nasabah.
7. Menghadiri *product brief*, *training*, *coaching* dan *counseling* guna tetap menjaga prestasi kinerja.
8. Melaksanakan tugas-tugas kedinasan lainnya dari atasan (Supervisor/Kepala Bagian) sesuai dengan peran dan kompetensinya untuk mencapai target/ standar yang ditetapkan secara efektif dan efisien.

1. Attend according to the *shifting* that has been scheduled.
2. Must be present 15 minutes before logging in.
3. Receive calls from customers regarding *inquiries*, *maintenance* and *complaints*.
4. Carry out verification activities according to procedures before providing information.
5. Perform *maintenance* and process customer requests to minimize card misuse/loss of card products.
6. Follow up and monitor the follow-up process for resolving customer complaints/requests in the relevant work units to ensure SLA for resolving customer complaints.
7. Attend *product briefs*, *training*, *coaching* and *counseling* in order to maintain performance achievements.
8. Undertake other official duties from superiors (Supervisor/ Head of Section) in accordance with their roles and competencies to achieve the targets/standards that have been set effectively and efficiently.

Privasi dan Perlindungan Nasabah Privacy and Customer Protection

Salah satu kunci utama dalam memberikan pelayanan yang terbaik untuk nasabah adalah dengan menjaga kepercayaan nasabah melalui penjagaan privasi nasabah dan memberikan perlindungan terhadap data-data nasabah. Bank Raya berkomitmen melindungi informasi dan keterangan mengenai nasabah, sebagai bentuk kepatuhan atas ketentuan-ketentuan:

1. UU No.10 Tahun 1998 Tentang Perubahan Atas Undang-Undang No.7 Tahun 1992 Tentang Perbankan.
2. Peraturan Otoritas Jasa Keuangan (OJK) No.1/POJK.07/2013 Tentang Perlindungan Konsumen Sektor Jasa Keuangan.
3. Surat Edaran OJK No.14/ SEOJK.07/2014 Tentang Kerahasiaan dan Keamanan Data Dan/Atau Informasi Pribadi Konsumen.

Dalam menjaga informasi mengenai kerahasiaan nasabah, Bank meminta persetujuan tertulis dari Nasabah bahwa Bank tidak akan memberikan dan/atau menyebarluaskan Data Pribadi Nasabah kepada pihak Lain untuk tujuan komersial, kecuali ditetapkan lain oleh peraturan perundang-undangan lain yang berlaku. Dalam permintaan persetujuan Bank terlebih dahulu menjelaskan tujuan dan konsekuensi dari pemberian dan/atau penyebaran Data Pribadi Nasabah kepada pihak Lain.

One of the most critical components of offering the finest service to consumers is establishing and maintaining customer trust via the protection of customer privacy and data. Bank Raya is dedicated to safeguarding client data and information as a means of complying with the following provisions:

1. Law No. 10 of 1998 concerning Amendments to Law No. 7 of 1992 concerning Banking.
2. Financial Services Authority (OJK) Regulation No.1/POJK.07/2013 concerning Consumer Protection in the Financial Services Sector.
3. FSA Circular Letter No.14/ SEOJK.07/2014 concerning Confidentiality and Security of Consumer Data and/or Personal Information.

To protect customer confidentiality, the Bank obtains written authorization from the Customer to transmit and/or distribute the Customer's Personal Data to third parties for commercial reasons, unless other relevant laws and regulations require otherwise. The Bank first describes the purpose and implications of providing and/or disclosing Customer's Personal Data to third parties in its request for consent.

Kerahasiaan Data nasabah Customer data confidentiality

Bank Raya telah memiliki kebijakan yang mengatur tentang kerahasiaan data nasabah melalui Surat Edaran No: 04/Dir.01.05/DCM/02/2017 tentang Perlindungan Konsumen dan Kode Etik Pelayanan Konsumen. Dalam surat tersebut, Bank menjamin data kerahasiaan nasabah. Bank Raya tidak memperbolehkan pekerjaanya untuk membocorkan data-data sebagai berikut: [\[GRI 418-1\]](#)

1. Data dan/atau Informasi pribadi Konsumen adalah data dan/atau informasi yang mencakup:
 - Perseorangan
 - Nama
 - Alamat
 - Tanggal lahir dan/atau umur
 - Nomor telepon
 - Nama Ibu Kandung

Bank Raya already has a policy governing the protection of customer data in place through Circular No. 04/Dir.01.05/DCM/02/2017 on Consumer Protection and the Consumer Services Code of Ethics. The Bank assures the confidentiality of client data in the letter. Bank Raya prohibits its employees from disclosing the following information: [\[GRI 418-1\]](#)

1. Consumer's personal data and/or information is data and/or information which includes:
 - Individual
 - Name
 - Address
 - Date of birth and/or age
 - Phone number
 - Mother's Name

2. Korporasi

- Nama
- Alamat
- Nomor telepon
- Susunan Direksi dan Dewan Komisaris termasuk dokumen identitas berupa Ktp/ paspor/Izin tinggal
- Susunan pemegang Saham

2. Corporation

- Name
- Address
- Phone number
- The composition of the Board of Directors and the Board of Commissioners including identity documents in the form of ID card/passport/residence permit
- Composition of Shareholders

Survey Kepuasan Nasabah [F.30] Customer Satisfaction Survey [F.30]

Nasabah merupakan salah satu pemangku kepentingan utama bagi Bank Raya. Keberadaan mereka sangat menentukan keberlangsungan perusahaan. Dalam memberikan layanan, Bank berkomitmen untuk memberikan yang terbaik dan memperlakukan semua nasabah secara setara. Komitmen Bank untuk memelihara kepercayaan nasabah seperti tersebut di atas merupakan implementasi pasal 28, Undang Undang No.10 Tahun 1998 tentang Perbankan.

Bank Raya's primary shareholder is its customers. Their continued existence will determine the company's viability. The Bank is dedicated to offering the highest quality services and to treating all clients fairly. As noted before, the Bank's commitment to maintaining customer confidence is in accordance with Article 28 of the Banking Law No. 10 of 1998.

Survei Survey	2020	2021
Survei Kepuasan Nasabah	Sebanyak 95 % responden puas terhadap Kualitas Layanan <i>Frontliner</i>	Sebanyak 89% responden puas dengan Produk dan Pelayanan
Customer Satisfaction Survey	As many as 95% of respondents are satisfied with Frontliner Service Quality	As many as 89% of respondents are satisfied with the Products and Services

Kepatuhan Sosial Ekonomi Socio-Economic Compliance

Sebagai perusahaan yang menjunjung tinggi hukum, Bank Raya senantiasa mematuhi segala peraturan dan ketentuan yang berlaku termasuk di bidang sosial dan ekonomi. Hal ini bertujuan untuk menjaga eksistensi Bank agar kegiatan bisnis dapat berjalan dengan lancar tanpa ada sandungan hukum. [GRI 103-1]

Kepatuhan sosial ekonomi berhubungan dengan karyawan, nasabah, masyarakat, serta pemerintah. Sehubungan dengan karyawan, Bank Raya telah memenuhi segala peraturan ketenagakerjaan yang disusun Undang-Undang Ketenagakerjaan baik mengenai jam kerja, pengupahan, tunjangan, dan remunerasi. Selanjutnya dalam hubungannya dengan nasabah, Bank Raya telah mengupayakan untuk memberikan pelayanan terbaik dengan memberikan informasi produk yang benar dan tepat, memberikan pelayanan prima, menjaga

Bank Raya, as a law-abiding corporation, constantly complies with all existing laws and regulations, including those governing social and economic matters. This seeks to ensure the Bank's continued existence so that economic activity may continue without legal impediments. [GRI 103-1]

Kepatuhan sosial ekonomi berhubungan dengan karyawan, nasabah, masyarakat, serta pemerintah. Bank Raya has complied with all labour standards established by the Manpower Act, including those governing working hours, pay, benefits, and compensation. Additionally, Bank Raya has attempted to deliver the finest service possible to its consumers by providing accurate and relevant product information, giving exceptional service, protecting customer privacy, and providing complaint channels. Meanwhile, Bank Raya is committed

privasi nasabah, serta menyediakan saluran pengaduan. Sedangkan dalam hubungannya dengan masyarakat, Bank Raya memastikan bahwa tidak terdapat hak-hak masyarakat yang dilanggar dan aktivitas Bank berkontribusi untuk masyarakat. Terakhir sehubungan dengan pemerintah, Bank Raya telah taat terhadap peraturan dan ketentuan pemerintah dan regulator. [GRI 103-2]

Selama tahun 2021, tidak terdapat kasus atau kejadian yang melanggar kepatuhan sosial ekonomi yang dilakukan Bank sehingga tidak ada denda, sanksi non-moneter, serta tuntutan hukum berkaitan dengan pelanggaran aspek sosial dan ekonomi. [GRI 103-3, GRI 419-1]

to ensuring that no community rights are harmed and that the Bank's actions benefit the community. Finally, in terms of the government, Bank Raya has adhered to all applicable government and regulatory norms and regulations. [GRI 103-2]

During 2021, no instances or occurrences breached the Bank's socioeconomic compliance, resulting in no fines, non-monetary punishments, or litigation relating to social and economic compliance breaches. [GRI 103-3, GRI 419-1]

Lembar Umpan Balik

Feedback Sheet

Terima kasih atas kesediaan Bapak/Ibu/Saudara untuk membaca Laporan Keberlanjutan 2021 ini. Guna meningkatkan Laporan Keberlanjutan pada tahun-tahun mendatang kami berharap kesediaan Bapak/Ibu/Saudara untuk mengisi Lembar Umpan Balik yang telah disiapkan, dan mengirimkannya kembali kepada kami.

We appreciate your taking the time to read our 2021 Sustainability Report. To help us enhance the Sustainability Report in the following years, we hope you would complete and return the Feedback Sheet that has been produced.

1. Laporan Keberlanjutan ini telah memberikan informasi mengenai berbagai hal yang telah dilaksanakan PT Bank Raya Indonesia Tbk dalam pemenuhan tanggung jawab sosial perusahaan.

This Sustainability Report details the many initiatives taken by PT Bank Raya Indonesia Tbk to satisfy its corporate social responsibility.

☐ Setuju/Agree ☐ Tidak Setuju/Disagree ☐ Tidak Tahu/Do not know

2. Materi dalam Laporan Keberlanjutan ini termasuk data dan informasi yang disajikan mudah dimengerti dan dipahami.

The content of this Sustainability Report, including statistics and information, is straightforward and simple to comprehend.

☐ Setuju/Agree ☐ Tidak Setuju/Disagree ☐ Tidak Tahu/Do not know

3. Materi dalam Laporan Keberlanjutan ini, termasuk data dan informasi yang disajikan sudah cukup lengkap.

This Sustainability Report's content, including the statistics and information offered, is fairly comprehensive.

☐ Setuju/Agree ☐ Tidak Setuju/Disagree ☐ Tidak Tahu/Do not know

4. Materi dalam Laporan Keberlanjutan ini, termasuk data dan informasi yang disajikan dapat dipertanggungjawabkan kebenarannya.

This Sustainability Report's content, including the statistics and information offered, is justifiable.

☐ Setuju/Agree ☐ Tidak Setuju/Disagree ☐ Tidak Tahu/Do not know

5. Bagaimana dengan tampilan Laporan Keberlanjutan ini, baik dari isi, desain dan tata letak, serta foto-foto?

How does this Sustainability Report seem, both in terms of content, style and layout, as well as photographs?

☐ Setuju/Agree ☐ Tidak Setuju/Disagree ☐ Tidak Tahu/Do not know

6. Informasi apa saja yang dirasakan bermanfaat dari Laporan Keberlanjutan ini?

Which sections of this Sustainability Report do you find most useful?

.....

7. Informasi apa saja yang dirasakan kurang bermanfaat dari Laporan Keberlanjutan ini?

Which sections of this Sustainability Report do you find less useful?

.....

8. Informasi apa saja yang dirasakan kurang dan harus dilengkapi dalam Laporan Keberlanjutan mendatang?

What information do you believe is missing from a future Sustainability Report?

.....

Profil Anda Your profile

Nama Lengkap :
Full name

Institusi/Perusahaan :
Institution/Company

Email :

Identifikasi Pemangku : Pemerintah/LSM/Masyarakat/Government/NGOs/Communities
Identification of Stakeholders

Lain-lain :
Others

Kepentingan :
Interest

(pilih salah satu/select one)

Mohon formulir ini dapat dikirimkan kembali kepada:
PT Bank Raya Indonesia Tbk
Desk Enterprise Risk Manajemen
Gedung Bank Raya
Jl. Warung Jati Barat No. 139 Jakarta 12740
Telp. 021-8066 -76-00 (Hunting)/021-7919-99-80 (Hunting)
Fax. 021-7919-99-50

Please send this form back to:
PT Bank Raya Indonesia Tbk
Desk Enterprise Risk Management
Gedung Bank Raya
Jl. Warung Jati Barat No. 139 Jakarta 12740
Telp. 021-8066 -76-00 (Hunting)/021-7919-99-80 (Hunting)
Fax. 021-7919-99-50



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LAPORAN KEUANGAN FINANCIAL REPORT





PT Bank Raya Indonesia Tbk
(dahulu/*formerly*
PT Bank Rakyat Indonesia Agroniaga Tbk)

Laporan keuangan tanggal 31 Desember 2021 dan
untuk tahun yang berakhir pada tanggal tersebut
beserta laporan auditor independen/
*Financial statements as of December 31, 2021 and
for the year ended with independent auditors' report*

The original financial statements included herein are in the Indonesian language.

**PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2021
DAN UNTUK TAHUN YANG BERAKHIR PADA
TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN**

**PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2021
AND FOR THE YEAR
THEN ENDED
WITH INDEPENDENT AUDITORS' REPORT**

Daftar Isi	Halaman/ Pages	Table of Contents
Surat Pernyataan Direksi		<i>Statement of Directors</i>
Laporan Auditor Independen		<i>Independent Auditors' Report</i>
Laporan Posisi Keuangan	1 - 3	<i>Statement of Financial Position</i>
Laporan Laba Rugi dan Penghasilan Komprehensif Lain	4 - 5	<i>Statement of Profit or Loss and Other Comprehensive Income</i>
Laporan Perubahan Ekuitas	6	<i>Statement of Changes in Equity</i>
Laporan Arus Kas	7 - 8	<i>Statement of Cash Flows</i>
Catatan Atas Laporan Keuangan	9 - 234	<i>Notes to the Financial Statements</i>

**SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB
ATAS LAPORAN KEUANGAN AUDITAN
TANGGAL 31 DESEMBER 2021 DAN 2020
DAN UNTUK TAHUN YANG BERAKHIR
PADA TANGGAL TERSEBUT
PT BANK RAYA INDONESIA Tbk**

**BOARD OF DIRECTOR'S STATEMENT
REGARDING THE RESPONSIBILITY
FOR THE AUDITED FINANCIAL
STATEMENTS AS OF DECEMBER 31, 2021
AND 2020 AND FOR THE YEARS ENDED
PT BANK RAYA INDONESIA Tbk**

Kami yang bertanda tangan dibawah ini :

We, the undersigned below:

Nama **Kaspar Situmorang**
Alamat Kantor Gedung Raya, Lt. 5, Jl. Warung Jati Barat No. 139,
Jakarta Selatan 12740
Alamat Domisili Jalan Mesjid Nur III No. 11 RT 010 RW 001
Kebayoran Lama, Jakarta Selatan, DKI Jakarta
Nomor Telepon 021-79199980/021-80667600
Jabatan Direktur Utama / President Director

Name
Office Address
Residential Address
Telephone
Title

Nama **Arif Wicaksono**
Alamat Kantor Gedung Raya, Lt. 5, Jl. Warung Jati Barat No. 139,
Jakarta Selatan 12740
Alamat Domisili Komp. BRI Jl. Kremuna No.6 RT.007, RW.006,
Cipete Selatan, Cilandak, Jakarta Selatan
Nomor Telepon 021-79199980/021-80667600
Jabatan Direktur Keuangan dan Operasional / Finance and
Operation Director

Name
Office Address
Residential Address
Telephone
Title

Menyatakan bahwa :

Declare that :

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Raya Indonesia Tbk (Bank);
2. Laporan keuangan Bank telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;
3. a. Semua informasi dalam laporan keuangan Bank telah diungkapkan secara lengkap dan benar;
b. Laporan keuangan Bank tidak mengandung informasi atau fakta material yang tidak benar dan tidak menghilangkan informasi atau fakta material;
4. Kami bertanggung jawab atas sistem pengendalian internal Bank.

1. We are responsible for the preparation and the presentation of the financial statements of PT Bank Raya Indonesia Tbk (Bank);
2. The Bank's financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards;
3. a. All information in the Bank's financial statements has been fully and correctly disclosed;
b. The Bank's financial statements do not contain any material incorrect information or facts, nor do they omit material information or facts;
4. We are responsible for the Bank's internal control system.

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement has been made truthfully.

Jakarta, 28 Maret 2022 / March 28, 2022

Atas nama dan mewakili Direksi / For and on behalf of Board of Directors

Kaspar Situmorang
Direktur Utama /
President Director

Arif Wicaksono
Direktur Keuangan dan Operasional /
Finance and Operation Director

*The original report included herein is in the
Indonesian language.*

Laporan Auditor Independen

Laporan No. 00330/2.1032/AU.1/07/1681-
2/1/III/2022

**Pemegang Saham, Dewan Komisaris
dan Direksi
PT Bank Raya Indonesia Tbk (dahulu PT Bank
Rakyat Indonesia Agroniaga Tbk)**

Kami telah mengaudit laporan keuangan PT Bank Raya Indonesia Tbk (dahulu PT Bank Rakyat Indonesia Agroniaga Tbk) terlampir, yang terdiri dari laporan posisi keuangan tanggal 31 Desember 2021, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas, dan laporan arus kas untuk tahun yang berakhir pada tanggal tersebut, dan suatu ikhtisar kebijakan akuntansi signifikan dan informasi penjelasan lainnya.

Tanggung jawab manajemen atas 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.

Tanggung jawab auditor

Tanggung jawab kami adalah untuk menyatakan suatu opini atas laporan keuangan tersebut berdasarkan audit kami. Kami melaksanakan audit kami berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia. Standar tersebut mengharuskan kami untuk mematuhi ketentuan etika serta merencanakan dan melaksanakan audit untuk memperoleh keyakinan memadai tentang apakah laporan keuangan tersebut bebas dari kesalahan penyajian material.

Independent Auditors' Report

Report No. 00330/2.1032/AU.1/07/1681-
2/1/III/2022

**The Shareholders, the Board of Commissioners
and the Board of Directors
PT Bank Raya Indonesia Tbk (formerly PT Bank
Rakyat Indonesia Agroniaga Tbk)**

We have audited the accompanying financial statements of PT Bank Raya Indonesia Tbk (formerly PT Bank Rakyat Indonesia Agroniaga Tbk), which comprise the statement of financial position as of December 31, 2021 and the statements of profit or loss and other comprehensive income, changes in equity, and cash flows for the year then ended, and a summary of significant accounting policies and other explanatory information.

Management's responsibility for the financial statements

Management is responsible for the preparation and fair presentation of such 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.

Auditors' responsibility

Our responsibility is to express an opinion on such financial statements based on our audit. We conducted our audit in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether such financial statements are free from material misstatement.

The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Laporan No. 00330/2.1032/AU.1/07/1681-2/1/III/2022 (lanjutan)

Tanggung jawab auditor (lanjutan)

Suatu audit melibatkan pelaksanaan prosedur untuk memperoleh bukti audit tentang angka-angka dan pengungkapan dalam laporan keuangan. Prosedur yang dipilih bergantung pada pertimbangan auditor, termasuk penilaian atas risiko kesalahan penyajian material dalam laporan keuangan, baik yang disebabkan oleh kecurangan maupun kesalahan. Dalam melakukan penilaian risiko tersebut, auditor mempertimbangkan pengendalian internal yang relevan dengan penyusunan dan penyajian wajar laporan keuangan entitas untuk merancang prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektifitasan pengendalian internal entitas. Suatu audit juga mencakup pengevaluasian atas ketepatan kebijakan akuntansi yang digunakan dan kewajaran estimasi akuntansi yang dibuat oleh manajemen, serta pengevaluasian atas penyajian laporan keuangan secara keseluruhan.

Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini audit kami.

Opini

Menurut opini kami, laporan keuangan terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan PT Bank Raya Indonesia Tbk (dahulu PT Bank Rakyat Indonesia Agroniaga Tbk) tanggal 31 Desember 2021, serta kinerja keuangan dan arus kasnya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Independent Auditors' Report (continued)

Report No. 00330/2.1032/AU.1/07/1681-2/1/III/2022 (continued)

Auditors' responsibility (continued)

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditors consider internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of PT Bank Raya Indonesia Tbk (formerly PT Bank Rakyat Indonesia Agroniaga Tbk) as of December 31, 2021, and its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

Purwantono, Sungkoro & Surja



Christophorus Alvin Kossim

Registrasi Akuntan Publik No. AP. 1681/Public Accountant Registration No. AP. 1681

28 Maret 2022/March 28, 2022



00330

The original financial statements included herein are in the Indonesian language.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2021
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
STATEMENT OF FINANCIAL POSITION
As of December 31, 2021
(Expressed in thousands of Rupiah,
unless otherwise stated)

ASET	31 Desember/ December 31, 2021	Catatan/ Notes	31 Desember/ December 31, 2020	ASSETS
Kas	15.238.603	2a,2b,2z,3	14.075.297	Cash
Giro pada Bank Indonesia	557.506.779	2a,2b,2e, 2z,4	756.177.533	Current accounts with Bank Indonesia
Giro pada bank lain	192.794.815	2a,2b,2c,2d, 2e,2z,5,35	332.095.870	Current accounts with other banks
Cadangan kerugian penurunan nilai	(137.437)		(380.595)	Allowance for impairment losses
	192.657.378		331.715.275	
Penempatan pada Bank Indonesia dan bank lain	1.374.726.979	2a,2b,2c,2d, 2f,2z,6,35	1.516.959.428	Placements with Bank Indonesia and other banks
Cadangan kerugian penurunan nilai	-		(621.602)	Allowance for impairment losses
	1.374.726.979		1.516.337.826	
Efek-efek	3.495.511.610	2b,2c,2d, 2g,2z,7,35	3.366.820.756	Securities
Cadangan kerugian penurunan nilai	(3.654.228)		(6.079.579)	Allowance for impairment losses
	3.491.857.382		3.360.741.177	
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	2b,2d,2h,8	3.047.732.345	Securities purchased under agreement to resell
Tagihan lainnya	-	2b,2d,2j,9	23.745.047	Other receivables
Cadangan kerugian penurunan nilai	-		(37.118)	Allowance for impairment losses
	-		23.707.929	
Tagihan akseptasi	92.561.485	2b,2d,2k,2z 10	-	Acceptances receivable
Cadangan kerugian penurunan nilai	(112.202)		-	Allowance for impairment losses
	92.449.283		-	
Kredit yang diberikan	11.608.327.398	2b,2c,2d, 2i,2z,11,35	19.491.933.792	Loans
Cadangan kerugian penurunan nilai	(1.875.401.843)		(1.006.365.249)	Allowance for impairment losses
	9.732.925.555		18.485.568.543	
Penyertaan saham	77.510	2b,2d,2l, 12	297.658	Investment in shares of stocks
Aset tetap		2m,2n,13		Premises and equipments
Biaya perolehan	406.039.916		388.031.142	Cost
Akumulasi penyusutan	(121.670.024)		(118.907.448)	Accumulated depreciation
Nilai buku neto	284.369.892		269.123.694	Net book value
Aset tak berwujud - neto	5.755.738	2m,2n,13	8.314.375	Intangible assets - net

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.

The original financial statements included herein are in the Indonesian language.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2021
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2021
(Expressed in thousands of Rupiah,
unless otherwise stated)

	31 Desember/ December 31, 2021	Catatan/ Notes	31 Desember/ December 31, 2020	
ASET (lanjutan)				ASSETS (continued)
Aset pajak tangguhan	371.739.430	2aa,21c	94.378.701	Deferred tax assets
Agunan yang diambil alih	6.043.700	2n,2o,	8.288.727	Foreclosed collaterals
Cadangan kerugian penurunan nilai	(1.613.050)	14	(379.971)	Allowance for impairment losses
	4.430.650		7.908.756	
Biaya dibayar dimuka dan aset lain-lain	92.409.663	2b,2n,2p, 2z,15	99.413.153	Prepaid expenses and other assets
TOTAL ASET	16.866.522.655		28.015.492.262	TOTAL ASSETS
LIABILITAS DAN EKUITAS				LIABILITIES AND EQUITY
LIABILITAS				LIABILITIES
Liabilitas segera	9.926.302	2b,2q,2z,16	15.813.208	Liabilities due immediately
Simpanan nasabah		2b,2c,2r, 2z,35		Deposits from customers
Giro	2.050.927.643	17	3.752.094.114	Demand deposits
Tabungan	3.022.638.502	18	1.733.308.272	Saving deposits
Deposito berjangka	8.422.725.583	19	17.509.876.360	Time deposits
	13.496.291.728		22.995.278.746	
Simpanan dari bank lain	301.307.301	2b,2c,2r, 2z,20,35	213.162.997	Deposits from other banks
Liabilitas akseptasi	92.561.485	2b,2k,2z,10	-	Acceptance payables
Utang pajak	12.651.982	2aa,21a	25.345.453	Taxes payable
Surat berharga yang diterbitkan	238.862.928	2b,2s,22	238.615.701	Marketable securities issued
Pinjaman yang diterima	16.517.311	2b,2c,2t 23,35	17.318.944	Fund borrowings
Estimasi kerugian komitmen dan kontinjensi	28.247.973	2c,2d,2z 24,35	11.079.292	Estimated losses on commitment and contingencies
Liabilitas imbalan kerja	60.061.924	2c,2x, 25,35	46.374.717	Liabilities for employee benefits
Liabilitas lain-lain	152.430.542	2b,2u,2z,26	164.812.993	Other liabilities
Total Liabilitas	14.408.859.476		23.727.802.051	Total 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.

The original financial statements included herein are in the Indonesian language.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2021
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2021
(Expressed in thousands of Rupiah,
unless otherwise stated)

	31 Desember/ December 31, 2021	Catatan/ Notes	31 Desember/ December 31, 2020	
LIABILITAS DAN EKUITAS (lanjutan)				LIABILITIES AND EQUITY (continued)
EKUITAS				EQUITY
Modal saham - nilai nominal Rp100 (Rupiah penuh) per lembar saham				Share capital - par value of Rp100 (full Rupiah) per share
Modal dasar - 60.000.000.000 lembar saham				Authorized capital - 60,000,000,000 shares
Modal ditempatkan dan disetor penuh - 22.746.526.712 lembar saham pada tanggal 31 Desember 2021 dan 21.343.290.230 lembar saham pada tanggal 31 Desember 2020	2.274.652.671	1,27	2.134.329.023	Issued and fully paid capital - 22,746,526,712 shares as of December 31, 2021 and 21,343,290,230 shares as of December 31, 2020
Tambahan modal disetor	2.943.713.773	27	1.827.438.716	Additional paid-in capital
Opsi saham	81.544	2ad,27	16.774.476	Shares option
Keuntungan yang belum direalisasi atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tangguhan	54.065.680	2g	69.500.750	Unrealized gain on securities measured at fair value through other comprehensive income - net of deferred tax
Cadangan kerugian penurunan nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	87.229	2d,2g,7	1.596.496	Allowance for impairment losses on securities measured at fair value through other comprehensive income
Pengukuran kembali program imbalan pasti - setelah pajak tangguhan	(3.602.953)	2x,25	3.684.108	Remeasurement of defined benefit plan - net of deferred tax
Saldo laba				Retained earnings
Telah ditentukan penggunaannya:				Appropriated:
Cadangan khusus	116.559	27	116.559	Specific reserve
Cadangan umum	32.254.317	27	30.691.283	General reserve
Belum ditentukan penggunaannya	(2.843.705.641)		203.558.800	Unappropriated
Total Ekuitas	2.457.663.179		4.287.690.211	Total Equity
TOTAL LIABILITAS DAN EKUITAS	16.866.522.655		28.015.492.262	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.

The original financial statements included herein are in the Indonesian language.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN LABA RUGI DAN PENGHASILAN
KOMPREHENSIF LAIN
Untuk Tahun yang Berakhir pada Tanggal
31 Desember 2021
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
STATEMENT OF PROFIT OR LOSS AND OTHER
COMPREHENSIVE INCOME
For the Year Ended
December 31, 2021
(Expressed in thousands of Rupiah,
unless otherwise stated)

Tahun yang Berakhir pada Tanggal 31 Desember/ Year Ended December 31,			
	2021	Catatan/ Notes	2020
PENDAPATAN DAN BEBAN OPERASIONAL			
Pendapatan bunga	1.647.185.044	2v,28	1.931.524.786
Beban bunga	(773.616.493)	2v,29	(1.306.889.194)
Pendapatan Bunga - Neto	873.568.551		624.635.592
Pendapatan Operasional Lainnya			
Provisi dan komisi lainnya	21.580.289	2w	17.978.073
Keuntungan dari penjualan efek-efek - neto	33.943.001	2g,7g	35.555.901
Penerimaan kembali aset keuangan yang telah dihapusbukukan	51.820.358	2d	10.275.435
Keuntungan yang belum direalisasi dari perubahan nilai wajar efek-efek - neto	644.000	2g,7f	6.678.710
Keuntungan transaksi mata uang asing - neto	1.704.481	2z	-
Lain-lain	1.062.715		859.588
Total Pendapatan Operasional Lainnya	110.754.844		71.347.707
Penyisihan Kerugian Penurunan Nilai	(3.885.062.216)	2d,2n,30	(322.513.041)
Beban Operasional Lainnya			
Beban gaji dan tunjangan	(235.183.519)	2c,2x,25	(197.468.117)
Beban umum dan administrasi	(165.576.407)	31,35	(115.346.440)
Kerugian transaksi mata uang asing - neto	-	2m,32	(1.469.968)
Lain-lain	(1.977.552)	2z	(1.535.492)
Total Beban Operasional Lainnya	(402.737.478)		(315.820.017)
(RUGI) LABA OPERASIONAL	(3.303.476.299)		57.650.241
PENDAPATAN NON-OPERASIONAL - NETO	344.951	33	6.421.516
(RUGI) LABA SEBELUM PAJAK	(3.303.131.348)		64.071.757
MANFAAT (BEBAN) PAJAK	257.429.941	2aa,21b	(32.811.075)
(RUGI) LABA TAHUN BERJALAN	(3.045.701.407)		31.260.682

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.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN LABA RUGI DAN PENGHASILAN
KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun yang Berakhir pada Tanggal
31 Desember 2021
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
STATEMENT OF PROFIT OR LOSS AND
OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended
December 31, 2021
(Expressed in thousands of Rupiah,
unless otherwise stated)

Tahun yang Berakhir pada Tanggal 31 Desember/ Year Ended December 31,				
	2021	Catatan/ Notes	2020	
PENGHASILAN KOMPREHENSIF LAINNYA				OTHER COMPREHENSIVE INCOME
Akun yang tidak akan direklasifikasi ke laba rugi				Item that will not be reclassified to profit or loss
Pengukuran kembali atas program imbalan pasti	(9.342.386)	2x,25	(601.318)	Remeasurement of defined benefit plan
Pajak penghasilan terkait akun yang tidak akan direklasifikasi ke laba rugi	2.055.325		292.026	Income tax related to item not to be reclassified to profit or loss
Akun yang akan direklasifikasi ke laba rugi				Item that will be reclassified to profit or loss
(Kerugian) keuntungan yang belum direalisasi atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(19.788.551)	2g	110.123.928	Unrealized (loss) gain on securities measured at fair value through other comprehensive income
Cadangan kerugian penurunan nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(1.509.267)	2d,2g	988.586	Allowance for impairment losses on securities measured at fair value through other comprehensive income
Pajak penghasilan terkait akun yang akan direklasifikasi ke laba rugi	4.353.481		(24.857.876)	Income tax related to item to be reclassified to profit or loss
PENGHASILAN KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK	(24.231.398)		85.945.346	OTHER COMPREHENSIVE INCOME FOR THE YEAR AFTER TAX
TOTAL PENGHASILAN KOMPREHENSIF TAHUN BERJALAN	(3.069.932.805)		117.206.028	TOTAL COMPREHENSIVE INCOME FOR THE YEAR
LABA TAHUN BERJALAN PER SAHAM		2y,34		EARNINGS PER SHARE
Dasar (dalam Rupiah penuh)	(141,52)		1,46	Basic (in full Rupiah)
Dilusan (dalam Rupiah penuh)	(141,51)		1,46	Diluted (in full Rupiah)

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.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA AGRONIAGA Tbk)
LAPORAN PERUBAHAN EKUITAS
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2021
(Disajikan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA AGRONIAGA Tbk)
STATEMENT OF CHANGES IN EQUITY
For the Year Ended December 31, 2021
(Expressed in thousands of Rupiah, unless otherwise stated)

Catatan/ Notes	Modal ditempatkan dan disetor penuh/ Issued and fully paid capital	Tambahan modal disetor/ Additional paid-in capital	Opsi saham/ Shares option	Keuntungan yang belum direalisasi atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain atau efek-efek yang tersedia untuk dijual - setelah pajak tangguhan/ Unrealized gain on securities measured at fair value through other comprehensive income or available-for-sale securities - net of deferred tax	Cadangan kerugian penurunan nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain/ Allowance for impairment losses on securities measured at fair value through other comprehensive income	Pengukuran kembali program imbalan pasti - setelah pajak tangguhan/ Remeasurement of defined benefit plan - net of deferred tax	Saldo laba/Retained earnings		Ekuitas/Equity		
							Telah ditentukan penggunaannya/ Appropriated	Belum ditentukan penggunaannya/ Unappropriated			
										Cadangan khusus/ Specific reserve	Cadangan umum/ General reserve
Saldo pada tanggal 31 Desember 2019	2.134.329.023	1.825.177.644	12.575.329	(15.765.302)	-	3.993.400	116.559	28.138.212	493.139.354	4.481.704.219	
Dampak penyesuaian atas penerapan PSAK 71	-	-	-	-	607.910	-	-	-	(318.288.165)	(317.680.255)	
Saldo pada tanggal 1 Januari 2020 setelah penyesuaian	2.134.329.023	1.825.177.644	12.575.329	(15.765.302)	607.910	3.993.400	116.559	28.138.212	174.851.189	4.164.023.964	
Laba tahun berjalan	-	-	-	-	-	-	-	-	31.260.682	31.260.682	
Penghasilan komprehensif lainnya	-	-	-	85.266.052	988.586	(309.292)	-	-	-	85.945.346	
Total penghasilan komprehensif untuk tahun berjalan	-	-	-	85.266.052	988.586	(309.292)	-	-	31.260.682	117.206.028	
Opsi saham	-	2.261.072	4.199.147	-	-	-	-	-	-	6.460.219	
Pembagian laba	-	-	-	-	-	-	-	2.553.071	(2.553.071)	-	
Penambahan cadangan umum	-	-	-	-	-	-	-	-	-	-	
Saldo pada tanggal 31 Desember 2020	2.134.329.023	1.827.438.716	16.774.476	69.500.750	1.596.496	3.684.108	116.559	30.691.283	203.558.800	4.287.690.211	
Rugi periode berjalan	-	-	-	-	(1.509.267)	(7.287.061)	-	-	(3.045.701.407)	(3.045.701.407)	
Penghasilan komprehensif lainnya	-	-	-	(15.435.070)	(1.509.267)	(7.287.061)	-	-	-	(24.231.398)	
Total penghasilan komprehensif untuk periode berjalan	-	-	-	(15.435.070)	(1.509.267)	(7.287.061)	-	-	(3.045.701.407)	(3.069.932.805)	
Penerbitan saham	140.323.648	1.099.226.550	-	-	-	-	-	-	-	1.239.550.198	
Opsi saham	-	17.048.507	(16.692.932)	-	-	-	-	-	-	355.575	
Pembagian laba	-	-	-	-	-	-	-	1.563.034	(1.563.034)	-	
Penambahan cadangan umum	-	-	-	-	-	-	-	-	-	-	
Saldo pada tanggal 31 Desember 2021	2.274.652.671	2.943.713.773	81.544	54.065.680	87.229	(3.602.953)	116.559	32.254.317	(2.843.705.641)	2.457.663.179	

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.

PT BANK RAYA INDONESIA Tbk
(dahulu PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
LAPORAN ARUS KAS
Untuk Tahun yang Berakhir pada Tanggal
31 Desember 2021
(Disajikan dalam ribuan Rupiah,
kecuali dinyatakan lain)

PT BANK RAYA INDONESIA Tbk
(formerly PT BANK RAKYAT INDONESIA
AGRONIAGA Tbk)
STATEMENT OF CASH FLOWS
For the Year Ended
December 31, 2021
(Expressed in thousands of Rupiah,
unless otherwise stated)

Tahun yang Berakhir pada Tanggal 31 Desember/ Year Ended December 31,			
	2021	Catatan/ Notes	2020
ARUS KAS DARI AKTIVITAS OPERASI			CASH FLOWS FROM OPERATING ACTIVITIES
Penerimaan bunga, provisi dan komisi	1.646.967.200		1.912.472.743 <i>Interest, fees and commissions received</i>
Pembayaran bunga, provisi dan komisi	(815.960.281)		(1.319.247.854) <i>Interest, fees and commissions paid</i>
Penerimaan kembali aset keuangan yang telah dihapusbukukan	126.956.934		40.371.567 <i>Recoveries of financial assets written-off</i>
Pendapatan operasional lainnya	56.564.960		51.879.970 <i>Other operating income</i>
Pembayaran pajak tahun berjalan	(17.091.677)		(14.051.730) <i>Payment of current year tax</i>
Beban operasional lainnya	(319.540.449)		(259.028.126) <i>Other operating expenses</i>
(Beban) pendapatan non operasional - neto	(9.577.872)		3.706.522 <i>Non-operating (expense) income - net</i>
Arus kas sebelum perubahan dalam aset dan liabilitas operasi	668.300.815		416.103.092 <i>Cash flows before changes in operating assets and liabilities</i>
Perubahan dalam aset dan liabilitas operasi:			<i>Changes in operating assets and liabilities:</i>
Penurunan (kenaikan) dalam aset operasi:			<i>Decrease (increase) in operating assets:</i>
Kredit yang diberikan	4.807.917.960		(711.306.956) <i>Loans</i>
Efek-efek yang diukur pada nilai wajar melalui laba rugi	392.030.000		528.712.846 <i>Securities at fair value through profit or loss</i>
Efek-efek yang dibeli dengan janji dijual kembali	2.397.354.532		(778.751.827) <i>Securities purchased under agreement to resell</i>
Tagihan lainnya	23.745.047		(23.745.047) <i>Other receivables</i>
Aset lain-lain	9.354.875		(24.063.260) <i>Other assets</i>
(Penurunan) kenaikan dalam liabilitas operasi:			<i>Increase (decrease) in operating liabilities:</i>
Liabilitas segera	(5.886.906)		3.580.158 <i>Liabilities due immediately</i>
Giro	(1.701.166.471)		1.823.090.961 <i>Demand deposits</i>
Tabungan	1.289.330.230		637.008.389 <i>Savings deposits</i>
Deposito Berjangka	(9.087.150.777)		(609.421.938) <i>Time deposits</i>
Simpanan dari bank lain	88.144.304		(531.691.584) <i>Deposits from other banks</i>
Liabilitas lain-lain	(21.616.929)		33.517.618 <i>Other liabilities</i>
Kas Neto (Digunakan untuk Diperoleh dari Aktivitas Operasi)	(1.139.643.320)		763.032.452 Net Cash (Used in) Provided by Operating Activities
ARUS KAS DARI AKTIVITAS INVESTASI			CASH FLOWS FROM INVESTING ACTIVITIES
Kenaikan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan diamortisasi	(539.842.038)		(258.550.152) <i>Increase in securities measured at fair value through other comprehensive income and securities measured at amortized cost</i>
Hasil penjualan aset tetap	785.099	13	5.751 <i>Proceeds from sale of premises and equipment</i>

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.

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Tahun yang Berakhir pada Tanggal 31 Desember/ Year Ended December 31,			
2021	Catatan/ Notes	2020	
ARUS KAS DARI AKTIVITAS INVESTASI (lanjutan)			CASH FLOWS FROM INVESTING ACTIVITIES (continued)
Perolehan aset tetap	(39.348.452)	13	(7.178.772)
Perolehan aset tak berwujud	-	13	(5.339.027)
Hasil penjualan penyertaan saham	220.148		-
Penerimaan dividen	39.045	12	27.954
Kas Neto Digunakan untuk Aktivitas Investasi	(578.146.197)		(271.034.246)
ARUS KAS DARI AKTIVITAS PENDANAAN			CASH FLOWS FROM FINANCING ACTIVITIES
Pembayaran surat berharga yang diterbitkan yang jatuh tempo	-	22	(261.000.000)
Penerimaan dari penerbitan saham	140.323.648		-
Penambahan modal disetor (Pembayaran) penerimaan pinjaman yang diterima	1.099.226.550		-
	(801.633)	23	17.318.944
Kas Neto Diperoleh dari (Digunakan untuk) Pendanaan	1.238.748.565		(243.681.056)
(PENURUNAN) KENAIKAN NETO KAS DAN SETARA KAS	(479.040.952)		248.317.150
KAS DAN SETARA KAS AWAL TAHUN	2.619.308.128		2.370.990.978
KAS DAN SETARA KAS AKHIR TAHUN	2.140.267.176		2.619.308.128
Kas dan Setara Kas akhir tahun terdiri dari:			Cash and Cash Equivalents at end of year consist of:
Kas	15.238.603	3	14.075.297
Giro pada Bank Indonesia	557.506.779	4	756.177.533
Giro pada bank lain	192.794.815	5	332.095.870
Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan	1.374.726.979	6	1.516.959.428
Total Kas dan Setara Kas	2.140.267.176		2.619.308.128
			CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR
			CASH AND CASH EQUIVALENTS AT END OF YEAR
			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.

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1. UMUM

a. Pendirian Bank

PT Bank Agroniaga Tbk ("Bank") didirikan dengan Akta No. 27 Notaris Raden Soekarsono, S.H., tanggal 27 September 1989. Anggaran Dasar Bank telah disahkan oleh Menteri Kehakiman Republik Indonesia dengan Surat Keputusan No. C.2-10019.HT.01.01-TH.89 tanggal 28 Oktober 1989 serta diumumkan dalam Berita Negara Republik Indonesia No. 96, Tambahan No. 3303 tanggal 1 Desember 1989.

Bank memperoleh izin usaha sebagai bank umum berdasarkan Surat Keputusan Menteri Keuangan No. 1347/KMK.013/1989 tanggal 11 Desember 1989 dan Surat Keputusan Direktur Bank Indonesia No. 22/1037/Upps/PSbD tanggal 26 Desember 1989.

Perubahan status Bank dari perseroan tertutup menjadi perseroan terbuka berdasarkan Akta Pernyataan Keputusan Rapat No. 1 tanggal 2 Desember 2002 di hadapan Notaris Siti Rayhana, S.H., dan telah mendapatkan persetujuan dari Menteri Kehakiman Republik Indonesia tanggal 24 Desember 2002, dengan Surat Keputusan No. C-24779.HT.01.04.TH.2002, serta diumumkan dalam Berita Negara Republik Indonesia No. 9, Tambahan No. 881 tanggal 31 Januari 2003.

Pada tanggal 8 Mei 2006, Bank mendapatkan izin sebagai bank devisa berdasarkan Surat Keputusan Gubernur Bank Indonesia No. 8/41/KEP.GBI/2006.

Untuk memenuhi ketentuan Undang-Undang No. 40 tahun 2007 tentang Perseroan Terbatas, Anggaran Dasar Bank telah dilakukan penyesuaian. Penyesuaian tersebut dinyatakan dalam Akta Pernyataan Keputusan Rapat No. 41 tanggal 16 Juli 2008 yang dibuat di hadapan Rusnaldy, S.H., notaris di Jakarta. Perubahan ini telah mendapatkan persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Keputusan No. AHU-46794.AH.01.02 Tahun 2008 tanggal 1 Agustus 2008 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 69, Tambahan No. 15961 tanggal 26 Agustus 2008.

1. GENERAL

a. Establishment of the Bank

PT Bank Agroniaga Tbk ("the Bank") was established by Deed No. 27 of notary Raden Soekarsono, S.H., dated September 27, 1989. The Bank's Articles of Association was approved by the Minister of Justice of the Republic of Indonesia through its Decree No. C.2-10019.HT.01.01-TH.89 dated October 28, 1989, and was published in the Supplement No. 3303 of the State Gazette of the Republic of Indonesia No. 96, dated December 1, 1989.

The Bank obtained its license as a commercial bank based on the Decision Letter of the Ministry of Finance No. 1347/KMK.013/1989 dated December 11, 1989 and the Decree of the Director of Bank Indonesia No. 22/1037/Upps/PSbD, dated December 26, 1989.

The changes in the Bank's status from a private company to a public company is based on Deed of Decision Meeting Statement No. 1, dated December 2, 2002 in the presence of Siti Rayhana, S.H., a notary, and was approved by the Minister of Justice of the Republic of Indonesia dated December 24, 2002 in its Decree No. C-24779.HT.01.04.TH.2002, and was published in the Supplement No. 881 of the State Gazette of the Republic of Indonesia No. 9, dated January 31, 2003.

On May 8, 2006, the Bank obtained a license to operate as foreign exchange bank based on the Decree of the Governor of Bank Indonesia No. 8/41/KEP.GBI/2006.

In compliance with Law No. 40 year 2007 regarding Limited Liability Company, The Bank's Articles of Association was amended. The amendment was stated in Deed of Decision Meeting Statement No. 41 dated July 16, 2008 in the presence of Rusnaldy, S.H., a notary in Jakarta. This amendment was approved by the Minister of Laws and Human Rights of the Republic of Indonesia in its Decree No. AHU-46794.AH.01.02 Year 2008 dated August 1, 2008, and was published in the Supplement No. 15961 of the State Gazette of the Republic of Indonesia No. 69, dated August 26, 2008.

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1. UMUM (lanjutan)

a. Pendirian Bank (lanjutan)

Pada tahun 2012, PT Bank Agroniaga Tbk melakukan perubahan nama menjadi PT Bank Rakyat Indonesia Agroniaga Tbk ("BRI Agro") sesuai dengan Akta Pernyataan Keputusan Rapat No. 30 tanggal 16 Mei 2012 yang dibuat dihadapan Notaris Rusnaldy, S.H., yang telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-30947.AH.01.02.Tahun 2012 tanggal 7 Juni 2012 dan Surat Keputusan Gubernur Bank Indonesia No. 14/72/KEP.GBI/2012 tanggal 10 Oktober 2012.

PT Bank Rakyat Indonesia Agroniaga Tbk melakukan perubahan nama menjadi PT Bank Raya Indonesia Tbk ("Bank Raya") sesuai dengan Akta Pernyataan Keputusan Rapat No. 24 tanggal 27 September 2021 yang dibuat dihadapan Notaris M. Nova Faisal, S.H., M.Kn. yang telah diterima dan dicatat di dalam Sistem Administrasi Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0052731.AH.01.02.TAHUN 2021 tanggal 27 September 2021 dan telah disetujui oleh Otoritas Jasa Keuangan dalam Salinan Keputusan Deputy Komisioner Pengawas Perbankan I Otoritas Jasa Keuangan No. KEP-65/PBI.1/2021 tanggal 1 November 2021 yang diterima Bank pada tanggal 5 November 2021 melalui surat Otoritas Jasa Keuangan No. S-426/PB.12/2021.

Anggaran Dasar Bank telah mengalami beberapa kali perubahan, terakhir dengan Akta Pernyataan Keputusan Rapat No. 24 tanggal 27 September 2021 yang dibuat dihadapan M. Nova Faisal, S.H., M.Kn, notaris di Jakarta, mengenai perubahan nama Bank dan penerbitan saham baru melalui penambahan modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD). Perubahan ini telah diterima dan dicatat di dalam Sistem Administrasi Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0052731.AH.01.02.TAHUN 2021 tanggal 27 September 2021.

Sesuai dengan pasal 3 Anggaran Dasar, ruang lingkup kegiatan Bank adalah menjalankan kegiatan umum di bidang perbankan.

1. GENERAL (continued)

a. Establishment of the Bank (continued)

In 2012, PT Bank Agroniaga Tbk changed its name to PT Bank Rakyat Indonesia Agroniaga Tbk ("BRI Agro") based on Deed of Decision Meeting Statement No. 30, dated May 16, 2012, in the presence of Rusnaldy, S.H., a notary, which has been approved by the Minister of Laws and Human Rights of the Republic of Indonesia in its Decree No. AHU-30947.AH.01.02.Year 2012, dated June 7, 2012 and Decree of the Governor of Bank Indonesia No. 14/72/KEP.GBI/2012, dated October 10, 2012.

PT Bank Rakyat Indonesia Agroniaga Tbk changed its name to PT Bank Raya Indonesia ("Bank Raya") based on Deed of Decision Meeting Statement No. 24, dated September 27, 2021, in the presence of M. Nova Faisal, S.H., M.Kn. a notary, that has been accepted and recorded in the Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-0052731.AH.01.02.TAHUN 2021 dated September 27, 2021 and has been approved by the Financial Services Authority in Decision of the Deputy Commissioner for Banking Supervision I of the Financial Services Authority No. KEP-65/PBI.1/2021 dated November 1, 2021 that received by the Bank on November 5, 2021 through Financial Services Authority letter No. S-425/PB.12/2021.

The Articles of Association of the Bank has been amended several times and the latest by Deed of Decision Meeting Statement No. 24, dated September 27, 2021, in the presence of M. Nova Faisal, S.H., M.Kn, a notary in Jakarta, regarding the changes of the Bank's name and the issuance of new shares through the addition of capital with Pre-emptive Rights (PMHMETD). The amendment has been accepted and recorded in the Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-0052731.AH.01.02.TAHUN 2021 dated September 27, 2021.

In accordance with article 3 of the Articles of Association, the Bank's scope of business is to conduct commercial banking activities.

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1. UMUM (lanjutan)

a. Pendirian Bank (lanjutan)

Kantor pusat Bank berlokasi di Gedung Raya, Jl. Warung Jati Barat No. 139, Jakarta. Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank memiliki kantor-kantor sebagai berikut (tidak diaudit):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Kantor Pusat Non Operasional	1	1
Kantor Cabang	12	18
Kantor Cabang Pembantu	15	20
Kantor Kas	3	4
E-Buzz	1	-

Entitas induk Bank adalah PT Bank Rakyat Indonesia (Persero) Tbk dan PT Bank Rakyat Indonesia (Persero) Tbk dimiliki oleh Pemerintah Republik Indonesia sebagai pemegang saham mayoritas.

b. Penawaran Umum Saham Bank

Pada tanggal 21 Mei 2003, Bank menyampaikan Pernyataan Pendaftaran Perusahaan Publik kepada Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan ("Bapepam-LK") di Jakarta. Berdasarkan Surat Ketua Bapepam-LK No. S-1565/PM/2003 tanggal 30 Juni 2003, Bank dinyatakan efektif menjadi perusahaan publik.

Selanjutnya Bank mencatatkan saham perdananya sebanyak 1.529.336.690 lembar saham dengan nominal Rp100 (Rupiah penuh) per lembar saham di Bursa Efek Indonesia (dahulu Bursa Efek Surabaya) pada tanggal 8 Agustus 2003, berdasarkan Surat Persetujuan Pencatatan Awal Saham Bank No. JKT-007/LIST/BES/VIII/2003 tanggal 7 Agustus 2003.

Pada tanggal 9 Oktober 2003, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas I kepada Ketua Bapepam-LK dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sebanyak 305.867.338 Saham Biasa Atas Nama dengan nilai nominal Rp100 (Rupiah penuh) setiap lembar saham. Pada tanggal 7 November 2003, Ketua Bapepam-LK melalui Surat No. S-2718/PM/2003, menyetujui pernyataan pendaftaran tersebut.

1. GENERAL (continued)

a. Establishment of the Bank (continued)

The Bank's head office is located at Raya Building, Jl. Warung Jati Barat No. 139, Jakarta. As of December 31, 2021 and 2020, the Bank has offices as follows (unaudited):

	Non-Operational Head Office
	Branch Offices
	Sub-Branch Offices
	Cash Offices
	E-Buzz

The parent entity of the Bank is PT Bank Rakyat Indonesia (Persero) Tbk whereby PT Bank Rakyat Indonesia (Persero) Tbk is owned by the Government of the Republic of Indonesia as the majority shareholder.

b. Public Offering of the Bank's Shares

On May 21, 2003, the Bank submitted a Statement of Registration for a Public Company to the Chairman of Capital Market and Financial Institution Supervisory Agency ("Bapepam-LK") in Jakarta. Based on the Letter of the Chairman of Bapepam-LK No. S-1565/PM/2003 dated June 30, 2003, the Bank stated effectively as a public company.

Subsequently, on August 8, 2003, the Bank listed its shares totaled to 1,529,336,690 shares with par value per share of Rp100 (full Rupiah) in the Indonesia Stock Exchange (formerly Surabaya Stock Exchange) based on the Approval Letter for the First Listing of the Bank's Shares No. JKT-007/LIST/BES/VIII/2003, dated August 7, 2003.

On October 9, 2003, the Bank submitted a Statement of Registration for a Limited Public Offering I to the Chairman of Bapepam-LK in accordance with the issuance of Pre-emptive Rights for 305,867,338 common shares with par value of Rp100 (full Rupiah) per share. On November 7, 2003, the Chairman of Bapepam-LK, through Letter No. S-2718/PM/2003, approved the statement of registration.

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1. UMUM (lanjutan)

c. Penawaran Umum Terbatas Saham Bank

Dari Penawaran Umum Terbatas I, Bank dapat meningkatkan jumlah modal saham sebesar Rp30.586.734.

Pada tanggal 14 Maret 2005, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas II kepada Ketua Bapepam-LK dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sebanyak 513.857.128 Saham Biasa Atas Nama dengan nilai nominal Rp100 (Rupiah penuh) setiap lembar saham. Pada tanggal 12 April 2005, Ketua Bapepam-LK melalui Surat No. S-757/PM/2005 menyetujui pernyataan pendaftaran tersebut. Dari penawaran umum terbatas II, Bank dapat meningkatkan jumlah modal saham sebesar Rp51.385.713.

Pada tanggal 24 Maret 2009, Bank meningkatkan modal disetornya sebanyak 64.000.000 saham melalui penambahan modal tanpa penerbitan Hak Memesan Efek Terlebih Dahulu. Peningkatan modal tersebut dilakukan oleh Dana Pensiun Perkebunan, pemegang saham pengendali Bank.

Pada tanggal 28 September 2009, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas III kepada Ketua Bapepam-LK dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sebanyak 1.040.632.622 Saham Biasa Atas Nama dengan nilai nominal Rp100 (Rupiah penuh) setiap lembar saham. Pada tanggal 9 November 2009, Ketua Bapepam-LK melalui Surat No. S-9827/BL/2009 menyetujui Pernyataan Penawaran Umum Terbatas III tersebut. Dari penawaran umum terbatas ini Bank telah meningkatkan jumlah modal sahamnya sebanyak 1.005.144.172 lembar saham.

Pada Penawaran Umum Terbatas III tersebut, Bank juga menerbitkan waran sejumlah 502.572.084 lembar yang dapat dikonversi menjadi saham Bank dengan nilai nominal Rp100 per lembar (Rupiah penuh). Sampai dengan tanggal 25 Mei 2011 (akhir dari konversi waran), jumlah waran yang telah dikonversi menjadi saham sejumlah 199.890.250 lembar, sehingga meningkatkan modal saham Bank sebesar Rp19.989.025.

1. GENERAL (continued)

c. Limited Public Offering of the Bank's Shares

From the Limited Public Offering I, the Bank increased its share capital by Rp30,586,734.

On March 14, 2005, the Bank submitted a Statement of Registration for a Limited Public Offering II to the Chairman of Bapepam-LK in accordance with the issuance of Pre-emptive Rights for 513,857,128 common shares with par value of Rp100 (full Rupiah) per share. On April 12, 2005, the Chairman of Bapepam-LK, through Letter No. S-757/PM/2005, approved the statement of registration. From the Limited Public Offering II, the Bank increased its share capital by Rp51,385,713.

On March 24, 2009, the Bank increased its share capital by 64,000,000 common shares through the issuance of additional share capital without Pre-emptive Rights. The additional share capital were issued by Dana Pensiun Perkebunan, as controlling shareholder of the Bank.

On September 28, 2009, the Bank submitted a Statement of Registration for a Limited Public Offering III to the Chairman of Bapepam-LK in accordance with the issuance of Pre-emptive Rights for 1,040,632,622 common shares with par value of Rp100 (full Rupiah) per share. On November 9, 2009, the Chairman of Bapepam-LK, through Letter No. S-9827/BL/2009, approved the Statement of Registration for a Limited Public Offering III. From the Limited Public Offering III, the Bank has increased its share capital by 1,005,144,172 shares.

In the Limited Public Offering III, the Bank also issued 502,572,084 warrants convertible into shares of the Bank with each nominal value of Rp100 (full Rupiah). Until May 25, 2011 (ending period of warrants conversion), the total warrants that have been converted into shares is 199,890,250 shares, thereby increasing the Bank's share capital by Rp19,989,025.

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1. UMUM (lanjutan)

c. Penawaran Umum Terbatas Saham Bank (lanjutan)

Pada tanggal 10 Mei 2013, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas IV kepada Dewan Komisiner Otoritas Jasa Keuangan dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sebanyak 3.846.035.599 Saham Biasa Atas Nama dengan nilai nominal Rp100 (Rupiah penuh) setiap lembar saham.

Pada tanggal 26 Juni 2013, Dewan Komisiner Otoritas Jasa Keuangan melalui Surat No. S-186/D.04/2013, menyetujui Pernyataan Penawaran Umum Terbatas IV tersebut. Dari penawaran umum terbatas ini Bank telah meningkatkan jumlah modal sahamnya sebanyak 3.832.685.599 lembar saham.

Pada tanggal 11 Mei 2015, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas V kepada Dewan Komisiner Otoritas Jasa Keuangan dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sebanyak 5.588.080.286 Saham Biasa Atas Nama dengan nilai nominal Rp100 (Rupiah penuh) setiap lembar saham. Pada tanggal 17 Juni 2015, Dewan Komisiner Otoritas Jasa Keuangan melalui Surat No. S-259/D.04/2015, menyatakan efektifnya Pernyataan Pendaftaran Penawaran Umum Terbatas V tersebut. Dari penawaran umum terbatas ini Bank telah meningkatkan jumlah modal sahamnya sebanyak 4.028.934.521 lembar saham.

Pada tanggal 17 Oktober 2016, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas VI kepada Dewan Komisiner Otoritas Jasa Keuangan dalam rangka Penambahan Modal Dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 3.845.996.122 saham biasa dengan nilai nominal Rp100 (Rupiah penuh) per saham dan menerbitkan Waran Seri II sebanyak 616.908.103 lembar.

Pada tanggal 25 November 2016, Dewan Komisiner Otoritas Jasa Keuangan melalui Surat No. S-695/D.04/2016 memberitahu mengenai Efektifnya Pernyataan Pendaftaran Penawaran Umum Terbatas VI, sehingga meningkatkan jumlah modal sahamnya sebanyak 3.845.996.122 lembar saham.

1. GENERAL (continued)

c. Limited Public Offering of the Bank's Shares (continued)

On May 10, 2013, the Bank submitted a Statement of Registration for a Limited Public Offering IV to the Board of Commissioners of Financial Service Authority in accordance with the issuance of Pre-emptive Rights for 3,846,035,599 common shares with par value of Rp100 (full Rupiah) per share.

On June 26, 2013, the Board of Commissioners of Financial Service Authority, through Letter No. S-186/D.04/2013, approved the Statement of Registration for a Limited Public Offering IV. From the Limited Public Offering IV, the Bank has increased its share capital by 3,832,685,599 shares.

On May 11, 2015, the Bank submitted a Statement of Registration for a Limited Public Offering V to the Board of Commissioners of Financial Service Authority, in accordance with the issuance of Pre-emptive Rights for 5,588,080,286 common shares with par value of Rp100 (full Rupiah) per share. On June 17, 2015, the Board of Commissioners of Financial Service Authority, through its Letter No. S-259/D.04/2015, declared the effectiveness of the Statement of Registration for a Limited Public Offering V. From the Limited Public Offering V, the Bank has increased its share capital by 4,028,934,521 shares.

On October 17, 2016, the Bank submitted a Statement of Registration for a Limited Public Offering VI to the Board of Commissioners of Financial Service Authority, in accordance with the issuance of Pre-emptive Rights for 3,845,996,122 common shares with par value of Rp100 (full Rupiah) per share and also issued Warrants Series II for 616,908,103.

On November 25, 2016, the Board of Commissioners of Financial Service Authority, through Letter No. S-695/D.04/2016, declared the effectiveness of Statement of Registration for a Limited Public Offering VI that increased Bank's share capital by 3,845,996,122 shares.

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1. UMUM (lanjutan)

c. Penawaran Umum Terbatas Saham Bank (lanjutan)

Waran Seri II dapat dikonversi menjadi saham Bank dengan nilai Rp130 per lembar (Rupiah penuh) dengan periode pelaksanaan dari 9 Juni 2017 sampai dengan 11 Juni 2018.

Sampai dengan tanggal 11 Juni 2018 (akhir dari konversi waran), jumlah waran yang telah dikonversi menjadi saham sejumlah 612.937.654 lembar, sehingga meningkatkan modal saham Bank sebesar Rp61.293.765.

Pada tanggal 2 Mei 2017, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas VII kepada Dewan Komisiner Otoritas Jasa Keuangan dalam rangka Penambahan Modal Dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 2.515.555.707 saham biasa dengan nilai nominal Rp100 (Rupiah penuh) per saham. Pada tanggal 12 Juni 2017, Dewan Komisiner Otoritas Jasa Keuangan melalui Surat No. S-293/D.04/2017, memberitahu mengenai efektifnya Pernyataan Pendaftaran Penawaran Umum Terbatas VII, sehingga meningkatkan jumlah modal sahamnya sebanyak 2.515.555.707 lembar saham.

Pada tanggal 16 Juli 2018, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas VIII kepada Dewan Komisiner Otoritas Jasa Keuangan dalam rangka Penambahan Modal Dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 5.001.089.604 saham biasa dengan nilai nominal Rp100 (Rupiah penuh) per saham. Pada tanggal 30 Agustus 2018, Dewan Komisiner OJK melalui Surat No. S-113/D.04/2018 memberitahu mengenai efektifnya Pernyataan Pendaftaran Penawaran Umum Terbatas VIII, sehingga meningkatkan jumlah modal sahamnya sebanyak 2.889.085.049 lembar saham.

Pada tanggal 30 September 2021, Bank menyampaikan Pernyataan Pendaftaran Penawaran Umum Terbatas IX kepada Dewan Komisiner Otoritas Jasa Keuangan dalam rangka Penambahan Modal Dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 1.054.545.185 saham biasa dengan nilai nominal Rp100 (Rupiah penuh) per saham.

1. GENERAL (continued)

c. Limited Public Offering of the Bank's Shares (continued)

Warrants Series II can be converted into shares with value per share of Rp130 (full Rupiah) from June 9, 2017 until June 11, 2018.

Until June 11, 2018 (ending period of warrants conversion), the total warrants that have been converted into shares is of 612,937,654 thereby increasing the Bank's share capital by Rp61,293,765.

On May 2, 2017, the Bank submitted a Statement of Registration for a Limited Public Offering VII to the Board of Commissioners of Financial Service Authority, in accordance with the issuance of Pre-emptive Rights for 2,515,555,707 common shares with par value of Rp100 (full Rupiah) per share. On June 12, 2017, the Board of Commissioners of Financial Service Authority, through Letter No. S-293/D.04/2017, declared the effectiveness of the Statement of Registration for a Limited Public Offering VII that increased Bank's share capital by 2,515,555,707 shares.

On July 16, 2018, the Bank submitted a Statement of Registration for a Limited Public Offering VIII to the Board of Commissioners of Financial Service Authority, in accordance with the issuance of Pre-emptive Rights for 5,001,089,604 common shares with par value of Rp100 (full Rupiah) per share. On August 30, 2018, the Board of Commissioners of Financial Service Authority, through Letter No. S-113/D.04/2018, declared effective the Statement of Registration for a Limited Public Offering VIII that increased Bank's share capital by 2,889,085,049 shares.

On September 30, 2021, the Bank submitted a Statement of Registration for a Limited Public Offering IX to the Board of Commissioners of Financial Service Authority, in accordance with the issuance of Pre-emptive Rights for 1,054,545,185 common shares with par value of Rp100 (full Rupiah) per share.

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1. UMUM (lanjutan)

c. Penawaran Umum Terbatas Saham Bank (lanjutan)

Pada tanggal 18 November 2021, Dewan Komisiner OJK melalui Surat No. S-207/D.04/2021 memberitahu mengenai efektifnya Pernyataan Pendaftaran Penawaran Umum Terbatas IX, sehingga meningkatkan jumlah modal sahamnya sebanyak 1.054.545.185 lembar saham (Catatan 27).

d. Akuisisi Bank

Pada tanggal 19 Agustus 2010, Dana Pensiun Perkebunan selaku pemegang 95,96% saham Bank dan PT Bank Rakyat Indonesia (Persero) Tbk (BRI) telah menandatangani Perjanjian Pengikatan Jual Beli (PPJB) Saham untuk mengakuisisi saham Bank dengan total nominal sebesar Rp330.296.054 untuk 3.030.239.023 lembar saham dengan harga Rp109 (Rupiah penuh) per lembar.

Komposisi kepemilikan saham Bank setelah akuisisi dan setelah dilakukan penjualan saham kembali kepada publik oleh BRI adalah 76% dimiliki oleh BRI, 14% Dana Pensiun Perkebunan (Dapenbun) dan 10% publik.

Akuisisi ini diselesaikan pada tanggal 3 Maret 2011, berdasarkan Akta Akuisisi No. 14 Notaris Fathiah Helmi, S.H., dimana BRI memiliki 88,65% dari seluruh saham yang ditempatkan dan disetor penuh dalam Bank, sebagaimana dimuat dalam Akta No. 68 tanggal 29 Desember 2009, Notaris Rusnaldy, S.H. Hal tersebut di atas telah mempertimbangkan efek dari Waran Seri I yang dapat dieksekusi sampai dengan tanggal 25 Mei 2011.

Untuk memenuhi Peraturan Bapepam-LK No. IX.H.1, Lampiran Keputusan Ketua Bapepam-LK No. Kep-259/BL/2008, tanggal 30 Juni 2008, tentang "Pengambilalihan Perusahaan Terbuka", BRI sebagai pengendali baru Bank diwajibkan untuk melaksanakan Penawaran Tender terhadap saham Bank yang dimiliki pemegang saham publik. Pernyataan Penawaran Tender telah dinyatakan efektif pada tanggal 4 Mei 2011 berdasarkan Surat Ketua Bapepam-LK No. S-4985/BL/2011 dan telah diumumkan pada 2 (dua) surat kabar harian nasional pada tanggal 5 Mei 2011.

1. GENERAL (continued)

c. Limited Public Offering of the Bank's Shares (continued)

On November 18, 2021, the Board of Commissioners of Financial Service Authority, through Letter No. S-207/D.04/2021, declared effective the Statement of Registration for a Limited Public Offering VIII that increased Bank's share capital by 1,054,545,185 shares (Note 27).

d. Acquisition of The Bank

On August 19, 2010, Dana Pensiun Perkebunan as owner of 95.96% of the Bank's shares and PT Bank Rakyat Indonesia (Persero) Tbk (BRI) entered into Sale and Purchase Agreement (PPJB) of Shares to acquire the shares of the Bank with total nominal value of Rp330,296,054 for 3,030,239,023 number of shares at a price of Rp109 (full Rupiah) per share.

After the acquisition and resale of shares to the public by BRI, the shareholders of the Bank comprises of 76% by BRI, 14% by Dana Pensiun Perkebunan (Dapenbun) and 10% by the public.

The acquisition was completed on March 3, 2011, based on the Acquisition Deed No. 14, Notary Fathiah Helmi, S.H., whereby BRI owned 88.65% of the total issued and fully paid shares of the Bank, as stated in Deed No. 68 dated December 29, 2009, Notary Rusnaldy, S.H. The above mentioned matter has considered the effects of Warrant Series I that could be exercised until May 25, 2011.

In compliance with Bapepam-LK Regulation No. IX.H.1, Attachment to Decision of Chairman of Bapepam-LK No. Kep-259/BL/2008 dated June 30, 2008 regarding "Public Company Takeovers", BRI, as the new controlling shareholder of the Bank is required to conduct mandatory Tender Offer for the remaining shares which are owned by the public. The Tender Offer statement became effective on May 4, 2011, based on the Letter of Bapepam-LK Chairman No. S-4985/BL/2011 and was published on 2 (two) national daily newspapers on May 5, 2011.

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1. UMUM (lanjutan)

d. Akuisisi Bank (lanjutan)

Masa Penawaran Tender dimulai pada tanggal 5 Mei 2011 dan berakhir pada tanggal 24 Mei 2011. Pada tanggal penutupan masa Penawaran Tender, terdapat 113.326.500 lembar saham (3,15% dari seluruh saham Bank) yang dibeli oleh BRI dari publik. Harga Penawaran Tender yang digunakan adalah sebesar Rp182 (Rupiah penuh) per lembar.

Pada tanggal 1 Juli 2011, BRI melakukan penjualan saham kepada Dapenbun sejumlah 256.375.502 lembar atas eksekusi opsi beli Dapenbun dengan harga Rp109 (Rupiah penuh) per lembar.

Sesuai dengan peraturan Bapepam-LK No. IX.H.1, jangka waktu pengembalian penawaran tender adalah selama 2 (dua) tahun, namun khusus untuk Bank, BRI wajib memenuhi minimal kepemilikan saham publik sebesar 10%, paling lambat pada tanggal 24 Mei 2013. Hal ini untuk memenuhi Surat Bursa Efek Indonesia No. S-06472/BEI.PPJ/09-2011 tanggal 23 September 2011 mengenai perpanjangan batas waktu peningkatan kepemilikan saham publik.

Sampai dengan tanggal 31 Desember 2011, saham Bank yang berhasil dijual ke publik sebesar 500.000 lembar saham, sehingga kepemilikan saham BRI di Bank pada tanggal 31 Desember 2011 menjadi 79,78% dan Dapenbun 14%.

Selama tahun 2012 dan sampai dengan tanggal 24 Mei 2013 tidak terdapat penjualan saham, sehingga kepemilikan saham publik untuk memenuhi Surat Bursa Efek Indonesia No. S-06472/BEI.PPJ/09-2011 tanggal 23 September 2011 sebesar 10% pada tanggal 24 Mei 2013, tidak dapat dipenuhi BRI karena tidak aktifnya harga saham Bank di pasar modal.

1. GENERAL (continued)

d. Acquisition of The Bank (continued)

The Tender Offer period started on May 5, 2011 and concluded on May 24, 2011. On the closing date of the Tender Offer period, BRI acquired 113,326,500 additional shares (3.15% of the total shares of the Bank) from the public. The Tender Offer price was at Rp182 (full Rupiah) per share.

On July 1, 2011, BRI conducted the sale of 256,375,502 shares to Dapenbun as a result of Dapenbun's exercise of its buy option at a price of Rp109 (full Rupiah) per share.

Based on Bapepam-LK Regulation No. IX.H.1, the period to return the Tender Offer is within a maximum period of 2 (two) years, however, in the case of the Bank, BRI required to meet the minimum public share ownership of 10%, no later than May 24, 2013. This was to comply with the Letter from the Indonesian Stock Exchange No. S-06472/BEI.PPJ/09-2011 dated September 23, 2011, regarding the extension of period for the increase of public shares ownership.

Up to December 31, 2011, the total shares of the Bank sold to the public amounted to 500,000 shares, so that BRI's ownership in the Bank as of December 31, 2011 is 79.78%, while Dapenbun's is 14%.

During the year 2012 and up to May 24, 2013, there were no sales of shares, thus the public share ownership to comply with the Letter from the Indonesian Stock Exchange No. S-06472/BEI.PPJ/09-2011 dated September 23, 2011 by 10% on May 24, 2013, could not met due to the Bank's inactive share price in the capital market.

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1. UMUM (lanjutan)

e. Struktur dan Manajemen

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2021 ditetapkan berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 6 April 2021 sesuai Akta Pernyataan Keputusan Rapat No. 18 tanggal 27 April 2021, Notaris M. Nova Faisal, S.H., M.Kn. di Jakarta, yang telah diterima dan dicatat di dalam Sistem Administrasi Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-AH.01.03-0249379 tanggal 21 April 2021, adalah sebagai berikut:

**31 Desember/
December 31, 2021**

Dewan Komisaris

Komisaris Utama
Komisaris Independen
Komisaris Independen
Komisaris Independen
Komisaris

Budi Satria
Eko B. Supriyanto
Rina Saadah
Rama G. Notowidigdo
Achmad F.C. Barir

Direksi

Direktur Utama
Direktur Keuangan dan Operasional
Direktur *Enterprise Risk Management*
Compliance & Human Resource
Direktur Retail Agri dan Pendanaan
Direktur Digital Bisnis

Kaspar Situmorang
Arif Wicaksono
Ernawan
Sigit Murtiyoso
Bhimo Wikan Hantoro

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2020 ditetapkan berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 19 Februari 2020 sesuai Akta Pernyataan Keputusan Rapat No. 1 tanggal 4 Mei 2020, Notaris M. Nova Faisal, S.H., M.Kn. di Jakarta, yang telah diterima dan dicatat di dalam Sistem Administrasi Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-AH.01.03-0208129 tanggal 4 Mei 2020, adalah sebagai berikut:

**31 Desember/
December 31, 2020**

Dewan Komisaris

Komisaris Utama
Komisaris Independen
Komisaris Independen
Komisaris

Budi Satria
A.Y. Soepadmo
Anna Maria Tjiadarma
I.B.K. Suamba Manuaba

Board of Commissioners

President Commissioner
Independent Commissioner
Independent Commissioner
Independent Commissioner
Commissioner

Board of Directors

President Director
Finance & Operational Director
Enterprise Risk Management Director
Compliance & Human Resources
Retail Agri and Funding Director
Digital Business Director

The composition of the Board of Commissioners and Directors of the Bank as of December 31, 2020 based on the Bank's Annual General Shareholders Meeting held on February 19, 2020 stated under Deed of Meeting Resolution Statements No. 1 dated May 4, 2020, Notary M. Nova Faisal, S.H., M.Kn. in Jakarta, that has been received and recorded in the Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-AH.01.03-0208129 dated May 4, 2020, are as follows:

Board of Commissioners

President Commissioner
Independent Commissioner
Independent Commissioner
Commissioner

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1. UMUM (lanjutan)

e. Struktur dan Manajemen (lanjutan)

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2020 ditetapkan berdasarkan Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 19 Februari 2020 sesuai Akta Pernyataan Keputusan Rapat No. 1 tanggal 4 Mei 2020, Notaris M. Nova Faisal, S.H., M.Kn. di Jakarta, yang telah diterima dan dicatat di dalam Sistem Administrasi Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-AH.01.03-0208129 tanggal 4 Mei 2020, adalah sebagai berikut (lanjutan):

**31 Desember/
December 31, 2020**

Direksi

Direktur Utama
Direktur *Risk Management*
Direktur Bisnis
Direktur Legal, *Compliance* dan
Human Capital
Direktur Operasional dan Keuangan

Ebeneser Girsang
Herry Prayudi
Sigit Murtiyoso
Ernawan
Arif Wicaksono

Susunan Komite Audit Bank pada tanggal 31 Desember 2021 yang ditetapkan berdasarkan Surat Keputusan Direksi No. Kpts.R.171/Dir.03.04/PHC/05/2021 tanggal 6 Mei 2021 dan Surat Dewan Komisaris No. R.62/DK-IV/2021 tanggal 28 April 2021, adalah sebagai berikut:

Ketua	Rina Saadah
Anggota	Eko B. Supriyanto
Anggota	Ari Setyo Wibowo
Anggota	Antonius Suryanta

Susunan Komite Audit Bank pada tanggal 31 Desember 2020 yang ditetapkan berdasarkan Surat Keputusan Direksi No. Kpts.R.30/Dir.01.02/MSDM/08/2019 tanggal 13 Agustus 2019 dan Surat Dewan Komisaris No. R.50/DK-VIII/2019 tanggal 13 Agustus 2019, adalah sebagai berikut:

Ketua	A.Y. Soepadmo
Anggota	Retno Surdini
Anggota	Antonius Suryanta

1. GENERAL (continued)

e. Structure and Management (continued)

The composition of the Board of Commissioners and Directors of the Bank as of December 31, 2020 based on the Bank's Annual General Shareholders Meeting held on February 19, 2020 stated under Deed of Meeting Resolution Statements No. 1 dated May 4, 2020, Notary M. Nova Faisal, S.H., M.Kn in Jakarta, that has been received and recorded in the Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-AH.01.03-0208129 dated May 4, 2020, are as follows (continued):

Board of Directors

President Director
Risk Management Director
Business Director
Legal, Compliance and
Human Capital Director
Operation and Finance Director

The composition of the Audit Committee of the Bank as of December 31, 2021 based on Decision Letter of Board of Directors No. Kpts.R.171/Dir.03.04/PHC/05/2021 dated May 6, 2021 and Decision Letter of Board of Commissioners No. R.63/DK-IV/2021 dated April 28, 2021, are as follows:

Chairman
Member
Member
Member

The composition of the Audit Committee of the Bank as of December 31, 2020 based on Decision Letter of Board of Directors No. Kpts.R.30/Dir.01.02/MSDM/08/2019 dated August 13, 2019 and Decision Letter of Board of Commissioners No. R.50/DK-VIII/2019 dated August 13, 2019, are as follows:

Chairman
Member
Member

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1. UMUM (lanjutan)

e. Struktur dan Manajemen (lanjutan)

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Sekretaris Perusahaan Bank adalah Hirawan Nur Kustono sesuai dengan Surat Keputusan Direksi Bank No. Kpts.30/Dir.01.03/III/2004 tanggal 1 Maret 2004.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Kepala Satuan Kerja Audit Internal Bank adalah Anshari Assadiqi berdasarkan Surat Keputusan Direksi Bank No. Kpts.R.41/Dir.01.02/HCP/PHC/10/2020 tanggal 23 Oktober 2020.

Berdasarkan kebijakan Bank, manajemen kunci Bank mencakup anggota dewan komisaris, direksi, komite audit, komite remunerasi, kepala divisi, kepala bagian langsung di bawah direksi dan kepala cabang.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank memiliki karyawan tetap dan karyawan tidak tetap sebagai berikut (tidak diaudit):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Tetap	632	575
Tidak tetap	249	279
Total	881	854

1. GENERAL (continued)

e. Structure and Management (continued)

As of December 31, 2021 and 2020, the Corporate Secretary of the Bank is Hirawan Nur Kustono based on the Board of Directors Decision Letter No. Kpts.30/ Dir.01.03/III/2004, dated March 1, 2004.

As of December 31, 2021 and 2020, the Bank's Head of Internal Audit Task Force is Anshari Assadiqi based on the Bank's Board of Directors Decision Letter No. Kpts.R.41/Dir.01.02/HCP/PHC/10/2020 dated October 23, 2020.

Based on the Bank's policies, key management of the Bank consist of members of the board commissioners, board of directors, audit committee, remuneration committee, division heads, department heads directly reporting to the directors and branch heads.

As of December 31, 2021 and 2020, the Bank has permanent and non-permanent employees as follows (unaudited):

Permanent
Non-permanent
Total

2. IKHTISAR KEBIJAKAN AKUNTANSI

Pernyataan Kepatuhan

Laporan keuangan pada tanggal 31 Desember 2021 dan untuk tahun yang berakhir pada tanggal tersebut disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia, yang mencakup pernyataan dan interpretasi yang dikeluarkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia (DSAK-IAI) dan peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam-LK) No. VIII.G.7 lampiran keputusan Ketua Bapepam-LK No. KEP-347/BL/2012 tanggal 25 Juni 2012 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

2. SUMMARY OF ACCOUNTING POLICIES

Statement of Compliance

The financial statements as of December 31, 2021 and for the year then ended, is prepared and presented in accordance with Indonesian Financial Accounting Standards, which include the statements and interpretations issued by the Financial Accounting Standards Board Indonesian Institute of Accountants (DSAK-IAI) and Indonesian Capital Market and Financial Institutions Supervisory Agency (Bapepam-LK) Regulation No.VIII.G.7 appendix of the Decision of the Chairman of Bapepam-LK No.KEP-347/BL/2012 dated June 25, 2012 regarding the "Guidelines on Financial Statements Presentations and Disclosures for Issuers or Public Companies".

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2. IKHTISAR KEBIJAKAN AKUNTANSI

a. Dasar Pengukuran dan Penyusunan Laporan Keuangan

Laporan keuangan disusun sesuai dengan Pernyataan Standar Akuntansi Keuangan (PSAK) 1 (Amandemen 2015): "Penyajian Laporan Keuangan tentang Prakarsa Pengungkapan".

Laporan keuangan disusun berdasarkan nilai historis kecuali untuk beberapa akun yang dinilai menggunakan dasar pengukuran lain sebagaimana dijelaskan pada kebijakan akuntansi dari akun tersebut. Laporan keuangan disusun dengan dasar akrual.

Laporan arus kas disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi dan pendanaan.

Untuk keperluan laporan arus kas, yang termasuk kas dan setara kas terdiri dari kas, giro pada Bank Indonesia dan 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.

Mata uang penyajian yang digunakan dalam laporan keuangan adalah mata uang Rupiah (Rp). Angka-angka yang disajikan dalam laporan keuangan, kecuali bila dinyatakan secara khusus, adalah dibulatkan dalam ribuan Rupiah.

b. Aset keuangan dan liabilitas keuangan

Aset keuangan terdiri dari kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, efek-efek, efek-efek yang dibeli dengan janji dijual kembali, tagihan lainnya, tagihan akseptasi, kredit yang diberikan, penyertaan saham dan aset lain-lain (piutang bunga dan piutang lain-lain).

2. SUMMARY OF ACCOUNTING POLICIES

a. Basis of Measurement and Preparation of the Financial Statements

The financial statements is presented in conformity with the Statement of Financial Accounting Standards ("SFAS") 1 (2015 Amendments): "Presentation of Financial Statements on Disclosures Initiative".

The financial statements have been prepared on a historical cost basis except for some accounts which were assessed using another measurement basis as explained in the accounting policy for such accounts. The financial statements have been prepared on accrual basis

The statement of cash flows were prepared using the direct method by classifying the cash flows into operating, investing and financing activities.

For the statement of cash flows purposes, cash and cash equivalents consists of cash, current accounts with Bank Indonesia and current accounts with other banks and placements with Bank Indonesia and other banks maturing within 3 (three) months or less from the acquisition date provided that they are neither pledged as collateral for fund borrowings nor restricted.

The presentation currency used in the financial statements is the Indonesian Rupiah (Rp). Unless otherwise stated, all figures presented in the financial statements are rounded off to thousands of Rupiah.

b. Financial assets and financial liabilities

Financial assets consist of cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, securities, securities purchased under agreement to resell, other receivables, acceptance receivables, loans, investment in shares of stocks and other assets (interest receivables and other receivables).

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

b. Aset keuangan dan liabilitas keuangan (lanjutan)

Liabilitas keuangan terdiri dari liabilitas segera, simpanan nasabah, simpanan dari bank lain, liabilitas akseptasi, surat berharga yang diterbitkan, pinjaman yang diterima dan liabilitas lain-lain (bunga yang masih harus dibayar, setoran jaminan dan liabilitas sewa).

(i) Klasifikasi

Untuk menentukan kategori dan klasifikasi, Bank menilai seluruh aset keuangan, kecuali instrumen ekuitas dan derivatif, berdasarkan kombinasi dari model bisnis pengelolaan aset dan karakteristik arus kas kontraktual instrumen terkait. Berikut klasifikasi aset keuangan pada saat pengakuan awal:

- Aset keuangan yang diukur pada biaya perolehan diamortisasi;
- Aset keuangan, dalam hal ini instrumen utang, yang diukur pada nilai wajar melalui penghasilan komprehensif lain, dengan keuntungan/kerugian diakui pada laba rugi pada saat pelepasan;
- Aset keuangan, dalam hal ini Instrumen ekuitas, yang diukur pada nilai wajar melalui penghasilan komprehensif lain dengan keuntungan/kerugian tidak diakui pada laba rugi pada saat pelepasan; atau
- Aset keuangan yang diukur pada nilai wajar melalui laba rugi.

Bank mengklasifikasi dan mengukur instrumen derivatif dan portofolio *trading* pada aset keuangan yang diakui pada nilai wajar melalui laba rugi.

Aset keuangan diukur pada biaya perolehan diamortisasi jika memenuhi kondisi sebagai berikut:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan dalam rangka mendapatkan arus kas kontraktual; dan

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

Financial liabilities consist of liabilities due immediately, deposits from customers, deposits from other banks, acceptance liabilities, marketable securities issued, fund borrowings and other liabilities (interest payable, guarantee deposits and lease liabilities).

(i) Classification

To determine category and classification, the Bank assesses all financial assets, except equity and derivative instruments, based on a combination of the asset management business model and the contractual cash flow characteristics of the related instruments. The following is the classification of financial assets at initial recognition:

- Financial assets measured at amortized cost;
- Financial assets, in this case debt instruments, measured at fair value through other comprehensive income, with gains/losses recognized in profit or loss on disposal;
- Financial assets, in this case equity instruments, measured at fair value through other comprehensive income with gains/losses not recognized in profit or loss on disposal; or
- Financial assets measured at fair value through profit or loss.

The Bank classifies and measures derivative instruments and trading portfolios on financial assets recognized at fair value through profit or loss.

Financial assets are measured at amortized cost if the following conditions are met:

- Financial assets are managed in a business model that aims to hold financial assets in order to obtain contractual cash flows; and

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Aset keuangan diukur pada biaya perolehan diamortisasi jika memenuhi kondisi sebagai berikut (lanjutan):

- Persyaratan kontraktual dari aset keuangan tersebut memberikan hak pada tanggal tertentu atas arus kas yang diperoleh semata dari pembayaran pokok dan bunga dari jumlah pokok terutang.

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain jika memenuhi kondisi sebagai berikut:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk mendapatkan arus kas kontraktual dan menjual aset keuangan; dan
- Persyaratan kontraktual dari aset keuangan tersebut memberikan hak pada tanggal tertentu atas arus kas yang diperoleh semata dari pembayaran pokok dan bunga dari jumlah pokok terutang.

Aset keuangan lainnya yang tidak memenuhi persyaratan untuk diklasifikasikan sebagai 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 pada nilai wajar melalui laba rugi, apabila penetapan tersebut mengeliminasi atau secara signifikan mengurangi inkonsistensi pengukuran atau pengakuan (kadang disebut sebagai "accounting mismatch").

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(i) Classification (continued)

Financial assets are measured at amortized cost if the following conditions are met (continued):

- The contractual terms of the financial asset entitle at a specified date, cash flows derived solely from payment of the principal and interest on the outstanding principal amount.

Financial assets are measured at fair value through other comprehensive income if the following conditions are met:

- Financial assets are managed in a business model that aims to collect contractual cash flows and sell financial assets; and
- The contractual terms of the financial asset entitle at a specified date, cash flows derived solely from payment the principal and interest on the outstanding principal amount.

Other financial assets that do not meet the requirements for classification as measured at amortized cost or fair value through other comprehensive income, are classified as measured at fair value through profit or loss.

At initial recognition, the Bank may make an irrevocable determination to measure assets that meet the requirements to be measured at amortized cost or fair value through other comprehensive income at fair value through profit or loss, if that designation eliminates or significantly reduces measurement or recognition inconsistencies (sometimes referred to as "accounting mismatch").

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Pada saat pengakuan awal, Bank dapat membuat pilihan yang tidak dapat dibatalkan untuk menyajikan instrumen ekuitas yang bukan dimiliki untuk di perdagangan pada nilai wajar melalui penghasilan komprehensif lain.

Penilaian model bisnis

Model bisnis ditentukan pada level yang mencerminkan bagaimana kelompok aset keuangan dikelola bersama-sama untuk mencapai tujuan bisnis tertentu.

Penilaian model bisnis dilakukan dengan mempertimbangkan, tetapi tidak terbatas pada, hal-hal berikut:

- Bagaimana kinerja dari model bisnis dan aset keuangan yang dimiliki dalam model bisnis dievaluasi dan dilaporkan kepada personil manajemen kunci Bank;
- Apakah risiko yang memengaruhi kinerja dari model bisnis (termasuk aset keuangan yang dimiliki dalam model bisnis) dan khususnya bagaimana cara aset keuangan tersebut dikelola; dan
- Bagaimana penilaian kinerja pengelola aset keuangan (sebagai contoh, apakah penilaian kinerja berdasarkan nilai wajar dari aset yang dikelola atau arus kas kontraktual yang diperoleh).

Aset keuangan yang dimiliki untuk diperdagangkan dan penilaian kinerja berdasarkan nilai wajar diukur pada nilai wajar melalui laba rugi.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(i) 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.

Business model assessment

The business model is defined at a level that reflects how groups of financial assets are managed together to achieve specific business objectives.

The business model assessment is carried out by considering, but not limited to, the following:

- *How is the performance of the business model and financial assets held in the business model evaluated and reported to key management personnel of the Bank;*
- *What are the risks that affect the performance of the business model (including financial assets held in the business model) and specifically how those financial assets are managed; and*
- *How is the performance of the financial asset manager assessed (for example, is the performance assessment based on the fair value of the managed assets or the contractual cash flows obtained).*

Financial assets held for trading and performance assessment based on fair value are measured at fair value through profit or loss.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga.

Untuk tujuan penilaian ini, pokok didefinisikan sebagai nilai wajar dari aset keuangan pada saat pengakuan awal. Bunga didefinisikan sebagai imbalan untuk nilai waktu atas uang dan risiko kredit terkait jumlah pokok terutang pada periode waktu tertentu dan juga risiko dan biaya peminjaman standar, dan juga margin laba.

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga dilakukan dengan mempertimbangkan persyaratan kontraktual, termasuk apakah aset keuangan mengandung persyaratan kontraktual yang dapat merubah waktu atau jumlah arus kas kontraktual.

Dalam melakukan penilaian, Bank mempertimbangkan:

- Peristiwa kontijensi yang akan mengubah waktu atau jumlah arus kas kontraktual;
- Fitur *leverage*;
- Persyaratan pembayaran dimuka dan perpanjangan kontraktual;
- Persyaratan mengenai klaim yang terbatas atas arus kas yang berasal dari aset spesifik; dan
- Fitur yang dapat merubah nilai waktu dari elemen uang.

Bank mengklasifikasikan liabilitas keuangan dalam kategori:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi;
- Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(i) Classification (continued)

Assessment of the contractual cash flows derived solely from payments of principal and interest.

For the purposes of this valuation, principal is defined as the fair value of the financial asset at initial recognition. Interest is defined as the consideration for the time value of money and credit risk related to the principal amount owed in a specific period of time as well as standard borrowing risks and costs, as well as profit margin.

The assessment of contractual cash flows derived solely from payments of principal and interest is made by considering the contractual terms, including whether the financial asset contains contractual terms that can change the timing or amount of the contractual cash flows.

In conducting the assessment, the Bank considers:

- Contingent events that will change the timing or amount of contractual cash flows;
- Leverage feature;
- Requirements for prepayments and contractual extensions;
- Requirements regarding claims that are limited to cash flows arising from specific assets; and
- Features that can change the time value of the money element.

The Bank classifies financial liabilities into the following categories:

- Financial liabilities measured at fair value through profit or loss;
- Financial liabilities measured at amortized cost.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi terdiri dari dua sub-kategori, yaitu liabilitas keuangan diklasifikasikan sebagai diperdagangkan dan liabilitas keuangan yang pada saat pengakuan awal telah ditetapkan oleh Bank untuk diukur pada nilai wajar melalui laba rugi.

Liabilitas keuangan diklasifikasikan sebagai diperdagangkan jika diperoleh terutama untuk tujuan dijual atau dibeli kembali dalam waktu dekat atau jika merupakan bagian dari portofolio instrumen keuangan tertentu yang dikelola bersama dan terdapat bukti mengenai pola ambil untung dalam jangka pendek yang terkini.

Derivatif diklasifikasikan sebagai liabilitas diperdagangkan kecuali ditetapkan dan efektif sebagai instrumen lindung nilai.

Bank mengklasifikasikan seluruh liabilitas keuangan setelah pengakuan awal diukur pada biaya perolehan diamortisasi, kecuali:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi;
- Liabilitas keuangan yang timbul ketika pengalihan aset keuangan tidak memenuhi syarat penghentian pengakuan atau ketika pendekatan keterlibatan berkelanjutan diterapkan;
- Kontrak jaminan keuangan;
- Komitmen untuk menyediakan pinjaman dengan suku bunga di bawah pasar; atau
- Imbalan kontinjensi yang diakui oleh pihak pengakuisisi dalam kombinasi bisnis.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(i) Classification (continued)

Financial liabilities measured at fair value through profit or loss consist of two sub-categories, namely financial liabilities classified as trading and financial liabilities which upon initial recognition have been determined by the Bank to be measured at fair value through profit or loss.

A financial liability is classified as trading if it is acquired primarily for the purpose of selling or repurchasing in the near term or if it is part of a jointly managed portfolio of certain financial instruments and there is evidence of a recent short-term profit taking pattern.

Derivatives are classified as liabilities for trading unless they are designated and effective as hedging instruments.

The Bank classifies all financial liabilities after initial recognition measured at amortized cost, except:

- *Financial liabilities measured at fair value through profit or loss;*
- *Financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition or when the continuing involvement approach is applied;*
- *Financial guarantee contracts;*
- *Commitment to providing loans at below market interest rates; or*
- *Contingent benefits recognized by the acquirer in the business combination.*

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**b. Aset keuangan dan liabilitas keuangan
(lanjutan)**

(ii) Pengakuan awal

- Pembelian atau penjualan aset keuangan yang memerlukan penyerahan aset dalam kurun waktu yang telah ditetapkan oleh peraturan dan kebiasaan yang berlaku di pasar (pembelian secara reguler) diakui pada tanggal penyelesaian.
- Aset keuangan dan liabilitas keuangan pada awalnya diukur pada nilai wajarnya. Dalam hal aset keuangan atau liabilitas keuangan tidak diukur pada nilai wajar melalui laba rugi, nilai wajar tersebut ditambah biaya transaksi yang dapat diatribusikan secara langsung. Pengukuran aset keuangan dan liabilitas keuangan setelah pengakuan awal tergantung pada klasifikasinya.

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.

Untuk aset keuangan, biaya transaksi ditambahkan pada jumlah yang diakui pada awal pengakuan aset, sedangkan untuk liabilitas keuangan, biaya transaksi dikurangkan dari jumlah utang yang diakui pada pengakuan awal liabilitas.

Biaya transaksi tersebut diamortisasi selama umur instrumen berdasarkan metode suku bunga efektif dan dicatat sebagai bagian dari pendapatan bunga untuk biaya transaksi sehubungan dengan aset keuangan atau sebagai bagian dari beban bunga untuk biaya transaksi sehubungan dengan liabilitas keuangan.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

**b. Financial assets and financial liabilities
(continued)**

(ii) Initial recognition

- Purchase or sale of financial assets that requires delivery of assets within a time frame established by regulation or convention in the market (regular purchase) is recognized on the settlement date.
- Financial assets and financial liabilities are initially recognized at fair value. For those financial assets or financial liabilities not measured at fair value through profit or loss, the fair value includes directly attributable transaction costs. The subsequent measurement of financial assets and financial liabilities depends on their classification.

Transaction costs only include 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 instrument had not been acquired or issued.

In the case of financial assets, transaction costs are added to the amount initially recognized, while for financial liabilities, transaction costs are deducted from the amount of debt initially recognized.

Such transactions costs are amortized over the terms of the instruments based on effective interest rate method and are recorded as part of interest income for transaction costs related to financial assets or as part of interest expense for transaction costs related to financial liabilities.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(ii) Pengakuan awal (lanjutan)

Bank pada pengakuan awal dapat menetapkan aset keuangan tertentu sebagai nilai wajar melalui laba rugi (opsi nilai wajar). Opsi nilai wajar dapat digunakan hanya bila memenuhi ketentuan sebagai berikut:

- Penetapan sebagai opsi nilai wajar mengurangi atau mengeliminasi ketidak-konsistenan pengukuran dan pengakuan (accounting mismatch) yang dapat timbul; atau
- Aset keuangan merupakan bagian dari portofolio instrumen keuangan yang risikonya dikelola dan dilaporkan kepada manajemen kunci berdasarkan nilai wajar; atau
- Aset keuangan terdiri dari kontrak utama dan derivatif melekat yang harus dipisahkan.

Opsi nilai wajar digunakan untuk kredit yang diberikan dan piutang tertentu yang dilindung nilai menggunakan *credit derivatives* atau *swap* suku bunga, namun tidak memenuhi kriteria untuk akuntansi lindung nilai. Jika tidak, kredit yang diberikan akan dicatat menggunakan biaya diamortisasi dan derivatif akan diukur menggunakan nilai wajar melalui laba rugi. Saat ini Bank tidak menerapkan akuntansi lindung nilai.

Opsi nilai wajar juga digunakan untuk dana investasi yang merupakan bagian dari portofolio yang dikelola dengan basis nilai wajar. Opsi nilai wajar juga digunakan untuk *structured investment* termasuk derivatif melekat.

(iii) Pengukuran setelah pengakuan awal

Aset keuangan dalam kelompok yang diukur pada nilai wajar melalui penghasilan komprehensif lain diukur pada nilai wajarnya dan perubahan atas nilai wajar tersebut dicatat pada penghasilan komprehensif lain.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(ii) Initial recognition (continued)

The bank may, at initial recognition, designate certain financial assets as fair value through profit or loss (fair value option). The fair value option can be used only if it meets the following provisions:

- *Designation as fair value option reduces or eliminates measurement and recognition inconsistencies (accounting mismatches) that could arise; or*
- *Financial assets are part of a financial instruments portfolio which risks are managed and reported to key management at fair value; or*
- *Financial assets consist of host contracts and embedded derivatives that must be separated.*

The fair value option is used for certain loans and receivables that are hedged using credit derivatives or interest rate swaps, but do not meet the criteria for hedge accounting. Otherwise, loans are recorded at amortized cost and derivatives are measured at fair value through profit or loss. Currently, the Bank does not apply hedge accounting.

The fair value option is also used for investment funds that are part of a portfolio managed on a fair value basis. The fair value option is also used for structured investments including embedded derivatives.

(iii) Subsequent measurement

Financial assets held at fair value through other comprehensive income are measured at fair value and changes in fair value are recorded in other comprehensive income.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(iii) Pengukuran setelah pengakuan awal (lanjutan)

Aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi diukur pada nilai wajarnya dan perubahan diakui pada laba rugi.

Aset keuangan dan liabilitas keuangan yang diukur pada biaya perolehan diamortisasi diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

(iv) Penghentian pengakuan

a. Aset keuangan dihentikan pengakuannya jika:

- Hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir; atau
- Bank mentransfer haknya untuk menerima arus kas yang berasal dari aset keuangan atau menanggung liabilitas untuk membayarkan arus kas yang diterima tersebut secara penuh tanpa penundaan berarti kepada pihak ketiga di bawah kesepakatan pelepasan (*pass-through arrangement*), 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.

Ketika Bank telah mentransfer hak untuk menerima arus kas dari aset atau telah memasuki *pass-through arrangement* dan tidak mentransfer serta tidak mempertahankan secara substansial seluruh risiko dan manfaat atas aset atau tidak mentransfer kendali atas aset, aset tersebut diakui sebesar keterlibatan Bank yang berkelanjutan atas aset tersebut.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(iii) Subsequent measurement (continued)

Financial assets and financial liabilities at fair value through profit or loss are measured at fair value and changes are recognized in profit or loss.

Financial assets and financial liabilities at amortized cost are measured at amortized cost using the effective interest method.

(iv) Derecognition

a. Financial assets are derecognized when:

- *The contractual rights to receive cash flows from the financial assets have expired; or*
- *The Bank has transferred its rights to receive cash flows from the financial assets 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 substantially transferred all the risks and rewards of the assets, or (b) the Bank has neither transferred nor retained substantially all risks and rewards of the assets, but has transferred control of the assets.*

When the Bank has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognized to the extent of the Bank's continuing involvement in the asset.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(iv) Penghentian pengakuan (lanjutan)

a. Aset keuangan dihentikan pengakuannya jika (lanjutan):

Bank melepaskan aset keuangan, seperti kredit yang diberikan, ketika syarat dan kondisi telah direnegosiasi hingga secara substansial, kredit yang diberikan tersebut menjadi baru, dengan perbedaan akan dicatat sebagai keuntungan atau kerugian dari pelepasan, jika kerugian penurunan nilai belum dicatat.

Kredit yang diberikan tersebut akan diklasifikasikan sebagai *Stage 1* untuk penilaian *Expected Credit Losses* (ECL), kecuali kredit yang diberikan tersebut dianggap aset keuangan yang dibeli atau yang berasal dari aset keuangan memburuk (*Purchased or Originated Credit-Impaired Financial Assets - POCI*).

Jika modifikasi tidak akan menghasilkan arus kas yang secara substansi berbeda, maka modifikasi tidak akan berujung pada pelepasan aset. Berdasarkan perbedaan arus kas yang didiskonto pada *Effective Interest Rate* (EIR) awal, Bank akan mencatat keuntungan atau kerugian akibat modifikasi, sampai dengan jumlah kerugian penurunan nilai yang belum diakui.

Penghapusbukuan kredit yang diberikan dilakukan ketika tidak terdapat lagi prospek yang realistis mengenai pengembalian pinjaman atau hubungan normal antara Bank dan debitur telah berakhir. Kredit yang tidak dapat dilunasi tersebut dihapusbukuan dengan mendebet cadangan kerugian penurunan nilai.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(iv) Derecognition (continued)

a. Financial assets are derecognized when (continued):

The Bank disposes financial assets, such as loans, when the terms and conditions have been substantially renegotiated, the loans becomes new, with the difference will be recorded as gain or loss on disposal, if the impairment loss has not been recorded.

The loans will be classified as *Stage 1* for the assessment of *Expected Credit Losses* (ECL), unless the loans is considered a purchased financial asset or originating from a deteriorating financial asset (*Purchased or Originated Credit-Impaired Financial Assets - POCI*).

If the modification will not result in a substantially different cash flow, the modification will not result in the disposal of the asset. Based on the difference in cash flows discounted at the initial *Effective Interest Rate* (EIR), the Bank will record the gain or loss resulting from the modification, up to the amount of the unrecognized impairment loss.

Loans are written-off when there are no realistic prospects for loan repayments or the normal relationship between the Bank and debtors has ended. The uncollectible loan is written-off against the related allowance for impairment losses.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(iv) Penghentian pengakuan (lanjutan)

a. Aset keuangan dihentikan pengakuannya jika (lanjutan):

Akumulasi keuntungan/kerugian yang diakui pada penghasilan komprehensif lain terkait pilihan Bank untuk menyajikan instrumen ekuitas yang bukan dimiliki untuk diperdagangkan pada nilai wajar melalui penghasilan komprehensif lain, tidak diakui dalam laba rugi pada saat penghentian pengakuan.

b. Liabilitas keuangan dihentikan pengakuannya jika liabilitas keuangan tersebut berakhir, yaitu ketika liabilitas yang ditetapkan dalam kontrak dilepaskan atau 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.

(v) Pengakuan pendapatan dan beban

a. Pendapatan dan beban bunga, untuk aset yang diukur pada nilai wajar melalui penghasilan komprehensif lain serta aset keuangan dan liabilitas keuangan yang dicatat berdasarkan biaya perolehan diamortisasi, diakui pada laporan laba rugi dan penghasilan komprehensif lain dengan menggunakan suku bunga efektif.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(iv) Derecognition (continued)

a. Financial assets are derecognized when (continued):

The accumulated gain/loss recognized in other comprehensive income related to the choice of the Bank to present equity instruments that are not held for trading at fair value through other comprehensive income, are not recognized in profit or loss upon derecognition.

b. Financial liabilities are derecognized when they end, i.e. when the obligation under the liability is discharged, cancelled or expired.

Where an existing financial liability is replaced by another from the same creditor 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 recognized in the statement of profit or loss and other comprehensive income.

(v) Income and expense recognition

a. Interest income and expenses, for assets measured at fair value through other comprehensive income and financial assets and financial liabilities carried at amortized cost, are recognized in the statement of profit or loss and other comprehensive income using the effective interest rate.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(v) Pengakuan pendapatan dan beban (lanjutan)

b. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi, diakui pada laporan laba rugi dan penghasilan komprehensif lain.

c. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar dan lainnya atas aset keuangan yang diklasifikasikan dalam kelompok nilai wajar melalui penghasilan komprehensif lain diakui secara langsung dalam ekuitas, kecuali keuntungan atau kerugian akibat perubahan nilai tukar dari item moneter, dihentikan pengakuannya atau adanya penurunan nilai dari aset keuangan tersebut.

Jumlah tercatat bruto aset keuangan adalah biaya perolehan diamortisasi aset keuangan sebelum disesuaikan dengan cadangan kerugian penurunan nilai.

Dalam menghitung pendapatan dan beban bunga, tingkat bunga efektif diterapkan pada jumlah tercatat bruto aset (ketika aset tersebut bukan aset keuangan memburuk) atau terhadap biaya perolehan diamortisasi dari liabilitas.

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.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(v) Income and expense recognition (continued)

b. Gains and losses arising from changes in fair value of financial assets and financial liabilities at fair value through profit or loss are recognized in the statement of profit or loss and other comprehensive income.

c. Gains and losses arising from changes in fair value and other of financial assets classified as fair value through other comprehensive income are recognized directly in equity, except for gains or losses resulting from changes in the exchange rate of monetary items, derecognition or impairment of these financial assets.

The gross carrying amount of financial assets is the amortized cost of financial assets before adjusted with allowance for impairment losses.

In calculating interest income and expense, the effective interest rate is applied either to the gross carrying amount of the asset (when the asset is not a deteriorating financial asset) or to the amortized cost of the liability.

For financial assets that deteriorate after initial recognition, interest income is calculated by applying the effective interest rate to the amortized cost of the financial asset. If the asset is no longer deteriorating, then the interest income calculation will be calculated by applying the effective interest rate to the gross carrying amount of the financial asset.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(v) Pengakuan pendapatan dan beban (lanjutan)

Untuk aset keuangan yang telah memburuk pada saat 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 tetap dihitung dengan menerapkan tingkat bunga efektif terhadap biaya perolehan diamortisasi dari aset keuangan tersebut.

(vi) Reklasifikasi aset keuangan

Bank mereklasifikasi aset keuangan jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah. Tidak terdapat reklasifikasi untuk liabilitas keuangan.

(vii) Saling hapus

Aset keuangan dan liabilitas keuangan dilakukan saling hapus dan nilai netonya 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 adanya maksud untuk menyelesaikan secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara simultan.

Hal yang berkekuatan hukum harus tidak kontingen atas peristiwa di masa depan dan harus dapat dipaksakan di dalam situasi bisnis yang normal, peristiwa kegagalan atau kebangkrutan dari entitas atas seluruh pihak lawan.

Pendapatan dan beban disajikan dalam jumlah neto hanya jika diperkenankan oleh Standar Akuntansi Keuangan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(v) Income and expense recognition (continued)

For financial assets that have deteriorated on initial recognition, interest income is calculated by applying the effective interest rate to the amortized cost of the financial asset.

If the asset is no longer deteriorating, the the interest income calculation will continue to be calculated by applying the effective interest rate to the amortized cost of the financial asset.

(vi) Reclassification of financial assets

Banks reclassify financial assets if, and only if, the business model for managing financial assets changes. There is no reclassification for financial liabilities.

(vii) Offsetting

Financial assets and liabilities are offset and the net amount is presented in the statement of financial position when, and only when the Bank has a legal right to offset the amounts and intends either to settle on a net basis or to realize the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the company or the counterparty.

Income and expenses are presented on a net basis only when permitted by the Financial Accounting Standards.

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(viii) Pengukuran biaya diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset keuangan atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok pinjaman, ditambah atau dikurangi amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai pengakuan awal dan nilai jatuh temponya, dan dikurangi penurunan nilai.

(ix) Pengukuran nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam transaksi teratur antara pelaku pasar pada tanggal pengukuran.

Pengukuran nilai wajar mengasumsikan bahwa transaksi untuk menjual aset atau mengalihkan liabilitas terjadi:

- Di pasar utama untuk aset dan liabilitas tersebut; atau
- Jika tidak terdapat pasar utama, dipasar yang paling menguntungkan untuk aset atau liabilitas tersebut.

Nilai wajar suatu aset atau liabilitas diukur menggunakan asumsi yang akan digunakan pelaku pasar ketika menentukan harga aset dan liabilitas tersebut dengan asumsi bahwa pelaku pasar bertindak dalam kepentingan ekonomik terbaiknya.

Pengukuran nilai wajar aset non keuangan memperhitungkan kemampuan pelaku pasar untuk menghasilkan manfaat ekonomik dengan menggunakan aset dalam penggunaan tertinggi dan terbaiknya atau dengan menjualnya kepada pelaku pasar lain yang akan menggunakan aset tersebut dalam penggunaan tertinggi dan terbaiknya.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(viii) Amortized cost measurement

The amortized cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal repayments, plus or minus the cumulative amortization using the effective interest rate method of any difference between the initial amount recognized and the maturity amount, minus any reduction for impairment.

(ix) Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

The fair value measurement is based on the presumption that the transaction to sell an asset or paid to transfer a liability takes place either:

- *In the principal market for the assets and liabilities; or*
- *In the absence of a principal market, in the most advantageous market for the asset or liability.*

The fair value of an asset or a liability is measured using the assumptions that market participants would use when determining the price of the asset and liability assuming that market participants act in their own economic best interest.

A fair value measurement of non-financial assets considers a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to other market participants would use the asset in its highest and best use.

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**b. Aset keuangan dan liabilitas keuangan
(lanjutan)**

(ix) Pengukuran nilai wajar (lanjutan)

Bank menggunakan teknik penilaian yang sesuai dalam keadaan dan dimana data yang memadai tersedia untuk mengukur nilai wajar, memaksimalkan penggunaan *input* yang dapat diobservasi yang relevan dan meminimalkan penggunaan input yang tidak dapat diobservasi.

Semua aset dan liabilitas dimana nilai wajar diukur atau diungkapkan dalam laporan keuangan dapat dikategorikan pada level hirarki nilai wajar, berdasarkan tingkatan input terendah yang signifikan atas pengukuran nilai wajar secara keseluruhan:

- Level 1: harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liabilitas yang identik yang dapat diakses pada tanggal pengukuran.
- Level 2: *input* selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung atau tidak langsung.
- Level 3: *input* yang tidak dapat diobservasi untuk aset dan liabilitas.

Untuk aset dan liabilitas yang diakui pada laporan keuangan secara berulang, Bank menentukan apakah terjadi transfer antara level di dalam hirarki dengan cara mengevaluasi kategori berdasarkan *input* level terendah yang signifikan dalam pengukuran nilai wajar setiap akhir periode pelaporan.

Bank untuk tujuan pengungkapan nilai wajar, telah menentukan kelas aset dan liabilitas berdasarkan sifat, karakteristik, risiko aset dan liabilitas, dan level hirarki nilai wajar (Catatan 37).

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

**b. Financial assets and financial liabilities
(continued)**

(ix) Fair value measurement (continued)

Bank uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are classified within fair value hierarchy, based on the lowest level input that is significant to the fair value measurement as a whole:

- Level 1: quoted (unadjusted) market prices in active markets for identical assets or liabilities accessible at the measurement date.
- Level 2: inputs other than quoted prices included in level 1 for the asset and liability, which is directly or indirectly observable.
- Level 3: unobservable inputs for the asset and liability.

For assets and liabilities that are recognised in the financial statements on a recurring basis, Bank determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation based on the lowest level input that is significant to the fair value measurement as a whole at the end of each reporting period.

For the fair value disclosures purposes, Bank has determined classes of assets and liabilities based on the nature, characteristics, risks of the asset and liability, and the level of the fair value hierarchy (Note 37).

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

b. Aset keuangan dan liabilitas keuangan (lanjutan)

(x) Aset keuangan sukuk

Berdasarkan PSAK 110 (Revisi 2015), Bank menentukan klasifikasi investasi pada sukuk sebagai berikut:

a. Diukur pada biaya perolehan

- Investasi tersebut dimiliki dalam suatu model usaha yang bertujuan utama untuk memperoleh arus kas kontraktual dan terdapat persyaratan kontraktual dalam menentukan tanggal tertentu atas pembayaran pokok dan atau hasilnya.
- Biaya perolehan sukuk termasuk biaya transaksi.
- Selisih antara biaya perolehan dan nilai nominal diamortisasi secara garis lurus selama jangka waktu sukuk dan diakui dalam laba rugi.

b. Diukur pada nilai wajar melalui penghasilan komprehensif lain

- Investasi tersebut dimiliki dalam suatu model usaha yang bertujuan utama untuk memperoleh arus kas kontraktual dan melakukan penjualan sukuk, terdapat persyaratan kontraktual dalam menentukan tanggal tertentu atas pembayaran pokok dan atau hasilnya.
- Biaya perolehan sukuk termasuk biaya transaksi.
- Selisih antara biaya perolehan dan nilai nominal diamortisasi secara garis lurus selama jangka waktu sukuk dan diakui dalam laba rugi.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(x) Sukuk Financial Asset

Based on SFAS 110 (Revised 2015), the Bank determines the classification of investments in sukuk are as follows:

a. Measured at cost

- The investment is held in a business model whereby the primary goal is to obtain contractual cash flows and has contractual terms in determining the specific date of principal payments and or the results.
- Sukuk acquisition cost includes transaction cost.
- The difference between the acquisition cost and the nominal value is amortized on a straight-line basis over the period of the sukuk and is recognized in profit or loss.

b. Measured at fair value through other comprehensive income

- The investment is held in a business model whereby the primary goal is to obtain contractual cash flows and to sell the sukuk and has contractual terms in determining the specific date of principal payments and or the results.
- Sukuk acquisition cost includes transaction cost.
- The difference between acquisition cost and the nominal value is amortized on a straight-line basis over the period of the sukuk and is recognized in profit or loss.

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b. Aset keuangan dan liabilitas keuangan (lanjutan)

(x) Aset keuangan sukuk (lanjutan)

Berdasarkan PSAK 110 (Revisi 2015), Bank menentukan klasifikasi investasi pada sukuk sebagai berikut (lanjutan):

b. Diukur pada nilai wajar melalui penghasilan komprehensif lain (lanjutan)

- Keuntungan atau kerugian dari perubahan nilai wajar diakui dalam penghasilan komprehensif lain setelah memperhitungkan saldo selisih biaya perolehan dan nilai nominal yang belum diamortisasi dan saldo akumulasi keuntungan dan kerugian nilai wajar yang telah diakui dalam penghasilan komprehensif lain sebelumnya. Ketika investasi sukuk dihentikan pengakuannya, akumulasi keuntungan atau kerugian yang sebelumnya diakui dalam penghasilan komprehensif lain direklasifikasi ke laba rugi.

c. Diukur pada nilai wajar melalui laba rugi

- Biaya perolehan sukuk tidak termasuk biaya transaksi.
- Selisih antara nilai wajar dan jumlah tercatat diakui dalam laba rugi.

c. Transaksi dengan pihak-pihak berelasi

Bank melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam PSAK 7 (Revisi 2010) tentang "Pengungkapan Pihak-pihak Berelasi".

2. SUMMARY OF ACCOUNTING POLICIES (continued)

b. Financial assets and financial liabilities (continued)

(x) Sukuk financial assets (continued)

Based on SFAS 110 (Revised 2015), the Bank determines the classification of investments in sukuk are as follows (continued):

b. Measured at fair value through other comprehensive income (continued)

- Gain or loss from changes of fair value is recognized in other comprehensive income after considering unamortized difference of acquisition cost and nominal value and accumulated gain or loss of fair value which has previously recognized in other comprehensive income. When sukuk is derecognized, accumulated gain or loss which has previously recognized in other comprehensive income is reclassified to profit or loss.

c. Measured at fair value through profit or loss

- Sukuk acquisition cost does not include transaction cost.
- The difference between fair value and the carrying value is recognized in profit or loss.

c. Transaction with related parties

Bank engage in transactions with related parties as defined in SFAS 7 (Revised 2010) on "Related Party Disclosures".

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c. Transaksi dengan pihak-pihak berelasi (lanjutan)

Suatu pihak dianggap pihak berelasi dengan Bank jika:

- (1) langsung, atau tidak langsung yang melalui satu atau lebih perantara, suatu pihak (i) mengendalikan, atau dikendalikan oleh, atau berada di bawah pengendalian bersama, dengan Bank; (ii) memiliki kepentingan dalam Bank yang memberikan pengaruh signifikan atas Bank; atau (iii) memiliki pengendalian bersama atas Bank;
- (2) suatu pihak yang berada dalam kelompok usaha yang sama dengan Bank;
- (3) suatu pihak adalah ventura bersama di mana Bank sebagai *venturer*;
- (4) suatu pihak adalah anggota dari personil manajemen kunci Bank;
- (5) suatu pihak adalah anggota keluarga dekat dari individu yang diuraikan dalam butir (1) atau (4);
- (6) suatu pihak adalah entitas yang dikendalikan, dikendalikan bersama atau dipengaruhi signifikan oleh atau untuk pihak yang memiliki hak suara signifikan pada beberapa entitas, langsung maupun tidak langsung, yaitu individu seperti diuraikan dalam butir (4) atau (5);
- (7) suatu pihak adalah suatu program imbalan pasca kerja untuk imbalan kerja dari Bank atau entitas yang terkait dengan Bank.

Transaksi dengan pihak-pihak berelasi dilakukan dengan syarat dan kondisi yang sama dengan transaksi-transaksi dengan pihak ketiga. Transaksi yang dilakukan Bank telah memenuhi peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan No. IX.E.1 tentang "Transaksi Afiliasi dan Benturan Kepentingan Transaksi Tertentu", pada saat transaksi-transaksi tersebut dilakukan.

Seluruh transaksi dan saldo yang material dengan pihak-pihak berelasi diungkapkan dalam catatan atas laporan keuangan yang relevan dan rinciannya telah disajikan dalam Catatan 35 atas laporan keuangan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

c. Transaction with related parties (continued)

A party is considered as a related party of the Bank if:

- (1) *directly or indirectly through one or more intermediaries, a party (i) controls, or controlled by, or under common control with the Bank, (ii) has an interest in the Bank that provides significant influence to the Bank, or (iii) has joint control over the Bank;*
- (2) *it is a member of the same group as the Bank;*
- (3) *it is a joint venture in which the Bank acts as a venturer;*
- (4) *it is a member of the key management personnel of the Bank;*
- (5) *it is a close family member of an individual as described in point (1) or (4);*
- (6) *it is an entity that is controlled, jointly controlled or significantly influenced by or for whom has significant voting rights in several entities, directly or indirectly, by the individuals described in point (4) or (5);*
- (7) *it is a post-employment benefit plan program for the employee benefit of either the Bank or entities related to the Bank.*

Transaction with related parties conducted under terms and conditions that similar with third party transactions. These transactions is in accordance with the regulation of Capital Market and Financial Institution Supervisory Agency ("Bapepam-LK") No. IX.E.1 regarding "Transaction with Affiliation and Certain Conflict of Interests" when the transactions are conducted.

All material transactions and balances with related parties are disclosed in the relevant notes to the financial statements and the details have been presented in Note 35 to the financial statements.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

d. Cadangan kerugian penurunan nilai atas aset keuangan

Bank mengakui penyisihan kerugian kredit ekspektasian pada instrumen keuangan yang tidak diukur pada nilai wajar melalui laba rugi.

Tidak ada penyisihan kerugian kredit ekspektasian pada investasi instrumen ekuitas.

Bank mengukur cadangan kerugian sejumlah kerugian kredit ekspektasian seumur hidup, kecuali untuk hal berikut, diukur sejumlah kerugian kredit ekspektasian 12 (dua belas) bulan:

- Instrumen utang yang memiliki risiko kredit rendah pada tanggal pelaporan; dan
- Instrumen keuangan lainnya yang risiko kreditnya tidak meningkat secara signifikan sejak pengakuan awal.

Bank menganggap instrumen utang memiliki risiko kredit yang rendah ketika peringkat risiko kreditnya setara dengan definisi *investment grade* yang dipahami secara global.

Kerugian kredit ekspektasian 12 (dua belas) bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan kerugian kredit ekspektasian yang timbul dari peristiwa gagal bayar instrumen keuangan yang mungkin terjadi dalam 12 (dua belas) bulan setelah tanggal pelaporan.

Kerugian yang terjadi diakui pada laporan laba rugi dan penghasilan komprehensif lain dan dicatat pada akun penyisihan kerugian penurunan nilai sebagai pengurang terhadap aset keuangan yang dicatat pada biaya perolehan diamortisasi. 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 periode berjalan.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

d. Allowance for impairment losses on financial assets

The Bank recognizes allowance for expected credit losses on financial instruments that are not measured at fair value through profit or loss.

There is no allowance for expected credit losses on investment in equity instruments.

The Bank measures the allowance for losses for the lifetime of an expected credit losses, except for the following, which are measured for 12 (twelve) months expected credit losses:

- Debt instruments that have a low credit risk at the reporting date; and
- Other financial instruments whose credit risk has not increased significantly since initial recognition.

The Bank consider debt instruments to have low credit risk when their credit risk rating is equivalent to the globally understood definition of investment grade.

The 12 (twelve) months expected credit losses are part of expected credit losses over their lifespan that represent expected credit losses arising from financial instrument defaults that may occur within 12 (twelve) months after the reporting date.

Losses are recognized in the statement of profit or loss and other comprehensive income and recorded in an allowance for impairment losses account as a deduction for financial assets carried at amortized cost. If in a subsequent period, the amount of the impairment loss decreases and the reduction can be attributed objectively to events occurring after the impairment has been recognized (such as an increase in the credit rating of the debtor or issuer), the previously recognized impairment loss should be recovered, by adjusting the allowance account. The recoverable amount of financial assets is recognized in the statement of profit or loss and other comprehensive income in the current period.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Kerugian kredit ekspektasian untuk instrumen utang yang diukur pada nilai wajar tidak mengurangi nilai tercatat di dalam aset keuangan di laporan posisi keuangan, yaitu nilai wajar. Kerugian kredit ekspektasian diakui sebagai penambah dari penghasilan komprehensif lainnya di dalam laporan posisi keuangan.

Instrumen ekuitas yang diukur pada nilai wajar tidak dilakukan penilaian penurunan nilai sesuai PSAK 71.

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-tahun sebelumnya dicatat sebagai pendapatan operasional selain bunga.

Pengukuran kerugian kredit ekspektasian

Kerugian kredit ekspektasian adalah estimasi probabilitas tertimbang dari kerugian kredit yang diukur sebagai berikut:

- Untuk aset keuangan yang tidak memburuk pada tanggal pelaporan, kerugian kredit ekspektasian diukur sebesar selisih antara nilai kini dari seluruh kekurangan kas (yaitu selisih antara arus kas yang terutang kepada Bank sesuai dengan kontrak dan arus kas yang diperkirakan akan diterima oleh Bank);
- Untuk aset keuangan yang memburuk pada tanggal pelaporan, kerugian kredit ekspektasian diukur sebesar selisih antara jumlah tercatat bruto dan nilai kini arus kas masa depan yang diestimasi;
- Untuk komitmen pinjaman yang belum ditarik, kerugian kredit ekspektasian diukur sebesar selisih antara nilai kini jumlah arus kas jika komitmen ditarik dan arus kas yang diperkirakan akan diterima oleh Bank; dan

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

The expected credit loss for debt instruments measured at fair value does not reduce the carrying value of the financial asset in the statements of financial position, which is the fair value. Expected credit losses are recognized as an addition to other comprehensive income in the statement of financial position.

Equity instruments measured at fair value are not assessed for impairment in accordance with SFAS 71.

Recoveries of financial assets written-off in the current year, is credited by adjusting the allowance for impairment losses account. Recoveries of financial assets written-off in the previous years are recorded as operating income other than interest.

Measurement of expected credit losses

The expected credit losses are the weighted probability estimation of credit losses measured as follows:

- *For financial assets that have not deteriorated at the reporting date, expected credit losses are measured at the difference between the present value of all cash shortages (the difference between cash flows owed to the Bank in accordance with the contract and cash flows that are expected to be received by the Bank);*
- *For financial assets that have deteriorated at the reporting date, expected credit losses are measured at the difference between the gross carrying amount and the present value of estimated future cash flows;*
- *For unused/undrawn loan commitments, expected credit losses are measured at the difference between the present value of the total cash flows if the commitments are withdrawn and the cash flows expected to be received by the Bank; and*

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Pengukuran kerugian kredit ekspektasian (lanjutan)

Kerugian kredit ekspektasian adalah estimasi probabilitas tertimbang dari kerugian kredit yang diukur sebagai berikut (lanjutan):

- Untuk kontrak jaminan keuangan, kerugian kredit ekspektasian diukur sebesar selisih antara pembayaran yang diperkirakan untuk mengganti pemegang atas kerugian kredit yang terjadi dikurangi jumlah yang diperkirakan dapat dipulihkan.

Aset keuangan yang direstrukturisasi

Jika ketentuan aset keuangan dinegosiasikan ulang atau dimodifikasi atau aset keuangan yang ada diganti dengan yang baru karena kesulitan keuangan peminjam, maka dilakukan penilaian apakah aset keuangan yang ada harus dihentikan pengakuannya dan kerugian kredit ekspektasian diukur sebagai berikut:

- Jika restrukturisasi tidak mengakibatkan penghentian pengakuan aset yang ada, maka arus kas yang diperkirakan timbul dari aset keuangan yang dimodifikasi dimasukkan dalam perhitungan kekurangan kas dari aset yang ada.
- Jika restrukturisasi akan menghasilkan penghentian pengakuan aset yang ada, maka nilai wajar aset baru diperlakukan sebagai arus kas akhir dari aset keuangan yang ada pada saat penghentian pengakuannya. Jumlah ini dimasukkan dalam perhitungan kekurangan kas dari aset keuangan yang ada yang didiskontokan dari tanggal penghentian pengakuan ke tanggal pelaporan menggunakan suku bunga efektif awal dari aset keuangan yang ada.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Measurement of expected credit losses (continued)

The expected credit losses are the weighted probability estimation of credit losses measured as follows (continued):

- For financial guarantee contracts, expected credit losses are measured at the difference between payments estimated to replace the holders for credit losses incurred less the amount that is expected to be recoverable.

Restructured financial assets

If the terms of financial assets are renegotiated or modified or existing financial assets are replaced with new ones because of the borrower's financial difficulties, an assessment is made of whether the existing financial assets should be derecognized and the expected credit losses are measured as follows:

- If the restructuring does not result in derecognition of the existing asset, the estimated cash flows arising from the modified financial asset are included in the calculation of the cash deficiency of the existing asset.
- If the restructuring will result in derecognition of an existing asset, the fair value of the new asset is treated as the final cash flow of the existing financial asset on derecognition. This amount is included in the calculation of the cash shortage of the existing financial asset which is discounted from the derecognition date to the reporting date using the initial effective interest rate of the existing financial asset.

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset keuangan yang memburuk

Pada setiap tanggal pelaporan, Bank menilai apakah aset keuangan yang dicatat pada biaya perolehan diamortisasi dan aset keuangan instrumen utang yang dicatat pada nilai wajar melalui penghasilan komprehensif lain mengalami penurunan nilai kredit (memburuk). Aset keuangan memburuk ketika satu atau lebih peristiwa yang memiliki dampak merugikan atas estimasi arus kas masa depan dari aset keuangan telah terjadi.

Bukti bahwa aset keuangan mengalami penurunan nilai kredit (memburuk) termasuk data yang dapat diobservasi mengenai peristiwa berikut ini:

- (1) Kesulitan keuangan signifikan yang dialami penerbit atau pihak peminjam;
- (2) Pelanggaran kontrak, seperti peristiwa gagal bayar atau peristiwa tunggakan;
- (3) Pihak pemberi pinjaman, untuk alasan ekonomik atau kontraktual sehubungan dengan kesulitan keuangan yang dialami pihak peminjam, telah memberikan konsesi pada pihak peminjam yang tidak mungkin diberikan jika pihak peminjam tidak mengalami kesulitan tersebut;
- (4) Terjadi kemungkinan bahwa pihak peminjam akan dinyatakan pailit atau melakukan reorganisasi keuangan lainnya;
- (5) Hilangnya pasar aktif dari aset keuangan akibat kesulitan keuangan;
- (6) Pembelian atau penerbitan aset keuangan dengan diskon sangat besar yang mencerminkan kerugian kredit yang terjadi; atau
- (7) Sulit untuk mengidentifikasi peristiwa diskrit tunggal, namun demikian, dampak kombinasi dari beberapa peristiwa dapat menyebabkan aset keuangan mengalami penurunan nilai kredit.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Deteriorating financial assets

At each reporting date, the Bank assesses whether financial assets carried at amortized cost and debt financial assets carried at fair value through other comprehensive income are impaired (deteriorated). A financial asset deteriorates when one or more events that have an adverse effect on the estimated future cash flows of the financial asset have occurred.

Evidence that a financial asset is credit impaired (deteriorating) includes observable data regarding the following events:

- (1) Significant financial difficulties experienced by the issuer or borrower;
- (2) Breach of contract, such as an event of default or arrears;
- (3) The lender, for economic or contractual reasons in connection with the borrower's financial difficulties, has given the borrower a concession that would not have been possible if the borrower had not experienced such difficulties;
- (4) There is a possibility that the borrower will enter bankruptcy or other financial reorganization;
- (5) The disappearance of an active market for a financial asset due to financial difficulties;
- (6) The purchase or issuance of financial assets at a deep discount that reflects the credit losses incurred; or
- (7) It is difficult to identify a single discrete event, however, the combined effect of several events can cause a financial asset to be impaired on credit.

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset keuangan yang dibeli atau yang berasal dari aset keuangan memburuk (purchased or originated credit-impaired financial assets - POCI)

Aset keuangan dikategorikan sebagai POCI apabila terdapat bukti objektif penurunan nilai pada saat pengakuan awal. Pada saat pengakuan awal, tidak ada penyisihan kerugian kredit yang diakui karena harga pembelian atau nilainya telah termasuk estimasi kerugian kredit sepanjang umurnya. Selanjutnya, perubahan kerugian kredit sepanjang umurnya, baik positif atau negatif, diakui dalam laporan laba rugi sebagai bagian dari penyisihan kerugian kredit.

Berdasarkan proses di atas, Bank melakukan pembagian aset keuangan atas *Stage 1*, *Stage 2*, *Stage 3* dan POCI, sebagai berikut:

- *Stage 1*: mencakup instrumen keuangan yang tidak memiliki peningkatan risiko kredit secara signifikan sejak pengakuan awal atau memiliki risiko kredit rendah pada tanggal pelaporan. Untuk instrumen-instrumen keuangan ini, akan berlaku perhitungan ECL 12 bulan. Aset keuangan didalam *stage 1* termasuk fasilitas dimana risiko kredit telah membaik dan aset keuangan dapat direklasifikasi dari *stage 2*.
- *Stage 2*: mencakup instrumen keuangan yang mengalami peningkatan risiko kredit sejak pengakuan awal (kecuali Bank merasa risiko kredit tergolong rendah pada tanggal pelaporan) namun belum terbukti adanya bukti penurunan nilai secara objektif. Untuk instrumen-instrumen ini, akan berlaku perhitungan ECL seumur hidup. ECL seumur hidup adalah kerugian kredit ekspektasian yang diharapkan dari semua kejadian gagal bayar yang mungkin terjadi selama perkiraan umur dari instrumen keuangan tersebut. *Stage 2* juga mencakup fasilitas dimana risiko kredit telah membaik dan aset keuangan telah direklasifikasi dari *Stage 3*.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Purchased or originated credit-impaired financial assets (POCI)

A financial asset is categorized as POCI if there is objective evidence of impairment at initial recognition. At initial recognition, no allowance for credit losses is recognized because the purchase price or value includes the estimated lifetime credit losses. Furthermore, changes in credit losses over their lifetime, whether positive or negative, are recognized in the income statement as part of the allowance for credit losses.

Based on the above process, the Bank distributes financial assets into *Stage 1*, *Stage 2*, *Stage 3* and POCI, as follows:

- *Stage 1*: includes financial instruments that do not have a significant increase in credit risk since initial recognition or have low credit risk at the reporting date. For these financial instruments a 12-month ECL calculation will apply. Financial assets in stage 1 include facilities where credit risk has improved and financial assets that can be reclassified from stage 2.
- *Stage 2*: includes financial instruments that experience an increase in credit risk since initial recognition (unless the Bank feel that credit risk is classified as low at the reporting date) but there is no objective evidence of impairment yet. For these instruments, lifetime ECL calculations will apply. Lifetime ECL is the expected credit loss expected from all default events that may occur during the estimated life of the financial instrument. Stage 2 also includes facilities where credit risk has improved and financial assets have been reclassified from Stage 3.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset keuangan yang dibeli atau yang berasal dari aset keuangan memburuk (purchased or originated credit-impaired financial assets - POCI) (lanjutan)

Berdasarkan proses di atas, Bank melakukan pembagian aset keuangan atas *Stage 1*, *Stage 2*, *Stage 3* dan POCI, sebagai berikut (lanjutan):

- *Stage 3*: mencakup instrumen keuangan yang telah terbukti mengalami penurunan nilai secara objektif pada tanggal pelaporan. Kelompok ini biasanya terdiri atas debitur yang mengalami gagal bayar. Bank mencatat cadangan ECL seumur hidup.
- POCI: aset POCI adalah aset keuangan yang mengalami penurunan nilai berdasarkan penilaian risiko kredit pada saat pengakuan awal. Aset tersebut dicatat pada nilai wajar pada saat pengakuan awal, dan pendapatan bunga akan diakui selanjutnya berdasarkan metode suku bunga efektif yang disesuaikan. Cadangan ECL hanya dicatat atau dilepaskan jika ada perubahan selanjutnya pada kerugian kredit ekspektasian.

Terdapat kriteria kualitatif dan kuantitatif untuk memastikan aset keuangan tercakup dalam *stage* tertentu yang telah diformalkan di dalam Surat Edaran Bank.

Bank menghitung penurunan nilai melalui dua metode, yaitu penurunan nilai secara individual atau kolektif. Perhitungan penurunan nilai secara individual dilakukan untuk aset keuangan yang signifikan, yaitu dengan total eksposur aset keuangan di atas Rp5.000.000.000 (nilai penuh) dan pernah mengalami gagal bayar ataupun restrukturisasi. Selain itu, perhitungan penurunan nilai akan dilakukan secara kolektif.

Penurunan nilai individual

Metode perhitungan penurunan nilai secara individual akan mempertimbangkan 3 (tiga) skenario kemungkinan pengembalian, yaitu: (i) skenario dasar (*Base*), (ii) skenario buruk (*Bad*), dan (iii) skenario terburuk (*Worst*).

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Purchased or originated credit-impaired financial assets (POCI) (continued)

Based on the above process, the Bank distributes financial assets into *Stage 1*, *Stage 2*, *Stage 3* and POCI, as follows (continued):

- *Stage 3*: includes financial instruments that have been proved to be objectively impaired at the reporting date. This group usually consists of debtors who have defaulted on their payments. The bank records lifetime ECL reserves.
- POCI: POCI assets are financial assets that are impaired based on a credit risk assessment on initial recognition. Such assets are carried at fair value on initial recognition, and interest income is recognized subsequently using the adjusted effective interest rate method. ECL reserves are only recorded or released if there are further changes to expected credit losses.

There are qualitative and quantitative criteria to ensure that financial assets are covered in certain stages which have been formalized in the Bank Circular Letter.

The Bank calculates impairment through two methods, which is individual or collective impairment. Individual impairment calculations are performed for significant financial assets, with total exposure to financial assets of more than Rp5,000,000,000 (full amount) and have experienced default or restructuring. Other than that, the calculation of impairment will be carried out collectively.

Individual impairment

The method of calculating impairment individually will consider 3 (three) possible return scenarios, namely: (i) the basic scenario (*Base*), (ii) the bad scenario (*Bad*), and (iii) the worst scenario (*Worst*).

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Penurunan nilai individual (lanjutan)

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.

Penurunan nilai kolektif

Evaluasi penurunan nilai secara kolektif didasarkan pada konsep *Probability of Default* (PD), *Loss Given Default* (LGD) dan *Exposure at Default* (EAD) yang mempertimbangkan informasi masa lalu, terkini, dan masa mendatang.

Bank menggunakan model (i) *Credit Index* dan (ii) *Vasicek* maupun pendekatan lainnya dalam menentukan nilai PD dari setiap debitur.

Bank menggunakan metode (i) *Historical* dan (ii) *Diminish Balance* dalam menentukan nilai LGD dari setiap debitur. LGD menggambarkan persentase nominal fasilitas yang tidak akan dapat di-recover oleh Bank terhadap debitur default. LGD biasa dihitung dengan *1-Recovery Rate*. *Recovery rate* dihitung mempertimbangkan *Time Value of Money* dari pengembalian dari kewajiban yang telah default. Tingkat suku bunga yang digunakan untuk menghitung *Time Value of Money* dari *Recovery* adalah EIR awal.

EAD merupakan estimasi nilai buku pada saat terjadi gagal bayar, dengan mempertimbangkan arus kas instrumen keuangan terkait, serta kemungkinan penarikan tambahan dari limit kredit sampai dengan tanggal gagal bayar.

EAD juga mempertimbangkan jadwal pembayaran dan amortisasi serta perubahan dalam utilisasi saldo yang belum ditarik menjelang terjadinya kegagalan bayar.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Individual impairment (continued)

The scenario is created using the *Discounted Cash Flow* (DCF) method and considers the *confidence level* that reflects the conditions of the industries and the related companies. Later, the ECL generated by each scenario will be weighted averaged to the weight of the scenario that has been set.

Collective impairment

Collective impairment evaluation is based on the concepts of *Probability of Default* (PD), *Loss Given Default* (LGD) and *Exposure at Default* (EAD) which take into account past, current, and future information.

The Bank uses the (i) *Credit Index* and (ii) *Vasicek* model as well as other approaches in determining the PD value of each debtor.

The Bank uses the (i) *Historical* and (ii) *Diminish Balance* method in determining the LGD value of each debtor. LGD describes the nominal percentage of the facility that the Bank will not be able to recover from the default debtor. The usual LGD is calculated at *1-Recovery Rate*. The recovery rate is calculated by considering the *Time Value of Money* from the return of the default obligation. The interest rate used to calculate the *Time Value of Money* from *Recovery* is the initial EIR.

EAD is an estimate of the book value at the time of default, taking into account the cash flows of the related financial instrument, as well as the possibility of additional withdrawals from the credit limit up to the date of default.

EAD also considers payment and amortization schedules as well as changes in the utilization of outstanding balances prior to default.

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Penurunan nilai kolektif (lanjutan)

Pemodelan EAD akan dilakukan berdasarkan karakteristik dari instrumen keuangan terkait, yang dibagi ke dalam beberapa kategori: (i) kredit angsuran (ii) kredit *revolving*, (iii) *trade finance* dan (iv) *treasury*.

Pengukuran ECL berdasarkan PSAK 71 mewajibkan Bank untuk memodelkan ECL sesuai dengan skenario *forward-looking* yang ada, dengan mempertimbangkan kemungkinan ekonomi baik dan buruk. Oleh karena itu, nilai ECL yang dihasilkan Bank harus berdasarkan hasil probabilitas dari tiga skenario (kasus ekonomi *normal/normal*, *baik/good* dan *buruk/bad*). PD dan LGD akan dihitung menurut tiga skenario dengan nilai makro-ekonomi sesuai dengan skenario-skenario tersebut.

Untuk segmentasi beragunan (*secured*), LGD juga akan dihitung berdasarkan tiga skenario ketika data sudah mencukupi. Bobot dari skenario baik, normal dan buruk dapat disesuaikan seiring dengan perubahan kondisi ekonomi dan diskresi Bank.

Penyajian penyisihan kerugian kredit ekspektasian dalam laporan posisi keuangan

Penyisihan kerugian kredit ekspektasian disajikan dalam laporan posisi keuangan sebagai berikut:

- Aset keuangan yang diukur pada biaya perolehan diamortisasi, penyisihan kerugian kredit ekspektasian disajikan sebagai pengurang dari jumlah tercatat bruto aset;
- Komitmen pinjaman dan kontrak jaminan keuangan, umumnya penyisihan kerugian kredit ekspektasian disajikan sebagai provisi;

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Collective impairment (continued)

EAD modeling will be carried out based on the characteristics of the related financial instruments, which are divided into several categories: (i) installment loans (ii) revolving loans, (iii) trade finance and (iv) treasury.

The measurement of ECL based on SFAS 71 requires the Bank to model the ECL according to the existing forward-looking scenario, taking into account good and bad economic possibilities. Therefore, the ECL value generated by the Bank must be based on the probability results of three scenarios (normal, good and bad economic cases). PD and LGD will be calculated according to three scenarios with macro-economic values in accordance with these scenarios.

For secured segmentation, LGD will also be calculated based on three scenarios when the data is sufficient. The weights of the good, normal and bad scenarios can be adjusted according to changes in economic conditions and the Bank's discretion.

Presentation of allowance for expected credit losses in the statement of financial position

Allowance for expected credit losses is presented in the statement of financial position as follows:

- Financial assets measured at amortized cost, the allowance for expected credit losses is presented as a deduction from the gross carrying amount of the assets;
- Loan commitments and financial guarantee contracts, generally the allowance for expected credit losses is presented as a provision;

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Penyajian penyisihan kerugian kredit ekspektasian dalam laporan posisi keuangan (lanjutan)

Penyisihan kerugian kredit ekspektasian disajikan dalam laporan posisi keuangan sebagai berikut (lanjutan):

- Instrumen keuangan yang mencakup komponen komitmen pinjaman yang telah ditarik dan belum ditarik, dan Bank tidak dapat mengidentifikasi kerugian kredit ekspektasian komponen komitmen pinjaman yang telah ditarik secara terpisah dari komponen komitmen pinjaman yang belum ditarik, maka penyisihan kerugian kredit ekspektasian tersebut digabungkan dan disajikan sebagai pengurang dari jumlah tercatat bruto. Setiap kelebihan dari penyisihan kerugian kredit ekspektasian atas jumlah bruto disajikan sebagai provisi; dan
- Instrumen hutang yang diukur pada nilai wajar melalui penghasilan komprehensif lain, penyisihan kerugian kredit ekspektasian tidak diakui dalam laporan posisi keuangan karena jumlah tercatat dari aset-aset ini adalah nilai wajarnya. Namun demikian penyisihan kerugian kredit ekspektasian diungkapkan dan diakui dalam penghasilan komprehensif lain komponen nilai wajar.

Penghapusan

Pinjaman dan instrumen hutang dihapusbukukan ketika tidak ada prospek yang realistis untuk memulihkan aset keuangan secara keseluruhan atau secara parsial. Hal ini pada umumnya terjadi ketika Bank menentukan bahwa peminjam tidak memiliki aset atau sumber penghasilan yang dapat menghasilkan arus kas yang cukup untuk membayar jumlah yang dihapusbukukan.

Namun demikian, aset keuangan yang dihapusbukukan masih bisa dilakukan tindakan penyelamatan sesuai dengan prosedur Bank dalam rangka pemulihan jumlah yang jatuh tempo.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

d. Allowance for impairment losses on financial assets (continued)

Presentation of allowance for expected credit losses in the statement of financial position (continued)

Allowance for expected credit losses is presented in the statement of financial position as follows (continued):

- Financial instruments that include components of loan commitments that have been drawn and not yet drawn, and the Bank is unable to identify expected credit losses from loan commitment components that have been drawn separately from the undisbursed components of loan commitments, then the allowance for expected credit losses is combined and presented as a deduction of the gross carrying amount. Any excess of allowance for expected credit losses over the gross amount is presented as a provision; and
- For debt instruments measured at fair value through other comprehensive income, allowance for expected credit losses is not recognized in the statement of financial position because the carrying amount of these assets is their fair value. However, the allowance for expected credit losses is disclosed and recognized in other comprehensive income, the fair value component.

Write-off

Loans and debt instruments are written off when there are no realistic prospects for recovering the financial asset in whole or in part. This generally occurs when the Bank determines that the borrower does not have assets or sources of income that can generate sufficient cash flow to pay the written-off amount.

However, financial assets that are written-off can still be taken in accordance with Bank procedures in order to recover the amount due.

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d. Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Penghapusan (lanjutan)

Sehubungan dengan kepatuhan terhadap Bank Indonesia/Otoritas Jasa Keuangan, Bank menerapkan Peraturan Otoritas Jasa Keuangan No. 40/POJK.03/2019 tanggal 19 Desember 2019 tentang "Penilaian Kualitas Aset Bank Umum".

Kriteria penilaian nilai agunan yang dapat dikurangkan dalam perhitungan cadangan kerugian penurunan nilai sesuai dengan Peraturan Otoritas Jasa Keuangan (OJK).

e. 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 cadangan kerugian penurunan nilai. Giro pada Bank Indonesia dan bank lain diklasifikasikan sebagai biaya perolehan diamortisasi.

f. Penempatan pada Bank Indonesia dan bank lain

Penempatan pada Bank Indonesia terdiri dari penanaman dana pada Bank Indonesia berupa *Deposit Facility* dan *Term Deposit*, sedangkan penempatan dana pada bank lain merupakan penanaman dana dalam bentuk penempatan pada pasar uang (*inter-bank call money*) dan tabungan.

Penempatan pada Bank Indonesia dan bank lain dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai. Penempatan pada Bank Indonesia dan bank lain diklasifikasikan sebagai biaya perolehan diamortisasi.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

d. Allowance for impairment losses on financial assets (continued)

Write-off (continued)

With regard to compliance with Bank Indonesia/Financial Service Authority, the Bank has implemented the Financial Services Authority Regulation No. 40/POJK.03/2019 dated December 19, 2019 concerning "Asset Quality Assessment for Commercial Banks".

The criteria for assessing the value of deductible collateral in the calculation of allowance for impairment losses are in accordance with the Financial Services Authority (OJK) Regulation.

e. Current accounts with Bank Indonesia and other banks

Current accounts with Bank Indonesia and other banks are stated at amortized cost using the effective interest method less allowance for impairment losses. Current accounts with Bank Indonesia and other banks are classified as amortized cost.

f. Placements with Bank Indonesia and other Banks

Placements with Bank Indonesia consists of placements in the form of *Deposit Facility* and *Term Deposit*, while placements with other banks represent placements in the form of *inter-bank call money* and *saving deposits*.

Placements with Bank Indonesia and other banks are stated at amortized cost using the effective interest rate method less allowance for impairment losses. Placements with Bank Indonesia and other banks are classified as amortized cost.

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g. Efek-efek

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia, Surat Perbendaharaan Negara, Obligasi Pemerintah, unit penyertaan reksadana, *Medium-Term Note*, *Negotiable Certificate Deposit* dan obligasi lain yang diperoleh melalui pasar perdana dan sekunder.

Efek-efek pada awalnya disajikan sebesar nilai wajarnya. Setelah pengakuan awal, efek-efek dicatat sesuai dengan kategorinya yaitu biaya perolehan diamortisasi, nilai wajar melalui penghasilan komprehensif lain atau nilai wajar melalui laba rugi.

Penilaian efek-efek didasarkan atas klasifikasinya sebagai berikut:

- (1) Efek-efek yang dimiliki hingga jatuh tempo dicatat pada biaya perolehan yang diamortisasi menggunakan suku bunga efektif.
- (2) Efek-efek yang diperdagangkan dinyatakan pada nilai wajar. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar efek-efek diakui dalam laporan laba rugi dan penghasilan komprehensif lain.
- (3) Efek-efek yang diklasifikasikan sebagai nilai wajar melalui penghasilan komprehensif lain dinyatakan pada nilai wajar. Pendapatan bunga diakui dalam laporan laba rugi dan penghasilan komprehensif lain menggunakan suku bunga efektif. Laba atau rugi selisih kurs atas efek-efek diakui pada laporan laba rugi dan penghasilan komprehensif lain. Perubahan nilai wajar lainnya diakui secara langsung dalam ekuitas sampai dengan efek-efek tersebut dijual atau mengalami penurunan nilai, dimana keuntungan dan kerugian kumulatif yang sebelumnya diakui dalam ekuitas harus diakui pada laporan laba rugi dan penghasilan komprehensif lain.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

g. Securities

Securities consist of Certificates of Bank Indonesia, Government Treasury Bills, Government bonds, mutual fund units, Medium-Term Note, Negotiable Certificate Deposit and other bonds acquired through the primary and secondary markets.

Securities initially are stated at fair value. After initial recognition, securities are recorded according to their categories, which is amortized cost, fair value through other comprehensive income or fair value through profit or loss.

The valuation of securities is based on the classification as follows:

- (1) Securities that are held until maturity are stated at amortized cost using the effective interest method.*
- (2) Securities that are held for trading are stated at fair value. Gains and losses arising from changes in fair value of securities are recognized in the statements of profit or loss and other comprehensive income.*
- (3) Securities classified as fair value through other comprehensive income are stated at fair value. Interest income is recognized in the statements of profit or loss and other comprehensive income using the effective interest method. Foreign exchange gains or losses on marketable securities are recognized in the statements of profit or loss and other comprehensive income. Other fair value changes are recognized directly in equity until the securities are sold or impaired, whereby the cumulative gains and losses previously recognized in equity are recognized in the statement of profit or loss and other comprehensive income.*

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h. Efek-efek yang dibeli dengan janji dijual kembali

Efek-efek yang dibeli dengan janji untuk dijual kembali disajikan sebagai aset keuangan dalam laporan posisi keuangan sebesar jumlah penjualan kembali dikurangi dengan bunga yang belum diamortisasi dan cadangan kerugian penurunan nilai.

Selisih antara harga beli dan harga jual kembali diperlakukan sebagai pendapatan bunga yang ditangguhkan (belum diamortisasi) dan diakui sebagai pendapatan selama periode sejak efek-efek tersebut dibeli hingga dijual kembali dengan menggunakan suku bunga efektif.

Efek-efek yang dibeli dengan janji untuk dijual kembali diklasifikasikan sebagai biaya perolehan diamortisasi.

i. Kredit yang diberikan

Kredit yang diberikan adalah penyediaan uang atau tagihan yang dapat disetarakan dengan itu, berdasarkan persetujuan atau kesepakatan pinjam-meminjam dengan debitur yang mewajibkan debitur untuk melunasi utangnya setelah jangka waktu tertentu dan membayar imbalan bunga.

Kredit yang diberikan pada awalnya diukur pada nilai wajar ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung dan merupakan biaya tambahan untuk memperoleh aset keuangan tersebut, dan setelah pengakuan awal diukur pada biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi dengan cadangan kerugian penurunan nilai.

Kredit yang diberikan diklasifikasikan sebagai biaya perolehan diamortisasi.

Kredit dalam rangka pembiayaan bersama (kredit sindikasi) dinyatakan sebesar pokok kredit sesuai dengan porsi risiko yang ditanggung oleh Bank.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

h. Securities purchased under agreement to resell

Securities purchased under agreement to resell are presented as financial assets in the statement of financial position, at the net resale price of unamortized interest and net of allowance for impairment losses.

The difference between the purchase price and the resale price is treated as unearned interest income (unamortized) and recognized as income over the period starting from when those securities are purchased until they are resold using effective interest rate.

Securities purchased under agreement to resell are classified as amortized cost.

i. Loans

Loans represent the lending of money or equivalent receivables, under contract or borrowing and lending commitment with debtors, whereby the debtors are required to repay their debts with interest after a specified period of time.

Loans are initially measured at fair value plus transaction costs that are directly attributable and is the additional costs to obtain the financial assets, and after initial recognition are measured at amortized cost based on the effective interest rate method less allowance for impairment losses.

Loans are classified as amortized cost.

Loans extended under syndication agreements are recognized at the nominal amount to the extent of the risks, borne by the Bank.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

i. Kredit yang diberikan (lanjutan)

Kredit yang direstrukturisasi disajikan sebesar nilai yang lebih rendah antara nilai tercatat kredit pada tanggal restrukturisasi atau nilai tunai penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat kredit pada tanggal restrukturisasi dan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui dalam laporan laba rugi dan penghasilan komprehensif lain. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok kredit yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

Kredit yang diberikan dihapusbukukan ketika 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. Pelunasan kemudian atas kredit yang telah dihapusbukukan sebelumnya, dikreditkan ke cadangan kerugian penurunan nilai di laporan posisi keuangan.

j. Wesel ekspor dan tagihan lainnya

Wesel ekspor dan tagihan lainnya adalah wesel ekspor yang dinegosiasikan secara diskonto dan dijaminan oleh bank lainnya sedangkan tagihan lainnya merupakan tagihan ataupun dokumen penagihan dalam bentuk wesel/*bill of exchange* atau dokumen lain kepada pihak tertagih/*drawee* atas dasar diskonto ataupun suatu pembiayaan tertentu.

Wesel ekspor dan tagihan lainnya dicatat pada biaya perolehan amortisasi setelah dikurangi cadangan kerugian penurunan nilai.

k. Tagihan dan liabilitas akseptasi

Tagihan dan liabilitas akseptasi merupakan transaksi *letter of credit* (L/C) dan Surat Kredit Berdokumen Dalam Negeri (SKBDN) yang diaksep oleh bank pengaksep (accepting bank).

2. SUMMARY OF ACCOUNTING POLICIES (continued)

i. Loans (continued)

Restructured loans are stated at the lower of carrying value on the date of restructuring or net present value of the total future cash receipts after restructuring. Losses arising from any excess of the carrying value of the loan at the time of restructuring over the net present value of the total future cash receipts after restructuring are recognized in the statement of profit or loss and other comprehensive income. Thereafter, all cash receipts under the new terms shall be accounted for as the recovery of principal and interest income, in accordance with the restructuring scheme.

Loans are written-off when there are no realistic prospect of future recovery and all collateral have been realized or have been foreclosed. When loans are deemed uncollectible, it is written-off against the related allowance for impairment losses. Subsequent recoveries of loans written-off are credited to the allowance for impairment losses in the statements of financial position.

j. Export bills and other receivables

Export bills and other receivables are export bills negotiated at a discount and guaranteed by other banks, while other receivables are claims or billing documents in the form of bills/bills of exchange or any other documents to collectible parties/drawee on a discount basis or certain financing.

Export bills and other receivables are carried at amortized cost, less allowance for impairment losses.

k. Acceptances receivable and payable

Acceptances receivable and payable represent letter of credit (L/C) and Domestic Documentary Letters of Credit transactions that have been accepted by the accepting bank.

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k. Tagihan dan liabilitas akseptasi (lanjutan)

Tagihan akseptasi dinyatakan sebesar biaya perolehan diamortisasi dan disajikan setelah dikurangi cadangan kerugian penurunan nilai.

Liabilitas akseptasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

l. Penyertaan saham

Penyertaan saham terutama merupakan penanaman dana dalam bentuk saham pada perusahaan yang tidak melalui pasar modal untuk tujuan investasi jangka panjang.

Penyertaan saham pada entitas dimana Bank tidak memiliki pengaruh yang signifikan dicatat pada nilai wajar sesuai dengan PSAK 71.

Dividen kas yang diterima atas penyertaan saham diakui sebagai pendapatan.

m. Aset tetap, aset hak guna dan liabilitas sewa serta aset tidak berwujud

Aset tetap

Aset tetap awalnya diakui sebesar biaya perolehan, yang terdiri atas harga perolehan dan biaya-biaya tambahan yang dapat diatribusikan langsung untuk membawa aset ke lokasi dan kondisi yang diinginkan supaya aset tersebut siap digunakan sesuai dengan maksud manajemen.

Setelah pengakuan awal, aset tetap dinyatakan pada biaya perolehan dikurangi akumulasi penyusutan dan akumulasi rugi penurunan nilai.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

k. Acceptances receivable and payable (continued)

Acceptances receivable are stated at amortized cost and presented as net of allowance for impairment losses.

Acceptances payable are classified as financial liabilities measured at amortized cost.

l. Investment in shares of stocks

Investment in shares of stocks represent investment of funds in the form of shares of non public companies for long-term investment purposes.

Investment in shares of stocks in which the Bank does not have any significant influence is recorded at fair value in accordance with SFAS 71.

Cash dividends received from investment in shares of stocks are recognized as income.

m. Premises and equipments, right-of-use assets and lease liabilities and intangible assets

Premises and equipments

Premises and equipments are initially recognized at cost, which comprises its purchase price and any costs directly attributable in bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

Subsequent to initial recognition, premises and equipments are carried at cost less any subsequent accumulated depreciation and impairment losses.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

m. Aset tetap, aset hak guna dan liabilitas sewa serta aset tidak berwujud (lanjutan)

Aset tetap (lanjutan)

Aset tetap yang diperoleh dalam pertukaran aset non-moneter atau kombinasi aset moneter dan non-moneter diukur pada nilai wajar, kecuali:

- (i) transaksi pertukaran tidak memiliki substansi komersial, atau
- (ii) nilai wajar dari aset yang diterima dan diserahkan tidak dapat diukur secara andal.

Penyusutan aset dimulai pada saat aset tersebut siap untuk digunakan sesuai maksud penggunaannya dan dihitung dengan menggunakan metode garis lurus berdasarkan estimasi umur manfaat ekonomis sebagai berikut:

	Tahun/Years
Bangunan	20-30
Renovasi bangunan sewa	5
Kendaraan	5
Perlengkapan kantor	5

Penilaian aset tetap dilakukan atas penurunan dan kemungkinan penurunan nilai wajar aset jika terjadi peristiwa atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat mungkin tidak dapat seluruhnya terealisasi.

Jumlah tercatat komponen dari suatu aset tetap dihentikan pengakuannya pada saat dilepaskan atau saat sudah tidak ada lagi manfaat ekonomik masa depan yang diekspektasikan dari penggunaan maupun pelepasannya. Laba atau rugi yang timbul dari penghentian pengakuan tersebut dimasukkan kedalam laba rugi untuk tahun dimana penghentian pengakuan tersebut dilakukan.

Nilai residu, umur manfaat dan metode penyusutan dievaluasi setiap akhir tahun dan disesuaikan secara prospektif, jika diperlukan.

Tanah dinyatakan sebesar biaya perolehan dan tidak disusutkan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

m. Premises and equipments, right-of-use assets and lease liabilities and intangible assets (continued)

Premises and equipments (continued)

Premises and equipments acquired in exchange for a non-monetary asset or for a combination of monetary and non-monetary assets are measured at fair values, unless:

- (i) the exchange transaction lacks commercial substance, or
- (ii) neither the fair value of the assets received nor the assets given up can be measured reliably.

Depreciation of an asset starts when it is ready to use and is computed using the straight-line method based on the estimated economic useful lives of the assets as follows:

	Persentase/Percentage	
Bangunan	3,33-5%	Buildings
Renovasi bangunan sewa	20%	Office leasehold improvements
Kendaraan	20%	Vehicles
Perlengkapan kantor	20%	Office equipments

The carrying amounts of premises and equipments are reviewed for impairment and probability of impairment when events or changes in circumstances indicate that the carrying values may not be fully recoverable.

The carrying amount of an item of premises and equipments is derecognized 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 is directly included in the profit or loss when the item is derecognized.

The asset residual value, useful life and depreciation method are evaluated at each year end and adjusted prospectively, if necessary.

Land are stated at cost and not depreciated.

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m. Aset tetap, aset hak guna dan liabilitas sewa serta aset tidak berwujud (lanjutan)

Aset tetap (lanjutan)

Jika biaya perolehan tanah termasuk biaya pembongkaran, pemindahan dan restorasi lokasi, serta manfaat yang diperoleh dari pembongkaran, pemindahan dan pemugaran tersebut terbatas, maka biaya tersebut disusutkan selama periode manfaat yang diperolehnya. Dalam beberapa kasus, tanah itu sendiri memiliki umur manfaat yang terbatas, dalam hal ini, tanah tersebut disusutkan dengan cara yang mencerminkan manfaat yang diperoleh dari tanah tersebut.

Beban pemeliharaan dan perbaikan dibebankan pada operasi pada saat terjadinya. Beban pemugaran dan penambahan dalam jumlah besar dikapitalisasi kepada jumlah tercatat aset tetap terkait bila besar kemungkinan bagi Bank manfaat ekonomi masa depan menjadi lebih besar dari standar kinerja awal yang ditetapkan sebelumnya dan disusutkan sepanjang sisa masa manfaat aset tetap terkait.

Aset tetap dalam penyelesaian dicatat sebesar biaya perolehan, yang mencakup kapitalisasi beban pinjaman dan biaya-biaya lainnya yang terjadi sehubungan dengan pendanaan aset tetap dalam penyelesaian tersebut. Akumulasi biaya perolehan akan direklasifikasi ke akun "Aset Tetap" yang bersangkutan pada saat aset tetap tersebut telah selesai dikerjakan dan siap untuk digunakan. Aset tetap dalam penyelesaian tidak disusutkan karena belum tersedia untuk digunakan.

Biaya pengurusan legal hak atas tanah dalam bentuk Hak Guna Usaha (HGU), Hak Guna Bangunan (HGB) dan Hak Pakai (HP) ketika tanah diperoleh pertama kali diakui sebagai bagian dari biaya perolehan tanah pada akun "Aset Tetap". Biaya pengurusan perpanjangan atau pembaruan legal hak atas tanah diakui sebagai aset tidak berwujud dan diamortisasi sepanjang umur hak hukum atau umur ekonomi tanah, mana yang lebih pendek.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

m. Premises and equipments, right-of-use assets and lease liabilities and intangible assets (continued)

Premises and equipments (continued)

If the cost of land includes the costs of site dismantlement, removal and restoration, and the benefits from the site dismantlement, removal and restoration is limited, that cost is depreciated over the period of benefits obtained. In some cases, the land itself may have a limited useful life, in which case it is depreciated in a manner that reflects the benefits to be derived from it.

Repairs and maintenance are taken to the profit or loss when these are incurred. The cost of major renovation and restoration is capitalized to the carrying amount of the related premises and equipment when it is probable that future economic benefits in excess of the originally assessed standard of performance of the existing asset and is depreciated over the remaining useful life of the related asset.

Constructions in-progress are stated at cost, including capitalized borrowing costs and other charges incurred in connection with the financing of the fixed asset constructions. The accumulated costs will be reclassified to the appropriate "Premises and Equipments" account when the construction is completed and the assets are ready for their intended use. Assets under construction are not depreciated as these are not yet available for use.

The legal cost of land rights in the form of Business Usage Rights (Hak Guna Usaha or HGU), Building Usage Right (Hak Guna Bangunan or HGB) and Usage Rights (Hak Pakai or HP) when the land was initially acquired are recognized as part of the cost of the land under the "Premises and Equipments". The extension or the legal renewal costs of land rights were recognized as intangible assets and were amortized over the shorter of the rights' legal life and land's economic life.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

m. Aset tetap, aset hak guna dan liabilitas sewa serta aset tidak berwujud (lanjutan)

Aset hak guna dan liabilitas sewa

Suatu sewa diklasifikasikan sebagai sewa pembiayaan jika sewa tersebut mengalihkan secara substansial seluruh risiko dan manfaat yang terkait dengan kepemilikan aset. Suatu sewa diklasifikasikan sebagai sewa operasi jika sewa tidak mengalihkan secara substansial seluruh risiko dan manfaat yang terkait dengan kepemilikan aset.

Sejak 1 Januari 2020, Bank menerapkan PSAK 73 tentang "Sewa" untuk seluruh sewa dengan mengakui aset hak guna dan liabilitas terkait, dengan 2 (dua) pengecualian yaitu aset pendasar bernilai rendah dan sewa jangka pendek.

Pada tanggal inisiasi suatu kontrak, Bank menilai apakah suatu kontrak merupakan, atau mengandung, sewa. Suatu kontrak merupakan, atau mengandung, sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan suatu aset selama suatu jangka waktu tertentu untuk dipertukarkan dengan imbalan. Untuk menilai apakah suatu kontrak memberikan hak untuk mengendalikan suatu aset identifikasi, Bank menilai apakah:

- Kontrak melibatkan penggunaan suatu aset identifikasi.
- Bank memiliki hak untuk memperoleh secara substansial seluruh manfaat ekonomi dari penggunaan aset selama periode penggunaan; dan
- Bank memiliki hak untuk mengendalikan aset identifikasi dalam bentuk:
 - a. Bank memiliki hak untuk mengoperasikan aset.
 - b. Bank mempunyai hak untuk menetapkan tujuan apa aset akan digunakan.

Pada tanggal inisiasi atau pada saat penilaian kembali suatu kontrak yang mengandung suatu komponen sewa, Bank mengalokasikan imbalan dalam kontrak ke masing-masing komponen sewa berdasarkan harga tersendiri relatif dari komponen sewa.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

m. Premises and equipments, right-of-use assets and lease liabilities and intangible assets (continued)

Right-of-use assets and lease liabilities

A lease is classified as a finance lease if it transfers substantially all the risks and rewards incidental to the ownership of the asset. A lease is classified as an operating lease if it does not transfer substantially all the risks and rewards incidental to the ownership of the asset.

Starting January 1, 2020, the Bank has applied SFAS 73 on "Leases" for all leases by recognizing right-of-use assets and related liabilities, with 2 (two) exceptions, namely low value underlying assets and short-term leases.

At the inception date of a contract, the Bank assesses whether a contract constitutes, or contains, a lease. A contract is, or contains, a lease if it conveys the right to control the use of an asset for a specified period of time in exchange for a fee. To assess whether a contract provides the right to control an identifying asset, the Bank assesses whether:

- Contracts involve the use of an identifying asset.
- The Bank has the right to obtain substantially all economic benefits from the use of assets during the period of use; and
- The Bank has the right to control identification assets in the form of:
 - a. The bank has the right to operate the assets.
 - b. The bank has the right to determine the purpose for which the assets will be used.

At the inception date or at the time of revaluation of a contract containing a lease component, the Bank allocates the fee in the contract to each component of the lease based on the relative separate prices of the lease component.

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m. Aset tetap, aset hak guna dan liabilitas sewa serta aset tidak berwujud (lanjutan)

Aset hak guna dan liabilitas sewa (lanjutan)

Pembayaran sewa yang termasuk dalam pengukuran liabilitas sewa meliputi:

- Pembayaran lunas dimuka.
- Pembayaran angsuran tetap.
- Pembayaran angsuran sewa berubah yang bergantung pada fluktuasi pembayaran sewa yang ditetapkan oleh *counter part*.

Bank mengakui aset hak-guna dan liabilitas sewa pada tanggal dimulainya sewa. Aset hak-guna awalnya diukur pada biaya perolehan, yang terdiri dari jumlah pengukuran awal dari liabilitas sewa disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan.

Setelah tanggal permulaan, aset hak-guna diukur dengan model biaya. Aset hak-guna diukur sebesar harga perolehan dikurangi akumulasi depresiasi dan akumulasi penurunan nilai serta disesuaikan dengan pengukuran kembali liabilitas sewa. Liabilitas sewa diukur pada biaya perolehan diamortisasi menggunakan metode suku bunga efektif. Bunga inkremental sewa mengacu pada tingkat suku bunga obligasi pemerintah.

Sewa jangka pendek dengan durasi kurang dari 12 (dua belas) bulan dan sewa aset bernilai rendah, serta elemen-elemen sewa tersebut, sebagian atau seluruhnya tidak menerapkan prinsip-prinsip pengakuan yang ditentukan oleh PSAK 73 dan akan diperlakukan sama dengan sewa operasi pada PSAK 30. Bank akan mengakui pembayaran sewa tersebut dengan dasar garis lurus selama masa sewa dalam laporan laba rugi dan penghasilan komprehensif lain. Beban ini disajikan pada beban umum dan administrasi dalam laporan laba rugi.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

m. Premises and equipments, right-of-use assets and lease liabilities and intangible assets (continued)

Right-of-use assets and lease liabilities (continued)

Lease payments that are included in the measurement of lease obligations consist of:

- Payment in full in advance.
- Fixed installment payments.
- The rental installment payment changes that depends on the fluctuation of the rental payment determined by the counter part.

The Bank recognizes right-of-use assets and lease liabilities on the inception date of the lease. Right-of-use assets are initially measured at cost, which consists of the initial measurement amount of the lease obligations adjusted with the lease payments made on or before the inception date, plus the initial direct costs incurred.

After the inception date, the right-of-use assets are measured using the cost model. Right-of-use assets are measured at cost less accumulated depreciation and accumulated impairment losses and adjusted with remeasurement of lease liabilities. Lease liabilities are measured at amortized cost using the effective interest method. Lease incremental interest rate refers to the interest rates on government bonds.

Short-term leases with a duration less than 12 (twelve) months and leases with low value assets, as well as elements of such leases, partially or entirely do not apply the recognition principles stipulated by SFAS 73 and will be treated the same as operating leases in SFAS 30. The Bank will recognize lease payments on a straight-line basis over the lease term in the statement of profit or loss and other comprehensive income. These expenses are presented under general and administrative expenses in the income statement.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

m. Aset tetap, aset hak guna dan liabilitas sewa serta aset tidak berwujud (lanjutan)

Aset tak berwujud

Aset tak berwujud terdiri dari perangkat lunak yang dibeli Bank, yang bukan merupakan bagian integral dari perangkat keras yang terkait.

Aset tidak berwujud diakui jika, atau hanya jika, biaya perolehan aset tersebut dapat diukur secara andal dan kemungkinan besar Bank akan memperoleh manfaat ekonomis masa depan dari aset tersebut.

Aset tak berwujud dicatat sebesar biaya perolehan dikurangi akumulasi amortisasi dan akumulasi kerugian penurunan nilai.

Amortisasi diakui dalam laba rugi dengan menggunakan metode garis lurus berdasarkan taksiran masa manfaat ekonomis selama 5 (lima) tahun, dimulai dari pada saat aset tak berwujud tersebut siap untuk digunakan sesuai dengan maksud penggunaannya.

Nilai residu, umur manfaat dan metode amortisasi ditelaah setiap akhir tahun dan disesuaikan jika diperlukan.

Aset tidak berwujud dihentikan pengakuannya jika dilepas atau ketika tidak terdapat lagi manfaat ekonomi masa depan yang diharapkan dari penggunaan atau pelepasannya. Keuntungan atau kerugian yang muncul dari penghentian pengakuan aset tak berwujud ditentukan sebagai selisih antara hasil neto pelepasan, jika ada, dan jumlah tercatat aset. Keuntungan atau kerugian diakui dalam laba rugi ketika aset tersebut dihentikan penggunaannya.

n. Penurunan nilai aset non-keuangan

Pada setiap akhir periode pelaporan, Bank menilai apakah terdapat indikasi suatu aset mengalami penurunan nilai. Jika terdapat indikasi tersebut atau pada saat pengujian tahunan atas penurunan nilai aset tertentu diperlukan, maka Bank akan membuat estimasi atas jumlah terpulihkan aset tersebut.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

m. Premises and equipments, right-of-use assets and lease liabilities and intangible assets (continued)

Intangible assets

Intangible assets consist of software purchased by the Bank that is not an integral part of a related hardware.

Intangible assets are recognized if, and only if, 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.

Intangible assets are stated at cost less accumulated amortization and accumulated impairment losses.

Amortization are recognized in profit or loss using the straight line method based on the estimated useful life of 5 (five) years, starting when the intangible assets are ready to be used in accordance with the intended use.

The residual value, useful life and amortization method are reviewed at the end of each year and adjusted, if necessary.

An intangible asset shall be derecognized on disposal or when no future economic benefits are expected from its use or disposal. The gain or loss arising from the derecognition of an intangible asset shall be determined as the difference between the net disposal proceeds, if any, and the carrying amount of the asset. Gains and losses shall be recognized in profit or loss when asset is derecognized.

n. Impairment of non-financial assets

The Bank assesses at each annual reporting period whether there is an indication that an asset may be impaired. If such indication exists, or when annual impairment testing for an asset is required, Bank will make an estimation of the asset's recoverable amount.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

n. Penurunan nilai aset non-keuangan (lanjutan)

Jumlah terpulihkan yang ditentukan untuk aset individual adalah jumlah yang lebih tinggi antara nilai wajar aset atau Unit Penghasil Kas (UPK) dikurangi biaya pelepasan dengan nilai pakainya, kecuali aset tersebut tidak menghasilkan arus kas masuk yang sebagian besar independen dari aset atau kelompok aset lain. Jika nilai tercatat aset lebih besar daripada nilai terpulihkannya, maka aset tersebut dianggap mengalami penurunan nilai dan nilai tercatat aset diturunkan menjadi sebesar nilai terpulihkannya.

Rugi penurunan nilai dari operasi yang berkelanjutan diakui pada laporan laba rugi dan penghasilan komprehensif lain sebagai "rugi penurunan nilai". Dalam menghitung nilai pakai, estimasi arus kas masa depan neto didiskontokan ke nilai kini dengan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar kini atas nilai waktu uang dan risiko spesifik aset.

Dalam menentukan nilai wajar dikurangi biaya pelepasan, mengacu pada PSAK 68 tentang "Pengukuran Nilai Wajar" (Catatan 2b).

Kerugian penurunan nilai dari operasi yang berkelanjutan, jika ada, diakui pada laporan laba rugi dan penghasilan komprehensif lain sesuai dengan kategori biaya yang konsisten dengan fungsi aset yang diturunkan nilainya.

o. Agunan yang diambil alih

Agunan yang diambil alih sehubungan dengan penyelesaian kredit diakui sebesar nilai neto yang dapat direalisasi atau sebesar nilai tercatat dari kredit, mana yang lebih rendah. Nilai neto yang dapat direalisasi adalah nilai wajar agunan setelah dikurangi estimasi biaya pelepasan. Kelebihan saldo kredit yang diberikan, yang belum dilunasi oleh peminjam diatas nilai dari agunan yang diambil alih, dibebankan sebagai penyisihan penghapusan aset pada tahun berjalan. Selisih antara nilai agunan yang diambil alih dengan hasil penjualannya diakui sebagai keuntungan atau kerugian pada saat penjualan agunan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

n. Impairment of non-financial assets (continued)

An asset's recoverable amount for individual asset is the higher of an asset's fair value or Cash Generating Unit (CGU) less costs of disposal and its value in use, unless the asset does not generate cash inflows that are largely independent from other assets or groups of assets. Where the carrying amount of an asset exceeds its recoverable amount, the asset is considered impaired and is recorded to its recoverable amount.

Impairment losses of continuing operations are recognized in the statement of profit or loss and other comprehensive income as "impairment losses". In assessing the value in use, the estimated net future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

In determining fair value less costs of disposal, refer to SFAS 68 on "Fair Value Measurements" (Note 2b).

Impairment losses of continuing operations, if any, are recognized in the statement of profit or loss and other comprehensive income under expense categories that are consistent with the functions of the impaired assets.

o. Foreclosed collaterals

Foreclosed collaterals acquired in settlement of loans are recognized at their net realizable values or stated at their carrying amount of loans, whichever is lower. Net realizable value is the fair value of the collateral after deducting the estimated costs of disposal. The excess of loan balances which has not been paid by debtors over the value of foreclosed collaterals is charged to allowance for possible losses on loans in the current year. The difference between the value of the foreclosed collateral and the proceeds from the sale is recognized as a gain or loss at the time of sale of the collateral.

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o. Agunan yang diambil alih (lanjutan)

Bank mengevaluasi nilai agunan yang diambil alih secara berkala. Penyisihan kerugian agunan yang diambil alih dibentuk berdasarkan penurunan nilai agunan yang diambil alih.

Beban perbaikan (reconditioning cost) yang timbul setelah pengambilalihan agunan dikapitalisasi dalam akun agunan yang diambil alih tersebut.

p. Biaya dibayar dimuka

Biaya dibayar dimuka diamortisasi selama masa manfaat dengan menggunakan metode garis lurus (straight-line method).

q. Liabilitas segera

Liabilitas segera merupakan liabilitas Bank kepada pihak lain yang sifatnya wajib segera dibayarkan sesuai dengan perintah pemberi amanat perjanjian yang ditetapkan sebelumnya.

Liabilitas segera diklasifikasikan sebagai liabilitas keuangan dan dihitung berdasarkan biaya perolehan diamortisasi.

r. Simpanan nasabah dan bank lain

Giro merupakan simpanan nasabah yang penarikannya dapat dilakukan setiap saat menggunakan cek, atau dengan cara pemindahbukuan dengan bilyet giro atau sarana perintah pembayaran lainnya. Giro dinyatakan sebesar nilai liabilitas kepada pemegang giro.

Tabungan merupakan simpanan nasabah yang penarikannya hanya dapat dilakukan menurut syarat tertentu yang disepakati. Tabungan dinyatakan sebesar nilai liabilitas kepada pemilik tabungan.

Deposito berjangka merupakan simpanan nasabah yang penarikannya hanya dapat dilakukan pada waktu tertentu sesuai perjanjian antara penyimpan dengan Bank. Deposito berjangka dinyatakan sebesar nilai nominal yang tercantum dalam bilyet deposito atau yang diperjanjikan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

o. Foreclosed collaterals (continued)

The Bank regularly evaluates the value of foreclosed collaterals. The allowance are provided based on the impairment of foreclosed collaterals.

Reconditioning costs that occur after collateral foreclosed are capitalized to its account.

p. Prepaid expenses

Prepaid expenses are amortized over their useful lives using the straight-line method.

q. Liabilities due immediately

Liabilities due immediately represent the liability of the Bank to external parties which by nature should be paid immediately in accordance with the requirements in the agreement which have been previously determined.

Liabilities due immediately are classified as financial liabilities and are recorded at amortized cost.

r. Deposits from customers and other banks

Demand deposits represent funds deposited by customers which can be withdrawn any time by using a cheque, or through transfer with a bank draft or other forms of payment order. These demand deposits are stated at the amount due to the account holder.

Saving deposits represent customers' funds which the depositors are entitled to withdraw under certain agreed conditions. Saving deposits are stated at the amount due to the account holders.

Time deposits represent funds deposited by customers that can be withdrawn only at a certain point of time as stated in the contract between the depositor and the Bank. Time deposits are recorded at the nominal amount stated in the deposit certificate or at the amount stated in the agreement.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

r. Simpanan nasabah dan bank lain (lanjutan)

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain, baik lokal maupun luar negeri, dalam bentuk giro, deposito berjangka dan *inter-bank call money* serta dinyatakan sesuai dengan jumlah liabilitas terhadap bank tersebut.

Simpanan nasabah dan bank lain diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi menggunakan metode suku bunga efektif. Biaya tambahan yang dapat diatribusikan secara langsung dengan perolehan simpanan nasabah dikurangkan dari jumlah simpanan yang diterima.

s. Surat berharga yang diterbitkan

Surat berharga yang diterbitkan Bank adalah Obligasi.

Surat berharga yang diterbitkan pada awalnya diakui sebesar nilai wajar dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif (EIR). Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal dan biaya transaksi yang tidak terpisah dari suku bunga efektif.

t. Pinjaman yang diterima

Pinjaman yang diterima merupakan dana yang diterima dari pihak lain dengan liabilitas pembayaran kembali sesuai dengan persyaratan perjanjian pinjaman.

Pinjaman yang diterima diakui sebesar nilai wajar pada awalnya dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif (EIR). Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal dan biaya transaksi yang tidak terpisah dari suku bunga efektif.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

r. Deposits from customers and other banks (continued)

Deposits from other banks consist of liabilities to other banks, either domestic or overseas, in the form of demand deposits, time deposits and inter-bank call money and stated at the amount due to banks.

Deposits from customers and other banks are classified as financial liabilities measured at amortized cost using effective interest rate method. Incremental costs directly attributable to the acquisition of deposits from customers are deducted from the amount of deposits.

s. Marketable securities issued

Marketable securities issued by Bank consist of Bonds.

The marketable securities issued are recognized initially at fair value and subsequently measured at amortized cost using the effective interest rate method (EIR). Amortized cost is calculated by taking into account any discount or premium related to the initial recognition and transaction costs that are an integral part of the effective interest rate.

t. Fund borrowings

Fund borrowings represent funds received from other parties with a repayment obligation in accordance with the terms of the borrowing agreement.

Fund borrowings are initially recognized at fair value and subsequently measured at amortized cost using the effective interest rate (EIR) method. Amortized cost is calculated by taking into account any discount or premium associated with initial recognition and transaction costs that are not separate from the effective interest rate.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

u. Provisi

Provisi diakui jika Bank memiliki kewajiban kini (baik bersifat hukum maupun bersifat konstruktif) yang diakibatkan peristiwa masa lalu, besar kemungkinannya penyelesaian kewajiban tersebut mengakibatkan arus keluar sumber daya yang mengandung manfaat ekonomi dan estimasi yang andal mengenai jumlah kewajiban tersebut dapat dibuat.

Provisi ditelaah pada setiap tanggal pelaporan dan disesuaikan untuk mencerminkan estimasi terbaik yang paling kini. Jika arus keluar sumber daya untuk menyelesaikan kewajiban kemungkinan besar tidak terjadi, maka provisi dibalik.

v. Pendapatan dan beban bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan yang dikenakan suku bunga diakui pada laporan laba rugi dan penghasilan komprehensif lain dengan menggunakan metode suku bunga efektif.

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau, jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat neto dari aset keuangan atau liabilitas keuangan.

Pada saat menghitung suku bunga efektif, Bank mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, tetapi tidak mempertimbangkan kerugian kredit di masa mendatang.

Perhitungan ini mencakup seluruh komisi, provisi dan bentuk lain diterima oleh para pihak dalam kontrak yang merupakan bagian tidak terpisahkan dari suku bunga efektif, biaya transaksi dan seluruh premi atau diskon lainnya.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

u. Provisions

Provisions are recognized when the Bank has a present obligation (legal or constructive) where, as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation.

Provisions are reviewed at each reporting date and adjusted to reflect the current best estimate. If it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed.

v. Interest income and expense

Interest income and expense for all interest-bearing financial instruments are recognized in the statement of profit or loss and other comprehensive income using the effective interest rate method.

The effective interest rate is the rate that precisely discounts the estimated future cash payments or receipts over the expected life of the financial assets and financial liabilities (or, wherever appropriate, a shorter period) to the net carrying amount of the financial assets or financial liabilities.

When calculating the effective interest rate, the Bank estimates future cash flows considering all contractual terms of the financial instrument but not future credit losses.

This calculation includes all commissions, fees and other forms received by the parties in the contract that are an integral part of the effective interest rate, transaction costs and all other premiums or discounts.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

v. Pendapatan dan beban bunga (lanjutan)

Jika aset keuangan atau kelompok aset keuangan serupa telah diturunkan nilainya sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui berdasarkan suku bunga efektif yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

w. Pendapatan provisi dan komisi

Pendapatan provisi dan komisi yang berkaitan langsung dengan kegiatan pemberian kredit, atau pendapatan provisi dan komisi yang berhubungan dengan jangka waktu tertentu, diamortisasi sesuai dengan jangka waktu kontrak menggunakan metode suku bunga efektif dan diklasifikasikan sebagai bagian dari pendapatan bunga pada laporan laba rugi dan penghasilan komprehensif lain.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian kredit atau suatu jangka waktu dan/atau terkait dengan pemberian suatu jasa, diakui sebagai pendapatan pada saat terjadinya transaksi dan dicatat pada akun pendapatan operasional lainnya.

x. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek seperti upah, iuran jaminan sosial, cuti jangka pendek, bonus dan imbalan non moneter lainnya diakui selama periode jasa diberikan. Imbalan jangka pendek dihitung sebesar jumlah yang tidak didiskontokan.

Program pensiun iuran pasti

Merupakan iuran kepada dana pensiun sebesar persentase tertentu gaji pegawai yang menjadi peserta program pensiun iuran pasti Bank. Iuran dicadangkan dan diakui sebagai biaya ketika jasa telah diberikan oleh pegawai-pegawai tersebut dan pembayaran dikurangkan dari utang iuran. Iuran terutang dihitung berdasarkan jumlah yang tidak didiskontokan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

v. Interest income and expense (continued)

If a financial asset or group of similar financial assets has decreased its value as a result of impairment losses, interest income subsequently obtained is recognized based on the effective interest rate used to discount future cash flows in calculating impairment losses.

w. Fees and commissions

Fees and commissions directly related to lending activities, or fees and commissions income which relates to a specific period, are amortized over the term of the contract using the effective interest rate method and classified as part of interest income in the statement of profit or loss and other comprehensive income.

Fees and commissions which are not directly related to lending activities, or to a specific period, and/or related to a service rendered, are recognized as income at the time of the transactions and recorded in other operating income.

x. Employee benefits

Short-term employee benefits

Short-term employee benefits such as salaries, social security contributions, short-term leaves, bonuses and other non-monetary benefits are recognized during the period when services have been rendered. Short-term employee benefits are measured using undiscounted amounts.

Defined contribution plan

Contribution payable to the pension fund equivalent to a certain percentage of salaries for qualified employees under the Bank's defined contribution plan. The contribution is accrued and recognized as expense when services have been rendered by qualified employees and actual payments are deducted from the contribution payable. Contribution payable is measured using undiscounted amounts.

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x. Imbalan kerja (lanjutan)

Program imbalan pasti dan imbalan kerja jangka panjang lainnya

Imbalan pasca-kerja dan imbalan kerja jangka panjang lainnya seperti cuti besar dan penghargaan masa kerja dicadangkan dan diakui sebagai biaya ketika jasa telah diberikan oleh pegawai yang memenuhi syarat. Imbalan kerja ditentukan berdasarkan peraturan Bank dan peraturan yang berlaku.

Imbalan pasca-kerja dan imbalan kerja jangka panjang lainnya secara aktuaris ditentukan berdasarkan metode *Projected Unit Credit*.

Pengukuran kembali atas liabilitas (aset) imbalan pasti neto, yang diakui sebagai penghasilan komprehensif lain, terdiri atas:

- (i) Keuntungan dan kerugian aktuarial.
- (ii) Imbal hasil atas aset program, tidak termasuk jumlah yang dimasukkan dalam bunga neto atas liabilitas (aset).
- (iii) Setiap perubahan dampak batas aset, tidak termasuk jumlah yang dimasukkan dalam bunga neto atas liabilitas (aset).

Pengukuran kembali atas liabilitas (aset) imbalan pasti neto, yang diakui sebagai penghasilan komprehensif lain tidak direklasifikasi ke laba rugi pada periode berikutnya.

Untuk imbalan kerja jangka panjang lain atas biaya jasa kini, biaya bunga neto atas liabilitas (aset) imbalan pasti neto, dan pengukuran kembali liabilitas (aset) imbalan pasti neto langsung diakui pada laporan laba rugi dan penghasilan komprehensif lain periode berjalan.

Biaya jasa lalu diakui sebagai beban pada tanggal yang lebih awal antara ketika amandemen atau kurtailmen program terjadi, dan ketika biaya restrukturisasi atau pesangon diakui, sehingga biaya jasa lalu yang belum vested tidak lagi dapat ditangguhkan dan diakui selama periode *vesting* masa depan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

x. Employee benefits (continued)

Defined benefit plan and other long-term employee benefits

The post-employment benefits and other long-term employee benefits such as grand leaves and gratuity for services are accrued and recognized as expense when services have been rendered by qualified employees. The benefits are determined based on Bank's regulations and applicable regulations.

The post-employment benefits and other long-term employee benefits are actuarially determined using the *Projected Unit Credit Method*.

Remeasurement of net defined benefit liabilities (assets), which is recognized as other comprehensive income, consist of:

- (i) Actuarial gains and losses.
- (ii) Return on plan assets, excluding amounts that included in net interest on liabilities (assets).
- (iii) The changes in the impact of the asset ceiling, excluding amounts that included in net interest on liabilities (assets).

Remeasurement of net defined benefit liabilities (assets), which is recognized as other comprehensive income are not reclassified to profit or loss in subsequent periods.

For other long-term employee benefits over the current service cost, net interest on net defined benefit liabilities (assets), and the remeasurement of net defined benefit liability (asset) obligations are recognized immediately in the current period statement of profit or loss and other comprehensive income.

All past service costs are recognised at the earlier of when the amendment or curtailment occurs, and when the related restructuring or termination costs are recognized, as a result, unvested past service cost can no longer be deferred and recognised over the future vesting period.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

y. Laba per lembar saham

Laba per lembar saham dasar dihitung dengan membagi laba tahun berjalan dengan jumlah rata-rata tertimbang saham yang ditempatkan dan disetor penuh pada tahun yang bersangkutan.

Laba per lembar saham dilusian dihitung setelah melakukan penyesuaian yang diperlukan terhadap jumlah rata-rata tertimbang saham biasa yang beredar.

z. Transaksi dan saldo dalam mata uang asing

Bank menyelenggarakan catatan akuntansinya dalam Rupiah. Transaksi yang melibatkan mata uang asing dicatat pada nilai tukar pada saat terjadinya transaksi. Pada tanggal laporan posisi keuangan, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke dalam mata uang Rupiah dengan menggunakan kurs *spot Reuters* pada pukul 16:00 WIB (Waktu Indonesia Bagian Barat).

Keuntungan atau kerugian yang timbul sebagai akibat dari penjabaran aset dan liabilitas moneter dalam mata uang asing dicatat dalam laporan laba rugi dan penghasilan komprehensif lain tahun berjalan.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, kurs mata uang asing yang digunakan untuk penjabaran mata uang asing terhadap Rupiah adalah sebagai berikut (Rupiah penuh):

	31 Desember/ December 31, 2021
1 Dolar Amerika Serikat	14.252,50

aa. Perpajakan

Beban pajak tahun berjalan ditetapkan berdasarkan taksiran penghasilan kena pajak tahun berjalan. Aset dan liabilitas pajak tangguhan diakui atas perbedaan temporer aset dan liabilitas antara pelaporan komersial dan pajak pada setiap tanggal pelaporan.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

y. Earnings per share

Basic earnings per share is calculated by dividing income for the year by the weighted average number of issued and fully paid shares during the related year.

Diluted earnings per share is computed after making the necessary adjustments to the weighted average number of common shares outstanding.

z. Foreign currency transactions and balances

The Bank maintains its accounting records in Indonesian Rupiah. Transactions in foreign currencies are recorded at the prevailing exchange rates in effect on the date of the transactions. At statements of financial position dates, all monetary assets and liabilities denominated in foreign currencies are translated into Rupiah using the Reuters spot rates at 16:00 WIB (Western Indonesian Time).

The resulting gains or losses from the translation of monetary assets and liabilities in foreign currencies are recognized in the statement of profit or loss and other comprehensive income for the current year.

As of December 31, 2021 and 2020, the exchange rates used in translating foreign currency amounts into Rupiah are as follows (full Rupiah):

	31 Desember/ December 31, 2020	
1.050,00		1 United States Dollar

aa. Taxation

Current tax expense is provided based on the estimated taxable income for the current year. Deferred tax assets and liabilities are recognized for temporary differences between the financial and the tax bases of assets and liabilities at each reporting date.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

aa. Perpajakan (lanjutan)

Aset pajak tangguhan diakui untuk seluruh perbedaan temporer yang boleh dikurangkan dan saldo rugi fiskal yang belum dikompensasikan, sepanjang perbedaan temporer dan rugi fiskal yang belum dikompensasikan tersebut dapat dimanfaatkan untuk mengurangi laba fiskal pada masa yang akan datang.

Jumlah tercatat aset pajak tangguhan ditelaah pada setiap tanggal posisi laporan keuangan dan nilai tercatat aset pajak tangguhan tersebut diturunkan apabila tidak lagi terdapat kemungkinan besar bahwa laba fiskal yang memadai akan tersedia untuk mengkompensasi sebagian atau semua manfaat aset pajak tangguhan.

Aset dan kewajiban pajak tangguhan diukur berdasarkan tarif pajak yang akan berlaku pada tahun saat aset direalisasikan atau liabilitas diselesaikan berdasarkan peraturan perpajakan yang berlaku atau yang secara substantif telah diberlakukan pada tanggal laporan posisi keuangan.

Pengaruh pajak terkait dengan penyisihan untuk dan/atau pembalikan seluruh perbedaan temporer selama tahun berjalan, termasuk pengaruh perubahan tarif pajak, diakui sebagai "Manfaat (Beban) Pajak Penghasilan, Tangguhan" dan termasuk dalam laba atau rugi neto tahun berjalan, kecuali untuk transaksi-transaksi yang sebelumnya telah langsung dibebankan atau dikreditkan ke ekuitas.

Perubahan terhadap kewajiban perpajakan diakui pada saat penetapan pajak diterima atau jika Bank mengajukan keberatan, pada saat keputusan atas keberatan telah ditetapkan.

Aset dan liabilitas atas pajak tangguhan dan pajak kini dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

aa. Taxation (continued)

Deferred tax assets are recognized for all deductible temporary differences and carry forward of uncompensated tax losses to the extent that it is probable for temporary differences and carry forward of uncompensated tax losses to be utilized in deducting future taxable profit.

The carrying amount of deferred tax assets is reviewed at each reporting date and is reduced when it is no longer probable that sufficient taxable profits will be available to compensate part or all of the benefit of the deferred tax assets.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply on the year when the asset is realized or the liability is settled based on tax laws that have been enacted or substantively enacted as at statement of financial position reporting date.

The related tax effects of the provisions for and/or reversals of all temporary differences during the year, including the effect of change in tax rates, are recognized as "Income Tax Benefit (Expense), Deferred" and included in net profit or loss for the year, except to the extent that they relate to items previously charged or credited to equity.

Amendments to tax obligations are recorded when an assessment is received or, if appealed against by the Bank, when the result of the appeal is determined.

Assets and liabilities of deferred and current tax are offset when there is a legally enforceable right to offset.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

ab. Informasi segmen

Segmen adalah bagian yang dapat dibedakan dari Bank yang terlibat baik dalam menyediakan produk tertentu (segmen usaha), maupun dalam menyediakan produk dalam lingkungan ekonomi tertentu (segmen geografis), yang memiliki risiko dan imbalan yang berbeda dengan segmen lainnya.

Pendapatan, beban, hasil, aset dan liabilitas segmen mencakup *item-item* yang dapat diatribusikan langsung kepada suatu segmen serta hal-hal yang dapat dialokasikan dengan dasar yang sesuai kepada segmen tersebut.

Bank menyajikan segmen operasi berdasarkan laporan internal yang disajikan kepada pengambil keputusan operasional dan keuangan yaitu Direksi.

Bank telah mengidentifikasi dan mengungkapkan informasi keuangan berdasarkan kegiatan bisnis utama (segmen bisnis) yang terbagi atas kelompok konsumen, ritel, menengah dan lainnya.

ac. Instrumen derivatif

Instrumen keuangan derivatif dinilai dan diakui di laporan posisi keuangan pada nilai wajar. Setiap kontrak derivatif dicatat sebagai aset apabila memiliki nilai wajar positif dan sebagai liabilitas apabila memiliki nilai wajar negatif.

Tagihan dan liabilitas derivatif diklasifikasikan sebagai aset dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi.

Keuntungan atau kerugian yang terjadi dari perubahan nilai wajar diakui dalam laporan laba rugi dan penghasilan komprehensif lain.

Nilai wajar instrumen derivatif ditentukan diskonto arus kas dan model penentu harga atau harga yang diberikan oleh broker (*quoted price*) atas instrumen lainnya yang memiliki karakteristik serupa, yang mengacu pada PSAK 68 tentang "Pengukuran Nilai Wajar" (Catatan 2b).

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

ab. Segment information

A segment is a distinguishable component of the business unit that is engaged either in providing certain products (business segment), or in providing products within a particular economic environment (geographical segment), which is subject to risks and rewards that are different from those of other segments.

Segment revenue, expenses, results, 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. The Bank presents operating segment

based on Bank's internal report that is presented to the Board of Directors as the operational and financial decision maker.

The Bank has identified and disclosed financial information based on main business (business segment) classified into consumer, retail, middle and others.

ac. Derivative Instruments

Derivatives financial instruments are assessed and recognized in the statement of financial position at fair value. Each derivatives contract is recorded as asset when the fair value is positive and as liability when the fair value is negative.

Derivatives receivable and payable are classified as financial assets and liabilities measured at fair value through profit or loss.

Gains or losses resulting from fair value changes are recognized in the statement of profit or loss and other comprehensive income.

The fair value of derivatives instruments are determined based on discounted cash flows and pricing models or quoted prices from the brokers of other instruments with similar characteristics, which refers to SFAS 68 on "Fair Value Measurement" (Note 2b).

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ac. Instrumen derivatif (lanjutan)

Derivatif melekat tidak lagi dipisahkan dari kontrak utama non-derivatif yang merupakan aset keuangan/liabilitas keuangan, Bank mengklasifikasikan aset/liabilitas keuangan secara keseluruhan berdasarkan model bisnis dan jangka waktu kontraktualnya sebagaimana diungkapkan dalam Catatan 2b.

ad. Opsi saham

Bank memberikan opsi saham kepada manajemen dan karyawan berdasarkan persyaratan yang telah ditetapkan. Jumlah biaya kompensasi saham dihitung pada tanggal diberikannya opsi saham (*grant date*) dengan menggunakan nilai wajar opsi saham tersebut dan diakui pada akun "Beban Gaji dan Tunjangan" berdasarkan program hak yang diakui selama tahun berjalan dengan metode garis lurus selama periode *vesting*. Akumulasi dari biaya kompensasi saham diakui sebagai "Opsi Saham" dalam bagian ekuitas.

Nilai wajar dari opsi saham tersebut dinilai dengan menggunakan model penentuan harga opsi *Black-Scholes*.

ae. Cadangan kerugian penurunan nilai aset non produktif

Bank menentukan cadangan kerugian penurunan nilai atas aset non produktif pada nilai yang lebih rendah antara nilai tercatat dan nilai wajar setelah dikurangi biaya pelepasan.

af. Penggunaan 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 dalam periode pelaporan berikutnya.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

ac. Derivative Instruments (continued)

Embedded derivatives are no longer separated from the main non-derivative contracts which are financial assets/financial liabilities, the Bank classifies financial assets/ liabilities as a whole based on the business model and the contractual term as disclosed in Note 2b

ad. Share options

The Bank has granted share options to the Management and employees based on established criteria. Compensation cost at the grant date is calculated using the fair value of such stock options and is recognized as part of "Salaries and Allowances" based on cliff-vesting scheme using the straight-line method over the vesting period. The accumulation of stock compensation cost is recognized as "Share Options" in equity.

The fair value of the stock options granted is calculated using the Black-Scholes option pricing model.

ae. Allowances for impairment losses on non-earning assets

The Bank's management determine the allowance for impairment losses on non-earning assets as the lower amount between the carrying amount and the fair value after deducting the cost of disposal.

af. Use of significant accounting judgments, 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 disclosure of contingent liabilities, at the end of the reporting period. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amounts of the asset and liability affected in future periods.

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af. Penggunaan pertimbangan, estimasi dan asumsi akuntansi yang signifikan (lanjutan)

Pertimbangan

Pertimbangan berikut ini dibuat oleh manajemen dalam rangka penerapan kebijakan akuntansi Bank yang memiliki pengaruh paling signifikan atas jumlah yang diakui dalam laporan keuangan Bank sebagai berikut:

Usaha yang berkelanjutan

Manajemen Bank telah melakukan penilaian atas kemampuan Bank untuk melanjutkan kelangsungan usahanya dan berkeyakinan bahwa Bank memiliki sumber daya untuk melanjutkan usahanya di masa mendatang. Selain itu, manajemen Bank tidak mengetahui adanya ketidakpastian material yang dapat menimbulkan keraguan yang signifikan terhadap kemampuan Bank untuk melanjutkan kelangsungan usahanya. Oleh karena itu, laporan keuangan telah disusun atas dasar usaha yang berkelanjutan.

Nilai wajar atas instrumen keuangan

Semua aset dan liabilitas dimana nilai wajar diukur atau diungkapkan dalam laporan keuangan dapat dikategorikan pada level hirarki nilai wajar, berdasarkan tingkatan input terendah yang signifikan atas pengukuran nilai wajar secara keseluruhan:

- Level 1: harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liabilitas yang identik yang dapat diakses pada tanggal pengukuran.
- Level 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung atau tidak langsung.
- Level 3: input yang tidak dapat diobservasi untuk aset dan liabilitas.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

af. Use of significant accounting judgments, estimates and assumptions (continued)

Judgments

The following judgments are made by management in the process of applying Bank's accounting policies that have the most significant effects on the amounts recognized in Bank's financial statements as follows:

Going concern

The Bank's management has assessed the ability of the Bank to continue as going concerns and believes that the Bank have the resources to continue their businesses in the future. Furthermore, the Bank's management is not aware of any material uncertainties that may cast significant doubt to the Bank's ability to continue as a going concern. Therefore, the financial statements have been prepared on going concern basis.

Fair value of financial instruments

All assets and liabilities in which fair value is measured or disclosed in the financial statements can be classified in fair value hierarchy levels, based on the lowest level of input that is significant on the overall fair value measurement:

- *Level 1: quoted (unadjusted) market prices in active markets for identical assets or liabilities accessible at the measurement date.*
- *Level 2: inputs other than quoted prices included in level 1 for the assets and liabilities, which is directly or indirectly observable.*
- *Level 3: unobservable inputs for the assets and liabilities.*

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af. Penggunaan pertimbangan, estimasi dan asumsi akuntansi yang signifikan (lanjutan)

Pertimbangan (lanjutan)

Pertimbangan berikut ini dibuat oleh manajemen dalam rangka penerapan kebijakan akuntansi Bank yang memiliki pengaruh paling signifikan atas jumlah yang diakui dalam laporan keuangan Bank sebagai berikut (lanjutan):

Kontinjensi

Bank sedang terlibat dalam proses hukum. Perkiraan biaya kemungkinan bagi penyelesaian klaim telah dikembangkan melalui konsultasi dengan bantuan konsultan hukum Bank didasarkan pada analisis hasil yang potensial.

Manajemen tidak berkeyakinan bahwa hasil dari hal ini akan mempengaruhi hasil usaha. Besar kemungkinan, bagaimanapun, bahwa hasil operasi di masa depan dapat secara material terpengaruh oleh perubahan dalam estimasi atau efektivitas dari strategi yang terkait dengan hal tersebut.

Estimasi dan Asumsi

Asumsi utama masa depan dan sumber utama estimasi ketidakpastian lain pada tanggal pelaporan yang memiliki risiko signifikan untuk dapat menyebabkan penyesuaian yang material terhadap nilai tercatat aset dan liabilitas untuk tahun berikutnya, diungkapkan di bawah ini. Bank mendasarkan asumsi dan estimasi yang digunakan pada parameter yang tersedia pada saat laporan keuangan disusun.

Asumsi dan situasi mengenai perkembangan masa depan dapat berubah akibat perubahan pasar atau situasi yang timbul di luar kendali Bank. Perubahan tersebut dicerminkan dalam asumsi yang digunakan pada saat terjadinya.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

af. Use of significant accounting judgments, estimates and assumptions (continued)

Judgments (continued)

The following judgments are made by management in the process of applying Bank's accounting policies that have the most significant effects on the amounts recognized in Bank's financial statements as follows (continued):

Contingencies

The Bank is currently involved in legal proceedings. The estimate of the probable cost for the resolution of claims has been developed in consultation with the aid of the external legal counsel handling the Bank's defense in this matter and is based upon an analysis of potential results.

Management does not believe that the outcome of this matter will affect the results of operations. It is probable, however, that future results of operations could be materially affected by changes in the estimates or in the effectiveness of the strategies relating to these proceedings.

Estimates and Assumptions

The key assumptions concerning the future and other key sources of estimating uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are disclosed below. The Bank based its assumptions and estimates on parameters available when the 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.

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af. Penggunaan pertimbangan, estimasi dan asumsi akuntansi yang signifikan (lanjutan)

Estimasi dan Asumsi (lanjutan)

Cadangan kerugian penurunan nilai kredit yang diberikan

Manajemen Bank menelaah portofolio kredit yang diberikan setiap tahun untuk menilai penurunan nilai dengan memperbaharui cadangan kerugian penurunan nilai yang dibentuk selama periode yang diperlukan berdasarkan analisis berkelanjutan dan pemantauan terhadap rekening individual oleh petugas kredit.

Dalam menentukan apakah penurunan nilai harus dibentuk dalam laporan laba rugi dan penghasilan komprehensif lain, Bank membuat penilaian, apakah terdapat data yang dapat diobservasi yang menunjukkan bahwa terdapat penurunan yang dapat diukur dalam laporan perkiraan arus kas masa depan dari portofolio pinjaman sebelum penurunan tersebut dapat diidentifikasi secara individual dalam portofolio tersebut.

Bukti seperti ini dapat termasuk data yang dapat diobservasi yang menunjukkan bahwa telah terjadi perubahan yang merugikan pada status pembayaran kelompok peminjam, atau kondisi ekonomi nasional atau lokal yang berkorelasi dengan wanprestasi atas aset dalam kelompok. Bank menggunakan perkiraan dalam menentukan jumlah dan waktu dari arus kas masa depan ketika menentukan tingkat cadangan kerugian yang diperlukan. Estimasi tersebut didasarkan pada asumsi mengenai sejumlah faktor dan hasil aktual yang dapat berbeda, yang mengakibatkan perubahan terhadap jumlah cadangan kerugian di masa yang akan datang (Catatan 11).

Penurunan nilai untuk surat berharga

Manajemen Bank menentukan bahwa surat berharga memiliki kriteria penurunan nilai yang sama dengan aset keuangan yang dicatat pada biaya perolehan diamortisasi (Catatan 7).

2. SUMMARY OF ACCOUNTING POLICIES (continued)

af. Use of significant accounting judgments, estimates and assumptions (continued)

Estimates and Assumptions (continued)

Allowance for impairment losses on loans

The Bank's management reviews its loan portfolio to assess impairment on an annual basis with updating allowance for impairment losses made during the intervals as necessary based on the continuing analysis and monitoring of individual accounts by credit officers.

In determining whether an impairment loss should be recorded in the statement of profit or loss and other comprehensive income, the Bank assesses for any observable data indicating the existence of measurable decrease in the estimated future cash flows from loan portfolio before the decrease is individually identified in the portfolio.

This evidence may include observable data indicating that there has been an adverse change in the payment status of group borrowers, or national or local economic conditions that correlate with breach on assets in group. The Bank uses estimates in determining the amount and timing of future cash flows when determining the level of allowance for losses required. Such estimates are based on assumptions of several factors and actual results may differ, resulting to future changes in the amount of allowance for losses (Note 11).

Impairment of securities

The Bank's management determines that securities are impaired based on the same criteria as financial assets carried at amortized cost (Note 7).

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**af. Penggunaan pertimbangan, estimasi dan
asumsi akuntansi yang signifikan (lanjutan)**

Estimasi dan Asumsi (lanjutan)

Penurunan nilai aset non-keuangan

Manajemen Bank mengevaluasi penurunan nilai aset non-keuangan apabila terdapat kejadian atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat aset non-keuangan 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 pelepasan dengan nilai pakai aset (atau unit penghasil kas). Jumlah terpulihkan diestimasi untuk aset individual atau, jika tidak memungkinkan, untuk unit penghasil kas yang mana aset tersebut merupakan bagian daripada unit tersebut.

Pengakuan aset pajak tangguhan

Aset pajak tangguhan diakui untuk seluruh saldo rugi fiskal yang belum digunakan dalam hal terdapat kemungkinan bahwa penghasilan kena pajak akan tersedia untuk dikompensasi terhadap kerugian yang dapat digunakan. Pertimbangan manajemen yang signifikan diperlukan untuk menentukan jumlah aset pajak tangguhan yang dapat diakui, sesuai dengan saat dan jumlah penghasilan kena pajak di masa mendatang seiring dengan strategi perencanaan pajak.

**2. SUMMARY OF ACCOUNTING POLICIES
(continued)**

**af. Use of significant accounting judgments,
estimates and assumptions (continued)**

Estimates and Assumptions (continued)

Impairment of non-financial assets

The Bank's management assesses impairment of non-financial assets whenever events or changes in circumstances indicate that the carrying amount of non-financial asset may not be recoverable.

The factors that the Bank considers important which may lead to impairment assessment are the following:

- a) significant underperformance related to historical expectation or projected future operating results;
- b) significant changes in the manner of use of the assets or the overall business strategy; 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 amount between fair value less costs of disposal using the asset value in use (or cash generating unit). Recoverable amounts are estimated for individual assets or, if not possible, for the cash-generating unit to which the asset belongs.

Recognition of deferred tax assets

Deferred tax assets are recognized for all unused tax losses to the extent that it is probable that taxable income can be compensated against the losses. Significant management judgment is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing and amount of future taxable income together with tax planning strategies.

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2. IKHTISAR KEBIJAKAN AKUNTANSI (lanjutan)

af. Penggunaan pertimbangan, estimasi dan asumsi akuntansi yang signifikan (lanjutan)

Estimasi dan Asumsi (lanjutan)

Pengakuan aset pajak tangguhan (lanjutan)

Bank menelaah aset pajak tangguhan pada setiap tanggal posisi laporan keuangan dan mengurangi jumlah tercatat dalam hal tidak adanya lagi kemungkinan bahwa penghasilan kena pajak yang cukup akan tersedia untuk mengkompensasi sebagian atau seluruh aset pajak tangguhan (Catatan 21).

Nilai kini atas liabilitas imbalan kerja

Biaya atas program pensiun dan imbalan pasca-kerja lainnya ditentukan dengan perhitungan aktuaris. Perhitungan aktuaris melibatkan penggunaan asumsi mengenai tingkat diskonto, tingkat pengembalian yang diharapkan dari aset, kenaikan gaji di masa depan, tingkat kematian dan tingkat kecacatan. Karena program tersebut memiliki sifat jangka panjang, maka perkiraan tersebut memiliki ketidakpastian yang signifikan (Catatan 25).

ag. Perubahan kebijakan akuntansi dan pengungkapan

Bank telah menerapkan standar akuntansi pada tanggal 1 Januari 2021, yang dianggap relevan dengan laporan keuangan, yaitu:

- PSAK 22 (Amandemen 2019), "Kombinasi Bisnis tentang Definisi Bisnis", Amandemen ini diadopsi dari Amandemen IFRS 3 "Business Combinations: Definition of Business" dan merupakan hasil dari joint project antara International Accounting Standards Board (IASB) dan US Financial Accounting Standards Board (FASB). Amandemen ini mengklarifikasi definisi bisnis dengan tujuan untuk membantu entitas dalam menentukan apakah suatu transaksi seharusnya dicatat sebagai kombinasi bisnis atau akuisisi aset.

2. SUMMARY OF ACCOUNTING POLICIES (continued)

af. Use of significant accounting judgments, estimates and assumptions (continued)

Estimates and Assumptions (continued)

Recognition of deferred tax assets (continued)

The Bank reviews its deferred tax assets at each of the statement of financial position reporting date and reduces the carrying amount to the extent that it is no longer probable that sufficient taxable income will be available to compensate part or all of the deferred tax assets (Note 21).

Present value of employee benefits liability

The cost of defined pension plan and other post employment benefits is determined using actuarial valuations. The actuarial valuation involves making assumptions about discount rates, expected rates of return on assets, future salary increases, mortality rates and disability rate. Due to the long-term nature of these plans, such estimates are subject to significant uncertainty (Note 25).

ag. Changes in accounting policies and disclosures

Bank has applied the accounting standards on January 1, 2021, which are considered relevant to the financial statements, namely:

- SFAS 22 (2019 Amendment), "Business Combinations related to Definition of Business", These amendments were adopted from IFRS 3 "Business Combinations: Definition of Business" and is a joint project between International Accounting Standards Board (IASB) dan US Financial Accounting Standards Board (FASB). This amendment clarify the definition of bussiness to help the entity in determine is a transaction should be recorded as bussiness combination or asset acquisition.

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4. GIRO PADA BANK INDONESIA

	31 Desember/December 31, 2021	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Rupiah		517.813.329
Dolar Amerika Serikat	2.785.017	39.693.450
Total		557.506.779

Saldo giro pada Bank Indonesia disediakan untuk memenuhi persyaratan Giro Wajib Minimum (GWM) dari Bank Indonesia. Rasio GWM Bank pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/ December 31, 2021
GWM Utama - Rupiah	3,70%
Harian	0,50%
Rata-rata	3,20%
PLM (dahulu GWM Sekunder) - Rupiah	18,54%
GWM Utama - Mata Uang Asing	4,11%
Harian	2,00%
Rata-rata	2,11%

Pada tanggal-tanggal 31 Desember 2021 dan 2020, GWM dihitung sesuai dengan Peraturan Bank Indonesia (PBI) No. 20/3/PBI/2018 tanggal 29 Maret 2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah dan Unit Usaha Syariah, sebagaimana telah diubah beberapa kali melalui PBI No. 22/3/PBI/2020 tanggal 24 Maret 2020 dan PBI No. 22/10/PBI/2020 tanggal 28 Juli 2020.

PBI tersebut dijelaskan oleh Peraturan Anggota Dewan Gubernur (PADG) No. 20/10/PADG/2018 tanggal 31 Mei 2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah dan Unit Usaha Syariah, sebagaimana telah diubah beberapa kali melalui PADG No. 20/30/PADG/2018 tanggal 30 November 2018, PADG No. 21/14/PADG/2019 tanggal 26 Juni 2019, PADG No. 21/27/PADG/2019 tanggal 26 Desember 2019, PADG No. 22/2/PADG/2020 tanggal 10 Maret 2020, PADG No. 22/10/PADG/2020 tanggal 29 April 2020 dan PADG No. 22/19/PADG/2020 tanggal 29 Juli 2020.

4. CURRENT ACCOUNTS WITH BANK INDONESIA

	31 Desember/December 31, 2020		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	
	7.385.017	652.418.049	Rupiah
		103.759.484	United States Dollar
Total		756.177.533	Total

Current accounts with Bank Indonesia are maintained to comply with Bank Indonesia's Minimum Legal Reserve (GWM) requirements. As of December 31, 2021 and 2020, the GWM ratios of the Bank are as follows:

	31 Desember/ December 31, 2020	
	3,64%	Primary GWM - Rupiah
	0,50%	Daily
	3,14%	Average
PLM (formerly Secondary GWM) - Rupiah	15,17%	
Primary GWM - Foreign Currency	4,12%	
	2,00%	Daily
	2,12%	Average

As of December 31, 2021 and 2020, GWM calculated based on Bank Indonesia's Regulation (PBI) PBI No. 20/3/PBI/2018 dated March 29, 2018 regarding Minimum Legal Reserve in Rupiah and Foreign Currency for Conventional Commercial Bank, Sharia Commercial Bank and Sharia Business Unit, which was amended several times through PBI No. 22/3/PBI/2020 dated March 24, 2020 and PBI No. 22/10/PBI/2020 dated July 28, 2020.

These PBI are described in Governor Council Member's Regulation (PADG) No. 20/10/PADG/2018 dated May 31, 2018 regarding Minimum Legal Reserve in Rupiah and Foreign Currency of Conventional Commercial Bank, Sharia Commercial Bank and Sharia Business Unit, which was amended several times through PADG No. 20/30/PADG/2018 dated November 30, 2018, PADG No. 21/14/PADG/2019 dated June 26, 2019, PADG No. 21/27/PADG/2019 dated December 26, 2019, PADG No. 22/2/PADG/2020 dated March 10, 2020, PADG No. 22/10/PADG/2020 dated April 29, 2020 and PADG No. 22/19/PADG/2020 dated July 29, 2020.

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4. GIRO PADA BANK INDONESIA (lanjutan)

Sedangkan, Rasio Penyangga Likuiditas Makroprudensial (PLM) dihitung melalui PBI No. 20/4/PBI/2018 tanggal 3 April 2018, tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah dan Unit Usaha Syariah yang telah diubah beberapa kali melalui PBI No. 21/12/PBI/2019 tanggal 25 November 2019, PBI No. 22/17/PBI/2020 tanggal 30 September 2020 dan PBI No. 23/17/PBI/2021 tanggal 17 Desember 2021 serta dijelaskan melalui PADG No. 21/22/PADG/2019 tanggal 28 November 2019 yang telah diubah beberapa kali melalui PADG No. 22/11/PADG/2020 tanggal 29 April 2020 dan PADG No. 22/30/PADG/2020 tanggal 5 Oktober 2020.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, sesuai dengan peraturan Anggota Dewan Gubernur dan Bank Indonesia tersebut di atas, Bank harus memenuhi persyaratan GWM Utama dalam rupiah, GWM Utama dalam mata uang asing dan PLM sebesar:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
GWM Utama - Rupiah	3,50%	3,50%	Primary GWM - Rupiah
Harian	0,50%	0,50%	Daily
Rata-rata	3,00%	3,00%	Average
PLM (d/h GWM Sekunder) - Rupiah	6,00%	6,00%	PLM (formerly Secondary GWM) - Rupiah
GWM Utama - Mata Uang Asing	4,00%	4,00%	Primary GWM - Foreign Currency
Harian	2,00%	2,00%	Daily
Rata-rata	2,00%	2,00%	Average

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank juga harus memenuhi RIM dan GWM RIM, jika RIM dan GWM RIM Bank kurang dari batas bawah Bank Indonesia (BI) yaitu sebesar 80% atau melebihi batas atas BI yaitu 94% dengan KPMM Bank lebih kecil dari KPMM insentif BI yang sebesar 14%.

Bank telah memenuhi ketentuan Bank Indonesia tentang rasio-rasio tersebut pada tanggal-tanggal 31 Desember 2021 dan 2020.

4. CURRENT ACCOUNTS WITH BANK INDONESIA (continued)

Meanwhile, the Macroprudential Liquidity Buffer Ratio (PLM) calculated based on PBI No. 20/4/PBI/2018 dated April 3, 2018, regarding Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer for Conventional Commercial Bank, Sharia Commercial Bank and Sharia Business Units, which was amended several times through PBI No. 21/12/PBI/2019 dated November 25, 2019, PBI No. 22/17/PBI/2020 dated September 30, 2020 and PBI No. 23/17/PBI/2021 dated December 17, 2021 and described in PADG No. 21/22/PADG/2019 dated November 28, 2019, which was amended several times through PADG No. 22/11/PADG/2020 dated April 29, 2020 and PADG No. 22/30/PADG/2020 dated October 5, 2020.

As of December 31, 2021 and 2020, based on the above Governor Council Member and Bank Indonesia regulations, the Bank is required to maintain primary GWM in Rupiah, primary GWM in foreign currency and PLM amounting to:

As of December 31, 2021 and 2020, the Bank must maintained RIM and GWM RIM, if the RIM and GWM RIM of Bank is less than the Bank Indonesia (BI) lower limit of 80% or exceeds the BI upper limit of 94% with Bank Capital Adequacy Ratio (CAR) is lower than BI CAR incentives of 14%.

The Bank has complied with Bank Indonesia's regulation regarding the ratio requirement as of December 31, 2021 and 2020.

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5. GIRO PADA BANK LAIN

a) Berdasarkan mata uang

	31 Desember/December 31, 2021		31 Desember/December 31, 2020	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Pihak ketiga				
Dolar Amerika Serikat	8.870.900	126.432.503	21.060.342	295.897.810
Pihak berelasi (Catatan 35)				
Rupiah		26.445.943		14.804.386
Dolar Amerika Serikat	2.800.657	39.916.369	1.522.681	21.393.674
		66.362.312		36.198.060
Total		192.794.815		332.095.870
Cadangan kerugian penurunan nilai		(137.437)		(380.595)
Neto		192.657.378		331.715.275

Third parties
United States Dollar

Related parties (Note 35)
Rupiah
United States Dollar

Total

Allowance for impairment losses

Net

b) Berdasarkan bank

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Dolar Amerika Serikat		
Citibank, N.A., New York	110.583.985	280.598.478
PT Bank Central Asia Tbk	15.848.518	15.299.332
	126.432.503	295.897.810
Pihak berelasi (Catatan 35)		
Rupiah		
PT Bank Rakyat Indonesia (Persero) Tbk	26.159.525	14.517.065
PT Bank Negara Indonesia (Persero) Tbk	245.264	242.049
PT Bank Mandiri (Persero) Tbk	41.154	45.272
	26.445.943	14.804.386
Dolar Amerika Serikat		
PT Bank Rakyat Indonesia (Persero) Tbk	20.513.785	14.350.970
PT Bank Mandiri (Persero) Tbk	19.402.584	7.042.704
	39.916.369	21.393.674
	66.362.312	36.198.060
Total	192.794.815	332.095.870
Cadangan kerugian penurunan nilai	(137.437)	(380.595)
Neto	192.657.378	331.715.275

Third parties
United States Dollar
Citibank, N.A., New York
PT Bank Central Asia Tbk

Related parties (Note 35)
Rupiah
PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Negara Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk

United States Dollar
PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk

Total

Allowance for impairment losses

Net

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5. GIRO PADA BANK LAIN (lanjutan)

c) Berdasarkan kolektibilitas

Pada tanggal-tanggal 31 Desember 2021 dan 2020, seluruh giro pada bank lain diklasifikasikan "lancair".

d) Tingkat suku bunga rata-rata per tahun untuk giro pada bank lain:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah	0,51%	0,42%
Dolar Amerika Serikat	0,03%	0,01%

Rupiah
United States Dollar

e) Cadangan kerugian penurunan nilai

Bank melakukan penilaian cadangan kerugian penurunan nilai atas giro pada bank lain secara kolektif dengan mempertimbangkan adanya bukti obyektif penurunan nilai.

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan:

	31 Desember/December 31, 2021				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	332.095.870	-	-	332.095.870	Beginning carrying amount
Pengukuran kembali bersih nilai tercatat	(139.301.679)	-	-	(139.301.679)	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	50.563	-	-	50.563	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(49.939)	-	-	(49.939)	Derecognized financial assets
Nilai tercatat akhir	192.794.815	-	-	192.794.815	Ending carrying amount

**5. CURRENT ACCOUNTS WITH OTHER BANKS
(continued)**

c) By collectibility

As of December 31, 2021 and 2020, all current accounts with other banks classified as "current".

d) The annual average interest rates for current accounts with other banks:

e) Allowance for impairment losses

The Bank assessed allowance for impairment losses on current accounts with other banks collectively for impairment based on whether an objective evidence of impairment exists.

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category:

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5. GIRO PADA BANK LAIN (lanjutan)

e) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	333.190.020	-	-	333.190.020	Beginning carrying amount
Pengukuran kembali bersih nilai tercatat	(1.094.150)	-	-	(1.094.150)	Net remeasurement of carrying amount
Nilai tercatat akhir	332.095.870	-	-	332.095.870	Ending carrying amount
31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	380.595	-	-	380.595	Balance at the eginning of the year
Pengukuran kembali bersih penyisihan	69.687	-	-	69.687	Net remeasurement of allowance for losses
Aset keuangan yang dihentikan pengakuannya	(194.060)	-	-	(194.060)	Derecognized financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	(118.785)	-	-	(118.785)	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	137.437	-	-	137.437	Allowance for ending expected credit losses

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5. GIRO PADA BANK LAIN (lanjutan)

e) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

	31 Desember/December 31, 2020				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	-	-	-	-	Balance at the beginning of the year
Dampak penerapan awal PSAK 71	197.671	-	-	197.671	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	197.671	-	-	197.671	Allowance for initial expected credit losses SFAS 71
Pengukuran kembali bersih penyisihan	182.924	-	-	182.924	Net remeasurement of allowance for losses
Cadangan atas kerugian kredit ekspektasian akhir	380.595	-	-	380.595	Allowance for ending expected credit losses

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai pada tanggal 31 Desember 2021 dan 2020.

Management believes that the allowance for impairment losses is adequate as of December 31, 2021 and 2020.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, tidak terdapat giro pada bank lain yang digunakan sebagai jaminan dan dibatasi penggunaannya.

As of December 31, 2021 and 2020, there are no current account with other banks used as collateral or restricted.

6. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN

a) Berdasarkan mata uang dan jenis

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
Bank Indonesia		
Term deposit	999.778.520	699.734.152
Deposit facility	374.942.721	184.953.769
	1.374.721.241	884.687.921

6. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS

a) By currency and type

Third parties
Rupiah
Bank Indonesia
Term deposit
Deposit facility

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6. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

a) Berdasarkan mata uang dan jenis (lanjutan)

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga (lanjutan)		
Dolar Amerika Serikat		
Bank Indonesia		
Term deposit	-	632.265.534
	1.374.721.241	1.516.953.455
Pihak berelasi (Catatan 35)		
Rupiah		
Tabungan		
PT Bank Rakyat Indonesia		
(Persero) Tbk	5.738	5.973
Total	1.374.726.979	1.516.959.428
Cadangan kerugian penurunan nilai	-	(621.602)
Neto	1.374.726.979	1.516.337.826

b) Berdasarkan sisa umur jatuh tempo

Klasifikasi jangka waktu penempatan berdasarkan sisa umur sampai dengan saat jatuh tempo adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
≤ 1 bulan	1.374.721.241	884.687.921
Dolar Amerika Serikat		
≤ 1 bulan	-	632.265.534
	1.374.721.241	1.516.953.455
Pihak berelasi (Catatan 35)		
Rupiah		
≤ 1 bulan	5.738	5.973
Total	1.374.726.979	1.516.959.428
Cadangan kerugian penurunan nilai	-	(621.602)
Neto	1.374.726.979	1.516.337.826

c) Berdasarkan kolektibilitas

Pada tanggal-tanggal 31 Desember 2021 dan 2020, seluruh penempatan pada Bank Indonesia dan bank lain diklasifikasikan "lancair".

6. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

a) By currency and type (continued)

Third parties (continued)	
United States Dollar	
Bank Indonesia	
Term deposit	
Related parties (Note 35)	
Rupiah	
Saving Deposits	
PT Bank Rakyat Indonesia	
(Persero) Tbk	
Total	
Allowance for impairment losses	
Net	

b) By remaining period to maturity

The classification of placement based on the remaining period to maturity are as follows:

Third parties	
Rupiah	
≤ 1 month	
United States Dollar	
≤ 1 month	
Related parties (Note 35)	
Rupiah	
≤ 1 month	
Total	
Allowance for impairment losses	
Net	

c) By collectibility

As of December 31, 2021 and 2020, all placements with Bank Indonesia and other banks were classified as "current".

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6. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

- d) Tingkat suku bunga rata-rata per tahun untuk penempatan pada Bank Indonesia dan bank lain:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah		
Deposit facility	2,78%	3,54%
Term deposit	2,95%	4,05%
Tabungan	1,00%	1,00%
Dolar Amerika Serikat		
Term deposit	0,02%	0,41%

- e) Cadangan kerugian penurunan nilai

Bank melakukan penilaian cadangan kerugian penurunan nilai atas penempatan pada Bank Indonesia dan bank lain secara kolektif dengan mempertimbangkan adanya bukti obyektif penurunan nilai.

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan:

	31 Desember/December 31, 2021				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	1.516.959.428	-	-	1.516.959.428	Beginning carrying amount
Pengukuran kembali bersih nilai tercatat	(236)	-	-	(236)	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	2.150.697.086	-	-	2.150.697.086	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(2.292.929.299)	-	-	(2.292.929.299)	Derecognized financial assets
Nilai tercatat akhir	1.374.726.979	-	-	1.374.726.979	Ending carrying amount

6. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

- d) The annual average interest rate for placement with Bank Indonesia and other banks:

Rupiah	
Deposit facility	
Term deposit	
Saving Deposits	
United States Dollar	
Term deposit	

- e) Allowance for impairment losses

The Bank assessed allowance for impairment losses on placements with Bank Indonesia and other banks collectively based on whether an objective evidence of impairment exists.

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category:

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e) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	732.580.072	-	-	732.580.072	Beginning carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	1.516.959.428	-	-	1.516.959.428	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(732.580.072)	-	-	(732.580.072)	Derecognized financial assets
Nilai tercatat akhir	1.516.959.428	-	-	1.516.959.428	Ending carrying amount
31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	621.602	-	-	621.602	Balance at the beginning of the year
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(785.356)	-	-	(785.356)	Derecognized financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	163.754	-	-	163.754	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	-	-	-	-	Allowance for ending expected credit losses

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6. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

e) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

	31 Desember/December 31, 2020				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	-	-	-	-	Balance at the beginning of the year
Dampak penerapan awal PSAK 71	170.743	-	-	170.743	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	170.743	-	-	170.743	Allowance for initial expected credit losses SFAS 71
Aset keuangan baru yang diterbitkan atau dibeli	621.602	-	-	621.602	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(170.743)	-	-	(170.743)	Derecognized financial assets
Cadangan atas kerugian kredit ekspektasian akhir	621.602	-	-	621.602	Allowance for ending expected credit losses

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai tidak diperlukan pada tanggal 31 Desember 2021, karena manajemen berkeyakinan bahwa penempatan pada Bank Indonesia dan bank lain dapat tertagih dan telah memadai pada tanggal 31 Desember 2020.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, tidak terdapat penempatan pada Bank Indonesia dan bank lain yang digunakan sebagai jaminan dan dibatasi penggunaannya.

6. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

e) Allowance for impairment losses (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

Management believes that the allowance for impairment losses is not necessary as of December 31, 2021, because management believes that placement with Bank Indonesia and other banks are fully collectible and is adequate as of December 31, 2020.

As of December 31, 2021 and 2020, there are no placement with Bank Indonesia and other banks used as collateral or restricted.

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7. EFEK-EFEK

a) Berdasarkan tujuan, mata uang dan jenis

7. SECURITIES

a) By purpose, currency and type

	31 Desember/December 31, 2021		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah equivalent	
Nilai wajar melalui laba rugi			Fair value through profit or loss
Pihak berelasi (Catatan 35)			Related parties (Note 35)
Rupiah			Rupiah
Surat Perbendaharaan Negara		99.220.000	Government treasury bills
Obligasi pemerintah		60.714.000	Government bonds
		159.934.000	
Nilai wajar melalui penghasilan			Fair value through
komprehensif lain			other comprehensive income
Pihak berelasi (Catatan 35)			Related parties (Note 35)
Rupiah			Rupiah
Obligasi pemerintah		2.208.849.712	Government bonds
Obligasi		10.710.000	Bonds
		2.219.559.712	
Dolar Amerika Serikat			United States Dollar
Obligasi pemerintah	7.082.995	100.950.386	Government Bonds
		2.320.510.098	
Biaya perolehan diamortisasi			Amortized cost
Pihak ketiga			Third parties
Rupiah			Rupiah
Obligasi		99.729.949	Bonds
Negotiable Certificate of Deposits		96.675.667	Negotiable Certificate of Deposits
		196.405.616	
Pihak berelasi (Catatan 35)			Related parties (Note 35)
Rupiah			Rupiah
Obligasi		499.382.745	Bonds
Obligasi pemerintah		298.279.151	Government bonds
Medium-Term Note		11.000.000	Medium-Term Note
Obligasi Sukuk		10.000.000	Sukuk
		818.661.896	
		1.015.067.512	
Total		3.495.511.610	Total
Cadangan kerugian penurunan nilai		(3.654.228)	Allowance for impairment losses
Neto		3.491.857.382	Net

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7. EFEK-EFEK (lanjutan)

- a) Berdasarkan tujuan, mata uang dan jenis (lanjutan)

7. SECURITIES (continued)

- a) By purpose, currency and type (continued)

	31 Desember/December 31, 2020	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah equivalent
Nilai wajar melalui laba rugi Pihak berelasi (Catatan 35) Rupiah		Fair value through profit or loss Related parties (Note 35) Rupiah
Surat Perbendaharaan Negara	490.540.000	Government treasury bills
Obligasi pemerintah	60.780.000	Government bonds
	551.320.000	
Nilai wajar melalui penghasilan komprehensif lain Pihak ketiga Rupiah		Fair value through other comprehensive income Third parties Rupiah
Obligasi	45.247.500	Bonds
Pihak berelasi (Catatan 35) Rupiah		Related parties (Note 35) Rupiah
Obligasi pemerintah	1.939.666.176	Government bonds
Obligasi	10.575.000	Bonds
	1.950.241.176	
Dolar Amerika Serikat		United States Dollar
Obligasi pemerintah	14.410.104	Government Bonds
	2.152.703.143	
	2.197.950.643	
Biaya perolehan diamortisasi Pihak ketiga Rupiah		Amortized cost Third parties Rupiah
Medium-Term Note	50.000.000	Medium-Term Note
Obligasi	35.065.380	Bonds
	85.065.380	
Pihak berelasi (Catatan 35) Rupiah		Related parties (Note 35) Rupiah
Obligasi	432.258.784	Bonds
Obligasi pemerintah	79.225.949	Government bonds
Medium-Term Note	11.000.000	Medium-Term Note
Obligasi Sukuk	10.000.000	Sukuk
	532.484.733	
	617.550.113	
Total	3.366.820.756	Total
Cadangan kerugian penurunan nilai	(6.079.579)	Allowance for impairment losses
Neto	3.360.741.177	Net

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7. EFEK-EFEK (lanjutan)

b) Berdasarkan sisa umur jatuh tempo

Klasifikasi jangka waktu efek-efek berdasarkan sisa umur sampai dengan saat jatuh tempo adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
> 3 bulan - 1 tahun	196.405.616	95.247.500
> 1 tahun	-	35.065.380
	196.405.616	130.312.880
Pihak berelasi (Catatan 35)		
Rupiah		
≤ 1 bulan	159.934.000	551.320.000
> 1 bulan - 3 bulan	50.000.000	-
> 3 bulan - 1 tahun	2.365.326.076	2.034.271.628
> 1 tahun	622.895.532	448.454.281
	3.198.155.608	3.034.045.909
Dolar Amerika Serikat		
> 3 bulan - 1 tahun	100.950.386	202.461.967
	3.299.105.194	3.236.507.876
Total	3.495.511.610	3.366.820.756
Cadangan kerugian penurunan nilai	(3.654.228)	(6.079.579)
Neto	3.491.857.382	3.360.741.177

c) Berdasarkan kolektibilitas

Pada tanggal-tanggal 31 Desember 2021 dan 2020, seluruh efek-efek diklasifikasikan "lancar".

7. SECURITIES (continued)

b) By remaining period to maturity

The classification of securities period based on the remaining period to maturity are as follows:

Third parties
Rupiah
> 3 months - 1 year
> 1 year

Related parties (Note 35)
Rupiah
≤ 1 month
> 1 month - 3 months
> 3 months - 1 year
> 1 year

United States Dollar
> 3 months - 1 year

Total

Allowance for impairment losses

Net

c) By collectability

As of December 31, 2021 and 2020, all securities were classified as "current".

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit

1) Obligasi pemerintah

Obligasi pemerintah merupakan obligasi yang diterbitkan oleh Negara Republik Indonesia, termasuk Surat Perbendaharaan Negara (SPN), dalam rangka pengelolaan portofolio surat utang negara.

7. SECURITIES (continued)

d) By type and issuer

1) Government bonds

Government bonds represent bonds issued by the Republic of Indonesia, including Government treasury bills, in connection with the management of government debentures portfolio.

31 Desember/December 31, 2021

	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai wajar/ nilai tercatat/ Fair value/ carrying amount	
Nilai wajar melalui laba rugi Pihak berelasi (Catatan 35) Rupiah				Fair value through profit or loss Related parties (Note 35) Rupiah
FR0064 ^{*)}	6,13	15 Mei/ May 15, 2028	30.498.000	FR0064 ^{*)}
FR0065 ^{*)}	6,63	15 Mei/ May 15, 2033	30.216.000	FR0065 ^{*)}
SPN12220331	-	31 Maret/ March 31, 2022	99.220.000	SPN12220331
			159.934.000	
Nilai wajar melalui penghasilan komprehensif lain Pihak berelasi (Catatan 35) Rupiah				Fair value through other comprehensive income Related parties (Note 35) Rupiah
FR0046	9,50	15 Juli/ July 15, 2023	21.686.000	FR0046
FR0056	8,38	15 September/ September 15, 2026	45.176.000	FR0056
FR0059	7,00	15 Mei/ May 15, 2027	42.904.000	FR0059
FR0061	7,00	15 Mei/ May 15, 2022	86.156.000	FR0061
FR0062	6,38	15 April/ April 15, 2042	19.538.000	FR0062
FR0063	5,63	15 Mei/ May 15, 2023	51.275.000	FR0063
FR0064 ^{*)}	6,13	15 Mei/ May 15, 2028	45.747.000	FR0064 ^{*)}
FR0065 ^{*)}	6,63	15 Mei/ May 15, 2033	70.504.000	FR0065 ^{*)}
FR0070	8,38	15 Maret/ March 15, 2024	119.636.000	FR0070
FR0072	8,25	15 Mei/ May 15, 2036	27.594.600	FR0072
FR0073	8,75	15 Mei/ May 15, 2031	83.505.540	FR0073
FR0075	7,50	15 Mei/ May 15, 2038	196.880.836	FR0075
FR0077	8,13	15 Mei/ May 15, 2024	103.331.500	FR0077

^{*)} Termasuk efek-efek yang merupakan *underlying* dari reksadana terproteksi dimana Bank sebagai satu-satunya pihak yang memegang unit reksadana tersebut.

^{*)} Include securities which represents the *underlying* securities of protected mutual fund, whereas the Bank is the only party who holds the mutual fund unit.

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit (lanjutan)

1) Obligasi pemerintah (lanjutan)

7. SECURITIES (continued)

d) By type and issuer (continued)

1) Government bonds (continued)

31 Desember/December 31, 2021				
	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai wajar/ nilai tercatat/ Fair value/ carrying amount	
Nilai wajar melalui penghasilan komprehensif lain (lanjutan) Pihak berelasi (Catatan 35) (lanjutan) Rupiah				Fair value through other comprehensive income (continued) Related parties (Note 35) (continued) Rupiah
FR0081	6,50	15 Juni/ June 15, 2025	121.325.000	FR0081
FR0082	7,00	15 September/ September 15, 2030	62.298.000	FR0082
FR0084	7,25	15 Februari/ February 15, 2026	161.790.000	FR0084
FR0085	7,75	15 April/ April 15, 2031	164.175.000	FR0085
FR0086	5,50	15 April/ April 15, 2026	91.395.000	FR0086
FR0087	6,50	15 Februari/ February 15, 2031	257.269.500	FR0087
FR0088	6,25	15 Juni/ June 15, 2036	9.987.000	FR0088
FR0090	5,13	15 April/ April 15, 2027	43.613.848	FR0090
FR0091	6,38	15 April/ April 15, 2032	10.053.888	FR0091
PBS017	6,13	15 Oktober/ October 15, 2025	145.922.000	PBS017
ORI017	6,40	15 Juli/ July 15, 2023	51.765.000	ORI017
ORI018	5,70	15 Oktober/ October 15, 2023	123.816.000	ORI018
SR013	6,05	10 September/ September 10, 2023	51.505.000	SR013
			2.208.849.712	
Dolar Amerika Serikat				United States Dollar
INDON 22 3.4	3,40	29 Maret/ March 29, 2022	29.666.507	INDON 22 3.4
INDON 22 3.7	3,70	8 Januari/ January 8, 2022	71.283.879	INDON 22 3.7
			100.950.386	
			2.309.800.098	
Biaya perolehan diamortisasi Pihak berelasi (Catatan 35) Rupiah				Amortized cost Related parties (Note 35) Rupiah
FR0040	11,00	15 September/ September 15, 2025	36.195.085	FR0040
FR0061	7,00	15 Mei/ May 15, 2022	59.909.268	FR0061
FR0063	5,63	15 Mei/ May 15, 2023	25.363.766	FR0063

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit (lanjutan)

1) Obligasi pemerintah (lanjutan)

7. SECURITIES (continued)

d) By type and issuer (continued)

1) Government bonds (continued)

31 Desember/December 31, 2021				
	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai wajar/ nilai tercatat/ Fair value/ carrying amount	
Biaya perolehan diamortisasi (lanjutan)				Amortized cost (continued)
Pihak berelasi (Catatan 35)				Related parties (Note 35)
(lanjutan)				(continued)
Rupiah				Rupiah
FR0070	8,38	15 Maret/ March 15, 2024	53.346.260	FR0070
FR0077	8,13	15 Mei/ May 15, 2024	10.840.550	FR0077
FR0081	6,50	15 Juni/ June 15, 2024	31.538.370	FR0081
PBS002	5,45	15 Desember/ December 15, 2022	30.014.375	PBS002
ORI016	6,80	15 Oktober/ October 15, 2022	30.606.805	ORI016
ORI019	5,57	15 Februari/ February 15, 2024	20.464.672	ORI019
			298.279.151	
Total			2.768.013.249	Total

31 Desember/December 31, 2020				
	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai wajar/ nilai tercatat/ Fair value/ carrying amount	
Nilai wajar melalui laba rugi				Fair value through
Pihak berelasi (Catatan 35)				profit or loss
Rupiah				Related parties (Note 35)
				Rupiah
FR0064 ¹⁾	6,13	15 Mei/ May 15, 2028	30.324.000	FR0064 ¹⁾
FR0065 ¹⁾	6,63	15 Mei/ May 15, 2033	30.456.000	FR0065 ¹⁾
SPN12211007	-	7 Oktober/ October 7, 2021	97.300.000	SPN12211007
SPN12210701	-	1 Juli/ July 1, 2021	393.240.000	SPN12210701
			551.320.000	

¹⁾ Termasuk efek-efek yang merupakan *underlying* dari reksadana terproteksi dimana Bank sebagai satu-satunya pihak yang memegang unit reksadana tersebut.

¹⁾ Include securities which represents the *underlying* securities of protected mutual fund, whereas the Bank is the only party who holds the mutual fund unit.

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit (lanjutan)

1) Obligasi pemerintah (lanjutan)

7. SECURITIES (continued)

d) By type and issuer (continued)

1) Government bonds (continued)

31 Desember/December 31, 2020

	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai wajar/ nilai tercatat/ Fair value/ carrying amount	
Nilai wajar melalui penghasilan komprehensif lain Pihak berelasi (Catatan 35) Rupiah				Fair value through other comprehensive income Related parties (Note 35) Rupiah
FR0046	9,50	15 Juli/ July 15, 2023	22.354.000	FR0046
FR0053	8,25	15 Juli/ July 15, 2021	70.134.720	FR0053
FR0056	8,38	15 September/ September 15, 2026	45.712.000	FR0056
FR0059	7,00	15 Mei/ May 15, 2027	89.428.076	FR0059
FR0061	7,00	15 Mei/ May 15, 2022	36.260.000	FR0061
FR0062	6,38	15 April/ April 15, 2042	18.730.000	FR0062
FR0063	5,63	15 Mei/ May 15, 2023	51.400.000	FR0063
FR0064 ¹⁾	6,13	15 Mei/ May 15, 2028	45.486.000	FR0064 ¹⁾
FR0065 ¹⁾	6,63	15 Mei/ May 15, 2033	71.064.000	FR0065 ¹⁾
FR0070	8,38	15 Maret/ March 15, 2024	121.033.000	FR0070
FR0072	8,25	15 Mei/ May 15, 2036	28.934.554	FR0072
FR0073	8,75	15 Mei/ May 15, 2031	86.099.465	FR0073
FR0075	7,50	15 Mei/ May 15, 2038	310.790.861	FR0075
FR0077	8,13	15 Mei/ May 15, 2024	104.053.500	FR0077
FR0081	6,50	15 Juni/ June 15, 2025	52.450.000	FR0081
FR0082	7,00	15 September/ September 15, 2030	64.620.000	FR0082
FR0084	7,25	15 Februari/ February 15, 2026	161.850.000	FR0084
FR0085	7,75	15 April/ April 15, 2031	167.280.000	FR0085
FR0086	5,50	15 April/ April 15, 2026	30.291.000	FR0086
FR0087	6,50	15 Februari/ February 15, 2031	103.630.000	FR0087

¹⁾ Termasuk efek-efek yang merupakan *underlying* dari reksadana terproteksi dimana Bank sebagai satu-satunya pihak yang memegang unit reksadana tersebut.

¹⁾ Include securities which represents the *underlying* securities of protected mutual fund, whereas the Bank is the only party who holds the mutual fund unit.

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit (lanjutan)

1) Obligasi pemerintah (lanjutan)

7. SECURITIES (continued)

d) By type and issuer (continued)

1) Government bonds (continued)

31 Desember/December 31, 2020				
	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai wajar/ nilai tercatat/ Fair value/ carrying amount	
Nilai wajar melalui penghasilan komprehensif lain (lanjutan) Pihak berelasi (Catatan 35) (lanjutan) Rupiah				Fair value through other comprehensive income (continued) Related parties (Note 35) (continued) Rupiah
PBS017	6,13	15 Oktober/ October 15, 2025	103.080.000	PBS017
ORI015	8,25	15 Oktober/ October 15, 2021	51.640.000	ORI015
ORI017	6,40	15 Juli/ July 15, 2023	51.915.000	ORI017
SR013	6,05	10 September/ September 10, 2023	51.430.000	SR013
			1.939.666.176	
Dolar Amerika Serikat				United States Dollar
INDON 21	4,88	15 Mei/ May 15, 2021	99.658.055	INDON 21
INDON 22 3.4	5,88	29 Maret/ March 29, 2022	29.996.812	INDON 22 3.4
INDON 22 3.7	3,90	8 Januari/ January 8, 2022	72.807.100	INDON 22 3.7
			202.461.967	
			2.142.128.143	
Biaya perolehan diamortisasi Pihak berelasi (Catatan 35) Rupiah				Amortized cost Related parties (Note 35) Rupiah
FR0053	8,25	15 Juli/ July 15, 2021	30.030.452	FR0053
FR0061	7,00	15 Mei/ May 15, 2022	49.195.497	FR0061
			79.225.949	
Total			2.772.674.092	Total

Nilai pasar obligasi pemerintah yang diklasifikasikan "Nilai wajar melalui laba rugi" dan "Nilai wajar melalui penghasilan komprehensif lain" berkisar antara 97,69% sampai dengan 115,25% pada tanggal 31 Desember 2021.

The market value of government bonds which are classified as "Fair value through profit or loss" and "Fair value through other comprehensive income" ranged from 97.69% up to 115.25% as of December 31, 2021.

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit (lanjutan)

1) Obligasi pemerintah (lanjutan)

Nilai pasar obligasi pemerintah yang diklasifikasikan "Nilai wajar melalui laba rugi" dan "Nilai wajar melalui penghasilan komprehensif lain" berkisar antara 93,65% sampai dengan 118,83% pada tanggal 31 Desember 2020.

2) Obligasi

7. SECURITIES (continued)

d) By type and issuer (continued)

1) Government bonds (continued)

The market value of government bonds which are classified as "Fair value through profit or loss" and "Fair value through other comprehensive income" ranged from 93.65% up to 118.83% as of December 31, 2020.

2) Bonds

31 Desember/December 31, 2021

Penerbit dan seri/ Issuer and series	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/Rating	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Nilai wajar melalui penghasilan komprehensif lain/ Fair value through other comprehensive income				
Pihak berelasi (Catatan 35)/ Related parties (Note 35)				
Rupiah				
PT Bank Rakyat Indonesia (Persero) Tbk Tahap I Seri D 2016/ Phase I Series D 2016	8,65	1 Desember/ December 1, 2023	idAAA	10.710.000
Biaya perolehan diamortisasi/ Amortized cost				
Pihak ketiga/Third parties				
Rupiah				
PT Bank Pembangunan Daerah Jawa Barat dan Banten, Tbk. Tahap I Seri B 2017/ Phase I Series B 2017	8,15	6 Desember/ December 6, 2022	idAA-	65.674.172
PT Bank Pembangunan Daerah Jawa Tengah Subordinasi I 2015/ Subordination I 2015	12,25	18 Desember/ December 18, 2022	idAA-	34.055.777
				99.729.949
Pihak berelasi (Catatan 35)/ Related parties (Note 35)				
Rupiah				
PT Perusahaan Listrik Negara (Persero) Berkelanjutan III Tahap III Seri B 2019/Sustainable III Phase III Series B 2019	9,10	19 Februari/ February 19, 2024	idAAA	240.488.202
Berkelanjutan III Tahap III Seri A 2019/Sustainable III Phase III Series A 2019	8,50	19 Februari/ February 19, 2022	idAAA	50.000.000

^{*)} Berdasarkan peringkat yang diterbitkan oleh PT Pemeringkat Efek Indonesia (Pefindo)

^{*)} Based on rating issued by PT Pemeringkat Efek Indonesia (Pefindo)

The original financial statements included herein are in the Indonesian language.

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7. EFEK-EFEK (lanjutan)

- d) Berdasarkan jenis dan penerbit (lanjutan)
- 2) Obligasi (lanjutan)

7. SECURITIES (continued)

- d) By type and issuer (continued)
- 2) Bonds (continued)

31 Desember/December 31, 2021

Penerbit dan seri/ Issuer and series	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/Rating	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Biaya perolehan diamortisasi (lanjutan)/Amortized cost (continued)				
Pihak berelasi (Catatan 35) (lanjutan)/Related parties (Note 35) (continued)				
Rupiah				
PT Sarana Multigriya Finansial (Persero) Berkelanjutan VI Tahap II 2021/ Sustainable VI Phase II 2021	6,00	17 November/ November 17, 2026	idAAA	64.000.000
Berkelanjutan VI Tahap I Seri B 2021/Sustainable VI Phase I Series B 2021	6,40	8 Juli/ July 8, 2026	idAAA	11.000.000
PT Kereta Api Indonesia (Persero) Berkelanjutan II Seri A 2019/ Sustainable II Series A 2019	7,75	13 Desember/ December 13, 2024	idAA+	35.000.000
PT Adhi Karya (Persero) Tbk Berkelanjutan II Tahap I 2017/ Sustainable II Phase I 2017	9,25	22 Juni/ June 22, 2022	idA-	30.162.936
PT Bank Tabungan Negara Berkelanjutan Tahap II 2013/ Sustainable Phase II 2013	7,75	27 Maret/ March 27, 2023	idAAA	20.354.399
PT Indonesia Infrastructure Finance Berkelanjutan Tahap I Seri B 2019/Sustainable Phase I Series B 2019	7,75	18 Desember/ December 18, 2022	idAAA	20.000.000
PT Bank Mandiri Taspen Tahap I Seri B 2019/ Phase I Series B 2019	8,20	26 November/ November 26, 2024	idAA	18.003.640
PT Bank Mandiri (Persero) Tbk Berkelanjutan I Tahap II Seri A 2017/Sustainable I Phase I Series A 2017	8,50	21 September September 21, 2023	idAAA	5.286.212
Berkelanjutan I Tahap III 2018/ Sustainable I Phase III 2018	8,00	15 Juni June 15, 2022	idAAA	5.087.356
PT Industri Kereta Api Mudharabah I 2020/ Mudharabah I 2020	9,35	24 Februari/ February 24, 2023	idBBB+	10.000.000
Total				509.382.745
				619.822.694

¹⁾ Berdasarkan peringkat yang diterbitkan oleh PT Pemeringkat Efek Indonesia (Pefindo)

¹⁾ Based on rating issued by PT Pemeringkat Efek Indonesia (Pefindo)

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- d) Berdasarkan jenis dan penerbit (lanjutan)
- 2) Obligasi (lanjutan)

7. SECURITIES (continued)

- d) By type and issuer (continued)
- 2) Bonds (continued)

31 Desember/December 31, 2020

Penerbit dan seri/ Issuer and series	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/Rating ¹⁾	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Nilai wajar melalui penghasilan komprehensif lain/ Fair value through other comprehensive income				
Pihak ketiga/Third parties				
Rupiah				
PT Medco Energi Internasional Tbk Berkelanjutan III Tahun 2018 Seri A/Sustainable III Series A 2018	8,75	29 Maret/ March 29, 2021	idA+	45.247.500
Pihak berelasi (Catatan 35)/ Related parties (Note 35)				
Rupiah				
PT Bank Rakyat Indonesia (Persero) Tbk Tahap I Seri D 2016/ Phase I Series D 2016	8,65	1 Desember/ December 1, 2023	idAAA	10.575.000
				55.822.500
Biaya perolehan diamortisasi/ Amortized cost				
Pihak ketiga/Third parties				
Rupiah				
PT Bank Pembangunan Daerah Jawa Tengah Subordinasi I 2015/ Subordination I 2015	12,25	18 Desember/ December 18, 2022	idAA-	35.065.380
Pihak berelasi (Catatan 35)/ Related parties (Note 35)				
Rupiah				
PT Perusahaan Listrik Negara (Persero) Berkelanjutan III Tahap III Seri B 2019/Sustainable III Phase III Series B 2019	9,10	19 Februari/ February 19, 2024	idAAA	242.770.261
Berkelanjutan III Tahap III Seri A 2019/Sustainable III Phase III Series A 2019	8,50	19 Februari/ February 19, 2022	idAAA	50.000.000
Lembaga Pembiayaan Ekspor Indonesia Berkelanjutan IV Tahap III Seri B 2018/Sustainable IV Phase III Series B 2018	8,75	8 November/ November 8, 2021	idAAA	50.000.000
PT Kereta Api Indonesia (Persero) Berkelanjutan II Seri A 2019/ Sustainable II Series A 2019	7,75	13 Desember/ December 13, 2024	idAA+	35.000.000
PT Adhi Karya (Persero) Tbk Berkelanjutan II Tahap I 2017/ Sustainable II Phase I 2017	9,25	22 Juni/ June 22, 2022	idA-	30.488.523
PT Indonesia Infrastructure Finance Berkelanjutan Tahap I Seri B 2019/Sustainable Phase I Series B 2019	7,75	18 Desember/ December 18, 2022	idAAA	20.000.000

¹⁾ Berdasarkan peringkat yang diterbitkan oleh PT Pemeringkat Efek Indonesia (Pefindo)

¹⁾ Based on rating issued by PT Pemeringkat Efek Indonesia (Pefindo)

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7. EFEK-EFEK (lanjutan)

- d) Berdasarkan jenis dan penerbit (lanjutan)
- 2) Obligasi (lanjutan)

7. SECURITIES (continued)

- d) By type and issuer (continued)
- 2) Bonds (continued)

31 Desember/December 31, 2020

Penerbit dan seri/ Issuer and series	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/Rating ¹⁾	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Biaya perolehan diamortisasi (lanjutan)/Amortized cost (continued)				
Pihak berelasi (Catatan 35) (lanjutan)/Related parties (Note 35) (continued)				
Rupiah (lanjutan)/(continued)				
PT Industri Kereta Api Mudharabah I 2020/ Mudharabah I 2020	9,35	24 Februari/ February 24, 2023	idBBB+	10.000.000
PT Bank Rakyat Indonesia (Persero) Tbk Tahap III Seri C 2016/ Phase III Series C 2016	8,70	25 Mei/ May 25, 2021	idAAA	4.000.000
				442.258.784
Total				533.146.664

¹⁾ Berdasarkan peringkat yang diterbitkan oleh PT Pemeringkat Efek Indonesia (Pefindo)

¹⁾ Based on rating issued by PT Pemeringkat Efek Indonesia (Pefindo)

3) Medium-Term Notes (MTN)

3) Medium-Term Notes (MTN)

31 Desember/December 31, 2021

Penerbit/Issuer	Nilai nominal/ Nominal value	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Biaya perolehan diamortisasi/ Amortized cost				
Pihak berelasi (Catatan 35)/ Related parties (Note 35)				
Rupiah				
PT Perkebunan Nusantara II Tahap VIII Seri A/ Phase VIII Series A	10.000.000	11,00	26 Juni/ June 26, 2024	10.000.000
Tahap VIII Seri B/ Phase VIII Series B	1.000.000	11,00	31 Oktober / October 31, 2024	1.000.000
Total				11.000.000

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7. EFEK-EFEK (lanjutan)

d) Berdasarkan jenis dan penerbit (lanjutan)

3) *Medium-Term Notes* (MTN) (lanjutan)

31 Desember/December 31, 2020				
Penerbit/Issuer	Nilai nominal/ Nominal value	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Biaya perolehan diamortisasi/ Amortized cost				
Pihak ketiga/Third parties				
Rupiah				
PT Indah Kiat Pulp & Paper Tbk Seri VII 2018/Series VII 2018	50.000.000	10,25	20 April/ April 20, 2021	50.000.000
Pihak Berelasi (Catatan 35)/ Related parties (Note 35)				
Rupiah				
PT Perkebunan Nusantara II Tahap VIII Seri A/ Phase VIII Series A	10.000.000	11,00	26 Juni/ June 26, 2024	10.000.000
Tahap VIII Seri B/ Phase VIII Series B	1.000.000	11,00	31 Oktober / October 31, 2024	1.000.000
				11.000.000
Total				61.000.000

4) *Negotiable Certificate of Deposits* (NCD)

7. SECURITIES (continued)

d) *By type and issuer (continued)*

3) *Medium-Term Notes* (MTN) (continued)

31 Desember/December 31, 2021

Penerbit/Issuer	Nilai nominal/ Nominal value	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal jatuh tempo/ Maturity date	Nilai tercatat/ nilai wajar/ Carrying amount/ Fair value
Biaya perolehan diamortisasi/ Amortized cost				
Pihak ketiga/Third parties				
Rupiah				
PT Bank Maybank Indonesia Seri C/Series C	70.000.000	3,75	9 September/ September 9, 2022	67.604.616
PT Bank DKI Tahap I Seri B/Phase I Series B	30.000.000	4,65	8 Desember/ December 8, 2022	29.071.051
Total				96.675.667

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7. EFEK-EFEK (lanjutan)

- e) Tingkat suku bunga rata-rata per tahun untuk efek-efek:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah	6,36%	6,44%
Dolar Amerika Serikat	0,78%	4,21%

- f) Untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020, Bank mengakui keuntungan yang belum direalisasi neto dari perubahan nilai wajar efek-efek yang diklasifikasikan "Nilai wajar melalui laba rugi" sebesar Rp644.000 dan Rp6.678.710, yang disajikan pada akun "Keuntungan yang belum direalisasi dari perubahan nilai wajar efek-efek - neto" di laporan laba rugi dan penghasilan komprehensif lain.
- g) Bank mengakui keuntungan neto atas penjualan efek-efek sebesar Rp33.943.001 dan Rp35.555.901 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020, yang disajikan dalam akun "Keuntungan dari penjualan efek-efek - neto" di laporan laba rugi dan penghasilan komprehensif lain.
- h) Cadangan kerugian penurunan nilai
- Bank melakukan penilaian atas penurunan nilai efek-efek secara kolektif dengan adanya bukti obyektif penurunan nilai.

7. SECURITIES (continued)

- e) The annual average interest rates for securities:

Rupiah
United States Dollar

- f) For the year ended Desember 31, 2021 and 2020, the Bank recognized net unrealized gain on changes in the fair value of securities classified as "Fair value through profit or loss" amounting to Rp644,000 and Rp6,678,710, which is presented under "Unrealized gain on changes in fair value of securities - net" account in the statement of profit or loss and other comprehensive income.
- g) The Bank recognized net gain resulting from the sale of securities amounting to Rp33,943,001 and Rp35,555,901 for the year ended December 31, 2021 and 2020, respectively, which are recorded under "Gain on sale of securities - net" in the statement of profit or loss and other comprehensive income.
- h) Allowance for impairment losses
- The Bank assessed collectively for impairment on securities based on whether an objective evidence of impairment exists.

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7. EFEK-EFEK (lanjutan)

h) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan:

	31 Desember/December 31, 2021			
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain				
Nilai tercatat awal	2.197.950.643	-	-	2.197.950.643
Pengukuran kembali bersih nilai tercatat	(74.011.604)	-	-	(74.011.604)
Aset keuangan baru yang diterbitkan atau dibeli	564.714.272	-	-	564.714.272
Aset keuangan yang dihentikan pengakuannya	(368.143.213)	-	-	(368.143.213)
Nilai tercatat akhir	2.320.510.098	-	-	2.320.510.098

Securities measured at fair value through other comprehensive income
Beginning carrying amount
Net remeasurement of carrying amount
New financial asset issued or purchased
Derecognized financial assets
Ending carrying amount

	31 Desember/December 31, 2020			
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain				
Nilai tercatat awal	1.332.139.967	-	-	1.332.139.967
Pengukuran kembali bersih nilai tercatat	57.524.511	-	-	57.524.511
Aset keuangan baru yang diterbitkan atau dibeli	1.306.034.264	-	-	1.306.034.264
Aset keuangan yang dihentikan pengakuannya	(497.748.099)	-	-	(497.748.099)
Nilai tercatat akhir	2.197.950.643	-	-	2.197.950.643

Securities measured at fair value through other comprehensive income
Beginning carrying amount
Net remeasurement of carrying amount
New financial asset issued or purchased
Derecognized financial assets
Ending carrying amount

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7. EFEK-EFEK (lanjutan)

h) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

	31 Desember/December 31, 2021			
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain				
Saldo awal tahun	1.596.496	-	-	1.596.496
Pengukuran kembali bersih penyisihan	(366.350)	-	-	(366.350)
Aset keuangan baru yang diterbitkan atau dibeli	62.309	-	-	62.309
Aset keuangan yang dihentikan pengakuannya	(1.251.395)	-	-	(1.251.395)
Perubahan model atau parameter valuta asing dan perubahan lain	46.169	-	-	46.169
Cadangan atas kerugian kredit ekspektasian akhir	87.229	-	-	87.229

	31 Desember/December 31, 2020			
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain				
Saldo awal tahun	-	-	-	-
Dampak penerapan awal PSAK 71	607.910	-	-	607.910
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	607.910	-	-	607.910

7. SECURITIES (continued)

h) Allowance for impairment losses (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

Securities measured at fair value through other comprehensive income
Balance at the beginning of the year
Net remeasurement of allowance for losses
New financial asset issued or purchased
Derecognized financial assets
Changes in foreign exchange models or parameters and other changes
Allowance for ending expected credit losses

Securities measured at fair value through other comprehensive income
- Balance at the beginning of the year
Impact on initial adoption of SFAS 71
Allowance for initial expected credit losses SFAS 71

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7. EFEK-EFEK (lanjutan)

h) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

31 Desember/December 31, 2020				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain (lanjutan)				
Pengukuran kembali bersih penyisihan	217.724	-	-	217.724
Aset keuangan baru yang diterbitkan atau dibeli	870.253	-	-	870.253
Aset keuangan yang dihentikan pengakuannya	(99.391)	-	-	(99.391)
Cadangan atas kerugian kredit ekspektasian akhir	1.596.496	-	-	1.596.496

Securities measured at fair value through other comprehensive income (continued)
Net remeasurement of allowance for losses
New financial asset issued or purchased
Derecognized financial assets
Allowance for ending expected credit losses

31 Desember/December 31, 2021				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada biaya perolehan diamortisasi				
Nilai tercatat awal	617.550.113	-	-	617.550.113
Pengukuran kembali bersih nilai tercatat	13.205.405	-	-	13.205.405
Aset keuangan baru yang diterbitkan atau dibeli	468.342.448	-	-	468.342.448
Aset keuangan yang dihentikan pengakuannya	(84.030.454)	-	-	(84.030.454)
Nilai tercatat akhir	1.015.067.512	-	-	1.015.067.512

Securities measured at amortized cost
Beginning carrying amount
Net remeasurement of carrying amount
New financial asset issued or purchased
Derecognized financial assets
Ending carrying amount

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7. EFEK-EFEK (lanjutan)

h) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

31 Desember/December 31, 2020				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada biaya perolehan diamortisasi				
Nilai tercatat awal	1.114.710.078	-	-	1.114.710.078
Pengukuran kembali bersih nilai tercatat	(751.132)	-	-	(751.132)
Aset keuangan baru yang diterbitkan atau dibeli	217.770.261	-	-	217.770.261
Aset keuangan yang dihentikan pengakuannya	(714.179.094)	-	-	(714.179.094)
Nilai tercatat akhir	617.550.113	-	-	617.550.113

31 Desember/December 31, 2021				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada biaya perolehan diamortisasi				
Saldo awal tahun	6.079.579	-	-	6.079.579
Pengukuran kembali bersih penyisihan	(619.294)	-	-	(619.294)
Aset keuangan baru yang diterbitkan atau dibeli	4.022.770	-	-	4.022.770
Aset keuangan yang dihentikan pengakuannya	(5.828.827)	-	-	(5.828.827)
Cadangan atas kerugian kredit ekspektasian akhir	3.654.228	-	-	3.654.228

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7. EFEK-EFEK (lanjutan)

h) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

	31 Desember/December 31, 2020			
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Efek-efek yang diukur pada biaya perolehan diamortisasi				
Saldo awal tahun	-	-	-	-
Dampak penerapan awal PSAK 71	2.434.753	-	-	2.434.753
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	2.434.753	-	-	2.434.753
Pengukuran kembali bersih penyisihan	2.890.055	-	-	2.890.055
Aset keuangan baru yang diterbitkan atau dibeli	1.884.779	-	-	1.884.779
Aset keuangan yang dihentikan pengakuannya	(1.130.008)	-	-	(1.130.008)
Cadangan atas kerugian kredit ekspektasian akhir	6.079.579	-	-	6.079.579

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai pada tanggal-tanggal 31 Desember 2021 dan 2020.

7. SECURITIES (continued)

h) Allowance for impairment losses (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

Securities measured at amortized cost
Balance at the beginning of the year
Impact on initial adoption of SFAS 71
Allowance for initial expected credit losses SFAS 71
Net remeasurement of allowance for losses
New financial asset issued or purchased
Derecognized financial assets
Allowance for ending expected credit losses

Management believes that the allowance for impairment losses is adequate as of December 31, 2021 and 2020.

The original financial statements included herein are in the Indonesian language.

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8. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal-tanggal 31 Desember 2021 dan 2020 terdiri dari:

8. SECURITIES PURCHASED UNDER AGREEMENT TO RESELL

Securities purchased under agreement to resell as of December 31, 2021 and 2020 consist of:

31 Desember/ December 31, 2021						
	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal beli/ Purchase date	Tanggal jual kembali/ Resell date	Nilai beli/ Purchase amount	Nilai Jual kembali/ Resell amount	Nilai tercatat/ Carrying value
Pihak ketiga/Third Parties						
Rupiah						
Bank Indonesia						
Obligasi Pemerintah/ Government bonds						
VR0047	3,50	27 Desember/ December 27, 2021	3 Januari/ January 3, 2022	67.985.631	68.031.899	68.018.680
VR0042	3,50	28 Desember/ December 28, 2021	4 Januari/ January 4, 2022	153.623.635	153.728.184	153.683.377
VR0058	3,50	31 Desember/ December 31, 2021	7 Januari/ January 7, 2022	428.634.084	428.925.793	428.675.756
Total				650.243.350	650.685.876	650.377.813
Cadangan kerugian penurunan nilai/ Allowance for impairment losses						-
Neto/Net						650.377.813

31 Desember/ December 31, 2020						
	Tingkat suku bunga per tahun/ Annual interest rate (%)	Tanggal beli/ Purchase date	Tanggal jual kembali/ Resell date	Nilai beli/ Purchase amount	Nilai Jual kembali/ Resell amount	Nilai tercatat/ Carrying value
Pihak ketiga/Third Parties						
Rupiah						
Bank Indonesia						
Obligasi Pemerintah/ Government bonds						
VR0035	3,75	28 Desember/ December 28, 2020	4 Januari/ January 4, 2021	1.337.043.120	1.338.018.047	1.337.600.222
VR0039	3,75	29 Desember/ December 29, 2020	5 Januari/ January 5, 2021	381.010.800	381.288.620	381.129.866
VR0043	3,75	30 Desember/ December 30, 2020	6 Januari/ January 6, 2021	1.328.725.440	1.329.694.303	1.329.002.257
Total				3.046.779.360	3.049.000.970	3.047.732.345
Cadangan kerugian penurunan nilai/ Allowance for impairment losses						-
Neto/Net						3.047.732.345

Bank melakukan penilaian cadangan kerugian penurunan nilai atas efek-efek yang dibeli dengan janji dijual kembali secara kolektif dengan mempertimbangkan adanya bukti obyektif penurunan nilai.

The Bank assessed allowance for impairment losses on securities purchased under agreement to resell collectively based on whether an objective evidence of impairment exists.

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**8. EFEK-EFEK YANG DIBELI DENGAN JANJI
DIJUAL KEMBALI (lanjutan)**

Tabel berikut menyajikan perubahan nilai tercatat
bruto berdasarkan kategori instrumen keuangan:

**8. SECURITIES PURCHASED UNDER AGREEMENT
TO RESELL (continued)**

The following table presents the changes in gross
carrying amount by financial instrument category:

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	3.047.732.345	-	-	3.047.732.345	Beginning carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	650.377.813	-	-	650.377.813	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(3.047.732.345)	-	-	(3.047.732.345)	Derecognized financial assets
Nilai tercatat akhir	650.377.813	-	-	650.377.813	Ending carrying amount
31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	2.268.980.518	-	-	2.268.980.518	Beginning carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	3.047.732.345	-	-	3.047.732.345	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(2.268.980.518)	-	-	(2.268.980.518)	Derecognized financial assets
Nilai tercatat akhir	3.047.732.345	-	-	3.047.732.345	Ending carrying amount

Manajemen berpendapat bahwa jumlah cadangan
kerugian penurunan nilai tidak diperlukan pada
tanggal-tanggal 31 Desember 2021 dan 2020,
karena manajemen berkeyakinan bahwa efek-efek
yang dibeli dengan janji dijual kembali dapat
dipulihkan secara penuh.

Management believes that the allowance for
impairment losses is not necessary as of
December 31, 2021 and 2020, because
management believes that securities purchased
under agreement to resell are fully recoverable.

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9. TAGIHAN LAINNYA

a) Berdasarkan mata uang dan jenis

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
Supply chain financing	-	23.745.047
Cadangan kerugian penurunan nilai	-	(37.118)
Neto	-	23.707.929

b) Berdasarkan sisa umur jatuh tempo

Klasifikasi jangka waktu tagihan lainnya berdasarkan sisa umur sampai dengan saat jatuh tempo adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
≤ 1 bulan	-	3.899.623
> 3 bulan - 1 tahun	-	19.845.424
Total	-	23.745.047
Cadangan kerugian penurunan nilai	-	(37.118)
Neto	-	23.707.929

c) Berdasarkan kolektibilitas

Pada tanggal-tanggal 31 Desember 2020, seluruh tagihan lainnya diklasifikasikan "lancar".

d) Suku bunga rata-rata

Tingkat suku bunga rata-rata per tahun untuk tagihan lainnya adalah 8,50% untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020.

e) Cadangan kerugian penurunan nilai

Bank melakukan penilaian cadangan kerugian penurunan nilai atas tagihan lainnya secara kolektif dengan mempertimbangkan adanya bukti obyektif penurunan nilai.

9. OTHER RECEIVABLES

a) By currency and type

Third parties
Rupiah
Supply chain financing
Allowance for impairment losses
Net

b) By remaining period to maturity

The classification of other receivables based on the remaining period to maturity are as follows:

Third parties
Rupiah
≤ 1 month
> 3 months - 1 year
Total
Allowance for impairment losses
Net

c) By collectibility

As of December 31, 2020, all other receivables were classified as "current".

d) Average interest rate

The annual average interest rates for other receivables are 8.50% for the year ended December 31, 2021 and 2020.

e) Allowance for impairment losses

The Bank assessed allowance for impairment losses on other receivables collectively based on whether an objective evidence of impairment exists.

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9. TAGIHAN LAINNYA (lanjutan)

e) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan:

31 Desember/December 31, 2021				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Nilai tercatat awal	23.745.047	-	-	23.745.047
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-
Aset keuangan yang dihentikan pengakuannya	(23.745.047)	-	-	(23.745.047)
Nilai tercatat akhir	-	-	-	-

*Beginning carrying amount
New financial asset issued
or purchased
Derecognized financial assets
Ending carrying amount*

31 Desember/December 31, 2020				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Nilai tercatat awal	-	-	-	-
Aset keuangan baru yang diterbitkan atau dibeli	23.745.047	-	-	23.745.047
Nilai tercatat akhir	23.745.047	-	-	23.745.047

*Beginning carrying amount
New financial asset issued
or purchased
Ending carrying amount*

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9. TAGIHAN LAINNYA (lanjutan)

e) Cadangan kerugian penurunan nilai (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	37.118	-	-	37.118	Balance at the beginning of the year
Pengukuran kembali bersih penyisihan	-	-	-	-	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(37.118)	-	-	(37.118)	Derecognized financial assets
Cadangan atas kerugian kredit ekspektasian akhir	-	-	-	-	Allowance for ending expected credit losses
31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	-	-	-	-	Balance at the beginning of the year
Dampak penerapan awal PSAK 71	-	-	-	-	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	-	-	-	-	Allowance for initial expected credit losses SFAS 71
Pengukuran kembali bersih penyisihan	37.118	-	-	37.118	Net remeasurement of allowance for losses
Cadangan atas kerugian kredit ekspektasian akhir	37.118	-	-	37.118	Allowance for ending expected credit losses

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai pada tanggal 31 Desember 2020.

9. OTHER RECEIVABLES (continued)

e) Allowance for impairment losses (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

Management believes that the allowance for impairment losses is adequate as of December 31, 2020.

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10. TAGIHAN DAN LIABILITAS AKSEPTASI

a) Berdasarkan mata uang dan jenis

	31 Desember/December 31, 2021	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Pihak ketiga		
Dolar Amerika Serikat		
Surat Kredit Berdokumen	6.494.403	92.561.485
Dalam Negeri		
Cadangan kerugian penurunan nilai		(112.202)
Neto		92.449.283

Total liabilitas akseptasi adalah sebesar jumlah tagihan akseptasi kepada nasabah.

b) Berdasarkan kolektibilitas

Pada tanggal 31 Desember 2021, seluruh tagihan akseptasi diklasifikasikan "lancar".

c) Berdasarkan sisa umur jatuh tempo

Klasifikasi jangka waktu tagihan dan liabilitas akseptasi berdasarkan sisa umur sampai dengan saat jatuh tempo adalah sebagai berikut:

	31 Desember/ December 31, 2021
≤ 1 bulan	30.342.254
> 1 bulan - 3 bulan	37.039.244
> 3 bulan - 1 tahun	25.179.987
Total	92.561.485
Cadangan kerugian penurunan nilai	(112.202)
Neto	92.449.283

d) Cadangan kerugian penurunan nilai

Bank melakukan penilaian cadangan kerugian penurunan nilai atas tagihan akseptasi secara individual dengan adanya bukti obyektif penurunan nilai.

10. ACCEPTANCES RECEIVABLE AND PAYABLE

a) By currency and type

	31 Desember/December 31, 2020	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Third parties		
United States Dollar		
Domestic Documentary Letter of Credit	-	-
Allowance for impairment losses	-	-
Net	-	-

Total acceptances payable represent the same amount as acceptances receivable from customers.

b) By collectability

As of December 31, 2021, all acceptances receivable were classified as "current".

c) By remaining period to maturity

The classification of acceptances receivable and payable based on the remaining period to maturity follows:

	31 Desember/ December 31, 2020
≤ 1 month	-
> 1 month - 3 months	-
> 3 months - 1 year	-
Total	-
Allowance for impairment losses	-
Net	-

d) Allowance for impairment losses

The Bank individually assess allowance for impairment losses on acceptances receivable with objectives evidence of impairment.

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10. TAGIHAN DAN LIABILITAS AKSEPTASI
(lanjutan)

- d) Cadangan kerugian penurunan nilai
(lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan:

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	-	-	-	-	Beginning carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	92.561.485	-	-	92.561.485	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	-	-	-	-	Derecognized financial assets
Nilai tercatat akhir	92.561.485	-	-	92.561.485	Ending carrying amount
31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	-	-	-	-	Balance at the beginning of the year
Pengukuran kembali bersih penyisihan	-	-	-	-	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	112.202	-	-	112.202	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	-	-	-	-	Derecognized financial assets
Cadangan atas kerugian kredit ekspektasian akhir	112.202	-	-	112.202	Allowance for ending expected credit losses

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai pada tanggal 31 Desember 2021.

10. ACCEPTANCES RECEIVABLE AND PAYABLE
(continued)

- d) Allowance for impairment losses (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category:

Management believes that the allowance for impairment losses is adequate as of December 31, 2021.

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11. KREDIT YANG DIBERIKAN

a) Berdasarkan mata uang dan jenis

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
Modal kerja	2.988.086.753	5.620.108.527
Investasi	2.790.896.451	5.541.054.594
Program	1.774.327.142	2.626.437.737
Konsumsi	954.565.234	1.154.997.367
Sindikasi	177.473.911	485.119.254
	<u>8.685.349.491</u>	<u>15.427.717.479</u>
Dolar Amerika Serikat		
Sindikasi	507.549.351	331.006.532
Investasi	499.980.972	568.050.387
Modal kerja	206.849.717	686.640.333
	<u>1.214.380.040</u>	<u>1.585.697.252</u>
	<u>9.899.729.531</u>	<u>17.013.414.731</u>
Pihak berelasi (Catatan 35)		
Rupiah		
Sindikasi	645.037.559	1.446.880.122
Modal kerja	612.652.912	562.191.335
Investasi	447.769.707	466.130.674
Konsumsi	3.137.689	3.316.930
	<u>1.708.597.867</u>	<u>2.478.519.061</u>
Total	11.608.327.398	19.491.933.792
Cadangan kerugian penurunan nilai	(1.875.401.843)	(1.006.365.249)
Neto	<u>9.732.925.555</u>	<u>18.485.568.543</u>

Jumlah nosional atas kredit yang diberikan dalam mata uang Dolar Amerika Serikat pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar ASD85.204.704 dan ASD84.814.692 (nilai penuh).

11. LOANS

a) By currency and type

Third parties	
Rupiah	
Working capital	
Investment	
Programs	
Consumer	
Syndicated	
United States Dollar	
Syndicated	
Investment	
Working capital	
Related parties (Note 35)	
Rupiah	
Syndicated	
Working capital	
Investment	
Consumer	
Total	
Allowance for impairment losses	
Net	

The notional amount of loans which are denominated in United States Dollar as of December 31, 2021 and 2020 amounting to USD85,204,704 and USD84,814,692 (full amount), respectively.

b) Berdasarkan sektor ekonomi

b) By economic sector

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
Pertanian	4.563.809.519	7.980.684.828
Perdagangan	1.400.681.749	2.305.525.035
Perindustrian	720.343.535	2.402.834.077
Konstruksi	434.482.598	517.591.880
Jasa dunia usaha	231.189.953	542.411.080
Pengangkutan	217.786.721	285.366.829
Jasa pelayanan sosial	126.167.221	145.230.305
Listrik, gas dan air	24.141.149	78.230.346
Pertambangan	11.747.207	14.845.733
Lain-lain	954.999.839	1.154.997.366
	<u>8.685.349.491</u>	<u>15.427.717.479</u>

Third parties	
Rupiah	
Agriculture	
Trading	
Manufacturing	
Construction	
Business services	
Transportation	
Social services	
Electricity, gas and water	
Mining	
Others	

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11. KREDIT YANG DIBERIKAN (lanjutan)

b) Berdasarkan sektor ekonomi (lanjutan)

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga (lanjutan)		
Dolar Amerika Serikat		
Listrik, gas dan air	642.160.335	538.456.583
Perindustrian	386.937.017	422.015.551
Pertanian	156.777.688	470.675.118
Pengangkutan	28.505.000	28.100.000
Perdagangan	-	126.450.000
	1.214.380.040	1.585.697.252
	9.899.729.531	17.013.414.731
Pihak berelasi (Catatan 35)		
Rupiah		
Konstruksi	884.938.218	1.646.857.327
Pertanian	669.846.258	639.651.707
Jasa dunia usaha	88.713.448	88.727.853
Listrik, gas dan air	59.962.254	99.965.244
Perdagangan	2.000.000	-
Lain-lain	3.137.689	3.316.930
	1.708.597.867	2.478.519.061
Total	11.608.327.398	19.491.933.792
Cadangan kerugian penurunan nilai	(1.875.401.843)	(1.006.365.249)
Neto	9.732.925.555	18.485.568.543

c) Berdasarkan sisa umur jatuh tempo

Klasifikasi jangka waktu kredit yang diberikan berdasarkan sisa umur sampai dengan jatuh temponya adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
≤ 1 bulan	259.478.690	157.258.548
> 1 bulan - 3 bulan	776.627.438	1.109.594.153
> 3 bulan - 1 tahun	1.405.469.968	2.875.170.511
> 1 tahun - 2 tahun	423.753.415	501.566.979
> 2 tahun - 5 tahun	1.456.488.227	2.450.328.172
> 5 tahun	4.363.531.753	8.333.799.116
	8.685.349.491	15.427.717.479
Dolar Amerika Serikat		
> 1 bulan - 3 bulan	28.505.000	44.679.000
> 3 bulan - 1 tahun	21.567.029	452.286.215
> 2 tahun - 5 tahun	291.388.672	370.705.688
> 5 tahun	872.919.339	718.026.349
	1.214.380.040	1.585.697.252
	9.899.729.531	17.013.414.731

11. LOANS (continued)

b) By economic sector (continued)

Third parties (continued)
United States Dollar
Electricity, gas and water
Manufacturing
Agriculture
Transportation
Trading

Related parties (Note 35)
Rupiah
Construction
Agriculture
Business services
Electricity, gas and water
Commerce
Others

Total
Allowance for impairment losses

Net

c) By remaining period to maturity

The classification of loans based on the remaining period to maturity are as follows:

Third parties
Rupiah
≤ 1 month
> 1 month - 3 months
> 3 months - 1 year
> 1 year - 2 years
> 2 years - 5 years
> 5 years

United States Dollar
> 1 month - 3 months
> 3 months - 1 year
> 2 years - 5 years
> 5 years

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11. KREDIT YANG DIBERIKAN (lanjutan)

c) Berdasarkan sisa umur jatuh tempo (lanjutan)

Klasifikasi jangka waktu kredit yang diberikan berdasarkan sisa umur sampai dengan jatuh temponya adalah sebagai berikut (lanjutan):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak berelasi (Catatan 35)		
Rupiah		
≤ 1 bulan	-	125.016.375
> 1 bulan - 3 bulan	2.001.927	-
> 3 bulan - 1 tahun	195.301.306	238.115.277
> 1 tahun - 2 tahun	59.962.255	187.847.656
> 2 tahun - 5 tahun	154.850.171	278.592.658
> 5 tahun	1.296.482.208	1.648.947.095
	<u>1.708.597.867</u>	<u>2.478.519.061</u>
Total	11.608.327.398	19.491.933.792
Cadangan kerugian penurunan nilai	(1.875.401.843)	(1.006.365.249)
Neto	9.732.925.555	18.485.568.543

11. LOANS (continued)

c) By remaining period to maturity (continued)

The classification of loans based on the remaining period to maturity are as follows (continued):

Related parties (Note 35)	
Rupiah	
≤ 1 month	
> 1 month - 3 months	
> 6 months - 1 year	
> 1 year - 2 years	
> 2 years - 5 years	
> 5 years	
Total	
Allowance for impairment losses	
Net	

d) Berdasarkan kolektibilitas

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Individual	3.954.908.906	4.060.161.691
Kolektif		
Lancar	7.336.853.806	15.217.301.734
Dalam perhatian khusus	275.457.170	105.526.031
Kurang lancar	30.435.677	11.618.112
Diragukan	9.809.368	4.236.037
Macet	862.471	93.090.187
Total	<u>11.608.327.398</u>	<u>19.491.933.792</u>
Cadangan kerugian penurunan nilai		
Individual	(1.661.593.152)	(646.700.596)
Kolektif	(213.808.691)	(359.664.653)
Neto	9.732.925.555	18.485.568.543

d) By collectibility

Individual	
Collective	
Current	
Special mention	
Substandard	
Doubtful	
Loss	
Total	
Allowance for impairment losses	
Individual	
Collective	
Net	

e) Berdasarkan segmen operasi

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
Menengah	4.139.460.184	9.444.418.765
Ritel	3.591.324.073	4.828.323.066
Konsumer	954.565.234	1.154.975.648
	<u>8.685.349.491</u>	<u>15.427.717.479</u>
Dolar Amerika Serikat		
Menengah	1.214.380.040	1.585.697.252
	<u>9.899.729.531</u>	<u>17.013.414.731</u>

e) By operating segment

Third parties	
Rupiah	
Middle	
Retail	
Consumer	
United States Dollar	
Middle	

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11. KREDIT YANG DIBERIKAN (lanjutan)

e) Berdasarkan segmen operasi (lanjutan)

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak berelasi (Catatan 35)		
Rupiah		
Menengah	1.703.460.178	2.475.202.131
Konsumer	3.137.689	3.316.930
Ritel	2.000.000	-
	<u>1.708.597.867</u>	<u>2.478.519.061</u>
Total	11.608.327.398	19.491.933.792
Cadangan kerugian penurunan nilai	(1.875.401.843)	(1.006.365.249)
Neto	9.732.925.555	18.485.568.543

Related parties (Note 35)	
Rupiah	
Middle	
Consumer	
Retail	
Total	
Allowance for impairment losses	
Net	

f) Informasi penting lainnya

1) Tingkat suku bunga rata-rata per tahun untuk kredit yang diberikan:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah		
Suku bunga kontraktual	10,56%	10,80%
Suku bunga efektif	10,82%	11,23%
Dolar Amerika Serikat		
Suku bunga kontraktual	4,72%	5,19%
Suku bunga efektif	4,69%	5,19%

- Kredit yang diberikan pada umumnya dijamin dengan agunan yang diikat dengan hak tanggungan, surat kuasa untuk menjual, giro, tabungan, deposito atau jaminan lain yang umumnya diterima oleh perbankan (Catatan 17, 18 dan 19).
- Kredit modal kerja dan investasi diberikan kepada debitur untuk memenuhi kebutuhan modal kerja dan barang-barang modalnya.
- Kredit konsumsi terdiri dari kredit pemilikan rumah, kredit kendaraan bermotor dan kredit perorangan lainnya.
- Kredit program merupakan kredit yang disalurkan Bank berdasarkan arahan dari Pemerintah dalam rangka mendukung pembangunan di Indonesia khususnya pengembangan usaha kecil, menengah dan koperasi.

11. LOANS (continued)

e) By operating segment (continued)

f) Other significant information

1) The average annual interest rates for loans:

- The loans are generally collateralized by registered mortgages, powers of attorneys to sell, demand deposits, saving deposits, time deposits or by other guarantees generally accepted by banks (Notes 17, 18 and 19).
- Working capital and investment loans consist of loans to customers for working capital requirements and capital goods.
- Consumer loans consist of housing, motor vehicles and other personal loans.
- Program loans consist of loan facilities channeled through the Bank based on the guidelines from the Government to support the development of Indonesia's small scale industry, middle and cooperative units.

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

- 6) Kredit sindikasi merupakan kredit yang diberikan kepada debitur di bawah perjanjian pembiayaan bersama dengan bank lain. Keikutsertaan Bank sebagai pemimpin sindikasi sebesar 40,50% pada tanggal 31 Desember 2020.

Keikutsertaan Bank sebagai anggota sindikasi sebesar 9,48% dan 29,86% masing-masing pada tanggal 31 Desember 2021 dan 2020.

- 7) Jumlah kredit yang diberikan yang telah direstrukturisasi oleh Bank, sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 40/POJK.03/2019 tanggal 19 Desember 2019 tentang Penilaian Kualitas Aset Bank Umum, sampai dengan tanggal 31 Desember 2021 dan 2020, yang dilaporkan kepada Otoritas Jasa Keuangan adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Modal Kerja		
Lancar	519.701.108	227.929.643
Dalam perhatian khusus	88.639.722	332.022.986
Kurang lancar	6.551.562	75.915.651
Diragukan	367.043	-
Macet	-	246.552.252
	615.259.435	882.420.532
Investasi		
Lancar	320.543.245	160.379.925
Dalam perhatian khusus	178.510.108	717.157.981
Kurang lancar	-	768.942
Diragukan	-	31.564.840
Macet	-	285.713.382
	499.053.353	1.195.585.070
Program		
Lancar	390.728.866	372.462.235
Dalam perhatian khusus	34.575.129	35.000.000
Diragukan	35.689	-
Macet	261.310	245.257.010
	425.600.994	652.719.245

11. LOANS (continued)

f) Other significant information (continued)

- 6) Syndicated loans consist of loans provided to customers under syndication agreements with other bank. The Bank's participation as a leader in the syndicated loans was 40.50% as of December 31, 2020.

The Bank's participation as a participant in the syndicated loans was 9.48% and 29.86% as of December 31, 2021 and 2020, respectively.

- 7) Loans that have been restructured by the Bank, in accordance with Financial Service Authority Regulations (POJK) No. 40/POJK.03/2019 dated December 19, 2019 concerning Assessment of Commercial Bank Asset Quality, until December 31, 2021 and 2020, respectively, which reported to Otoritas Jasa Keuangan are as follows:

Working capital
Current
Special mention
Substandard
Doubtful
Loss
Investment
Current
Special mention
Substandard
Doubtful
Loss
Program
Current
Special mention
Doubtful
Loss

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Konsumsi		
Lancar	14.106.706	16.629.828
Dalam perhatian khusus	4.104.019	5.956.600
Kurang lancar	663.022	573.335
Macet	-	2.639.047
	18.873.747	25.798.810
Sindikasi		
Lancar	-	31.810.089
Dalam perhatian khusus	-	96.761.912
	-	128.572.001
Total	1.558.787.529	2.885.095.658

Skema restrukturisasi tersebut dilakukan dengan perpanjangan jangka waktu dan penurunan suku bunga kredit.

- 8) Jumlah kredit yang diberikan yang telah direstrukturisasi oleh Bank akibat pandemi Covid-19, sesuai dengan POJK No. 11/POJK.03/2020 tanggal 16 Maret 2020 tentang Stimulus Perekonomian Nasional Sebagai Kebijakan *Countercyclical* Dampak Penyebaran *Coronavirus Disease 2019* dan POJK No. 48/POJK.03/2020 tanggal 1 Desember 2020 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2020 tentang Stimulus Perekonomian Nasional Sebagai Kebijakan *Countercyclical* Dampak Penyebaran *Corona Virus Disease 2019*, sampai dengan tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebesar Rp3.511.344.478 dan Rp4.024.517.915. Skema restrukturisasi tersebut dilakukan dengan perpanjangan jangka waktu, penurunan suku bunga dan penundaan pembayaran pokok dan/atau bunga.

- 9) Kredit yang diberikan Bank kepada pihak berelasi disajikan pada Catatan 35.

11. LOANS (continued)

f) Other significant information (continued)

Consumer
Current
Special mention
Substandard
Loss

Syndicated
Current
Special mention

Total

The restructuring scheme involves extension of loan maturity date and reduction of interest rate.

- 8) Loans that have been restructured by the Bank, in accordance with Financial Service Authority Regulation (POJK) No. 11/POJK.03/2020 dated March 16, 2020 concerning National Economic Stimulus as Countercyclical Policy on Coronavirus Disease 2019 Spreading Impact dan POJK No. 48/POJK.03/2020 dated December 1, 2020 concerning Changes to Financial Service Authority Regulation No. 11/POJK.03/2020 concerning National Economic Stimulus as Countercyclical Policy on Corona Virus Disease 2019 Spreading Impact, until December 31, 2021 and 2020 are amounting to Rp3,511,344,478 and Rp4,024,517,915, respectively. The restructuring scheme involves extension of loan maturity date, reduction of interest rate and deferment of principal and/or interest payment.

- 9) The loans granted by the Bank to related parties is presented in Note 35.

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

- 10) Dalam laporan Batas Maksimum Pemberian Kredit (BMPK) per tanggal 31 Desember 2021 kepada Bank Indonesia/Otoritas Jasa Keuangan, Bank memiliki debitur yang melampaui ketentuan BMPK sebesar 2,70%.

Berdasarkan surat Bank No. B.42/Dir.01.04/MNA/01/2022 tanggal 11 Januari 2022 tentang Penyampaian Laporan *Action Plan* Penyelesaian Debitur Pelampauan BMPK Bulan Desember 2021 kepada Otoritas Jasa Keuangan (OJK), Bank telah menyampaikan rencana action plan berupa *revamp* dan pelunasan sebagian atau seluruh kredit debitur dengan target penyelesaian pada bulan Maret 2022.

Berdasarkan surat Bank No. B.126/Dir.01.04/MNA/02/2022 tanggal 21 Februari 2022 tentang Permohonan Perpanjangan Jangka Waktu Penyelesaian Rencana Tindak (Action Plan) Penyelesaian Debitur Kelompok Peminjam Pelampauan BMPK kepada OJK, Bank telah mengajukan perpanjangan jangka waktu penyelesaian kepada OJK sampai dengan bulan Desember 2022 dan telah mendapatkan persetujuan dari OJK sesuai dengan surat OJK No. S-37/PB.313/2022 tanggal 16 Maret 2022.

Sedangkan, dalam laporan Batas Maksimum Pemberian Kredit (BMPK) per tanggal 31 Desember 2020 kepada Bank Indonesia/Otoritas Jasa Keuangan, Bank tidak memiliki debitur, baik pihak terkait maupun pihak tidak terkait yang melanggar atau melampaui ketentuan BMPK.

- 11) Rincian kredit kolektif bermasalah (kolektibilitas 3, 4 dan 5) dan total kredit individual, serta total cadangan kerugian penurunan nilai, berdasarkan sektor ekonomi adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pertanian	2.952.579.182	3.410.414.777
Konstruksi	511.689.152	150.313.106
Perindustrian	369.118.968	102.479.923

Agriculture
 Constructions
 Manufacturing

11. LOANS (continued)

f) Other significant information (continued)

- 10) In its report on Legal Lending Limit (LLL) to Bank Indonesia/Otoritas Jasa Keuangan as of December 31, 2021, the Bank indicated that there are debtor that exceeded the LLL amounted to 2.70%.

Based on the Bank's letter No. B.42/Dir.01.04/MNA/01/2022 dated January 11, 2022, concerning the Submission of Action Plan Report for Settlement of Debtors Exceeding LLL for December 2021 to the Financial Services Authority (OJK), the Bank has submitted an action plan in the form of revamp and repayment of part or all of debtor's outstanding loans with target completion in March 2022.

Based on the Bank's letter No. B.126/Dir.01.04/MNA/02/2022 dated February 21, 2022, concerning the Application for Extending the Completion Period of the Action Plan for Settlement of Exceeded LLL Group Debtors to OJK, the Bank has submitted an extension of the settlement period to OJK until December 2022 and has obtained approval from OJK in accordance with OJK letter No. S-37/PB.313/2022 dated March 16, 2022.

Whereas, in its report on Legal Lending Limit (LLL) to Bank Indonesia/Otoritas Jasa Keuangan as of December 31, 2020, the Bank indicated that there is no debtor either related party or third party who has not complied with or exceeded the LLL.

- 11) The details of non-performing collective loans (with collectibility 3, 4 and 5) and total individual loans, with total allowance for impairment losses by economic sector are as follows:

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

- 11) Rincian kredit kolektif bermasalah (kolektibilitas 3, 4 dan 5) dan total kredit individual, serta total cadangan kerugian penurunan nilai, berdasarkan sektor ekonomi adalah sebagai berikut (lanjutan):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Jasa dunia usaha	57.996.657	156.912.082
Pengangkutan	54.344.908	10.607.354
Perdagangan	43.464.877	234.788.312
Jasa pelayanan sosial	537.766	1.023.783
Listrik, gas dan air	56.742	51.588.708
Pertambangan	-	277.053
Lain-lain	6.228.170	50.700.929
Total	3.996.016.422	4.169.106.027
Cadangan kerugian penurunan nilai	(1.697.773.362)	(737.844.163)
Neto	2.298.243.060	3.431.261.864

12) Rasio-rasio

- a. Rasio kredit bermasalah *Non Performing Loan* (NPL) Bank berdasarkan Peraturan Bank Indonesia/Otoritas Jasa Keuangan adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Total kredit bermasalah (NPL)	461.598.358	968.070.358
Total kredit yang diberikan	11.608.327.398	19.491.933.792
% kredit bermasalah (NPL-bruto)	3,98%	4,97%
% kredit bermasalah (NPL-neto)	0,04%	2,73%

- b. Rasio kredit usaha kecil terhadap jumlah kredit yang diberikan Bank adalah sebesar 4,78% dan 12,24% masing-masing pada tanggal 31 Desember 2021 dan 2020.

11. LOANS (continued)

f) Other significant information (continued)

- 11) The details of non-performing collective loans (with collectibility 3, 4 and 5) and total individual loans, with total allowance for impairment losses by economic sector are as follows (continued):

<i>Business services</i>
<i>Transportation</i>
<i>Trading</i>
<i>Social services</i>
<i>Electricity, gas and water</i>
<i>Mining</i>
<i>Others</i>
Total
<i>Allowance for impairment losses</i>
Net

12) Ratios

- a. The ratio of non performing loans (NPL) of the Bank, based on Bank Indonesia/Otoritas Jasa Keuangan regulation are as follows:

<i>Total non-performing loans (NPL)</i>
<i>Total loans</i>
<i>Non-performing loans (NPL- gross) %</i>
<i>Non-performing loans (NPL-net) %</i>

- b. The ratio of small business loans to total loans is 4.78% and 12.24% as of December 31, 2021 and 2020, respectively.

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan:

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	14.745.361.476	3.778.501.958	968.070.358	19.491.933.792	Beginning carrying amount
Pengalihan ke					Transfer to
Stage 1	15.428.894	(14.652.316)	(776.578)	-	Stage 1
Stage 2	(549.875.952)	559.887.165	(10.011.213)	-	Stage 2
Stage 3	(122.016.808)	(8.310.890)	130.327.698	-	Stage 3
Pengukuran kembali bersih nilai tercatat	(441.777.168)	(12.559.136)	884.307	(453.451.997)	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	688.367.732	80.646.369	1.020.523	770.034.624	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(5.153.491.728)	(2.430.435.662)	2.321.251.830	(5.262.675.560)	Derecognized financial assets
Penghapusbukuan	-	-	(3.075.688.435)	(3.075.688.435)	Write-off
Penyerahan kembali aset keuangan yang telah dihapuskan	-	-	126.112.211	126.112.211	Recoveries of written-off financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	11.657.763	-	405.000	12.062.763	Changes in foreign exchange models or parameters and other changes
Nilai tercatat akhir	9.193.654.210	1.953.077.488	461.595.700	11.608.327.398	Ending carrying amount

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Nilai tercatat awal	15.042.938.989	2.842.819.829	1.480.486.670	19.366.245.488	Beginning carrying amount
Pengalihan ke					Transfer to
Stage 1	141.206.526	(139.870.695)	(1.335.831)	-	Stage 1
Stage 2	(1.167.798.684)	1.187.518.437	(19.719.753)	-	Stage 2
Stage 3	(14.992.728)	(64.696.194)	79.688.922	-	Stage 3

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

	31 Desember/December 31, 2020			
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total
Pengukuran kembali bersih nilai tercatat	158.327.557	4.353.998	(2.075.772)	160.605.783
Aset keuangan baru yang diterbitkan atau dibeli	2.939.217.930	415.744.119	20.416.737	3.375.378.786
Aset keuangan yang dihentikan pengakuannya	(2.350.938.031)	(433.307.136)	(49.260.747)	(2.833.505.914)
Penghapusbukuan	(11.447.710)	(34.060.400)	(540.110.542)	(585.618.652)
Perubahan model atau parameter valuta asing dan perubahan lain	8.847.627	-	(19.326)	8.828.301
Nilai tercatat akhir	14.745.361.476	3.778.501.958	968.070.358	19.491.933.792

11. LOANS (continued)

f) Other significant information (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

	31 Desember/December 31, 2021				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	216.341.529	354.163.796	435.859.925	1.006.365.250	Balance at the beginning of the year
Pengalihan ke					Transfer to
Stage 1	4.963.139	(4.291.259)	(671.880)	-	Stage 1
Stage 2	(13.094.141)	21.720.187	(8.626.046)	-	Stage 2
Stage 3	(2.220.841)	(1.264.798)	3.485.639	-	Stage 3
Pengukuran kembali bersih penyisihan	8.378.642	56.979.966	114.576.814	179.935.422	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	13.840.479	3.401.224	878.009	18.119.712	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	591.508.858	168.237.481	2.913.678.991	3.673.425.330	Derecognized financial assets
Penghapusbukuan	-	-	(3.075.688.435)	(3.075.688.435)	Write-off
Perubahan model atau parameter valuta asing dan perubahan lain	66.542	-	73.178.022	73.244.564	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	819.784.207	598.946.597	456.671.039	1.875.401.843	Allowance for ending expected credit losses

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

	31 Desember/December 31, 2020				
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Saldo awal tahun	122.248.310	170.365.220	541.106.458	833.719.988	Balance at the beginning of the year
Dampak penerapan awal PSAK 71	47.975.629	76.310.180	286.207.551	410.493.360	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	170.223.939	246.675.400	827.314.009	1.244.213.348	Allowance for initial expected credit losses SFAS 71
Pengalihan ke					Transfer to
Stage 1	6.487.315	(6.408.899)	(78.416)	-	Stage 1
Stage 2	(81.679.905)	85.483.654	(3.803.749)	-	Stage 2
Stage 3	(12.822.659)	(62.346.011)	75.168.670	-	Stage 3
Pengukuran kembali bersih penyisihan	117.129.609	91.938.287	75.469.323	284.537.219	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	41.088.121	65.945.828	11.007.438	118.041.387	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(13.157.011)	(33.798.237)	(38.488.094)	(85.443.342)	Derecognized financial assets
Penghapusbukuan	(11.447.710)	(34.060.400)	(540.110.542)	(585.618.652)	Write-off
Penerimaan kembali aset keuangan yang telah dihapusbukukan	-	734.173	29.361.959	30.096.132	Recoveries of written-off financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	519.830	-	19.327	539.157	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	216.341.529	354.163.795	435.859.925	1.006.365.249	Allowance for ending expected credit losses

Jumlah minimum Penyisihan Penilaian Kualitas Aset (PPKA) kredit yang diberikan, yang wajib dibentuk sesuai dengan ketentuan Bank Indonesia/Otoritas Jasa Keuangan adalah sebesar Rp273.229.215 dan Rp950.823.002 masing-masing pada tanggal 31 Desember 2021 dan 2020.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai yang dibentuk pada tanggal-tanggal 31 Desember 2021 dan 2020 telah memadai.

11. LOANS (continued)

f) Other significant information (continued)

The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

The minimum Allowance for Asset Quality Assessment on loans which must be provided based on Bank Indonesia/Otoritas Jasa Keuangan regulation amounting to Rp273,229,215 and Rp950,823,002 as of December 31, 2021 and 2020, respectively.

Management believes that the allowance for impairment losses provided as of December 31, 2021 and 2020 are adequate.

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11. KREDIT YANG DIBERIKAN (lanjutan)

f) Informasi penting lainnya (lanjutan)

Pada tanggal-tanggal 31 Desember 2021 dan 2020, tidak terdapat kredit yang diberikan yang dialihkan dan/atau digunakan sebagai jaminan atas utang.

11. LOANS (continued)

f) Other significant information (continued)

As of December 31, 2021 and 2020, there are no loans that were transferred and/or used as collateral for debts.

12. PENYERTAAN SAHAM

Rincian penyertaan saham adalah sebagai berikut:

12. INVESTMENT IN SHARES OF STOCKS

The details of investment in shares of stocks are as follows:

31 Desember/December 31, 2021				
Nama Perusahaan	Jenis usaha/ Business type	Pemilikan/ Ownership	Nilai Tercatat/ Carrying amount	Company Name
PT BPR Cinta Manis Agroloka	Bank	1,75%	35.010	PT BPR Cinta Manis Agroloka
PT BPR Bungamayang Agroloka	Bank	2,25%	22.500	PT BPR Bungamayang Agroloka
PT Aplikanusa Lintasarta	Non-bank	0,23%	20.000	PT Aplikanusa Lintasarta
Total			77.510	Total

31 Desember/December 31, 2020				
Nama Perusahaan	Jenis usaha/ Business type	Pemilikan/ Ownership	Nilai Tercatat/ Carrying amount	Company Name
PT BPR Toelongredjo Dasa Nusantara	Bank	1,50%	76.830	PT BPR Toelongredjo Dasa Nusantara
PT BPR Tjoekir Dasa Nusantara	Bank	3,00%	76.818	PT BPR Tjoekir Dasa Nusantara
PT BPR Toelangan Dasa Nusantara	Bank	1,50%	66.500	PT BPR Toelangan Dasa Nusantara
PT BPR Cinta Manis Agroloka	Bank	1,75%	35.010	PT BPR Cinta Manis Agroloka
PT BPR Bungamayang Agroloka	Bank	1,13%	22.500	PT BPR Bungamayang Agroloka
PT Aplikanusa Lintasarta	Non-bank	0,23%	20.000	PT Aplikanusa Lintasarta
Total			297.658	Total

Untuk tahun yang berakhir pada tanggal 31 Desember 2021, Bank telah menerima dividen tunai dari PT Aplikanusa Lintasarta, PT BPR Cintamanis Agroloka, dan PT BPR Bungamayang Agroloka masing-masing sebesar Rp28.786, Rp5.964 dan Rp4.295, sedangkan untuk tahun yang berakhir pada tanggal 31 Desember 2020, Bank telah menerima dividen tunai dari PT Aplikanusa Lintasarta, PT BPR Cintamanis Agroloka, dan PT BPR Bungamayang Agroloka masing-masing sebesar Rp16.163, Rp6.364 dan Rp5.427.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, seluruh penyertaan saham diklasifikasikan "lancar".

Untuk tahun yang berakhir pada tanggal 31 Desember 2021, Bank telah melepas penyertaan saham pada PT BPR Toelongredjo Dasa Nusantara, PT BPR Tjoekir Dasa Nusantara dan PT BPR Toelangan Dasa Nusantara.

For the year ended December 31, 2021, the Bank received cash dividend from PT Aplikanusa Lintasarta, PT BPR Cintamanis Agroloka dan PT BPR Bungamayang Agroloka amounted Rp28,786, Rp5,964, dan Rp4,295, whereas for the year ended December 31, 2020, the Bank received cash dividend from PT Aplikanusa Lintasarta, PT BPR Cintamanis Agroloka dan PT BPR Bungamayang Agroloka amounted to Rp16,163, Rp6,364, dan Rp5,427.

As of December 31, 2021 and 2020, all investment in shares of stocks were classified as "current".

For the year ended December 31, 2021, the Bank has divested its investment in shares of stocks in PT BPR Toelongredjo Dasa Nusantara, PT BPR Tjoekir Dasa Nusantara and PT BPR Toelangan Dasa Nusantara.

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12. PENYERTAAN SAHAM (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai tidak diperlukan pada tanggal-tanggal 31 Desember 2021 dan 2020.

12. INVESTMENT IN SHARES OF STOCKS (continued)

Management believes that the allowance for impairment losses is not necessary as of December 31, 2021 and 2020.

13. ASET TETAP, ASET HAK GUNA DAN ASET TAK BERWUJUD

Aset tetap dan aset hak guna

Aset tetap terdiri atas:

13. PREMISES AND EQUIPMENTS, RIGHT-OF-USE ASSETS AND INTANGIBLE ASSETS

Premises and equipments and right-of-use assets

Premises and equipments consist of:

31 Desember/December 31, 2021

	Saldo Awal/ Beginning Balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassifications	Saldo Akhir/ Ending Balance	
Biaya perolehan						Acquisition cost
Hak atas tanah	154.559.803	-	-	-	154.559.803	Landrights
Bangunan	98.391.665	2.430.904	-	-	100.822.569	Buildings
Renovasi bangunan sewa	19.512.948	1.655.215	3.165.791	38.641	18.041.013	Office leasehold improvements
Kendaraan	20.237.934	363.080	1.119.991	-	19.481.023	Vehicles
Perlengkapan kantor	69.366.239	23.060.484	4.512.601	161.897	88.076.019	Office equipment
Aset dalam penyelesaian	200.539	7.980.555	-	(200.539)	7.980.555	Construction in progress
	362.269.128	35.490.237	8.798.383	-	388.960.982	
Aset hak guna	25.762.014	3.858.215	12.541.295	-	17.078.934	Right-of-use assets
	388.031.142	39.348.452	21.339.678	-	406.039.916	
Akumulasi penyusutan						Accumulated depreciation
Bangunan	20.506.764	3.893.746	-	-	24.400.510	Buildings
Renovasi bangunan sewa	16.774.917	950.818	3.144.961	-	14.580.774	Office leasehold improvements
Kendaraan	17.898.675	1.129.645	990.125	-	18.038.195	Vehicles
Perlengkapan kantor	55.581.817	5.813.392	4.391.299	-	57.003.910	Office equipment
	110.762.173	11.781.896	8.520.680	-	114.023.389	
Aset hak guna	8.145.275	12.042.656	12.541.295	-	7.646.636	Right-of-use assets
	118.907.448	23.830.256	21.061.975	-	121.670.024	
Nilai buku neto	269.123.694				284.369.892	Net book value

31 Desember/December 31, 2020

	Saldo Awal/ Beginning Balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassifications	Saldo Akhir/ Ending Balance	
Biaya perolehan						Acquisition cost
Hak atas tanah	154.559.803	-	-	-	154.559.803	Landrights
Bangunan	96.114.322	624.280	-	1.653.063	98.391.665	Buildings
Renovasi bangunan sewa	17.688.524	1.260.854	-	563.570	19.512.948	Office leasehold improvements
Kendaraan	19.872.984	364.950	-	-	20.237.934	Vehicles
Perlengkapan kantor	64.228.233	4.728.149	798.509	1.208.366	69.366.239	Office equipment
Aset dalam penyelesaian	3.424.999	200.539	-	(3.424.999)	200.539	Construction in progress
	355.888.865	7.178.772	798.509	-	362.269.128	
Aset hak guna	14.959.964	10.802.050	-	-	25.762.014	Right-of-use assets
	370.848.829	17.980.822	798.509	-	388.031.142	

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13. ASET TETAP, ASET HAK GUNA DAN ASET TAK BERWUJUD (lanjutan)

Aset tetap dan aset hak guna (lanjutan)

Aset tetap terdiri atas (lanjutan):

13. PREMISES AND EQUIPMENTS, RIGHT-OF-USE ASSETS AND INTANGIBLE ASSETS (continued)

Premises and equipments and right-of-use assets (continued)

Premises and equipments consist of (continued):

31 Desember/December 31, 2020

	Saldo Awal/ Beginning Balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassifications	Saldo Akhir/ Ending Balance	
Akumulasi penyusutan						Accumulated depreciation
Bangunan	16.479.969	4.026.795	-	-	20.506.764	Buildings
Renovasi bangunan sewa	15.328.942	1.445.975	-	-	16.774.917	Office leasehold improvements
Kendaraan	15.885.800	2.012.875	-	-	17.898.675	Vehicles
Perlengkapan kantor	57.773.045	5.607.281	798.509	-	55.581.817	Office equipment
	98.467.756	13.092.926	798.509	-	110.762.173	
Aset hak guna	-	8.145.275	-	-	8.145.275	Right-of-use assets
	98.467.756	21.238.201	798.509	-	118.907.448	
Nilai buku neto	272.381.073				269.123.694	Net book value

Rincian aset hak guna pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

The details of right-of-use assets as of December 31, 2021 and 2020 are as follows:

31 Desember/December 31, 2021

	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Saldo akhir/ Ending balance	
Harga perolehan					Acquisition cost
Bangunan	22.982.539	3.858.215	12.541.295	14.299.459	Buildings
Kendaraan	2.779.475	-	-	2.779.475	Vehicles
	25.762.014	3.858.215	12.541.295	17.078.934	
Akumulasi penyusutan					Accumulated depreciation
Bangunan	7.164.903	11.062.284	12.541.295	5.685.892	Buildings
Kendaraan	980.372	980.372	-	1.960.744	Vehicles
	8.145.275	12.042.656	12.541.295	7.646.636	
Nilai buku neto	17.616.739			9.432.298	Net book value

31 Desember/December 31, 2020

	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Saldo akhir/ Ending balance	
Harga perolehan					Acquisition cost
Bangunan	12.180.489	10.802.050	-	22.982.539	Buildings
Kendaraan	2.779.475	-	-	2.779.475	Vehicles
	14.959.964	10.802.050	-	25.762.014	

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13. ASET TETAP, ASET HAK GUNA DAN ASET TAK BERWUJUD (lanjutan)

Aset tetap dan aset hak guna (lanjutan)

Rincian aset hak guna pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut (lanjutan):

31 Desember/December 31, 2020				
Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Saldo akhir/ Ending balance	
Akumulasi penyusutan				Accumulated depreciation
Bangunan	-	7.164.903	-	7.164.903
Kendaraan	-	980.372	-	980.372
	-	8.145.275	-	8.145.275
Nilai buku neto	14.959.964		17.616.739	Net book value

Beban hak guna yang dilaporkan dalam laporan laba rugi dan penghasilan komprehensif lain adalah sebagai berikut:

13. PREMISES AND EQUIPMENTS, RIGHT-OF-USE ASSETS AND INTANGIBLE ASSETS (continued)

Premises and equipments and right-of-use assets (continued)

The details of right-of-use assets as of December 31, 2021 and 2020 are as follows (continued):

Right-of-use expense that reported in the statements of profit or loss and other comprehensive income are as follows:

31 Desember/December 31, 2021				
Beban penyusutan aset hak guna/ Depreciation expense of right-of-use assets	Beban bunga liabilitas sewa/ Interest expense of lease liabilities	Beban yang berhubungan dengan sewa jangka pendek/ Expense related to short-term lease		
Bangunan	11.062.284	93.044	1.636.715	Buildings
Kendaraan	980.372	101.137	88.240	Vehicles
Total	12.042.656	194.181	1.724.955	Total

31 Desember/December 31, 2020				
Beban penyusutan aset hak guna/ Depreciation expense of right-of-use assets	Beban bunga liabilitas sewa/ Interest expense of lease liabilities	Beban yang berhubungan dengan sewa jangka pendek/ Expense related to short-term lease		
Bangunan	7.164.903	141.711	1.568.458	Buildings
Kendaraan	980.372	172.994	64.179	Vehicles
Total	8.145.275	314.705	1.632.637	Total

Rata-rata masa sewa berdasarkan kontrak yang dimiliki oleh Bank adalah 5 (lima) tahun.

The average lease period based on the contracts held by the Bank is 5 (five) years.

Bank juga memiliki sewa tertentu dengan masa sewa 12 (dua belas) bulan atau kurang dan sewa aset bernilai rendah. Bank menerapkan pengecualian untuk sewa jangka pendek dan sewa aset bernilai rendah untuk sewa tersebut.

The Bank also has certain leases with lease terms of 12 (twelve) months or less and leases with low-value assets. The Bank applies exemptions for short-term leases and leases with low-value assets for these leases.

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13. ASET TETAP, ASET HAK GUNA DAN ASET TAK BERWUJUD (lanjutan)

Aset tetap dan aset hak guna (lanjutan)

Jumlah penyusutan aset tetap yang dibebankan pada laporan laba rugi dan penghasilan komprehensif lain adalah masing-masing sebesar Rp23.830.256 dan Rp21.238.201 untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 (Catatan 32).

Bank telah mengasuransikan aset tetap kecuali hak atas tanah untuk menutup kemungkinan kerugian terhadap risiko kebakaran dan pencurian kepada PT Asuransi Jasa Tania Tbk dan PT BRI Asuransi Indonesia (pihak berelasi - Catatan 35) dengan nilai pertanggungan sebesar Rp293.869.731 dan Rp273.331.021 untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020.

Pada tanggal 31 Desember 2021 dan 2020, nilai tercatat bruto dari setiap aset tetap yang telah disusutkan penuh dan masih digunakan sebesar Rp75.426.397.

Pada tanggal 31 Desember 2021, aset dalam penyelesaian terdiri dari pengembangan *software APU-PTT* dengan estimasi presentase penyelesaian mencapai 95%, pengembangan *firewall* dengan estimasi presentase penyelesaian mencapai 95% dan pengadaan *network* dengan estimasi presentase penyelesaian mencapai 90%.

Pada tanggal 31 Desember 2020, aset dalam penyelesaian terdiri dari instalasi pendingin udara dengan estimasi persentase penyelesaian mencapai 85% dan pengembangan *software* dengan estimasi presentase penyelesaian mencapai 82%.

Rincian penjualan aset tetap Bank adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Harga perolehan		
Kendaraan	1.119.991	-
Perlengkapan kantor	2.733.742	798.509
	3.853.733	798.509
Akumulasi penyusutan	(3.689.521)	(798.509)
Nilai buku	164.212	-
Harga jual	785.099	5.751
Laba penjualan (Catatan 33)	620.887	5.751

13. PREMISES AND EQUIPMENTS, RIGHT-OF-USE ASSETS AND INTANGIBLE ASSETS (continued)

Premises and equipments and right-of-use assets (continued)

Depreciation of premises and equipments charged to the statement of profit or loss and other comprehensive income amounted to Rp23,830,256 and Rp21,238,201 for the year ended December 31, 2021 and 2020, respectively (Note 32).

The Bank has insured its premises and equipment except landrights for possible losses due to risks of fire and theft to PT Asuransi Jasa Tania Tbk and PT BRI Asuransi Indonesia (related parties - Note 35) with coverage amount of Rp293,869,731 and Rp273,331,021 for the year ended December 31, 2021 and 2020.

As of December 31, 2021 and 2020, the gross carrying amount of premises and equipments which have been fully depreciated and are still in use amounted to Rp75,426,397.

As of December 31, 2021, construction in progress consist of development of APU-PTT software with 95% estimated percentage of completion, firewall development with 95% estimated percentage of completion and network procurement with 90% estimated percentage of completion.

As of December 31, 2020, construction in progress consist of instalation of air conditioner with 85% estimated percentage of completion and software development with 82% estimated percentage of completion.

The detail of the sale of Bank's premises and equipments are as follows:

Acquisition cost
Vehicles
Office equipments
Accumulated depreciation
Book value
Selling price
Gain on sale (Note 33)

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13. ASET TETAP, ASET HAK GUNA DAN ASET TAK BERWUJUD (lanjutan)

Aset tetap dan aset hak guna (lanjutan)

Manajemen Bank memutuskan untuk melakukan penghapusbukuan atas sebagian aset tetap yang dimiliki dikarenakan aset tetap tersebut rusak, telah using, penutupan beberapa kantor cabang dan tidak memiliki nilai ekonomis untuk kedepannya. Untuk tahun yang berakhir pada tanggal 31 Desember 2021, harga perolehan dan akumulasi penyusutan aset tetap yang dihapusbuku masing-masing sebesar Rp4.950.798 dan Rp4.855.103, sehingga terdapat kerugian akibat hapus buku sebesar Rp95.965. Sedangkan untuk tahun yang berakhir pada tanggal 31 Desember 2020, harga perolehan dan akumulasi penyusutan aset tetap yang dihapusbuku masing-masing sebesar Rp503 dan Rp503.

Nilai Jual Obyek Pajak (NJOP) tanah dan bangunan yang dimiliki Bank pada tanggal 31 Desember 2021 masing-masing bernilai Rp201.338.035 dan Rp32.476.736, sedangkan pada tanggal 31 Desember 2020 masing-masing bernilai Rp200.585.951 dan Rp32.647.758. Selain tanah dan bangunan, tidak terdapat perbedaan signifikan antara nilai wajar aset dan nilai tercatatnya.

Aset tak berwujud

Aset tak berwujud terdiri atas:

13. PREMISES AND EQUIPMENTS, RIGHT-OF-USE ASSETS AND INTANGIBLE ASSETS (continued)

Premises and equipments and right-of-use assets (continued)

The Bank's management decided to write-off parts of owned premises and equipment since those premises and equipment were damaged, become obsolete, closing of several branch offices and have no future economic benefits. For the year ended December 31, 2021, acquisition costs and accumulated depreciation of written-off premises and equipments amounted to Rp4,950,798 and Rp4,855,103, respectively, therefore there is a loss due to write-off amounted to Rp95.965. Meanwhile, for the year ended December 31, 2020, acquisition costs and accumulated depreciation of written-off premises and equipments amounted to Rp503 and Rp503, respectively.

Taxable value of land rights and buildings owned by the Bank as of December 31, 2021 amounted to Rp201,338,035 and Rp32,476,736, respectively, meanwhile as of December 31, 2020 amounted to Rp200,585,951 and Rp32,647,758, respectively. Other than landrights and buldings, there are no significant difference between the fair value of the asset and its carrying amount.

Intangible assets

Intangible assets consist of:

31 Desember/December 31, 2021						
	Saldo Awal/ Beginning Balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassifications	Saldo Akhir/ Ending Balance	
Perangkat Lunak						Software
Harga perolehan	16.740.763	-	(585.105)	-	16.155.658	Acquisition cost
Akumulasi amortisasi	(8.426.388)	(1.979.237)	5.705	-	(10.399.920)	Accumulated Amortization
Nilai buku neto	8.314.375				5.755.738	Net book value
31 Desember/December 31, 2020						
	Saldo Awal/ Beginning Balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassifications	Saldo Akhir/ Ending Balance	
Perangkat lunak						Software
Harga perolehan	11.401.736	5.339.027	-	-	16.740.763	Acquisition cost
Akumulasi amortisasi	(6.701.974)	(1.724.414)	-	-	(8.426.388)	Accumulated amortization
Nilai buku neto	4.669.762				8.314.375	Net book value

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13. ASET TETAP, ASET HAK GUNA DAN ASET TAK BERWUJUD (lanjutan)

Aset tak berwujud (lanjutan)

Jumlah amortisasi aset tak berwujud yang dibebankan pada laporan laba rugi dan penghasilan komprehensif lain adalah masing-masing sebesar Rp1.979.237 dan Rp1.724.414 tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 (Catatan 32).

Pada tanggal 31 Desember 2021 dan 2020 termasuk dalam aset tak berwujud adalah aset dalam penyelesaian berupa pengembangan *software* masing-masing sebesar Rp357.500 dan Rp1.260.301 dengan estimasi persentase penyelesaian masing-masing sebesar 65% dan 80%.

Tidak ada aset tetap dan aset tak berwujud Bank yang dijadikan jaminan pada tanggal-tanggal 31 Desember 2021 dan 2020.

Manajemen berpendapat bahwa tidak terdapat penurunan nilai aset tetap dan jumlah nilai pertanggungan asuransi cukup untuk menutup risiko kerugian yang mungkin timbul atas aset tetap pada tanggal-tanggal 31 Desember 2021 dan 2020.

14. AGUNAN YANG DIAMBIL ALIH

Rincian agunan yang diambil alih (AYDA) yang dimiliki Bank pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

		31 Desember/December 31, 2021			
Debitur/Debtors	Jenis agunan yang diambil alih/ Type of foreclosed collaterals	Jumlah unit/kavling/ Number of unit/lot	Nilai tercatat awal/ Beginning carrying amount	Penyesuaian tahun berjalan/ Adjustment during the year	Nilai tercatat akhir/ Ending carrying amount
CV Fadilah Jaya	Tanah dan bangunan/Land and buildings	1	1.122.630	-	1.122.630
CV Syintia	Tanah dan bangunan/Land and buildings	1	1.083.240	-	1.083.240
Ifti Seviana	Tanah dan bangunan/Land and buildings	1	1.043.562	-	1.043.562
Yosi Agustina	Tanah dan bangunan/Land and buildings	1	913.237	-	913.237
Sutigno	Tanah dan bangunan/Land and buildings	1	895.400	-	895.400
Julian Sina	Tanah dan bangunan/Land and buildings	1	632.400	-	632.400
PT Rahesa Bumi Nusantara	Tanah dan bangunan/Land and buildings	1	353.231	-	353.231
Sutrisno	Tanah dan bangunan/Land and buildings	1	857.687	(857.687)	-
Irwan Dipraja	Tanah dan bangunan/Land and buildings	1	820.000	(820.000)	-
PT Mulyasari Ratnagumilang	Tanah dan bangunan/Land and buildings	1	540.600	(540.600)	-
PT Kebun Citra Nugraha	Tanah/Land	5	26.740	(26.740)	-
Total			8.288.727	(2.245.027)	6.043.700
Cadangan kerugian penurunan nilai/Allowance for impairment losses			(379.971)	(1.233.079)	(1.613.050)
Neto/Net			7.908.756	(3.478.106)	4.430.650

13. PREMISES AND EQUIPMENTS, RIGHT-OF-USE ASSETS AND INTANGIBLE ASSETS (continued)

Intangible assets (continued)

Amortization of intangible assets charged to the statement of profit or loss and other comprehensive income amounted to Rp1,979,237 and Rp1,724,414 for the year ended December 31, 2021 and 2020, respectively (Note 32).

As of December 31, 2021 and 2020, included in the intangible assets are construction in progress in the form of software development with an acquisition cost of Rp357,500 and Rp1,260,301, respectively, with the estimated percentage of completion are 65% and 80%, respectively.

There are no premises and equipments and intangible assets of the Bank that are pledged as collateral as of December 31, 2021 and 2020.

Management believes that there is no impairment of premises and equipments and the insurance coverage amount to cover the possibility of losses on premises and equipments is adequate as of December 31, 2021 and 2020.

14. FORECLOSED COLLATERALS

The details of foreclosed collaterals (AYDA) held by the Bank as of December 31, 2021 and 2020, are as follows:

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14. AGUNAN YANG DIAMBIL ALIH (lanjutan)

Rincian agunan yang diambil alih (AYDA) yang dimiliki Bank pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut (lanjutan):

Debitur/Debtors	Jenis agunan yang diambil alih/ Type of foreclosed collaterals
PT Prakawija Delaganda	Tanah dan bangunan/Land and buildings
PT Mulyasari Ratnagumilang	Tanah dan bangunan/Land and buildings
PT Kebun Citra Nugraha	Tanah/Land
CV Fadilah Jaya	Tanah dan bangunan/Land and buildings
CV Syintia	Tanah dan bangunan/Land and buildings
Ifti Seviana	Tanah dan bangunan/Land and buildings
Yosi Agustina	Tanah dan bangunan/Land and buildings
Sutigno	Tanah dan bangunan/Land and buildings
Julian Sina	Tanah dan bangunan/Land and buildings
PT Rahesa Bumi Nusantara	Tanah dan bangunan/Land and buildings
Sutrisno	Tanah dan bangunan/Land and buildings
Irwan Dipraja	Tanah dan bangunan/Land and buildings
Total	
Cadangan kerugian penurunan nilai/Allowance for impairment losses	
Neto/Net	

Untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020, Bank menjual agunan yang diambil alih dengan nilai penjualan masing-masing sebesar Rp2.390.000 dan Rp3.975.000, dengan nilai tercatat masing-masing sebesar Rp2.218.287 dan Rp3.522.774, serta mengakui keuntungan atas penjualan tersebut masing-masing sebesar Rp141.925 dan Rp420.726, setelah dikurangi biaya pelepasan masing-masing sebesar Rp29.788 dan Rp31.500 (Catatan 33).

Pada tanggal 31 Desember 2021, Bank telah melakukan hapus buku atas agunan yang diambil alih dengan nilai tercatat sebesar Rp26.740.

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Saldo awal	379.971	908.387
Pembentukan (pembalikan) cadangan selama tahun berjalan (Catatan 30)	1.259.819	(528.416)
Penghapusbukuan selama tahun berjalan	(26.740)	-
Saldo akhir	1.613.050	379.971

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai yang dibentuk pada tanggal-tanggal 31 Desember 2021 dan 2020 telah memadai.

14. FORECLOSED COLLATERALS (continued)

The details of foreclosed collaterals (AYDA) held by the Bank as of December 31, 2021 and 2020, are as follows (continued):

31 Desember/December 31, 2020			
Jumlah unit/kavling/ Number of unit/lot	Nilai tercatat awal/ Beginning carrying amount	Penyesuaian tahun berjalan/ Adjustment during the year	Nilai tercatat akhir/ Ending carrying amount
1	3.522.774	(3.522.774)	-
1	353.231	-	353.231
5	26.740	-	26.740
1	-	1.122.630	1.122.630
1	-	1.083.240	1.083.240
1	-	1.043.562	1.043.562
1	-	913.237	913.237
1	-	895.400	895.400
1	-	857.687	857.687
1	-	820.000	820.000
1	-	632.400	632.400
1	-	540.600	540.600
	3.902.745	4.385.982	8.288.727
	(908.387)	528.416	(379.971)
	2.994.358	4.914.398	7.908.756

For the year ended December 31, 2021 and 2020, the Bank sold foreclosed collaterals with selling price amounted to Rp2,390,000 and Rp3,975,000, respectively, with carrying amount amounted to Rp2,218,287 and Rp3,522,774, respectively, and recognized gain on the sale amounted to Rp141,925 and Rp420,726, respectively, after deducting selling cost amounted to Rp29,788 and Rp31,500, respectively (Note 33).

On December 31, 2021, the Bank has written-off foreclosed collaterals with carrying amount amounted to Rp26.740.

Movements of the allowance for impairment losses are as follows:

Beginning balance
Provision (reversal) for allowance during the year (Note 30)
Write-off during the year
Ending balance

Management believes that the allowance for impairment losses provided as of December 31, 2021 and 2020 are adequate.

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15. BIAYA DIBAYAR DIMUKA DAN ASET LAIN-LAIN

15. PREPAID EXPENSES AND OTHER ASSETS

	31 Desember/December 31, 2021		31 Desember/December 31, 2020		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah/ Equivalent	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah/ Equivalent	
Biaya Dibayar Dimuka Rupiah		6.047.085		5.738.899	Prepaid Expenses Rupiah
Aset Lain-lain Rupiah					Other Assets Rupiah
Piutang bunga		62.937.617		61.986.215	Interest receivables
Biaya praoperasional community branch		10.077.377		-	Community branch praoperational cost
Estimasi tagihan pajak (Catatan 21)		7.432.208		21.591.589	Estimated claim for tax refund (Note 21)
Setoran jaminan		670.245		801.105	Guarantee deposit
Lain-lain		3.716.961		7.033.616	Others
		84.834.408		91.412.525	
Dolar Amerika Serikat Piutang bunga	107.221	1.528.170	160.977	2.261.729	United States Dollar Interest receivables
		86.362.578		93.674.254	
Total		92.409.663		99.413.153	Total

16. LIABILITAS SEGERA

16. LIABILITIES DUE IMMEDIATELY

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Rupiah			Rupiah
Umum dan administrasi	4.776.058	8.755.272	General and administrative
Titipan transfer dan ATM	3.409.781	5.943.069	Transfer and ATM deposits
Personalia	1.023.855	21.798	Personnel
Lain-lain	706.300	646.666	Others
	9.915.994	15.366.805	
Dolar Amerika Serikat			United States Dollar
Umum dan administrasi	10.303	10.156	General and administrative
Titipan transfer	5	436.247	Transfer deposits
	10.308	446.403	
Total	9.926.302	15.813.208	Total

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17. GIRO

17. DEMAND DEPOSITS

	31 Desember/December 31, 2021		31 Desember/December 31, 2020		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	
Pihak ketiga					Third parties
Rupiah		1.921.608.246		2.286.912.779	Rupiah
Dolar Amerika Serikat	2.335.739	33.290.116	32.093.725	450.916.837	United States Dollar
		1.954.898.362		2.737.829.616	
Pihak berelasi (Catatan 35)					Related parties (Note 35)
Rupiah		94.263.375		834.348.352	Rupiah
Dolar Amerika Serikat	123.902	1.765.906	12.805.420	179.916.146	United States Dollar
		96.029.281		1.014.264.498	
Total		2.050.927.643		3.752.094.114	Total

Tingkat suku bunga rata-rata per tahun untuk giro:

The annual average interest rates for demand deposits:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Rupiah	3,12%	2,45%	Rupiah
Dolar Amerika Serikat	0,94%	0,77%	United States Dollar

Giro yang dijadikan jaminan atas fasilitas perbankan yang diberikan oleh Bank adalah sebesar Rp66.395.660 dan Rp1.936.330.520 masing-masing pada tanggal 31 Desember 2021 dan 2020.

Demand deposits used as collateral for banking facilities granted by the Bank is amounted to Rp66,395,660 and Rp1,936,330,520 as of December 31, 2021 and 2020, respectively.

18. TABUNGAN

18. SAVING DEPOSITS

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Pihak ketiga			Third parties
Rupiah			Rupiah
Tabungan Premium	2.203.221.126	454.747.555	Tabungan Premium
Tabungan Raya	305.390.137	312.677.755	Tabungan Raya
Tabungan Berhadiah	248.995.046	206.561.232	Tabungan Berhadiah
Tabungan Masa Depan	14.571.067	14.020.716	Tabungan Masa Depan
Tabunganku	5.844.183	8.094.298	Tabunganku
	2.778.021.559	996.101.556	

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18. TABUNGAN (lanjutan)

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak berelasi (Catatan 35)		
Rupiah		
Tabungan Premium	152.074.502	489.878.297
Tabungan Raya	65.670.101	241.881.362
Tabungan Berhadiah	26.575.105	5.414.946
Tabungan Masa Depan	289.732	31.824
Tabunganku	7.503	287
	<u>244.616.943</u>	<u>737.206.716</u>
Total	3.022.638.502	1.733.308.272

Tingkat suku bunga rata-rata per tahun untuk tabungan adalah 3,91% dan 4,65% masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020.

Tabungan yang dijadikan jaminan atas fasilitas perbankan yang diberikan oleh Bank masing-masing sebesar Rp3.190.000 dan Rp26.942.500 pada tanggal 31 Desember 2021 dan 2020.

18. SAVING DEPOSITS (continued)

Related parties (Note 35)
Rupiah
Tabungan Premium
Tabungan Raya
Tabungan Berhadiah
Tabungan Masa Depan
Tabunganku

The annual average interest rates for saving deposits are 3.91% and 4.65% for the year ended December 31, 2021 and 2020, respectively.

Savings deposits used as collateral for banking facilities granted by the Bank is amounted to Rp3,190,000 and Rp26,942,500 as of December 31, 2021 and 2020, respectively.

19. DEPOSITO BERJANGKA

	31 Desember/December 31, 2021	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Pihak ketiga		
Rupiah		
Dolar Amerika Serikat	69.675.181	6.693.143.686
		<u>993.045.512</u>
		7.686.189.198
Pihak berelasi (Catatan 35)		
Rupiah		
Dolar Amerika Serikat	218.812	733.417.764
		<u>3.118.621</u>
		736.536.385
Total		8.422.725.583

Deposito berjangka berdasarkan periode kontrak adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
Deposits on call	-	323.100.000
Deposito		
1 bulan	3.105.285.141	6.566.493.205
3 bulan	2.766.833.726	4.374.424.483

19. TIME DEPOSITS

	31 Desember/December 31, 2020	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Pihak ketiga		
Rupiah		
Dolar Amerika Serikat	39.647.855	12.461.423.794
		<u>557.052.366</u>
		13.018.476.160
Pihak berelasi (Catatan 35)		
Rupiah		
Dolar Amerika Serikat	99.997.278	3.086.438.448
		<u>1.404.961.752</u>
		4.491.400.200
Total		17.509.876.360

Time deposits based on their contractual periods are as follows:

Third parties
Rupiah
Deposits on call
Deposits
1 month
3 months

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19. DEPOSITO BERJANGKA (lanjutan)

Deposito berjangka berdasarkan periode kontrak adalah sebagai berikut (lanjutan):

19. TIME DEPOSITS (continued)

Time deposits based on their contractual periods are as follows (continued):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga (lanjutan)		
Rupiah (lanjutan)		
Deposito (lanjutan)		
6 bulan	743.239.307	1.049.986.788
12 bulan	77.785.512	147.419.318
	6.693.143.686	12.461.423.794
Dolar Amerika Serikat		
Deposito		
1 bulan	756.386.281	88.105.843
3 bulan	36.142.338	104.137.182
6 bulan	200.516.893	214.145.491
12 bulan	-	150.663.850
	993.045.512	557.052.366
	7.686.189.198	13.018.476.160
Pihak berelasi (Catatan 35)		
Rupiah		
Deposits on call	-	25.000.000
Deposito		
1 bulan	635.096.017	2.423.164.906
3 bulan	96.609.978	329.759.742
6 bulan	520.000	216.381.000
12 bulan	1.191.769	92.132.800
	733.417.764	3.086.438.448
Dolar Amerika Serikat		
Deposito		
1 bulan	3.056.275	29.900.671
3 bulan	32.565	31.979
6 bulan	22.280	1.302.435.000
12 bulan	7.501	72.594.102
	3.118.621	1.404.961.752
	736.536.385	4.491.400.200
Total	8.422.725.583	17.509.876.360

Third parties (continued)
Rupiah (continued)
Deposits (continued)
6 months
12 months

United States Dollar
Deposits
1 month
3 months
6 months
12 months

Related parties (Note 35)
Rupiah
Deposits on call
Deposits
1 month
3 months
6 months
12 months

United States Dollar
Deposits
1 month
3 months
6 months
12 months

Total

Tingkat suku bunga rata-rata per tahun untuk deposito berjangka:

The annual average interest rates for time deposits:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah	4,10%	6,81%
Dolar Amerika Serikat	1,22%	2,90%

Rupiah
United States Dollar

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19. DEPOSITO BERJANGKA (lanjutan)

Deposito berjangka yang dijadikan jaminan atas fasilitas perbankan yang diberikan oleh Bank masing-masing sebesar Rp5.080.000 dan Rp331.257.712 pada tanggal 31 Desember 2021 dan 2020.

19. TIME DEPOSITS (continued)

Time deposits used as collateral for banking facilities granted by the Bank is amounted to Rp5,080,000 and Rp331,257,712 as of December 31, 2021 and 2020, respectively.

20. SIMPANAN DARI BANK LAIN

20. DEPOSITS FROM OTHER BANKS

	31 Desember/December 31, 2021		31 Desember/December 31, 2020		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	
Pihak ketiga					Third parties
Rupiah					Rupiah
Deposito berjangka		2.000.000		2.000.000	Time deposits
Giro		4.801		412.997	Demand deposits
		2.004.801		2.412.997	
Dolar Amerika Serikat					United States Dollar
Inter-bank call money	16.000.000	228.040.000	-	-	Inter-bank call money
		230.044.801		2.412.997	
Pihak berelasi (Catatan 35)					Related parties (Note 35)
Dolar Amerika Serikat					United States Dollar
Inter-bank call money	5.000.000	71.262.500	15.000.000	210.750.000	Inter-bank call money
		71.262.500		210.750.000	
Total		301.307.301		213.162.997	Total

Tingkat suku bunga rata-rata per tahun untuk simpanan dari bank lain adalah:

The annual average interest rates for deposits from other banks are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Rupiah			Rupiah
Deposito berjangka	3,06%	0,34%	Time deposits
Giro	1,26%	2,01%	Demand deposits
Dolar Amerika Serikat			United States Dollar
Inter-bank call money	0,20%	0,77%	Inter-bank call money

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20. SIMPANAN DARI BANK LAIN (lanjutan)

Klasifikasi jangka waktu simpanan dari bank lain berdasarkan sisa umur jatuh tempo adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pihak ketiga		
Rupiah		
≤ 1 bulan		
Deposito berjangka	2.000.000	2.000.000
Giro	4.801	412.997
	2.004.801	2.412.997
Dolar Amerika Serikat		
≤ 1 bulan		
Inter-bank call money	228.040.000	-
	230.044.801	2.412.997
Pihak berelasi (Catatan 35)		
Dolar Amerika Serikat		
> 3 bulan - 1 tahun		
Inter-bank call money	71.262.500	210.750.000
	71.262.500	210.750.000
Total	301.307.301	213.162.997

Pada tanggal-tanggal 31 Desember 2021 dan 2020, tidak terdapat simpanan dari bank lain yang dijadikan sebagai jaminan atas fasilitas perbankan yang diberikan oleh Bank.

20. DEPOSITS FROM OTHER BANKS (continued)

The classification by period of deposits from other banks based on remaining period to maturity are as follows:

Third parties
Rupiah
≤ 1 month
Time deposits
Demand deposits
United States Dollar
≤ 1 month
Inter-bank call money
Related parties (Note 35)
United States Dollar
> 3 months - 1 year
Inter-bank call money

Total

As of December 31, 2021 and 2020, there are no deposits from other banks used as collateral for banking facilities granted.

21. PERPAJAKAN

a) Utang pajak

Pada tanggal-tanggal 31 Desember 2021 dan 2020, rincian utang pajak adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pajak penghasilan		
Pasal 21	4.262.308	3.978.579
Pasal 23	464.738	180.983
Pasal 29	-	3.483.848
Pasal 4 ayat (2)	7.924.777	17.691.383
Pajak pertambahan nilai	159	10.660
Total	12.651.982	25.345.453

21. TAXATION

a) Taxes payable

As of December 31, 2021 and 2020, the details of taxes payable are as follows:

Income tax
Article 21
Article 23
Article 29
Article 4 (2)
Value added tax

Total

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21. PERPAJAKAN (lanjutan)

21. TAXATION (continued)

b) (Manfaat) beban pajak

b) Tax (benefit) expense

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Beban pajak kini			Current tax expense
Tahun berjalan	-	16.435.080	Current year
Periode lalu dari hasil pemeriksaan pajak	13.521.982	-	Prior year tax assessment
(Manfaat) beban pajak tangguhan	(270.951.923)	16.375.995	Deferred tax (benefit) expense
	(257.429.941)	32.811.075	

Rekonsiliasi antara laba sebelum beban pajak seperti yang disajikan dalam laporan laba rugi dan penghasilan komprehensif lain dan taksiran penghasilan kena pajak adalah sebagai berikut:

The reconciliation between income before tax expense as presented in the statement of profit or loss and other comprehensive income and estimated taxable income are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Laba sebelum beban pajak sesuai dengan laporan laba rugi dan penghasilan komprehensif lain	(3.303.131.348)	64.071.757	Income before tax expense based on the statement of profit or loss and other comprehensive income
Perbedaan temporer			Temporary differences
Pembentukan cadangan beban pegawai	11.648.351	9.287.263	Provision for employee expenses
Pembentukan atas cadangan kerugian penurunan nilai diluar kredit yang diberikan	(4.724.293)	5.375.406	Provision of allowance for impairment losses on non-loans
Penyusutan aset tetap	(4.094.348)	(1.985.365)	Depreciation of premises and equipment
Kerugian (keuntungan) yang belum direalisasi dari nilai efek-efek yang diukur pada nilai wajar melalui laba rugi	(644.000)	(6.678.710)	Unrealized loss (gain) on fair value through profit or loss
(Pembalikan) pembentukan cadangan litigasi	10.138.254	-	(Reversal) Provision for Litigation
(Pembalikan) pembentukan cadangan kerugian kredit yang diberikan	1.217.731.856	(12.449.521)	(Reversal) provision for allowance for impairment losses on loans
Opsi saham	(16.692.931)	-	Shares option
Estimasi kerugian komitmen dan kontijensi	17.168.682	-	Estimated losses on commitment and contingencies
	1.230.531.571	(6.450.927)	

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21. PERPAJAKAN (lanjutan)

b) (Manfaat) beban pajak (lanjutan)

Rekonsiliasi antara laba sebelum beban pajak seperti yang disajikan dalam laporan laba rugi dan penghasilan komprehensif lain dan taksiran penghasilan kena pajak adalah sebagai berikut (lanjutan):

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Perbedaan tetap		
Representasi dan sumbangan	15.568.027	10.760.191
Kegiatan pegawai	3.664.448	1.880.477
Biaya sewa dan pemeliharaan rumah dinas	1.738.949	1.763.395
Lain-lain	26.265.072	2.680.017
	47.236.496	17.084.080
Taksiran penghasilan kena pajak	(2.025.363.281)	74.704.910

Perhitungan beban dan utang pajak penghasilan badan adalah sebagai berikut:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Taksiran penghasilan kena pajak	(2.025.363.281)	74.704.910
Beban pajak kini	-	16.435.080
Pembayaran angsuran pajak penghasilan selama tahun berjalan	(7.432.208)	(12.951.232)
Estimasi (tagihan) utang pajak penghasilan - Pasal 29 (Catatan 15)	(7.432.208)	3.483.848

21. TAXATION (continued)

b) Tax (benefit) expense (continued)

The reconciliation between income before tax expense as presented in the statement of profit or loss and other comprehensive income and estimated taxable income are as follows (continued):

Permanent differences
Representations and donations
Employee activities
Rent and maintenance of
office housing expenses
Others

Estimated taxable income

The computation of corporate income tax expense and income tax payable are as follows:

Estimated taxable income
Current tax expense
Income tax installment payments
during the years
**Estimated corporate income tax
(receivable) payable - Article 29
(Note 15)**

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21. PERPAJAKAN (lanjutan)

b) (Manfaat) beban pajak (lanjutan)

Rekonsiliasi atas (manfaat) beban pajak penghasilan dengan perkalian (rugi) laba sebelum pajak penghasilan dan tarif pajak yang berlaku adalah sebagai berikut:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Laba sebelum beban pajak sesuai dengan laporan laba rugi dan penghasilan komprehensif lain	(3.303.131.348)	64.071.757
Beban pajak dengan tarif yang berlaku	(726.688.897)	14.095.787
Pengaruh pajak atas beda tetap	10.392.029	3.758.498
Pengaruh penurunan tarif pajak	(234.977)	14.956.790
Aset pajak tangguhan yang tidak diakui	445.579.922	-
Koreksi hasil pemeriksaan pajak penghasilan tahun sebelumnya	13.521.982	-
	(257.429.941)	32.811.075

Tarif pajak efektif rata-rata (beban pajak dibagi laba sebelum pajak) Bank untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar 7,79% dan 51,21%.

Berdasarkan peraturan perpajakan di Indonesia, Bank menyampaikan Surat Pemberitahuan Pajak Tahunan ke Kantor Pajak atas *self-assessment*. Perhitungan pajak penghasilan badan untuk tahun yang berakhir 31 Desember 2021 merupakan perhitungan sementara yang dibuat untuk tujuan laporan keuangan ini dan dapat berubah pada saat Bank menyampaikan Surat Pemberitahuan Tahunan (SPT) pajaknya.

Kantor Pajak berhak memeriksa atau mengoreksi pajak dalam jangka waktu 5 (lima) tahun setelah tanggal pajak terutang.

Perhitungan pajak penghasilan untuk tahun yang berakhir pada tanggal 31 Desember 2020 telah sesuai dengan surat Pemberitahuan Tahunan (SPT) Pajak Penghasilan Badan yang dilaporkan.

21. TAXATION (continued)

b) Tax (benefit) expense (continued)

The reconciliation of income tax (benefit) expense by multiplying (loss) income before income tax to the applicable tax rate are as follows:

Income before tax expense based on the statement of profit or loss and other comprehensive income

Tax expense with applicable tax rates

Tax effect on permanent differences

Effect on reduction in tax rates

Unrecognized deferred tax assets

Correction of prior year income tax assessment

The Bank's tax effective rate (tax expenses divided income before tax) are 7.79% and 51.21% for the year ended December 31, 2021 and 2020, respectively.

Based on tax regulations in Indonesia, the Bank submit their Annual Tax Returns to the tax office on a self-assessment basis. The corporate income tax calculation for the year ended December 31, 2021 is a preliminary estimate prepared for financial statement purposes and subject to revision when The Bank lodges its annual tax returns (SPT).

The tax office has the right to inspect or correct taxes with 5 (five) years after the date of the tax due.

The income tax calculation for the year ended December 31, 2020 already in line with the submitted Annual Income Tax Return.

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21. PERPAJAKAN (lanjutan)

b) (Manfaat) beban pajak (lanjutan)

Pemeriksaan tahun pajak 2019

Pada tanggal 26 April 2021, Bank telah menerima Surat Ketetapan Pajak Kurang Bayar (SKPKB) dan Surat Tagihan Pajak (STP) Pajak Pertambahan Nilai (PPN) yang telah disetujui oleh Bank, dengan rincian sebagai berikut:

SKPKB	
No. 00006/267/19/054/21	12.220
No. 00005/267/19/054/21	12.769
No. 00004/267/19/054/21	13.067
No. 00003/267/19/054/21	12.985
	51.041
STP	
No. 00080/107/19/054/21	14.253
No. 00161/207/19/054/21	183.812
No. 00160/207/19/054/21	209
	198.274
	249.315

Pada tanggal 26 April 2021, Bank telah menerima Surat Ketetapan Pajak Kurang Bayar (SKPKB) dan Surat Tagihan Pajak (STP) Pajak Penghasilan (PPH) Pasal 21 yang telah disetujui oleh Bank, dengan rincian sebagai berikut:

SKPKB	
No. 00019/201/19/054/21	2.139.543
STP	
No. 00068/101/16/511/17	64
No. 00002/101/16/441/18	111
No. 00002/140/16/441/18	6.256
No. 00006/140/16/441/18	6.248
No. 00005/140/16/441/18	6.079
No. 00001/140/16/441/18	5.868
No. 00003/140/16/441/18	5.248
No. 00004/140/16/441/18	65
No. 00079/140/17/441/18	21.448
No. 00476/101/17/441/18	249
No. 00477/101/17/441/18	57
No. 00475/101/17/441/18	46
No. 00003/140/15/441/19	6.614
No. 00001/101/15/441/19	221
No. 00002/101/15/441/19	148
No. 00001/103/15/441/19	100
No. 00017/103/20/404/20	100
No. 00004/140/20/441/21	569
	59.491
	2.199.034

21. TAXATION (continued)

b) Tax (benefit) expense (continued)

Assessment for fiscal year 2019

On April 26, 2021, the Bank has received Underpayment Tax Assessment Letters (TAL) and Tax Collection Letters (TCL) for Value Added Tax (VAT) that has been approved by the Bank, with the following details:

Underpayment TAL	
No. 00006/267/19/054/21	
No. 00005/267/19/054/21	
No. 00004/267/19/054/21	
No. 00003/267/19/054/21	
TCL	
No. 00080/107/19/054/21	
No. 00161/207/19/054/21	
No. 00160/207/19/054/21	

On April 26, 2021, the Bank has received Underpayment Tax Assessment Letters (TAL) and Tax Collection Letters (TCL) for Income Tax Article 21 that has been approved by the Bank, with the following details:

Underpayment TAL	
No. 00019/201/19/054/21	
TCL	
No. 00068/101/16/511/17	
No. 00002/101/16/441/18	
No. 00002/140/16/441/18	
No. 00006/140/16/441/18	
No. 00005/140/16/441/18	
No. 00001/140/16/441/18	
No. 00003/140/16/441/18	
No. 00004/140/16/441/18	
No. 00079/140/17/441/18	
No. 00476/101/17/441/18	
No. 00477/101/17/441/18	
No. 00475/101/17/441/18	
No. 00003/140/15/441/19	
No. 00001/101/15/441/19	
No. 00002/101/15/441/19	
No. 00001/103/15/441/19	
No. 00017/103/20/404/20	
No. 00004/140/20/441/21	

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21. PERPAJAKAN (lanjutan)

b) (Manfaat) beban pajak (lanjutan)

Pemeriksaan tahun pajak 2019 (lanjutan)

Pada tanggal 26 April 2021, Bank telah menerima Surat Ketetapan Pajak Kurang Bayar (SKPKB) Pajak Penghasilan (PPH) Pasal 4 ayat (2) No. 00014/240/19/054/21 sebesar Rp2.587.257 yang telah disetujui oleh Bank.

Pada tanggal 26 April 2021, Bank telah menerima Surat Ketetapan Pajak Lebih Bayar (SKPLB) Pajak Penghasilan (PPH) Pasal 29 No. 00053/406/19/054/21 sebesar Rp8.069.608 yang telah disetujui oleh Bank.

Pada tanggal 11 Juni 2021, Bank telah menerima pengembalian kelebihan pembayaran pajak PPH Pasal 29 setelah dikurangi dengan SKP dan STP PPN, PPH Pasal 21 dan PPh Pasal 4 ayat (2) sebesar Rp3.034.001.

c) Aset pajak tangguhan

Perhitungan beban pajak tangguhan Bank adalah sebagai berikut:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
(Pembalikan) pembentukan cadangan kerugian aset produktif dan non produktif	270.638.774	(15.058.971)
(Pembalikan) pembentukan cadangan litigasi	2.230.416	-
Penyusutan aset tetap	(665.779)	(436.780)
Kerugian (keuntungan) yang belum direalisasi dari nilai efek-efek yang diukur pada nilai wajar melalui laba rugi	(141.680)	(1.469.316)
Pembentukan cadangan beban pegawai	2.562.637	(334.740)
Opsi saham	(3.672.445)	923.812
Total (beban) pendapatan pajak tangguhan	270.951.923	(16.375.995)

21. TAXATION (continued)

b) Tax (benefit) expense (continued)

Assessment for fiscal year 2019 (continued)

On April 26, 2021, the Bank has received Underpayment Tax Assessment Letters (TAL) for Income Tax Article 4 (2) No. 00014/240/19/054/21 amounted to Rp2,587,257 that has been approved by the Bank.

On April 26, 2021, the Bank has received Overpayment Tax Assessment Letters (TAL) for Income Tax Article 29 No. 00053/406/19/054/21 amounted to Rp8,069,608 that has been approved by the Bank.

On June 11, 2021, the Bank has received a refund of the Income Tax Article 29 overpayment after deducting the Value Added Tax, Income Tax Article 21 and Income Tax Article 4 (2) TAL and TCL amounted Rp3,034,001.

c) Deferred tax assets

The computation of deferred tax expense of the Bank are as follows:

(Reversal) provision for allowance for impairment losses on earning assets and non-earning assets
(Reversal) Provision for Litigation
Depreciation of premises and equipment
Unrealized loss (gain) on fair value through profit or loss securities
Provision for employee expenses
Shares option
Total deferred tax (expense) benefit

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21. PERPAJAKAN (lanjutan)

c) Aset pajak tangguhan (lanjutan)

Pengaruh pajak atas perbedaan temporer yang signifikan antara pelaporan komersial dan pajak (dicatat pada akun "Aset Pajak Tangguhan") adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Cadangan kerugian aset produktif dan non produktif	367.405.397	96.766.623
Cadangan litigasi	2.230.416	-
Cadangan beban pegawai	18.195.378	15.632.741
Penyusutan aset tetap	(3.387.587)	(2.721.808)
Kerugian yang belum direalisasi dari nilai efek-efek yang diukur pada nilai wajar melalui laba rugi	1.133.704	1.275.384
Keuntungan yang belum direalisasi dari efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(15.249.295)	(19.602.776)
Pengukuran kembali program imbalan pasti	1.016.218	(1.039.107)
Opsi Saham	395.199	4.067.644
Aset pajak tangguhan	371.739.430	94.378.701

Manajemen Bank berpendapat bahwa aset pajak tangguhan yang timbul dari perbedaan temporer diperkirakan dapat direalisasikan pada periode mendatang.

Pada tanggal 31 Desember 2021, aset pajak tangguhan sebesar Rp445.579.922 yang berasal dari kerugian pajak, tidak diakui oleh Bank karena tidak terdapat kemungkinan besar bahwa perbedaan temporer tersebut dapat direalisasikan pada periode mendatang.

Pada tanggal 31 Maret 2020, Presiden Republik Indonesia menandatangani Peraturan Pemerintah Pengganti Undang-Undang (Perppu) No. 1 Tahun 2020 tentang "Kebijakan Keuangan Negara dan Stabilitas Sistem Keuangan untuk Penanganan Pandemi Corona Virus Disease 2019 (Covid-19) dan/atau Dalam Rangka Menghadapi Ancaman yang Membahayakan Perekonomian Nasional dan/atau Stabilitas Sistem Keuangan", yang mengatur penyesuaian tarif PPh badan menjadi 22% untuk tahun pajak 2020 dan 2021 serta 20% untuk tahun pajak 2022.

21. TAXATION (continued)

c) Deferred tax assets (continued)

The tax effects of significant temporary differences between commercial reporting and tax reporting (recorded under "Deferred Tax Assets") are as follows:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
			Allowance for impairment losses on earning assets and non-earning assets
			Allowance for litigation
			Allowance for employee benefits
			Depreciation of premises and equipment
			Unrealized loss on fair value through profit or loss securities
			Unrealized gain on securities measured at fair value through other comprehensive income
			Remeasurement on defined benefit plan
			Shares Opinion
			Deferred tax assets

The Bank's management believes that the deferred tax assets resulted from temporary differences can be realised in the next period.

As of December 31, 2021, deferred tax assets amounted to Rp445,579,922 arising from tax loss carry forward, have not been recognised by the Bank because it is not probable that there will be realised in the next periods.

On March 31, 2020, the President of the Republic of Indonesia signed Government Regulation as a Substitute of Laws (Perppu) No. 1 Year 2020 regarding "State Financial Policy and Financial System Stability for Handling Corona Virus Disease (Covid-19) and/or in Order to Face Threats to Harm the National Economy and/or Financial System Stability", which regulates the adjustment of corporate income tax to 22% effective starting fiscal year 2020 and 2021 and 20% effective starting Fiscal Year 2022.

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21. PERPAJAKAN (lanjutan)

Pada tanggal 29 Oktober 2021, Presiden Republik Indonesia menandatangani UU No.7 Tahun 2021 tentang "Harmonisasi Peraturan Perpajakan", yang menerapkan, antara lain, tarif pajak penghasilan badan sebesar 22% yang mulai berlaku pada tahun pajak 2022 (sebelumnya 20% yang diatur dalam Perppu No. 1 Tahun 2020 tertanggal 31 Maret 2020)

21. TAXATION (continued)

On October 29, 2021, the President of the Republic of Indonesia signed UU No.7/2021 regarding "Harmonization of Tax Regulation", which applies, among others, the corporate income tax rate of 22% effective starting fiscal year 2022 (previously 20% as stipulated in Perppu No. 1 Year 2020 dated March 31, 2020).

22. SURAT BERHARGA YANG DITERBITKAN

Bank menerbitkan surat berharga dengan rincian sebagai berikut:

22. MARKETABLE SECURITIES ISSUED

The Bank issued marketable securities with details as follows:

	31 Desember/ December 31, 2021
Rupiah	
Obligasi I Tahun 2017 setelah dikurangi biaya emisi obligasi yang belum diamortisasi masing-masing sebesar Rp137.072 dan Rp384.299 pada tanggal-tanggal 31 Desember 2021 dan 2020	238.862.928

	31 Desember/ December 31, 2020
Rupiah	
Bonds I Year 2017 net of unamortized issuance cost amounted to Rp137,072 and Rp384,299 as of December 31, 2021 and 2020, respectively	238.615.701

Amortisasi atas biaya emisi surat berharga yang diterbitkan untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 adalah sebesar Rp247.227 dan Rp456.342.

The amortization of issuance cost of marketable securities issued for the year ended December 31, 2021 and 2020 amounted to Rp247,227 and Rp456,342.

Pada tanggal 7 Juli 2017, Bank menerbitkan Obligasi I Tahun 2017 dengan nilai pokok sebesar Rp500.000.000 dalam 2 (dua) seri sebagai berikut:

On July 7, 2017, the Bank issued Bonds I Year 2017 at principal value of Rp500,000,000 in 2 (two) series, as follows:

- Seri A: Nilai pokok sebesar Rp261.000.000 dengan tingkat bunga tetap sebesar 8,25% per tahun dan jangka waktu 3 (tiga) tahun serta akan jatuh tempo pada tanggal 7 Juli 2020.
- Seri B: Nilai pokok sebesar Rp239.000.000 dengan tingkat bunga tetap sebesar 8,50% per tahun dan jangka waktu 5 (lima) tahun serta akan jatuh tempo pada tanggal 7 Juli 2022.

- Series A: Principal value amounted to Rp261,000,000 with a fixed interest rate of 8.25% per annum and a period of 3 (three) years that will mature on July 7, 2020.
- Series B: Principal value amounted to Rp239,000,000 with a fixed interest rate of 8.50% per annum and a period of 5 (five) years that will mature on July 7, 2022.

Bunga Obligasi I Tahun 2017 dibayarkan setiap 3 (tiga) bulan mulai tanggal 7 Oktober 2017.

The interest of Bonds I Year 2017 is paid every 3 (three) months, starting from October 7, 2017.

Pada saat diterbitkan, obligasi ini diperingkat oleh Pefindo dengan rating idAA. Pada tanggal-tanggal 31 Desember 2021 dan 2020, obligasi ini memperoleh rating idAA dari Pefindo.

On the issue date, Pefindo gave these bonds an idAA rating. As of December 31, 2021 and 2020 these bonds obtained an idAA rating from Pefindo.

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22. SURAT BERHARGA YANG DITERBITKAN
(lanjutan)

Penerimaan neto dari penerbitan obligasi tersebut dimanfaatkan untuk penyaluran kredit.

Persyaratan penting dalam perjanjian obligasi adalah Bank tanpa persetujuan tertulis dari agen pemantau tidak akan mengurangi modal dasar, ditempatkan dan disetor, melakukan penggabungan, pemisahan, peleburan dan pengambilalihan perusahaan.

Manajemen Bank berpendapat bahwa semua persyaratan/pembatasan yang ditetapkan dalam perjanjian perwalianamanatan telah dipenuhi.

Obligasi I Tahun 2017 Seri A dengan nilai nominal sebesar Rp261.000.000 telah dilunasi oleh Bank pada tanggal jatuh temponya.

22. MARKETABLE SECURITIES ISSUED (continued)

The net proceeds from the issuance of bonds will be used for loans granting.

One important covenant stated in the agreement of bonds is that Bank shall not, without the written approval from the supervisory agent, reduce authorized, issued and paid-up capital, nor perform merger, spin-off, consolidation nor perform takeovers of another company.

The Management of the Bank believed that all covenants/restrictions required under the trustee agreement have been complied with.

Bonds I Year 2017 Series A with a nominal value of Rp261,000,000 has been paid by the Bank on the maturity date.

23. PINJAMAN YANG DITERIMA

Pinjaman yang diterima terdiri atas:

	31 Desember/ December 31, 2021
Pihak berelasi (Catatan 35)	
Rupiah	
PT Sarana Multigriya Finansial	16.517.311

Klasifikasi jangka waktu pinjaman yang diterima berdasarkan sisa umur sampai dengan saat jatuh tempo adalah sebagai berikut:

	31 Desember/ December 31, 2021
Pihak berelasi (catatan 35)	
Rupiah	
> 5 tahun	16.517.311

Pada tanggal 14 Desember 2020, Bank menandatangani perjanjian fasilitas pinjaman dengan PT Sarana Multigriya Finansial untuk penyaluran KPR Sejahtera bagi masyarakat berpenghasilan rendah.

23. FUND BORROWINGS

Fund borrowings consist of:

	31 Desember/ December 31, 2020	Related parties (Note 35)
		Rupiah
PT Sarana Multigriya Finansial	17.318.944	PT Sarana Multigriya Finansial

The classification of the fund borrowings' period based on the remaining life until maturity are as follows:

	31 Desember/ December 31, 2020	Related parties (Note 35)
		Rupiah
> 5 tahun	17.318.944	> 5 tahun

On December 14, 2020, the Bank entered into a borrowing facility agreement with PT Sarana Multigriya Financial for channelling of KPR Sejahtera for low-income community.

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23. PINJAMAN YANG DITERIMA (lanjutan)

Fasilitas pinjaman ini memiliki jangka waktu paling lama 20 (dua puluh) tahun sejak tanggal pencairan fasilitas pinjaman dengan suku bunga paling rendah sebesar 4,45% per tahun dan *availability period* sampai dengan tanggal 31 Desember 2020. Angsuran pokok fasilitas pinjaman dibayarkan pada tanggal 10 (sepuluh) setiap bulan bersamaan dengan pembayaran bunga, dimana angsuran pokok pertama kali mulai dibayarkan pada tanggal 10 Februari 2021 sebesar Rp157.003 sampai dengan jatuh tempo. Bank tidak memberikan jaminan apapun atas pinjaman ini.

Persyaratan-persyaratan (covenants) penting dalam perjanjian pinjaman ini antara lain, sebelum memperoleh persetujuan tertulis, Bank tidak diperkenankan untuk:

- Mengajukan permohonan pailit;
- Mengalihkan dan/atau menyerahkan kepada pihak lain, hak dan kewajiban yang timbul akibat perjanjian ini;
- Mengikatkan diri sebagai penanggung atau penjamin utang dan menjaminkan harta kekayaan Bank;
- Menggunakan fasilitas pinjaman tidak sesuai dengan tujuannya.

Manajemen Bank berpendapat bahwa semua persyaratan yang ditetapkan telah dipenuhi.

23. FUND BORROWINGS (continued)

This borrowing facility has a maximum term of 20 (twenty) years from the date of the borrowing disbursement with the lowest interest rate of 4.45% per annum and *availability period* up to December 31, 2020. The principal installments of the fund borrowings are paid on the 10th (tenth) of each month along with the interest payments, where the first installment of the principal paid on February 10, 2021, amounted to Rp157,003 until maturity. The bank does not provide any guarantee for this fund borrowings.

The significant covenants in this fund borrowings agreement, among others, before obtaining written approvals, the Bank is not allowed to:

- Filed for bankruptcy;
- Transfer and/or hand over to other parties, the rights and obligations arising from this agreement;
- Binding as a guarantor or insurer of debt and guaranting the assets of the Bank;
- Using the fund borrowings facility not suitable with its purpose.

The Management of the Bank believed that all covenants required have been complied with.

24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI

- a) Rincian estimasi kerugian atas transaksi komitmen dan kontinjensi yang mempunyai risiko kredit adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Rupiah		
Fasilitas kredit yang belum ditarik	27.946.206	10.891.445
Garansi yang diterbitkan	67.273	42.508
	28.013.479	10.933.953
Dolar Amerika Serikat		
Fasilitas kredit yang belum ditarik	232.596	116.412
L/C yang tidak dapat dibatalkan		
yang masih berjalan	1.898	27.319
Garansi yang diterbitkan	-	1.608
	234.494	145.339
Total	28.247.973	11.079.292

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES

- a) The details of estimated losses on commitment and contingencies transactions that carry credit risk are as follows:

Rupiah
Unused loan facilities
Guarantees issued

United States Dollar
Unused loan facilities

Irrevocable L/C
Guarantees issued

Total

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

- b) Rincian transaksi komitmen dan kontinjensi diluar fasilitas kredit yang belum ditarik:

	31 Desember/December 31, 2021	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Pihak ketiga		
Rupiah		
Garansi yang diterbitkan		4.849.123
		4.849.123
Dolar Amerika Serikat		
Garansi yang diterbitkan		-
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	143.768	2.049.054
		2.049.054
		6.898.177
Pihak berelasi (Catatan 35)		
Rupiah		
Garansi yang diterbitkan		972.887
Total		7.871.064
Cadangan kerugian penurunan nilai		(69.172)
Neto		7.801.892

- c) Rincian transaksi komitmen dan kontinjensi berdasarkan kolektibilitas diluar fasilitas kredit yang belum ditarik

Pada tanggal-tanggal 31 Desember 2021 dan 2020, seluruh transaksi komitmen dan kontinjensi diluar fasilitas kredit yang belum ditarik diklasifikasikan "lancar".

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- b) The details of commitments and contingencies transactions excluding unused loan facilities:

	31 Desember/December 31, 2020		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	
Third parties			
Rupiah			
Guarantees issued		57.195.107	
		57.195.107	
United States Dollar			
Guarantees issued	78.408	1.101.632	
Irrevocable L/C	1.019.840	14.328.754	
		15.430.386	
		72.625.493	
Third parties (Note 35)			
Rupiah			
Guarantees issued		283.883	
Total		72.909.376	
Allowance for impairment losses		(71.435)	
Net		72.837.941	

- c) The details of commitments and contingencies transactions excluding unused loan facilities by collectibility

As of December 31, 2021 and 2020, all commitments and contingencies transactions excluding unused loan facilities were classified as "current".

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangkan impor yang diukur pada biaya perolehan diamortisasi					Irrevocable L/C measured at amortized cost
Nilai tercatat awal	14.328.754	-	-	14.328.754	Beginning carrying amount
Pengukuran kembali bersih nilai tercatat	7.869.305	-	-	7.869.305	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	10.838.830	-	-	10.838.830	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(30.987.835)	-	-	(30.987.835)	Derecognized financial assets
Nilai tercatat akhir	2.049.054	-	-	2.049.054	Ending carrying amount
31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangkan impor yang diukur pada biaya perolehan diamortisasi					Irrevocable L/C measured at amortized cost
Nilai tercatat awal	20.529.274	-	-	20.529.274	Beginning carrying amount
Pengukuran kembali bersih nilai tercatat	(11.085.130)	-	-	(11.085.130)	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	13.021.737	-	-	13.021.737	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(8.152.709)	-	-	(8.152.709)	Derecognized financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	15.582	-	-	15.582	Changes in foreign exchange models or parameters and other changes
Nilai tercatat akhir	14.328.754	-	-	14.328.754	Ending carrying amount

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangkai impor yang diukur pada biaya perolehan diamortisasi					Irrevocable L/C measured at amortized cost
Saldo awal tahun	27.319	-	-	27.319	Balance at the beginning of the year
Pengukuran kembali bersih penyisihan	(31.688)	-	-	(31.688)	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	7.335	-	-	7.335	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(27.241)	-	-	(27.241)	Derecognized financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	26.173	-	-	26.173	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	1.898	-	-	1.898	Allowance for ending expected credit losses
31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangkai impor yang diukur pada biaya perolehan diamortisasi					Irrevocable L/C measured at amortized cost
Saldo awal tahun	-	-	-	-	Balance at the beginning of the year
Dampak penerapan awal PSAK 71	9.895	-	-	9.895	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	9.895	-	-	9.895	Allowance for initial expected credit losses SFAS 71
Pengukuran kembali bersih penyisihan	(396)	-	-	(396)	Net remeasurement of allowance for losses

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangkai impor yang diukur pada biaya perolehan diamortisasi (lanjutan)					Irrevocable L/C measured at amortized cost (continued)
Aset keuangan baru yang diterbitkan atau dibeli	19.579	-	-	19.579	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(1.852)	-	-	(1.852)	Derecognized financial assets
Perubahan model atau parameter valuta asing dan perubahan lain	93	-	-	93	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	27.319	-	-	27.319	Allowance for ending expected credit losses
31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Garansi yang diterbitkan yang diukur pada biaya perolehan diamortisasi					Guarantees issued measured at amortized cost
Nilai tercatat awal	58.580.622	-	-	58.580.622	Beginning carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	3.845.760	-	-	3.845.760	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(56.604.372)	-	-	(56.604.372)	Derecognized financial assets
Nilai tercatat akhir	5.822.010	-	-	5.822.010	Ending carrying amount

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Garansi yang diterbitkan yang diukur pada biaya perolehan diamortisasi					Guarantees issued measured at amortized cost
Nilai tercatat awal	8.156.524	1.000.000	-	9.156.524	Beginning carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	58.330.622	-	-	58.330.622	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(7.906.524)	(1.000.000)	-	(8.906.524)	Derecognized financial assets
Nilai tercatat akhir	58.580.622	-	-	58.580.622	Ending carrying amount
31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Garansi yang diterbitkan yang diukur pada biaya perolehan diamortisasi					Guarantees issued measured at amortized cost
Saldo awal tahun	44.115	-	-	44.115	Balance at the beginning of the year
Pengukuran kembali bersih penyisihan	573	-	-	573	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	22.921	-	-	22.921	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(336)	-	-	(336)	Derecognized financial assets
Cadangan atas kerugian kredit ekspektasian akhir	67.273	-	-	67.273	Allowance for ending expected credit losses

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Garansi yang diterbitkan yang diukur pada biaya perolehan diamortisasi					Guarantees issued measured at amortized cost
Saldo awal tahun	-	-	-	-	- Balance at the beginning of the year
Dampak penerapan awal PSAK 71	5.544	54.388	-	59.932	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	5.544	54.388	-	59.932	Allowance for initial expected credit losses SFAS 71
Pengukuran kembali bersih penyisihan	67	-	-	67	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	43.966	-	-	43.966	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(5.461)	(54.388)	-	(59.849)	Derecognized financial assets
Cadangan atas kerugian kredit ekspektasian akhir	44.116	-	-	44.116	Allowance for ending expected credit losses
31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Fasilitas kredit yang belum ditarik yang diukur pada biaya perolehan diamortisasi					Unused loan facility measured at amortized cost
Nilai tercatat awal	880.867.177	61.821.964	-	942.689.141	Beginning carrying amount
Pengalihan ke					Transfer to
Stage 1	8.276	(8.276)	-	-	Stage 1
Stage 2	(214.990)	215.024	-	34	Stage 2
Stage 3	(3.724.830)	73	-	(3.724.903)	Stage 3
Pengukuran kembali bersih nilai tercatat	69.324.445	11.493.657	-	80.818.102	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	13.862.525	1.620	-	13.864.145	New financial asset issued or purchased

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Fasilitas kredit yang belum ditarik yang diukur pada biaya perolehan diamortisasi (lanjutan)					Unused loan facility measured at amortized cost (continued)
Aset keuangan yang dihentikan pengakuannya	(427.647.955)	(20.543.043)	-	(448.190.998)	Derecognized financial assets
Penghapusbukuan	-	-	-	-	Write-off
Perubahan model atau parameter valuta asing dan perubahan lain	908.575	-	-	908.575	Changes in foreign exchange models or parameters and other changes
Nilai tercatat akhir	533.383.222	52.980.872	-	586.364.094	Ending carrying amount
31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Fasilitas kredit yang belum ditarik yang diukur pada biaya perolehan diamortisasi					Unused loan facility measured at amortized cost
Nilai tercatat awal	1.169.319.385	120.244.801	-	1.289.564.186	Beginning carrying amount
Pengalihan ke					Transfer to
Stage 1	1.493.769	(1.493.769)	-	-	Stage 1
Stage 2	(7.076.819)	7.076.819	-	-	Stage 2
Stage 3	-	-	-	-	Stage 3
Pengukuran kembali bersih nilai tercatat	28.345.646	(10.609.771)	-	17.735.875	Net remeasurement of carrying amount
Aset keuangan baru yang diterbitkan atau dibeli	116.305.908	6.187.561	-	122.493.469	New financial asset issued or purchase
Aset keuangan yang dihentikan pengakuannya	(428.032.814)	(59.331.593)	-	(487.364.407)	Derecognized financial assets
Penghapusbukuan	(28.870)	(252.084)	-	(280.954)	Write-off
Perubahan model atau parameter valuta asing dan perubahan lain	540.971	-	-	540.971	Changes in foreign exchange models or parameters and other changes
Nilai tercatat akhir	880.867.176	61.821.964	-	942.689.140	Ending carrying amount

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24. ESTIMASI KERUGIAN KOMITMEN DAN KONTINJENSI (lanjutan)

- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2021					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umumnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umumnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Fasilitas kredit yang belum ditarik yang diukur pada biaya perolehan diamortisasi					Unused loan facility measured at amortized cost
Saldo awal tahun	8.857.122	2.150.735	-	11.007.857	Balance at the beginning of the year
Pengalihan ke					Transfer to
Stage 1	8.871.265	26	-	8.871.291	Stage 1
Stage 2	-	22.585.679	-	22.585.679	Stage 2
Stage 3	-	-	-	-	Stage 3
Pengukuran kembali bersih penyisihan	(893.326)	1.802.165		908.839	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	780.120	2.816	-	782.936	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(12.460.273)	(3.522.773)	-	(15.983.046)	Derecognized financial assets
Penghapusbukuan	-	-	-	-	Write-off
Perubahan model atau parameter valuta asing dan perubahan lain	5.246	-	-	5.246	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	5.160.154	23.018.648	-	28.178.802	Allowance for ending expected credit losses
31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umumnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umumnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Fasilitas kredit yang belum ditarik yang diukur pada biaya perolehan diamortisasi					Unused loan facility measured at amortized cost
Saldo awal tahun	-	-	-	-	Balance at the beginning of the year
Dampak penerapan awal PSAK 71	6.584.244	3.825.712	-	10.409.956	Impact on initial adoption of SFAS 71
Cadangan atas kerugian kredit ekspektasian awal PSAK 71	6.584.244	3.825.712	-	10.409.956	Allowance for initial expected credit losses SFAS 71

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- d) Tabel berikut menyajikan perubahan nilai tercatat bruto dan cadangan kerugian ekspektasian berdasarkan kategori instrumen keuangan (lanjutan):

24. ESTIMATED LOSSES ON COMMITMENT AND CONTINGENCIES (continued)

- d) The following table presents the changes in gross carrying amount and allowance for expected losses by financial instrument category (continued):

31 Desember/December 31, 2020					
	Stage 1 - kerugian kredit ekspektasian 12 bulan/ Stage 1 - 12 months expected credit loss	Stage 2 - kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Stage 2 - lifetime expected credit loss - not credit impaired	Stage 3 - kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Stage 3 - lifetime expected credit loss - credit impaired	Total	
Fasilitas kredit yang belum ditarik yang diukur pada biaya perolehan diamortisasi (lanjutan)					Unused loan facility measured at amortized cost (continued)
Pengalihan ke					Transfer to
Stage 1	6.412	(6.412)	-	-	Stage 1
Stage 2	(110.552)	110.552	-	-	Stage 2
Stage 3	-	-	-	-	Stage 3
Pengukuran kembali bersih penyisihan	1.475.368	(106.275)		1.369.093	Net remeasurement of allowance for losses
Aset keuangan baru yang diterbitkan atau dibeli	4.428.943	143.461	-	4.572.404	New financial asset issued or purchased
Aset keuangan yang dihentikan pengakuannya	(3.525.056)	(1.816.076)	-	(5.341.132)	Derecognized financial assets
Penghapusbukuan	(825)	(227)	-	(1.052)	Write-off
Perubahan model atau parameter valuta asing dan perubahan lain	(1.412)	-	-	(1.412)	Changes in foreign exchange models or parameters and other changes
Cadangan atas kerugian kredit ekspektasian akhir	8.857.122	2.150.735	-	11.007.857	Allowance for ending expected credit losses

Bank melakukan penilaian atas transaksi komitmen dan kontinjensi yang mempunyai risiko kredit secara kolektif dan individual dengan menggunakan bukti objektif.

The Bank assesses commitments and contingent transactions that have credit risk collectively and individually using objective evidence.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai pada tanggal-tanggal 31 Desember 2021 dan 2020.

Management believes that the allowance for impairment losses is adequate as of December 31, 2021 and 2020.

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25. LIABILITAS IMBALAN KERJA

Liabilitas imbalan kerja terdiri atas:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pemutusan hubungan kerja	54.298.938	40.831.373
Cuti besar	4.210.382	4.735.667
Penghargaan masa kerja	737.641	807.677
Kompensasi perjanjian kerja waktu tertentu	814.963	-
Total	60.061.924	46.374.717

Perhitungan aktuaria atas program pemutusan hubungan kerja, cuti besar, penghargaan masa kerja dan kompensasi perjanjian kerja waktu tertentu pada tanggal-tanggal 31 Desember 2021 dan 2020 dilakukan oleh KKA Enny Diah Awal (dahulu PT Bestama Aktuaria), aktuaris independen, dalam laporannya masing-masing tertanggal 3 Januari 2022 dan 11 Februari 2021.

a) Pemutusan Hubungan Kerja (PHK)

Program imbalan pasca kerja Bank disebut dengan Program Pemutusan Hubungan Kerja (PHK). Perhitungan PHK dilakukan dengan menggunakan asumsi-asumsi penilaian aktuaria atas liabilitas Bank berkaitan dengan cadangan untuk penetapan uang pesangon, uang penghargaan tanda jasa dan ganti kerugian sesuai dengan Undang-undang Ketenagakerjaan No. 13 Tahun 2003 (UU No.13/2003) tanggal 25 Maret 2003.

Perhitungan aktuaria tersebut dilakukan dengan menggunakan metode *Projected Unit Credit* serta mempertimbangkan asumsi-asumsi sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Tingkat diskonto tahunan	7,6%	7,5%
Tingkat kenaikan upah tahunan di masa depan	7,0%	7,0%
Tingkat kematian	TMI 2019	TMI 2019
Tingkat cacat	10% dari TMI 2019	10% dari TMI 2019
Usia pensiun normal	56 tahun	56 tahun

25. LIABILITIES FOR EMPLOYEE BENEFITS

Liabilities for employee benefits consist of:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Pemutusan hubungan kerja	54.298.938	40.831.373
Cuti besar	4.210.382	4.735.667
Penghargaan masa kerja	737.641	807.677
Kompensasi perjanjian kerja waktu tertentu	814.963	-
Total	60.061.924	46.374.717

The actuarial calculation for work separation scheme, grand leaves, gratuity for service and certain time employment agreement compensation as of December 31, 2021 and 2020 was prepared by KKA Enny Diah Awal (formerly PT Bestama Aktuaria), an independent actuary, in its reports dated January 3, 2022 and February 11, 2021, respectively.

a) Work Separation Scheme (PHK)

Post-employment benefits program in the Bank called by Work Separation Scheme Program (PHK). The PHK is calculated using the actuarial valuation assumptions on the Bank's liability related to the allowance for severance, gratuity and compensation benefits in accordance with Labor Law No. 13 Year 2003 (UU No. 13/2003) dated March 25, 2003.

The above actuarial calculations are calculated using the Projected Unit Credit method with the following assumptions:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Tingkat diskonto tahunan	7,6%	7,5%
Tingkat kenaikan upah tahunan di masa depan	7,0%	7,0%
Tingkat kematian	TMI 2019	TMI 2019
Tingkat cacat	10% dari TMI 2019	10% dari TMI 2019
Usia pensiun normal	56 tahun	56 tahun

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25. LIABILITAS IMBALAN KERJA (lanjutan)

a) Pemutusan Hubungan Kerja (PHK) (lanjutan)

Mutasi atas liabilitas PHK masing-masing pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Saldo awal	40.831.373	38.807.320
Beban yang diakui pada tahun berjalan (Catatan 31)	14.777.874	5.798.251
Pengukuran kembali atas liabilitas PHK	9.458.871	601.318
Pembayaran manfaat aktual	(10.769.180)	(4.375.516)
Liabilitas PHK	54.298.938	40.831.373

Pengukuran kembali atas liabilitas PHK masing-masing pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Saldo awal	(4.723.215)	(5.324.533)
Kerugian aktuarial	9.458.871	601.318
Pengukuran kembali atas liabilitas PHK	4.735.656	(4.723.215)

Perhitungan beban PHK untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020 sesuai dengan perhitungan aktuarial adalah sebagai berikut:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Biaya jasa kini	5.396.827	3.249.878
Biaya bunga	2.658.509	2.548.373
Beban pesangon	6.722.538	-
Beban PHK (Catatan 31)	14.777.874	5.798.251

25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

a) Work Separation Scheme (PHK) (continued)

The movements of liabilities for PHK as of December 31, 2021 and 2020, respectively, are as follows:

Beginning balance
Expense recognized in the current year (Note 31)
Remeasurement on liabilities for PHK
Actual benefit payments
Liabilities for PHK

Remeasurement of liabilities for PHK as of December 31, 2021 and 2020, respectively, are as follows:

Beginning balance
Actuarial loss
Remeasurement on liabilities for PHK

The calculation of PHK expenses for the years period ended December 31, 2021 and 2020, based on actuarial calculation are as follows:

Current service cost
Interest cost
Severance expense
PHK expense (Note 31)

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25. LIABILITAS IMBALAN KERJA (lanjutan)

a) Pemutusan Hubungan Kerja (PHK) (lanjutan)

Mutasi nilai kini liabilitas PHK adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Saldo awal	40.831.373	38.807.320
Biaya jasa kini	5.396.827	3.249.878
Biaya bunga	2.658.509	2.548.373
Beban pesangon	6.722.538	-
Kerugian aktuarial	9.458.871	601.318
Pembayaran manfaat	(10.769.180)	(4.375.516)
Nilai kini liabilitas PHK	54.298.938	40.831.373

Analisis sensitivitas untuk asumsi aktuarial liabilitas PHK adalah sebagai berikut (tidak diaudit):

	31 Desember/December 31, 2021	
	Perubahan persentase/ Change in percentage	Nilai kini atas liabilitas PHK/ Present value of PHK liabilities
Tingkat diskonto	+1,0%	48.658.670
	-1,0%	60.941.482
Tingkat kenaikan upah	+1,0%	61.222.274
	-1,0%	48.319.955

Jadwal jatuh tempo dari liabilitas PHK pada tahun mendatang adalah sebagai berikut (tidak diaudit):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
< 1 tahun	4.350.198	2.090.319
≥ 1 tahun - 5 tahun	24.869.193	15.678.128
≥ 5 tahun	553.344.252	424.615.749
Total	582.563.643	442.384.196

25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

a) Work Separation Scheme (PHK) (continued)

The movements in the present value of liabilities for PHK are as follows:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Beginning balance	40.831.373	38.807.320	Beginning balance
Current service cost	5.396.827	3.249.878	Current service cost
Interest cost	2.658.509	2.548.373	Interest cost
Severance expense	6.722.538	-	Severance expense
Actuarial loss	9.458.871	601.318	Actuarial loss
Benefit payment	(10.769.180)	(4.375.516)	Benefit payment
Present value of liabilities for PHK	54.298.938	40.831.373	Present value of liabilities for PHK

The sensitivity analysis for actuarial assumptions of liabilities for PHK are as follows (unaudited):

	31 Desember/December 31, 2021		
	Perubahan persentase/ Change in percentage	Nilai kini atas liabilitas PHK/ Present value of PHK liabilities	
Discount rate	+0,5%	38.396.362	Discount rate
	-0,5%	43.476.108	
Salary increase rate	+0,5%	43.476.108	Salary increase rate
	-0,5%	38.374.456	

The maturity profile of liabilities for PHK in future years are as follows (unaudited):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
< 1 year	4.350.198	2.090.319	< 1 year
≥ 1 year - 5 years	24.869.193	15.678.128	≥ 1 year - 5 years
≥ 5 years	553.344.252	424.615.749	≥ 5 years
Total	582.563.643	442.384.196	Total

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25. LIABILITAS IMBALAN KERJA (lanjutan)

25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

b) Cuti besar

b) Grand leaves

Perhitungan aktuaria atas cuti besar dilakukan dengan menggunakan metode *Projected Unit Credit* serta mempertimbangkan asumsi-asumsi sebagai berikut:

The actuarial calculation for grand leaves are calculated using the *Projected Unit Credit* method with the following assumptions:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Tingkat diskonto tahunan	4,7%	4,8%	Annual discount rate
Tingkat kenaikan gaji tahunan di masa depan	7,0%	7,0%	Annual future salary's growth rate
Tingkat kematian	TMI 2019	TMI 2019	Mortality rate
Tingkat cacat	10% dari TMI 2019	10% dari TMI 2019	Disability rate

Mutasi liabilitas atas cuti besar masing-masing pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

The movements of liabilities for grand leaves as of December 31, 2021 and 2020, respectively, are as follows:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Saldo awal	4.735.667	3.746.816	Beginning balance
Beban yang diakui tahun berjalan (Catatan 31)	725.615	1.919.251	Expense recognized in the current year (Note 31)
Pembayaran manfaat aktual	(1.250.900)	(930.400)	Actual benefit payments
Liabilitas cuti besar	4.210.382	4.735.667	Liabilities for grand leaves

Beban cuti besar untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020 berdasarkan perhitungan aktuaria adalah sebagai berikut:

Grand leaves expense for the years ended December 31, 2021 and 2020, based on actuarial calculation are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Biaya jasa kini	1.206.951	1.308.686	Current service cost
Beban bunga	197.290	203.460	Interest expense
(Keuntungan) kerugian aktuaria	(678.626)	407.105	Actuarial (gain) loss
Beban cuti besar (Catatan 31)	725.615	1.919.251	Grand leaves expense (Note 31)

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25. LIABILITAS IMBALAN KERJA (lanjutan)

b) Cuti besar (lanjutan)

Analisis sensitivitas untuk asumsi aktuarial liabilitas cuti besar adalah sebagai berikut (tidak diaudit):

	31 Desember/December 31, 2021	
	Perubahan persentase/ Change in percentage	Nilai kini atas liabilitas cuti besar/ Present value of liabilities for grand leaves
Tingkat diskonto	+1,0%	3.329.402
	-1,0%	3.473.903
Tingkat kenaikan upah	+1,0%	3.471.604
	-1,0%	3.330.252

Jadwal jatuh tempo dari liabilitas cuti besar pada tahun mendatang adalah sebagai berikut (tidak diaudit):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
≤ 1 tahun	1.088.036	2.351.764
≥ 1 - 5 tahun	5.682.188	5.615.105
≥ 5 tahun	2.213.560	2.124.570
Total	8.983.784	10.091.439

c) Penghargaan masa kerja

Perhitungan aktuarial atas penghargaan masa kerja dilakukan dengan menggunakan metode *Projected Unit Credit* serta mempertimbangkan asumsi-asumsi sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Tingkat diskonto tahunan	4,4%	4,7%
Tingkat kenaikan gaji tahunan di masa depan	7,0%	7,0%
Tingkat kenaikan harga emas	8,0%	8,0%
Tingkat kematian	TMI 2019	TMI 2019
Tingkat cacat	10% dari TMI 2019	10% dari TMI 2019

25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

b) Grand leaves (continued)

Sensitivity analysis for actuarial assumptions of liabilities for grand leaves are as follows (unaudited):

	31 Desember/December 31, 2020	
	Perubahan persentase/ Change in percentage	Nilai kini atas liabilitas cuti besar/ Present value of liabilities for grand leaves
	+0,5%	4.699.480
	-0,5%	4.772.566
	+0,5%	4.771.631
	-0,5%	4.700.052

The maturity profile of liabilities for grand leaves in future years are as follows (unaudited):

	31 Desember/ December 31, 2020	
	2.351.764	≤ 1 year
	5.615.105	≥ 1 year - 5 years
	2.124.570	≥ 5 years
Total	10.091.439	Total

c) Gratuity for services

The actuarial calculation of gratuity for services are calculated using the *Projected Unit Credit* method with the following assumptions:

	31 Desember/ December 31, 2020	
	4,7%	Annual discount rate
	7,0%	Annual future salary's growth rate
	8,0%	Gold price growth rate
	TMI 2019	Mortality rate
	10% dari TMI 2019	Disability rate

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25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

c) Penghargaan masa kerja (lanjutan)

c) *Gratuity for services (continued)*

Mutasi untuk liabilitas atas penghargaan masa kerja pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

The movements of liabilities for gratuity for services as of December 31, 2021 and 2020 are as follows:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Saldo awal	807.677	592.197	<i>Beginning balance</i>
Beban yang diakui tahun berjalan (Catatan 31)	277.209	321.480	<i>Expense recognized in the current year (Note 31)</i>
Pembayaran manfaat aktual	(347.245)	(106.000)	<i>Actual Benefit payments</i>
Liabilitas penghargaan masa kerja	737.641	807.677	<i>Liabilities for gratuity for services</i>

Beban penghargaan masa kerja untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 berdasarkan perhitungan aktuarial adalah sebagai berikut:

Gratuity for services expense for the year ended December 31, 2021 and 2020 based on actuarial calculation are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Biaya jasa kini	274.345	247.895	<i>Current service cost</i>
Beban bunga	29.801	33.430	<i>Interest Expense</i>
Kerugian aktuarial	(26.937)	40.155	<i>Actuarial loss</i>
Beban penghargaan masa kerja (Catatan 31)	277.209	321.480	<i>Gratuity for services expense (Note 31)</i>

Analisis sensitivitas untuk asumsi aktuarial liabilitas penghargaan masa kerja adalah sebagai berikut (tidak diaudit):

Sensitivity analysis for actuarial assumptions of liabilities for gratuity for services are as follows (unaudited):

	31 Desember/December 31, 2021		31 Desember/December 31, 2020		
	Perubahan persentase/ Change in percentage	Nilai kini atas liabilitas penghargaan masa kerja/ Present value of liabilities for gratuity for services	Perubahan persentase/ Change in percentage	Nilai kini atas liabilitas penghargaan masa kerja/ Present value of liabilities for gratuity for services	
Tingkat diskonto	+1,0%	725.858	+0,5%	802.278	<i>Discount rate</i>
	-1,0%	749.868	-0,5%	813.169	
Tingkat kenaikan upah	+1,0%	749.453	+0,5%	813.025	<i>Salary increase rate</i>
	-1,0%	726.032	-0,5%	802.368	

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25. LIABILITAS IMBALAN KERJA (lanjutan)

25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

c) Penghargaan masa kerja (lanjutan)

c) *Gratuity for services (continued)*

Jadwal jatuh tempo dari liabilitas penghargaan masa kerja pada tahun mendatang adalah sebagai berikut (tidak diaudit):

The maturity profile of liabilities for gratuity for services in future years are as follows (unaudited):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
≤ 1 tahun	369.727	420.827	≤ 1 year
≥ 1 - 5 tahun	1.420.625	1.711.916	≥ 1 year - 5 years
Total	1.790.352	2.132.743	Total

d) Kompensasi perjanjian kerja waktu tertentu

d) *Certain time employment agreement compensation*

Perhitungan kompensasi Perjanjian Kerja Waktu Tertentu (PKWT) dilakukan dengan menggunakan metode proporsional serta mempertimbangkan asumsi-asumsi sebagai berikut:

The actuarial calculation for certain time employment agreement compensation (PKWT) are calculated using the Proportional method with the following assumptions:

	31 Desember/ December 31, 2021	
Tingkat kenaikan gaji tahunan di masa depan	7,0%	Annual future salary's growth rate

Mutasi untuk liabilitas kompensasi PKWT pada tanggal 31 Desember 2021 adalah sebagai berikut:

The movements of allowance for PKWT compensation as of December 31, 2021 are as follows:

	31 Desember/ December 31, 2021	
Saldo awal	-	Beginning balance
Beban yang diakui tahun berjalan (Catatan 31)	997.916	Expense recognized in the current year (Note 31)
Pengukuran kembali atas liabilitas kompensasi PKWT	(116.485)	Remeasurement on liabilities for PKWT compensation
Pembayaran manfaat aktual	(66.468)	Actual Benefit payments
Liabilitas PKWT	814.963	Liabilities for PKWT

Pengukuran kembali atas liabilitas kompensasi PKWT pada tanggal 31 Desember 2021 adalah sebagai berikut:

Remeasurement of liabilities for PKWT compensation as of December 31, 2021 are as follows:

	31 Desember/ December 31, 2021	
Saldo awal	-	Beginning balance
Keuntungan aktuarial	116.485	Actuarial gain
Pengukuran kembali atas liabilitas kompensasi PKWT	116.485	Remeasurement on liabilities for PKWT compensation

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25. LIABILITAS IMBALAN KERJA (lanjutan)

- d) Kompensasi perjanjian kerja waktu tertentu (lanjutan)

Beban kompensasi PKWT untuk tahun yang berakhir pada tanggal 31 Desember 2021 berdasarkan perhitungan aktuarial adalah sebagai berikut:

	Tahun yang Berakhir pada Tanggal 31 Desember 2021/ For the Year Ended December 31, 2021
Biaya jasa kini	705.951
Biaya jasa lalu	291.965
Beban kompensasi PKWT (Catatan 31)	997.916

Jadwal jatuh tempo dari liabilitas kompensasi perjanjian kerja waktu tertentu pada tahun mendatang adalah sebagai berikut (tidak diaudit):

	31 Desember/ December 31, 2021
≤ 1 tahun	895.554
≥ 1 - 5 tahun	219.835
Total	1.115.389

- e) Program pensiun iuran pasti

Bank menyelenggarakan program pensiun iuran pasti untuk seluruh karyawan tetapnya yang dikelola oleh Dana Pensiun Lembaga Keuangan (DPLK) PT Bank Rakyat Indonesia (Persero) Tbk.

Jumlah kontribusi Bank untuk dana pensiun adalah sebesar 84,97% dari iuran yang sudah ditetapkan berdasarkan tingkat dari masing-masing karyawan yang disajikan sebagai bagian dari "Beban Gaji dan Tunjangan" dalam laporan laba rugi dan penghasilan komprehensif lain.

Untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 besaran iuran yang telah dibayarkan oleh Bank masing-masing sebesar Rp876.614 dan Rp810.928 (Catatan 31).

25. LIABILITIES FOR EMPLOYEE BENEFITS (continued)

- d) Certain time employment agreement compensation (continued)

PKWT compensation expense for the year ended December 31, 2021 based on actuarial calculation are as follows:

Current service cost
Past service cost
PKWT compensation expense (Note 31)

The maturity profile of certain time employment agreement compensation liability in future years are as follows (unaudited):

≤ 1 year
≥ 1 year - 5 years
Total

- e) Defined contribution pension plan

The Bank defined contribution pension plan for all of its permanent employees is managed by Dana Pensiun Lembaga Keuangan (DPLK) PT Bank Rakyat Indonesia (Persero) Tbk.

The Bank's contribution for pension plan is 84.97% of predetermined contribution based on the level of each employee, which presented as part of "Salaries and Allowances Expense" in the statement of profit or loss and other comprehensive income.

For the year ended December 31, 2021 and 2020 the contribution that has been paid by the Bank amounted to Rp876,614 and Rp810,928, respectively (Note 31).

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26. LIABILITAS LAIN-LAIN

	31 Desember/December 31, 2021	
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent
Rupiah		
Rekening penampungan Kredit Program		77.095.528
Bonus dan tantiem		-
Insentif dan tunjangan kerja		25.163.639
Bunga yang masih harus dibayar		20.344.901
Cadangan perkara (Catatan 40)		13.129.112
Rekening kontrol pinjaman		5.924.891
Liabilitas sewa		2.841.087
Setoran jaminan		49.550
Pendapatan diterima dimuka		13.384
Lain-lain		6.321.264
		<u>150.883.356</u>
Dolar Amerika Serikat		
Bunga yang masih harus dibayar	35.205	501.754
Lain-lain	73.351	1.045.432
		<u>1.547.186</u>
Total		<u>152.430.542</u>

Rekening penampungan Kredit Program merupakan rekening penampungan angsuran atas penyaluran pembiayaan perumahan yang akan disetorkan kepada Pemerintah Republik Indonesia. Bank bekerja sama dengan Kementerian Pekerjaan Umum dan Perumahan Rakyat (Kemenpupera) Republik Indonesia dalam penyaluran dana Fasilitas Likuiditas Pembiayaan Perumahan (FLPP) dalam rangka perolehan rumah melalui KPR Sejahtera bagi masyarakat berpenghasilan rendah. Sesuai dengan Perjanjian Kerjasama Operasi (PKO) antara Pusat Pengelolaan Dana Pembiayaan Perumahan (PPDPP) Kemenpupera dengan Bank No. 14/PKS/Pg/2020, komposisi *sharing* pembiayaan tersebut adalah sebesar 25% dana Bank dan 75% dana Kemenpupera.

Transaksi kepada pihak berelasi disajikan pada Catatan 35.

26. OTHER LIABILITIES

	31 Desember/December 31, 2020		
	Jumlah nosional mata uang asing/ Notional amount foreign currency (Angka penuh/ Full amount)	Ekuivalen Rupiah/ Rupiah Equivalent	
			Rupiah
			Program Loans
			escrow account
			Bonuses and tantiem
			Incentives and work allowances
			Interest payables
			Provision for litigation (Note 40)
			Loans control account
			Lease liabilities
			Guarantee deposits
			Unearned income
			Others
			United States Dollar
			Interest payables
			Others
			Total

The Program Loan escrow account is an installment escrow account for the distribution of housing loans that will be paid to the Government of the Republic of Indonesia. The Bank cooperates with the Ministry of Public Works and People's Housing (Kemenpupera) in distributing Liquidity Facility of Housing Loans (FLPP) funds in order to finance house through KPR Sejahtera for low-income communities. In accordance with the Operating Cooperation Agreement (PKO) between the Center for Housing Financing Fund Management (PPDPP) Ministry of Public Works and People's Housing of Kemenpupera with the Bank No. 14/PKS/Pg/2020, the composition of sharing financing are 25% of the Bank's funds and 75% of Kemenpupera funds.

Transactions with related parties is presented in Note 35.

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27. EKUITAS

Modal saham

Rincian pemegang saham Bank dan kepemilikannya pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

31 Desember/December 31, 2021				
Pemegang saham	Total lembar saham ditempatkan dan disetor penuh/ Number of shares issued and fully paid	Persentase kepemilikan/ Percentage of ownership	Total	Shareholders
PT Bank Rakyat Indonesia (Persero) Tbk	19.498.475.601	85,721%	1.949.847.560	PT Bank Rakyat Indonesia (Persero) Tbk
Direksi				Board of Directors
Ernawan	6.318.321	2,778%	631.832	Ernawan
Sigit Murtiyoso	6.318.741	2,778%	631.874	Sigit Murtiyoso
Kaspar Situmorang	3.003.336	1,320%	300.334	Kaspar Situmorang
Arif Wicaksono	2.552.642	1,122%	255.264	Arif Wicaksono
Bhimo Wikan Hantoro	2.552.642	1,122%	255.264	Bhimo Wikan Hantoro
Masyarakat (masing-masing dibawah 5%)	3.227.305.429	5,159%	322.730.543	Public (each below 5%)
Total	22.746.526.712	100,000%	2.274.652.671	Total
31 Desember/December 31, 2020				
Pemegang saham	Total lembar saham ditempatkan dan disetor penuh/ Number of shares issued and fully paid	Persentase kepemilikan/ Percentage of ownership	Total	Shareholders
PT Bank Rakyat Indonesia (Persero) Tbk	18.589.384.692	87,10%	1.858.938.469	PT Bank Rakyat Indonesia (Persero) Tbk
Dana Pensiun Perkebunan	1.067.641.475	5,00%	106.764.148	Dana Pensiun Perkebunan
Direksi				Board of Directors
Ebeneser Girsang	1.810.200	0,01%	181.020	Ebeneser Girsang
Masyarakat (masing-masing dibawah 5%)	1.684.453.863	7,89%	168.445.386	Public (each below 5%)
Total	21.343.290.230	100,00%	2.134.329.023	Total

Penerbitan saham baru

Berdasarkan Akta Pernyataan Keputusan Rapat No. 24, Notaris M. Nova Faisal, S.H., M.Kn. di Jakarta, yang telah diterima dan dicatat di dalam Sistem Administrasi Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0052731.AH.01.02.TAHUN 2021 tanggal 27 September 2021, mengenai peningkatan modal ditempatkan dan disetor penuh yang berasal dari Penawaran Umum Terbatas IX (PUT IX) sebanyak 1.054.545.185 saham, sehingga jumlah modal ditempatkan dan disetor penuh Bank menjadi 22.746.526.712 saham dengan total sebesar Rp2.274.652.671.200 (Rupiah penuh) (Catatan 1C).

Issuance of new shares

Based on the Deed of Meeting Resolution Statements No. 24, Notary M. Nova Faisal, S.H., M.Kn. in Jakarta, that has been received and recorded in the Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-0052731.AH.01.02.TAHUN 2021 dated September 27, 2021, regarding the issuance of issued and fully paid capital from the Limited Public Offering IX (PUT IX) of 1.054.545.185 shares, thereby increasing the issued and fully paid shares of the Bank to 22,746,526,712 shares amounted to Rp2,274,652,671,200 (full Rupiah) (Note 1C).

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27. EKUITAS

Tambahan modal disetor

Perubahan tambahan modal disetor untuk tahun yang berakhir pada tanggal 31 Desember 2021 berasal dari eksekusi opsi saham serta agio saham dan biaya emisi saham pada saat Penawaran Umum Terbatas IX (PUT IX). Sedangkan perubahan tambahan modal disetor untuk tahun yang berakhir pada tanggal 31 Desember 2020 berasal dari pembalikan cadangan opsi saham.

Perubahan tambahan modal disetor pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Saldo awal	1.827.438.716	1.825.177.644
Agio saham	1.108.426.536	-
Pembalikan cadangan opsi saham	17.048.507	2.261.072
Biaya emisi saham	(9.199.986)	-
Saldo akhir	2.943.713.773	1.827.438.716

General and administrative
Additional paid-in capital
Reversal of shares option allowance
Shares issuance cost
Ending balance

Opsi Saham

Berdasarkan Rapat Umum Pemegang Saham Luar Biasa yang tertuang dalam Akta No. 51 tanggal 26 Juni 2018, Bank menyetujui untuk menerbitkan hak opsi melalui Program *Management and Employee Stock Option Plan* (MESOP) untuk membeli saham baru Bank sebanyak-banyaknya 350.000.000 (tiga ratus lima puluh juta) saham.

Tujuan program ini untuk mendorong kepemilikan saham Bank oleh peserta program, menyelaraskan tujuan Bank dengan tujuan peserta program yang merupakan manajemen dan pekerja Bank, serta meningkatkan kinerjanya.

Bank menerbitkan program MESOP sejumlah 350.000.000 saham dalam 3 (tiga) tahap sebagai berikut:

- Tahap I (10 Desember 2018): 50% dari total saham atau sebanyak 175.000.000 saham
- Tahap II (1 April 2019): 30% dari total saham atau sebanyak 105.000.000 saham
- Tahap III (1 April 2020): 20% dari total saham atau sebanyak 70.000.000 saham

27. EQUITY

Additional paid-in capital

The movements of additional paid-in capital for the year ended December 31, 2021 resulting from the execution of shares option, additional paid-in capital and shares issuance cost in Limited Public Offering IX (PUT IX). Meanwhile the movements of additional paid-in capital for the year ended December 31, 2020 resulting from the reversal of shares option allowance.

The movements of additional paid-in capital as of December 31, 2021 and 2020, are as follows:

Shares Option

Based on Extraordinary General Shareholders' Meetings according to notarial deed No. 51 dated June 26, 2018, Bank agreed to issue the rights option through the Management and Employee Stock Option Plan (MESOP) Program to purchase Bank's new shares maximum of 350,000,000 (three hundred and fifty million) shares.

The objective of this program is to encounter Bank share ownership by program participants, align the Bank's objectives with program participants objective who are management and employees of the Bank and improve their performance.

Bank issued the MESOP program 350,000,000 shares in 3 (three) phases as follows:

- Grant I (December 10, 2018): 50% of total shares or 175,000,000 shares
- Grant II (April 1, 2019): 30% of total shares or 105,000,000 shares
- Grant III (April 1, 2020): 20% of total shares or 70,000,000 shares

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27. EKUITAS (lanjutan)

Opsi Saham (lanjutan)

Masa berlaku opsi adalah sejak tanggal pendistribusian sampai dengan 26 Juni 2023. Setelah tanggal tersebut, seluruh hak opsi yang tidak digunakan akan menjadi gugur.

Pihak yang memenuhi syarat untuk menerima MESOP adalah direksi, dewan komisaris kecuali komisaris independen dan karyawan tetap dengan mengacu kepada masa kerja, penilaian kinerja, kelompok jabatan dan jabatan.

Perhitungan, metode dan asumsi mengenai MESOP diperoleh dari laporan aktuaris independen Tahap I dan II, PT Bestama Aktuarial tertanggal 25 Januari 2019, 2 Juli 2019 dan 3 Juli 2020.

Beban kompensasi yang diakui dalam laporan laba rugi dan penghasilan komprehensif lainnya sehubungan dengan opsi saham untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 adalah sebesar Rp355.575 dan Rp6.460.219 (Catatan 31) dan dikreditkan ke opsi saham di ekuitas.

Nilai wajar dari setiap hak opsi diestimasi pada tanggal pemberian hak opsi dengan menggunakan model "Black-scholes", dengan asumsi utama sebagai berikut:

	Tahap/Grant I	Tahap/Grant II	Tahap/Grant III	
Periode <i>vesting</i> (dalam bulan)	12	12	12	<i>Vesting period (in month)</i>
Harga saham pada tanggal pemberian opsi (dalam Rupiah penuh)	304	318	96	<i>Shares price at grant date (in full Rupiah)</i>
Harga pelaksanaan opsi (dalam Rupiah penuh)	285	295	100	<i>Exercise price of option (in full Rupiah)</i>
Nilai wajar opsi (dalam Rupiah penuh)	72,28	62,44	21,02	<i>Option fair value (in full Rupiah)</i>
Volatilitas harga saham	37,60%	34,72%	55,80%	<i>Volatility of shares price</i>
Suku bunga bebas risiko	6,96%	6,45%	5,33%	<i>Risk-free interest rate</i>
Tingkat dividen	1,16%	1,12%	0,91%	<i>Dividend yield</i>

Eksekusi MESOP telah dilakukan oleh pekerja untuk MESOP Tahap I dan MESOP Tahap II mulai tanggal 1 April 2020 dan MESOP Tahap III mulai tanggal 1 April 2021.

Selama tahun 2021, telah dilakukan eksekusi MESOP Tahap I sebanyak 174.995.386 lembar saham, MESOP Tahap II sebanyak 103.701.152 lembar saham dan MESOP Tahap III sebanyak 69.994.759 lembar saham.

27. EQUITY (continued)

Shares Option (continued)

Option life are from grant date until June 26, 2023. After that date, any unused option rights will be void.

Those entitled to this program are the Bank's board of directors, board of commissioners except independent commissioner and permanent employees with reference to working period, performance assessment, job grade group and job grade.

The computation, method and assumption regarding MESOP Grant I, II and III generated by PT Bestama Aktuarial, an independent actuary dated January 25, 2019, July 2, 2019 and July 3, 2020.

Compensation costs recognized in the statement of profit or loss and other comprehensive income in relation to stock options for the year ended December 31, 2021 and 2020 amounted to Rp355,575 and Rp6,460,219 (Note 31) and credited to shares option in equity.

The fair value of each option rights was estimated on the vesting data using the black scholes option pricing model with the primary assumptions as follows:

The execution of shares option has been carried out by the employee for MESOP Grant I and MESOP Grant II starting on April 1, 2020 and MESOP Grant III starting on April 1, 2021.

During 2021, the execution of shares option has been carried out for MESOP Grant I amounted to 174,995,386 shares, MESOP Grant II amounted to 103,701,152 shares and MESOP Grant III amounted to 69,994,759 share.

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27. EKUITAS (lanjutan)

Opsi Saham (lanjutan)

Sisa umur dari opsi saham pada tanggal 31 Desember 2021 dan 2020 masing-masing adalah 1,30 tahun dan 2,52 tahun (tidak diaudit).

Cadangan

1) Cadangan Khusus

Merupakan cadangan yang bertujuan untuk jaminan sosial pegawai yang dibentuk sesuai dengan Keputusan Rapat Umum Tahunan Pemegang Saham tanggal 19 Mei 1992.

2) Cadangan Umum dan Wajib

Cadangan umum dan wajib pada awalnya dibentuk dalam rangka memenuhi ketentuan Pasal 61 ayat (1) Undang-undang No. 1/1995 mengenai Perseroan Terbatas (kemudian diganti dengan Undang-undang Perseroan Terbatas No. 40/2007), 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.

Pembagian Laba

Dalam Rapat Umum Pemegang Saham Tahunan (RUPST) Bank tanggal 9 April 2021 dan 19 Februari 2020, pemegang saham menyetujui pembagian laba neto dan alokasi atas saldo laba untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2020 dan 2019, sebagai berikut:

	LabarIncome	
	2020	2019
Cadangan Umum	1.563.034	2.553.071

General reserves

27. EQUITY (continued)

Shares Option (continued)

Remaining contractual life for the share options as of December 31, 2021 and 2020 are 1.30 years and 2.52 years (unaudited).

Reserves

1) Specific Reserve

Represent reserves provided for employees' social security, in compliance with the decision of Shareholders' Annual General Meeting held on May 19, 1992.

2) General and Legal Reserve

The general and legal reserves are originally provided in accordance with Law No. 1/1995 article 61 (1) on Limited Liability Company (later superseded by Limited Liability Company Law No. 40/2007), which requires Indonesian companies to set up a general and legal reserve amounting to at least 20% of the issued and paid-in capital. This particular law does not regulate the period of time in relation to the provision of such reserves.

Distribution of Net Income

Based on the Annual General Shareholders' Meetings of the Bank held on April 9, 2021 and February 19, 2020, the shareholders agreed to distribute the net income and the allocation of retained earnings for the year ended December 31, 2020 and 2019 as follows:

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28. PENDAPATAN BUNGA

28. INTEREST INCOME

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah		
Kredit yang diberikan		
Menengah	804.181.613	980.278.106
Ritel	375.884.878	432.397.144
Konsumer	142.635.340	129.611.041
Efek-efek		
Nilai wajar melalui laba rugi		
Obligasi pemerintah	6.328.310	12.122.326
Nilai wajar melalui penghasilan komprehensif lain		
Obligasi pemerintah	126.820.662	109.187.518
Obligasi	1.816.562	4.803.679
Biaya perolehan diamortisasi		
Sertifikat Bank Indonesia	-	11.314.169
Obligasi pemerintah	17.414.507	12.683.260
Obligasi	49.775.973	41.096.162
Medium-Term Notes	2.755.856	6.335.297
Negotiable Certificate Deposit	586.802	9.610.152
Efek-efek yang dibeli dengan janji dijual kembali	36.647.167	65.287.697
Penempatan pada Bank Indonesia dan bank lain		
Deposit facility dan Term Deposit	22.534.124	30.792.501
Inter-bank call money	642.193	4.056.692
Lain-lain	50	111
Giro pada Bank Indonesia dan bank lain	5.579.671	2.291.454
	1.593.603.708	1.851.867.309
Dolar Amerika Serikat		
Kredit yang diberikan		
Menengah	52.488.999	78.514.810
Ritel	347	353
Efek-efek		
Nilai wajar melalui laba rugi		
Obligasi pemerintah	-	344.577
Nilai wajar melalui penghasilan komprehensif lain		
Obligasi pemerintah	964.877	312.676
Penempatan pada Bank Indonesia dan bank lain		
Term Deposit	60.874	448.222
Inter-bank call money	340	3.537
Giro pada Bank Indonesia dan bank lain	65.899	33.302
	53.581.336	79.657.477
Total	1.647.185.044	1.931.524.786

Rupiah
Loans
Middle
Retail
Consumer
Securities
Fair value through profit or loss
Government bonds
Fair value through other
comprehensive income
Government bonds
Bonds
Amortized cost
Certificates of Bank Indonesia
Government bonds
Bonds
Medium-Term Notes
Negotiable Certificate Deposit
Securities purchased under
agreement to resell
Placements with Bank Indonesia
and other banks
Deposit facility and Term Deposit
Inter-bank call money
Others
Current accounts with
Bank Indonesia and other banks
United States Dollar
Loans
Middle
Retail
Securities
Fair value through profit or loss
Government bonds
Fair value through other
comprehensive income
Government bonds
Placements with Bank Indonesia
and other banks
Term Deposit
Inter-bank call money
Current accounts with Bank Indonesia
and other banks

Total

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29. BEBAN BUNGA

29. INTEREST EXPENSE

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Rupiah		
Deposito berjangka	537.539.794	1.077.041.726
Tabungan	99.974.480	54.911.816
Giro	51.478.124	41.541.980
Premi Lembaga penjamin Simpanan	41.149.076	42.986.484
Surat berharga yang diterbitkan	20.562.227	31.956.280
Pinjaman yang diterima	713.137	-
Simpanan dari bank lain	338.762	513.135
Lainnya	194.201	314.705
	751.949.801	1.249.266.126
Dolar Amerika Serikat		
Deposito berjangka	15.622.775	51.858.059
Simpanan dari bank lain	3.050.802	2.478.279
Giro	2.982.887	3.286.730
Pinjaman yang diterima	10.228	-
	21.666.692	57.623.068
Total	773.616.493	1.306.889.194

Rupiah
Time deposits
Saving deposits
Demand deposits
Premium for Indonesia Deposit
Insurance Corporation
Marketable securities issued
Fund borrowings
Deposits from other banks
Others

United States Dollar
Time deposits
Deposits from other banks
Demand deposits
Fund borrowings

Total

**30. PENYISIHAN (PEMBALIKAN) KERUGIAN
PENURUNAN NILAI**

Akun ini merupakan penyisihan (pembalikan) cadangan kerugian penurunan nilai atas aset keuangan (Catatan 2d), aset non-keuangan (Catatan 2n) dan tagihan komitmen dan kontinjensi, sebagai berikut:

**30. PROVISION (REVERSAL) FOR IMPAIRMENT
LOSSES**

This account represents provision (reversal) of allowance for impairment losses on financial assets (Note 2d) and non-financial assets (Note 2n) and commitment and contingencies receivables, as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Aset keuangan		
Kredit yang diberikan (Catatan 11)	3.871.480.464	317.135.264
Efek-efek (Catatan 7)	(3.980.787)	4.633.412
Tagihan akseptasi (Catatan 10)	112.202	-
Giro pada bank lain (Catatan 5)	(124.373)	182.924
Penempatan pada Bank Indonesia dan bank lain (Catatan 6)	(785.356)	450.859
Tagihan lainnya (Catatan 9)	(37.118)	37.118
	3.866.665.032	322.439.577
Aset non-keuangan		
Agunan yang diambil alih (Catatan 14)	1.259.819	(528.416)

Financial assets
Loans (Note 11)
Securities (Note 7)
Acceptance receivables (Note 10)
Current accounts with other banks (Note 5)
Placement with Bank Indonesia
and other banks (Note 6)
Other receivables (Note 9)

Non-financial assets
Foreclosed collaterals (Note 14)

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**30. PENYISIHAN (PEMBALIKAN) KERUGIAN
PENURUNAN NILAI**

Akun ini merupakan penyisihan (pembalikan) cadangan kerugian penurunan nilai atas aset keuangan (Catatan 2d), aset non-keuangan (Catatan 2n) dan tagihan komitmen dan kontinjensi, sebagai berikut (lanjutan):

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Tagihan komitmen dan kontinjensi (Catatan 24)		
Fasilitas kredit yang belum ditarik	17.166.373	600.365
Bank garansi yang diterbitkan L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor diamortisasi	22.586	(15.816)
	(51.594)	17.331
	17.137.365	601.880
Total	3.885.062.216	322.513.041

**Commitment and contingencies
receivables (Note 24)**

Unused loan facility
Guarantees issued

Irrevocable L/C

Total

**30. PROVISION (REVERSAL) FOR IMPAIRMENT
LOSSES**

This account represents provision (reversal) of allowance for impairment losses on financial assets (Note 2d) and non-financial assets (Note 2n) and commitment and contingencies receivables, as follows (continued):

31. BEBAN GAJI DAN TUNJANGAN

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Gaji	67.205.008	62.400.658
Tunjangan	59.343.696	48.499.513
Bonus dan insentif	23.974.469	17.860.109
Outsourcing	20.817.247	20.202.190
Imbalan kerja (Catatan 25)	16.778.614	8.038.982
Asuransi pegawai	14.381.797	12.603.925
Pendidikan dan pelatihan	12.241.438	4.756.678
Pengobatan	6.529.185	6.432.513
Program kepemilikan mobil	5.780.520	5.827.689
Lembur	2.725.666	2.789.670
Penerimaan karyawan	1.623.950	168.325
Dana pensiun (Catatan 25)	876.614	810.928
Opsi saham (Catatan 27)	355.575	6.460.219
Lain-lain	2.549.740	616.718
Total	235.183.519	197.468.117

Salaries
Other allowance
Bonuses and incentives
Outsourcing
Employee benefits (Note 25)
Employee insurance
Education and training
Medical
Car ownership program
Overtime
Employees recruitment
Pension fund (Note 25)
Shares option (Note 27)
Others

Total

31. SALARIES AND ALLOWANCES EXPENSE

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31. BEBAN GAJI DAN TUNJANGAN (lanjutan)

Jumlah gaji dan tunjangan untuk Direksi Bank adalah sebesar Rp9.744.213 dan Rp8.734.400, masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020, sedangkan jumlah gaji dan tunjangan untuk Dewan Komisaris Bank adalah sebesar Rp3.956.358 dan Rp3.515.398, masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 (Catatan 35).

Jumlah tantiem, bonus dan insentif Direksi, Dewan Komisaris dan karyawan kunci Bank yang dibayarkan adalah sebesar Rp2.434.266 dan Rp3.031.942, masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 (Catatan 35).

31. SALARIES AND ALLOWANCES EXPENSE (continued)

Total salaries and allowances for the Bank's Board of Directors amounted to Rp9,744,213 and Rp8,734,400 for the years ended December 31, 2021 and 2020, respectively, while the total salaries and allowances for the Bank's Board of Commissioners amounted to Rp3,956,358 and Rp3,515,398 for the year ended December 31, 2021 and 2020, respectively (Note 35).

Total tantiem, bonuses and incentives for the Board of Directors, Board of Commissioners and key employees of the Bank amounted to Rp2,434,266 and Rp3,031,942 for the years ended December 31, 2021 and 2020, respectively (Note 35).

32. BEBAN UMUM DAN ADMINISTRASI

32. GENERAL AND ADMINISTRATIVE EXPENSES

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Penyusutan dan amortisasi (Catatan 13)	25.809.493	22.962.615	Depreciation and amortization (Note 13)
Honorarium tenaga ahli	15.866.410	11.507.319	Professional fees
Iklan dan promosi	15.144.351	10.813.540	Advertisement and promotion
Biaya pungutan Otoritas Jasa Keuangan	13.033.378	13.869.979	Financial Service Authority fees
Biaya perkara	10.140.854	39.173	Provision for litigation liabilities
Pengembangan sistem	8.020.308	1.043.656	System development
Representasi	7.472.841	4.742.798	Representation
Pemeliharaan dan perbaikan	7.394.080	5.920.673	Repair and maintenance
Perjalanan dinas	6.954.280	3.531.141	Official travels
Penanganan kondisi darurat	5.417.384	209.956	Handling emergency conditions
Asuransi	4.679.337	6.722.566	Insurance
Transportasi dan pengiriman	4.044.509	3.545.965	Transportation and delivery
Transaksi ATM	4.043.957	5.630.166	ATM transactions
Keperluan kantor dan rapat	3.653.502	3.353.248	Office and meeting supplies
Kontrak service	3.594.510	1.814.553	Service contracts
Listrik, air dan gas	2.713.179	2.893.736	Electricity, water and gas
Kegiatan pegawai	2.586.126	1.214.179	Employees events
Telepon dan faksimili	2.580.176	2.087.826	Telephone and facsimile
Sewa gedung	2.479.309	2.008.093	Building rent
Alat tulis dan fotokopi	2.355.752	2.273.192	Photocopies and stationeries
Pengolahan data	1.724.167	1.879.511	Data Processing
Barang cetakan	1.512.613	1.364.506	Printed materials
Pajak dan perijinan	1.360.635	1.501.759	Taxes and licenses
Lain-lain	12.995.256	4.416.290	Others
Total	165.576.407	115.346.440	Total

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33. PENDAPATAN NON OPERASIONAL - NETO

33. NON-OPERATING INCOME – NET

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Pendapatan sewa	1.557.303	1.529.727	Rent revenue
Laba penjualan agunan yang diambil alih (Catatan 14)	141.925	420.726	Gain on sale of foreclosed collaterals (Note 14)
Laba penjualan aset tetap (Catatan 13)	620.887	5.751	Gain on sale of premises and equipment (Note 13)
Denda	(83.123)	(33.619)	Penalties
Lain-lain - neto	(1.892.041)	4.498.931	Others - net
Total	344.951	6.421.516	Total

34. LABA PER SAHAM

34. EARNINGS PER SHARE

Perhitungan laba per saham pada tanggal-tanggal
31 Desember 2021 dan 2020 adalah sebagai
berikut:

The computation of earnings per share as of
December 31, 2021 and 2020 are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,		
	2021	2020	
Laba tahun berjalan	(3.045.701.407)	31.260.682	Income for the year
Jumlah rata-rata tertimbang saham biasa yang beredar	21.521.298.397	21.343.290.230	Weighted average number of outstanding shares
Ditambah: Saham yang akan diterbitkan jika MESOP dieksekusi	1.074.803	36.526.127	Add: Shares to be issued if MESOP is exercised
Dilusan	21.522.373.200	21.379.816.357	Diluted
Laba bersih per saham dasar (Rupiah penuh)	(141,52)	1,46	Basic earnings per share (full Rupiah)
Laba bersih per saham dilusan (Rupiah penuh)	(141,51)	1,46	Diluted earnings per share (full Rupiah)

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35. TRANSAKSI PIHAK-PIHAK BERELASI

Dalam kegiatan normal usaha, Bank melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan.

Pihak-pihak berelasi Bank dan jenis hubungannya adalah sebagai berikut:

35. TRANSACTIONS WITH RELATED PARTIES

In the normal course of business, the Bank engages in transactions with related parties due to the relationship of ownership and/or management.

Related parties of the Bank and the type of relationship are as follows:

<u>Pihak-pihak berelasi/ Related parties</u>	<u>Jenis hubungan/ Types of Relationship</u>	<u>Unsur transaksi pihak berelasi/ Element of transactions</u>
PT Bank Rakyat Indonesia (Persero) Tbk	Entitas Induk/ Parent entity	Giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, efek-efek dan garansi bank yang diterbitkan/Current accounts with other banks, placement with Bank Indonesia and other bank, securities and guarantees issued
PT Bringin Gigantara	Hubungan pengendalian melalui entitas induk/Control relationship through the parent entity	Kredit yang diberikan/Loans
PT BRI Asuransi Indonesia	Hubungan pengendalian melalui entitas induk/Control relationship through the parent entity	Aset tetap/Premises and equipments
Pemerintah Republik Indonesia (RI)/ Government of the Republic of Indonesia (RI)	Kepemilikan saham mayoritas melalui Kementerian Keuangan RI/Ownership of majority shares through the Ministry of Finance of the Republic of Indonesia	Efek-efek/Securities
PT Bank Mandiri (Persero) Tbk	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Giro pada bank lain, Efek-efek/Current accounts with other banks, Securites
PT Bank Negara Indonesia (Persero) Tbk	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Giro pada bank lain/Current accounts with other banks
PT Perkebunan Nusantara II	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan, Efek-efek/Loans, securities

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

35. TRANSACTIONS WITH RELATED PARTIES (continued)

Pihak-pihak berelasi Bank dan jenis hubungannya adalah sebagai berikut (lanjutan):

Related parties of the Bank and the type of relationship are as follows (continued):

<u>Pihak-pihak berelasi/ Related parties</u>	<u>Jenis hubungan/ Types of Relationship</u>	<u>Unsur transaksi pihak berelasi/ Element of transactions</u>
PT Perkebunan Nusantara III (Persero)	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Perkebunan Nusantara VII	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Perkebunan Nusantara XIV	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Laras Astra Kartika	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Asuransi Jasa Tania Tbk	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Garansi bank yang diterbitkan, aset tetap/Guarantees issued, premises and equipments
PT Adhi Karya (Persero) Tbk	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek - efek/Securities
PT Kereta Api Indonesia (Persero)	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

35. TRANSACTIONS WITH RELATED PARTIES (continued)

Pihak-pihak berelasi Bank dan jenis hubungannya adalah sebagai berikut (lanjutan):

Related parties of the Bank and the type of relationship are as follows (continued):

<u>Pihak-pihak berelasi/ Related parties</u>	<u>Jenis hubungan/ Types of Relationship</u>	<u>Unsur transaksi pihak berelasi/ Element of transactions</u>
PT Perusahaan Listrik Negara (Persero)	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek, kredit yang diberikan/Securities, loans
PT Industri Kereta Api (Persero)	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities
PT Jasamarga Gempol Pasuruan	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Jasamarga Ngawi Kertosono Kediri	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Jasamarga Surabaya Mojokerto	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Kresna Kusuma Dyandra Marga	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Bank Mandiri Taspen	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

Pihak-pihak berelasi Bank dan jenis hubungannya adalah sebagai berikut (lanjutan):

35. TRANSACTIONS WITH RELATED PARTIES (continued)

Related parties of the Bank and the type of relationship are as follows (continued):

<u>Pihak-pihak berelasi/ Related parties</u>	<u>Jenis hubungan/ Types of Relationship</u>	<u>Unsur transaksi pihak berelasi/ Element of transactions</u>
Lembaga Pembiayaan Ekspor Indonesia	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities
PT Utama Karya (Persero)	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Indonesia Infrastructure Finance	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities
Perum Damri	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Kredit yang diberikan/Loans
PT Sarana Multigriya Finansial (Persero)	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Pinjaman yang diterima, efek-efek/ Fund borrowings, securities
PT Bank Tabungan Negara (Persero) Tbk	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities
PT Bank Mandiri Taspen	Hubungan pengendalian bersama melalui Pemerintah Pusat RI/Common control relationship through the Central Government of the Republic of Indonesia	Efek-efek/Securities

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

35. TRANSACTIONS WITH RELATED PARTIES (continued)

Saldo transaksi dengan pihak-pihak berelasi adalah sebagai berikut:

The amounts of transactions with related parties are as follows:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Aset			Assets
Giro pada bank lain (Catatan 5)			Current accounts with other banks (Note 5)
PT Bank Rakyat Indonesia (Persero) Tbk	46.673.310	28.868.035	PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk	19.443.738	7.087.976	PT Bank Mandiri (Persero) Tbk
PT Bank Negara Indonesia (Persero) Tbk	245.264	242.049	PT Bank Negara Indonesia (Persero) Tbk
	66.362.312	36.198.060	
Penempatan pada Bank Indonesia dan bank lain (Catatan 6)			Placements with Bank Indonesia and other banks (Note 6)
PT Bank Rakyat Indonesia (Persero) Tbk	5.738	5.973	PT Bank Rakyat Indonesia (Persero) Tbk
Efek-efek (Catatan 7)			Securities (Note 7)
Pemerintah Republik Indonesia	2.768.013.249	2.772.674.092	Government of the Republic of Indonesia
PT Perusahaan Listrik Negara (Persero)	290.488.202	292.770.261	PT Perusahaan Listrik Negara (Persero)
Lembaga Pembiayaan Ekspor Indonesia	-	50.000.000	Lembaga Pembiayaan Ekspor Indonesia
PT Sarana Multigriya Finansial (Persero)	75.000.000	-	PT Sarana Multigriya Financial (Persero)
PT Kereta Api Indonesia (Persero)	35.000.000	35.000.000	PT Kereta Api Indonesia (Persero)
PT Adhi Karya (Persero) Tbk	30.162.936	30.488.523	PT Adhi Karya (Persero) Tbk
PT Bank Tabungan Negara (Persero) Tbk	20.354.399	-	PT Bank Tabungan Negara (Persero) Tbk
PT Indonesia Infrastructure Finance	20.000.000	20.000.000	PT Indonesia Infrastructure Finance
PT Bank Mandiri Taspen	18.003.640	-	PT Bank Mandiri Taspen
PT Perkebunan Nusantara II	11.000.000	11.000.000	PT Perkebunan Nusantara II
PT Bank Rakyat Indonesia (Persero) Tbk	10.710.000	14.575.000	PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk	10.373.568	-	PT Bank Mandiri (Persero) Tbk
PT Industri Kereta Api (Persero)	10.000.000	10.000.000	PT Industri Kereta Api (Persero)
	3.299.105.994	3.236.507.876	
Kredit Yang Diberikan (Catatan 11)			Loans (Note 11)
PT Jasamarga Surabaya Mojokerto	-	455.469.629	PT Jasamarga Surabaya Mojokerto
PT Kresna Kusuma Dyandra Marga	396.760.519	396.937.538	PT Kresna Kusuma Dyandra Marga
PT Perkebunan Nusantara III (Persero)	335.109.450	356.214.447	PT Perkebunan Nusantara III (Persero)
PT Utama Karya (Persero)	299.862.913	299.942.450	PT Utama Karya (Persero)
Perum Perhutani	244.893.938	192.026.747	Perum Perhutani
PT Jasamarga Ngawi Kertosono Kediri	188.314.786	199.839.147	PT Jasamarga Ngawi Kertosono Kediri
Perum Damri	88.713.448	88.711.477	Perum Damri
PT Perusahaan Listrik Negara (Persero)	59.962.255	99.965.244	PT Perusahaan Listrik Negara (Persero)
PT Perkebunan Nusantara VII	49.999.943	50.000.000	PT Perkebunan Nusantara VII
PT Laras Astra Kartika	16.393.377	17.443.369	PT Laras Astra Kartika
PT Perkebunan Nusantara XIV	12.170.495	12.439.190	PT Perkebunan Nusantara XIV
PT Perkebunan Nusantara II	11.279.055	11.527.954	PT Perkebunan Nusantara II
PT Jasamarga Gempol Pasuruan	-	294.668.562	PT Jasamarga Gempol Pasuruan
PT Bringin Gigantara	-	16.377	PT Bringin Gigantara
Lain-lain	5.137.688	3.316.930	Others
	1.708.597.867	2.478.519.061	

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

35. TRANSACTIONS WITH RELATED PARTIES (continued)

Saldo transaksi dengan pihak-pihak berelasi adalah sebagai berikut (lanjutan):

The amounts of transactions with related parties are as follows (continued):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020	
Total aset dari pihak-pihak berelasi	5.074.071.911	5.751.230.970	Total assets from related parties
Total aset	16.866.522.655	28.015.492.262	Total assets
Persentase total aset dari pihak-pihak berelasi terhadap total aset	30,08%	20,53%	Percentage of total assets from related parties to total assets
Liabilitas			Liabilities
Giro (Catatan 17)			Demand deposits (Note 17)
Entitas dan lembaga pemerintah	8.115.710	586.588.574	Government entities and institutions
Lain-lain	87.913.571	427.675.924	Others
	96.029.281	1.014.264.498	
Tabungan (Catatan 18)			Saving deposits (Note 18)
Entitas dan lembaga pemerintah	39.289.703	18.554.907	Government entities and institutions
Karyawan kunci	14.694.177	11.073.840	Key employees
Lain-lain	190.633.063	707.577.969	Others
	244.616.943	737.206.716	
Deposito berjangka (Catatan 19)			Time deposits (Note 19)
Entitas dan lembaga pemerintah	248.403.610	3.251.419.102	Government entities and institutions
Karyawan kunci	7.080.767	11.455.067	Key employees
Lain-lain	481.052.008	1.228.526.031	Others
	736.536.385	4.491.400.200	
Simpanan dari bank lain (Catatan 20)			Deposits from other banks (Note 20)
Entitas dan lembaga pemerintah	71.262.500	210.750.000	Government entities and institutions
Pinjaman yang diterima (Catatan 23)			Fund borrowings (Note 23)
Entitas dan lembaga pemerintah	16.517.311	17.318.944	Government entities and institutions
Kompensasi kepada karyawan kunci (Catatan 25)			Compensation to key employees (Note 25)
Nilai kini liabilitas pemutusan hubungan kerja	9.133.955	5.067.078	Present value of work separation scheme liability
Nilai kini liabilitas cuti besar	238.617	448.889	Present value of grand leaves liability
Nilai kini liabilitas perjanjian kerja waktu tertentu	107.129	-	Present value of certain time employment agreement
Nilai kini liabilitas penghargaan masa kerja	95.467	153.035	Present value of gratuity for services liability
	9.575.168	5.669.002	
Total liabilitas kepada pihak-pihak berelasi	1.174.537.558	6.476.609.360	Total liabilities to related parties
Total liabilitas	14.408.859.476	23.727.802.051	Total liabilities
Persentase total liabilitas dari pihak-pihak berelasi terhadap total liabilitas	8,15%	27,30%	Percentage of total liabilities from related parties to total liabilities

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

Saldo transaksi dengan pihak-pihak berelasi adalah sebagai berikut (lanjutan):

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Komitmen dan kontinjensi pada rekening administratif		
Garansi bank yang diterbitkan (Catatan 38)		
PT Asuransi Jasa Tania Tbk	(961.634)	(283.883)
PT Bank Rakyat Indonesia (Persero) Tbk	(11.253)	-
Total komitmen dan kontinjensi pada rekening administratif dari pihak-pihak berelasi	(972.887)	(283.883)
Gaji dan tunjangan Dewan Komisaris, Direksi dan karyawan kunci (Catatan 31)		
Dewan Komisaris	3.956.358	3.515.398
Direksi	9.744.213	8.734.400
Karyawan kunci	12.466.668	11.140.122
	26.167.239	23.389.920
Tantiem, bonus dan insentif Dewan Komisaris, Direksi dan karyawan kunci (Catatan 31)		
Tantiem Dewan Komisaris	101.491	569.510
Tantiem Direksi	642.882	1.632.147
Bonus dan insentif karyawan kunci	1.689.893	830.285
	2.434.266	3.031.942

Persentase transaksi dengan pihak-pihak berelasi terhadap total aset dan total liabilitas Bank adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Aset		
Giro pada bank lain	0,39%	0,13%
Penempatan pada Bank Indonesia dan bank lain	0,00%	0,00%
Efek-efek	19,56%	11,55%
Kredit yang diberikan	10,13%	8,85%
	30,08%	20,53%
Liabilitas		
Giro	0,67%	4,27%
Tabungan	1,70%	3,11%
Deposito berjangka	5,11%	18,93%
Simpanan dari bank lain	0,49%	0,89%
Pinjaman yang diterima	0,11%	0,08%
Kompensasi kepada karyawan kunci	0,07%	0,02%
	8,15%	27,30%

35. TRANSACTIONS WITH RELATED PARTIES (continued)

The amounts of transactions with related parties are as follows (continued):

Commitments and contingencies in administrative accounts
Guarantees issued (Note 38)
PT Asuransi Jasa Tania Tbk
PT Bank Rakyat Indonesia (Persero) Tbk
Total commitments and contingencies in administrative accounts from related parties
Salaries and allowances of Boards of Commissioners, Directors and key employees (Note 31)
Boards of Commissioners
Board of Directors
Key employees
Tantiem, bonus and incentives of Board of Commissioners, Directors and key employees (Note 31)
Tantiem of Board of Commissioner
Tantiem of Board of Directors
Bonus and incentives of key employees

Percentage of transactions with related parties to total assets and total liabilities of the Bank are as follows:

Assets
Current accounts with other banks
Placements with Bank Indonesia and other banks
Securities
Loans
Liabilities
Demand deposits
Saving deposits
Time deposits
Deposits from other bank
Fund borrowings
Compensation to key employees

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35. TRANSAKSI PIHAK-PIHAK BERELASI (lanjutan)

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank telah mengasuransikan aset tetap kepada PT Asuransi Jasa Tania Tbk dan PT BRI Asuransi Indonesia (Catatan 13).

**35. TRANSACTIONS WITH RELATED PARTIES
(continued)**

As of December 31, 2021 and 2020, the Bank has insured its premises and equipment to PT Asuransi Jasa Tania Tbk and PT BRI Asuransi Indonesia (Note 13).

36. MANAJEMEN RISIKO

Dalam rangka mencapai manajemen risiko yang mendukung pencapaian target kinerja dan mampu menjaga kelangsungan usaha, diperlukan strategi manajemen risiko yang proaktif yang dapat meningkatkan efektivitas penggunaan modal dan tingkat pengembangan modal (*return on equity/ROE*) sehingga dapat memberikan nilai tambah bagi pemegang saham, mengantisipasi ketentuan baru yang mengarah pada *best practice*, meningkatkan kepercayaan pemegang saham dan *stakeholders* lainnya serta meningkatkan bisnis pada tingkat optimal. Bank selaku lembaga jasa keuangan (LJK) telah menerapkan manajemen risiko sesuai ketentuan Otoritas Jasa Keuangan antara lain dengan menerapkan proses manajemen risiko yang telah dituangkan dalam beberapa kebijakan dan prosedur, antara lain Kebijakan Umum Manajemen Risiko (KUMR). KUMR berperan sebagai aturan tertinggi dalam implementasi manajemen risiko pada seluruh kegiatan bisnis Bank, yang meliputi kebijakan, strategi, organisasi, sistem informasi manajemen risiko, pengawasan risiko, pengelolaan produk dan aktivitas baru dan *Business Continuity Plan* (BCP).

Proses penerapan manajemen risiko meliputi identifikasi, pengukuran, pemantauan, pengelolaan dan pengendalian terhadap 8 (delapan) risiko yaitu risiko kredit, risiko pasar, risiko likuiditas, risiko operasional, risiko kepatuhan, risiko strategis, risiko hukum dan risiko reputasi.

Profil risiko Bank menggambarkan risiko yang melekat dalam kegiatan bisnis Bank (*inherent risk*) termasuk kualitas penerapan Manajemen Risiko yang mencerminkan sistem pengendalian risiko (*risk control system*) melalui proses *self assessment* pada seluruh aktivitas bisnis Bank yang mencakup 8 (delapan) risiko. Penilaian Profil Risiko Bank telah dilakukan sesuai dengan ketentuan SEOJK No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

36. RISK MANAGEMENT

In order to achieve risk management that supports the achievement of performance targets and is able to maintain business continuity, a proactive risk management strategy is needed that can increase the effectiveness of the use of capital and the level of capital development (*return on equity / ROE*) so that it can provide added value to shareholders, anticipate new policies that lead to best practices, increase the trust of shareholders and other stakeholders as well as increase the business at an optimal level. The Bank as a financial services institution (LJK) has implemented risk management in accordance with the Financial Services Authority regulations, among others, by implementing a risk management process as outlined in several policies and procedures, including the General Risk Management Policy (KUMR). KUMR acts as the highest rule in risk management implementation in all business activities of the Bank, which includes policies, strategies, organizations, risk management information systems, risk monitoring, management of new products and activities and *Business Continuity Plan* (BCP).

The process of implementing risk management includes identification, measurement, monitoring, management and control of 8 (eight) risks, namely credit risk, market risk, liquidity risk, operational risk, compliance risk, strategic risk, legal risk and reputation risk.

The assessment of the Bank's risk profile describes the risks inherent in the Bank's business activities (*inherent risk*) including the quality of Risk Management implementation that reflects a risk control system through a self-assessment process for all Bank business activities which includes 8 (eight) risks. The assessment of the Bank's Risk Profile has been carried out in accordance with the provisions of SEOJK No. 14 / SEOJK.03 / 2017 concerning Assessment of the Soundness of Commercial Banks.

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36. MANAJEMEN RISIKO (lanjutan)

Dewan Komisaris melakukan evaluasi terhadap kebijakan dan implementasi manajemen risiko yang dilakukan oleh Direksi. Evaluasi dilakukan dalam rangka memastikan bahwa Direksi mengelola aktivitas dan risiko-risiko Bank secara efektif. Dalam melakukan pengawasan aktif terhadap manajemen risiko Bank, Dewan Komisaris dibantu oleh Komite Pemantau Risiko.

Direksi menentukan arah kebijakan dan strategi manajemen risiko secara komprehensif beserta implementasinya. Selain itu, Direksi bertanggungjawab untuk memastikan bahwa seluruh risiko yang material dan dampak yang ditimbulkan oleh risiko dimaksud telah ditindaklanjuti, termasuk pelaksanaan langkah-langkah perbaikan atas permasalahan atau penyimpangan dalam kegiatan usaha Bank yang ditemukan oleh Satuan Kerja Audit Intern (SKAI).

Direksi Bank dibantu oleh Komite Manajemen Risiko (Risk Management Committee/RMC) sebagai komite tertinggi dalam sistem manajemen risiko Bank. Komite Manajemen Risiko mempunyai tugas dan tanggung jawab memberikan rekomendasi kepada Direktur Utama dalam merumuskan kebijakan, strategi manajemen risiko termasuk penetapan limit serta memperbaiki atau menyempurnakan pelaksanaan manajemen risiko yang dilakukan secara berkala maupun insidental sebagai akibat dari perubahan kondisi eksternal dan internal Bank yang akan mempengaruhi kecukupan permodalan dan profil risiko.

Penerapan manajemen risiko melibatkan semua unsur dalam Bank, dimana Dewan Komisaris dan Direksi mempunyai tugas memastikan penerapan manajemen risiko telah memadai sesuai dengan karakteristik, kompleksitas dan profil risiko Bank serta memahami dengan baik jenis dan tingkat risiko yang melekat pada kegiatan bisnis bank.

Berdasarkan laporan terakhir *self assessment*, peringkat risiko inheren Bank posisi 31 Desember 2021 berada pada peringkat 2 (Low to Moderate) dengan peringkat kualitas penerapan manajemen risiko berada pada peringkat 2 (Satisfactory) sehingga peringkat komposit Profil Risiko Bank adalah 2 (Low to Moderate) (tidak diaudit).

36. RISK MANAGEMENT (continued)

The Board of Commissioners evaluates the policies and implementation of risk management by the Board of Directors. Evaluation is carried out in order to ensure that the Board of Directors manages the Bank's activities and risks effectively. In carrying out active supervision of the Bank's risk management, the Board of Commissioners is assisted by the Risk Monitoring Committee.

The Board of Directors determines the direction of policies and risk management strategies in a comprehensive manner and their implementation. In addition, the Board of Directors is responsible for ensuring that all material risks and impacts arising from these risks have been followed up, including the implementation of corrective measures for problems or irregularities in the Bank's business activities discovered by the Internal Audit Unit (SKAI).

The Board of Directors of the Bank is assisted by the Risk Management Committee (RMC) as the highest committee in the Bank's risk management system. The Risk Management Committee has the task and responsibility of providing recommendations to the President Director in formulating policies, risk management strategies including setting limits and improving or enhancing the implementation of risk management which is carried out periodically or incidentally as a result of changes in the Bank's external and internal conditions which will affect capital adequacy and risk profile.

The implementation of risk management involves all elements in the Bank, where the Board of Commissioners and the Board of Directors have the task of ensuring that the implementation of risk management is adequate in accordance with the characteristics, complexity and risk profile of the Bank as well as understanding well the types and levels of risk inherent in the bank's business activities.

Based on the latest self-assessment report, the Bank's inherent risk rating for the position of December 31, 2021 is in the 2nd rank (Low to Moderate) with the quality ranking of risk management implementation at 2nd rank (Satisfactory) so that the composite ranking of the Bank's Risk Profile is 2 (Low to Moderate) (unaudited).

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36. MANAJEMEN RISIKO (lanjutan)

Parameter tingkat kesehatan bank (TKB) Bank pada tanggal 31 Desember 2021 sebagai berikut:

1. Profil risiko

Hasil penilaian Profil Risiko Bank secara *self assessment* periode 31 Desember 2021 di peringkat 2 (Low to Moderate) dengan tren membaik dibandingkan periode 31 Desember 2020. Risiko yang terdampak pandemi Covid-19 adalah aktivitas perkreditan dan pencapaian angka strategik.

Aktivitas perkreditan yang terdampak pandemi Covid-19 telah dilakukan tindak lanjut penanganan berupa analisa prospek dan sisa kemampuan membayar kemudian dilakukan restrukturisasi fasilitas kredit. Terdapat perbaikan risiko berupa kualitas kredit menjadi 1,59% untuk kredit bermasalah (neto) dan kenaikan CKPN coverage terhadap *Non-Performing Loan* dari 103,96% pada tahun lalu menjadi 417,86%.

Perbaikan risiko strategis terjadi dikarenakan Bank telah berhasil menurunkan *outstanding* kredit menengah untuk menyesuaikan dengan strategi bisnis yang bertransformasi ke bisnis digital. Pencapaian target produk digital yaitu Pinang dan realisasi program kerja *strategic initiatives* telah berjalan sesuai RBB dan rutin dipresentasikan secara mingguan kepada Direksi. Selain itu, perbaikan risiko Reputasi terjadi karena disebabkan beberapa hal, diantaranya tidak ada pemberitaan negatif terkait Bank, mengadakan Webinar Raya Academy setiap bulan dengan mengundang pembicara *Leaders Fintech* untuk *sharing* pengetahuan sekaligus memperkenalkan Bank kepada masyarakat umum, selain itu secara aktif melakukan *campaign* dengan *followers* Bank yang dikomunikasikan melalui media Instagram, Twitter, Facebook, LinkedIn, serta Youtube.

36. RISK MANAGEMENT (continued)

The Bank's parameters for the bank soundness level (TKB) as of December 31, 2021 are as follows:

1. Risk profile

The results of the Bank's self-assessment Risk Profile for the period 31 December 2021 were ranked 2 (Low to Moderate) with an improving trend compared to the 31 December 2020 period. The risks affected by the Covid-19 pandemic were lending activities and achieving strategic figures.

Credit activities affected by the Covid-19 pandemic have been followed up by handling in the form of prospect analysis and remaining ability to pay then restructuring credit facilities. There was an improvement in risk in the form of credit quality to 1.59% for non-performing loans (Net) and an increase in CKPN coverage against Non-Performing Loans from 103.96% on prior year to 417.86%.

The improvement in strategic risk occurs because the Bank has succeeded in reducing the outstanding medium credit to adjust to a business strategy that is transforming into a digital business. The achievement of the digital product target, namely Pinang and the realization of strategic initiatives work programs have been running according to the RBB and are routinely presented weekly to the Board of Directors. In addition, the improvement in Reputation risk occurred due to several reasons, including the absence of negative news regarding the Bank, holding a monthly Raya Academy Webinar by inviting Leaders Fintech speakers to share knowledge as well as introducing the Bank to the general public, in addition to actively conducting campaigns with the Bank's followers communicated through Instagram, Twitter, Facebook, LinkedIn, and Youtube.

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Parameter tingkat kesehatan bank (TKB) Bank pada tanggal 31 Desember 2021 sebagai berikut (lanjutan):

2. Rentabilitas

Hasil pencapaian rentabilitas untuk tahun yang berakhir pada tanggal 31 Desember 2021 adalah peringkat 3 (Cukup Memadai) yang tercermin pada pencapaian laba/rugi bersih Bank. Pencapaian rugi dibukukan sampai dengan tanggal 31 Desember 2021 dikarenakan pembentukan biaya CKPN untuk memitigasi risiko kredit menengah mengingat strategi bisnis Bank yang bertransformasi memindahkan fokus bisnisnya ke bisnis digital.

3. Permodalan

Penerapan PSAK 71 menyebabkan Bank melakukan lebih banyak pencadangan biaya aset produktif. Permodalan Bank sampai dengan bulan Desember 2020 berada pada posisi skor 2 (Memadai) dengan kecukupan *Capital Adequacy Ratio* (CAR) untuk mengantisipasi potensi kerugian sesuai profil risiko mencapai 19,61%. Angka ini jauh melampaui batas persyaratan minimum CAR sesuai regulasi Otoritas Jasa Keuangan (OJK) yaitu CAR 10,00% sesuai *internal capital adequacy assessment process* (ICAAP). Dewan Komisaris dan Direksi turut berperan aktif dalam memantau kecukupan modal Bank.

4. Tata Kelola

Tata kelola Bank pada posisi Desember 2021 berada pada peringkat 2 (Baik) yang mencerminkan bahwa Bank telah menerapkan prinsip-prinsip *corporate governance* yang baik dan tercermin pada kegiatan operasionalnya dengan menetapkan kebijakan dan prosedur yang memadai serta adanya tugas dan kewenangan yang jelas dalam pengambilan keputusan. Selain itu Bank juga melakukan penanganan terhadap aset produktif yang terdampak pandemi Covid-19, berkoordinasi dengan debitur, melakukan penilaian risiko dan melaksanakan program restrukturisasi kredit.

36. RISK MANAGEMENT (continued)

The Bank's parameters for the bank soundness level (TKB) as of December 31, 2021 are as follows (continued):

2. Rentability

The result of achieving rentability for the year ended December 31, 2021 is a score of 3 (Quite Adequate), which is reflected in the achievement of the Bank's net profit/loss. The loss achievement was recorded until December 31, 2021 due to the formation of CKPN fees to mitigate medium credit risk considering Bank Raya's business strategy was transforming to shift its business focus to digital business.

3. Capital

The adoption of PSAK 71 causes the Bank to make more provision for the cost of productive assets. The Bank's capital as of December 2020 is in a score of 2 (Adequate) with a sufficient capital adequacy ratio (CAR) to anticipate potential losses according to the risk profile of up to 19.61%. This figure far exceeds the minimum CAR requirement according to the Financial Services Authority (OJK) regulation, namely a CAR of 10.00% according to the internal capital adequacy assessment process (ICAAP). The Boards of Commissioners and Directors play an active role in monitoring the capital adequacy of the Bank.

4. Governance

The Bank's governance as of December 2021 is ranked 2 (Good) which reflects that Bank Raya has implemented the principles of good corporate governance and its operational activities by establishing adequate policies and procedures as well as having clear duties and authorities in decision making. In addition, the Bank also handles productive assets that cause the Covid-19 pandemic, coordinates with debtors, conducts assessments and carries out credit restructuring programs.

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36. MANAJEMEN RISIKO (lanjutan)

Parameter tingkat kesehatan bank (TKB) Bank pada tanggal 31 Desember 2021 sebagai berikut (lanjutan):

4. Tata kelola (lanjutan)

Pengawasan berkala dilakukan Direksi dan Dewan Komisaris terhadap progress perbaikan restrukturisasi aset produktif yang terdampak Covid-19 maupun non Covid-19 dan dilaporkan secara berkala kepada Regulator. Hal ini menunjukkan bahwa pengungkapan dan transparansi informasi kinerja Bank telah dilakukan secara memadai.

Bank telah melaksanakan langkah perbaikan dan manajemen risiko yang diperlukan sesuai dengan Peraturan Otoritas Jasa Keuangan (POJK) No. 48 /POJK.03/2020 Tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2020 Tentang Stimulus Perekonomian Nasional Sebagai Kebijakan *Countercyclical* Dampak Penyebaran *Coronavirus Disease 2019*, sehingga dampak pandemi Covid-19 terukur dengan baik melalui pencadangan yang dibentuk dan pelaksanaan restrukturisasi aset produktif.

Risiko Kredit

Dalam meningkatkan pertumbuhan bisnis kredit dilakukan pengelolaan kualitas mulai dari tahap awal proses prakarsa kredit hingga pelunasan kredit. *Monitoring* dan pembinaan dilakukan terhadap Debitur dan Pemasar untuk memastikan kredit tetap terjaga performansinya (*Performing Loan/PL*). Pengelolaan kredit yang efektif dan efisien akan meminimalkan risiko *bad debt* dan *loss* sehingga pencadangan biaya yang dialokasikan untuk aktivitas perkreditan menjadi minimum.

Tujuan pengelolaan risiko kredit Bank adalah untuk mengoptimasi penggunaan sumber dana yang berasal dari Dana Pihak Ketiga maupun akumulasi laba untuk memperoleh pendapatan bunga aset produktif yang wajar, memenuhi target kinerja yang telah ditetapkan oleh *shareholders*, memastikan *cost and benefit* yang optimal dan menjaga kecukupan pencadangan biaya baik pada tingkat individu maupun portofolio kredit keseluruhan.

36. RISK MANAGEMENT (continued)

The Bank's parameters for the bank soundness level (TKB) as of December 31, 2021 are as follows (continued):

4. Governance (continued)

Periodic supervision is carried out by the Board of Directors and the Board of Commissioners on the progress of improving the restructuring of productive assets that are active both Covid-19 and non-Covid-19 and reported regularly to the Regulator. This shows that the performance and performance of the bank has been carried out adequately.

The Bank has carried out the necessary remedial and risk management steps in accordance with the Financial Services Authority Regulation No. 48/POJK.03/2020 concerning Amendments to the Financial Services Authority Regulation No. 11/POJK.03/2020 concerning National Economic Stimulus as a Countercyclical Policy on Spread Impacts Coronavirus Disease 2019, so that the impact of the Covid-19 pandemic is well measured through the provision that has been established and the implementation of restructuring of productive assets.

Credit Risk

In the credit business growth do quality management starting from the early stages of the initiative process credit until the credit repayment. Monitoring and coaching made to the Borrower and marketers to ensure credit is maintained performance (*Performing Loan/PL*). Credit management effective and efficient will minimize the risk of bad debt and loss so that provisioning expenses allocated to lending activities to a minimum.

The objective of the Bank credit risk management is to optimize the use of sources of funds originating from Third Party Funds as well as accumulated profits to obtain reasonable earning assets interest income, meet the performance targets set by shareholders, ensure optimal cost and benefits and maintain adequate reserve costs, both at the individual level and the overall loan portfolio.

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36. MANAJEMEN RISIKO (lanjutan)

Risiko Kredit (lanjutan)

Bank telah memiliki kebijakan dan prosedur perkreditan serta manajemen risiko kredit, yang diputuskan melalui forum Komite Kebijakan Perkreditan (KKP), Komite Kredit (KK), Komite Kebijakan Kredit dan Pengembangan Produk (KKK-PP), Komite Manajemen Risiko (RMC) yang beranggotakan Direksi dan anggota manajemen senior serta Rapat Direksi (Radisi) dan disetujui oleh Dewan Komisaris, juga secara tertulis dituangkan pada Kebijakan Umum Perkreditan (KUP), Pedoman Pelaksanaan Kredit (PPK) Ritel dan Menengah.

Kebijakan Umum Perkreditan (KUP) memberikan pedoman lengkap keseluruhan proses pemberian kredit dari proses awal pengajuan kredit, proses analisis, persetujuan, pemantauan, dokumentasi, pengendalian, penyelamatan atau restrukturisasi dan penyelesaian kredit, sehingga dapat menjaga kualitas dan target bisnis yang ditetapkan.

Dalam rangka mendukung proses pemberian kredit yang *prudent* Bank melakukan pengkajian dan penyempurnaan kebijakan perkreditan maupun proses bisnis perkreditan secara berkala.

Pengelolaan risiko kredit diukur dan diterapkan pada tingkat individu dan portofolio pada segmen Menengah, Ritel dan Konsumer. Fungsi pemasaran dan analisa kredit dilakukan oleh *Account Officer* yang berada di bawah Unit Bisnis. Selanjutnya Unit Analisa Risiko Kredit *mensupport* data analisa kredit secara makro sesuai dengan prinsip 5C (*Character, Capacity, Capital, Condition, Collateral*) dan 5P (*Penilaian, Pengikatan, Penguasaan, Pengamanan, dan Pemanfaatan*). Putusan terhadap usulan kredit dilakukan oleh Pejabat yang berbeda dari Pemrakarsa kredit yaitu individu Pemutus kredit ataupun rapat Komite Kredit sesuai dengan eksposur kredit yang diputus. Dengan demikian, putusan yang diberikan sesuai dengan asas-asas perkreditan yang baik dan sehat berdasarkan profesionalisme secara jujur, obyektif, cermat dan seksama.

Manajemen Risiko Kredit

Penerapan manajemen risiko untuk aktivitas perkreditan dilakukan sebagai berikut:

- Terdapat pemisahan Pejabat *Relationship Management* (RM) dan *Credit Risk Management* (CRM).

36. RISK MANAGEMENT (continued)

Credit Risk (continued)

The Bank has policies and procedures for credit and credit risk management, which are decided through the Credit Policy Committee (KKP), Credit Committee (KK), Credit Policy and Product Development Committee (KKK-PP), and the Risk Management Committee (RMC), whose members are The Board of Directors and members of senior management as well as the Board of Directors Meeting and approved by the Board of Commissioners, are also set out in writing in the General Credit Policy (KUP), Retail and Medium Credit Implementation Guidelines (PPK).

The General Credit Policy (KUP) provides complete guidelines for the entire process of credit granting from the initial credit application process, the analysis process, approval, monitoring, documentation, control, rescue or restructuring and credit settlement, so as to maintain the quality and business targets set.

In order to support a prudent lending process, the Bank regularly reviews and refines credit policies and pre-credit business processes.

Credit risk management is measured and applied at the individual and portfolio levels in the Medium, Retail and Consumer segments. Marketing and credit analysis functions are carried out by *Account Officers* who are under the Business Unit. Furthermore, the Credit Risk Analysis Unit supports macro credit analysis data in accordance with the 5C (*Character, Capacity, Capital, Condition, Collateral*) and 5P (*Assessment, Binding, Control, Safeguarding and Utilization*) principles. Decisions on credit proposals are made by different Officials from the Credit Proponent, namely individual creditors or Credit Committee meetings in accordance with the approved credit exposure. Thus, the decisions given are in accordance with the principles of sound and sound credit based on professionalism in an honest, objective, careful and thorough manner.

Credit Risk Management

Implementation of credit risk management is done by effort of:

- There is a separation of *Relationship Management* (RM) and *Credit Risk Management* (CRM).

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

Penerapan manajemen risiko untuk aktivitas perkreditan dilakukan sebagai berikut (lanjutan):

- Terdapat pemisahan pengelolaan kredit lancar (performing) dengan kredit kualitas rendah agar pengelolaan risiko dalam aktivitas perkreditan dan aktivitas perkreditan yang berorientasi pada pertumbuhan bisnis yang sehat dilaksanakan berjalan baik.
- Setiap individu Pejabat kredit lini mendapat delegasi kewenangan memprakarsai atau memutus kredit yang dituangkan dalam suatu penetapan berdasarkan pertimbangan kompetensi, kapabilitas, pengalaman di bidang perkreditan, integritas, sehingga setiap prakarsa atau putusan akan dibuat berdasarkan penilaian yang tajam dan komprehensif dengan menerapkan prinsip kehati-hatian dalam perbankan (prudential banking).
- *Credit Risk Rating* (CRR) dan *Credit Risk Scoring* (CRS) sebagai perangkat pengukur risiko dalam proses perkreditan.
- Kapasitas *appetite* kredit ditetapkan melalui Pasar Sasaran (PS) dan Kriteria Risiko yang Dapat Diterima (KRD) serta penerapan *Loan Portfolio Guidelines* (LPG) sebagai pedoman dalam pelaksanaan ekspansi kredit.
- Pengendalian risiko dilakukan dengan cara melakukan pembatasan eksposur, *monitoring on site* dan *off site* terhadap usaha debitur, dan tindakan perbaikan sehingga usaha debitur maupun bisnis bank berjalan lancar.
- Dalam melakukan monitoring terhadap usaha Debitur diterapkan konsep *early warning system* (EWS) untuk mendeteksi dini potensi permasalahan bisnis baik karena sebab internal maupun faktor eksternal.
- (i) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya:

Nilai tercatat dari aset keuangan Bank selain kredit yang diberikan dan efek-efek yang dibeli dengan janji dijual kembali menggambarkan eksposur maksimum atas risiko kredit.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

Implementation of credit risk management is done by effort of (continued):

- *There is a separation of the management of current loans (performing) from low quality loans so that risk management in lending activities and credit activities oriented towards healthy business growth are carried out smoothly.*
- *Each individual line credit officer receives a delegation of authority to initiate or decide on credit as outlined in a determination based on considerations of competence, capability, experience in credit, integrity, so that every initiative or decision will be made based on a sharp and comprehensive assessment by applying the principle of prudence in banking (prudential banking).*
- *Credit Risk Rating (CRR) and Credit Risk Scoring (CRS) as risk measurement tools in the credit process.*
- *The capacity for the credit appetite is determined through the Target Market (PS) and Acceptable Risk Criteria (KRD) as well as the application of the Loan Portfolio Guidelines (LPG) as a guide in the implementation of credit expansion.*
- *Risk control is carried out by limiting exposure, monitoring on site and off site of the Debtor's business, and taking corrective actions so that both the debtor's business and the bank's business run smoothly.*
- *In monitoring the Debtor's business, an early warning system (EWS) concept is applied to early detect potential business problems due to internal and external factors.*
- (i) *Analysis of the maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation:*

The carrying amount of the Bank's financial assets other than loans and securities purchased under agreements to resell represent the maximum exposure to credit risk.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

- (ii) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya (lanjutan):

Untuk kredit yang diberikan, Bank menggunakan agunan untuk meminimalkan risiko kredit. Berdasarkan klasifikasi risiko, portofolio kredit Bank dapat dibedakan menjadi dua kelompok, yaitu:

- (a) *Secured loans*
- (b) *Partially secured loans*

Untuk *secured loans*, Bank menetapkan jenis dan nilai agunan yang dijamin sesuai skema kredit dan perkiraan tingkat risiko kredit dari *counterparty* sebagai *second way out* yang ditetapkan. Jenis dari agunan terdiri dari:

- (a) Agunan fisik, seperti tanah dan bangunan, BPKB kendaraan bermotor, dan properti.
- (b) Agunan keuangan, seperti simpanan tabungan, giro, deposito berjangka, dan surat berharga.
- (c) Lainnya, seperti piutang dagang, garansi, jaminan Pemerintah, dan Lembaga Penjamin.

Partially secured loans merupakan kredit yang diberikan untuk skema kredit tertentu yang telah melalui uji kelayakan sehingga walaupun tidak sepenuhnya dijamin oleh agunan, namun telah dilakukan mitigasi risiko yang diperlukan sehingga kemampuan pengembaliannya dapat dipastikan.

Segmen kredit konsumen yang merupakan kredit kepada karyawan dan kredit konsumtif, guna memperkecil risiko gagal bayar bilamana karyawan meninggal dunia atau mengalami Pemutusan Hubungan Kerja (PHK) maka kredit ini dilindungi oleh asuransi jiwa dan asuransi PHK dengan *banker's clause*.

Segmen kredit ritel dan menengah merupakan kredit tujuan produktif, sesuai ketentuan perkreditan diperlukan agunan. Agunan dapat berupa agunan fisik, agunan keuangan, atau lainnya seperti piutang dagang atau garansi.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

- (ii) *Analysis of the maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation (continued):*

For loans, the Bank uses collateral to minimize credit risk. Based on the risk classification, Bank credit portfolios can be divided into two groups, namely:

- (a) *Secured loans*
- (b) *Partially secured loans.*

For secured loans, the Bank determines the type and amount of collateral pledged in accordance with the credit scheme and the counterparty's estimated credit risk level as the second way out. Types of collateral consist of:

- (a) *Physical collateral, such as land and buildings, motor vehicle BPKB, and property.*
- (b) *Financial collaterals, such as savings deposits, demand deposits, time deposits and marketable securities.*
- (c) *Others, such as accounts receivable, guarantees, government guarantees and guarantees.*

Partially secured loans are loans given to certain credit schemes that have passed due diligence so that, although not fully guaranteed by collateral, the necessary risk mitigation has been carried out so that their repayment ability can be ascertained.

The consumer credit segment, which is credit to employees and consumer credit, in order to minimize the risk of default when an employee dies or experiences a termination of employment, this credit is protected by life insurance and termination insurance with banker's clause.

The retail and medium-sized credit segment is credit for productive purposes, according to the terms of credit, collateral is required. Collateral can be in the form of physical collateral, financial collateral, or others such as accounts receivable or guarantees.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

- (i) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya (lanjutan):

Untuk seluruh agunan khususnya *physical collateral* akan dilakukan penilaian dimana nilai likuidasi atas agunan tersebut digunakan dalam menentukan kecukupan agunan (*collateral coverage ratio*).

Agunan dilakukan pengikatan sesuai ketentuan perkreditan sehingga risiko kredit diminimalkan apabila debitur mengalami kegagalan dalam pembayaran kembali (*wanprestasi*) di kemudian hari.

Selain aspek agunan untuk meminimalkan risiko kredit, pemberian kredit oleh Bank selalu dilakukan berdasarkan evaluasi dan analisa kelayakan sehingga kemampuan pengembalian kredit (*first way out*) dapat dipastikan. Setiap pengajuan kredit wajib melalui proses *pre screening* kemudian dilakukan *scoring* untuk kredit konsumtif dan *rating* untuk kredit komersial.

Terdapat keharusan bagi debitur untuk memenuhi evaluasi atas kelayakan bisnisnya memperoleh kredit, pengikatan kredit secara legal, *pre screening* dan proses *rating* atau *scoring*, dan kecukupan agunan yang dipersyaratkan, untuk menurunkan eksposur risiko pinjamannya ke tingkat yang layak dan dapat diterima.

Tabel dibawah ini menunjukkan *net maximum exposure* atas risiko kredit untuk efek-efek yang dibeli dengan janji dijual kembali pada tanggal-tanggal 31 Desember 2021 dan 2020:

31 Desember/December 31, 2021		
	Eksposur maksimum/ Maximum exposure	Agunan/ Collaterals
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	652.914.581

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

- (i) Analysis of the maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation (continued):

For all collateral, especially physical collateral, an assessment will be conducted in which the liquidation value of the collateral is used in determining the collateral coverage ratio.

Collateral is bound according to the terms of credit so that credit risk is minimized if the debtor fails to repay (default) at a later date.

In addition to the collateral aspect to minimize credit risk, the provision of credit by the Bank is always carried out based on evaluation and feasibility analysis so that the ability to repay credit (*first way out*) can be ascertained. Every credit application must go through a pre-screening process, then scoring for consumptive credit and a rating for commercial credit.

There is a requirement for debtors to fulfill an evaluation of the feasibility of obtaining credit for their business, legally binding credit, pre-screening and rating or scoring processes, and the adequacy of collateral required, in order to reduce their loan risk exposure to an acceptable and acceptable level.

The table below shows the net maximum exposure to credit risk for securities purchased under agreement to resell on December 31, 2021 and 2020:

Securities purchased under agreement to resell

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Manajemen Risiko Kredit (lanjutan)

- (i) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya (lanjutan):

Tabel dibawah ini menunjukkan *net maximum exposure* atas risiko kredit untuk efek-efek yang dibeli dengan janji dijual kembali pada tanggal-tanggal 31 Desember 2021 dan 2020 (lanjutan):

31 Desember/December 31, 2020			
	Eksposur maksimum/ Maximum exposure	Agunan/ Collaterals	Eksposur neto/ Net exposure
Efek-efek yang dibeli dengan janji dijual kembali	3.047.732.345	3.198.316.160	-

Securities purchased under agreement to resell

- (ii) Kualitas aset keuangan

Tabel di bawah menunjukkan kualitas aset keuangan berdasarkan golongan aset untuk semua aset keuangan yang mempunyai risiko kredit (diluar cadangan kerugian penurunan nilai):

31 Desember/December 31, 2021					
	Belum jatuh tempo atau tidak mengalami penurunan nilai/Neither past due nor impaired	Tingkat standar/ Standard grade	Tingkat tinggi/ High grade	Telaah jatuh tempo tetapi tidak mengalami penurunan nilai/ Past-due but not impaired	Mengalami penurunan nilai/ impaired
Aset					
Giro pada Bank Indonesia	557.506.779	-	-	-	557.506.779
Giro pada bank lain	82.210.830	110.583.985	-	-	192.794.815
Penempatan pada Bank Indonesia dan bank lain	1.374.726.979	-	-	-	1.374.726.979
Efek-efek					
Nilai wajar melalui laba rugi	159.934.000	-	-	-	159.934.000
Nilai wajar melalui penghasilan komprehensif lain	2.320.510.098	-	-	-	2.320.510.098
Biaya perolehan diamortisasi	1.015.067.512	-	-	-	1.015.067.512
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	-	-	-	650.377.813
Tagihan lainnya					
Kredit yang diberikan					
Menengah	3.488.909.409	297.828.059	60.975.308	3.209.587.626	7.057.300.402
Ritel	2.034.341.553	612.827.509	165.954.386	780.200.625	3.593.324.073
Konsumer	771.935.088	131.012.188	48.527.476	6.228.171	957.702.923
Tagihan Akseptasi	-	92.561.485	-	-	92.561.485
Penyertaan saham	-	77.510	-	-	77.510
Aset lain-lain ¹⁾	39.790.505	35.216.772	-	-	75.007.277
Total	12.495.310.566	1.280.107.508	275.457.170	3.996.016.422	18.046.891.666

¹⁾ Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

- (ii) Analysis of the maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation (continued):

The table below shows the net maximum exposure to credit risk for securities purchased under agreement to resell on December 31, 2021 and 2020 (continued):

- (ii) Financial assets quality

The table below shows financial assets quality per class of assets for all financial assets exposed by credit risk (gross of allowance for impairment losses):

¹⁾ Other assets consist of interest receivables and other receivables

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Manajemen Risiko Kredit (lanjutan)

(ii) Kualitas aset keuangan (lanjutan)

Tabel di bawah menunjukkan kualitas aset keuangan berdasarkan golongan aset untuk semua aset keuangan yang mempunyai risiko kredit (diluar cadangan kerugian penurunan nilai) (lanjutan):

31 Desember/December 31, 2020					
	Belum jatuh tempo atau tidak mengalami penurunan nilai/ <i>Neither past due nor impaired</i>		Telah jatuh tempo tetapi tidak mengalami penurunan nilai/ <i>Past-due but not impaired</i>	Mengalami penurunan nilai/ <i>impaired</i>	Total
	Tingkat tinggi/ <i>High grade</i>	Tingkat standar/ <i>Standard grade</i>			
Aset					
Giro pada Bank Indonesia	756.177.533	-	-	-	756.177.533
Giro pada bank lain	51.497.392	280.598.478	-	-	332.095.870
Penempatan pada Bank Indonesia dan bank lain	1.516.959.428	-	-	-	1.516.959.428
Efek-efek					
Nilai wajar melalui laba rugi	551.320.000	-	-	-	551.320.000
Nilai wajar melalui penghasilan komprehensif lain	2.197.950.643	-	-	-	2.197.950.643
Biaya perolehan diamortisasi	617.550.113	-	-	-	617.550.113
Efek-efek yang dibeli dengan janji dijual kembali	3.047.732.345	-	-	-	3.047.732.345
Tagihan lainnya	23.745.047	-	-	-	23.745.047
Kredit yang diberikan					
Menengah	7.945.776.224	2.361.381.238	-	3.198.160.686	13.505.318.148
Ritel	2.812.813.432	1.016.562.305	78.702.917	920.244.412	4.828.323.066
Konsumer	921.473.983	159.294.552	26.823.114	50.700.929	1.158.292.578
Penyertaan saham	-	297.658	-	-	297.658
Aset lain-lain ¹⁾	38.621.239	53.845.518	-	-	92.466.757
Total	20.481.617.379	3.871.979.749	105.526.031	4.169.106.027	28.628.229.186

¹⁾ Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain

Kualitas kredit didefinisikan sebagai berikut:

Tingkat tinggi

- (a) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain yaitu giro atau penempatan pada institusi Pemerintah, institusi Pemerintah Daerah, bank yang terdaftar di bursa serta transaksi dengan bank yang memiliki reputasi baik dengan tingkat kemungkinan gagal bayar atas kewajiban yang rendah.
- (b) Efek-efek yaitu efek-efek yang dikeluarkan oleh Pemerintah, efek-efek dan obligasi yang termasuk dalam *investment grade* dengan rating minimal idBBB (Pefindo), BBB+ (S&P), Baa1 (Moody's) atau BBB+ (Fitch).

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

The table below shows financial assets quality per class of assets for all financial assets exposed by credit risk (gross of allowance for impairment losses) (continued):

er 31, 2020

Mengalami penurunan nilai/ impaired		Total	
			Assets
			Current accounts with
-	756.177.533		Bank Indonesia
-	332.095.870		Current accounts with other banks
			Placement with Bank Indonesia
-	1.516.959.428		and other banks
			Securities
-	551.320.000		Fair value through profit or loss
			Fair value through other
-	2.197.950.643		comprehensive income
-	617.550.113		Amortized cost
-	3.047.732.345		Securities purchased under
-	23.745.047		agreement to resell
			Other receivables
			Loans
3.198.160.686	13.505.318.148		Middle
920.244.412	4.828.323.066		Retail
50.700.929	1.158.292.578		Consumer
-	297.658		Investment in shares of stocks
-	92.466.757		Other assets ¹⁾
4.169.106.027	28.628.229.186		Total

¹⁾ Other assets consist of interest receivables and other receivables

Credit quality are defined as follows:

High grade

- (a) Current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks are current accounts or placements with the Government institutions, Local Government institutions, banks listed in the stock exchange and transaction with reputable banks with low probability of insolvency.
- (b) Securities are government securities, investment grade securities and bonds with a rating of at least idBBB (Pefindo), BBB+ (S&P), Baa1 (Moody's) or BBB+ (Fitch).

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Manajemen Risiko Kredit (lanjutan)

(ii) Kualitas aset keuangan (lanjutan)

Tingkat tinggi (lanjutan)

- (c) Tagihan lainnya yaitu tagihan kepada pihak ketiga yang belum jatuh tempo dan memiliki kapasitas finansial yang kuat dalam hal pembayaran kembali seluruh kewajibannya tepat waktu.
- (d) Kredit yang diberikan yaitu kredit kepada debitur dengan riwayat pembayaran yang baik dan tidak pernah direstrukturisasi, memiliki kemampuan membayar dan rasio-rasio laporan posisi keuangan yang konservatif.
- (e) Penyertaan saham adalah investasi bank pada entitas lain dengan kepemilikan dibawah 20%. Entitas tersebut merupakan institusi Pemerintah atau institusi Pemerintah Daerah.
- (f) Aset lain-lain yaitu piutang bunga kepada Pemerintah atau Pemerintah Daerah seperti Pendapatan Bunga yang Masih Harus Diterima (PYMHD) atas obligasi Pemerintah dan piutang lainnya.

Tingkat standar

- (a) Giro pada bank lain, penempatan pada bank lain yaitu giro atau penempatan pada bank yang tidak terdaftar di bursa.
- (b) Efek-efek dan obligasi yaitu efek-efek dan obligasi yang termasuk dalam *non-investment grade* dengan rating minimal idBB (Pefindo), BBB- (S&P), Baa3 (Moody's) atau BBB- (Fitch).
- (c) Tagihan lainnya kepada pihak ketiga yang belum jatuh tempo dan memiliki kapasitas finansial yang memadai dalam hal pembayaran kembali seluruh kewajibannya tepat waktu.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

High grade (continued)

- (c) Other receivables, namely receivables from third parties that are not past due and have strong financial capacity to repay all obligations on time.
- (d) Loans are loans to borrowers with satisfactory track record of loan repayment and whose accounts has never been restructured, have repayment capacity and has conservative statement of financial position ratios.
- (e) Investment in shares of stocks are investment by the bank in other entities with ownership below 20%. The entities are Government institutions or Local Government institutions.
- (f) Other assets are interest receivables from Government or Local Government such as: interest receivables from Government bonds and other receivables.

Standard grade

- (a) Current accounts with other banks, placement with other banks are current accounts or placements with non-listed banks.
- (b) Securities and bonds are non-investment grade securities and bonds with a rating of at least idBB (Pefindo), BBB- (S&P), Baa3 (Moody's) or BBB- (Fitch).
- (c) Other receivables to third parties that are not past due and have adequate financial capacity to repay all obligations on time.

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Manajemen Risiko Kredit (lanjutan)

(ii) Kualitas aset keuangan (lanjutan)

Kualitas kredit didefinisikan sebagai berikut (lanjutan):

Tingkat standar (lanjutan)

- (d) Kredit yang diberikan yaitu kredit kepada debitur dengan riwayat pembayaran yang baik, debitur dengan riwayat pernah direstrukturisasi, akses terbatas untuk memperoleh pendanaan dalam jumlah besar dari pasar terbuka, tingkat pendapatan dan kinerja keseluruhan tidak stabil, memiliki kemampuan membayar yang cukup.
- (e) Penyertaan saham adalah investasi bank pada entitas lain selain institusi Pemerintah dengan kepemilikan dibawah 20%.
- (f) Aset lain-lain yaitu aset keuangan lainnya selain piutang bunga kepada Pemerintah atau Pemerintah Daerah seperti tagihan rupa-rupa kepada pihak ketiga lainnya.

Analisa kualitas kredit

Pengukuran kerugian kredit ekspektasian

(a) Peningkatan risiko kredit secara signifikan

Ketika menentukan apakah risiko gagal bayar pada instrumen keuangan telah meningkat secara signifikan sejak pengakuan awal, Bank mempertimbangkan informasi yang wajar dan terdukung, serta relevan yang tersedia tanpa biaya atau upaya yang berlebihan. Hal tersebut mencakup informasi dan analisa kuantitatif dan kualitatif, berdasarkan pada pengalaman historis dan penilaian pakar kredit dan termasuk perkiraan masa depan (forward-looking).

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality are defined as follows (continued):

Standard grade (continued)

- (d) Loans are loans to borrowers with an average track record of loan repayment, borrowers whose accounts has been restructured, limited access to raise substantial amounts of funds through public market, volatile earnings and overall performance, adequate repayment capacity.
- (e) Investment in shares of stocks are investment by the bank in other entities other than government institution with ownership below 20%.
- (f) Other assets are financial assets other than interest receivables from Government or Local Government such as other receivables to third parties.

Credit quality analysis

Measurement of Expected Credit Loss

(a) Significant increase in credit risk

When determining whether the risk of default on a financial instrument has increased significantly since initial recognition, the Bank considers reasonable and supportable, relevant information available without undue cost or effort. It includes quantitative and qualitative information and analysis, based on historical experience and credit expert judgment and includes forward-looking estimates.

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Manajemen Risiko Kredit (lanjutan)

(ii) Kualitas aset keuangan (lanjutan)

Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian
(lanjutan)

(a) Peningkatan risiko kredit secara signifikan
(lanjutan)

Tujuan dari penilaian ini adalah untuk mengidentifikasi apakah peningkatan risiko kredit secara signifikan atas eksposur telah terjadi dengan membandingkan:

- (1) *Probability of Default* (PD) atas umur tersisa pada tanggal pelaporan; dengan
- (2) *Probability of Default* (PD) atas umur tersisa yang diestimasi pada saat pengakuan awal eksposur (jika relevan, disesuaikan dengan perubahan ekspektasi pembayaran dimuka).

Bank juga menggunakan kriteria berikut dalam menentukan apakah peningkatan risiko kredit secara signifikan atas eksposur telah terjadi:

- (1) Pengujian kuantitatif berdasarkan perubahan *Probability of Default* (PD).
- (2) Indikator kualitatif.
- (3) Tertunggak lebih dari 30 hari.

(b) *Credit risk grades*

Bank mengalokasikan setiap eksposur ke *credit risk grades* berdasarkan variasi data yang ditentukan dapat memprediksi risiko gagal bayar dan menerapkan pengalaman atas kredit. *Credit risk grades* ditetapkan menggunakan faktor kualitatif dan kuantitatif yang dapat mengindikasikan risiko gagal bayar. Faktor-faktor ini bervariasi tergantung pada sifat eksposur dan jenis peminjam.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) *Financial assets quality (continued)*

Credit quality analysis (continued)

Measurement of Expected Credit Loss
(continued)

(a) *Significant increase in credit risk
(continued)*

The purpose of this assessment is to identify whether a significant increase in credit risk to exposure has occurred by comparing:

- (1) Probability of Default (PD) for the remaining life at the reporting date; with*
- (2) Probability of Default (PD) for the remaining life estimated at the initial recognition of the exposure (if relevant, adjusted for changes in expected prepayment).*

The Bank also uses the following criteria in determining whether a significant increase in credit risk for exposure has occurred:

- (1) Quantitative testing based on changes in Probability of Default (PD).*
- (2) Qualitative indicators.*
- (3) There are more than 30 days in arrears.*

(b) *Credit risk grades*

The bank allocates each exposure to credit risk grades based on the determined data variations that can predict the risk of default and apply experience on credit. Credit risk grades are determined using qualitative and quantitative factors that can indicate the risk of default. These factors vary depending on the nature of the exposure and the type of borrower.

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Manajemen Risiko Kredit (lanjutan)

(ii) Kualitas aset keuangan (lanjutan)

Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian
(lanjutan)

(b) *Credit risk grades* (lanjutan)

Credit risk grades ditetapkan dan dikalibrasi sedemikian rupa sehingga risiko terjadinya gagal bayar meningkat secara eksponensial seiring dengan penurunan risiko kredit, sebagai contoh, selisih antara *credit risk rating grades* 1 dan 2 lebih kecil dari pada selisih antara *credit risk rating grades* 2 dan 3.

Setiap eksposur dialokasikan ke *credit risk grades* pada pengakuan awal berdasarkan informasi yang tersedia tentang peminjam. Eksposur ini dipantau secara berkelanjutan, dan dapat mengakibatkan eksposur dipindahkan ke *credit risk grades* yang berbeda. Pemantauan biasanya menggunakan data berikut: laporan keuangan, penggunaan fasilitas kredit, estimasi kondisi ekonomi.

(c) Penentuan struktur *Probability of Default*

Credit risk grades adalah *input* utama dalam penentuan struktur *PD term structure* atas eksposur. Bank mengumpulkan informasi kinerja dan gagal bayar tentang eksposur risiko kredit yang dianalisa berdasarkan yurisdiksi atau wilayah dan menurut jenis produk dan peminjam serta penilaian risiko kredit. Untuk beberapa portofolio, informasi yang dibeli dari penilai kredit eksternal juga digunakan.

Bank menggunakan model statistik untuk menganalisa data yang dikumpulkan dan menghasilkan perkiraan *Probability of Default* (PD) atas umur tersisa dan bagaimana hal ini diperkirakan akan berubah sebagai akibat dari berlalunya waktu.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) *Financial assets quality* (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss
(continued)

(b) *Credit risk grades* (continued)

Credit risk grades are defined and calibrated in such a way that the risk of default increases exponentially as credit risk decreases, for example, the difference between credit risk rating grades 1 and 2 is less than the difference between credit risk rating grades 2 and 3.

Each exposure is allocated to credit risk grades at initial recognition based on information available about the borrower. These exposures are monitored on an ongoing basis, and can result in the exposure being transferred to different credit risk grades. Monitoring usually uses the following data: financial reports, use of credit facilities, estimates of economic conditions.

(c) *Determination of the Probability of Default structure*

Credit risk grades are the main input in determining the *PD term structure* for exposure. The Bank collects performance and default information about credit risk exposures which are analyzed by jurisdiction or region and by product and borrower type as well as credit risk assessment. For some portfolios, information purchased from external credit assessors is also used.

The bank uses a statistical model to analyze the data collected and generates a *Probability of Default* (PD) estimate of the remaining life and how this is expected to change as a result of the passage of time.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(ii) Kualitas aset keuangan (lanjutan)

Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian
(lanjutan)

(c) Penentuan struktur *Probability of Default*
(lanjutan)

Analisa ini mencakup identifikasi dan kalibrasi hubungan antara perubahan tingkat gagal bayar dan perubahan dalam faktor-faktor makro ekonomi utama serta analisa mendalam tentang dampak faktor-faktor lain tertentu (misalkan restrukturisasi) pada risiko gagal bayar. Untuk sebagian besar eksposur, indikator makro ekonomi utama meliputi: Pertumbuhan Domestik Bruto (PDB), suku bunga acuan, dan tingkat pengangguran. Untuk eksposur pada industri dan/atau wilayah tertentu, analisa dapat mencakup harga komoditas dan/atau harga properti yang relevan.

(d) Penentuan terjadinya peningkatan risiko kredit secara signifikan

Kriteria untuk menentukan apakah risiko kredit telah meningkat secara signifikan bervariasi untuk setiap portofolio dan termasuk perubahan kuantitatif pada PD dan faktor kualitatif, termasuk penentuan berdasarkan status hari tunggakan.

Risiko kredit dari eksposur tertentu dianggap telah meningkat secara signifikan sejak pengakuan awal jika, berdasarkan permodelan kuantitatif Bank, *Probability of Default* (PD) atas umur tersisa telah meningkat signifikan.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss
(continued)

(c) Determination of the *Probability of Default*
structure (continued)

This analysis includes identifying and calibrating the relationship between changes in default rates and changes in key macroeconomic factors as well as an in-depth analysis of the impact of certain other factors (such as restructuring) on default risk. For most exposures, the main macroeconomic indicators include: Gross Domestic Product (GDP), the benchmark interest rate, and the unemployment rate. For exposures to specific industries and / or regions, the analysis may include relevant commodity and / or property prices.

(d) Determination of occurrence of significant increase in credit risk

The criteria for determining whether credit risk has increased significantly varies for each portfolio and includes quantitative changes in PD and qualitative factors, including a determination based on the status of the arrears day.

The credit risk of a particular exposure is considered to have increased significantly since initial recognition if, based on the Bank's quantitative modeling, the *Probability of Default* (PD) over the remaining life has increased significantly.

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Pengukuran kerugian kredit ekspektasian
(lanjutan)

(d) Penentuan terjadinya peningkatan risiko kredit secara signifikan (lanjutan)

Bank juga dapat menggunakan penilaian dari analisis kredit dan, jika mungkin, pengalaman historis yang relevan, dalam menentukan bahwa mungkin eksposur telah mengalami peningkatan risiko kredit yang signifikan berdasarkan indikator kualitatif tertentu yang dianggap dapat mengindikasikan hal tersebut dan pengaruhnya mungkin tidak sepenuhnya tercermin dalam analisis kuantitatif secara tepat waktu.

Bank menentukan bahwa peningkatan risiko kredit secara signifikan belum terjadi apabila masih kurang dari 30 hari tunggakan. Hari tunggakan ditentukan dengan menghitung jumlah hari sejak tanggal jatuh tempo awal dimana pembayaran penuh belum diterima. Tanggal jatuh tempo ditentukan tanpa mempertimbangkan masa tenggang yang mungkin tersedia bagi peminjam.

Bank memantau efektivitas kriteria yang digunakan dalam mengidentifikasi peningkatan risiko kredit yang signifikan dengan cara review berkala.

(e) Modifikasi aset keuangan

Ketentuan kontraktual pinjaman dapat dimodifikasi untuk beberapa alasan, termasuk perubahan kondisi pasar, retensi pelanggan dan faktor-faktor lain yang tidak terkait dengan penurunan kredit saat pinjaman yang ketentuan kontraktualnya dimodifikasi dapat menyebabkan pinjaman awal dihentikan pengakuannya dan pinjaman hasil modifikasi diakui sebagai pinjaman baru pada nilai wajar.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss
(continued)

(d) Determination of occurrence of significant increase in credit risk (continued)

The bank may also use the judgment of a credit analyst and, if possible, relevant historical experience, in determining that it is possible that the exposure has been subject to a significant increase in credit risk based on certain qualitative indicators that are deemed to indicate this and the effect may not be fully reflected in a quantitative analysis on time.

The Bank determines that a significant increase in credit risk has not occurred if there are less than 30 days in arrears. The days in arrears are determined by counting the number of days from the original due date for which full payment has not been received. The maturity date is determined without considering the grace period that may be available to the borrower.

The Bank monitors the effectiveness of the criteria used in identifying significant increases in credit risk by means of periodic reviews.

(e) Modification of financial assets

The contractual terms of a loan can be modified for a number of reasons, including changes in market conditions, customer retention and other factors that are not related to credit decline when a loan whose contractual terms is modified can cause the original loan to be derecognized and the modified loan recognized as a new loan at fair value.

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(ii) Kualitas aset keuangan (lanjutan)

Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian (lanjutan)

(e) Modifikasi aset keuangan (lanjutan)

Ketika ketentuan kontraktual pinjaman dimodifikasi dan tidak mengakibatkan penghentian pengakuan, penentuan terjadinya peningkatan risiko kredit secara signifikan dilakukan dengan cara membandingkan:

- Sisa PD sepanjang umur pada tanggal pelaporan berdasarkan ketentuan yang dimodifikasi; dengan
- Sisa PD sepanjang umur yang diestimasi berdasarkan data pada saat pengakuan awal dan ketentuan kontraktual awal.

(f) Definisi gagal bayar (default)

Bank menganggap aset keuangan dalam keadaan gagal bayar ketika:

- Debitur tidak mungkin membayar kewajiban kreditnya secara penuh, tanpa bantuan (recourse) dari kelompok usahanya; atau
- Debitur telah melewati jatuh tempo lebih dari 90 hari atas kewajiban kredit material apa pun kepada kelompok usahanya.

Dalam menilai apakah debitur dalam keadaan gagal bayar, Bank mempertimbangkan indikator berikut:

- Kualitatif, seperti pelanggaran persyaratan perjanjian (covenants);
- Kuantitatif, seperti status tunggakan; dan
- Berdasarkan data yang dikembangkan secara internal dan diperoleh dari sumber eksternal.

Bank menggunakan informasi *forward-looking* dalam menilai apakah telah terjadinya peningkatan risiko kredit secara signifikan dan pengukuran kerugian kredit ekspektasian.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss (continued)

(e) Modification of financial assets (continued)

When the contractual terms of a loan are modified and do not result in derecognition, determining the occurrence of a significant increase in credit risk is made by comparing:

- Remaining PD throughout the life at the reporting date based on the modified provisions; with
- Remaining PD throughout life estimated based on data at initial recognition and initial contractual terms.

(f) Definition of Default

The bank considers a financial asset to be in default when:

- It is impossible for the debtor to pay his credit obligation in full, without recourse from his business group; or
- The debtor has more than 90 days past due for any material credit obligations to the group.

In assessing whether the debtor is in default, the Bank considers the following indicators:

- Qualitative, such as breaches of covenants;
- Quantitative, such as status in arrears; and
- Based on data developed internally and obtained from external sources.

The Bank uses forward-looking information in assessing whether there has been a significant increase in credit risk and in measuring expected credit losses.

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(ii) Kualitas aset keuangan (lanjutan)

Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian
(lanjutan)

- (g) Input, asumsi, dan teknik yang digunakan dalam mengestimasi penurunan nilai

Penggunaan informasi perkiraan masa depan (forward-looking)

Berdasarkan saran dari Komite Manajemen Risiko, pakar ekonomi dan pertimbangan berbagai informasi aktual dan perkiraan eksternal, Bank merumuskan pandangan dasar (base case) tentang pergerakan variabel ekonomi yang relevan dimasa depan serta perkiraan skenario lain yang mungkin terjadi. Proses ini meliputi pengembangan dua atau lebih skenario ekonomi tambahan dan mempertimbangkan probabilitas relatif dari keluaran (output) yang mungkin. Informasi eksternal mencakup data ekonomi dan perkiraan yang diterbitkan oleh, seperti badan pemerintah dan analis sektor swasta dan akademisi terpilih.

Pandangan dasar (base case) mencerminkan keluaran dengan probabilitas yang paling tinggi dan digunakan dalam perencanaan strategis dan anggaran. Skenario yang lain, mencerminkan keluaran yang lebih optimis dan keluaran yang lebih pesimis.

Skenario ekonomi yang dirumuskan menggunakan kisaran indikator utama berikut:

	2022	2021	
Pertumbuhan PDB	Dasar/Base 5,02% Kisaran antara 3,98 hingga 5,18%/ Ranges from 3.98 to 5.18%	Dasar/Base -0,89% Kisaran antara -1,21 hingga -0,59%/ Ranges from -1.21 to -0.59%	GDP Growth
Tingkat Konsumsi	Dasar/Base 3,55% Kisaran antara 1,86 hingga 3,78%/ Ranges from 1.86 to 3.78%	Dasar/Base 1,97% Kisaran antara -1,38 hingga 2,87%/ Ranges from -1.38 to 2.87%	Consumption Rate
Tingkat Investasi	Dasar/Base 3,80% Kisaran antara 1,97 hingga 5,12%/ Ranges from 1.97 to 5.12%	Dasar/Base 6,71% Kisaran antara 0,95 hingga 7,17%/ Ranges from 0.95 to 7.17%	Investment Rate

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss
(continued)

- (g) Inputs, assumptions, and techniques used to estimate impairment

Use of forward-looking information

Based on suggestions from the Risk Management Committee, economic experts and consideration of various actual and external forecast information, the Bank formulates a basic view (base case) on the movement of relevant economic variables in the future as well as other possible scenario estimates. This process involves developing two or more additional economic scenarios and considering the relative probability of possible outputs. External information includes economic data and forecasts published by, such as government agencies and selected private sector analysts and academics.

The basic view (base case) reflects the output with the highest probability and is used in strategic planning and budgeting. The other scenario reflects a more optimistic output and a more pessimistic outcome.

The economic scenario is formulated using the following main indicator ranges:

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(ii) Kualitas aset keuangan (lanjutan)

Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian
(lanjutan)

- (g) Input, asumsi, dan teknik yang digunakan dalam mengestimasi penurunan nilai (lanjutan)

Pengukuran kerugian kredit ekspektasian

Input utama dalam pengukuran kerugian kredit ekspektasian adalah variabel berikut:

- *Probability of Default* (PD)
- *Loss of Given Default* (LGD)
- *Exposure at Default* (EAD)

Parameter ini umumnya berasal dari model statistik yang dikembangkan secara internal dan data historis lainnya. Parameter ini disesuaikan untuk mencerminkan informasi *forward-looking*.

Estimasi PD adalah estimasi pada tanggal tertentu, yang dihitung berdasarkan model peringkat statistik, dan dinilai menggunakan *rating* yang disesuaikan dengan berbagai kategori dari debitur dan eksposur. Model statistik ini didasarkan pada data yang disusun secara internal yang terdiri dari faktor kuantitatif dan kualitatif.

LGD adalah besarnya kerugian jika terjadi gagal bayar. Parameter LGD diestimasi secara historis berdasarkan tingkat pemulihan atas klaim terhadap debitur yang gagal bayar. Model LGD mempertimbangkan struktur, jaminan, senioritas klaim, industri debitur, dan biaya pemulihan setiap jaminan yang merupakan bagian integral dari aset keuangan.

EAD merepresentasikan estimasi eksposur jika terjadi gagal bayar. EAD suatu aset keuangan adalah jumlah tercatat bruto.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss
(continued)

- (g) Inputs, assumptions, and techniques used to estimate impairment (continued)

Measurement of Expected Credit Loss

The main inputs in measuring expected credit losses are the following variables:

- *Probability of Default* (PD)
- *Loss of Given Default* (LGD)
- *Exposure at Default* (EAD)

These parameters generally come from internally developed statistical models and other historical data. This parameter is adjusted to reflect forward-looking information.

Probability of Default (PD) estimation is an estimate at a specific date, calculated based on a statistical ranking model, and assessed using a rating adjusted for various categories of debtors and exposures. This statistical model is based on internally compiled data consisting of quantitative and qualitative factors.

Loss of Given Default (LGD) is the amount of loss in the event of default. The LGD parameter is estimated historically based on the rate of recovery of claims against defaulters. The LGD model considers the structure, guarantees, seniority of claims, the debtor's industry, and the cost of recovery of each guarantee that is an integral part of a financial asset.

Exposure at Default (EAD) represents the estimated exposure in case of default. The EAD of a financial asset is the gross carrying amount.

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Analisa kualitas kredit (lanjutan)

Pengukuran kerugian kredit ekspektasian (lanjutan)

- (g) Input, asumsi, dan teknik yang digunakan dalam mengestimasi penurunan nilai (lanjutan)

Pengukuran kerugian kredit ekspektasian (lanjutan)

EAD merepresentasikan estimasi eksposur jika terjadi gagal bayar. EAD suatu aset keuangan adalah jumlah tercatat bruto. Untuk komitmen pinjaman dan jaminan keuangan, EAD mencakup jumlah yang telah ditarik, serta jumlah potensial di masa depan yang akan ditarik, yang diestimasi berdasarkan pengamatan historis dan perkiraan berwawasan ke depan (forward-looking).

Ketika pemodelan parameter dilakukan secara kolektif, instrumen keuangan dikelompokkan berdasarkan kesamaan karakteristik risiko yang meliputi:

- jenis instrumen;
- peringkat risiko kredit;
- jenis agunan;
- tanggal pengakuan awal;
- sisa waktu jatuh tempo.

Berdasarkan PSAK 60, aset keuangan yang telah jatuh tempo ditentukan ketika debitur gagal melakukan pembayaran sesuai jadwal. Tabel di bawah menunjukkan *aging analysis* terhadap kredit yang diberikan yang telah jatuh tempo tetapi tidak mengalami penurunan nilai:

	31 Desember/December 31, 2021				
	≤ 30 hari/ ≤ 30 days	31 - 60 hari/ 31 - 60 days	61 - 90 hari/ 61 - 90 days	> 90 hari/ > 90 days	Total
Kredit yang diberikan					
Menengah	60.975.308	-	-	-	60.975.308
Ritel	162.844.886	3.109.500	-	-	165.954.386
Konsumer	48.385.273	142.203	-	-	48.527.476
Total	272.205.467	3.251.703	-	-	275.457.170

Loans
Middle
Retail
Consumer

Total

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss (continued)

- (g) Inputs, assumptions, and techniques used to estimate impairment (continued)

Measurement of Expected Credit Loss (continued)

Exposure at Default (EAD) represents the estimated exposure in case of default. The EAD of a financial asset is the gross carrying amount. For loan commitments and financial guarantees, EAD includes the amount that has been drawn, as well as the potential future amount that will be withdrawn, which is estimated based on historical observations and forward-looking estimates.

When the modeling of parameters is carried out collectively, financial instruments are grouped based on similar risk characteristics which include:

- Type of instrument;
- Credit risk rating;
- Collateral type;
- The date of initial recognition;
- Remaining maturity.

According to SFAS 60, financial asset is due when the repayment is default. The table below shows aging analysis of past-due but not impaired loans:

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Pengukuran kerugian kredit ekspektasian (lanjutan)

(g) Input, asumsi, dan teknik yang digunakan dalam mengestimasi penurunan nilai (lanjutan)

Pengukuran kerugian kredit ekspektasian (lanjutan)

31 Desember/December 31, 2020					
	≤ 30 hari/ ≤ 30 days	31 - 60 hari/ 31 - 60 days	61 - 90 hari/ 61 - 90 days	> 90 hari/ > 90 days	Total
Kredit yang diberikan					
Ritel	78.702.917	-	-	-	78.702.917
Konsumer	26.644.275	178.747	-	92	26.823.114
Total	105.347.192	178.747	-	92	105.526.031

Loans
Retail
Consumer
Total

(iii) Analisa konsentrasi risiko

(a) Sektor geografis

Tabel berikut menggambarkan rincian eksposur kredit yang dikategorikan berdasarkan wilayah geografis pada tanggal-tanggal 31 Desember 2021 dan 2020, dimana pengelompokan wilayah geografis berdasarkan pada tempat beroperasinya bisnis Bank yang sekaligus menggambarkan potensial bisnis di wilayah masing-masing:

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(ii) Financial assets quality (continued)

Credit quality analysis (continued)

Measurement of Expected Credit Loss (continued)

(g) Inputs, assumptions, and techniques used to estimate impairment (continued)

Measurement of Expected Credit Loss (continued)

(iii) Risk concentration analysis

(a) Geographical sectors

The following tables show the details of credit exposures categorized by geographic area as of December 31, 2021 and 2020, where the geographic grouping are based on the Bank's business operational regions which also illustrates the business potential of each region:

31 Desember/December 31, 2021						
	Jabodetabek	Jawa/ Java	Sumatera	Kalimantan/ Borneo	Sulawesi	Total
Aset						
Giro pada Bank Indonesia	557.506.779	-	-	-	-	557.506.779
Giro pada bank lain	192.644.988	61.946	67.880	10.000	10.000	192.794.815
Penempatan pada Bank Indonesia dan bank lain	1.374.721.241	5.738	-	-	-	1.374.726.979
Efek-efek						
Nilai wajar melalui laba rugi	159.934.000	-	-	-	-	159.934.000
Nilai wajar melalui penghasilan komprehensif lain	2.320.510.098	-	-	-	-	2.320.510.098
Biaya perolehan diamortisasi	1.015.067.512	-	-	-	-	1.015.067.512
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	-	-	-	-	650.377.813
Tagihan lainnya	-	-	-	-	-	-
Kredit yang diberikan						
Menengah	6.757.920.395	44.797.705	247.615.319	-	6.966.984	7.057.300.402
Ritel	2.589.185.465	334.932.457	586.932.125	-	82.274.024	3.593.324.073
Konsumer	398.465.375	139.047.552	389.223.811	-	30.966.184	957.702.923
Tagihan Akseptasi	92.561.485	-	-	-	-	92.561.485
Penyertaan saham	77.510	-	-	-	-	77.510

Assets
Current accounts with Bank Indonesia
Current accounts with other banks
Placements with Bank Indonesia and other banks
Securities
Fair value through profit or loss
Fair value through other comprehensive income
Amortized cost
Securities purchased under agreement to resell
Other receivables
Loans
Middle
Retail
Consumer
Acceptance
Investment in shares of stocks

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iii) Analisa konsentrasi risiko (lanjutan)

(a) Sektor geografis (lanjutan)

Tabel berikut menggambarkan rincian eksposur kredit yang dikategorikan berdasarkan wilayah geografis pada tanggal-tanggal 31 Desember 2021 dan 2020, dimana pengelompokan wilayah geografis berdasarkan pada tempat beroperasinya bisnis Bank yang sekaligus menggambarkan potensial bisnis di wilayah masing-masing (lanjutan):

31 Desember/December 31, 2021							
	Jabodetabek	Jawa/ Java	Sumatera	Kalimantan/ Borneo	Sulawesi	Total	
Aset lain-lain ^{*)}	74.688.403	114.396	196.978	-	7.500	75.007.277	Other assets ^{*)}
Total	16.183.661.066	518.959.794	1.224.036.114	10.000	120.224.693	18.046.891.667	Total
Cadangan kerugian penurunan nilai						(1.879.305.710)	Allowance for impairment losses
Neto						16.167.585.956	Net
Rekening Administratif							Administrative accounts
Fasilitas kredit yang belum ditarik ^{**)}	433.196.143	31.555.919	111.402.219	-	10.209.814	586.364.095	Unused loan facility ^{**)}
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	2.049.054	-	-	-	-	2.049.054	Irrevocable L/C
Garansi yang diterbitkan	5.712.703	78.553	30.754	-	-	5.822.010	Guarantees issued
Total	440.957.900	31.634.472	111.432.973	-	10.209.814	594.235.159	Total
31 Desember/December 31, 2020							
	Jabodetabek	Jawa/ Java	Sumatera	Kalimantan/ Borneo	Sulawesi	Total	
Aset							Assets
Giro pada Bank Indonesia	756.177.533	-	-	-	-	756.177.533	Current accounts with Bank Indonesia
Giro pada bank lain	331.927.671	60.665	77.534	20.000	10.000	332.095.870	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	1.516.953.455	5.973	-	-	-	1.516.959.428	Placements with Bank Indonesia and other banks
Efek-efek							Securities
Nilai wajar melalui laba rugi	551.320.000	-	-	-	-	551.320.000	Fair value through profit or loss
Nilai wajar melalui penghasilan komprehensif lain	2.197.950.643	-	-	-	-	2.197.950.643	Fair value through other comprehensive income
Biaya perolehan diamortisasi	617.550.113	-	-	-	-	617.550.113	Amortized cost
Efek-efek yang dibeli dengan janji dijual kembali	3.047.732.345	-	-	-	-	3.047.732.345	Securities purchased under agreement to resell
Tagihan lainnya	23.745.047	-	-	-	-	23.745.047	Other receivables
Kredit yang diberikan							Loans
Menengah	11.981.527.574	209.347.717	483.551.652	764.637.312	66.253.893	13.505.318.148	Middle
Ritel	1.981.706.148	427.046.574	1.048.386.412	1.296.810.100	74.373.832	4.828.323.066	Retail
Konsumer	370.101.724	181.779.817	538.673.214	35.717.456	32.020.367	1.158.292.578	Consumer
Penyerahan saham	297.658	-	-	-	-	297.658	Investment in shares of stocks
Aset lain-lain ^{*)}	78.603.722	6.712.749	2.392.466	4.647.750	110.070	92.466.757	Other assets ^{*)}
Total	23.455.593.633	824.953.495	2.073.081.278	2.101.832.618	172.768.162	28.628.229.186	Total
Cadangan kerugian penurunan nilai						(1.013.484.143)	Allowance for impairment losses
Neto						27.614.745.043	Net
Rekening Administratif							Administrative accounts
Fasilitas kredit yang belum ditarik ^{**)}	702.584.425	78.686.754	126.232.149	23.513.577	11.672.235	942.689.140	Unused loan facility ^{**)}
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	14.328.754	-	-	-	-	14.328.754	Irrevocable L/C
Garansi yang diterbitkan	58.268.115	7.420	305.087	-	-	58.580.622	Guarantees issued
Total	775.181.294	78.694.174	126.537.236	23.513.577	11.672.235	1.015.598.516	Total

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain
^{**)} Hanya fasilitas kredit komitmen yang belum ditarik.

^{*)} Other assets consist of interest receivables and other receivables
^{**)} Only for committed unused loan facility

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iii) Analisa konsentrasi risiko (lanjutan)

(b) Sektor industri

Tabel berikut menggambarkan rincian eksposur kredit pada nilai tercatat yang dikategorikan berdasarkan sektor industri pada tanggal-tanggal 31 Desember 2021 dan 2020:

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(iii) Risk concentration analysis (continued)

(b) Industrial sectors

The following tables provide the details of the credit exposure at the carrying amounts categorized by industry sector as of December 31, 2021 and 2020:

31 Desember/December 31, 2021						
	Pemerintah (termasuk Bank Indonesia)/ Government (including Bank Indonesia)	Bank dan lembaga keuangan lainnya/ Banks and other financial institutions	Perusahaan lainnya/ Other companies	Perseorangan/ Individuals	Total	
Aset						Assets
Giro pada Bank Indonesia	557.506.779	-	-	-	557.506.779	Current accounts with Bank Indonesia
Giro pada bank lain	-	192.794.815	-	-	192.794.815	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	1.374.721.241	5.738	-	-	1.374.726.979	Placements with Bank Indonesia and other banks
Efek-efek						Securities
Nilai wajar melalui laporan laba rugi	159.934.000	-	-	-	159.934.000	Fair value through profit or loss
Nilai wajar melalui penghasilan komprehensif lain						Fair value through other comprehensive income
Tersedia untuk dijual	2.309.800.098	10.710.000	-	-	2.320.510.098	Available for sale
Dimiliki hingga jatuh tempo	749.930.288	265.137.224	-	-	1.015.067.512	Held-to-maturity
Biaya perolehan diamortisasi						Amortized cost
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	-	-	-	650.377.813	Securities purchased under agreement to resell
Tagihan lainnya	-	-	-	-	-	Other receivables
Kredit yang diberikan						Loans
Menengah	1.687.066.802	-	5.370.233.600	-	7.057.300.402	Middle
Ritel	-	-	2.868.841.445	724.482.628	3.593.324.073	Retail
Konsumer	-	-	-	957.702.923	957.702.923	Consumer
Tagihan Akseptasi	-	-	92.561.485	-	92.561.485	Acceptance
Penyertaan saham	-	57.510	20.000	-	77.510	Investment in shares of stocks
Aset lain-lain ^{*)}	39.790.505	804.481	34.412.291	-	75.007.277	Other assets ^{*)}
Total	7.529.127.526	469.509.768	8.366.068.821	1.682.185.551	18.046.891.666	Total
Cadangan kerugian penurunan nilai					(1.879.305.710)	Allowance for impairment losses
Neto					16.167.585.957	Net
Rekening Administratif						Administrative Accounts
Fasilitas kredit yang belum ditarik ^{**)}	41.867.095	-	514.278.951	30.218.048	586.364.094	Unused loan facility ^{**)}
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	-	-	2.049.054	-	2.049.054	Irrevocable L/C
Garansi yang diterbitkan	-	972.887	4.849.123	-	5.822.010	Guarantees issued
Total	41.867.095	972.887	521.177.128	30.218.048	594.235.158	Total

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain
^{**)} Hanya fasilitas kredit komitmen yang belum ditarik.

^{*)} Other assets consist of interest receivables and other receivables
^{**)} Only for committed unused loan facility

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iii) Analisa konsentrasi risiko (lanjutan)

(b) Sektor industri (lanjutan)

Tabel berikut menggambarkan rincian eksposur kredit pada nilai tercatat yang dikategorikan berdasarkan sektor industri pada tanggal-tanggal 31 Desember 2021 dan 2020 (lanjutan):

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(iii) Risk concentration analysis (continued)

(b) Industrial sectors (continued)

The following tables provide the details of the credit exposure at the carrying amounts categorized by industry sector as of December 31, 2021 and 2020 (continued):

31 Desember/December 31, 2020						
	Pemerintah (termasuk Bank Indonesia)/ Government (including Bank Indonesia)	Bank dan lembaga keuangan lainnya/ Banks and other financial institutions	Perusahaan lainnya/ Other companies	Perseorangan/ Individuals	Total	
Aset						Assets
Giro pada Bank Indonesia	756.177.533	-	-	-	756.177.533	Current accounts with Bank Indonesia
Giro pada bank lain	-	332.095.870	-	-	332.095.870	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	1.516.953.455	5.973	-	-	1.516.959.428	Placements with Bank Indonesia and other banks
Efek-efek						Securities
Nilai wajar melalui laporan laba rugi	551.320.000	-	-	-	551.320.000	Fair value through profit or loss
Nilai wajar melalui penghasilan komprehensif lain	2.142.128.143	10.575.000	45.247.500	-	2.197.950.643	Fair value through other comprehensive income
Biaya perolehan diamortisasi	458.484.733	109.065.380	50.000.000	-	617.550.113	Amortized cost
Efek-efek yang dibeli dengan janji dijual kembali	3.047.732.345	-	-	-	3.047.732.345	Securities purchased under agreement to resell
Tagihan lainnya	-	-	23.745.047	-	23.745.047	Other receivables
Kredit yang diberikan						Loans
Menengah	2.457.742.387	-	11.003.711.800	43.863.961	13.505.318.148	Middle
Ritel	-	-	3.934.018.907	894.304.159	4.828.323.066	Retail
Konsumer	-	-	-	1.158.292.578	1.158.292.578	Consumer
Penyertaan saham	-	277.658	20.000	-	297.658	Investment in shares of stocks
Aset lain-lain ^{*)}	38.531.979	266.684	48.681.411	4.986.683	92.466.757	Other assets ^{*)}
Total	10.969.070.575	452.286.565	15.105.424.665	2.101.447.381	28.628.229.186	Total
Cadangan kerugian penurunan nilai					(1.013.484.143)	Allowance for impairment losses
Neto					27.614.745.043	Net
Rekening Administratif						Administrative Accounts
Fasilitas kredit yang belum ditarik ^{**)}	111.500.000	-	766.835.039	64.354.101	942.689.140	Unused loan facility ^{**)}
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	-	-	14.328.754	-	14.328.754	Irrevocable L/C
Garansi yang diterbitkan	-	283.883	58.296.739	-	58.580.622	Guarantees issued
Total	111.500.000	283.883	839.460.532	64.354.101	1.015.598.516	Total

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain
^{**)} Hanya fasilitas kredit komitmen yang belum ditarik.

^{*)} Other assets consist of interest receivables and other receivables
^{**)} Only for committed unused loan facility

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iv) Penurunan nilai aset keuangan pada tanggal-tanggal 31 Desember 2021 dan 2020:

(a) Giro pada bank lain

Pada tanggal 31 Desember 2021 dan 2020, aset keuangan ini mengalami penurunan nilai secara kolektif.

(b) Penempatan pada Bank Indonesia dan bank lain

Pada tanggal 31 Desember 2021, aset keuangan ini tidak mengalami penurunan nilai baik secara individual maupun kolektif, sedangkan pada tanggal 31 Desember 2020, aset keuangan ini mengalami penurunan nilai secara kolektif.

(c) Efek-efek

Pada tanggal 31 Desember 2021 dan 2020, aset keuangan ini mengalami penurunan nilai secara kolektif.

(d) Efek-efek yang dibeli dengan janji dijual kembali

Pada tanggal-tanggal 31 Desember 2021 dan 2020, aset keuangan ini tidak mengalami penurunan nilai secara individual maupun kolektif.

(e) Tagihan lainnya

Pada tanggal 31 Desember 2021, aset keuangan ini tidak tersedia, sedangkan pada tanggal 31 Desember 2020, aset keuangan ini mengalami penurunan nilai secara kolektif.

(f) Tagihan akseptasi

Pada tanggal 31 Desember 2021, aset keuangan ini mengalami penurunan nilai secara kolektif, sedangkan pada tanggal 31 Desember 2021, aset keuangan ini tidak tersedia.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(iv) *Impairment of financial assets as of December 31, 2021 and 2020:*

(a) *Current accounts with other banks*

As of December 31, 2021 and 2020, this financial asset is collectively impaired.

(b) *Placements with Bank Indonesia and other banks*

As of December 31, 2021, this financial asset is not individually or collectively impaired, whereas as of December 31, 2020, this financial asset is collectively impaired.

(c) *Securities*

As of December 31, 2021 and 2020, this financial asset is collectively impaired.

(d) *Securities purchased under agreement to resell*

As of December 31, 2021 and 2020, this financial asset is not individually or collectively impaired.

(e) *Other receivables*

As of December 31, 2021, this financial asset is not available, whereas as of December 31, 2020, this financial assets is collectively impaired.

(f) *Acceptance receivables*

As of December 31, 2021, this financial asset is collectively impaired, whereas as of December 31, 2020, this financial assets is not available.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iv) Penurunan nilai aset keuangan pada tanggal-tanggal 31 Desember 2021 dan 2020 (lanjutan):

(g) Kredit yang diberikan

Pada tanggal-tanggal 31 Desember 2021 dan 2020, rincian kredit yang tidak mengalami penurunan nilai dan yang mengalami penurunan nilai adalah sebagai berikut:

31 Desember/December 31, 2021					
	Belum jatuh tempo atau tidak mengalami penurunan nilai/Neither past due nor impaired	Tingkat standar/ Standard grade	Telaah jatuh tempo tetapi tidak mengalami penurunan nilai/ Past-due but not impaired	Mengalami penurunan nilai/ impaired	Total
Rupiah					
Pertanian	2.169.633.800	90.194.218	21.248.577	2.952.579.182	5.233.655.757
Perindustrian	593.201.476	54.428.545	68.964.534	3.748.980	1.085.713.525
Perdagangan, perhotelan, restoran	970.515.112	304.061.364	84.640.397	43.464.876	1.402.681.749
Konstruksi	546.975.591	241.002.498	19.753.575	511.689.152	1.319.420.816
Jasa dunia usaha	128.094.165	126.324.090	7.488.489	57.996.657	319.903.401
Pengangkutan, pergudangan dan komunikasi	164.876.241	24.274.495	2.796.077	25.839.908	246.291.721
Listrik, gas dan air	75.681.174	4.798.837	3.566.650	56.742	84.103.403
Jasa pelayanan sosial	50.944.421	58.907.639	15.777.395	537.766	126.167.221
Pertambangan	2.389.325	6.663.882	2.694.000	-	11.747.207
Lain-lain	772.369.693	131.012.188	48.527.476	6.228.171	958.137.528
	5.474.680.998	1.041.677.756	275.457.170	3.602.141.434	10.393.947.358
Dolar Amerika Serikat					
Listrik, gas dan air	642.160.335	-	-	-	642.160.335
Pertanian	156.777.688	-	-	-	156.777.688
Perindustrian	21.567.029	-	-	365.369.988	386.937.017
Perdagangan	-	-	-	-	-
Pengangkutan, pergudangan dan komunikasi	-	-	-	28.505.000	28.505.000
	820.505.052	-	-	393.874.988	1.214.380.040
	6.295.186.050	1.041.677.756	275.457.170	3.996.016.422	11.608.327.398
Cadangan kerugian penurunan nilai					(1.875.401.843)
Neto					9.732.925.555

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(iv) Impairment of financial assets as of December 31, 2021 and 2020 (continued):

(g) Loans

As of December 31, 2021 and 2020, the details of and impaired and not impaired loans are as follows:

Rupiah	
Agriculture	
Manufacturing	
Trading, hotel and restaurant	
Construction	
Business services	
Transportation, warehousing and telecommunication	
Electricity, gas and water	
Social services	
Mining	
Others	
United States Dollar	
Electricity, gas and water	
Agriculture	
Manufacturing	
Trading	
Transportation, warehouse and telecommunication	
Allowance for impairment losses	
Net	

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iv) Penurunan nilai aset keuangan pada tanggal-tanggal 31 Desember 2021 dan 2020 (lanjutan):

(g) Kredit yang diberikan (lanjutan)

Pada tanggal-tanggal 31 Desember 2021 dan 2020, rincian kredit yang tidak mengalami penurunan nilai dan yang mengalami penurunan nilai adalah sebagai berikut (lanjutan):

31 Desember/December 31, 2020					
	Belum jatuh tempo atau tidak mengalami penurunan nilai/ <i>Neither past due nor impaired</i>	Tingkat standar/ <i>Standard grade</i>	Telah jatuh tempo tetapi tidak mengalami penurunan nilai/ <i>Past-due but not impaired</i>	Mengalami penurunan nilai/ <i>impaired</i>	Total
Rupiah	Tingkat tinggi/ <i>High grade</i>				
Pertanian	3.365.952.422	1.821.521.156	22.448.180	3.410.414.777	8.620.336.535
Perindustrian	1.901.031.126	391.077.218	8.245.810	102.479.923	2.402.834.077
Perdagangan	1.645.607.188	391.536.272	33.593.263	234.788.312	2.305.525.035
Konstruksi	1.941.504.036	68.015.732	4.616.333	150.313.106	2.164.449.207
Jasa dunia usaha	337.359.848	134.896.566	1.970.437	156.912.082	631.138.933
Pengangkutan	190.452.695	83.038.526	1.268.254	10.607.354	285.366.829
Listrik, gas dan air	121.403.484	5.203.398	-	51.588.708	178.195.590
Jasa pelayanan sosial	70.713.425	68.932.457	4.560.640	1.023.783	145.230.305
Pertambangan	4.125.798	8.442.882	2.000.000	277.053	14.845.733
Lain-lain	921.495.701	159.294.552	26.823.114	50.700.929	1.158.314.296
	10.499.645.723	3.131.958.759	105.526.031	4.169.106.027	17.906.236.540
Dolar Amerika Serikat					
Listrik, gas dan air	538.456.583	-	-	-	538.456.583
Pertanian	470.675.118	-	-	-	470.675.118
Perindustrian	44.836.215	377.179.336	-	-	422.015.551
Perdagangan	126.450.000	-	-	-	126.450.000
Pengangkutan	-	28.100.000	-	-	28.100.000
	1.180.417.916	405.279.336	-	-	1.585.697.252
	11.680.063.639	3.537.238.095	105.526.031	4.169.106.027	19.491.933.792
Cadangan kerugian penurunan nilai					(1.006.365.249)
Neto					18.485.568.543

Rupiah
Agriculture
Manufacturing
Trading
Construction
Business services
Transportation
Electricity, gas and water
Social services
Mining
Others

United States Dollar
Electricity, gas and water
Agriculture
Manufacturing
Trading
Transportation

Allowance for impairment losses

Net

(i) Aset lain-lain

Pada tanggal-tanggal 31 Desember 2021 dan 2020, aset keuangan ini tidak mengalami penurunan nilai secara individual maupun kolektif.

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(iv) Impairment of financial assets as of December 31, 2021 and 2020 (continued):

(g) Loans (continued)

As of December 31, 2021 and 2020, the details of and impaired and not impaired loans are as follows (continued):

(i) Other assets

As of December 31, 2021 and 2020, this financial asset is neither individually nor collectively impaired.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Kredit (lanjutan)

(iv) Penurunan nilai aset keuangan pada tanggal-tanggal 31 Desember 2021 dan 2020 (lanjutan):

(j) Rekening administratif

Pada tanggal 31 Desember 2021 dan 2020, aset keuangan ini mengalami penurunan nilai secara individual dan kolektif, sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Rupiah		
Fasilitas kredit yang belum ditarik	522.416.123	903.225.355
Garansi yang diterbitkan	5.822.010	57.478.990
	528.238.133	960.704.345
Dolar Amerika Serikat		
Fasilitas kredit yang belum ditarik	63.947.971	39.463.785
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	2.049.054	14.328.754
Garansi yang diterbitkan	-	1.101.632
	65.997.025	54.894.171
Total	594.235.158	1.015.598.516
Cadangan kerugian penurunan nilai	(28.247.973)	(11.079.292)
Neto	565.987.185	1.004.519.224

Manajemen Risiko Pasar

Pengelolaan manajemen risiko pasar dilakukan melalui rapat *Asset and Liability Committee* (ALCO) yang membahas manajemen risiko pasar, strategi *Asset and Liability Management* (ALMA) dan pengukuran risiko pasar melalui analisis terhadap pemicu munculnya risiko (risk driver), yaitu suku bunga dan nilai tukar. Risiko suku bunga dan risiko nilai tukar dapat berasal dari posisi *trading book* maupun *banking book*. Cakupan posisi *banking book* dan *trading book* mengacu pada ketentuan Bank Indonesia mengenai kewajiban penyediaan modal minimum (CAR).

36. RISK MANAGEMENT (continued)

Credit Risk Management (continued)

(iv) Impairment of financial assets as of December 31, 2021 and 2020 (continued):

(j) Administrative accounts

As of December 31, 2021 and 2020, this financial asset are individually and collectively impaired as follows:

Rupiah
Unused loan facilities
Guarantees Issued

United States Dollar
Unused loan facilities

Irrevocable letters of credit
Guarantees issued

Total
Allowance for impairment losses

Net

Market Risk Management

Market risk management is conducted through *Asset and Liability Committee* (ALCO) meetings which discuss market risk management, *Asset and Liability Management* (ALMA) strategy and the measurement of market risk through an analysis of the risk drivers, which are interest rates and exchange rates. Interest rate and exchange rate risks can be generated either from trading or banking book position. The scope of banking and trading book positions is in accordance with Bank Indonesia regulation concerning the capital adequacy ratio (CAR).

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

Dalam pengelolaan risiko pasar *trading book*, Bank menetapkan prinsip *segregation of duties*. Terdapat pemisahan fungsi antara pihak yang melakukan transaksi, yang melakukan pencatatan transaksi, verifikasi, unit pembuat kebijakan, prosedur dan penetapan limit serta pengukuran risiko pasarnya termasuk perhitungan CAR. Bank melakukan perhitungan CAR risiko pasar dengan menggunakan model standar sebagai komponen perhitungan CAR. Apabila terdapat *gap* terhadap eksposur aset dan liabilitas untuk risiko pasar dan risiko nilai tukar dalam periode tidak lebih dari 3 bulan, Bank memitigasinya dengan *contingent stand by credit lines* dari BRI sebagai Entitas Induk.

Risiko pasar *banking book*, terdiri dari risiko tingkat suku bunga yang diakibatkan oleh aktivitas perbankan (aset dan liabilitas) dan risiko nilai tukar. Risiko pasar *banking book* dikelola dengan tujuan agar laporan posisi keuangan Bank dapat bertahan pada perubahan suku bunga dan nilai tukar, sehingga dapat mencapai *Net Interest Income* (NII) yang dapat dikendalikan sesuai dengan toleransi risiko Bank.

(a) Risiko tingkat suku bunga

Instrumen keuangan yang berbasis suku bunga memiliki risiko karena terdapat potensi perubahan suku bunga yang akan membawa dampak kepada arus kas di masa depan.

Risiko tingkat suku bunga terutama terjadi karena adanya *gap* suku bunga (*repricing gap*) akibat perbedaan-perbedaan dalam skedul jatuh tempo atau waktu *repricing* antar aset, liabilitas dan komponen rekening administratif yang dimiliki oleh Bank.

36. RISK MANAGEMENT (continued)

Market Risk Management (continued)

In the market risk management of trading book, the Bank established the segregation of duties principle. There is a separation of functions among the parties who perform transactions, keep records of transactions, verification, policy makers unit, procedures and establishment of limits as well as the measurement of market risk, including calculation of CAR. The Bank calculates its market risk CAR using the standard model as a component of the calculation of CAR. If there is a gap on assets and liabilities for market risk and foreign exchanged risk within 3 months, Bank will mitigate it by using contingent stand by credit lines from BRI as Parent Company.

Market risk of banking book, consists of interest rate risk resulting from the Bank activities (assets and liabilities) and exchange rate risk. Market risk of banking book is managed with the aim that the statement of financial position of the Bank can survive during changes of interest rates and exchange rates, thus achieving Net Interest Income (NII) that can be managed in accordance with Bank's risk tolerance.

(a) Interest rate risk

Interest based financial instruments contain risks as there are potential changes in interest rate which impact the future cash flows.

Interest rate risk mainly occurs due to the repricing gap as a result of differences either in maturity or time schedule between the repricing of assets, liabilities and administrative accounts components which owned by the Bank.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

(a) Risiko tingkat suku bunga (lanjutan)

Tabel di bawah ini merupakan tingkat suku bunga rata-rata per tahun untuk posisi aset dan liabilitas keuangan Bank untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020:

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the Year Ended December 31,			
	2021		2020	
	Rupiah (%)	Mata uang asing/ Foreign currency (%)	Rupiah (%)	Mata uang asing/ Foreign currency (%)
Aset				
Giro pada bank lain	0,51	0,03	0,42	0,01
Penempatan pada Bank Indonesia dan bank lain	2,51	0,05	2,86	0,41
Efek-efek	6,36	0,78	6,44	4,21
Efek-efek yang dibeli dengan janji dijual kembali	3,52	-	4,30	-
Tagihan lainnya	-	-	8,50	-
Kredit yang diberikan	10,69	4,71	10,02	5,19
Liabilitas				
Simpanan nasabah				
Giro	3,12	0,94	2,45	0,77
Tabungan	3,91	-	4,65	-
Deposito berjangka	4,10	1,22	6,81	2,90
Simpanan dari bank lain				
Deposito berjangka	3,06	-	0,34	-
Giro	1,26	-	2,01	-
Inter-bank call money	-	0,20	-	0,77
Surat berharga yang diterbitkan	8,50	-	8,38	-
Pinjaman yang diterima	4,45	-	4,45	-

36. RISK MANAGEMENT (continued)

Market Risk Management (continued)

(a) Interest rate risk (continued)

The table below represents the annual average interest rates of assets and liabilities for the years ended December 31, 2021 and 2020:

Assets
Current accounts with other banks
Placement with Bank Indonesia and other banks
Securities
Securities purchased under agreement to resell
Other receivables
Loans
Liabilities
Deposits from customers
Demand deposits
Saving deposits
Time deposits
Deposits from other banks
Time deposits
Demand deposits
Inter-bank call money
Marketable securities issued
Fund borrowings

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

(a) Risiko tingkat suku bunga (lanjutan)

Tabel berikut ini mengikhtisarkan eksposur aset dan liabilitas terhadap risiko tingkat suku bunga (gross):

31 Desember/December 31, 2021						
Suku bunga mengambang/Floating interest rate						
	Tidak lebih dari 3 bulan/ Up to 3 months	Lebih dari 3 bulan tetapi tidak lebih dari 1 tahun/ More than 3 months up to 1 year	Lebih dari 1 tahun/ More than 1 year	Suku bunga tetap/ Fixed interest rate	Tidak dikenakan bunga/ Non-interest bearing	Total
Aset						
Kas	-	-	-	-	15.238.603	15.238.603
Giro pada Bank Indonesia	557.506.779	-	-	-	-	557.506.779
Giro pada bank lain	192.794.815	-	-	-	-	192.794.815
Penempatan pada Bank Indonesia dan bank lain	5.738	-	-	1.374.721.241	-	1.374.726.979
Efek-efek						
Nilai wajar melalui laba rugi	-	-	-	159.934.000	-	159.934.000
Nilai wajar melalui penghasilan komprehensif lain	-	-	-	-	-	-
Tersedia untuk dijual	-	-	-	2.320.510.098	-	2.320.510.098
Dimiliki hingga jatuh tempo	-	-	-	1.015.067.512	-	1.015.067.512
Biaya perolehan diamortisasi	-	-	-	-	-	-
Efek-efek yang dibeli dengan janji dijual kembali	-	-	-	650.377.813	-	650.377.813
Tagihan derivatif	-	-	-	-	-	-
Kredit yang diberikan						
Menengah	702.862.403	761.755.175	5.592.682.824	-	-	7.057.300.402
Ritel	344.581.158	819.742.559	2.429.000.356	-	-	3.593.324.073
Konsumer	19.169.494	40.840.569	897.692.860	-	-	957.702.923
Tagihan Akseptasi	-	-	-	-	92.561.485	92.561.485
Penyertaan saham	-	-	-	-	77.510	77.510
Aset lain-lain ^{*)}	-	-	-	-	75.007.277	75.007.277
Total	1.816.920.387	1.622.338.303	8.919.376.040	5.520.610.664	182.884.875	18.062.130.269
Liabilitas						
Liabilitas segera	-	-	-	-	9.926.302	9.926.302
Simpanan nasabah	-	-	-	-	-	-
Deposito berjangka	7.399.442.321	1.023.283.262	-	-	-	8.422.725.583
Giro	2.050.927.643	-	-	-	-	2.050.927.643
Tabungan	3.022.638.502	-	-	-	-	3.022.638.502
Simpanan dari bank lain	2.004.801	-	-	299.302.500	-	301.307.301
Tagihan Akseptasi	-	-	-	-	92.561.485	92.561.485
Surat berharga yang diterbitkan	-	-	-	238.862.928	-	238.862.928
Pinjaman yang diterima	-	-	-	16.517.311	-	16.517.311
Liabilitas lain-lain ^{**)}	-	-	-	2.841.087	20.896.205	23.737.292
Total	12.475.013.267	1.023.283.262	-	557.623.826	123.383.992	14.179.204.347
Perbedaan (gap) repricing suku bunga antara aset dan liabilitas keuangan	(10.658.092.880)	599.055.040	8.919.376.040	4.962.986.840	59.500.883	3.882.925.922

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain.
^{**)} Liabilitas lain-lain terdiri dari bunga yang masih harus dibayar, setoran jaminan dan liabilitas sewa.

36. RISK MANAGEMENT (continued)

Market Risk Management (continued)

(a) Interest rate risk (continued)

The tables below summarize the assets and liabilities exposures to interest rate risk (gross):

^{*)} Other assets consist of interest receivables and other receivables.
^{**)} Other liabilities consist of interest payable, guarantee deposits and lease liabilities.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

(a) Risiko tingkat suku bunga (lanjutan)

Tabel berikut ini mengikhtisarkan eksposur aset dan liabilitas terhadap risiko tingkat suku bunga (gross):

36. RISK MANAGEMENT (continued)

Market Risk Management (continued)

(a) Interest rate risk (continued)

The tables below summarize the assets and liabilities exposures to interest rate risk (gross):

31 Desember/December 31, 2020													
Suku bunga mengambang/Floating interest rate													
	Tidak lebih dari 3 bulan/ Up to 3 months	Lebih dari 3 bulan tetapi tidak lebih dari 1 tahun/ More than 3 months up to 1 year	Lebih dari 1 tahun/ More than 1 year	Suku bunga tetap/ Fixed interest rate	Tidak dikenakan bunga/ Non-interest bearing	Total							
Aset							Asset						
Kas	-	-	-	-	14.075.297	14.075.297	Cash						
Giro pada Bank Indonesia	756.177.533	-	-	-	-	756.177.533	Current accounts with Bank Indonesia						
Giro pada bank lain	332.095.870	-	-	-	-	332.095.870	Current accounts with other banks						
Penempatan pada Bank Indonesia dan bank lain	1.516.959.428	-	-	-	-	1.516.959.428	Placements with Bank Indonesia and other banks						
Efek-efek							Securities						
Nilai wajar melalui laba rugi	-	-	-	551.320.000	-	551.320.000	Fair value through profit or loss						
Nilai wajar melalui penghasilan komprehensif lain	-	-	-	2.197.950.643	-	2.197.950.643	Fair value through other comprehensive income						
Biaya perolehan diamortisasi	-	-	-	617.550.113	-	617.550.113	Amortized cost						
Efek-efek yang dibeli dengan janji dijual kembali	-	-	-	3.047.732.345	-	3.047.732.345	Securities purchased under agreement to resell						
Tagihan lainnya	-	-	-	23.745.047	-	23.745.047	Other receivables						
Kredit yang diberikan							Loans						
Menengah	1.089.228.097	2.474.201.557	9.941.888.494	-	-	13.505.318.148	Middle						
Ritel	334.317.460	1.067.506.315	3.426.499.291	-	-	4.828.323.066	Retail						
Konsumer	13.002.519	23.864.131	1.121.425.928	-	-	1.158.292.578	Consumer						
Penyertaan saham	-	-	-	-	297.658	297.658	Investment in shares of stocks						
Aset lain-lain ^{*)}	143.692	128.275	3.994.385	-	88.200.405	92.466.757	Other assets ^{*)}						
Total	4.041.924.599	3.565.700.278	14.493.808.098	6.438.298.148	102.573.360	28.642.304.483	Total						
Liabilitas							Liabilities						
Liabilitas segera	-	-	-	-	15.813.208	15.813.208	Liabilities due immediately						
Simpanan nasabah							Deposits from customers						
Deposito berjangka	14.264.118.011	3.245.758.349	-	-	-	17.509.876.360	Time deposits						
Giro	3.752.094.114	-	-	-	-	3.752.094.114	Demand deposits						
Tabungan	1.733.308.272	-	-	-	-	1.733.308.272	Saving deposits						
Simpanan dari bank lain	2.412.997	210.750.000	-	-	-	213.162.997	Deposits from other banks						
Surat berharga yang diterbitkan	-	-	-	238.615.701	-	238.615.701	Marketable securities issued						
Pinjaman yang diterima	-	-	-	17.318.944	-	17.318.944	Fund borrowings						
Liabilitas lain-lain ^{**)}	-	-	-	2.528.653	63.486.919	66.015.572	Other liabilities ^{**)}						
Total	19.751.933.394	3.456.508.349	-	258.463.298	79.300.127	23.546.205.168	Total						
Perbedaan (gap) repricing suku bunga antara aset dan liabilitas keuangan	(15.710.008.795)	109.191.929	14.493.808.098	6.179.834.850	23.273.233	5.096.099.315	Interest rate repricing gap between financial assets and liabilities						

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain
^{**)} Liabilitas lain-lain terdiri dari bunga yang masih harus dibayar, setoran jaminan dan liabilitas sewa.

^{*)} Other assets consist of interest receivables and other receivables
^{**)} Other liabilities consist of interest payable, guarantee deposits and lease liabilities.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

(a) Risiko tingkat suku bunga (lanjutan)

Tabel di bawah ini menunjukkan sensitivitas terhadap kemungkinan perubahan atas suku bunga terhadap laba rugi dan penghasilan komprehensif lain dengan asumsi bahwa semua variabel lain yang dimiliki adalah konstan untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020:

31 Desember/December 31, 2021		
Perubahan persentase/ Change Percentage	Dampak terhadap laba (rugi) dan penghasilan komprehensif lain sebelum pajak/ Impact to profit or (loss) and other incomprehensive income before tax	
Rupiah	+1% 86.321.378	
	-1% (86.321.378)	

Tingkat sensitivitas digunakan untuk menganalisis kemungkinan perubahan suku bunga yang berdampak pada keuntungan dan kerugian portofolio *banking book*. Pada analisa sensitivitas di atas, asumsi perubahan suku bunga untuk portofolio *banking book* dengan basis 1%.

(b) Risiko nilai tukar

Risiko nilai tukar merupakan risiko yang timbul karena adanya *gap* posisi valuta asing yang dimiliki Bank yang tercermin dalam Posisi Devisa Neto (PDN) baik secara individual maupun secara keseluruhan. Termasuk dalam posisi valuta asing tersebut yaitu posisi *trading book* yang dilakukan dengan tujuan untuk mendapatkan keuntungan transaksi valuta asing dalam jangka pendek maupun posisi *banking book* dalam rangka pengendalian PDN.

36. RISK MANAGEMENT (continued)

Market Risk Management (continued)

(a) Interest rate risk (continued)

The tables below present the sensitivity of the Bank's profit or loss and other comprehensive income to possible changes in interest rate, assuming all other variables are constant for the years ended December 31, 2021 and 2020:

31 Desember/December 31, 2020		
Perubahan persentase/ Change percentage	Dampak terhadap laba (rugi) dan penghasilan komprehensif lain sebelum pajak/ Impact to profit or (loss) and other incomprehensive income before tax	
Rupiah	+1% 131.339.899	
	-1% (131.339.899)	

Sensitivity level is used to analyze the possible changes in interest rate which impacted the gain or loss of banking book portfolios. The sensitivity analysis above assuming changes in interest rate for banking book portfolios at basis 1%.

(b) Exchange rate risk

Exchange rate risk is the risk due to the gap of foreign exchange positions held by the Bank which is reflected in the Net Open Position (NOP) either individually or as a whole. Included in the foreign exchange position is the position of the trading book which is done either to gain foreign exchange transaction income in the short-term period or banking book positions in order to control NOP.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

(b) Risiko nilai tukar

Menurut Peraturan Bank Indonesia (PBI) No. 17/5/PBI/2015 tanggal 29 Mei 2015 perubahan keempat atas PBI No. 5/13/PBI/2003 tentang Posisi Devisa Neto Bank Umum tanggal 17 Juli 2003, PDN ditetapkan maksimum sebesar 20% dari modal, sedangkan Bank secara internal menetapkan limit posisi devisa neto per valuta asing maksimum sebesar 10% dari modal.

PDN Bank pada tanggal-tanggal 31 Desember 2021 dan 2020 sebagai berikut:

31 Desember/December 31, 2021				
Mata uang	Aset/ Assets	Liabilitas/ Liabilities	Posisi devisa neto/ Net open position	Currencies
Laporan Posisi Keuangan dan Rekening Administratif¹⁾				Statement of Financial Position and Administrative Accounts¹⁾
Dólar Amerika Serikat	1.340.458.139	1.333.496.243	6.961.896	United States Dollar
Modal (Catatan 43)			2.158.071.045	Capital (Note 43)
Rasio PDN (keseluruhan)			0,32%	NOP ratio (overall)
31 Desember/December 31, 2020				
Mata uang	Aset/ Assets	Liabilitas/ Liabilities	Posisi devisa neto/ Net open position	Currencies
Laporan Posisi Keuangan dan Rekening Administratif¹⁾				Statement of Financial Position and Administrative Accounts¹⁾
Dólar Amerika Serikat	2.834.696.722	2.830.852.329	3.844.393	United States Dollar
Modal (Catatan 43)			4.305.030.498	Capital (Note 43)
Rasio PDN (keseluruhan)			0,09%	NOP ratio (overall)

¹⁾ Merupakan penjumlahan absolut dari selisih aset dan liabilitas.

¹⁾ Total absolute differences between assets and liabilities.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Pasar (lanjutan)

(b) Risiko nilai tukar (lanjutan)

Tabel di bawah ini menunjukkan sensitivitas terhadap kemungkinan perubahan atas nilai tukar terhadap laba rugi dan penghasilan komprehensif lain dengan asumsi bahwa semua variabel lain yang dimiliki adalah konstan untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020:

31 Desember/December 31, 2020		
Perubahan persentase/ Change Percentage	Dampak terhadap laba (rugi) dan penghasilan komprehensif lain sebelum pajak/ Impact to profit or (loss) and other comprehensive income before tax	
Dolar Amerika Serikat	+1% -1%	20.491 (20.491)

Manajemen Risiko Likuiditas

Pengelolaan risiko likuiditas Bank telah diatur dalam kebijakan penerapan manajemen risiko likuiditas. Kebijakan manajemen risiko likuiditas mencakup tata kelola likuiditas, penetapan strategi pendanaan, sistem peringatan dini, pengukuran dan penetapan limit risiko likuiditas termasuk pengelolaan aset likuid berkualitas tinggi (HQLA) dan rencana pendanaan darurat likuiditas. Kebijakan ini disusun untuk menjaga kecukupan dana harian dalam memenuhi kewajiban secara terukur dari berbagai sumber dana yang tersedia termasuk memastikan ketersediaan aset likuid berkualitas tinggi yang cukup.

Pengendalian eksposur dan konsentrasi likuiditas, dibahas pada rapat *Asset and Liability Committee* (ALCO) dan rapat *Risk Management Committee* (RMC). Hal-hal yang dimonitor diantaranya terkait realisasi, limit risiko konsentrasi 25 depasan inti, konsentrasi depasan besar, *Primary Reserve*, *Secondary Reserve*, LDR, PDN dan lainnya. Potensi risiko likuiditas di masa depan diukur melalui *liquidity gap analysis* dan *repricing gap* yang menggambarkan kondisi proyeksi lebih dan kurang arus kas berdasarkan jatuh tempo komponen kas dari sisi aset dan sisi liabilitas, setelah memperhitungkan kebutuhan untuk ekspansi bisnis. Analisa ini bermanfaat dalam perencanaan likuiditas yang lebih efisien dan pengelolaan arus kas, termasuk kebutuhan ekspansi bisnis.

36. RISK MANAGEMENT (continued)

Market Risk Management (continued)

(b) Exchange rate risk (continued)

The tables below demonstrated the sensitivity of the Bank's profit or loss and other comprehensive income to reasonably possible changes in exchange rate, assuming all other variables are constant for the year ended December 31, 2021 and 2020:

31 Desember/December 31, 2020			
Perubahan persentase/ Change percentage	Dampak terhadap laba (rugi) dan penghasilan komprehensif lain sebelum pajak/ Impact to profit or (loss) and other comprehensive income before tax		
	+1% -1%	154.304 (154.304)	United States Dollar

Liquidity Risk Management

The management of the Bank's liquidity risk has been regulated in the liquidity risk management implementation policy. Liquidity risk management policies cover liquidity governance, determination of funding strategies, early warning systems, measurement and determination of liquidity risk limits, including management of high quality liquid assets (HQLA) and liquidity emergency funding plans. This policy was formulated to maintain daily fund adequacy in fulfilling obligations in a measured manner from various available sources of funds, including ensuring the availability of sufficient high-quality liquid assets.

Exposure control and liquidity concentration are discussed at the *Asset and Liability Committee* (ALCO) meeting and the *Risk Management Committee* (RMC) meeting. Matters that are monitored include realization, risk limits for the concentration of 25 core depositors, concentration of large depositors, *Primary Reserve*, *Secondary Reserve*, LDR, PDN and others. Potential future liquidity risk is measured through liquidity gap analysis and repricing gap, which illustrates the projected condition of over and under cash flow based on the maturity of cash components from the asset and liability side, after taking into account the need for business expansion. This analysis is useful in planning a more efficient liquidity and cash flow management, including business expansion needs.

The original financial statements included herein are in the Indonesian language.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Likuiditas (lanjutan)

Berikut adalah tabel mengenai pemetaan aset dan liabilitas keuangan dalam skala waktu tertentu (maturity bucket) berdasarkan sisa jangka waktu sampai dengan jatuh tempo (remaining maturity) pada tanggal-tanggal 31 Desember 2021 dan 2020:

36. RISK MANAGEMENT (continued)

Liquidity Risk Management (continued)

Table of financial assets and liabilities mapping in the scale of time (maturity bucket) based on the remaining maturity as of December 31, 2021 and 2020:

31 Desember/December 31, 2021							
	Sampai dengan 1 bulan/ Up to 1 month	Lebih dari 1 bulan sampai dengan 3 bulan/ More than 1 month up to 3 months	Lebih dari 3 bulan sampai dengan 1 tahun/ More than 3 months up to 1 year	Lebih dari 1 tahun/ More than 1 year	Lainnya yang tidak memiliki jatuh tempo/ Others without maturity	Total	
Aset							Assets
Kas	15.238.603	-	-	-	-	15.238.603	Cash
Giro pada Bank Indonesia	557.506.779	-	-	-	-	557.506.779	Current accounts with Bank Indonesia
Giro pada bank lain	192.794.815	-	-	-	-	192.794.815	Current accounts with other banks
Cadangan kerugian penurunan nilai	-	-	-	-	(137.437)	(137.437)	Allowance for impairment losses
Penempatan pada Bank Indonesia dan bank lain	1.374.726.979	-	-	-	-	1.374.726.979	Placements with Bank Indonesia and other banks
Cadangan kerugian penurunan nilai	-	-	-	-	-	-	Allowance for impairment losses
Efek-efek							Securities
Nilai wajar melalui laba rugi	159.934.000	-	-	-	-	159.934.000	Fair value through profit or loss
Nilai wajar melalui penghasilan komprehensif lain	-	-	2.320.510.098	-	-	2.320.510.098	Fair value through other comprehensive income
Biaya perolehan diamortisasi	-	50.000.000	342.171.980	622.895.532	-	1.015.067.512	Amortized cost
Cadangan kerugian penurunan nilai	-	-	-	-	(3.654.228)	(3.654.228)	Impairment losses
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	-	-	-	-	650.377.813	Securities purchased under agreement to resell
Tagihan lainnya							Other receivables
Cadangan kerugian penurunan nilai	-	-	-	-	-	-	Allowance for impairment losses
Tagihan derivatif							Derivative receivables
Kredit yang diberikan							Loans
Menengah	133.152.843	569.709.560	761.755.175	5.592.682.824	-	7.057.300.402	Middle
Ritel	124.163.258	220.417.900	819.742.559	2.429.000.356	-	3.593.324.073	Retail
Konsumer	2.162.589	17.006.905	40.840.569	897.692.860	-	957.702.923	Consumer
Cadangan kerugian penurunan nilai	-	-	-	-	(1.875.401.843)	(1.875.401.843)	Allowance for impairment losses
Tagihan Akseptasi	30.342.254	37.039.244	25.179.987	-	-	92.561.485	Acceptance
Cadangan kerugian penurunan nilai	-	-	-	-	(112.202)	(112.202)	Allowance for impairment losses
Penyertaan saham	-	-	-	-	77.510	77.510	Investment in shares of stocks
Aset lain-lain ^{*)}	25.067.095	-	-	49.940.182	-	75.007.277	Other assets ^{*)}
Total	3.265.467.028	894.173.609	4.310.200.368	9.592.211.754	(1.879.228.200)	16.182.824.559	Total
Liabilitas							Liabilities
Liabilitas segera	-	9.926.302	-	-	-	9.926.302	Liabilities due immediately
Simpanan nasabah							Deposits from customers
Deposito berjangka	4.499.823.714	2.899.618.607	1.023.283.262	-	-	8.422.725.583	Time deposits
Giro	2.050.927.643	-	-	-	-	2.050.927.643	Demand deposits
Tabungan	3.022.638.502	-	-	-	-	3.022.638.502	Saving deposits
Simpanan dari bank lain	228.044.801	73.262.500	-	-	-	301.307.301	Deposits from other banks
Liabilitas derivatif	-	-	-	-	-	-	Derivative liabilities
Liabilitas Akseptasi	30.342.254	37.039.244	25.179.987	-	-	92.561.485	Acceptance liabilities
Surat berharga yang diterbitkan	-	-	238.862.928	-	-	238.862.928	Marketable securities issued
Pinjaman yang diterima	-	-	-	16.517.311	-	16.517.311	Fund borrowings
Liabilitas lain-lain ^{**)}	4.683.736	49.550	16.162.919	2.841.087	-	23.737.292	Other liabilities ^{**)}
Total	9.836.460.650	3.019.896.203	1.303.489.096	19.358.398	-	14.179.204.347	Total
Perbedaan jatuh tempo	(6.570.993.622)	(2.125.722.595)	3.006.711.273	9.572.853.356	(1.879.228.200)	2.003.620.212	Maturity gap

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain
^{**)} Liabilitas lain-lain terdiri dari bunga yang masih harus dibayar,
setoran jaminan dan liabilitas sewa.

^{*)} Other assets consist of interest receivables and other receivables
^{**)} Other liabilities consist of interest payable, guarantee deposits
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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Likuiditas (lanjutan)

Berikut adalah tabel mengenai pemetaan aset dan liabilitas keuangan dalam skala waktu tertentu (maturity bucket) berdasarkan sisa jangka waktu sampai dengan jatuh tempo (remaining maturity) pada tanggal-tanggal 31 Desember 2021 dan 2020 (lanjutan):

36. RISK MANAGEMENT (continued)

Liquidity Risk Management (continued)

Table of financial assets and liabilities mapping in the scale of time (maturity bucket) based on the remaining maturity as of December 31, 2021 and 2020 (continued):

31 Desember/December 31, 2020							
	Sampai dengan 1 bulan/ Up to 1 month	Lebih dari 1 bulan sampai dengan 3 bulan/ More than 1 month up to 3 months	Lebih dari 3 bulan sampai dengan 1 tahun/ More than 3 months up to 1 year	Lebih dari 1 tahun/ More than 1 year	Lainnya yang tidak memiliki jatuh tempo/ Others without maturity	Total	
Aset							Assets
Kas	14.075.297	-	-	-	-	14.075.297	Cash
Giro pada Bank Indonesia	756.177.533	-	-	-	-	756.177.533	Current accounts with Bank Indonesia
Giro pada bank lain	332.095.870	-	-	-	-	332.095.870	Current accounts with other banks
Cadangan kerugian penurunan nilai	-	-	-	-	(380.595)	(380.595)	Allowance for impairment losses
Penempatan pada Bank Indonesia dan bank lain	1.516.959.428	-	-	-	-	1.516.959.428	Placements with Bank Indonesia and other banks
Cadangan kerugian penurunan nilai	-	-	-	-	(621.602)	(621.602)	Allowance for impairment losses
Efek-efek							Securities
Nilai wajar melalui laba rugi	551.320.000	-	-	-	-	551.320.000	Fair value through profit or loss
Nilai wajar melalui penghasilan komprehensif lain	-	-	2.197.950.643	-	-	2.197.950.643	Fair value through other comprehensive income
Biaya perolehan diamortisasi	-	-	134.030.452	483.519.661	-	617.550.113	Amortized cost
Cadangan kerugian penurunan nilai	-	-	-	-	(6.079.579)	(6.079.579)	Allowance for impairment losses
Efek-efek yang dibeli dengan janji dijual kembali	3.047.732.345	-	-	-	-	3.047.732.345	Securities purchased under agreement to resell
Tagihan lainnya	3.899.623	19.845.424	-	-	-	23.745.047	Other receivables
Cadangan kerugian penurunan nilai	-	-	-	-	(37.118)	(37.118)	Allowance for impairment losses
Tagihan derivatif	-	-	-	-	-	-	Derivative receivables
Kredit yang diberikan							Loans
Menengah	136.136.602	953.091.495	2.474.201.557	9.941.888.494	-	13.505.318.148	Middle
Ritel	136.959.022	197.358.438	1.067.506.315	3.426.499.291	-	4.828.323.066	Retail
Konsumer	9.179.299	3.823.220	23.864.131	1.121.425.928	-	1.158.292.578	Consumer
Cadangan kerugian penurunan nilai	-	-	-	-	(1.006.365.249)	(1.006.365.249)	Allowance for impairment losses
Penyertaan saham	-	-	-	-	297.658	297.658	Investment in shares of stocks
Aset lain-lain ^{*)}	23.199.405	6.860	128.276	69.132.216	-	92.466.757	Other assets ^{*)}
Total	6.527.734.424	1.174.125.437	5.897.681.374	15.042.465.590	(1.013.186.485)	27.628.820.340	Total
Liabilitas							Liabilities
Liabilitas segera	-	15.813.208	-	-	-	15.813.208	Liabilities due immediately
Simpanan nasabah							Deposits from customers
Deposito berjangka	9.455.764.626	4.808.353.385	3.245.758.349	-	-	17.509.876.360	Time deposits
Giro	3.752.094.114	-	-	-	-	3.752.094.114	Demand deposits
Tabungan	1.733.308.272	-	-	-	-	1.733.308.272	Saving deposits
Simpanan dari bank lain	2.412.997	210.750.000	-	-	-	213.162.997	Deposits from other banks
Liabilitas derivatif	-	-	-	-	-	-	Derivative payables
Surat berharga yang diterbitkan	-	-	-	238.615.701	-	238.615.701	Marketable securities issued
Pinjaman yang diterima	-	-	-	17.318.944	-	17.318.944	Fund borrowings
Liabilitas lain-lain ^{**)}	4.683.736	49.250	58.753.933	2.528.653	-	56.015.572	Other liabilities ^{**)}
Total	14.948.263.745	5.034.965.843	3.304.512.282	258.463.298	-	23.543.676.515	Total
Perbedaan jatuh tempo	(8.420.529.321)	(3.860.840.406)	2.593.169.092	14.784.002.292	(1.013.186.485)	4.082.615.172	Maturity gap

^{*)} Aset lain-lain terdiri atas piutang bunga dan piutang lain-lain
^{**)} Liabilitas lain-lain terdiri dari bunga yang masih harus dibayar,
setoran jaminan dan liabilitas sewa.

^{*)} Other assets consist of interest receivables and other receivables
^{**)} Other liabilities consist of interest payable, guarantee deposits
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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Operasional

Penerapan manajemen risiko operasional dilakukan melalui penyusunan pedoman prosedur operasional (BPO) bekerja untuk memastikan kejelasan tahapan aktivitas operasional dan bisnis dan meminimalkan kejadian lalai ataupun *fraud*. Pengendalian risiko operasional juga dilakukan dengan menetapkan limit risiko operasional yang terukur untuk memastikan kegiatan perbankan dilaksanakan secara penuh kehati-hatian (*prudently*).

Pengukuran kecukupan modal untuk meng-cover risiko operasional menggunakan pendekatan metode indikator dasar dimana pada pelaporan 31 Desember 2021 kepada Regulator adalah sebesar Rp110,04 Miliar (5,22% dari total Modal) (tidak diaudit).

Untuk meningkatkan pemahaman manajemen risiko secara menyeluruh maka dilakukan pelatihan berkala manajemen risiko untuk Pekerja dan pelaksanaan kewajiban Sertifikasi Manajemen Risiko bagi Pejabat yang diwajibkan bersertifikat.

Satuan Kerja Manajemen Risiko (SKMR) sebagai *second line of defense* bertanggung jawab dalam melakukan penyusunan kebijakan dan metodologi, melakukan pengukuran, kaji ulang dan pemantauan manajemen risiko pada tingkat perusahaan. SKMR melakukan pemantauan dan penilaian profil risiko Bank dan mengkaji dampak risiko suatu produk dan aktivitas baru serta memberikan rekomendasi atas usulan mitigasi risiko.

Manajemen risiko adalah kegiatan yang menjadi tanggung jawab setiap Pekerja Bank, baik pada tingkat *first level*, *second level* dan *third level of defense*. Setiap satuan kerja operasional sebagai pemegang risiko berkewajiban untuk aktif dalam identifikasi, pengukuran, pemantauan dan pengendalian risiko baik di tingkat transaksi maupun keseluruhan rangkaian aktivitas di unit kerjanya.

Manajemen Risiko Kepatuhan

Pengelolaan dan pengendalian risiko kepatuhan dilakukan dengan memastikan pelaksanaan patuh terhadap peraturan regulator, peraturan perundang-undangan dan ketentuan kewajiban lainnya.

36. RISK MANAGEMENT (continued)

Operational Risk Management

The implementation of operational risk management is carried out through the preparation of operational procedure guidelines (BPO) to ensure clarity of the stages of operational and business activities and minimize the incidence of negligence or fraud. Operational risk control is also carried out by setting measurable operational risk limits to ensure banking activities are carried out prudently (prudently).

Measurement of capital adequacy to cover operational risk using the basic indicator method approach, where as of December 31, 2021 reporting to regulators was Rp110.04 billion (5.22% of total capital) (unaudited).

To improve the overall understanding of risk management, periodic risk management training is conducted for Employees and implementation of Risk Management Certification obligations for Officials who are required to be certified.

The Risk Management Work Unit (SKMR) as the second line of defense is responsible in formulating policies and methodologies, measuring, reviewing and monitoring risk management at the company level. SKMR monitors and assesses the risk profile of the Bank and reviews the risk impact of new products and activities and provides recommendations on risk mitigation proposals.

Risk management is an activity that is the responsibility of every Bank employee, both at the first level, second level and third level of defense. Each operational work unit as a risk holder is obliged to be active in the identification, measurement, monitoring and control of risk both at the transaction level and in the entire series of activities in the work unit.

Compliance Risk Management

Compliance risk management and control is carried out by ensuring that implementation is in compliance with regulatory regulations, laws and regulations and other provisions of obligations.

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36. MANAJEMEN RISIKO (lanjutan)

Manajemen Risiko Strategis

Pengelolaan dan pengendalian risiko strategis dilakukan dengan cara melaksanakan proses pengendalian terhadap rencana strategis dan rencana bisnis. Hal ini bertujuan untuk memantau realisasi dibandingkan dengan target yang akan dicapai dan memastikan bahwa risiko yang diambil masih dalam batas toleransi.

Manajemen Risiko Hukum

Pengelolaan dan pengendalian risiko hukum dilakukan melalui:

- (a) Peninjauan secara berkala terhadap kontrak dan perjanjian antara Bank dan pihak lain.
- (b) Pengembangan budaya kepatuhan dan kepedulian terhadap risiko hukum kepada seluruh pegawai pada setiap jenjang organisasi secara berkelanjutan.

Manajemen Risiko Reputasi

Risiko reputasi dimitigasi dengan keterbukaan informasi, publikasi positif kegiatan Bank dan kecepatan menjawab permasalahan yang berasal dari keluhan Nasabah baik melalui sarana resmi komunikasi Bank maupun media massa.

Kebijakan Manajemen Risiko

Penyempurnaan kebijakan dan pedoman penerapan manajemen risiko untuk segmen bisnis dilaksanakan secara berkelanjutan untuk mengakomodasi perubahan eksposur risiko karena kondisi eksternal dan internal serta perubahan regulasi.

Identifikasi risiko Nasabah dilakukan dengan menentukan karakteristik risiko yang melekat untuk setiap Nasabah dengan parameter risiko seperti identitas Nasabah, lokasi usaha, profil Nasabah, kegiatan usaha, struktur kepemilikan bagi Nasabah perusahaan, jumlah dan frekuensi transaksi, dan informasi lainnya yang dapat digunakan untuk mengukur tingkat risiko Nasabah. Hasil identifikasi dan pengukuran tersebut akan menghasilkan profil risiko Nasabah yang wajib dilakukan tindak lanjut pemantauan dan pengendalian terhadap masing-masing profil risiko tersebut.

36. RISK MANAGEMENT (continued)

Strategic Risk Management

Management and control of strategic risk is done by implementing the strategic and business plan control process. The purpose of this process is to monitor the realization compared to the target to be achieved and ensures that the risks taken are within the limits of tolerance.

Legal Risk Management

Legal risk management and control is conducted through:

- (a) Periodic review of contracts and agreements between the Bank and another party.
- (b) Development of compliance and concern culture on legal risks to all employees at every level of the organization on an ongoing basis.

Reputational Risk Management

Reputational risk is mitigated through transparency or information disclosure, publication of the Bank's activity and the speed to address complaints from Customers directed from the Bank's official communication channel and mass media.

Risk Management Policy

Risk management policy and guidance improvement for business segments are reviewed continuously to accommodate changes in risk exposure due to external and internal condition and regulation change.

Customer's risk identification process is conducted by determining inherent risk characteristic of the Customer with parameters such as customer personal identity, business location, customer profile, business type, ownership structure for corporate Customers, amount and frequency of transaction, and other informations which can be used to measure the Customer risk level. It will result a Customer risk profile which should be follow up by monitoring and controlling against each risk profile.

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36. MANAJEMEN RISIKO (lanjutan)

Dampak Penyebaran Covid-19

Pandemi Covid-19 berdampak signifikan terhadap penurunan perekonomian nasional maupun global. Berbagai upaya telah dilakukan pemerintah untuk meningkatkan pertumbuhan ekonomi agar Indonesia terhindar dari resesi ekonomi. Sejak awal tahun 2021, pemerintah Indonesia menerapkan program Pemulihan Ekonomi Indonesia (PEN) yang diharapkan mampu menggerakkan pertumbuhan ekonomi Indonesia secara menyeluruh menuju zona positif. Oleh karena itu, pemerintah mendorong pengembangan usaha mikro, kecil, dan menengah sebagai motor ekonomi rakyat yang dapat mendorong pertumbuhan ekonomi dan pemulihan ekonomi nasional.

Pada tahun 2021, makroekonomi global dan nasional masih dihadapkan pada krisis kesehatan akibat pandemi *Coronavirus Disease* (Covid-19) yang memberikan tekanan yang luar biasa kepada kondisi perekonomian global dan nasional. Kondisi tersebut mengalami ketidakpastian dari berbagai sektor terutama pada kondisi pasar keuangan global yang tinggi hingga semester I 2021.

Pada Otoritas Jasa Keuangan, Bank Indonesia, dan otoritas terkait lainnya berupaya untuk segera mengambil langkah untuk memitigasi pengaruh risiko pandemi terhadap kondisi perekonomian. Berdasarkan data dari Badan Pusat Statistik (BPS) inflasi Indeks Harga Konsumen (IHK) pada akhir tahun 2021 tercatat sebesar 1,87% (yoy) meningkat dibandingkan tahun 2020 sebesar 1,68% (yoy). Sementara itu Tingkat suku bunga BI 7-Day Reverse Repo Rate (BI7DRR) masih dipertahankan sebesar 3,50%, suku bunga *Deposit Facility* sebesar 2,75%, dan suku bunga *Lending Facility* sebesar 4,25%. Keputusan ini sejalan dengan perlunya menjaga stabilitas nilai tukar dan sistem keuangan, di tengah prakiraan inflasi yang rendah dan upaya untuk mendukung pertumbuhan ekonomi. Bank Indonesia memprakirakan ekonomi dunia tumbuh sesuai proyeksi sekitar 5,7% pada 2021 dan 4,4% pada 2022. Ketidakpastian pasar keuangan global masih akan terjadi di tengah penyebaran Covid-19.

36. RISK MANAGEMENT (continued)

The Impact of The Spread of Covid-19

The Covid-19 pandemic has had a significant impact on the decline in the national and global economy. Various efforts have been made by the government to increase economic growth so that Indonesia avoids an economic recession. Since early 2021, the Indonesian government has implemented the Indonesian Economic Recovery (PEN) program which is expected to be able to move Indonesia's economic growth as a whole towards the positive zone. Therefore, the government encourages the development of micro, small and medium enterprises as the people's economic motor that can boost economic growth and national economic recovery.

In 2021, global and national macroeconomics still faced with a health crisis due to the *Coronavirus Disease* (Covid-19) pandemic which has put tremendous pressure on global and national economic conditions. This condition experienced uncertainty from various sectors, especially during the high global financial market conditions until the first semester of 2021.

The Financial Services Authority, Bank Indonesia and other related parties are trying to take immediate action to mitigate the impact of pandemic risk on economic conditions. Based on data from the Central Statistics Agency (BPS), the Consumer Price Index (CPI) inflation at the end of 2021 was recorded at 1.87% (yoy), an increase compared to 2020 at 1.68% (yoy). Meanwhile, the BI 7-Day Reverse Repo Rate (BI7DRR) was maintained at 3.50%, the Deposit Facility interest rate at 2.75%, and the Lending Facility interest rate at 4.25%. This decision is in line with the need to maintain the exchange rate and financial system, amid low inflation forecasts and efforts to support economic growth. Bank Indonesia predicts that the world economy will grow according to the forecast of around 5.7% in 2021 and 4.4% in 2022. Uncertainty in global financial markets will continue amid the spread of Covid-19.

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36. MANAJEMEN RISIKO (lanjutan)

Dampak Penyebaran Covid-19 (lanjutan)

Lebih lanjut, tingkat risiko di Bank dipengaruhi oleh Pandemi Covid-19 secara tidak signifikan. Hal ini terlihat dari hasil penilaian Tingkat Kesehatan Bank (TKB) Bank posisi 31 Desember 2021 yang berada pada Peringkat 2 (sehat) dengan tren membaik dibandingkan dengan TKB Bank posisi Desember 2020. Dampak Pandemi Covid-19 terhadap parameter TKB Bank posisi Desember 2021 sebagai berikut:

1. Profil Risiko

Hasil penilaian Profil Risiko Bank secara *self assessment* periode 31 Desember 2021 di Peringkat 2 (*Low to Moderate*) dengan tren membaik dibandingkan periode 31 Desember 2020. Risiko yang terdampak pandemi Covid-19 adalah aktivitas perkreditan dan pencapaian angka strategik. Aktivitas perkreditan yang terdampak pandemi Covid-19 telah dilakukan tindak lanjut penanganan berupa analisa prospek dan sisa kemampuan membayar kemudian dilakukan restrukturisasi fasilitas kredit. Terdapat perbaikan risiko berupa kualitas kredit pada Desember 2021 menjadi 1,59% untuk kredit bermasalah (neto) dan kenaikan CKPN coverage terhadap *Non-Performing Loan* dari 103,96% pada Desember 2020 menjadi 417,86% pada Desember 2021. Perbaikan risiko strategik terjadi dikarenakan Bank Raya telah berhasil menurunkan *outstanding* kredit menengah untuk menyesuaikan dengan strategi bisnis yang bertransformasi ke bisnis digital. Pencapaian target produk digital yaitu Pinang dan realisasi program kerja *strategic initiatives* telah berjalan sesuai RBB dan rutin dipresentasikan secara mingguan kepada Direksi. Selain itu, perbaikan risiko Reputasi terjadi karena disebabkan beberapa hal, diantaranya tidak ada pemberitaan negatif terkait Bank Raya, mengadakan Webinar Raya Academy setiap bulan dengan mengundang pembicara *Leaders Fintech* untuk sharing pengetahuan sekaligus memperkenalkan Bank Raya kepada masyarakat umum, selain itu secara aktif melakukan *Campaign* dengan *followers* Bank Raya yang dikomunikasikan melalui media Instagram, Twitter, Facebook, LinkedIn, serta Youtube.

36. RISK MANAGEMENT (continued)

The Impact of The Spread of Covid-19 (continued)

Furthermore, the Risk Level at the Bank is not significantly affected by the Covid-19 Pandemic. This can be seen from the results of the Bank's Bank Soundness Level (TKB) assessment for the position of December 31, 2021 which is in Rank 2 (healthy) with an improving trend compared to the Bank's TKB for the position in December 2020. The impact of the Covid-19 pandemic on the parameters of the Bank's TKB for the position in December 2021 as follows:

1. Risk Profile

The results of the assessment of the Bank's Risk Profile by self-assessment for the period 31 December 2021 were ranked 2 (*Low to Moderate*) with an improving trend compared to the 31 December 2020 period. Some of the risks affected by the Covid-19 pandemic are credit activities and the achievement of strategic figures. Credit activities affected by the Covid-19 pandemic have carried out follow-up handling in the form of prospect analysis and remaining ability to pay, then restructuring of credit facilities has been carried out. There is an improvement in credit quality in the form of credit quality in December 2021 to 1.59% for non-performing loans (net) and an increase in CKPN coverage for Non-Performing Loans from 103.96% in December 2020 to 417.86% in December 2021. Strategic risk improvement occurs This is because Bank Raya has succeeded in reducing the outstanding medium credit to adjust to a business strategy that is transforming into a digital business. The achievement of the digital product target, namely Pinang and the realization of strategic initiatives work programs have been running according to the RBB and are routinely presented weekly to the Board of Directors. In addition, the improvement in Reputation risk occurred due to several reasons, including the absence of negative news regarding Bank Raya, holding a monthly Raya Academy Webinar by inviting Leaders Fintech speakers to share knowledge as well as introducing Bank Raya to the general public, in addition to actively conducting campaigns with Bank Raya followers communicated through Instagram, Twitter, Facebook, LinkedIn, and Youtube.

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36. MANAJEMEN RISIKO (lanjutan)

Dampak Penyebaran Covid-19 (lanjutan)

Lebih lanjut, tingkat risiko di Bank dipengaruhi oleh Pandemi Covid-19 secara tidak signifikan. Hal ini terlihat dari hasil penilaian Tingkat Kesehatan Bank (TKB) Bank posisi 31 Desember 2021 yang berada pada Peringkat 2 (sehat) dengan tren membaik dibandingkan dengan TKB Bank posisi Desember 2019. Dampak Pandemi Covid-19 terhadap parameter TKB Bank posisi Desember 2021 sebagai berikut (lanjutan):

2. Rentabilitas

Hasil pencapaian rentabilitas untuk tahun yang berakhir pada tanggal 31 Desember 2021 adalah peringkat 3 (Cukup Memadai) yang tercermin pada pencapaian laba/rugi bersih Bank. Pencapaian rugi dibukukan sampai dengan Desember 2021 dikarenakan pembentukan biaya CKPN untuk memitigasi risiko kredit menengah mengingat strategi bisnis Bank Raya yang bertransformasi memindahkan fokus bisnisnya ke bisnis digital.

3. Permodalan

Penerapan PSAK 71 menyebabkan Bank melakukan lebih banyak pencadangan biaya aset produktif. Permodalan Bank Raya sampai dengan Desember 2021 berada pada peringkat 2 (memadai) dengan kecukupan *Capital Adequacy Ratio* (CAR) untuk mengantisipasi potensi kerugian sesuai profil risiko mencapai 19,61%. Angka ini jauh melampaui batas persyaratan minimum CAR sesuai regulasi Otoritas Jasa Keuangan (OJK) yaitu CAR 10,00% sesuai *internal capital adequacy assessment process* (ICAAP). Dewan Komisaris dan Direksi turut berperan aktif dalam memantau kecukupan modal Bank..

4. Tata Kelola

Pandemi Covid-19 tidak mempengaruhi tata kelola Bank pada posisi Desember 2021 dibandingkan dengan posisi Desember 2020 yang relatif stabil.

36. RISK MANAGEMENT (continued)

The Impact of The Spread of Covid-19 (continued)

Furthermore, the Risk Level at the Bank is not significantly affected by the Covid-19 Pandemic. This can be seen from the results of the Bank's Bank Soundness Level (TKB) assessment for the position of December 31, 2021 which is in Rank 2 (healthy) with an improving trend compared to the Bank's TKB for the position in December 2020. The impact of the Covid-19 pandemic on the parameters of the Bank's TKB for the position in December 2021 as follows (continued):

2. Rentability

The result of achieving profitability for the year ending December 31, 2021 is rank 3 (Quite Adequate) which is reflected in the achievement of the Bank's net profit/loss. The loss achievement was recorded until December 2021 due to the formation of CKPN fees to mitigate medium credit risk considering that Bank Raya's business strategy was transforming to shift its business focus to digital business.

3. Capital

The adoption of PSAK 71 causes the Bank to make more reserves for the cost of earning assets. Bank Raya's capital as of December 2021 is ranked 2 (adequate) with a sufficient Capital Adequacy Ratio (CAR) to anticipate potential losses according to the risk profile reaching 19.61%. This figure far exceeds the minimum CAR requirement according to the Financial Services Authority (OJK) regulation, which is a CAR of 10.00% according to the internal capital adequacy assessment process (ICAAP). The Board of Commissioners and the Board of Directors take an active role in monitoring the Bank's capital adequacy.

4. Governance

The Covid-19 pandemic did not affect the Bank governance in the position of June 2021 compared to the position of December 2020 which was relatively stable.

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37. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari semua aset dan liabilitas keuangan. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal-tanggal 31 Desember 2021 dan 2020 dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal tersebut.

	31 Desember/December 31, 2021		31 Desember/December 31, 2020	
	Nilai tercatat/ Carrying amount	Nilai wajar/ Fair value	Nilai tercatat/ Carrying amount	Nilai wajar/ Fair value
Aset				
Kas	15.238.603	15.238.603	14.075.297	14.075.297
Giro pada Bank Indonesia	557.506.779	557.506.779	756.177.533	756.177.533
Giro pada bank lain	192.657.378	192.657.378	331.715.275	331.715.275
Penempatan pada Bank Indonesia dan bank lain	1.374.726.979	1.374.726.979	1.516.337.826	1.516.337.826
Efek-efek				
Nilai wajar melalui laba rugi	159.934.000	159.934.000	551.320.000	551.320.000
Nilai wajar melalui penghasilan komprehensif lain	2.320.510.098	2.320.510.098	2.197.950.643	2.197.950.643
Biaya perolehan diamortisasi	1.015.067.512	1.033.527.500	617.550.113	619.978.421
Efek-efek yang dibeli dengan janji dijual kembali	650.377.813	650.377.813	3.047.732.345	3.047.732.345
Tagihan lainnya	-	-	23.707.929	23.707.929
Kredit yang diberikan	9.732.925.555	9.364.391.577	18.485.568.543	17.785.618.660
Tagihan Akseptasi	92.449.283	92.449.283	-	-
Penyertaan saham ^{*)}	77.510	77.510	297.658	297.658
Aset lain-lain ^{**)}	75.007.277	75.007.277	92.466.757	92.466.757
Total	16.186.478.787	15.836.404.797	27.634.899.919	26.937.378.344
Liabilitas				
Liabilitas segera	9.926.302	9.926.302	15.813.208	15.813.208
Simpanan nasabah				
Giro	2.050.927.643	2.050.927.643	3.752.094.114	3.752.094.114
Tabungan	3.022.638.502	3.022.638.502	1.733.308.272	1.733.308.272
Deposito berjangka	8.422.725.583	8.422.725.583	17.509.876.360	17.509.876.360
Simpanan dari bank lain	301.307.301	301.307.301	213.162.997	213.162.997
Liabilitas akseptasi	92.561.485	92.561.485	-	-
Surat berharga yang diterbitkan	238.862.928	244.795.750	238.615.701	247.711.550
Pinjaman yang diterima	16.517.311	16.517.311	17.318.944	17.318.944
Liabilitas lain-lain ^{***)}	23.737.292	23.737.292	68.544.225	68.544.225
Total	14.179.204.347	14.185.137.169	23.548.733.821	23.557.829.670

^{*)} Penyertaan saham yang tidak memiliki pengaruh signifikan.
^{**)} Aset lain-lain terdiri dari piutang bunga dan piutang lain-lain.
^{***)} Liabilitas lain-lain terdiri dari bunga yang masih harus dibayar, setoran jaminan dan liabilitas sewa.

37. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

The table below presents the comparison between the carrying values and fair values of all financial assets and liabilities. The fair values disclosed are based on relevant information available as of December 31, 2021 and 2020 and are not updated to reflect changes in market conditions which have occurred after these dates.

Assets
Cash
Current accounts with Bank Indonesia
Current accounts with other banks
Placements with Bank Indonesia and other banks
Securities
Fair value through profit or loss
Fair value through other comprehensive income
Amortized cost
Securities purchased under agreement to resell
Other receivables
Loans
Acceptance
Investment in shares of stocks ^{*)}
Other assets ^{**)}
Total
Liabilities
Liabilities due immediately
Deposits from customer
Demand deposits
Saving deposits
Time deposits
Deposits from other banks
Acceptances payables
Marketable securities issued
Fund borrowings
Other liabilities ^{***)}
Total

^{*)} Investment in shares of stocks with no significant influence.
^{**)} Other assets consist of interest receivables and other receivables.
^{***)} Other liabilities consist of interest payables, guarantee deposits and lease liabilities.

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37. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Metode dan asumsi yang digunakan untuk perkiraan nilai wajar adalah sebagai berikut:

- a) Nilai wajar aset dan liabilitas keuangan tertentu, kecuali efek-efek yang diukur melalui biaya perolehan diamortisasi dan dimiliki hingga jatuh tempo, kredit yang diberikan, tagihan dan liabilitas derivatif, surat berharga yang diterbitkan dan pinjaman yang diterima mendekati nilai tercatatnya karena memiliki jangka waktu jatuh tempo yang singkat.

Estimasi nilai wajar terhadap aset keuangan tertentu ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga pasar uang yang berlaku untuk utang dengan risiko kredit dan sisa jatuh tempo yang serupa.

Estimasi nilai wajar terhadap liabilitas keuangan tertentu yang tidak memiliki kuotasi di pasar aktif ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga utang baru dengan sisa jatuh tempo yang serupa.

b) Efek-efek

Nilai wajar untuk efek-efek yang diukur melalui biaya perolehan diamortisasi dan dimiliki hingga jatuh tempo ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (broker)/pedagang efek (dealer). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa atau dinilai dengan menggunakan metode penilaian internal.

c) Kredit yang diberikan

Portofolio kredit Bank secara umum terdiri dari kredit yang diberikan dengan suku bunga mengambang dan suku bunga tetap. Kredit yang diberikan dinyatakan berdasarkan jumlah nilai tercatat. Nilai wajar dari kredit yang diberikan menunjukkan nilai diskon dari perkiraan arus kas masa depan yang diharapkan akan diterima oleh Bank. Perkiraan arus kas ini didiskontokan dengan menggunakan suku bunga pasar untuk menentukan nilai wajar.

37. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

Methods and assumptions used to estimate fair value are as follows:

- a) The fair values of certain financial assets and liabilities, except for securities measured at amortized cost and held-to-maturity, loans, derivative receivables and payables, marketable securities issued and fund borrowings approximate their carrying amount due to their short-term maturities.

The estimated fair values of certain financial assets are determined based on discounted cash flows using money market interest rates for debts with similar credit risk and remaining maturities.

The estimated fair values of certain financial liabilities that do not have a quotation in an active market are determined based on discounted cash flows using interest rates of new debts with similar remaining maturities.

b) Securities

The fair values of securities measured at amortized cost and held-to-maturity are based on the market prices or broker/dealer price quotations. When this information is not available, the fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics or using internal valuation model.

c) Loans

Generally, the Bank's portfolio consists of loans with floating and fixed interest rates. Loans are stated at carrying amount. The fair value of loans represents the discounted amount of estimated future cash flows expected to be received by the Bank. The estimated future cash flows is discounted using the current market rates to determine its fair value.

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37. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Metode dan asumsi yang digunakan untuk perkiraan nilai wajar adalah sebagai berikut (lanjutan):

d) Tagihan dan liabilitas derivatif

Nilai wajar atas instrumen derivatif yang dinilai menggunakan teknik penilaian dengan menggunakan komponen yang dapat diamati di pasar terutama adalah kontrak pertukaran mata uang. Teknik penilaian yang paling banyak digunakan meliputi model penilaian *forward* dan *swap* yang menggunakan perhitungan nilai kini. Model tersebut menggabungkan berbagai komponen yang meliputi kualitas kredit dari *counterparty*, nilai *spot* dan kontrak berjangka serta kurva tingkat suku bunga.

e) Surat berharga yang diterbitkan dan pinjaman yang diterima

Nilai wajar dihitung berdasarkan model diskonto arus kas dengan menggunakan tingkat suku bunga pasar untuk sisa periode jatuh tempo.

Tabel di bawah ini menyajikan instrumen keuangan yang diakui pada nilai wajar berdasarkan hirarki yang digunakan Bank untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan (Catatan 2b):

37. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

Methods and assumptions used to estimate fair value are as follows (continued):

d) Derivative receivables and payables

The estimated fair value of derivative instruments which are assessed by valuation techniques using currency exchange contracts as a main component that can be observed in market. The most commonly used valuation techniques are forward and swap model that using a current value calculations. The model combines various components include credit quality from counterparty, spot and forward contract and interest rate curves.

e) Marketable securities and fund borrowings

Fair value is calculated based on the discounted cash flow model using market interest rate for the remaining maturity period.

The following table presents financial instruments measured at fair value based on the hierarchy used by the Bank to determine and disclose the fair value of financial instruments (Note 2b):

31 Desember/December 31, 2021					
	Nilai wajar/ Fair value	Tingkat 1/ Level 1	Tingkat 2/ Level 2	Tingkat 3/ Level 3	
Aset keuangan					Financial assets
Nilai wajar melalui laba rugi					Fair value through profit or loss
Efek-efek	159.934.000	159.934.000	-	-	Securities
Nilai wajar melalui penghasilan komprehensif lain					Fair value through other comprehensive income
Efek-efek	2.320.510.098	2.320.510.098	-	-	Securities
Biaya perolehan diamortisasi					Amortized cost
Efek-efek	1.033.527.500	1.033.527.500	-	-	Securities
Kredit yang diberikan	9.364.391.577	-	7.525.102.408	1.839.289.169	Loans
Total aset keuangan	12.878.363.175	3.513.971.598	7.525.102.408	1.839.289.169	Total financial assets
Liabilitas keuangan					Financial liabilities
Liabilitas lainnya					Other liabilities
Surat berharga yang diterbitkan	244.795.750	244.795.750	-	-	Marketable securities issued
Pinjaman yang diterima	16.517.311	16.517.311	-	-	Fund borrowings
Liabilitas sewa	2.841.087	2.841.087	-	-	Lease Liabilities
Total liabilitas keuangan	264.154.148	264.154.148	-	-	Total financial liabilities

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37. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menyajikan instrumen keuangan yang diakui pada nilai wajar berdasarkan hirarki yang digunakan Bank untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan (Catatan 2b) (lanjutan):

	31 Desember/December 31, 2020			
	Nilai wajar/ Fair value	Tingkat 1/ Level 1	Tingkat 2/ Level 2	Tingkat 3/ Level 3
Aset keuangan				
Nilai wajar melalui laba rugi				
Efek-efek	551.320.000	551.320.000	-	-
Nilai wajar melalui penghasilan komprehensif lain				
Efek-efek	2.197.950.643	2.197.950.643	-	-
Biaya perolehan diamortisasi				
Efek-efek	619.978.421	619.978.421	-	-
Kredit yang diberikan	17.785.618.660	-	14.292.290.184	3.493.328.476
Total aset keuangan	21.154.867.724	3.369.249.064	14.292.290.184	3.493.328.476
Liabilitas keuangan				
Liabilitas lainnya				
Surat berharga yang diterbitkan	247.711.550	247.711.550	-	-
Pinjaman yang diterima	17.318.944	17.318.944	-	-
Liabilitas sewa	2.528.653	2.528.653	-	-
Total liabilitas keuangan	267.559.147	267.559.147	-	-

Financial assets
Fair value through profit or loss
Securities
Fair value through other comprehensive income
Securities
Amortized cost
Securities
Loans
Total financial assets
Financial liabilities
Other liabilities
Marketable securities issued
Fund borrowings
Lease Liabilities
Total financial liabilities

38. INFORMASI MENGENAI KOMITMEN DAN KONTINJENSI

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Komitmen		
Liabilitas komitmen		
Rupiah		
Fasilitas kredit yang diberikan kepada debitur yang belum digunakan	(522.416.123)	(903.225.355)
Dolar Amerika Serikat		
Fasilitas kredit yang diberikan kepada debitur yang belum digunakan	(63.947.971)	(39.463.785)
L/C yang tidak dapat dibatalkan yang masih berjalan dalam rangka impor	(2.049.054)	(14.328.754)
	(65.997.025)	(53.792.539)
Komitmen	(588.413.148)	(957.017.894)
Kontinjensi		
Liabilitas kontinjensi		
Rupiah		
Garansi bank yang diterbitkan	(5.822.010)	(57.478.990)
Dolar Amerika Serikat		
Garansi bank yang diterbitkan	-	(1.101.632)
Kontinjensi	(5.822.010)	(58.580.622)

Commitments
Commitment liabilities
Rupiah
Unused loan facilities
United States Dollar
Unused loan facilities
Irrevocable letters of credit
Commitments
Contingencies
Contingent liabilities
Rupiah
Guarantees issued
United States Dollar
Guarantees issued
Contingencies

Transaksi kepada pihak berelasi disajikan pada Catatan 35.

Transactions with related parties is presented in Note 35.

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39. SEGMENT OPERASI

Berikut ini adalah informasi segmen Bank berdasarkan segmen operasi:

39. OPERATION SEGMENT

Information concerning the operating segments of the Bank are as follows:

**Tanggal 31 Desember 2021 dan untuk Tahun yang Berakhir pada Tanggal Tersebut/
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Keterangan	Konsumer/ Consumer	Ritel/ Retail	Menengah/ Middle	Lainnya/ Others	Total	Description
Pendapatan bunga	119.117.133	398.219.490	805.365.208	324.483.213	1.647.185.044	Interest income
Beban bunga	(45.031.220)	(236.440.031)	(467.275.885)	(24.869.357)	(773.616.493)	Interest expense
Pendapatan bunga - neto	74.085.913	161.779.459	338.089.323	299.613.856	873.568.551	Interest income - net
Pendapatan operasi lainnya	13.649.313	13.195.089	40.997.143	42.913.299	110.754.844	Other operating income
Total pendapatan	87.735.226	174.974.548	379.086.466	342.527.155	984.323.395	Total income
Beban operasi lainnya	(35.310.811)	(78.470.212)	(130.297.484)	(158.658.971)	(402.737.478)	Other operating expenses
Penyisihan kerugian penurunan nilai	(18.206.975)	(70.902.121)	(3.783.631.186)	(12.321.934)	(3.885.062.216)	Provision for impairment losses
Total beban	(53.517.786)	(149.372.333)	(3.913.928.670)	(170.980.905)	(4.287.799.694)	Total expenses
Pendapatan (beban) non-operasional - neto	117.064	(95.535)	(171.953)	495.375	(334.951)	Non-operating Income (expense) - net
(Rugi) laba sebelum beban pajak penghasilan	34.334.504	25.506.680	(3.535.014.157)	174.041.625	(3.303.131.398)	(Loss) income before income tax expense
Manfaat (beban) pajak penghasilan - neto	(2.675.864)	(1.987.866)	275.501.757	(13.408.086)	257.429.941	Income tax benefit (expense) - net
(Rugi) laba tahun berjalan	30.658.640	23.518.814	(3.259.512.400)	158.633.539	(3.045.701.407)	(Loss) income for the year
Aset segmen						Segment of assets
Kredit yang diberikan	957.702.923	3.593.324.073	7.057.300.402	-	11.608.327.398	Loans
Cadangan kerugian penurunan nilai kredit yang diberikan	(29.729.878)	(394.310.714)	(1.451.361.251)	-	(1.875.401.843)	Allowance for impairment losses of loans
Non-kredit yang diberikan	920.659	5.029.408	93.306.495	7.039.857.456	7.139.114.018	Non-loans
Cadangan kerugian penurunan nilai non-kredit yang diberikan	(326.776)	(1.286.274)	(112.202)	(3.791.666)	(5.516.918)	Allowance for impairment losses of non-loans
	928.566.928	3.202.756.493	5.699.133.444	7.036.065.790	16.866.522.655	
Liabilitas segmen						Segment of liabilities
Pendanaan	811.695.240	4.261.870.905	8.422.725.583	-	13.496.291.728	Funding
Non-pendanaan	17.483.057	5.099.818	102.653.628	787.331.245	912.567.748	Non-funding
	829.178.297	4.266.970.723	8.525.379.211	787.331.245	14.408.859.476	

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39. SEGMENT OPERASI (lanjutan)

Berikut ini adalah informasi segmen Bank berdasarkan segmen operasi (lanjutan):

39. OPERATION SEGMENT (continued)

Information concerning the operating segments of the Bank are as follows (continued):

Tanggal 31 Desember 2020 dan untuk Tahun yang Berakhir pada Tanggal Tersebut/ As of December 31, 2020 and for the Year Then Ended						
Keterangan	Konsumer/ Consumer	Ritel/ Retail	Menengah/ Middle	Lainnya/ Others	Total	Description
Pendapatan bunga	129.611.041	432.397.144	1.058.793.269	310.723.332	1.931.524.786	Interest income
Beban bunga	(30.745.983)	(272.593.877)	(968.286.934)	(35.262.400)	(1.306.889.194)	Interest expense
Pendapatan bunga - neto	98.865.058	159.803.267	90.506.335	275.460.932	624.635.592	Interest income - net
Pendapatan operasi lainnya	4.684.538	10.436.036	6.745.989	49.481.144	71.347.707	Other operating income
Total pendapatan	103.549.596	170.239.303	97.252.324	324.942.076	695.983.299	Total income
Beban operasi lainnya	(26.368.824)	(72.719.400)	(207.432.369)	(9.299.424)	(315.820.017)	Other operating expenses
Penyisihan kerugian penurunan nilai	(4.305.137)	27.799.034	(340.100.746)	(5.906.192)	(322.513.041)	Provision for impairment losses
Total beban	(30.673.961)	(44.920.366)	(547.533.115)	(15.205.616)	(638.333.058)	Total expenses
Pendapatan (beban) non-operasional - neto	413.607	1.631.970	5.277.681	(901.742)	6.421.516	Non-operating income (expense) - net
Laba (rugi) sebelum beban pajak penghasilan	73.289.242	126.950.907	(445.003.110)	308.834.718	64.071.757	Income (loss) before income tax expense
(Beban) manfaat pajak penghasilan - neto	(37.531.338)	(65.011.417)	227.885.594	(158.153.914)	(32.811.075)	Income tax (expense) benefit - net
Laba (rugi) tahun berjalan	35.757.904	61.939.490	(217.117.516)	150.680.804	31.260.682	Income (loss) for the year
Aset segmen						Segment of assets
Kredit yang diberikan	1.158.292.578	4.828.323.066	13.505.318.148	-	19.491.933.792	Loans
Cadangan kerugian penurunan nilai kredit yang diberikan	(69.761.650)	(433.601.595)	(503.002.004)	-	(1.006.365.249)	Allowance for impairment losses of loans
Non-kredit yang diberikan	2.210.462	18.309.957	2.490.053	9.514.412.112	9.537.422.584	Non-loans
Cadangan kerugian penurunan nilai non-kredit yang diberikan	-	(379.971)	-	(7.118.894)	(7.498.865)	Allowance for impairment losses of non-loans
	1.090.741.390	4.412.651.457	13.004.806.197	9.507.293.218	28.015.492.262	
Liabilitas segmen						Segment of liabilities
Pendanaan	555.990.532	4.929.411.853	17.509.876.361	-	22.995.278.746	Funding
Non-pendanaan	18.684.046	12.152.124	43.441.313	658.245.822	732.523.305	Non-funding
	574.674.578	4.941.563.977	17.553.317.674	658.245.822	23.727.802.051	

Berikut ini adalah informasi segmen Bank berdasarkan segmen geografis:

Segment information based on geographical segment are as follows:

a) Pendapatan bunga neto dan operasi lainnya

a) Net interest income and other operating income

Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,				
	2021	2020		
Jabodetabek	764.982.767	446.729.056	Jabodetabek	
Jawa	(25.905.059)	(64.893.394)	Java	
Sumatera	77.458.616	90.056.641	Sumatera	
Kalimantan	155.877.791	213.859.231	Borneo	
Sulawesi	11.909.280	10.231.765	Sulawesi	
Total	984.323.395	695.983.299	Total	

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39. SEGMENT OPERASI (lanjutan)

Berikut ini adalah informasi segmen Bank berdasarkan segmen geografis (lanjutan):

b) Laba sebelum beban pajak penghasilan

	Tahun yang Berakhir pada Tanggal 31 Desember/ For the year Ended December 31,	
	2021	2020
Jabodetabek	(2.828.631.592)	183.128.059
Jawa	(217.277.150)	(252.411.916)
Sumatera	(327.550.361)	(71.387.376)
Kalimantan	97.271.529	201.551.681
Sulawesi	(26.943.774)	3.191.309
Total	(3.303.131.348)	64.071.757

c) Total aset

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Jabodetabek	15.141.962.756	24.840.642.020
Jawa	494.018.795	1.576.841.658
Sumatera	1.120.610.981	1.284.089.855
Kalimantan	277.583	264.419.362
Sulawesi	109.652.540	49.499.367
Total	16.866.522.655	28.015.492.262

d) Total liabilitas

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Jabodetabek	10.331.275.328	16.987.191.831
Jawa	2.064.576.526	2.239.266.077
Sumatera	1.930.241.435	4.152.242.178
Kalimantan	18.017	295.836.148
Sulawesi	82.748.170	53.265.817
Total	14.408.859.476	23.727.802.051

39. OPERATION SEGMENT (continued)

Segment information based on geographical segment are as follows (continued):

b) Income before income tax expense

	2021	2020
Jabodetabek	(2.828.631.592)	183.128.059
Java	(217.277.150)	(252.411.916)
Sumatera	(327.550.361)	(71.387.376)
Borneo	97.271.529	201.551.681
Sulawesi	(26.943.774)	3.191.309
Total	(3.303.131.348)	64.071.757

c) Total assets

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Jabodetabek	15.141.962.756	24.840.642.020
Java	494.018.795	1.576.841.658
Sumatera	1.120.610.981	1.284.089.855
Borneo	277.583	264.419.362
Sulawesi	109.652.540	49.499.367
Total	16.866.522.655	28.015.492.262

d) Total liabilities

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Jabodetabek	10.331.275.328	16.987.191.831
Java	2.064.576.526	2.239.266.077
Sumatera	1.930.241.435	4.152.242.178
Borneo	18.017	295.836.148
Sulawesi	82.748.170	53.265.817
Total	14.408.859.476	23.727.802.051

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**40. PERJANJIAN, KOMITMEN DAN KONTINJENSI
SIGNIFIKAN**

Perjanjian signifikan

1. Pada tanggal 23 Juni 2021 dan 27 Juli 2021, Bank mengadakan perjanjian dengan PT Sharing Vision sehubungan dengan pengadaan jasa *managed service security operation center* dan *project management* untuk *strategic initiative* dan *ITMP alignment* dengan nilai kontrak sebesar Rp4.794.665 dan Rp2.491.500.
2. Pada tanggal 22 Agustus 2020, Bank mengadakan perjanjian dengan PT Eikon Teknologi sehubungan dengan penyediaan aplikasi G Suite dengan nilai kontrak sebesar Rp903.980.
3. Pada tanggal 29 Juli 2020, Bank mengadakan perjanjian dengan PT Tridaya Asira sehubungan dengan pengadaan Aplikasi Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU-PPT) dengan nilai kontrak sebesar Rp999.680.
4. Pada tanggal 9 Maret 2020, Bank mengadakan perjanjian dengan PT Altha Consulting sehubungan dengan penyusunan *master plan* teknologi informasi dengan nilai kontrak sebesar Rp851.950.
5. Pada tanggal 10 Februari 2020, Bank mengadakan perjanjian dengan PT IP Network Solusindo sehubungan dengan pengembangan aplikasi Agrolink di Android dan IOS dengan nilai kontrak sebesar Rp652.930.

Liabilitas kontinjensi

Dalam melakukan usahanya, Bank menghadapi berbagai perkara hukum dan tuntutan dimana Bank sebagai tergugat, terutama sehubungan dengan kepatuhan dengan kontrak. Walaupun belum ada kepastian yang jelas, Bank berpendapat bahwa berdasarkan informasi yang ada dan keputusan terakhir dari perkara bahwa tuntutan hukum ini tidak akan berdampak secara material pada operasi, posisi keuangan atau tingkat likuiditas Bank.

**40. SIGNIFICANT AGREEMENTS, COMMITMENTS
AND CONTINGENCIES**

Significant agreement

1. On June 23, 2021 and July 27, 2021, the Bank entered into an agreement with PT Sharing Vision in connection with the procurement of managed service security operation center and project management for strategic initiative and ITMP alignment with a contract value amounted to Rp4,794,665 and Rp2,491,500.
2. On August 22, 2020, the Bank entered into an agreement with PT Eikon Teknologi in connection with the provision of G Suite application with a contract value amounted to Rp903,980.
3. On July 29, 2020, the Bank entered into an agreement with PT Tridaya Asira in connection with the procurement of the Anti Money Laundering and Prevention of Terrorism Funding (APU-PPT) application with contract value amounted to Rp999,680.
4. On March 9, 2020, the Bank entered into an agreement with PT Altha Consulting in connection with the preparation of an information technology master plan with a contract value amounted to Rp851,950.
5. On February 10, 2020, the Bank entered into an agreement with PT IP Network Solusindo in connection with the development of the Agrolink Android and IOS applications with a contract value amounted to Rp652,930.

Contingent liabilities

In the conduct of its business, the Bank is a defendant in various litigation proceedings and legal claims mainly with respect to matters of contractual compliance. Although there is no clear assurance yet, the Bank believes that based on information currently available, the ultimate resolution of these legal proceedings and legal claims will not likely to have a material effect on the operations, financial position or liquidity level of the Bank.

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**40. PERJANJIAN, KOMITMEN DAN KONTINJENSI
SIGNIFIKAN**

Liabilitas kontinjensi (lanjutan)

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank telah membentuk cadangan (disajikan dalam akun "Liabilitas Lain-lain") untuk sejumlah perkara sebesar Rp13.129.112 dan Rp2.637.028 (Catatan 26). Manajemen berpendapat bahwa jumlah cadangan yang dibentuk atas kemungkinan timbulnya kerugian.

**40. SIGNIFICANT AGREEMENTS, COMMITMENTS
AND CONTINGENCIES**

Contingent liabilities (continued)

As of December 31, 2021 and 2020 the Bank has established a provision (included in "Other Liabilities") for several litigation amounted to Rp13,129,112 and Rp2,637,028 (Note 26). Management believes that the provision is adequate to cover possible losses.

**41. JAMINAN PEMERINTAH TERHADAP
KEWAJIBAN PEMBAYARAN BANK UMUM**

Berdasarkan Keputusan Presiden No. 26 Tahun 1998 yang dilaksanakan melalui Keputusan Menteri Keuangan tanggal 28 Januari 1998 dan Surat Keputusan Bersama Direksi Bank Indonesia dan Ketua BPPN (SKB BI dan BPPN) No. 30/270/KEP/DIR dan No. 1/BPPN/1998 tanggal 6 Maret 1998, Pemerintah telah menjamin kewajiban tertentu dari seluruh bank umum yang berbadan hukum Indonesia.

Berdasarkan perubahan terakhir yang terdapat pada Keputusan Menteri Keuangan No. 179/KMK.017/2000 tanggal 26 Mei 2000, jaminan tersebut berlaku sejak tanggal 26 Januari 1998 sampai dengan 31 Januari 2001 dan dapat diperpanjang dengan sendirinya setiap 6 (enam) bulan berikutnya secara terus-menerus, kecuali apabila dalam waktu 6 (enam) bulan sebelum berakhirnya jangka waktu Program Penjaminan atau jangka waktu perpanjangannya, Menteri Keuangan mengumumkan pengakhiran dan atau perubahan Program Penjaminan tersebut untuk diketahui oleh umum. Atas penjaminan ini, Pemerintah membebaskan premi yang dihitung berdasarkan persentase tertentu sesuai ketentuan yang berlaku.

Sesuai dengan Peraturan Menteri Keuangan No. 17/PMK.05/2005 tanggal 3 Maret 2005, terhitung sejak tanggal 18 April 2005 jenis kewajiban bank umum yang dijamin berdasarkan Program Penjaminan Pemerintah meliputi giro, tabungan, deposito berjangka dan pinjaman yang diterima dari bank lain dalam bentuk transaksi pasar uang antar bank.

**41. GOVERNMENT GUARANTEE ON OBLIGATIONS
OF COMMERCIAL BANKS**

Based on Presidential Decision No. 26 Year 1998 as implemented by the Decision of the Ministry of Finance dated January 28, 1998 and the Joint Decrees No. 30/270/KEP/DIR and No. 1/BPPN/1998 dated March 6, 1998, of the Director of Bank Indonesia and Head of IBRA, the Government provided a guarantee on certain obligations of all locally incorporated commercial banks.

Based on the latest amendment under the Ministry of Finance Decision No. 179/KMK.017/2000 dated May 26, 2000, this guarantee is valid from January 26, 1998 up to January 31, 2001 and with automatic extension of the guarantee period continuously every 6 (six) months, unless within 6 (six) months before the maturity of the guarantee period or its extension period, the Ministry of Finance announced to the public the expiry and/or change in the guarantee program. For this guarantee, the Government charges premium which is computed based on a certain percentage in accordance with the prevailing regulations.

In accordance with Regulation No. 17/PMK.05/2005 dated March 3, 2005 of the Ministry of Finance, starting April 18, 2005, commercial bank obligations guaranteed by the Government Guarantee Program include demand deposits, saving deposits, time deposits and fund borrowings from other banks in the form of inter-bank money market transactions.

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**41. JAMINAN PEMERINTAH TERHADAP
KEWAJIBAN PEMBAYARAN BANK UMUM
(lanjutan)**

Program Penjaminan Pemerintah melalui UP3 telah berakhir pada tanggal 22 September 2005, sebagaimana dinyatakan dalam Peraturan Menteri Keuangan No. 68/PMK.05/2005 tanggal 10 Agustus 2005 tentang "Perhitungan dan Pembayaran Premi Program Penjaminan Pemerintah terhadap Kewajiban Pembayaran Bank Umum" untuk periode 1 Juli sampai dengan 21 September 2005. Sebagai pengganti UP3, Pemerintah telah membentuk lembaga independen yaitu Lembaga Penjamin Simpanan (LPS) berdasarkan Undang-undang No. 24 Tahun 2004 tanggal 22 September 2004 tentang "Lembaga Penjamin Simpanan", dimana LPS menjamin dana masyarakat termasuk dana dari bank lain dalam bentuk giro, deposito, sertifikat deposito, tabungan dan/atau bentuk lainnya yang dipersamakan dengan itu.

Suku bunga penjaminan LPS pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah masing-masing sebesar 3,50% dan 4,50% untuk simpanan dalam mata uang Rupiah dan masing-masing sebesar 0,25% dan 1,00% untuk simpanan dalam mata uang asing.

Berdasarkan Peraturan Pemerintah No. 66 Tahun 2008 tanggal 13 Oktober 2008 tentang "Besaran Nilai Simpanan yang Dijamin Lembaga Penjamin Simpanan" yang disempurnakan melalui peraturan LPS No. 2/PLPS/2010 tanggal 25 November 2010 tentang Program Penjaminan Simpanan Pasal 29, nilai simpanan setiap nasabah pada satu bank yang dijamin oleh Pemerintah adalah paling tinggi sebesar Rp2.000.000.000 (angka penuh).

**41. GOVERNMENT GUARANTEE ON OBLIGATIONS
OF COMMERCIAL BANKS (continued)**

The Government Guarantee Program through UP3 ended on September 22, 2005 based on Regulation No. 68/PMK.05/2005 dated August 10, 2005 of the Ministry of Finance regarding the "Calculation and Payment of the Premium on Government Guarantee Program on the Payment of Obligations of Commercial Banks" for the period of July 1 up to September 21, 2005. The Government established the Indonesia Deposit Insurance Corporation (IDIC), an independent agency, to replace UP3 based on Law No. 24 of 2004 dated September 22, 2004 regarding "Indonesia Deposit Insurance Corporation", in which IDIC guarantees public funds including funds from other banks in the form of demand deposits, time deposits, certificates of deposits, saving deposits and/or other similar forms.

LPS interest rates guarantee as of December 31, 2021 and 2020 were 3.50% and 4.50%, respectively, for deposits in Rupiah and 0.25% and 1.00%, respectively, for deposits in foreign currencies.

Based on with Government Regulation No. 66 Year 2008, dated October 13, 2008 regarding "The Amount of Public Savings Guaranteed by the Indonesia Deposit Insurance Corporation", amended through LPS Regulation No. 2/PLPS/2010 dated November 25, 2010 regarding the Deposit Insurance Program Article 29, the total amount of customers' saving accounts in banks which is guaranteed by the Government has increased to highest amount Rp2,000,000,000 (full amount).

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42. PERNYATAAN STANDAR AKUNTANSI KEUANGAN (PSAK) DAN INTERPRETASI STANDAR AKUNTANSI KEUANGAN (ISAK) YANG DIKELUARKAN DAN DIREVISI

Berikut ini ringkasan revisi dan amandemen PSAK dan ISAK yang diterbitkan oleh Dewan Standar Akuntansi Keuangan (DSAK) - IAI yang relevan untuk Bank, namun belum berlaku efektif untuk laporan keuangan pada tanggal 31 Desember 2021:

Efektif berlaku pada atau setelah tanggal 1 Januari 2022:

- a) Amendemen PSAK 22, "Kombinasi Bisnis tentang Referensi ke Kerangka Konseptual". Amendemen ini mengklarifikasi interaksi antara PSAK 22, PSAK 57, ISAK 30 dan Kerangka Konseptual Pelaporan Keuangan.
- b) Amendemen PSAK 57, "Provisi, Liabilitas Kontinjensi, dan Aset Kontinjensi tentang Kontrak Memberatkan - Biaya Memenuhi Kontrak". Amendemen ini mengklarifikasi biaya untuk memenuhi suatu kontrak dalam kaitannya dalam menentukan apakah suatu kontrak merupakan kontrak memberatkan.
- c) Penyesuaian Tahunan 2020 - PSAK 71, "Instrumen Keuangan - Imbalan dalam pengujian "10 persen" untuk penghentian pengakuan liabilitas keuangan". Amandemen tersebut mengklarifikasi biaya yang termasuk dalam entitas ketika menilai apakah persyaratan liabilitas keuangan baru atau yang dimodifikasi secara substansial berbeda dari persyaratan liabilitas keuangan asli.

Efektif berlaku pada atau setelah tanggal 1 Januari 2023:

Amendemen PSAK 1, "Penyajian Laporan Keuangan tentang Klasifikasi Liabilitas sebagai Jangka Pendek atau Jangka Panjang", efektif 1 Januari 2023, dan penerapan lebih awal diizinkan. Amandemen ini menentukan persyaratan untuk mengklasifikasikan kewajiban sebagai lancar atau tidak lancar.

Saat ini, Bank sedang mengevaluasi dan belum menetapkan dampak dari PSAK yang dikeluarkan dan direvisi tersebut terhadap laporan keuangannya.

42. ISSUED AND REVISED STATEMENTS OF FINANCIAL ACCOUNTING STANDARDS (SFAS) AND INTERPRETATION OF FINANCIAL ACCOUNTING STANDARDS (IFAS)

The following summarizes the revised and amended SFAS and the IFAS which were issued by the Financial Accounting Standards Board (FASB) are relevant to the Bank, but not yet effective to the Bank on financial statements as of December 31, 2021:

Effective on or after January 1, 2022:

- a) Amendments to SFAS 22, "Business Combinations on Reference to Conceptual Frameworks". This amendment clarifies the interaction between SFAS 22, SFAS 57, IFAS 30 and the Conceptual Framework of Financial Reporting.
- b) Amendments to SFAS 57, "Provisions, Contingent Liabilities, and Contingent Assets concerning Onerous Contracts - Cost of Fulfilling the Contracts". This amendment clarifies the cost of fulfilling a contract in relation to determining whether a contract is an onerous contract.
- c) 2020 Annual Adjustment - SFAS 71, "Financial Instruments - Fee under "10 percent" test for derecognition of financial liabilities". The amendments clarify the costs included in the entity when assessing whether the terms of the new or modified financial liabilities are substantially different from the terms of the original financial liabilities.

Effective on or after January 1, 2023:

Amendments to SFAS 1, "Presentation of Financial Statements concerning the Classification of Liabilities as Short-Term or Long-Term", effective January 1, 2023, and earlier application is permitted. These amendments specify the requirements for classifying a liability as current or non-current.

The Bank is presently evaluating and has not yet determined the effects of these issued and revised SFAS on its financial statements.

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43. INFORMASI TAMBAHAN

Manajemen Modal

Tujuan manajemen permodalan Bank adalah untuk mempertahankan posisi modal yang kuat untuk mendukung pertumbuhan bisnis dan mempertahankan investor, deposan, pelanggan dan kepercayaan pasar. Dalam pengelolaan permodalan, Bank mempertimbangkan faktor-faktor seperti: pengembalian modal yang optimal pada pemegang saham dan menjaga keseimbangan antara keuntungan yang lebih tinggi dan keamanan yang diberikan oleh posisi modal yang sehat.

Rasio Kewajiban Penyediaan Modal Minimum (CAR)

Bank secara aktif mengelola modalnya sesuai dengan peraturan yang berlaku. Tujuan utamanya adalah untuk memastikan bahwa setiap saat Bank dapat menjaga kecukupan modalnya untuk menutup risiko bawaan (inherent risk) pada kegiatan perbankan tanpa mengurangi optimalisasi nilai pemegang saham.

CAR pada tanggal-tanggal 31 Desember 2021 dan 2020 dihitung berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 34/POJK.03/2016 tentang Perubahan atas POJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dimana modal untuk risiko kredit terdiri dari modal inti (modal inti utama/*Common Equity Tier 1* dan modal inti tambahan) dan modal pelengkap.

Berdasarkan POJK No. 34/POJK.03/2016, PBI No. 17/22/PBI/2015 tentang Kewajiban Pembentukan *Countercyclical Buffer* dan POJK No. 46/POJK.03/2015 tentang *Penetapan Systemically Important Bank* dan *Capital Surcharge*, selain kewajiban penyediaan modal minimum sesuai profil risiko, Bank wajib membentuk tambahan modal penyangga (buffer) berupa *Capital Conservation Buffer*, *Countercyclical Buffer* dan *Capital Surcharge*, yang wajib dibentuk secara bertahap mulai tanggal 1 Januari 2016.

43. OTHER DISCLOSURES

Capital Management

The Bank's capital management objective is to maintain a strong capital position to support business growth and to sustain investor, depositor, customer and market confidence. In managing its capital, the Bank considers factors such as: an optimal capital rate of return to shareholders and maintain a balance between high return and safety provided by a sound capital position.

Capital Adequacy Ratio (CAR)

Bank actively manages its capital in accordance with the regulatory requirements. The primary objective is to ensure that Bank, at all the times, maintains adequate capital to cover inherent risks to its banking activities without reducing the optimization of shareholder's value.

CAR as of December, 31, 2021 and 2020 was calculated based on Financial Service Authority Regulation (POJK) No. 34/POJK.03/2016 concerning Amendment to POJK No. 11/POJK.03/2016 on Minimum Capital Requirement for Commercial Banks where capital for credit risk consists of core capital (Common Equity Tier 1 and additional Tier 1) and supplementary capital.

Based on POJK No. 34/POJK.03/2016, PBI No. 17/22/PBI/2015 regarding the Mandatory Formation of Countercyclical Buffer and POJK No. 46/POJK.03/2015 regarding the Determination of Systemically Important Banks and Capital Surcharges, in addition to the minimum capital requirement in accordance with the risk profile, Bank is required to form additional capital (buffer), in the form of Capital Conservation Buffer, Countercyclical Buffer, and Capital Surcharge, which must be formed gradually since January 1, 2016.

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43. INFORMASI TAMBAHAN (lanjutan)

Rasio Kewajiban Penyediaan Modal Minimum (CAR) (lanjutan)

Pada tanggal 31 Desember 2020, sesuai dengan surat OJK No. S.11/D.03/2020 tanggal 27 Mei 2020, pembentukan modal penyangga (buffer) berupa *Capital Conservation Buffer* diiadakan sampai dengan tanggal 31 Maret 2021. Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank telah membentuk *Countercyclical Buffer* masing-masing sebesar 0% dari kisaran yang ditetapkan sebesar 0% sampai dengan 2,5% dari Aset Tertimbang Menurut Risiko (ATMR). Sedangkan, untuk *Capital Conservation Buffer* dan *Capital Surcharge*, Bank tidak diwajibkan untuk melakukan pembentukan.

Berdasarkan profil risiko Bank pada 30 Juni 2021 dan 2020 yaitu *fair*, maka CAR minimum tanggal 31 Desember 2021 dan 2020 masing-masing ditetapkan sebesar paling rendah 10% sampai dengan kurang dari 11%.

Penentuan kepatuhan Bank terhadap peraturan dan rasio yang berlaku didasarkan pada peraturan praktik akuntansi yang berbeda dalam beberapa hal dengan Standar Akuntansi Keuangan di Indonesia.

Pada tanggal-tanggal 31 Desember 2021 dan 2020, Bank telah memenuhi rasio sesuai yang disyaratkan OJK untuk rasio kecukupan modal.

Perhitungan CAR Bank pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Modal		
Modal Inti (Tier 1)		
Modal Inti Utama (CET-1)	2.083.284.899	4.164.447.640
Modal Inti Tambahan (AT-1)	-	-
Total Modal Inti (Tier 1)	2.083.284.899	4.164.447.640
Modal Pelengkap (Tier 2)	74.786.146	140.582.858
Total Modal	2.158.071.045	4.305.030.498
Aset Tertimbang Menurut Risiko (ATMR)		
ATMR untuk Risiko Kredit setelah memperhitungkan Risiko Spesifik ⁽¹⁾	9.228.325.021	16.329.042.829
ATMR untuk Risiko Pasar ⁽²⁾	60.686.638	82.879.504
ATMR untuk Risiko Operasional ⁽³⁾	1.375.546.083	1.281.882.000
Total ATMR	10.664.557.742	17.693.804.333

43. OTHER DISCLOSURES (continued)

Capital Adequacy Ratio (CAR) (continued)

On December 31, 2020, in accordance with OJK letter No. S.11/D.03/2020 dated May 27, 2020, the provision of buffer capital in the form of *Capital Conservation Buffer* will be eliminated until March 31, 2021. As of December 31, 2021 and 2020, the Bank has formed a *Countercyclical Buffer* in the amount of 0% of the determined range from 0% to 2.5% of the Risk Weighted Assets (RWA), respectively. Meanwhile, for the *Capital Conservation Buffer* and *Capital Surcharge*, the Bank are not required to make any provision.

Based on the Bank's risk profile as of June 30, 2021 and 2020 that is *fair*, the minimum CAR as of December 31, 2021 and 2020 should be at least 10% to less than 11%, respectively.

The determination of Bank's compliance with regulatory and ratios requirements is based on the regulatory accounting practices which differ from Indonesian Financial Accounting Standards in some aspects.

As of December 31, 2021 and 2020, the Bank has complied with the OJK's requirements regarding the capital adequacy ratio.

The computation of the Bank's CAR as of December 31, 2021 and 2020, are as follows:

Capital
Core Capital (Tier 1)
Common Equity (CET 1)
Additional Tier (AT-1)
Total Core Capital (Tier 1)
Supplementary Capital (Tier 2)
Total Capital
Risk Weighted Assets (RWA)
RWA for Credit Risk after considering Specific Risk ⁽¹⁾
RWA for Market Risk ⁽²⁾
RWA for Operational Risk ⁽³⁾
Total RWA

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43. INFORMASI TAMBAHAN (lanjutan)

Rasio Kewajiban Penyediaan Modal Minimum (CAR) (lanjutan)

Perhitungan CAR Bank pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/ December 31, 2021	31 Desember/ December 31, 2020
Rasio CAR		
Rasio CET 1	19,53%	23,54%
Rasio Tier 1	19,53%	23,54%
Rasio Tier 2	0,70%	0,79%
Rasio Total	20,24%	24,33%
Rasio Minimum CET 1	4,50%	4,50%
Rasio Minimum Tier 1	6,00%	6,00%
CAR Minimum Berdasarkan Profil Risiko	9,94%	10,71%

- *) Risiko kredit dihitung berdasarkan SE OJK No. 42/SEOJK.03/2016 tanggal 28 September 2016.
 **) Risiko pasar dihitung berdasarkan SE OJK No. 38/SEOJK.03/2016 tanggal 8 September 2016.
 ***) Risiko operasional dihitung berdasarkan SE OJK No. 24/SEOJK.03/2016 tanggal 14 Juli 2016.

43. OTHER DISCLOSURES (continued)

Capital Adequacy Ratio (CAR) (continued)

The computation of the Bank's CAR as of December 31, 2021 and 2020, are as follows:

	CAR Ratio
	CET 1 Ratio
	Tier 1 Ratio
	Tier 2 Ratio
	Total Ratio
	CET 1 Minimum Ratio
	Tier 1 Minimum Ratio
	Minimum CAR Based on Risk Profile

- *) Credit risk is calculated based on OJK's Circular Letter No. 42/SEOJK.03/2016 dated September 28, 2016.
 **) Market risk is calculated based on OJK's Circular Letter No. 38/SEOJK.03/2016 dated September 8, 2016.
 ***) Operational risk is calculated based on OJK's Circular Letter No. 24/SEOJK.03/2016 dated July 14, 2016.

44. TAMBAHAN INFORMASI ARUS KAS AKTIVITAS PENDANAAN

44. ADDITIONAL CASHFLOW INFORMATION

Arus kas/Cashflow					
	31 Desember/ December 31, 2020	Penerimaan/ Reception	Pembayaran/ Payment	Perubahan non-kas/ Non-cash changes	31 Desember/ December 31, 2021
Surat berharga yang diterbitkan	238.615.701	-	-	247.227	238.862.928
Pinjaman yang diterima	17.318.944	-	(801.633)	-	16.517.311
	255.934.645	-	(801.633)	247.227	255.380.239
Arus kas/Cashflow					
	31 Desember/ December 31, 2019	Penerimaan/ Reception	Pembayaran/ Payment	Perubahan non-kas/ Non-cash changes	31 Desember/ December 31, 2020
Surat berharga yang diterbitkan	499.159.359	-	(261.000.000)	456.342	238.615.701
Pinjaman yang diterima	-	17.318.944	-	-	17.318.944
	499.159.359	17.318.944	(261.000.000)	456.342	255.934.645

Aktivitas Bank yang tidak mempengaruhi arus kas untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 adalah amortisasi atas biaya emisi surat berharga yang diterbitkan masing-masing sebesar Rp247.227 dan Rp456.342 (Catatan 2w).

The Bank's activity which doesn't affect cash flows for the year ended December 31, 2021 and 2020 are the amortization issuance cost of securities issued amounting to 247,227 and Rp456,342, respectively (Note 22).

The original financial statements included herein are in the Indonesian language.

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46. PENYELESAIAN LAPORAN KEUANGAN

Manajemen Bank bertanggung jawab atas penyusunan laporan keuangan yang diselesaikan dan disetujui untuk diterbitkan pada tanggal 28 Maret 2022.

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46. COMPLETION OF THE FINANCIAL STATEMENTS

The management of the Bank is responsible for the preparation of these financial statements which were completed and authorized for issue on March 28, 2022.

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Sustainability Report



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