

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/SEOJK.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/SEOJK.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.

accordance with applicable regulations, and assessing the overall risk composition in the Bank's portfolio.

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.

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.

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.

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.

Penerapan manajemen risiko di Bank Raya meliputi empat pilar utama dan secara ringkas dijabarkan di bawah ini.

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	<p>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:</p> <ol style="list-style-type: none"> 1. <i>First Line of Defense</i> 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. 2. <i>Second Line of Defense</i> 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. 3. <i>Third Line of Defense</i> 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	<p>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:</p> <ol style="list-style-type: none"> 1. <i>First Line of Defense</i> 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. 2. <i>Second Line of Defense</i> 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. 3. <i>Third Line of Defense</i> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> a) Ketentuan <i>Loan Portfolio Guideline</i> (LPG) b) Ketentuan PDWK berjenjang
Pillar 2 Adequacy of Policies, procedures and Limits	<ul style="list-style-type: none"> a) Terms of <i>Loan Portfolio Guideline</i> (LPG) b) PDWK tiered provisions

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
<p>Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko</p>	<p>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.</p> <p>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.</p> <p>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>.</p> <p>d) Pengendalian risiko kredit dilakukan melalui:</p> <ul style="list-style-type: none"> • 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
<p>Pillar 3 Risk Management Process and Risk Management Information System</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>d) Credit risk control is carried out through:</p> <ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> 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 (LAS)</i> 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	<ul style="list-style-type: none"> 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 (LAS)</i> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> a) Kebijakan, prosedur, dan limit risiko pasar yang tertuang dalam Limit profil risiko pasar dan Limit aktivitas <i>treasury (Limit Dealer)</i> b) Kebijakan <i>Interest Rate Riskin The Banking Book (IRRBB)</i> 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	<ul style="list-style-type: none"> a) Market risk policies, procedures and limits as stated in Market risk profile limits and treasury activity limits (Dealer Limits) 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
<p>Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko</p>	<p>a) Identifikasi</p> <ol style="list-style-type: none"> 1. 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>. 2. Faktor risiko yang diperhitungkan dalam risiko suku bunga dalam metode standar yaitu: <ul style="list-style-type: none"> - 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. 3. 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). 4. Faktor risiko yang diperhitungkan dalam risiko suku bunga dalam perhitungan <i>Interest rate risk in the Banking Book</i> (IRRBB) yaitu: <ul style="list-style-type: none"> - <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. <p>b) Pengukuran</p> <ol style="list-style-type: none"> 1. 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. 2. 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>). 3. Melakukan <i>stress testing</i> risiko pasar secara berkala atau sesuai dengan keadaan pasar <p>c) Pemantauan dan Pengendalian Dalam melakukan proses manajemen risiko pasar, Direksi secara rutin melakukan evaluasi risiko pasar melalui laporan harian posisi Devisa neto, forum <i>Asset & Liability Committee</i> (ALCO), <i>Risk Management Committee</i> (RMC) serta laporan eksposur risiko pasar melalui <i>dashboard</i> profil risiko pasar.</p>

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pillar 3 Risk Management Process and Risk Management Information System	<p>a) Identification</p> <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> - 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. <p>b) Measurement</p> <ol style="list-style-type: none"> 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 <p>c) Monitoring and Control</p> <p>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.</p>

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 4 Sistem pengendalian Intern Manajemen risiko	<p>a) Pemisahan fungsi <i>front, middle and back office</i>. Fungsi manajemen risiko pasar terdiri dari unit kerja <i>front office (desk treasury), middle office (desk rmg)</i>, dan <i>back office (divisi operasional)</i> dengan masing-masing memiliki kewenangan sebagai berikut:</p> <ol style="list-style-type: none"> Jajaran <i>front office</i> berwenang melakukan transaksi instrumen keuangan dan bertanggung jawab memantau pergerakan harga pasar. 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 (MTM)</i>. Jajaran <i>back office</i> melakukan <i>settlement</i> transaksi <i>treasury</i> dan secara harian menetapkan harga pasar (<i>mtm</i>) pada akhir hari. Pelaksanaan delegasi kewenangan diwujudkan melalui penetapan limit transaksi secara berjenjang sesuai dengan kompetensi dan pengalaman. <p>b) Bank Raya telah mengimplementasikan sistem aplikasi <i>treasury (OSTS)</i> yang merupakan suatu sistem yang terintegrasi yang digunakan oleh fungsi <i>front office, 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, limit open position, limit Uncommitted Credit Line (UCL), cut loss limit, 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>.</p> <p>c) Integrasi antara pelampauan limit risiko pasar dengan penilaian kinerja unit kerja bisnis.</p>
Pilar 4 Internal control system Risk management	<p>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 (<i>operational division</i>) with each having the following authorities:</p> <ol style="list-style-type: none"> The front office is authorized to transact financial instruments and is responsible for monitoring market price movements. The middle office ranks and monitors market risk limits and periodically ensures market data (<i>market price</i>) used for <i>mark- to-market (MTM)</i>. The back office performs settlement of treasury transactions and sets the market price (<i>mtm</i>) 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. <p>b) Bank Raya has implemented a treasury application system (<i>OSTS</i>) 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 (<i>UCL</i>) 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>.</p> <p>c) Integration between exceeding market risk limits and evaluating the performance of business work units.</p>

Risiko Likuiditas

Liquidity Risk

Pilar Pillar	Upaya Mitigasi Risiko Risk Mitigation Efforts
Pilar 1 Pengawasan aktif Dewan Komisaris dan Direksi	<ol style="list-style-type: none"> Pelaksanaan rapat pra ALCO dan Pelaksanaan pra RMC triwulanan yang membahas mengenai isu strategis terkait dengan pengelolaan risiko perusahaan Pelaksanaan ALCO setiap bulan
Pillar 1 Active supervision of the Board of Commissioners and the Board of Directors	<ol style="list-style-type: none"> Implementation of pre ALCO meeting and Implementation of quarterly pre RMC which discusses strategic issues related to company risk management 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
<p>Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko</p>	<p>Proses penerapan Manajemen risiko operasional dilakukan melalui tahapan identifikasi, pengukuran, pemantauan, dan pengendalian risiko, sebagai berikut:</p> <ol style="list-style-type: none"> 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 (RCSA)</i> Pengendalian risiko dilakukan antara lain melalui: <ul style="list-style-type: none"> - Penetapan dan <i>monitoring</i> rencana tindak Lanjut atas setiap kejadian risiko operasional hasil pengukuran RCSA - <i>Risk Control Self Assessment (rcsa)</i> 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)/<i>Loss event Database (LED)</i> 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.
<p>Pillar 3 Risk Management Process and Risk Management Information System</p>	<p>The process of implementing operational risk management is carried out through the stages of identification, measurement, monitoring, and risk control, as follows:</p> <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> - 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.
<p>Pilar 4 Sistem pengendalian Intern Manajemen risiko</p>	<ol style="list-style-type: none"> 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.
<p>Pillar 4 Internal control system Risk management</p>	<ol style="list-style-type: none"> Separation of <i>Maker-Checker-Signer</i> functions in banking operational activities , where approval of most operational processes has been embedded in the <i>Core Banking</i> 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.
Pilar 2 Kecukupan Kebijakan, prosedur, dan penetapan Limit	<p>Kebijakan dan prosedur manajemen risiko Kepatuhan, antara lain:</p> <ul style="list-style-type: none"> 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	<p>Compliance risk management policies and procedures, including:</p> <ul style="list-style-type: none"> 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.
Pilar 3 Proses Manajemen risiko dan Sistem Informasi Manajemen risiko	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> a) Bagian Hukum telah menyusun pedoman Hukum yang disosialisasikan ke seluruh Unit Kerja. b) Parameter dan limit risiko hukum telah ditetapkan dan di-<i>review</i> secara berkala setiap tahun
Pillar 2 Adequacy of Policies, procedures and Limits	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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
<p>Pilar 4 Sistem pengendalian Intern Manajemen risiko</p>	<p>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:</p> <ol style="list-style-type: none"> 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>Mop</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.
<p>Pillar 4 Internal control system Risk management</p>	<p>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:</p> <ol style="list-style-type: none"> 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
	<ul style="list-style-type: none"> 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
Pilar 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.
Pilar 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.
Pilar 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> .
Pillar 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.
Pillar 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.
Pillar 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	<ul style="list-style-type: none"> 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.
Pillar 3 Risk Management Process and Risk Management Information System	<ul style="list-style-type: none"> 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 (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."