



Tata Kelola Perusahaan

Good Corporate Governance



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Dasar Penerapan Tata Kelola Perusahaan

Basis of Good Corporate Governance Implementation

Penerapan tata kelola perusahaan yang baik (*Good Corporate Governance/GCG*) merupakan fondasi yang penting bagi Bank. Mengingat pengelolaan perbankan yang handal memiliki peran kunci dalam perekonomian nasional, Bank mengakui pentingnya penerapan GCG di semua aktivitas bisnis dan operasionalnya, khususnya di masa perubahan dan perkembangan serba cepat yang dipicu pandemi COVID-19 dan makin pentingnya layanan digital bagi Bank dan nasabahnya.

Implementation of Good Corporate Governance (GCG) is an important foundation for the Bank. As sound management of Indonesia's banking system plays a key role in national economic growth, the Bank acknowledges how important it is to ensure that GCG is implemented in all business and operational activities, particularly during periods of rapid change and development such as the COVID-19 pandemic and the rising importance of digital services to the Bank and its customers.

Penerapan GCG di Bank mengacu pada ketentuan yang ditetapkan Undang Undang Perseroan Terbatas, Undang Undang Perbankan, Peraturan Otoritas Jasa Keuangan dan Bank Indonesia, serta kebijakan dan prosedur internal Bank.

The implementation of GCG at the Bank refers to regulations set out in the Limited Liability Companies legislation, Banking legislation, OJK and Bank Indonesia regulations, as well as the Bank's internal policies and procedures.

Tata Kelola
Perusahaan

Good
Corporate
Governance



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Struktur Tata Kelola Perusahaan

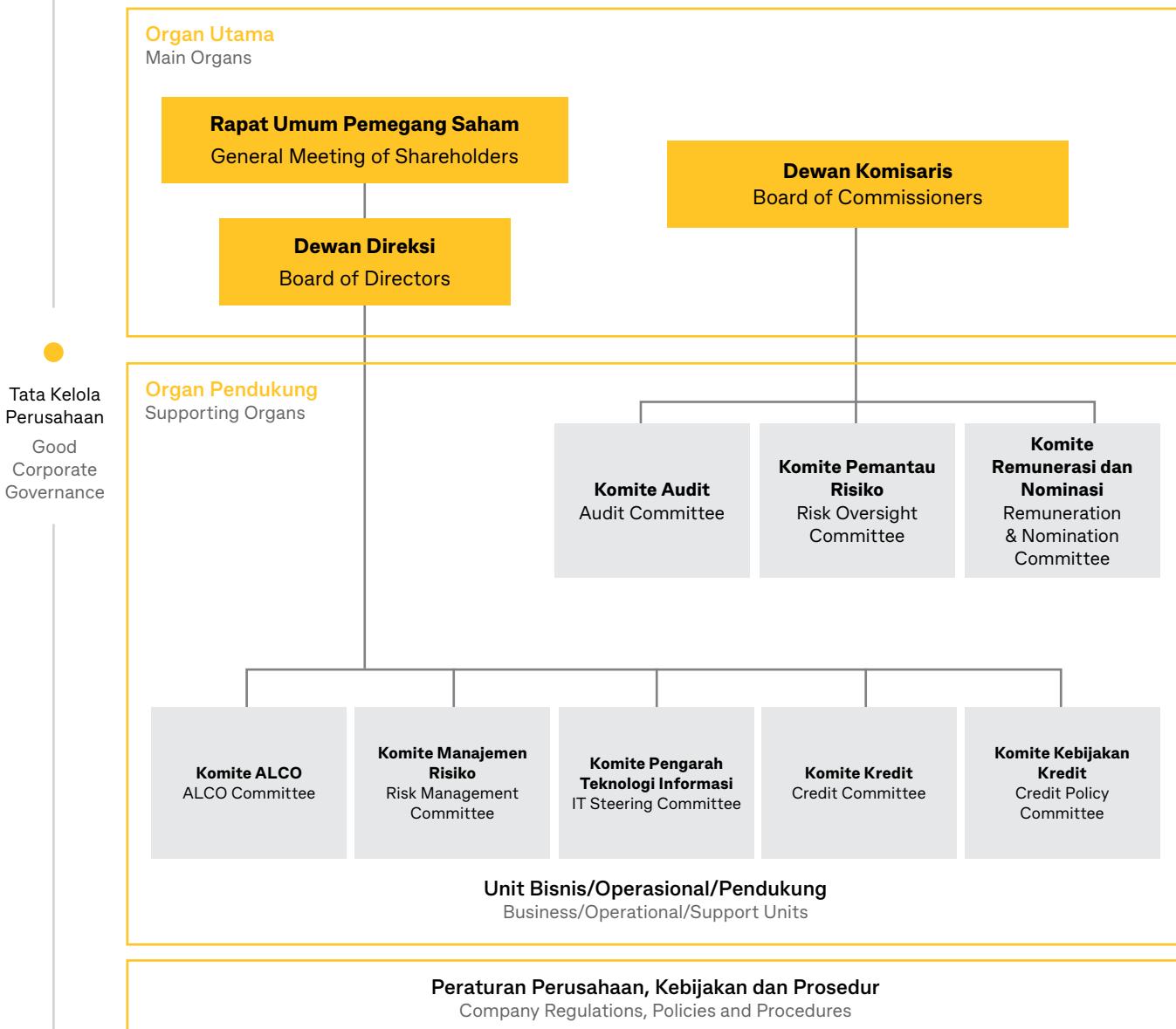
Organ-organ utama Bank dalam pelaksanaan GCG secara umum terdiri dari:

- Rapat Umum Pemegang Saham
- Dewan Komisaris
- Direksi
- Komite Pemantau Risiko
- Komite Audit
- Komite Remunerasi dan Nominasi
- Komite-komite di bawah Direksi
- Satuan Kerja Independen
- Unit Kerja Pendukung

Structure of Good Corporate Governance

The main organs that promote GCG implementation at the Bank generally consist of:

- General Meeting of Shareholders
- Board of Commissioners
- Board of Directors
- Risk Monitoring Committee
- Audit Committee
- Remuneration and Nomination Committee
- Committees under the Board of Directors
- Independent Work Units
- Supporting Work Units



Penerapan Tata Kelola

Bank senantiasa berusaha untuk menerapkan prinsip-prinsip GCG dalam aktivitas bisnisnya.

a. Transparansi

Mengemukakan informasi, baik terkait keuangan maupun non keuangan, secara akurat kepada pemangku kepentingan, serta terbuka dalam proses pengambilan keputusan Bank.

b. Tanggung jawab

Memberikan jaminan pengurusan kegiatan operasional mengikuti aturan dan perundang-undangan yang relevan serta melaksanakan tanggung jawab terhadap masyarakat dan lingkungan

c. Independensi

Memastikan Bank dikelola secara independen, sesuai peran dan fungsi masing-masing, sehingga bebas dari tekanan pihak manapun dan setiap pengambilan keputusan dilakukan secara profesional.

d. Akuntabilitas

Memberikan kesejalan fungsi, struktur, sistem, dan pelaksanaan tugas dan tanggung jawab setiap organ tata kelola Bank.

e. Kewajaran

Memastikan perlakuan yang setara dan adil dalam memenuhi hak para pemangku kepentingan.

Selama tahun 2021, Bank telah menjalankan berbagai inisiatif untuk meningkatkan penerapan GCG, termasuk:

1. Mengangkat 1 (satu) anggota Direksi lokal guna memenuhi komposisi anggota Direksi berkewarganegaraan Indonesia lebih dari 50%.
2. Memastikan bahwa Bank sebagai Emitter telah memenuhi persyaratan maupun kewajibannya sebagai Emitter sesuai Undang-Undang dan Peraturan Otoritas Jasa Keuangan Pasar Modal antara lain aspek keterbukaan informasi dan transparansi, kewajiban pelaporan kepada Bursa Efek (IDX).
3. Menerbitkan Prosedur Manajemen *Obligation* (kewajiban) sebagai upaya untuk menjaga kepatuhan Bank terhadap peraturan dengan mengidentifikasi kontrol-kontrol yang tersedia pada masing-masing unit kerja.
4. Meningkatkan penerapan strategi *anti-fraud* dengan mengintegrasikan unit-unit kerja yang mendukung pelaksanaan strategi *anti-fraud* dalam Satuan Kerja Manajemen Risiko.

Implementation of Good Corporate Governance

The Bank continuously strives to implement GCG in its business activities.

a. Transparency

Disclosing information, both financial and non-financial, accurately to stakeholders, and being transparent in Bank decision-making.

b. Responsibility

Providing assurance that the Bank's management of operational activities are in compliance with relevant laws and regulations as well as being responsible in regards to the community and environment.

c. Independency

Ensuring that the Bank is managed independently, according to each of its roles and functions, unobstructed from the influences of other parties, and that each decision is made in a professional manner.

d. Accountability

Providing clarity of the functions, accountable bodies, systems, and duties and responsibilities to drive good governance across the Bank.

e. Fairness

Ensuring fair and equal treatment is applied in fulfilling the rights of each stakeholder.

Throughout 2021, the Bank has performed initiatives to support the implementation of GCG, including:

1. Appointed 1 (one) Indonesian national as a member of the Board of Directors in order to meet the requirement of more than 50% of the Board having Indonesian nationality.
2. Ensured that the Bank as an Issuer has met the requirements and its obligations as an Issuer according to the law and OJK – Capital Market regulations, including transparency of information and obligations to report to the Indonesian Stock Exchange (IDX).
3. Published Obligation Management Procedures as an initiative to maintain the Bank's compliance of regulations by identifying obligations controls in each work unit.
4. Improved the implementation of its anti-fraud framework by integrating functions that support anti-fraud strategy implementation within the Risk Management directorate.

Penilaian Penerapan GCG

Sesuai dengan peraturan OJK No.55/POJK.03/2016 dan Surat Edaran OJK No.13/SEOJK.03/2017 Penerapan Tata Kelola yang Bagi Bank Umum, Bank melakukan self-assessment atas komponen-komponen dalam pelaksanaan GCG secara berkala berdasarkan *governance system* yang terdiri dari 3 (tiga) aspek tata kelola yaitu *governance structure*, *governance process* dan *governance outcome*.

Hasil penilaian sendiri GCG Bank Posisi Juni dan Desember 2021

Entitas Entity	Peringkat Komposit Composite Rating	Definisi Peringkat Definition of Rating
Bank	2 (Baik) 2 (Good)	Manajemen Bank telah melakukan penerapan GCG yang secara umum baik dan penuhan atas prinsip-prinsip GCG sudah memadai. Kelemahan penerapan prinsip GCG secara umum kurang signifikan dalam kegiatan operasional dan dapat diselesaikan dengan baik oleh manajemen Bank. The Bank management has implemented GCG well and is generally sufficient in practising the GCG principles. Weaknesses in implementing GCG principles in general are insignificant in the Bank's operational activities, and the management are capable of resolving them effectively.

Analisa Penilaian Sendiri atas Penerapan GCG

Berdasarkan hasil penilaian sendiri terhadap 11 (sebelas) faktor GCG, Bank memiliki tata kelola struktur (*governance structure*) dan proses (*governance process*) yang memadai dalam mendukung hasil tata kelola (*governance outcome*), antara lain:

1. Pelaksanaan tugas dan tanggung jawab Direksi

Rapat Umum Pemegang Saham Luar Biasa (RUPS-LB) tanggal 24 Maret 2021 dengan Nomor Keputusan SHR/RES/2021/III/001, menyetujui pengangkatan Bagus Harimawan sebagai Direktur Perseroan. Pengangkatan ini telah mendapat persetujuan OJK sehingga komposisi anggota Direksi Bank mayoritas adalah berkewarganegaraan Indonesia yaitu:

Presiden Direktur	:	Lauren Sulistiawati
Direktur	:	Ming Hong Chen
Direktur	:	Timothy Christopher Delahunty
Direktur	:	Bagus Harimawan
Direktur Kepatuhan	:	Yessika Effendi

Seluruh anggota Direksi telah memenuhi persyaratan integritas, kompetensi dan reputasi keuangan serta mendapatkan persetujuan OJK. Direksi telah melaksanakan tugas dan tanggung jawabnya sebagaimana diatur dalam Anggaran Dasar dan Charter Direksi. Anggota Direksi Bank tidak memiliki rangkap jabatan yang dituangkan dalam pernyataan Manajemen Konflik dan *Outside Business Interest*.

Assessment of GCG Implementation

In accordance with OJK regulation No.55/POJK.03/2016 and OJK Circular Letter (SEOJK) No.13/SEOJK.03/2017 on the Implementation of Governance for Commercial Banks, the Bank conducts periodic self-assessments of components of its GCG implementation based on a governance system consisting of 3 (three) aspects of governance including governance structure, governance process, and governance outcomes.

Results of self-assessments of the Bank's GCG implementation in June and December 2021

Analysis of GCG Implementation Self-Assessment

Based on the results of the 2021 GCG self-assessments, the Bank has an appropriate structure and processes for the 11 (eleven) assessment factors supporting GCG implementation in the Bank:

1. Implementation of the Board of Directors duties and responsibilities

Extraordinary General Meeting of Shareholders (EGMS) on 24 March 2021 with Decision Number SHR/RES/20221/III/001, approved the appointment of Bagus Harimawan as a Director of the Bank. This appointment has obtained the approval of OJK thereby adding to the composition of the Board of Directors with a majority of Indonesian nationals, as follows:

President Director	:	Lauren Sulistiawati
Director	:	Ming Hong Chen
Director	:	Timothy Christopher Delahunty
Director	:	Bagus Harimawan
Director of Compliance	:	Yessika Effendi

All members of the Board of Directors have met the requirements of integrity, competence and financial reputation as well as obtaining approval from OJK. The Board of Directors has implemented its duties and responsibilities as stipulated in the Articles of Associations and Board Charter. Members of the Board of Directors do not hold concurrent positions as stated in the Conflict Management and Outside Business Interest statement.

2. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris

Jumlah anggota Dewan Komisaris terdiri dari 4 (empat) Komisaris dengan komposisi 50% adalah Komisaris Independen dan jumlah anggota Dewan Komisaris tidak melebihi dari jumlah anggota Direksi. Dewan Komisaris telah melaksanakan tugas dan tanggung jawabnya sebagaimana yang diatur dalam peraturan dan charter Dewan Komisaris. Dewan Komisaris melaksanakan fungsi pengawasan secara independen dan tidak diperkenankan terlibat dalam pengambilan keputusan kegiatan operasional Bank.

3. Kelengkapan dan pelaksanaan tugas Komite

Bank memiliki komite-komite yang mendukung pelaksanaan tugas dan tanggung jawab Dewan Komisaris yaitu Komite Audit, Komite Pemantau Risiko serta Komite Remunerasi dan Nominasi. Struktur dan komposisi keanggotaan komite telah sesuai dengan peraturan yang didukung dengan charter komite sebagai acuan dalam melaksanakan tugas dan tanggung jawab komite. Seluruh komite di bawah Dewan Komisaris telah melaksanakan tugasnya sesuai dengan peraturan.

4. Penanganan Benturan Kepentingan

Bank memiliki Kebijakan dan Prosedur Manajemen Konflik serta Prosedur untuk Kepentingan Usaha di luar Bank yang berlaku bagi seluruh karyawan, Direksi, dan Dewan Komisaris. Seluruh karyawan Bank serta anggota Direksi dan Dewan Komisaris wajib mengungkapkan dalam hal terdapat potensi maupun terjadinya benturan kepentingan aktual. Bank juga mewajibkan seluruh karyawan, anggota Direksi, dan anggota Dewan Komisaris untuk secara berkala menandatangani pernyataan benturan kepentingan.

5. Penerapan Fungsi Kepatuhan Bank

Bank memiliki Satuan Kerja Kepatuhan yang independen terhadap unit kerja operasional dan Satuan Kerja Kepatuhan bertanggung jawab langsung kepada Direktur Kepatuhan. Pengangkatan Direktur Kepatuhan telah sesuai dengan ketentuan yang berlaku dan Direktur Kepatuhan tidak membawahi unit kerja operasional atau fungsi-fungsi yang tidak diperkenankan peraturan.

Fungsi kepatuhan Bank telah dilaksanakan dengan memadai antara lain melalui pelaksanaan kajian kepatuhan produk/layanan/kebijakan/prosedur, pemantauan regulatory parameter dan komitmen kepada regulator serta pelaksanaan assurance kepatuhan.

2. Implementation of the Board of Commissioners duties and responsibilities

The Board of Commissioners consists of 4 (four) commissioners, 50% of which are Independent Commissioners and the total number of the Board of Commissioners does not exceed the total number of the Board of Directors. The Board of Commissioners has implemented its duties and responsibilities as stipulated in the Board Charter. The Board of Commissioners performs oversight functions independently and is not allowed to be involved in the decision making of the Bank's operational activities.

3. Completeness and implementation of Committee duties

The Bank has committees to support the implementation of the Board of Commissioners' duties and responsibilities, including the Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee. The structure and composition of each Committee is in compliance with regulations, supported with Committee Charter as reference in implementing their duties and responsibilities. All committees under the Board of Commissioners have performed their duties according to regulations.

4. Conflict of Interests Handling

The Bank has Conflict Management Policies and Procedures as well as Outside Business Interest Procedures that apply to all employees, the Board of Directors and the Board of Commissioners. All Bank employees and members of the Board of Directors and Board of Commissioners must disclose any potential and actual conflicts of interest. The Bank also requires all employees, members of the Board of Directors and members of the Board of Commissioners to periodically sign a Conflict of Interest statement.

5. Implementation of Bank Compliance Function

The Bank has a Compliance Work Unit that is independent of the operational work unit and directly reports to the Director of Compliance. The appointment of the Director of Compliance is in accordance with prevailing regulations and the Director of Compliance does not supervise operational work units or other functions prohibited by the regulations.

The Bank's compliance functions have been implemented adequately including through reviewing the compliance of products / services / policies / procedures, monitoring regulatory parameters and maintaining commitments to regulators, as well as the implementation of compliance assurance activities.

6. Pelaksanaan Fungsi Audit Internal.

Bank memiliki Satuan Kerja Audit Internal (SKAI) yang independen dan Kepala Satuan Kerja Audit Internal bertanggung jawab langsung kepada Presiden Direktur. Setiap tahun, staf SKAI menandatangani Sertifikat Independensi (*Certificate of Independence*) yang menyatakan bahwa Internal Auditor tidak diperkenankan merangkap tugas dalam melaksanakan setiap kegiatan operasional Bank.

SKAI menyusun Rencana Kerja Audit dengan pendekatan berbasis risiko yang mencakup seluruh unit kerja Bank. SKAI memantau rencana perbaikan atas hasil audit secara berkala dan melakukan validasi penyelesaian perbaikan tersebut melalui *Issue Validation Review*. Direksi memastikan tindaklanjut hasil audit telah dilakukan oleh unit kerja terkait termasuk menindaklanjuti arahan atau rekomendasi Dewan Komisaris melalui Komite Audit.

7. Pelaksanaan Fungsi Audit Eksternal

Bank memiliki kebijakan dan prosedur penunjukan Akuntan Publik/Kantor Akuntan Publik sebagai Auditor Eksternal Bank. Penunjukan Akuntan Publik/Kantor Akuntan Publik dilaksanakan sesuai dengan Peraturan OJK dan kebijakan internal.

Bank menunjuk Akuntan Publik Drs. M. Jusuf Wibisana, M.Ed., CPA, dari Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan (anggota jaringan PricewaterhouseCoopers) sebagai auditor eksternal untuk tahun buku yang berakhir pada tanggal 31 Desember 2021 berdasarkan keputusan Rapat Umum Pemegang Saham Tahunan tanggal 30 Juni 2021.

8. Penerapan Manajemen Risiko termasuk Sistem Pengendalian Internal.

Bank memiliki struktur organisasi dan kebijakan serta prosedur yang mendukung pelaksanaan manajemen risiko. Satuan Kerja Manajemen Risiko merupakan satuan kerja lini 2 yang independen. Kepala Satuan Kerja Manajemen Risiko bertanggung jawab langsung kepada Presiden Direktur.

Penyusunan, penetapan dan pengkinian prosedur dan alat untuk mengidentifikasi, mengukur, memonitor dan mengendalikan risiko telah dilaksanakan dengan memadai. Direksi dan Dewan Komisaris melakukan pengawasan aktif terhadap pelaksanaan strategi dan kebijakan manajemen risiko melalui Komite Manajemen Risiko dan Komite Pemantau Risiko.

6. Implementation of Bank Internal Audit Function

The Bank has an Internal Audit Work Unit (SKAI) that is independent, and the Head of the Internal Audit Work Unit directly reports to the President Director. Each year, SKAI staff sign a Certificate of Independence stating that the Internal Auditor is not allowed to hold concurrent positions in executing any of the Bank's operational activities.

SKAI compiles an Audit Work Plan with a risk-based approach that covers each of the Bank's work units. SKAI periodically monitors all improvement plans based on audit results and validates the resolution of said improvements through Issue Validation Reviews. The Board of Directors ensures the follow up of audit results has been done by related work units including following up on the directions or recommendations from the Board of Commissioners through the Audit Committee.

7. Implementation of External Audit Function

The Bank has a policy and procedure in appointing a Public Accountant/Public Accountant Office as the Bank's External Auditor. The appointment of a Public Accountant/Public Accountant Office is done in accordance with OJK Regulations and internal policy.

The Bank appointed Public Accountant Drs. M. Jusuf Wibisana, M.Ed., CPA, of Public Accounting Firm Tanudiredja, Wibisana, Rintis & Rekan (a member of PricewaterhouseCoopers global network) as external auditor for the financial year ending on 31 December 2021 based on the decisions of the General Meeting of Shareholders on 30 June 2021.

8. Implementation of Risk Management, including Internal Management System

The Bank has an organisational structure and policies as well as procedures that supports the implementation of risk management. Risk Management Work Unit is an independent line 2 work unit. The Head of Risk Management Work Unit directly reports to the President Director.

The preparation, establishment and updating of procedures and tools to identify, measure, monitor and control risks have been carried out adequately. The Board of Directors and the Board of Commissioners have actively monitored the implementation of the Bank's Risk Management strategy and policy through the Risk Management Committee and Risk Monitoring Committee.

9. Penyediaan dana ke pihak terkait dan penyediaan dana besar

Bank memiliki Kebijakan Batas Maksimum Pemberian Kredit (BMPK) dan Penyediaan Dana Besar, termasuk prosedur sebagai acuan mengenai penyaluran dana kepada pihak terkait, non pihak terkait Bank. Bank tidak memiliki eksposure penyediaan dana besar (*large exposure*) sejalan dengan strategi Bank yang fokus pada segmen retail. Bank senantiasa mempertimbangkan kondisi permodalan dalam memberikan kredit maupun penyediaan dana lainnya. Pemberian kredit kepada pihak terkait dilakukan secara *arm's length* mengikuti persyaratan komersial normal sesuai dengan kebijakan kredit dan delegasi kewenangan kredit yang berlaku.

10. Transparansi kondisi keuangan dan non keuangan, laporan pelaksanaan GCG, dan pelaporan internal

Transparansi kondisi keuangan dan non keuangan Bank Commonwealth telah dilaksanakan secara memadai. Informasi keuangan dan non keuangan dipublikasi melalui situs web Bank termasuk Laporan keuangan publikasi triwulan dan laporan tahunan dan surat kabar Bank sebagai emiten juga mempublikasikan laporan-laporan sebagaimana yang diwajibkan OJK pasar modal pada situs web IDX.

Bank memiliki kebijakan terkait kewajiban transparansi dan pengungkapan baik kondisi keuangan dan non keuangan yang mengacu pada peraturan OJK dan mempertimbangkan *best practice* yang berlaku umum.

Bank memiliki sistem informasi manajemen yang mendukung sistem pelaporan internal Bank sehingga dapat dibuat dengan lengkap, akurat dan tepat waktu sesuai peraturan yang berlaku. Bank juga senantiasa melakukan pemeliharaan sistem secara berkala, pengembangan dan pembaruan untuk memastikan ketersediaan dan kehandalan dari sistem pelaporan.

11. Rencana Strategis Bank

Proses perencanaan strategis Bank senantiasa mempertimbangkan potensi pertumbuhan pasar, tujuan dan fokus Bank, serta strategi Bank. Perencanaan strategis didukung oleh pemegang saham pengendali. Direksi telah menyusun Rencana Bisnis Bank tahun 2022 – 2024 yang telah disetujui oleh Dewan Komisaris. Rencana strategis bank dikomunikasikan oleh Direksi kepada seluruh karyawan melalui media komunikasi internal. Dewan Komisaris melakukan pengawasan terhadap realisasi rencana bisnis Bank dan menyampaikan hasil pengawasannya kepada Otoritas Jasa Keuangan sesuai ketentuan. Pemegang saham memiliki komitmen untuk mendukung rencana strategis Bank, dan memantau keperluan modal guna menunjang strategi Bank.

9. Provision of fund to related party and provision of large exposure

The Bank has a Legal Lending Limit (LLL) Policy and Provisions of Large Exposures including procedures as a reference in the disbursement of funds to related and non-related parties. The Bank does not have large exposures in line with the Bank's strategy to focus on the retail segment. The Bank continuously considers capital conditions in providing credit as well as other fund provisions. Providing credit to related parties is done at arm's length in compliance with normal commercial regulations according to the prevailing credit regulations and credit authority delegations.

10. Transparency of financial and non-financial performance, GCG implementation and internal reports

Transparency in disclosing the Bank's financial and non-financial performance has been done adequately. Financial and non-financial information is published through the Bank's website including quarterly financial reports, the Annual Report, and the Bank's newsletters. As an Issuing Entity it also publishes reports as required by OJK Capital Markets through the IDX (and made available on the IDX website).

The bank has a policy regarding obligations for transparency and disclosure for its financial and non-financial performance with reference to OJK regulations and taking best practices into consideration.

The Bank has a management information system that supports its internal reporting system so it can be compiled comprehensively, accurately, and in a timely manner according to applicable regulations. The Bank also conducts periodic maintenance and updates to reporting systems to maintain availability and reliability of reporting.

11. Bank Strategic Plan

The Bank's strategic planning has always taken into consideration potential market growth, the Bank's purpose and focus, as well as its strategies. Strategic planning is supported by the controlling shareholder. The Board of Directors has prepared a Bank Business Plan for 2022 – 2024 which has been approved by the Board of Commissioners. The Bank's strategic plan is communicated by the Board of Directors to all employees through internal communications. The Board of Commissioners performs oversight to ensure the realisation of the Bank's business plans, as well as ensuring that the results of the Board of Commissioners' oversight on the Bank's performance is reported to OJK as required. Shareholders have a commitment to support the Bank's strategic plans and oversee capital needs in order to support the execution of its strategy.

Rapat Umum Pemegang Saham

General Meeting of Shareholders

Sebagai organ tertinggi dalam struktur tata kelola perusahaan, Rapat Umum Pemegang Saham (RUPS) merupakan wadah pemegang saham dalam pengambilan keputusan sebagaimana ditetapkan dalam peraturan perundang-undangan dan Anggaran Dasar Bank.

Sesuai dengan ketentuan Undang-Undang (UU) No.40 tahun 2007 tentang Perseroan Terbatas, RUPS terdiri dari RUPS Tahunan (RUPST) yang diselenggarakan satu kali dalam setahun dan RUPS Luar Biasa (RUPSLB) ketika kepentingan Bank membutuhkannya.

Pada 2021, Bank menyelenggarakan 1 (satu) RUPST dan 2 (dua) RUPSLB, yang menghasilkan keputusan-keputusan berikut:

RUPS Tahunan

2021

Tanggal Date	Nomor Keputusan Decree Number
30 Juni 2021 30 June 2021	No. SHR/RES/2021/VI/003
Ringkasan Keputusan Summary of Resolution	

1. Menyetujui Laporan Tahunan dan mengesahkan Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2020;
 Approved the Annual Report and ratified the Financial Statements of the Company for the year ended 31 December 2020;
2. Memberikan pembebasan dan pelunasan secara penuh kepada Direksi dan Dewan Komisaris atas pelaksanaan tugas dan tanggung jawabnya dalam pengurusan dan pengawasan Perseroan yang dilakukan dalam tahun buku tersebut sepanjang tindakan-tindakan tersebut tercermin dalam Laporan Tahunan dan Laporan Keuangan Perseroan;
 Granted full release and discharge to the Board of Directors and the Board of Commissioners from their duties and responsibilities for their actions in the management and supervision of the Company taken during that financial year to the extent that such actions are reflected in the Company's Annual Report and Financial Statements;
3. Memberikan kewenangan kepada Dewan Komisaris untuk menunjuk dan/atau mengganti auditor independen untuk mengaudit Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2021 dan untuk menentukan syarat-syarat dan ketentuan-ketentuan penunjukan tersebut dengan wajib memerhatikan rekomendasi dari Komite Audit Perseroan.
 Authorised the Board of Commissioners to appoint and/or change independent auditor to audit the Company's Financial Statement for the year ended 31 December 2021 and to determine the terms and conditions of the engagement with due regard to the recommendations from the Company's Audit Committee.

As the most senior body of the corporate governance structure, the General Meeting of Shareholders (GMS) is a platform for shareholders to make decisions as stipulated in applicable laws and regulations and the Bank's Articles of Association.

In accordance with the provisions of Legislation No. 40 of 2007 on Limited Liability Companies, the GMS consists of the Annual GMS (AGMS), held once a year and the Extraordinary GMS (EGMS), held when the interests of the Bank require it.

In 2021, the Bank held 1 (one) AGMS and 2 (two) EGMS with the following resolutions:

Annual GMS

2020

Tanggal Date	Nomor Keputusan Decree Number
29 Juni 2020 29 June 2020	SHR/RES/2020/VI/008
Ringkasan Keputusan Summary of Resolution	
1. Menyetujui Laporan Tahunan Perseroan dan mengesahkan Laporan Keuangan Perseroan untuk tahun yang berakhir pada tanggal 31 Desember 2019. Approved the Company's Annual Report and ratified the Company's Financial Statements for the year ending on 31 December 2019.	
2. Menyetujui penggunaan laba bersih Perseroan untuk tahun buku yang berakhir pada 31 Desember 2019 sebesar Rp16.553.066.967 (enam belas miliar lima ratus lima puluh tiga juta enam puluh enam ribu sembilan ratus enam puluh tujuh rupiah) akan dibukukan sebagai laba yang ditahan untuk memperkuat struktur permodalan Perseroan. Approved the use of the Company's net profit for the financial year ending on 31 December 2019 of Rp16,553,066,967 (sixteen billion five hundred fifty three million sixty six thousand nine hundred sixty seven rupiah) will be recorded as retained earnings to strengthen the Company's capital structure.	
3. Memberikan pembebasan dan pelunasan secara penuh kepada Dewan Direksi dan Dewan Komisaris atas pelaksanaan tugas dan tanggungjawabnya dalam pengurusan dan pengawasan Perseroan yang dilakukan dalam tahun buku tersebut sepanjang tindakan-tindakan tersebut tercermin dalam Laporan Tahunan dan Laporan Keuangan Perseroan. Providing full release and discharge to the Board of Directors and the Board of Commissioners for the implementation of their duties and responsibilities in the management and supervision of the Company during the financial year as long as these actions are reflected in the Company's Annual Report and Financial Statement.	
4. Memberikan kewenangan kepada Dewan Komisaris untuk menunjuk dan/atau mengganti auditor independen untuk mengaudit Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2020 dan untuk menentukan syarat-syarat dan ketentuan-ketentuan penunjukan tersebut dengan wajib memerhatikan rekomendasi dari Komite Audit Perseroan. To grant the authority to the Board of Commissioners to appoint and/or replace independent auditors to audit the Company's Financial Statements for the financial year ending on 31 December 2020 and to determine the terms and conditions of the appointment by taking into consideration the recommendations of the Company's Audit Committee.	

RUPS Luar Biasa

Extraordinary GMS

2021

No	Tanggal Date	Nomor Keputusan Decree Number																	
1.	24 Maret 2021 24 March 2021	No. SHR/RES/2021/VI/003																	
Ringkasan Keputusan Summary of Resolution																			
1. Menyetujui pengangkatan Bagus Harimawan sebagai Direktur Perseroan, yang akan berlaku efektif sejak memperoleh persetujuan dari Otoritas Jasa Keuangan. Approved the appointment of Bagus Harimawan as Director of the Company, which will be effective upon obtaining approval from Otoritas Jasa Keuangan (OJK).																			
2. Sejak berlaku efektifnya pengangkatan di atas, komposisi Dewan Komisaris dan Direksi Perseroan menjadi sebagai berikut: Upon the effectiveness of the above appointment, the composition of the Board of Commissioners and the Board of Directors of the Company shall be as follows:																			
<table> <tbody> <tr> <td>Presiden Komisaris President Commissioner</td> <td>: David Antony Keith Cohen</td> </tr> <tr> <td>Wakil Presiden Komisaris Vice President Commissioner</td> <td>: Stephen Vile*</td> </tr> <tr> <td>Komisaris Independen Independent Commissioner</td> <td>: Suwartini</td> </tr> <tr> <td>Komisaris Independen Independent Commissioner</td> <td>: Khairil Anwar</td> </tr> <tr> <td>Presiden Direktur President Director</td> <td>: Lauren Sulistiawati</td> </tr> <tr> <td>Direktur Director</td> <td>: Ming Hong Chen</td> </tr> <tr> <td>Direktur Director</td> <td>: Timothy Christopher Delahunty</td> </tr> <tr> <td>Direktur Director</td> <td>: Bagus Harimawan</td> </tr> <tr> <td>Direktur Kepatuhan Director of Compliance</td> <td>: Yessika Effendi</td> </tr> </tbody> </table>		Presiden Komisaris President Commissioner	: David Antony Keith Cohen	Wakil Presiden Komisaris Vice President Commissioner	: Stephen Vile*	Komisaris Independen Independent Commissioner	: Suwartini	Komisaris Independen Independent Commissioner	: Khairil Anwar	Presiden Direktur President Director	: Lauren Sulistiawati	Direktur Director	: Ming Hong Chen	Direktur Director	: Timothy Christopher Delahunty	Direktur Director	: Bagus Harimawan	Direktur Kepatuhan Director of Compliance	: Yessika Effendi
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* Stephen Vile telah berakhir masa jabatannya efektif per tanggal 26 Februari 2022.

Effective 26 February 2022, Stephen Vile no longer serves as Independent Commissioner.

No	Tanggal Date	Nomor Keputusan Decree Number
2.	30 September 2021 30 September 2021	No. SHR/RES/2021/VII/004

Ringkasan Keputusan
Summary of Resolution

1. Menyetujui pengangkatan kembali Ibu Suwartini sebagai Komisaris Independen Perseroan untuk jangka waktu sebagaimana diatur dalam Anggaran Dasar Perseroan dan berdasarkan tinjauan kinerja tahunan dengan hasil yang memuaskan tanpa mengurangi hak dari Rapat Umum Pemegang Saham untuk memberhentikan sewaktu-waktu.
Approved the reappointment of Mrs. Suwartini as Independent Commissioner of the Company, for the period as stipulated in the Articles of Association of the Company and subject to satisfactory result of annual performance review without prejudice to the rights of General Meeting of Shareholders to dismiss at any time.

2. Dengan adanya pengangkatan kembali di atas, komposisi Dewan Komisaris dan Direksi Perseroan menjadi sebagai berikut:
Upon the above reappointment, the composition of the Board of Commissioners and the Board of Directors of the Company shall be as follows:

Presiden Komisaris President Commissioner	:	David Antony Keith Cohen
Wakil Presiden Komisaris Vice President Commissioner	:	Stephen Vile*
Komisaris Independen Independent Commissioner	:	Suwartini
Komisaris Independen Independent Commissioner	:	Khairil Anwar
Presiden Direktur President Director	:	Lauren Sulistiawati
Direktur Director	:	Ming Hong Chen
Direktur Director	:	Timothy Christopher Delahunty
Direktur Director	:	Bagus Harimawan
Direktur Kepatuhan Director of Compliance	:	Yessika Effendi

* Stephen Vile telah berakhir masa jabatannya efektif per tanggal 26 Februari 2022.
Effective 26 February 2022, Stephen Vile no longer serves as Independent Commissioner.

2020

No	Tanggal Date	Nomor Keputusan Decree Number
1	16 Januari 2020 16 January 2020	SHR/RES/2020/I/001

Ringkasan Keputusan
Summary of Resolution

Menyetujui pengunduran diri Rajeev Bhatnagar sebagai Direktur Perseroan efektif sejak 17 Januari 2020. Komposisi Dewan Komisaris dan Dewan Direksi Perseroan menjadi sebagai berikut:
Approved the resignation of Rajeev Bhatnagar as Director of the Company effective on 17 January 2020. The composition of the Board of Commissioners and the Board of Directors of the Company is as follows:

Presiden Komisaris President Commissioner	:	David Antony Keith Cohen
Wakil Presiden Komisaris Vice President Commissioner	:	Stephen Vile
Komisaris Independen Independent Commissioner	:	Suwartini
Komisaris Independen Independent Commissioner	:	Khairil Anwar
Presiden Direktur President Director	:	Lauren Sulistiawati
Direktur Director	:	Ida Apulia Simatupang
Direktur Director	:	Tjioe Mei Tjuen
Direktur Director	:	Rustini Dewi
Direktur Kepatuhan Director of Compliance	:	Thio Sucy

2 11 Maret 2020 SHR/RES/2020/III/003
11 March 2020

Ringkasan Keputusan
Summary of Resolution

Menyetujui pengunduran diri Tjioe Mei Tjuen sebagai Direktur Perseroan efektif sejak 12 Maret 2020.
Approved the resignation of Tjioe Mei Tjuen as Director of the Company effective on 12 March 2020.

Komposisi Dewan Komisaris dan Dewan Direksi Perseroan menjadi sebagai berikut:
The composition of the Board of Commissioners and the Board of Directors of the Company is as follows:

Presiden Komisaris President Commissioner	:	David Antony Keith Cohen
Wakil Presiden Komisaris Vice President Commissioner	:	Stephen Vile
Komisaris Independen Independent Commissioner	:	Suwartini
Komisaris Independen Independent Commissioner	:	Khairil Anwar
Presiden Direktur President Director	:	Lauren Sulistiawati
Direktur Director	:	Ida Apulia Simatupang
Direktur Director	:	Rustini Dewi
Direktur Kepatuhan Director of Compliance	:	Thio Sucy



Tata Kelola
Perusahaan

Good
Corporate
Governance

No	Tanggal Date	Nomor Keputusan Decree Number																											
3.	31 Maret 2020 31 March 2020	SHR/RES/2020/III/004																											
<p>Ringkasan Keputusan Summary of Resolution</p> <p>Menyetujui pengunduran diri Ida Apulia Simatupang sebagai Direktur Perseroan efektif sejak 31 Maret 2020. Approved the resignation of Ida Apulia Simatupang as Director of the Company effective on 31 March 2020.</p> <p>Komposisi Dewan Komisaris dan Dewan Direksi Perseroan menjadi sebagai berikut: The composition of the Board of Commissioners and the Board of Directors of the Company is as follows:</p> <table> <tr> <td>Presiden Komisaris President Commissioner</td><td>:</td><td>David Antony Keith Cohen</td></tr> <tr> <td>Wakil Presiden Komisaris Vice President Commissioner</td><td>:</td><td>Stephen Vile</td></tr> <tr> <td>Komisaris Independen Independent Commissioner</td><td>:</td><td>Suwartini</td></tr> <tr> <td>Komisaris Independen Independent Commissioner</td><td>:</td><td>Khairil Anwar</td></tr> <tr> <td>Direktur Utama President Director</td><td>:</td><td>Lauren Sulistiawati</td></tr> <tr> <td>Direktur Director</td><td>:</td><td>Rustini Dewi</td></tr> <tr> <td>Direktur Kepatuhan Director of Compliance</td><td>:</td><td>Thio Sucy</td></tr> </table>			Presiden Komisaris President Commissioner	:	David Antony Keith Cohen	Wakil Presiden Komisaris Vice President Commissioner	:	Stephen Vile	Komisaris Independen Independent Commissioner	:	Suwartini	Komisaris Independen Independent Commissioner	:	Khairil Anwar	Direktur Utama President Director	:	Lauren Sulistiawati	Direktur Director	:	Rustini Dewi	Direktur Kepatuhan Director of Compliance	:	Thio Sucy						
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4.	13 Mei 2020 13 May 2020	SHR/RES/2020/V/005																											
<p>Ringkasan Keputusan Summary of Resolution</p> <p>Menyetujui pengangkatan Ming Hong Chen sebagai Direktur Perseroan, terhitung efektif sejak diperolehnya persetujuan Otoritas Jasa Keuangan (OJK) dan Surat Izin Bekerja dari Instansi yang berwenang. Approved the appointment of Ming Hong Chen as Director of the Company, effective since the approval of the Financial Services Authority (OJK) and Work Permit from the relevant authorities.</p>																													
5.	29 Mei 2020 29 May 2020	SHR/RES/2020/V/005																											
<p>Ringkasan Keputusan Summary of Resolution</p> <p>Menyetujui amandemen Pasal 3 Anggaran Dasar Perseroan. Approve amendment to Article 3 of the Company's Articles of Association.</p>																													
6.	23 Juni 2020 23 June 2020	SHR/RES/2020/VI/006																											
<p>Ringkasan Keputusan Summary of Resolution</p> <p>Menyetujui amandemen Pasal 13 dan 16 dalam Anggaran Dasar Perseroan agar sesuai dengan Peraturan Otoritas Jasa Keuangan No. 33/POJK.04/2014 tentang Dewan Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik. Approved amendments to Articles 13 and 16 in the Company's Articles of Association to comply with the Financial Services Authority Regulation No. 33/ POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies.</p>																													
7.	29 Juni 2020 29 June 2020	SHR/RES/2020/VI/007																											
<p>Ringkasan Keputusan Summary of Resolution</p> <p>Menyetujui pengangkatan Timothy Christopher Delahunty sebagai Direktur Perseroan, terhitung efektif sejak diperolehnya persetujuan Otoritas Jasa Keuangan dan Surat Izin Bekerja dari Instansi yang berwenang. Approved the appointment of Timothy Christopher Delahunty as Director of the Company, effective since the approval of the Financial Services Authority and Work Permit from the relevant authorities.</p>																													
8.	22 Juli 2020 22 July 2020	SHR/RES/2020/VII/009																											
<p>Ringkasan Keputusan Summary of Resolution</p> <ul style="list-style-type: none"> a. Menyetujui pengunduran diri Thio Sucy sebagai Direktur Perseroan efektif sejak 23 Juli 2020. Approved the resignation of Thio Sucy as Director of the Company effective on 23 July 2020. b. Menyetujui pengangkatan Yessika Effendi sebagai Direktur Kepatuhan Perseroan, terhitung efektif sejak memperoleh persetujuan dari Otoritas Jasa Keuangan. Approved the appointment of Yessika Effendi as the Company's Compliance Director, effective on since approval from the Financial Services Authority. <p>Komposisi Dewan Komisaris dan Dewan Direksi Perseroan menjadi sebagai berikut: The composition of the Board of Commissioners and the Board of Directors of the Company is as follows:</p> <table> <tr> <td>Presiden Komisaris President Commissioner</td><td>:</td><td>David Antony Keith Cohen</td></tr> <tr> <td>Wakil Presiden Komisaris Vice President Commissioner</td><td>:</td><td>Stephen Vile</td></tr> <tr> <td>Komisaris Independen Independent Commissioner</td><td>:</td><td>Suwartini</td></tr> <tr> <td>Komisaris Independen Independent Commissioner</td><td>:</td><td>Khairil Anwar</td></tr> <tr> <td>Direktur Utama President Director</td><td>:</td><td>Lauren Sulistiawati</td></tr> <tr> <td>Direktur Director</td><td>:</td><td>Rustini Dewi</td></tr> <tr> <td>Direktur Director</td><td>:</td><td>Ming Hong Chen</td></tr> <tr> <td>Direktur Director</td><td>:</td><td>Timothy Christopher Delahunty</td></tr> <tr> <td>Direktur Kepatuhan Compliance Director</td><td>:</td><td>Yessika Effendi</td></tr> </table>			Presiden Komisaris President Commissioner	:	David Antony Keith Cohen	Wakil Presiden Komisaris Vice President Commissioner	:	Stephen Vile	Komisaris Independen Independent Commissioner	:	Suwartini	Komisaris Independen Independent Commissioner	:	Khairil Anwar	Direktur Utama President Director	:	Lauren Sulistiawati	Direktur Director	:	Rustini Dewi	Direktur Director	:	Ming Hong Chen	Direktur Director	:	Timothy Christopher Delahunty	Direktur Kepatuhan Compliance Director	:	Yessika Effendi
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Direktur Kepatuhan Compliance Director	:	Yessika Effendi																											

No	Tanggal Date	Nomor Keputusan Decree Number																								
9	25 November 2020 25 November 2020	SHR/RES/2020/XI/010																								
Ringkasan Keputusan Summary of Resolution																										
Menyetujui pengunduran diri Rustini Dewi sebagai Direktur Perseroan efektif sejak 1 Februari 2021. Approved the resignation of Rustini Dewi as Director of the Company effective on 1 February 2021.																										
Komposisi Dewan Komisaris dan Dewan Direksi Perseroan menjadi sebagai berikut: Composition of the Board of Commissioners and Directors is as follows:																										
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Dewan Komisaris

Board Of Commissioners

Dewan Komisaris merupakan organ tata kelola yang bertanggung jawab melakukan pengawasan dan memberi nasihat kepada Direksi. Dewan Komisaris tidak berwenang untuk terlibat dalam pengambilan keputusan yang berkaitan dengan kegiatan operasional Bank.

Pelaksanaan tugas Dewan Komisaris di Bank Commonwealth dengan mengacu pada UU No. 40 Tahun 2007 tentang Perseroan Terbatas, POJK No.55/POJK.03/2016 tentang Penerapan Tata Kelola Bagi Bank Umum dan SEOJK No.13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum, serta No. 33 /POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.

Tugas dan Tanggung Jawab Dewan Komisaris

Tugas, fungsi, dan tanggung jawab utama Dewan Komisaris adalah:

1. Memantau dan memastikan penerapan prinsip Tata Kelola Perusahaan yang Baik (GCG) pada semua aspek usaha Bank dan setiap jenjang organisasi.
2. Mengawasi secara aktif pelaksanaan tugas dan tanggung jawab Direksi memberikan rekomendasi dan usulan, serta memantau dan mengevaluasi kebijakan strategis Bank.
3. Menjaga dan memantau Tingkat Kesehatan Bank serta mengambil langkah-langkah yang diperlukan untuk memelihara dan/atau meningkatkan Tingkat Kesehatan Bank.

The Board of Commissioners is the governance body responsible for supervising and providing advice to the Board of Directors. The Board of Commissioners is not authorised to be involved in making decisions related to Bank's operational activities.

The implementation of the Board of Commissioners' duties at the Bank is held in accordance with the provisions of Legislation No.40 of 2007 on Limited Liability Companies, POJK No. 55/POJK.03/2016 on the Implementation of Good Corporate Governance for Commercial Banks and SEOJK No. 13/SEOJK.03/2017 on the Implementation of Good Corporate Governance for Commercial Banks and No.33/POJK.04/2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies.

Duties and Responsibilities of the Board of Commissioners

The main duties, functions and responsibilities of the Board of Commissioners are:

1. Monitor and ensure the implementation of Good Corporate Governance (GCG) principles in all aspects of the Bank's business and at all levels of the organisation.
2. Actively supervise the performance of the Board of Directors in carrying out all their duties and responsibilities, providing recommendations and suggestions, as well as monitoring and evaluating the implementation of the Bank's strategic policies.
3. Maintain and monitor the Bank's Soundness Level and take all the necessary steps to maintain and/or improve the Bank Soundness Level.

4. Memastikan Direksi telah menyusun dan memelihara sistem pengendalian internal yang memadai, efektif dan efisien, serta menindaklanjuti temuan audit dan rekomendasi dari Audit Internal Bank, Audit Eksternal, OJK, dan otoritas pengawas lainnya.
5. Mengkaji efektivitas dan efisiensi sistem pengendalian internal Bank paling sedikit sekali setahun berdasarkan informasi yang diperoleh dari SKAI.
6. Menunjuk penjaga kualitas independen dari luar untuk mengkaji ulang kinerja Satuan Kerja Audit Internal, dengan mempertimbangkan rekomendasi Komite Audit.
7. Mengkaji efektivitas dan efisiensi sistem pengendalian internal berdasarkan informasi yang diperoleh dari SKAI paling sedikit sekali setahun.

Piagam Dewan Komisaris

Piagam Dewan Komisaris atau *Board Manual* disusun sebagai pedoman pelaksanaan tugas dan tanggung jawab Dewan Komisaris. *Board Manual* berlaku mengikat bagi seluruh anggota Dewan Komisaris. Penyusunan *Board Manual* mengacu pada peraturan perundang-undangan, serta Anggaran Dasar Bank Commonwealth serta sesuai praktik-praktik terbaik di industri keuangan. Sebagaimana disyaratkan oleh peraturan, Bank mempublikasikan Piagam Dewan Komisaris di situs webnya.

Independensi Dewan Komisaris

Tidak ada anggota Dewan Komisaris yang memiliki hubungan keluarga dan hubungan keuangan dengan anggota Dewan Komisaris lain, Direksi maupun pemegang saham pengendali.

Tidak ada anggota Dewan Komisaris yang memiliki 5% atau lebih dari modal disetor pada Bank Commonwealth, bank lain, lembaga keuangan non-Bank, dan pada perusahaan lainnya baik di dalam maupun luar Indonesia.

Komisaris Independen tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya dan/atau dengan pemegang saham mayoritas, dan/atau hubungan lainnya dengan Bank yang dapat memengaruhi pengambilan keputusan dan tindakan secara independen.

Rangkap Jabatan

Anggota Dewan Komisaris Bank tidak merangkap jabatan yang tidak diperkenankan peraturan OJK sebagaimana yang dituangkan dalam tabel di bawah ini.

4. Ensure that the Board of Directors has established and maintained an adequate, effective and efficient internal control system, and followed up on audit findings and recommendations from the Bank Internal Audit, External Auditor, OJK, and other supervisory bodies.
5. Review the effectiveness and efficiency of the Bank's internal control system at least once a year based on information obtained from the Internal Audit function.
6. Appoint an independent quality controller from an external party to review the performance of the Internal Audit Unit, taking into account the recommendations of the Audit Committee
7. Review the effectiveness and efficiency of the internal control system based on information obtained from the Internal Audit Unit at least once a year.

Board of Commissioners Charter

The Board of Commissioners Charter or Board Manual is compiled as a set of guidelines for the implementation of the Board of Commissioners' duties and responsibilities. The Board Manual applies to all members of the Board. The compilation of the Board Manual refers to the legislations and regulations, as well as the Articles of Association of the Bank, according to best practices in the financial industry. As per regulatory requirements, the Bank publishes the Board of Commissioners Charter on the Bank's website.

Independence of the Board of Commissioners

No member of the Board of Commissioners has any familial or financial relationships with other members of the Board of Commissioners, Board of Directors, or controlling shareholders.

No member of the Board of Commissioners owns 5% or more of the paid-up capital in the Bank, other banks, non-bank financial institutions and other companies either in or outside of Indonesia.

Independent Commissioners do not have any financial, management, share ownership and/or familial relationship with other members of the Board of Commissioners and/or with majority shareholders, and/or other relationships with the Bank that can influence the independence of their decision making and actions.

Concurrent Positions

Members of the Bank's Board of Commissioners do not have any concurrent positions as prohibited by OJK regulations, as outlined in the following:

Nama Names	Jabatan Positions	Jabatan lain di luar PT Bank Commonwealth Other Positions outside of the Bank
David Cohen	Presiden Komisaris President Commissioner	<ul style="list-style-type: none"> Deputy Chief Executive Officer pada Commonwealth Bank of Australia (CBA) Deputy Chief Executive Officer of Commonwealth Bank of Australia (CBA) Director pada ASB Bank Limited Director of ASB Bank Limited Director pada Superannuation and Investments Holdco Pty Limited Director of Superannuation and Investments Holdco Pty Limited
Stephen Vile*	Wakil Presiden Komisaris Vice President Commissioner	-
Suwartini	Komisaris Independen Independent Commissioner	-
Khairil Anwar	Komisaris Independen Independent Commissioner	Advisor pada KoinWorks Advisor at KoinWorks

* Stephen Vile telah berakhir masa jabatannya efektif per tanggal 26 Februari 2022.
Effective 26 February 2022, Stephen Vile no longer serves as Independent Commissioner.

Penilaian Kemampuan dan Kepatutan

Semua anggota Dewan Komisaris telah lulus Penilaian Kemampuan dan Kepatutan, serta mendapat persetujuan OJK.

Rapat Dewan Komisaris

Dewan Komisaris menyelenggarakan rapat sesuai dengan ketentuan dan pedoman Dewan Komisaris, dengan agenda yang disusun dengan baik dan risalah rapat.

Pada 2021, Dewan Komisaris telah mengadakan 6 (enam) kali rapat melalui teleconference dengan daftar kehadiran masing-masing anggota Dewan Komisaris sebagai berikut:

No	Anggota Member	Jabatan Title	Jumlah Kehadiran Total Attendance	Percentase Kehadiran Attendance Percentage
1	David Cohen	Presiden Komisaris President Commissioner	6/6	100%
2	Stephen Vile*	Wakil Presiden Komisaris Vice President Commissioner	6/6	100%
3	Suwartini	Komisaris Independen Independent Commissioner	6/6	100%
4	Khairil Anwar	Komisaris Independen Independent Commissioner	6/6	100%

* Stephen Vile telah berakhir masa jabatannya efektif per tanggal 26 Februari 2022.
Effective 26 February 2022, Stephen Vile no longer serves as Independent Commissioner

Program Pelatihan dan Pengembangan Kompetensi Dewan Komisaris

Bank memberikan kesempatan dan fasilitas bagi anggota Dewan Komisaris untuk mengikuti pelatihan dan pengembangan kompetensinya. Anggota Dewan Komisaris mengikuti pelatihan dan seminar yang diselenggarakan oleh Bank maupun eksternal Bank.

Selama 2021, anggota Dewan Komisaris telah mengikuti program-program pelatihan/seminar sebagai berikut:

Fit and Proper Test

All members of the Board of Commissioners have passed the Fit and Proper Test and received approval from OJK.

Board of Commissioners Meetings

The Board of Commissioners holds meetings in accordance with the provisions and guidelines of the Board of Commissioners with agendas that are well-documented and minutes recorded.

In 2021, the Board of Commissioners held 6 (six) meetings via teleconference with the attendance of each member of the Board of Commissioners as follows:

Trainings and Competency Development Programs for the Board of Commissioners

The Bank provided several opportunities and facilities for members of the Board of Commissioners to participate in training sessions and develop their competence. The members of the Board of Commissioners participated in training sessions and seminars held by the Bank as well as external parties.

In 2021, members of the Board of Commissioners that have participated in training/seminars/workshops are as follows:

Nama Names	Training/Seminar Workshop/E-Learning
David Cohen	<ul style="list-style-type: none"> • Responsible Persons & Responsible Manager Learning, • Fraud, • The Group Risk Management Approach, • Management of Whistleblower Disclosure
Stephen Ville*	<p>Environmental and Social Risk, Bank Executive Accountability Regime, Anti-Money Laundering and Sanctions, Commonwealth Bank Risk Management Approach.</p>
Suwartini	<ul style="list-style-type: none"> • Akselerasi Digitalisasi UMKM Dalam Rangka Pemulihan Ekonomi Sebagai Dampak Pandemi COVID 19, Acceleration of the Digitisation of MSMEs in the Context of Economic Recovery as an Impact of the COVID-19 Pandemic • Meningkatkan Inklusi Keuangan Masyarakat Indonesia, Improving Financial Inclusion for Indonesians • Rencana Pengaturan Perlindungan Data Pribadi Sebagai Penyeimbang Pesatnya Perkembangan Teknologi Digital di Sektor Jasa Keuangan, Personal Data Protection Arrangement Plan to Balance the Rapid Development of Digital Technology in the Financial Services Sector • Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif, Governance dan Stabilitas Sistem Keuangan, Making the Financial Services Industry Adaptive and Anticipatory, Governance and Financial System Stability • Peningkatan Daya Saing Kewirausahaan UMKM Untuk Menembus Pasar Regional dan Global, Pendanaan Hijau dan Pemulihan Ekonomi Nasional, Enhancing SME Entrepreneurship Competitiveness to Penetrate Regional and Global Markets, Green Funding and National Economic Recovery • CEO Forum "The Future of Banking - How Bank Stay Relevant" • Training internal Director Group Mandatory Learning
Khairil Anwar	<ul style="list-style-type: none"> • Pentingnya Perlindungan Konsumen Sektor Jasa Keuangan, "Kemana Kita Mengadu?" The Importance of Consumer Protection in the Financial Services Sector, "Where Do We Complain?" • Transformasi Perbankan di Era Digital, Banking Transformation in the Digital Age, • Launching of Blueprint for Digital Banking Transformation • Akselerasi Digitalisasi UMKM Dalam Rangka Pemulihan Ekonomi Sebagai Dampak Pandemi COVID 19, Acceleration of the Digitisation of MSMEs in the Context of Economic Recovery as an Impact of the COVID-19 Pandemic • Presidensi G20 – Manfaat Bagi Indonesia dan Dunia G20 Presidency – Benefits for Indonesia and the World • Training Internal Director Group Mandatory Learning Director Group Mandatory Learning internal training

* Stephen Vile telah berakhir masa jabatannya efektif per tanggal 26 Februari 2022

Effective 26 February 2022, Stephen Vile no longer serves as Independent Commissioner

Pengawasan dan Rekomendasi Dewan Komisaris

Dewan Komisaris bertanggung jawab menjalankan fungsi pengawasan melalui pemenuhan tugas-tugas berikut:

1. Memberikan rekomendasi tentang penyesuaian strategi bisnis apabila diperlukan dan mengawasi tingkat pertumbuhan kredit dan pendanaan.
2. Mengevaluasi kinerja keuangan Bank sepanjang 2021.
3. Mengevaluasi pelaksanaan Rencana Bisnis Bank.
4. Memantau dan mengevaluasi perkembangan bisnis/proyek yang sedang dikembangkan Bank, terutama proyek-proyek terkait pengembangan strategi digital Bank.

Supervision and Recommendation of the Board of Commissioners

The Board of Commissioners is responsible for carrying out its supervisory function through the fulfilment of the following tasks:

1. Provide recommendations regarding the adjustments of business strategies where necessary and overseeing credit growth and function rates.
2. Evaluate the Bank's financial performance throughout the financial year.
3. Evaluate the implementation of the Bank's Business Plan.
4. Monitor and evaluate the development of businesses/projects developed by the Bank, in particular projects related to the execution of the Bank's digital transformation strategy.

5. Memantau, mengkaji dan mengevaluasi tindakan yang disetujui dari hasil temuan audit internal dan eksternal, serta memantau perbaikan terhadap temuan audit baik yang berasal dari audit internal, audit eksternal, maupun audit regulator.
6. Membahas Laporan Tingkat Kesehatan Bank, Laporan Triwulan Profil Risiko, dan dampak dari peraturan baru atau perubahan peraturan bagi Bank.
7. Memantau area-area risiko operasional utama, terutama terkait keamanan siber, teknologi informasi, kejahatan finansial, dan penyedia jasa pihak ketiga.
8. Mengevaluasi dan perkembangan terkait kegiatan operasional dan perubahan strategi Bank.

Rekomendasi dan persetujuan dari Dewan Komisaris pada 2021 adalah:

1. Evaluasi kinerja keuangan Bank.
2. Hasil temuan audit internal dan eksternal serta memonitor perbaikan terhadap temuan audit baik yang berasal dari Audit Internal, audit eksternal dan audit regulator (OJK).
3. Kinerja Bisnis dan laporan keuangan Bank.
4. Laporan Tingkat Kesehatan Bank, Laporan Profil Risiko triwulan.
5. Dampak dari peraturan baru atau perubahan peraturan bagi Bank.
6. Perkembangan ataupun proyek Bank, termasuk CommBank Mobile, Digital Lending, Process Improvement & Data Management.
7. Enam Prioritas Strategis guna menunjang pengembangan bisnis Bank.
8. Rencana Bisnis Bank tahun 2022-2024.
9. Penunjukan Auditor Eksternal untuk audit tahun buku 2021.
10. Kebijakan Penerapan Program Anti Pencucian Uang & Pencegahan Pendanaan Terorisme.
11. *Risk Appetite Statement.*
12. *Corporate Planning*
13. Rencana Penyelenggaraan Produk Bank

Penilaian Direksi dan Dewan Komisaris

Prosedur Penilaian Kinerja Direksi

Penilaian Kinerja Direksi dilakukan dua kali setahun berdasarkan Indikator Kinerja Utama (IKU) yang telah ditetapkan dan disetujui bersama, dengan memperhitungkan tugas dan tanggung jawab masing-masing anggota Direksi.

5. Monitor, review, and evaluate actions taken from internal, external and regulatory audit findings, as well as monitor improvements relating to audit findings.

6. Discuss the Bank's Soundness Level Reports, Risk Profile Quarterly Reports, and the impact of new regulations or changes to regulations on the Bank.
7. Monitor key operational risk areas, particularly those related to cyber security, information technology, financial crime and third party suppliers.
8. Evaluate developments related to operational activities and changes in the Bank's strategy.

The recommendations and approvals made by the Board of Commissioners in 2021 are:

1. Evaluating the Bank's financial performance.
2. Internal and external audit findings as well as monitoring improvements on audit findings from internal, external, and regulatory audits.
3. Business performance and the Bank's financial statement.
4. The Bank's Soundness Report, Quarterly Risk Profile Report.
5. Impact of new regulations or change of regulations for the Bank.
6. The Bank's development or projects, including CommBank Mobile, Digital Lending, Process Improvement & Data Management.
7. Strategic Priorities in support of the Bank's business growth and strategy execution.
8. The Bank's business plan for 2022-2024.
9. Appointment of an External Auditor to audit the 2021 Financial Year.
10. Policy on the Implementation of Anti-Money Laundering & Counter-Terrorism Financing Programs.
11. Bank Risk Appetite Statement.
12. Corporate Planning
13. Banking Product Implementation Plan

Assessment of the Board of Directors and the Board of Commissioners

Board of Directors Performance Assessment Procedure

The assessment of the Board of Directors Performance is carried out twice a year based on Key Performance Indicators (KPI) that have been set and mutually agreed upon, taking into account the duties and responsibilities of each member of the Board of Directors.

Penilaian kinerja Direksi dijalankan melalui:

- Penilaian Sendiri
- Penilaian oleh Komite Remunerasi dan Nominasi terhadap semua anggota Direksi dalam rapat Komite. Komite Remunerasi dan Nominasi kemudian akan memberikan rekomendasi kepada Dewan Komisaris.

Kriteria Penilaian Kinerja Direksi

Kriteria penilaian kinerja Direksi merujuk pada tiga komponen sebagai berikut:

- Pencapaian Bisnis

Penilaian dilakukan atas pencapaian kinerja dibandingkan dengan KPI yang sudah disetujui.
- Penilaian Perilaku

Penilaian perilaku merujuk kepada Nilai-nilai Bank, yaitu:

 - ▷ Kepedulian: Kami peduli terhadap nasabah dan satu sama lain – kami melayani dengan kerendahan hati dan keterbukaan.
 - ▷ Keberanian: Kami memiliki keberanian untuk maju, bersuara, dan memimpin dengan memberikan contoh.
 - ▷ Komitmen: Kami teguh dalam memegang komitmen kami – kami melakukan hal yang benar dan bekerja sama untuk menyelesaikan pekerjaan.
- Penilaian Risiko

Indikator penilaian risiko adalah:

 - ▷ Akuntabilitas setiap anggota Direksi terhadap Pengelolaan Risiko sesuai dengan peran masing-masing.
 - ▷ Kepatuhan terhadap kebijakan yang berlaku.
 - ▷ Penyelesaian Pelatihan Wajib.

Hasil Penilaian Direksi

Pada 2021, penilaian kinerja semua anggota Direksi menunjukkan hasil yang baik sesuai dengan kriteria yang ditentukan.

Penilaian Dewan Komisaris

Penilaian kinerja Dewan Komisaris dilakukan oleh pemegang saham dan diwakilkan oleh pemegang saham pengendali dengan mempertimbangkan kriteria-kriteria tugas dan tanggung jawab yang telah ditetapkan.

Hasil penilaian kinerja Dewan Komisaris akan menjadi pertimbangan RUPS dalam pengangkatan kembali anggota Dewan Komisaris. Beberapa komponen penilaian anggota Dewan Komisaris sebagai berikut:

The performance assessment of the Board of Directors is carried out through:

- Self-Assessment.
- Assessment by the Remuneration and Nomination Committee for all members of the Board of Directors during a Committee meeting. The Remuneration and Nomination Committee then provides recommendations to the Board of Commissioners.

Board of Directors Performance Assessment Criteria

The performance assessment criteria for the Board of Directors refer to the following three components:

- Business Outcomes

The assessment is done based on the performance achievement compared to the agreed KPI.
- Behavioural Assessment

Behavioural assessment is based on the Bank's Values, namely:

 - ▷ Care: We care for our customers and each other – We serve with humility and openness.
 - ▷ Courage: We have the courage to step in, speak up and lead by example.
 - ▷ Commitment: We stay true to our commitment – we do the right things and work together to finish the job.
- Risk Assessment

Indicators for Risk assessment are:

 - ▷ Accountability of every member of the Board of Directors in applying Risk Management in accordance to their respective role.
 - ▷ Compliance with applicable policies.
 - ▷ Completion of assigned Mandatory Learning.

Assessment Results of the Board of Directors

In 2021, the performance assessment resulted in satisfactory ratings for all members of the Board of Directors based on the performance assessment criteria.

Assessment of the Board of Commissioners

The assessment of the Board of Commissioners performance is conducted by shareholders, represented by the controlling shareholder, taking into consideration the criteria of roles and responsibilities that have been set.

The Board of Commissioners performance review will be taken into account by GMS during the re-appointment of a member of the Board of Commissioners. Some components for considerations are:

- Efektivitas pelaksanaan kinerja Komite Dewan Komisaris.
- Pengawasan pelaksanaan strategi Bank dan penerapan GCG.
- Penerapan Pengelolaan Risiko dan Pengendalian Internal untuk memitigasi risiko.

Berdasarkan kriteria-kriteria tersebut, penilaian terhadap kinerja Dewan Komisaris selama tahun 2021 adalah baik.

Penilaian terhadap Komite di bawah Dewan Komisaris

Sesuai yang disyaratkan peraturan, Dewan Komisaris mengadakan kuesioner internal tahunan untuk mengevaluasi kinerja Komite di bawah Dewan Komisaris, yaitu Komite Audit, Komite Pemantau Risiko, dan Komite Remunerasi dan Nominasi, pada empat (4) bidang utama: efektivitas, perilaku, proses dan pelaporan, serta peran dan tanggung jawab. Hasil evaluasi menunjukkan bahwa selama tahun 2021, seluruh Komite telah menjalankan fungsi dan tugas dengan baik dalam mendukung Dewan Komisaris.

Komposisi Dewan Komisaris

Keanggotaan Dewan Komisaris merujuk pada peraturan OJK, yang mensyaratkan bahwa jumlah Dewan Komisaris paling sedikit adalah 3 (tiga) orang dan tidak boleh lebih banyak dari jumlah anggota Direksi. Komposisi Komisaris Independen paling kurang 50% dari jumlah anggota Dewan Komisaris.

Komposisi Dewan Komisaris Bank terdiri dari 4 (empat) anggota sebagaimana tabel berikut ini:

- Effectiveness of performance execution of Committees under the Board of Commissioners.
- Supervision on the execution of the Bank's strategy and implementation of GCG.
- Implementation of Risk Management and internal controls to mitigate risks.

Based on the criteria specified above, the Board of Commissioners' performance for the year 2021 is Good.

Assessment on Committees Under the Board of Commissioners

As per regulatory requirements, the Board of Commissioners conducts an annual internal questionnaire to evaluate the performance of Committees under the Board, including the Audit Committee, the Risk Oversight Committee, and the Remuneration and Nomination Committee, on 4 (four) key areas: effectiveness, behaviour, processes and reporting, roles and responsibilities. For the year 2021, all Committees have been evaluated to have carried out their functions and duties effectively in supporting the Board of Commissioners.

Composition of the Board of Commissioners

The membership of the Board of Commissioners refers to OJK requirements which require the Board of Commissioners to consist of a minimum of 3 (three) persons and cannot be more than the number of members of the Board of Directors. The composition of Independent Commissioners shall be at least 50% of the total members of the Board of Commissioners.

The composition of the Bank's Board of Commissioners consists of 4 (four) members. The composition of the Board of Commissioners is described in the following table:

No	Nama Name	Jabatan Position	Tanggal Efektif Pengangkatan Berdasarkan Persetujuan OJK Effective Appointment Date Pursuant to OJK Approval	Periode Jabatan Term of Office
1	David Antony Keith Cohen	Presiden Komisaris President Commissioner	8 Maret 2019 8 March 2019	2019 – 2022
2	Stephen Vile*	Wakil Presiden Komisaris Vice President Commissioner	25 Februari 2019 25 February 2019	2019 – 2022
3	Suwartini	Komisaris Independen Independent Commissioner	7 November 2012 7 November 2012	2018 – 2021
4	Khairil Anwar	Komisaris Independen Independent Commissioner	6 Mei 2013 6 May 2013	2019 – 2022

* Stephen Vile telah berakhir masa jabatannya efektif per tanggal 26 Februari 2022.

Effective 26 February 2022, Stephen Vile no longer serves as Independent Commissioner.

Direksi

Board of Directors

Direksi bertanggung jawab atas pengelolaan kegiatan usaha Bank untuk kepentingan dan tujuan perusahaan sesuai dengan Anggaran Dasar Bank.

Pengangkatan anggota Direksi dilakukan oleh Rapat Umum Pemegang Saham (RUPS) dengan mempertimbangkan rekomendasi Komite Remunerasi dan Nominasi. Direksi mempertanggungjawabkan pelaksanaan tugasnya kepada RUPS.

Tugas dan Tanggung Jawab Direksi

Secara umum, tugas dan tanggung jawab Direksi meliputi:

1. Bertanggung jawab secara penuh terhadap aktivitas operasional manajemen Bank dan pengelolaan bisnisnya sesuai wewenang dan tanggung jawab yang ditetapkan dalam Anggaran Dasar serta peraturan dan perundang-undangan yang berlaku.
2. Menerapkan prinsip-prinsip tata kelola yang baik dalam semua aspek bisnis Bank dan di seluruh jenjang organisasi.
3. Mendiskusikan temuan dan rekomendasi audit dari Audit Internal, Audit Eksternal, dan audit OJK dan/ atau otoritas lain.
4. Mengembangkan dan memastikan pelaksanaan Manajemen Risiko di semua tingkatan organisasi Bank dan memastikan bahwa fungsi Manajemen Risiko berjalan secara independen.
5. Melaporkan tugas dan tanggung jawabnya kepada RUPS.

Piagam Direksi

Direksi memiliki Pedoman dan Tata Tertib (*Board Manual*) sebagai acuan dalam melaksanakan tugas dan tanggung jawabnya. *Board Manual* berlaku mengikat bagi seluruh anggota Direksi. Penyusunan *Board Manual* mengacu pada peraturan perundang-undangan, Anggaran Dasar Bank, dan praktik terbaik di industri keuangan.

Hubungan Keluarga dan Keuangan antara Direksi dan Dewan Komisaris

Tidak ada anggota Direksi dan Dewan Komisaris Bank yang memiliki hubungan keluarga maupun keuangan dengan anggota Direksi lainnya, anggota Dewan Komisaris, dan dengan pemegang saham pengendali.

The Board of Directors is responsible for managing the Bank's business activities for the interests and objectives of the company in accordance with the Bank's Articles of Association.

The appointment of members of the Board of Directors is done through the General Meeting of Shareholders (GMS) with the recommendation from the Remuneration and Nomination Committee. The Board of Directors is accountable to the GMS in carrying out its duties.

Duties and Responsibilities of the Board of Directors

In general, the duties and responsibilities of the Board of Directors include:

1. Full responsibility for the operational activities of the Bank and management of its business in accordance with the authority and responsibility as stipulated in the Articles of Association as well as applicable rules and applicable regulations.
2. Implement the principles of Good Corporate Governance in all aspects of the business of the Bank and at every level of the organisation.
3. Discuss audit findings and recommendations from internal, external, and OJK audits and/or audits from other regulators or authorities.
4. Develop and ensure the effective implementation of Risk Management at every level of the organisation and ensure that the Risk Management function operates independently.
5. Report its duties and accountabilities to the GMS.

Board of Directors Charter

The Board of Directors has a Board Manual as guidelines for the implementation of the Board's duties and responsibilities. The Board Manual is legally binding for all members of the Board. The compilation of the Board Manual refers to the applicable laws and regulations, the Articles of Association of the Bank, and best practices in the financial industry.

Familial and Financial Relationship Between The Board of Directors and The Board of Commissioners

No member of the Board of Directors or Board of Commissioners has any familial or financial relationships with other members of the Board of Directors, members of the Board of Commissioners or with the controlling shareholder.

Kepemilikan Saham di Perusahaan Lain

Tidak ada anggota Direksi yang memiliki saham lebih dari 25% (dua puluh lima persen) modal disetor pada perusahaan lain, baik secara sendiri-sendiri atau bersama-sama.

Rangkap Jabatan

Tidak ada anggota Direksi yang memiliki rangkap jabatan di perusahaan lain.

Rapat Direksi

Pada 2021, Direksi menyelenggarakan 22 kali rapat dengan tingkat kehadiran setiap anggota Direksi sebagai berikut:

No	Anggota Member	Jabatan Position	Jumlah Kehadiran Number of Attendees	Persentase Kehadiran Attendance Rate
1	Lauren Sulistiawati	Presiden Direktur President Director	22/22	100%
2	Ming Hong Chen	Direktur Digital & Strategi Director of Digital & Strategy	21/22	96%
3	Timothy Delahunty	Direktur Operasional, Teknologi Informasi & Finance Director of Operations, Information Technology & Finance	22/22	100%
4	Bagus Harimawan*)	Direktur Human Resources Director of Human Resources	10/11	91%
5	Yessika Effendi	Direktur Kepatuhan Director of Compliance	22/22	100%

*) Tingkat kehadiran dihitung sejak awal masa jabatan mereka sebagai Direktur - Bagus Harimawan efektif menjabat sebagai Direktur per tanggal 30 Juni 2021.

The attendance level calculated since the commencement of their term as Director as follow: - Bagus Harimawan effectively served as Director as of 30 June 2021.

Pelatihan Direksi

Tata Kelola Perusahaan
Good Corporate Governance

Pada 2021, anggota Direksi telah mengikuti berbagai pelatihan internal dan seminar/lokakarya yang diselenggarakan pihak eksternal.

Share Ownership in Other Companies

No member of the Board of Directors owns more than 25% (twenty-five percent) of paid up capital in other companies both individually or collectively.

Concurrent Positions

No member of the Board of Directors has any concurrent position in other companies.

Board of Directors Meetings

In 2021, the Board of Directors held 22 Board meetings with attendance of each Board member recorded as follows:

Board of Directors Trainings

Throughout 2021, members of the Board of Directors have attended various internal training and seminars/workshops held by external parties.

Nama	Training/Seminar Workshop/E-Learning
Lauren Sulistiawati	Perbanas CEO Forum; The Future of Banking – How Banks Stay Relevant; Treasury Dealer Advance Refreshment, CBA Group Continuous Disclosure Policy Training for Disclosure Office; BEAR Training for Designated Reports.
Ming Chen	Solution Architect Certification, Singapore FinTech Festival; The DCAM virtual class.
Timothy Delahunty	Directors' Duties; Enterprise Portfolio Tooling (EPT) Leader Briefing; Treasury Dealer Advance Refreshment; CSO30 Conference & Awards ASEAN; [CrowdCast] Log4j2 Zero-Day Vulnerability Update; Soft Serve CIO Innovation series.
Yessika Effendi	<ul style="list-style-type: none"> • Regulatory and Compliance Workshop – APAC incl. NZ, Cyber Crime Typology & Cross Border Money Laundering; Pembahasan Isu Strategis Pasar Uang dalam RUU P2SK; Discussion on Money Market Strategic Issues in RUU P2SK; • Transformasi Perbankan Digital dengan Pemanfaatan Open Application Programming Interface Digital Banking Transformation by Utilising Open Application Programming Interface; • Koordinasi Implementasi Platform Pertukaran Informasi Dalam Rangka Upaya Pencegahan dan Pemberantasan Tindak Pidana Pendanaan Terorisme di Indonesia Implementation Coordination on Information Exchange Platform to Prevent and Eliminate Terrorism Funding in Indonesia; • Forum Diskusi Makroprudensial terkait Kebijakan Rasio Pembiayaan Inklusif Makroprudensia Macroprudential Discussion Forum relating to Inclusive Financing Ratio Policy; • Pengelolaan Risiko Kepatuhan dari Sudut Pandang Praktisi Perbankan dan Framework Fungsi Kepatuhan Compliance Risk Management from the Point of View of Banking Practitioner and the Framework of Compliance Function; • Penguatan Pengawasan Market Conduct pada Sektor Jasa Keuangan Market Conduct Oversight Strengthening in the Financial Services Sector.
Bagus Harimawan	<ul style="list-style-type: none"> • Strategi Pengembangan Digital Talent dalam Percepatan Transformasi Digital Digital Talent Development Strategy in Digital Transformation Acceleration; • Sertifikasi Manajemen Risiko Tingkat 4 Level 4 Risk Management Certification; Leaders Webinar - Supporting Mental Health at Work

Penilaian Komite di bawah Direksi

Direksi mengadakan kuesioner internal tahunan untuk mengevaluasi kinerja komite di bawah Direksi pada empat (4) bidang utama: efektivitas, perilaku, proses dan pelaporan, serta peran dan tanggung jawab. Hasil evaluasi menunjukkan bahwa semua komite telah dengan baik menjalankan fungsi dan tugas dalam mendukung Direksi pada 2021.

Assessment on Committees Under the Board of Directors

The Board of Directors conducted an annual internal questionnaire to evaluate the performance of committees under the Board of Directors on 4 (four) key areas: effectiveness, behaviour, processes and reporting, roles and responsibilities. The evaluation concluded that all committees have carried out their functions and duties well in supporting the Board of Directors in 2021.

Komite

Committees

Komite Audit

Komite Audit Bank dibentuk untuk mendukung pelaksanaan tugas Dewan Komisaris dalam memantau dan mengevaluasi perencanaan dan pelaksanaan audit dan kecukupan proses laporan pelaporan keuangan termasuk memberikan rekomendasi penunjukan akuntan publik serta melakukan pengawasan terhadap efektivitasnya.

Komposisi Anggota Komite

Komposisi keanggotaan Komite Audit terdiri dari tiga (3) orang:

- 1 (satu) Komisaris Independen
- 1 (satu) pihak independen yang memiliki keahlian di bidang keuangan/akuntansi
- 1 (satu) pihak Independen yang memiliki keahlian di bidang perbankan/manajemen risiko.

Komite Audit diketuai oleh Komisaris Independen yang merangkap sebagai anggota komite. Seluruh anggota Komite Audit merupakan Komisaris Independen dan Pihak Independen atau lebih dari 51% dari jumlah anggota komite sebagaimana yang disyaratkan peraturan. Anggota Komite Audit Bank telah memenuhi ketentuan terkait persyaratan keahlian, integritas, akhlak dan moral yang baik.

Per 31 Desember 2021, anggota Komite Audit Bank adalah:

- **Khairil Anwar**
Komisaris Independen, Ketua Komite, Warga Negara Indonesia
- **Teuku Radja Sjahnan**
Anggota, Warga Negara Indonesia
- **Jono Effendy**
Anggota, Warga Negara Indonesia

Audit Committee

The Bank's Audit Committee was formed to support the Board of Commissioners in overseeing and evaluating audit planning and implementation, and the adequacy of financial reporting process including in providing the recommendation for appointing a public accountant and overseeing its effectiveness.

Composition of Committee

The composition of the Audit Committee consists of 3 (three) members, as follows:

- 1 (one) Independent Commissioner;
- 1 (one) independent party with an expertise in finance/accounting; and
- 1 (one) independent party with an expertise in banking/risk management.

The Audit Committee is chaired by an Independent Commissioner who is also a Committee member. All members of the Audit Committee are Independent Commissioners and independent parties or representing more than 51% of total Committee members as required by regulation. The Bank's Audit Committee members have met the required criteria in areas of expertise, integrity, character and good morals.

As of 31 December 2021, the members of the Bank's Audit Committee are:

- **Khairil Anwar**
Independent Commissioner, Committee Chair, Indonesian Citizen
- **Teuku Radja Sjahnan**
Member, Indonesian Citizen
- **Jono Effendy**
Member, Indonesian Citizen

Profil Anggota Komite Audit

Khairil Anwar

Komisaris Independen, Ketua Komite, Warga Negara Indonesia

Profil beliau dapat dilihat di bab Profil Perusahaan dalam Laporan Tahunan ini pada halaman 57

Teuku Radja Sjahnan

Anggota, Warga Negara Indonesia

Beliau pernah menjabat sebagai Auditor pada Badan Pemeriksa Keuangan RI, Anggota Komite Audit pada Bank BNI, Bank Barclays Indonesia, Bank BNI Syariah dan Bank Muamalat Indonesia dan PT First State Investments Indonesia. Saat ini beliau sebagai Konsultan di PT Dua Radja Net, Komisaris Independen PT FWD Asset Manajemen.

Jono Effendy

Anggota, Warga Negara Indonesia

Beliau pernah menjabat sebagai anggota Komite Audit dan Komite Pemantau Risiko di berbagai perusahaan lain, seperti PT Bank Barclays Indonesia, PT BII Finance Center, PT BFI Finance Indonesia Tbk, dan Bank BNP Paribas Indonesia.

Saat ini, beliau menduduki jabatan sebagai Komisaris Independen sekaligus sebagai Ketua Komite Pemantau Risiko di PT FWD Indonesia, serta menjadi Managing Director dan pengajar di PT Mudita Finansial Teknologi.

Independensi Komite Audit

Anggota Komite Audit merupakan Komisaris Independen dan Pihak Independen yang telah memenuhi persyaratan independensi.

Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Komite Audit meliputi:

1. Menyampaikan laporan kepada Dewan Komisaris untuk setiap penugasan, pemantauan dan evaluasi atas perencanaan dan pelaksanaan audit, serta pemantauan atas tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian internal, termasuk kecukupan proses pelaporan keuangan.
2. Menyampaikan rekomendasi kepada Dewan Komisaris terhadap:
 - a. Pelaksanaan fungsi audit internal.
 - b. Memastikan kesesuaian tindakan akuntan publik dengan standar audit.
 - c. Memastikan laporan keuangan sesuai dengan standar akuntansi keuangan yang berlaku.

Audit Committee Member Profile

Khairil Anwar

Independent Commissioner, Committee Chair, Indonesian Citizen

Khairil Anwar's profile can be found in the Company Profile chapter of this Annual Report on page 57

Teuku Radja Sjahnan

Member, Indonesian Citizen

Previously was an auditor at the Indonesian Supreme Audit Board. He has been a member of the Audit Committee at Bank BNI, Bank Barclays Indonesia, Bank BNI Syariah and Bank Muamalat Indonesia. He is currently a Consultant of PT Dua Radja Net, Independent Commissioner of PT FWD Asset Management.

Jono Effendy

Member, Indonesian Citizen

He served as a member of the Audit Committee and Risk Oversight Committee at several other companies including PT Bank Barclays Indonesia, PT BII Finance Centre, PT BFI Finance Indonesia Tbk, and Bank BNP Paribas Indonesia.

Currently, he holds the position of Independent Commissioner as well as the Chairman of the Risk Oversight Committee of PT FWD Indonesia, as well as being the Managing Director and lecturer at PT Mudita Finansial Teknologi.

Independence of the Audit Committee

All members of the Audit Committee are Independent Commissioners and Independent Parties that have met requirements for independence.

Duties and Responsibilities

The duties and responsibilities of the Audit Committee include:

1. Provide reports to the Board of Commissioners for each assignment, monitor and evaluate the planning and implementation of audits, as well as monitoring the follow up of audit results in order to assess the adequacy of internal controls that includes the adequacy of the financial reporting process
2. Provide recommendations to the Board of Commissioners on:
 - a. Implementing the internal audit function.
 - b. Ensuring the conduct of assigned public accountants is in accordance with audit standards.
 - c. Ensuring that financial statements are in compliance with prevailing accounting standards.



- d. Pelaksanaan rencana aksi perbaikan yang sudah disetujui oleh Direksi berdasarkan temuan Audit Internal, akuntan publik, dan hasil pengawasan OJK serta regulator lainnya.
 - e. Potensi benturan kepentingan.
3. Memantau dan mengevaluasi efektivitas pelaksanaan audit internal Bank, termasuk kinerja dan laporan audit internal, serta memberikan rekomendasi atas rencana audit, pengangkatan dan pemberhentian Kepala Audit Internal serta Piagam Audit Internal.
4. Memberikan rekomendasi mengenai penunjukan Akuntan Publik dan Kantor Akuntan Publik kepada Dewan Komisaris, untuk diputuskan oleh RUPS.

Piagam Komite

Komite Audit memiliki piagam (*charter*) yang mengatur antara lain tugas dan tanggung jawab, wewenang, keanggotaan, etika kerja, dan penyelenggaraan rapat. *Charter* Komite Audit ditinjau secara berkala dan diperbarui sesuai dengan perkembangan peraturan.

Rapat Komite Audit

Komite Audit telah mengadakan rapat sebanyak enam (6) kali selama tahun 2021. Pemenuhan kewajiban rapat Komite Audit selain mengacu pada peraturan Tata Kelola Bank juga memerhatikan peraturan OJK Pasar Modal yaitu rapat wajib diadakan satu kali dalam dua (2) bulan. Berikut rekapitulasi kehadiran masing-masing anggota komite:

No	Anggota Member	Jabatan Title	Jumlah Kehadiran Number of Attendance	Percentase Kehadiran Attendance Percentage
1	Khairil Anwar	Ketua Chairman	6/6	100%
2	Teuku Radja Sjahnan	Anggota Member	6/6	100%
3	Jono Effendy	Anggota Member	6/6	100%

Pelaksanaan Kegiatan Komite Audit

Selama tahun 2021, Komite Audit telah melakukan pembahasan dan memberikan rekomendasi terkait Perencanaan Audit dan realisasinya, laporan audit yang diterbitkan selama periode pelaporan, temuan signifikan dan tindak lanjut, serta laporan keuangan Bank.

Selain itu, Komite Audit juga memberikan rekomendasi dalam penunjukkan Akuntan Publik dan Kantor Akuntan Publik untuk tahun buku yang berakhir pada tanggal 31 Desember 2021 serta melakukan evaluasi terhadap pelaksanaan pemberian jasa audit untuk tahun buku yang berakhir pada tanggal 31 Desember 2020 yang dilakukan oleh Akuntan Publik dan Kantor Akuntan Publik yang ditunjuk.

- d. Executing agreed upon corrective action plans by the Board of Directors for findings from internal audits, public accountants, and supervision results of OJK and other regulators.
 - e. Potential of conflicts of interest.
3. Monitor and evaluate the effectiveness of the Bank's internal audit implementation including performance and internal audit reports, as well as providing recommendations on audit plans, appointments and dismissals of the Head of Internal Audit and the Internal Audit Charter.
4. Provide recommendations on the appointment of a Public Accountant and Public Accounting Firm to the Board of Commissioners, to be decided by the GMS.

Committee Charter

The Audit Committee has a charter outlining its duties and responsibilities, authority, memberships, work ethics, and meetings. The Audit Committee charter is reviewed periodically and updated according to developments in regulations.

Audit Committee Meetings

In 2021, the Audit Committee held a total of 6 (six) meetings. The Audit Committee fulfils its meeting obligations in accordance with the Bank's Governance Regulation and the Capital Market OJK regulations, and meetings are held once every 2 (two) months. The following is a recapitulation of the attendance of each committee member:

Audit Committee Activities

In 2021, the Audit Committee discussed and provided recommendations for the Audit Plan and its realisation, audit report issued during the reporting period, significant findings and follow up actions, and the Bank's financial statements.

In addition, the Audit Committee also provided recommendations on appointing a Public Accountant and Public Accounting Firm for the financial year ended 31 December 2021 as well as evaluating the provision of audit services for the financial year ended 31 December 2020 conducted by appointed Public Accountant and Public Accounting Firm.

Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi merupakan komite yang membantu Dewan Komisaris dalam menjalankan fungsi dan tugasnya terkait penetapan remunerasi dan nominasi anggota Direksi dan anggota Dewan Komisaris.

Anggota dan Komposisi Komite

Anggota Komite Remunerasi dan Nominasi paling kurang terdiri dari satu (1) orang Komisaris Independen, satu (1) orang Komisaris, dan satu (1) orang Pejabat Eksekutif yang membawahi fungsi Sumber Daya Manusia.

Jumlah dan komposisi Komite Remunerasi dan Nominasi Bank Commonwealth telah memenuhi persyaratan regulasi yaitu terdiri dari:

- 2 (dua) Komisaris Independen
- 2 (dua) Komisaris non Independen; dan
- 1 (satu) Pejabat Eksekutif yang bertanggung jawab atas Fungsi Sumber Daya Manusia

Per tanggal 31 Desember 2021, anggota Komite Remunerasi dan Nominasi terdiri dari:

Suwartini

Komisaris Independen, Ketua Komite, Warga Negara Indonesia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 56.

Khairil Anwar

Komisaris Independen, Anggota, Warga Negara Indonesia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 57.

David Antony Keith Cohen

Presiden Komisaris, Anggota, Warga Negara Australia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 55.

Stephen Vile

Wakil Presiden Komisaris, Anggota, Warga Negara Australia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 56.

Nina Avrianty

Pejabat Eksekutif, Anggota, Warga Negara Indonesia

Nina Avrianty bergabung sebagai anggota Komite Remunerasi dan Nominasi per tanggal 30 Juni 2021 melalui Surat Rekomendasi Komite Remunerasi & Nominasi No. 004/RNC/VII/2021.

Remuneration and Nomination Committee

The Remuneration and Nomination Committee supports the Board of Commissioners in determining the remuneration and nomination for members of the Board of Directors and the Board of Commissioners.

Committee Members and Composition

Members of the Remuneration and Nomination Committee must consist of at least 1 (one) Independent Commissioner; 1 (one) Commissioner and 1 (one) Executive Officer in charge of Human Resources.

The composition of the Remuneration and Nomination Committee of the Bank has met its regulatory requirements, consisting of:

- 2 (two) Independent Commissioners;
- 2 (two) non-independent Commissioners; and
- 1 (one) Executive Officer responsible for Human Resources function.

As of 31 December 2021, the members of the Remuneration and Nomination committee are:

Suwartini

Independent Commissioner, Committee Chair, Indonesian Citizen

Profile for Suwartini can be found in the Company Profile chapter of this Annual Report on page 56.

Khairil Anwar

Independent Commissioner, Member, Indonesian Citizen

Profile for Khairil Anwar can be found in the Company Profile chapter of this Annual Report on page 57.

David Antony Keith Cohen

President Commissioner, Member, Australian Citizen

Profile for David Cohen can be found in the Company Profile chapter of this Annual Report on page 55.

Stephen Vile

Vice President Commissioner, Member, Australian Citizen

Profile for Stephen Vile can be found in the Company Profile chapter of this Annual Report on page 56.

Nina Avrianty

Executive Officer, Member, Indonesian Citizen

Nina Avrianty joined as a member in the Remuneration and Nomination Committee from 30 June 2021 following the Recommendation Letter of Remuneration and Nomination Committee No. 004/RNC/VII/2021.

Beliau meraih gelar Bachelor of Science dari Iowa State University, Amerika Serikat di tahun 1999 dan telah memiliki lebih dari 15 tahun pengalaman di industri perbankan.

Beliau memulai kariernya di PT Primus Financial Services (anak perusahaan Ford Motor Credit Company) sebagai Financial Analyst (2000-2002) dan kemudian melanjutkan kariernya di Citibank, N.A. Indonesia, tempat beliau memangku berbagai jabatan di fungsi Keuangan. Beliau mulai berkecimpung di bidang Sumber Daya Manusia pada tahun 2013 sebagai Head of Compensation & Benefit. Beliau kemudian meniti karier di Bank sebagai SVP, HR Strategy & Workforce Analyst (2017-2018), Head of HR Shared Services, Remuneration & HR Analytics (2018-2020), dan saat ini menjabat sebagai Head of Rewards & Governance (2021 – sekarang).

Independensi Komite Remunerasi dan Nominasi

Untuk mendukung aspek independensi, Komite Remunerasi dan Nominasi diketuai oleh Komisaris Independen. Selain itu, tidak terdapat anggota Direksi yang menjadi anggota Komite Remunerasi dan Nominasi.

Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Komite Remunerasi dan Nominasi meliputi:

Fungsi Nominasi:

1. Menyusun dan memberikan rekomendasi kepada Dewan Komisaris mengenai:
 - Ketentuan, kebijakan, dan kriteria anggota Direksi dan anggota Dewan Komisaris yang dibutuhkan untuk disampaikan kepada RUPS.
 - Komposisi jabatan anggota Direksi dan/atau anggota Dewan Komisaris.
 - Penunjukkan dan/atau pergantian anggota Direksi dan/atau anggota Dewan Komisaris, termasuk anggota Komite di bawah Dewan Komisaris.
 - Penunjukkan dan/atau pergantian pihak independen yang akan menjadi anggota Komite Audit dan/atau Komite Pemantauan Risiko.
 - Kebijakan evaluasi kinerja bagi anggota Direksi dan/ atau anggota Dewan Komisaris.
2. Memberikan usulan calon yang memenuhi syarat sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada Dewan Komisaris untuk disampaikan kepada RUPS.

She received her Bachelor of Science from Iowa State University, United States in 1999 and has more than 15 years of experience in the banking industry.

She started her career in PT Primus Financial Services (subsidiary of Ford Motor Credit Company) as a Financial Analyst (2000 – 2002) and followed it up in Citibank, N.A. Indonesia where she held various positions in the Finance function. She joined the Human Resources field in 2013 as Head of Compensation & Benefit. She then pursued her career in Bank Commonwealth as SVP, HR Strategy & Workforce Analyst (2017-2018), Head of HR Shared Services, Remuneration & HR Analytics (2018-2020), and is currently serving as Head of Rewards & Governance (2021 – now).

Independence of the Remuneration and Nomination Committee

To support its independence, the Remuneration and Nomination Committee is chaired by Independent Commissioners. Furthermore, there are no members of the Board of Directors in the Remuneration and Nomination Committee.

Duties and Responsibilities

The duties and responsibilities of the Remuneration and Nomination Committee include:

In regards to Nomination:

1. Prepare and provide recommendations to the Board of Commissioners regarding:
 - Provisions, policies and criteria for members of the Board of Directors and members of the Board of Commissioners that are required to be submitted to the GMS.
 - Composition of members of the Board of Directors and/or members of the Board of Commissioners.
 - Appointment and/or replacement of members of the Board of Directors and/or members of the Board of Commissioners, including members of the Committees under the Board of Commissioners.
 - Appointment and/or replacement of independent parties who will become members of the Audit Committee and/or Risk Oversight Committee.
 - Performance evaluation for members of the Board of Directors and/or members of the Board of Commissioners.
2. Propose candidates who meet the requirements to be members of the Board of Directors and/or members of the Board of Commissioners to the Board of Commissioners for submission to the GMS.

3. Membantu Dewan Komisaris melakukan penilaian kinerja anggota Direksi dan/atau anggota Dewan Komisaris berdasarkan standar yang telah dibuat sebagai dasar evaluasi.
4. Memberikan rekomendasi kepada Dewan Komisaris mengenai program pengembangan kemampuan anggota Direksi dan/atau anggota Dewan Komisaris.

Fungsi Remunerasi:

1. Memberikan rekomendasi kepada Dewan Komisaris mengenai tinjauan/hasil evaluasi terhadap:
 - Struktur Remunerasi
 - Kebijakan atas Remunerasi bagi seluruh pegawai, terutama hal-hal yang memberikan dampak signifikan/material kepada Bank, dan disampaikan kepada Direksi.
 - Besaran atas Remunerasi
2. Memastikan bahwa Kebijakan Remunerasi telah sesuai ketentuan.
3. Melakukan evaluasi secara berkala penerapan kebijakan remunerasi.
 - Membantu Dewan Komisaris melakukan penilaian kinerja berdasarkan Remunerasi masing-masing anggota Direksi dan/atau Dewan Komisaris.

Piagam Komite

Komite memiliki piagam (charter) sebagai pedoman dan tata tertib kerja, yang mengatur tugas dan tanggung jawab, wewenang, larangan, keanggotaan, etika kerja, dan rapat.

Rapat Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi wajib mengadakan rapat berkala setidaknya satu (1) kali dalam empat (4) bulan dan dapat ditambahkan sesuai kebutuhan sebagaimana yang tercantum dalam Piagam dan Kebijakan Komite Remunerasi dan Nominasi.

Selama tahun 2021, Komite Remunerasi dan Nominasi telah melaksanakan enam (6) kali rapat dengan tingkat kehadiran masing-masing anggota komite sebagai berikut:

3. Assist the Board of Commissioners in conducting performance assessments of the members of the Board of Directors and/or members of the Board of Commissioners based on standards that have been prepared as the basis of evaluation.
4. Provide recommendations to the Board of Commissioners regarding capability development programs for members of the Board of Directors and/or members of the Board of Commissioners.

In regards to Remuneration:

1. Provide recommendations to the Board of Commissioners regarding the review/evaluation of:
 - Remuneration structures.
 - Remuneration policies for all employees, especially those with a significant/material impact on the Bank, and submit it to the Board of Directors.
 - The amount of Remuneration.
2. Ensure that the Remuneration Policy is in compliance with regulation.
3. Conduct periodic evaluation on the implementation of the Remuneration Policy
 - Assist the Board of Commissioners in conducting performance evaluation of each member of the Board of Directors and the Board of Commissioners according to their individual remuneration.

Committee Charter

The Committee has a charter as a guideline and code of conduct that governs its duties and responsibilities, authorities, prohibitions, membership, work ethics, and meetings.

Remuneration and Nomination Committee Meetings

The Remuneration and Nomination Committee must hold regular meetings at least once every 4 (four) months and can be added as needed as stated in the Remuneration and Nomination Committee Charter and Policy.

Throughout 2021, the Remuneration and Nomination Committee held 6 (six) meetings with details of attendance as follows:

No	Anggota Member	Jabatan Title	Jumlah Kehadiran Total Attendance	Percentase Kehadiran Attendance Percentage
1	Suwartini	Ketua Chairwoman	6/6	100%
2	Khairil Anwar	Anggota Member	6/6	100%
3	David Cohen	Anggota Member	6/6	100%
4	Stephen Vile	Anggota Member	6/6	100%
5	Bagus Harimawan ^{a)}	Pejabat Eksekutif Direktorat Sumber Daya Manusia Executive Officer in Human Resources	3/3	100%
6	Nina Avrianty*	Pejabat Eksekutif Direktorat Sumber Daya Manusia Executive Officer in Human Resources	3/3	100%

^{a)} Bagus Harimawan tidak menjabat sebagai anggota Komite setelah efektif menjadi Direktur Sumber Daya Manusia per 30 Juni 2021 dan digantikan dengan Nina Avrianty, pejabat eksekutif di bidang Sumber Daya Manusia efektif per 30 Juni 2021.

^{*} Bagus Harimawan was the member of the Committee until he was appointed by the Bank to be Director responsible for Human Resource effective 30 June 2021. Nina Avrianty, executive officer in Human Resources, was appointed to take the place as member of the Committee effective 30 June 2021.

Kegiatan Komite Remunerasi dan Nominasi

Selama tahun 2021, Komite Remunerasi dan Nominasi telah melaksanakan tugas dan tanggung jawabnya sebagai berikut:

- Menerima dan mencatat pengunduran diri Leila Djaafar, Chief of Marketing, Corporate Affairs & Legal efektif pada 1 Maret 2021, dan memberikan dukungan atas usulan Struktur Organisasi yang baru.
- Mencatat dan mendukung usulan agar pihak eksternal memberikan tinjauan independen atas kinerja anggota Dewan Komisaris lokal setiap tahun.
- Mencatat dan memberikan rekomendasi usulan masa jabatan anggota Komite.
- Meninjau dan merekomendasikan perpanjangan masa jabatan Suwartini, Komisaris Independen, selama periode tiga (3) tahun.
- Meninjau dan memberikan rekomendasi untuk menunjuk Bagus Harimawan, Chief of Human Resources, sebagai Direktur yang bertanggung jawab atas Sumber Daya Manusia, berdasarkan hasil Uji Kemampuan dan Kepatutan.
- Mendukung perubahan dalam Struktur Organisasi Bank terkini.
- Mencatat dan mendukung perubahan Komite SDM Direksi menjadi Forum SDM (*People Forum*), termasuk cakupan dan keanggotaan Forum.
- Mencatat dan menyetujui penunjukan Nina Avrianty, Head of Rewards & Governance, sebagai Perwakilan Karyawan dan anggota Komite Remunerasi & Nominasi.
- Mencatat dan mendukung keputusan gaji pokok dan penyesuaian bagi karyawan Bank tahun 2021.

Remuneration and Nomination Committee Activities

In 2021, the Remuneration and Nomination Committee carried out its duties and responsibilities as follows:

- Received and noted the resignation of Ms. Leila Djaafar, Chief of Marketing, Corporate Affairs, & Legal effective 1 March 2021, and provided support on the proposed new organisation structure for the directorate.
- Noted and supported the proposal to appoint an external party in providing an independent review on local Board of Commissioner members' performance on an annual basis.
- Noted and provided recommendations for term of office for Committee members.
- Reviewed and recommended the extension of the term of Mrs. Suwartini, Independent Commissioner, for a further 3 (three) year period.
- Reviewed and provided a recommendation to appoint Mr. Bagus Harimawan, Chief of Human Resources as Director responsible for Human Resources, based on Mr. Harimawan's Fit & Proper Test result.
- Supported changes as reflected in the Bank's revised organisation structure.
- Noted and supported changes to the People Committee reporting to the Board of Directors to the People Forum, including Forum coverage and membership.
- Noted and agreed with the appointment of Ms. Nina Avrianty, Head of Rewards & Governance, as Employee Representative and member of the Remuneration & Nomination Committee.
- Noted and supported the result of 2021 base salary and adjustments for employees.

- Mencatat dan memberikan dukungan atas rekomendasi termasuk catatan tambahan untuk memperoleh persetujuan Dewan Komisaris atas remunerasi Direksi sesuai dengan persyaratan tata kelola yang tepat.
 - Menyetujui dan memberikan rekomendasi untuk memperpanjang masa jabatan David Antony Keith Cohen sebagai Presiden Komisaris dan anggota Komite Remunerasi dan Nominasi selama periode tiga (3) tahun
 - Menerima dan mencatat intensi Stephen Vile untuk menyelesaikan masa jabatannya saat ini dan kemudian pensiun. Komite mengusulkan seorang kandidat berpotensi dari lokal untuk menjadi Komisaris Independen.
 - Meninjau dan memberikan rekomendasi untuk memperpanjang masa jabatan Khairil Anwar sebagai Komisaris Independen dan melanjutkan perannya di Komite Audit, Komite Pemantau Risiko, dan Komite Remunerasi dan Nominasi selama periode tiga (3) tahun.
 - Meninjau dan memberikan rekomendasi untuk memperpanjang masa jabatan Jono Effendi sebagai Anggota Independen Komite Audit & Pemantau Risiko selama periode tiga (3) tahun.
 - Mencatat dan mendukung rencana suksesi Bank untuk posisi satu tingkat di bawah Presiden Direktur.
 - Meninjau dan memberikan rekomendasi atas penunjukan Teuku Radja Sjahnan sebagai Komisaris Independen berdasarkan hasil Uji Kemampuan dan Kepatutan OJK.
 - Mencatat dan mendukung tinjauan tahunan Kebijakan Remunerasi Bank untuk Komisaris Lokal.
- Noted and supported on the recommendation to include additional notes to obtain the Board of Commissioners approval for the Board of Director's remuneration following appropriate governance requirements.
 - Agreed and provided a recommendation for the extension of David Antony Keith Cohen as President Commissioner and member of Remuneration and Nomination Committee for the period of 3 (three) years.
 - Received and noted Stephen Vile's intention to complete the current term of his appointment and retire afterward. The Committee suggested a local potential candidate as Independent Commissioner.
 - Reviewed and provided a recommendation for the extension of Khairil Anwar's term as Independent Commissioner and continued role in the Audit Committee, Risk Oversight Committee, and Remuneration and Nomination Committee for a further 3 (three) years.
 - Reviewed and provided a recommendation for the extension of Jono Effendi as Independent Member of Audit & Risk Oversight Committee for a further 3 (years).
 - Noted and supported the Bank's succession plan for the President Director's direct reports.
 - Reviewed and provided a recommendation for the appointment of Teuku Radja Sjahnan to be an Independent Commissioner subject to OJK's Fit & Proper Test.
 - Noted and supported the annual review of the Bank's Remuneration Policy for Local Commissioners.

Komite Pemantau Risiko

Komite Pemantau Risiko membantu Dewan Komisaris dalam menjalankan fungsi pengawasan manajemen risiko, serta memberikan rekomendasi kerangka kerja dan kebijakan manajemen risiko sesuai dengan Selera Risiko Bank.

Anggota dan Komposisi Komite

Susunan keanggotaan Komite Pemantau Risiko telah memenuhi persyaratan yang ditetapkan peraturan . Komite Pemantau Risiko Bank terdiri dari:

- 2 (Dua) Komisaris Independen;
- 1 (Satu) Pihak Independen yang memiliki keahlian di bidang keuangan dan akuntansi; dan
- 1 (Satu) Pihak Independen yang memiliki keahlian di bidang perbankan dan manajemen risiko. Komite Pemantau Risiko diketuai oleh Komisaris Independen.

The Risk Oversight Committee

The Risk Oversight Committee assists the Board of Commissioners in conducting its risk management oversight function, as well as providing recommendations for risk management frameworks and policies in accordance with the Bank's risk appetite.

Committee Members and Composition

The composition of the Risk Oversight Committee has met regulatory requirements. The Bank's Risk Oversight Committee consists of:

- 2 (two) Independent Commissioners;
- 1 (one) Independent Party with expertise in finance and accounting; and
- 1 (one) Independent Party with expertise in banking and risk management. The Risk Oversight Committee is chaired by an Independent Commissioner.

Per 31 Desember 2021, keanggotaan Komite Pemantau Risiko terdiri dari:

Suwartini

Ketua Komite, Warga Negara Indonesia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 56

Khairil Anwar

Anggota, Warga Negara Indonesia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 57

Teuku Radja Sjahnan

Anggota, Warga Negara Indonesia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 136

Jono Effendy

Anggota, Warga Negara Indonesia

Profil beliau dapat dilihat pada bab Profil Perusahaan Laporan Tahunan ini di halaman 136

Independensi Komite Pemantau Risiko

Seluruh anggota Komite Pemantau Risiko merupakan Komisaris Independen dan Pihak Independen.

Piagam Komite

Komite Pemantau Risiko memiliki Piagam (*charter*) sebagai acuan dalam melaksanakan tugas dan tanggung jawab Komite. Piagam Komite mengatur uraian tugas, tanggung jawab, wewenang, larangan, keanggotaan, etika kerja, rapat, dan lainnya.

Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Komite Pemantau Risiko antara lain:

1. Melakukan pemantauan terhadap area-area risiko yang dikelola oleh Bank, di antaranya Risiko Kredit, Pasar, Likuiditas, Operasional, Hukum, Reputasi, Kepatuhan, dan Strategis, serta memastikan bahwa penerapan manajemen risiko telah sesuai dengan kebijakan manajemen risiko.
2. Memantau dan menilai kinerja Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko.
3. Memantau perkembangan kasus hukum yang melibatkan Bank dan menilai risiko terkait, seperti risiko hukum, reputasi, dan kepatuhan.
4. Secara berkala melaporkan kegiatannya, termasuk memberikan rekomendasi terkait hal-hal yang menjadi perhatian Dewan Komisaris.

As at 31 December 2021, the membership of the Risk Oversight Committee consists of:

Suwartini

Committee Chair, Indonesian Citizen

Profile for Suwartini can be found in the Company Profile chapter of this Annual Report on page 56

Khairil Anwar

Member, Indonesian Citizen

Profile for Khairil Anwar can be found in the Company Profile chapter of this Annual Report on page 57

Teuku Radja Sjahnan

Member, Indonesian Citizen

Profile for Teuku Sjahnan can be found in the Good Corporate Governance chapter of this Annual Report on page 136

Jono Effendy

Member, Indonesian Citizen

Profile for Jono Effendy can be found in the Good Corporate Governance chapter of this Annual Report on page 136

Independence of the Risk Oversight Committee

All members of the Risk Oversight Committee are Independent Commissioners and Independent Parties.

Committee Charter

The Risk Oversight has a Committee Charter to provide guidelines for the Committee's roles and responsibilities. The Charter describes roles, responsibilities, authorities, prohibitions, membership, work ethics, meetings and other matters.

Duties and Responsibilities

The duties and responsibilities of the Risk Oversight Committee include:

1. Provide oversight on risk areas managed by the Bank, namely Credit, Market, Liquidity, Operational, Legal, Reputation, Compliance and Strategic Risk, and ensure that the application of risk management is in accordance with risk management policies.
2. Monitor and assess the performance of the Risk Management Committee and Risk Management Function.
3. Monitor the development of legal cases involving the Bank and assessing related risks, such as legal, reputation and compliance risks.
4. Periodically report on its activities, including providing advice on matters of concern to the Board of Commissioners.

Rapat Komite Pemantau Risiko

Komite Pemantau Risiko telah menyelenggarakan rapat sebanyak enam (6) kali selama 2021. Berikut tingkat kehadiran anggota komite dalam rapat komite selama 2021:

No	Anggota Member	Jabatan Title	Jumlah Kehadiran Total Attendance	Percentase Kehadiran Attendace Percentage
1	Suwartini	Ketua Chairwoman	6/6	100%
2	Khairil Anwar	Anggota Member	6/6	100%
3	Teuku Radja Sjahnan	Anggota Member	6/6	100%
4	Jono Effendy	Anggota Member	6/6	100%

Pelaksanaan Kegiatan Komite Pemantau Risiko

Pelaksanaan tugas Komite Pemantau Risiko tahun 2021 adalah sebagai berikut:

1. Memantau dan mengevaluasi kebijakan Manajemen Risiko.
2. Meninjau delapan jenis Profil Risiko Bank, diantaranya Risiko Kredit, Pasar, Likuiditas, Operasional, Reputasi, Hukum, Strategis, dan Kepatuhan.
3. Memantau Selera Risiko, termasuk limit toleransi dan limit risiko sesuai dengan metrik risiko yang telah ditetapkan untuk delapan jenis risiko dan ketahanan modal.
4. Memantau permodalan Bank dengan mengaitkan tingkat risiko dengan kecukupan modal sesuai dengan ketentuan *Internal Capital Adequacy Assessment Process* (ICAAP) untuk mengantisipasi potensi kerugian yang dapat timbul dari aktivitas usaha Bank.
5. Memantau dan mengevaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko, termasuk menyetujui perubahan dalam *Risk Appetite Statement*.

Risk Oversight Committee Meetings

The Risk Oversight Committee held 6 (six) meetings in 2021. Below is the details of the attendance of its members:

Risk Oversight Committee Activities

The duties performed by the Risk Oversight Committee in 2021 are as follows:

1. Monitored and evaluated Risk Management policies.
2. Reviewed the eight types of risks captured within the Bank's Risk Profile, including Credit, Market, Liquidity, Operational, Reputation, Legal, Strategic and Compliance Risk.
3. Monitored the Bank's Risk Appetite, including tolerance limits and risk limits in accordance with the risk metrics that have been set for eight types of risk, and the Bank's capital resilience.
4. Monitored the Bank's capital by linking the level of risk to capital adequacy in accordance with the provisions of the Internal Capital Adequacy Assessment Process (ICAAP) to anticipate potential losses that may arise from the Bank's business activities.
5. Monitored and evaluated the implementation of the duties of the Risk Management Committee and Risk Management Function, including approving changes in the *Risk Appetite Statement*.

Komite-komite di bawah Direksi

Committees under The Board of Director

Komite-komite yang membantu Direksi dalam melaksanakan tugas dan tanggung jawabnya adalah:

1. Komite Manajemen Risiko
2. Komite Asset and Liability (ALCO)
3. Komite Kredit
4. Komite Kebijakan Kredit
5. Komite Pengarah Teknologi Informasi

Komite Manajemen Risiko

Komite Manajemen Risiko membantu tugas Direksi dalam memantau dan mengelola risiko-risiko yang dihadapi Bank, termasuk Risiko Kredit, Pasar, Likuiditas, Operasional, Hukum, Strategis, Kepatuhan, dan Reputasi.

Anggota Komite Manajemen Risiko antara lain:

- *Chief of Risk* (Ketua)
- Presiden Direktur
- Direktur Kepatuhan
- Chief of Retail & SME Business
- Direktur Operasional, Teknologi Informasi & Finance
- Direktur Digital & Strategi
- *Direktur Sumber Daya Manusia*
- *Chief of Finance*
- *Chief of Customer Excellence & Centralized Services*
- *Chief of Marketing, Corporate Affairs & Legal*
- *Chief of Audit* (tanpa hak suara)
- Head of Enterprise Risk

Tugas dan Tanggung Jawab

1. Membantu Direksi dan Tim Manajemen terkait pemantauan dan pengelolaan:
 - a. Risiko Finansial: Risiko Kredit, Risiko Pasar, dan Risiko Likuiditas.
 - b. Risiko Non-Finansial: Risiko Operasional, Risiko Fraud, Risiko Hukum, Risiko Kepatuhan, Risiko Strategis, dan Risiko Reputasi termasuk memastikan konsistensi terhadap kebijakan internal dan persyaratan peraturan.
2. Memastikan manajemen mengambil langkah-langkah yang diperlukan untuk memantau, mengelola, dan melaporkan permasalahan/eksposur risiko saat ini

The Board of Directors is supported by the following Committees in the execution of their duties and responsibilities:

1. Risk Management Committee
2. Asset and Liability Committee (ALCO)
3. Credit Committee
4. Credit Policy Committee
5. Information Technology Steering Committee

Risk Management Committee

The Risk Management Committee supports the Board of Directors in monitoring and managing Risks, including Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Strategic Risk, Compliance Risk and Reputational Risk.

Members of the Risk Management Committee are:

- Chief of Risk
- President Director
- Compliance Director
- Chief of Retail & SME Business
- Director of Operations, Information Technology & Finance
- Director of Digital & Strategy
- Director of Human Resources
- Chief of Finance
- Chief of Customer Excellence & Centralised Services
- Chief of Marketing, Corporate Affairs & Legal
- Chief of Audit (non-voting)
- Head of Enterprise Risk

Duties and Responsibilities

1. Assist the Board of Directors and the Management Team in monitoring and managing:
 - a. Financial Risk: Credit Risk, Market Risk and Liquidity Risk.
 - b. Non-Financial Risk: Operational Risk, Fraud Risk, Legal Risk, Compliance Risk, Strategic Risk and Reputation Risk including ensuring consistency with internal policies and regulatory requirements.
2. Ensure that management takes the necessary steps to effectively monitor, manage and report risk matters/exposures, including breaches of Early

termasuk pelanggaran terhadap Indikator Peringatan Dini dan Intervensi yang tercantum dalam Pernyataan Selera Risiko kepada Komite Pemantau Risiko.

3. Memastikan pengendalian yang sejalan dengan tujuan strategis Bank, selera risiko, dan kebijakan, serta dipahami oleh dan dikomunikasikan kepada staf terkait.
4. Menetapkan dan memantau kepatuhan terhadap setiap delegasi manajemen risiko dan tindakan yang diambil untuk mengatasi masalah yang timbul di luar otoritas yang didelegasikan.
5. Mengkaji dan mengesahkan kerangka manajemen risiko Bank, yang tidak terbatas pada kerangka ICAAP, Pernyataan Selera Risiko, kerangka kerja Risiko Operasional, dan kerangka kerja Risiko Kepatuhan.
6. Memantau proses dan kebijakan manajemen risiko yang tidak terbatas pada Profil Risiko Bank, KRI, Penilaian Mandiri atas Risiko dan Pengendalian, pengujian pengendalian, dan *anti-fraud*.
7. Mengkaji insiden risiko operasional termasuk kelemahan pengendalian dan penyebab utama *fraud*.
8. Membangun dan melakukan perbaikan yang berkelanjutan terhadap Budaya Manajemen Risiko Bank.
9. Menjadi titik eskalasi untuk hal-hal yang berkaitan dengan manajemen risiko (termasuk penyimpangan dari kebijakan/strategi) dan memberikan pandangan untuk menyelaraskan kebijakan risiko Bank dengan Grup CBA.
10. Memberikan pengesahan atas dokumen-dokumen yang akan diajukan kepada Komite Pemantau Risiko.

Rapat Komite Manajemen Risiko

Rapat Komite Manajemen Risiko telah dilakukan sebanyak enam (6) kali selama tahun 2021.

Komite Aset dan Liabilitas

Komite Aset dan Liabilitas terdiri dari:

- Presiden Direktur (Ketua)
- *Chief of Finance* (Wakil Ketua Pertama)
- *Head of Treasury* (Wakil Ketua Kedua)
- Chief Bisnis Ritel & UKM
- Direktur Digital & Strategi
- Direktur Operasional, Teknologi Informasi & Finance
- *Chief of Risk*
- Direktur Kepatuhan (tanpa hak suara)

Undangan:

- Kepala SKAI (*Chief of Audit*)
- Kepala Manajemen Risiko Perusahaan
- Kepala Bagian Manajemen Likuiditas dan Neraca

Warning Indicators and Intervention Indicators as stated in the Bank's Risk Appetite to the Bank's Risk Oversight Committee.

3. Ensure that appropriate controls are consistent with the Bank's strategic objectives, risk appetite and policies, and are understood and communicated to relevant staff.
4. Establish and monitor compliance with each risk management delegation and the actions taken to address the issues that arise outside of the delegated authority.
5. Review and ratify the Bank's risk management framework, which is not limited to the ICAAP, Risk Appetite Statement, Operational Risk framework and Compliance Risk framework.
6. Monitor risk management processes and policies that are not limited to the Bank's Risk Profile, KRI, Risk and Control Self-Assessment, control testing and anti-fraud.
7. Review operational risk incidents including control weaknesses and the root causes of identified fraud.
8. Build and continuously improve the Bank's Risk Management culture.
9. Act as the point of escalation for matters related to risk management (including deviations from policy/strategy) and provide views in the alignment of Bank's Risk Management Policy to the Commonwealth Bank Group.
10. Provide endorsement for documents that will be submitted to the Bank's Risk Oversight Committee.

Risk Management Committee Meetings

Risk Management Committee meetings were held 6 (six) times in 2021.

Asset and Liability Committee

The Asset and Liability Committee members consist of:

- President Director (Committee Chair)
- Chief of Finance (First Deputy Chair)
- Head of Treasury (Second Deputy Chair)
- Chief of Retail & SME Business
- Director of Digital & Strategy
- Director of Operations, Information Technology & Finance
- Chief of Risk
- Director of Compliance (non-voting)

Invitees:

- Head of Internal Audit Function (Chief of Audit)
- Head of Enterprise Risk Management
- Head of Liquidity Management and Balance Sheet

Tugas dan Tanggung Jawab

Pelaksanaan Tugas dan Tanggung Jawab ALCO selama 2021 adalah sebagai berikut:

1. Mengawasi toleransi dan metodologi atas risiko pasar, likuiditas, pendanaan, manajemen permodalan, dan *funds transfer pricing* sesuai dengan kebijakan Bank.
2. Mengawasi strategi dan posisi Neraca, efektivitas strategi pendanaan, dan manajemen risiko suku bunga dalam *Banking Book*.
3. Mengkaji risiko pasar yang diperdagangkan.
4. Menyetujui dan mengawasi suku bunga produk pinjaman dan simpanan.
5. Mengawasi inisiatif pendanaan Bank (seperti Negotiable Certificate of Deposit (NCD) dan penerbitan obligasi).
6. Menyetujui pengajuan produk Bank.
7. Mengawasi posisi Bank dalam likuiditas Pasar Antar Bank.
8. Mengawasi kemampuan Bank dalam mengelola portofolio investasi.
9. Mengawasi performa bisnis dan perubahan pada margin bunga bersih.
10. Mengawasi profit dan kepatuhan Bank terhadap kebijakan internal serta panduan untuk rasio-rasio utama.

Rapat Komite ALCO

Komite telah menyelenggarakan rapat sebanyak 11 kali selama 2021.

Komite Perkreditan

Komite Perkreditan merupakan komite yang membantu Direksi dalam memastikan bahwa pengambilan keputusan dan pemantauan kredit dilakukan secara bijaksana, sesuai dengan *risk appetite* Bank

Komposisi Komite Perkreditan

Anggota Komite Perkreditan terdiri dari anggota yang memiliki hak suara dan yang tidak memiliki hak suara, sebagaimana diuraikan sebagai berikut:

Anggota Komite Perkreditan dengan Hak Pilih:

- Presiden Direktur (Ketua Komite)
- Chief Bisnis Ritel dan UKM (atau Executive Vice President yang didelegasikan)
- Director of Digital and Strategy

Anggota Komite Perkreditan tanpa Hak Suara (*non-voting*):

- Director of Risk (or delegate)
- Chief of Audit
- Head of Credit Risk Secured Lending

Duties and Responsibilities`

Execution of duties and responsibilities of ALCO in 2021 is as follows:

1. Supervise tolerances and methodologies for managing market risk, liquidity, funding, capital management and funds transfer pricing in accordance with Bank policies.
2. Supervise the Bank's balance sheet strategy and position, the effectiveness of funding strategies, and interest rate management for the Banking Book.
3. Assess traded market risks.
4. Approve and monitor pricing for lending and funding products.
5. Supervise Bank funding initiatives (such as Negotiable Certificate of Deposit (NCD) and bond issuance).
6. Approve new Bank products.
7. Supervise the Bank's position in the Interbank Market.
8. Supervise the Bank's ability to manage its investment portfolios.
9. Supervise business performance and changes in Net Interest Margin.
10. Supervise the Bank's profitability and compliance to internal policies and guidelines for key financial ratios.

ALCO Meetings

The Committee held 11 meetings in 2021.

Credit Committee

The Credit Committee is a committee that supports the Board of Directors in ensuring that decision making and credit monitoring is done prudently, according to the Bank's risk appetite.

Composition of the Credit Committee

The Credit Committee consists of members with voting rights and those without voting rights, as described below:

Members of the Credit Committee with Voting Rights:

- President Director (Committee Chairperson)
- Chief of Retail and SME Business (or delegated Executive Vice President)
- Director of Digital and Strategy

Members of the Credit Committee with Non-Voting Rights:

- Director of Risk (or delegate)
- Chief of Audit
- Head of Credit Risk Secured Lending

- Head of Credit Risk Unsecured Lending
- Head of Secured Lending
- Head of Digital Lending Business

Apabila diperlukan, Direktur Kepatuhan (atau delegasinya) dapat hadir dalam rapat Komite Perkreditan sebagai undangan. Komite Kredit dapat mengundang pejabat eksekutif lain untuk menghadiri rapat. Para undangan tidak memiliki hak suara.

Tugas dan Tanggung Jawab

1. Menyetujui permohonan kredit yang berada di luar kewenangan Unit Bisnis.
2. Menjalankan fungsinya dalam memberikan persetujuan/penolakan kredit secara jujur, objektif, hati-hati, dan cermat.
3. Menolak permintaan kredit yang mana pemohon kredit memiliki konflik kepentingan aktual/potensi dengan pemberian persetujuan kredit.
4. Berkoordinasi dengan Komite Aset dan Liabilitas (ALCO) terkait ketersediaan dana untuk pemberian kredit.

Rapat Komite Perkreditan

Selama tahun 2021, Komite Perkreditan melakukan pembahasan kasus per kasus dan memberikan keputusan melalui sirkuler.

Komite Kebijakan Perkreditan

Komite Kebijakan Perkreditan merupakan komite yang membantu Direksi dalam merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi portofolio kredit , serta memberikan saran dan perbaikan atas risiko kredit kepada Direksi.

Komposisi Komite Kebijakan Perkreditan

Anggota Komite terdiri dari anggota yang memiliki hak pilih dan yang tidak memiliki hak pilih, sebagaimana diuraikan di bawah ini:

Anggota dengan Hak Suara:

- Presiden Direktur (Ketua Komite)
- *Chief of Risk/Direktur Risiko* (atau yang didelegasikan)
- Chief Bisnis Ritel dan UKM (atau Wakil Presiden Eksekutif yang didelegasikan)
- Direktur Digital dan Strategi (atau yang didelegasikan)
- *Head of Operation*

Anggota tanpa Hak Suara:

- Direktur Kepatuhan (atau yang didelegasikan)
- *Chief of Audit*

- Head of Credit Risk Unsecured Lending
- Head of Secured Lending
- Head of Digital Lending Business

When necessary, the Director of Compliance (or a delegate) may attend the Credit Committee meeting as an invitee. The Credit Committee may also invite other executive officials to attend the meeting. Invitees have no right to vote (non-voting).

Duties and Responsibilities

1. Approve loan applications that are above the authority of Business Units.
2. Perform its function in approving or rejecting credit proposals by upholding the principles of honesty, objectivity, prudence and being thorough.
3. Reject credit applications where the credit applicant has an actual or potential conflict of interest with the granting of approval for credit.
4. Coordinate with the Asset and Liability Committee (ALCO) in relation to the provision of funds for credit.

Credit Committee Meeting

In 2021, the Credit Committee reviewed matters case by case and made decisions by circular communications.

Credit Policy Committee

The Credit Policy Committee is a committee that supports the Board of Directors in formulating credit policies, supervising the implementation of those policies, monitoring the development and quality of the Bank's credit portfolio, and providing support and guidance for improvement of credit risk to the Board of Directors.

Composition of the Credit Policy Committee

Members of the Credit Policy Committee consist of voting members and non-voting members, as described below:

Voting members:

- President Director (Committee Chairperson)
- Chief of Risk/Director of Risk (or delegated)
- Chief of Retail and SME Business (or delegated Executive Vice President)
- Director of Digital and Strategy (or delegated)
- Head of Operations

Non-voting Members:

- Compliance Director (or delegated)
- Chief of Audit



- *Head of Credit Risk Secured Lending*
- *Head of Credit Risk Unsecured Lending*
- *Head of Secured Lending*
- *Head of Digital Lending Business*

Tugas dan Tanggung Jawab

1. Memberikan masukan kepada Direksi dalam penyusunan *credit risk appetite* dan Kebijakan Perkreditan Bank.
2. Mengawasi penerapan Kebijakan Perkreditan Bank.
3. Melakukan kajian berkala terhadap Kebijakan Perkreditan Bank dan memberikan saran kepada Direksi dalam hal perbaikan Kebijakan Perkreditan Bank.
4. Memantau dan mengevaluasi:
 - a. Perkembangan dan kualitas portofolio kredit Bank.
 - b. Pelaksanaan kewenangan dalam memutuskan Kredit dan pendeklegasiannya.
 - c. Proses pemberian kredit, risiko konsentrasi kredit, dan kualitas kredit kepada pihak terkait dengan Bank dan debitur besar tertentu.
 - d. Pelaksanaan ketentuan BMPK.
 - e. Ketaatan terhadap ketentuan peraturan perundang- undangan dan peraturan lain dalam pelaksanaan pemberian kredit.
 - f. Penyelesaian kredit bermasalah sesuai dengan Kebijakan Perkreditan Bank.
 - g. Pemenuhan terhadap kecukupan pencadangan kredit dan beban biaya penurunan nilai kredit.
5. Menyampaikan laporan tertulis secara berkala kepada Direksi dengan tembusan kepada Dewan Komisaris mengenai:
 - a. Hasil pengawasan atas pelaksanaan Kebijakan Perkreditan Bank.
 - b. Pemantauan dan evaluasi mengenai hal-hal yang dimaksud dalam Poin 4 di atas.
6. Memberikan saran sebagai langkah perbaikan terhadap risiko kredit kepada Direksi dan Dewan Komisaris.

Rapat Komite Kebijakan Perkreditan

Dalam menjalankan tugasnya, Komite Kebijakan Perkreditan telah menyelenggarakan dua (2) kali rapat selama tahun 2021.

Komite Pengarah Teknologi Informasi

Komite Pengarah Teknologi Informasi (ITSC) membantu Direksi dalam memantau kegiatan TI terkait penyelarasan rencana strategis Teknologi Informasi dengan strategi

- Head of Credit Risk Secured Lending
- Head of Credit Risk Unsecured Lending
- Head of Secured Lending
- Head of Digital Lending Business

Duties and Responsibilities

1. Provide input to the Board of Directors in formulating credit risk appetite and the Bank's Credit Policy.
2. Oversee the implementation of the Bank's Credit Policy.
3. Conduct periodic reviews of the Bank's Credit Policy and provide advice to the Board of Directors for improvements to the Bank's Credit Policy.
4. Monitor and evaluate:
 - a. The development and quality of the Bank's loan portfolios.
 - b. The implementation of authority to approve Credit and respective delegations of authority.
 - c. The process of granting credit, credit concentration risk and quality of credit given to related parties to the Bank and certain large debtors.
 - d. implementation of Legal Lending Limit regulation/policy.
 - e. Compliance with the laws and regulations governing credit extensions.
 - f. Settlement of Non Performing Loans in accordance with the Bank's Credit Policy.
 - g. Ensuring adequacy of loan provisioning and Loan Impairment Expense.
5. Submit written reports to the Board of Directors and the Board of Commissioners in regards to:
 - a. Supervision results on the implementation of the Bank's Credit Policy.
 - b. Monitoring and evaluation on the matters referred to in Point 4 above.
6. Provide recommendations to improve the Bank's credit risk management to the Board of Directors and Board of Commissioners.

Credit Policy Committee Meetings

In carrying out its duties, the Credit Policy Committee held 2 (two) meetings in 2021.

Information Technology Steering Committee

The IT Steering Committee (ITSC) assists the Board of Directors to monitor related IT activities through aligning IT strategic planning with the Bank's business

bisnis Bank, optimalisasi pengelolaan sumber daya, nilai yang diberikan TI (*IT Support Delivery*), pengukuran kinerja dan efektivitas penerapan manajemen risiko.

Komposisi Komite Pengarah Teknologi Informasi

Anggota Komite Pengarah Teknologi Informasi terdiri dari anggota yang memiliki hak suara dan yang tidak memiliki hak suara, sebagaimana diuraikan sebagai berikut:

Anggota dengan Hak Suara

- Direktur Operasional, Teknologi Informasi & Finance (Ketua Komite)
- Presiden Direktur
- Chief Bisnis Ritel & SME
- Direktur Kepatuhan
- Direktur Digital & Strategi
- *Chief of Risk*
- *Chief Information Officer*

Anggota Tanpa Hak Suara

- Direktur Sumber Daya Manusia
- *Chief of Customer Franchise, and Centralized Services*
- *Chief of Audit*
- Kepala Departemen Keamanan Siber TI (Sekretaris)
- Kepala Divisi terkait atau satu tingkat di bawah Direktur/*Chief* dapat diundang dalam rapat komite sebagai *invetee* sesuai agenda yang relevan .

Tata Kelola Perusahaan
Good Corporate Governance

Tugas dan Tanggung Jawab

Secara umum:

1. Menyelaraskan rencana serta implementasi strategis TI dengan strategi bisnis Bank.
2. Secara efektif mengimplementasikan kebijakan pengamanan informasi Bank.
3. Mengambil langkah-langkah mitigasi risiko yang efektif untuk meningkatkan pengamanan informasi Bank.

Secara khusus, namun tidak terbatas pada:

1. Memastikan Rencana Strategis TI sejalan dengan rencana strategis kegiatan usaha Bank. Dalam memberikan rekomendasi, Komite Pengarah TI harus memerhatikan efisiensi, efektivitas, dan faktor-faktor lain, antara lain:
 - Kebutuhan TI yang mendukung strategi bisnis Bank, dengan *roadmap* yang terdiri dari kondisi saat ini, kondisi yang ingin dicapai, dan langkah-langkah yang diperlukan untuk mencapai kondisi yang ingin dicapai.

strategy, resource optimization, IT Support Delivery, performance assessment and the effectiveness of risk management implementation.

Composition of the Information Technology Steering Committee

Members of the Information Technology Steering Committee consist of voting members and non-voting members, as described below:

Members (Voting Rights)

- Director of Operations, Information Technology & Finance (Chairman)
- President Director
- Chief of Retail Banking & SME Business
- Director of Compliance
- Director of Digital & Strategy
- Chief of Risk
- Chief Information Officer

Members (No Voting Rights)

- Director of Human Resources
- Chief of Customer Franchise, and Centralised Services
- Chief of Audit
- IT Cyber Security Dept. Head (Secretary)
- Related Division Head or one level below the Director/Chief can be invited to committee meeting as a invitee in accordance with the relevant agenda

Duties and Responsibilities

In general:

1. Aligning IT strategic plans and their implementation with the Bank's business strategy.
2. Implementing the Bank's information security policy effectively.
3. Taking effective risk mitigation measures to improve the security of the Bank's information.

Specifically, but not limited to:

1. Ensure the IT Strategic Plan is in line with the Bank's Business Strategy. In providing recommendations, the IT Steering Committee has to consider efficiency, effectiveness, and other contributing factors such as:
 - Technology that supports the Bank's business strategy, with a roadmap that covers the current state, the future state, and the steps required to achieve the end objective.

- Sumber Daya yang dibutuhkan.
 - Manfaat yang akan diperoleh saat Rencana Strategis TI diterapkan.
 - Kendala yang mungkin timbul dalam penerapan Rencana Strategis TI.
2. Perumusan kebijakan, standar, dan prosedur TI yang utama, misalnya kebijakan TI yang utama yaitu kebijakan Pengamanan TI dan manajemen risiko terkait penggunaan TI di Bank.
 3. Kesesuaian antara proyek TI yang disetujui dengan Rencana Strategis TI. Komite pengarah TI juga menetapkan status prioritas proyek TI yang bersifat kritis yang berdampak signifikan terhadap kegiatan operasional Bank, misalnya pergantian *core banking application, Production servers*, dan topologi jaringan.
 4. Kesesuaian antara pelaksanaan proyek TI dengan rencana proyek yang disepakati (*project charter*). Komite pengarah TI harus melengkapi rekomendasi dengan hasil analisis dari proyek TI yang utama agar Direksi dapat mengambil keputusan secara efisien.
 5. Kesesuaian antara TI dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank.
 6. Efektivitas langkah-langkah yang efektif dalam meminimalisasi risiko atas investasi Bank pada sektor TI agar investasi Bank pada sektor TI dapat memberikan kontribusi terhadap pencapaian tujuan bisnis Bank.
 7. Pemantauan atas kinerja TI dan upaya peningkatan kinerja TI, misalnya pendekslsian keusangan infrastruktur TI dan pengukuran efektivitas dan efisiensi penerapan kebijakan pengamanan TI.
 8. berbagai masalah terkait TI yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara TI secara efektif, efisien, dan tepat waktu.
 9. Memastikan kecukupan dan alokasi sumber daya yang dimiliki oleh Bank.

Rapat Komite Pengarah Teknologi Informasi

Selama tahun 2021, Komite Pengarah Teknologi Informasi telah menyelenggarakan rapat sebanyak 3 (tiga) kali.

- Resources required.
 - Benefits from the implementation of the IT Strategic Plan.
 - Constraints that may arise in the implementation of IT Strategic Plan.
2. Formulation of the main IT policies, standards and procedures, for example IT Security and Risk Management Policy with regards to the utilisation of technology across the Bank.
 3. Ensuring alignment of approved technology projects with the IT Strategic Plan. The ITSC also decides the priority levels for critical projects that may have a significant impact on the Bank's operational activities, for example changes to core banking applications, Production servers, and network topology
 4. Ensuring alignment of technology projects with approved project plans (*project charter*). The ITSC has to provide recommendations for the key technology projects to support the Board of Directors in making efficient project and portfolio decisions.
 5. Ensuring alignment of the IT function with Management's information system requirements, as well as the Bank's business needs.
 6. Ensuring that steps taken to minimise the risk of the Bank's investments in technology are effective, so as to contribute to the achievement of the Bank's business objectives.
 7. Monitoring technology performance and initiatives in IT to improve performance, for example detecting obsolescence of technology infrastructure and measuring the effectiveness and efficiency of the implementation of IT Security Policies.
 8. Executing initiatives to resolve IT-related problems that cannot be resolved by working units and technology providers in an effective, efficient and punctual manner.
 9. Ensuring there is adequate capacity and allocation of resources owned by the Bank.

Information Technology Steering Committee Meetings

In 2021, the Information Technology Steering Committee held 3 (three) meetings.

Sekretaris Perusahaan

Corporate Secretary

Sekretaris Perusahaan berada di bawah supervisi langsung Direktur Kepatuhan, Hukum dan Sekretaris Perusahaan, serta merupakan organ pendukung Bank. Sekretaris Perusahaan bertindak sebagai mediator bagi Bank dengan pemegang saham dan para pemangku kepentingan, serta mendukung pelaksanaan tugas Direksi, Dewan Komisaris, Komite Audit, dan Komite Pemantau Risiko. Selain itu, Sekretaris Perusahaan juga mendukung kepatuhan Bank terhadap peraturan pasar modal dan memastikan aspek transparansi dan pengungkapan Bank telah dilakukan sesuai peraturan.

Sesuai dengan POJK No. 35/POJK.04/2014, Bank telah menunjuk Stacey Aryadi Suryoputro sebagai Sekretaris Perusahaan melalui Keputusan Direksi No. BOD/RES/2021/IV/001 tertanggal 16 April 2021.

Profil Sekretaris Perusahaan

Stacey Aryadi Suryoputro

Berdomisili di Jakarta, Indonesia

Beliau meraih gelar MBA dari Arkansas State University, dan sebelumnya pernah menjabat sebagai Kepala Strategi di Bank Ganesh, serta berbagai jabatan di PT Bank Permata Tbk., termasuk sebagai Kepala Hubungan Pemerintah dan Investor, Strategi Perusahaan, dan Petugas Riset Pemasaran.

Stacey Aryadi Suryoputro tidak memiliki rangkap jabatan baik di bank lain maupun di perusahaan lain.

Tugas dan Tanggung Jawab

Sesuai dengan Kebijakan Sekretaris Perusahaan, tugas dan tanggung jawab Sekretaris Perusahaan adalah:

1. Mengikuti perkembangan pasar modal, khususnya peraturan perundang-undangan yang berlaku di pasar modal;
2. Memberikan masukan kepada Direksi dan Dewan Komisaris untuk memastikan kepatuhan terhadap standar tata kelola perusahaan yang berlaku, khususnya ketentuan perundang-undangan di bidang Pasar Modal;
3. Membantu Direksi dan Dewan Komisaris dalam penerapan tata kelola perusahaan yang baik agar dapat memenuhi ketentuan yang berlaku, termasuk namun tidak terbatas pada:

The Corporate Secretary reports directly to the Director of Compliance, Legal and Corporate Secretary and is a support function for the Bank. The Corporate Secretary acts as the Bank's mediator with shareholders and stakeholders, supports the implementation of the duties of the Board of Directors, Board of Commissioners, Audit Committee and Risk Oversight Committee. Furthermore, the Corporate Secretary also supports the Bank's compliance with capital market regulations, ensuring that transparency and disclosure has been realised according to regulations.

In compliance with POJK No. 35/POJK.04/2014, the Bank has appointed Stacey Aryadi Suryoputro as Corporate Secretary through the Board of Directors Resolution No. BOD/RES/2021/IV/001 dated 16 April 2021.

Profile of the Corporate Secretary

Stacey Aryadi Suryoputro

Resides in Jakarta, Indonesia

He has an MBA from Arkansas State University, and has previously served as Head of Strategy in Bank Ganesh, and in various roles in PT Bank Permata Tbk., including as Head of Government and Investor Relations, Corporate Strategy, and Marketing Research Officer.

Stacey Aryadi Suryoputro has no concurrent position both in the other banks or other companies.

Duties and Responsibilities

As per the Bank's Corporate Secretary Policy, the Corporate Secretary has the following roles and responsibilities:

1. Keep informed of developments in the capital market, with a particular focus on prevailing laws and regulations;
2. Provide input to the Board of Directors and the Board of Commissioners to ensure compliance with applicable corporate governance standards, particularly statutory provisions in the capital markets;
3. Assist the Board of Directors and the Board of Commissioners in implementing GCG in order to comply with applicable regulations, including but not limited to:

- Manajemen administrasi pemegang saham;
 - Penyelenggaraan dan dokumentasi Rapat Umum Pemegang Saham (RUPS) dan Rapat Umum Pemegang Obligasi (RUPO);
 - Dukungan pelaksanaan seluruh aksi korporasi Bank bersama unit terkait;
 - Bersama dengan Divisi Kepatuhan dan Sumber Daya Manusia dalam memenuhi pelaporan pengangkatan anggota Direksi dan Dewan Komisaris kepada OJK, dan institusi lainnya
4. Menyelenggarakan dan mendokumentasikan rapat Direksi dan Dewan Komisaris, didukung oleh President Director's Office;
 5. Melaksanakan program orientasi untuk Direksi dan Dewan Komisaris, didukung oleh Direktorat Sumber Daya Manusia;
 6. Bertindak sebagai penghubung antara Bank dan pemegang saham, Otoritas Jasa Keuangan, dan pemangku kepentingan lainnya;
 7. Membantu Direksi dan Dewan Komisaris dalam penerapan aspek transparansi agar dapat memenuhi ketentuan yang berlaku mengenai keterbukaan informasi bagi pemangku kepentingan, termasuk ketersediaan informasi di Situs Web Perusahaan dan penyampaian laporan yang tepat waktu kepada regulator, dengan pertimbangan bahwa setiap informasi yang disampaikan oleh Sekretaris Perusahaan kepada masyarakat merupakan informasi resmi dari Perusahaan.

Pelatihan dan Pengembangan Kompetensi Sekretaris Perusahaan

Selama tahun 2021, Sekretaris Perusahaan telah mengikuti pelatihan/seminar/lokakarya sebagai berikut:

- Sertifikasi Manajemen Risiko Level 2
- Kewajiban dan Tanggung jawab Pelaporan dan Pengungkapan Bank sebagai Emiten
- Berbagai modul pembelajaran wajib internal antara lain Pencegahan Praktik Anti-Persaingan, Mengelola Kejahatan Finansial, Kesehatan, Keselamatan dan Kesejahteraan; Anti-Suap dan Korupsi; *Sanctions*; Keamanan Informasi; APU/PPT; Kebijakan Privasi; Manajemen Konflik; dan *Speak Up*.

- shareholder administration management;
 - organisation and documentation of the General Meeting of Shareholders (GMS) and General Meeting of Bondholders (GMB);
 - Together with related units in supporting the implementation of all Bank corporate actions;
 - Together with Compliance and Human Resources, comply with reporting appointments to the Board of Directors and Board of Commissioners to regulators and other institutions.
4. Organise and document meetings of the Board of Directors and the Board of Commissioners, supported by the President Director's Office;
 5. Implement orientation programs for the Board of Directors and Board of Commissioners, supported by the Human Resources directorate;
 6. Act as a liaison between the Bank and shareholders, the Financial Services Authority (OJK), and other stakeholders;
 7. Assist the Board of Directors and the Board of Commissioners in implementing the transparency aspect in order to comply with applicable regulations regarding information disclosure to stakeholders, including the availability of information on the company website and timely submission of reports to regulators, taking into consideration that any information submitted by the Corporate Secretary to the public is official information from the Company.

Corporate Secretary Training and Competency Development

In 2021, the Corporate Secretary has participated in the following training/seminars/workshops:

- Risk Management Certification Level 2
- Obligations and responsibility for reporting and disclosure as a bond issuer
- Various internal Mandatory Learning including: Prevention of Anti-Competitive Practices, Managing Financial Crime, Health, Safety and Wellbeing; Anti-Bribery and Corruption; Sanctions; Information Security; AML/CTF; Privacy Policy; Conflict Management; and Speak Up.

Kegiatan Sekretaris Perusahaan

Selama tahun 2021, Sekretaris Perusahaan telah melakukan tugas dan tanggung jawabnya sebagai berikut:

1. Menyelenggarakan RUPS Tahunan sebanyak satu (1) kali dan RUPS Luar Biasa sebanyak dua (2) kali serta lima (5) Keputusan Dewan Komisaris melalui sirkuler.
2. Memperbarui informasi pada situs web Bank, terkait penerapan GCG Bank, untuk meningkatkan kualitas dan kemudahan akses keterbukaan informasi Bank oleh semua pemangku kepentingan.
3. Mengikuti perkembangan Pasar Modal, terutama aturan dan regulasi yang berlaku, termasuk peraturan baru yang dikeluarkan oleh OJK, BEI, dan regulator lain yang terkait dengan Pasar Modal.
4. Memastikan kepatuhan terhadap kebijakan, prosedur, piagam, dan praktik internal Bank mengenai kewajiban pelaporan regulasi dan POJK yang berkaitan dengan kedudukan Bank sebagai Emiten.
5. Menyerahkan laporan berkala dan insidental kepada regulator berdasarkan ketentuan yang berlaku.
6. Memberikan keterbukaan informasi kepada publik sesuai dengan peraturan yang berlaku.
7. Mengelola, mendistribusikan, dan mempersiapkan tindak lanjut atas surat masuk yang diterima oleh Bank dan ditujukan kepada Direksi dan Dewan Komisaris.
8. Menyelenggarakan dan menyusun hasil evaluasi kinerja tahunan Direksi, Dewan Komisaris, termasuk komite-komite.
9. Membantu dalam persiapan dokumentasi terkait proses Uji Kelayakan dan Kepatutan untuk calon anggota Direksi.
10. Memperbarui dan menyesuaikan Anggaran Dasar Perseroan, Piagam Dewan Komisaris, Piagam Direksi, Piagam Komite Audit, dan Piagam Komite Pemantau Risiko, serta Kebijakan Sekretaris Perusahaan sesuai dengan peraturan perundang-undangan yang berlaku serta praktik Tata Kelola Perusahaan yang baik.
11. Mewakili Bank dalam pengesahan RUPS Sirkuler dengan Notaris eksternal dalam rangka perubahan Anggaran Dasar Bank.

Corporate Secretary Activities

In 2021, the Corporate Secretary has fulfilled the following duties and responsibilities:

1. Organised 1 (one) Annual GMS and 2 (two) Extraordinary GMS as well as 5 (five) Board of Commissioners Resolutions through circulars.
2. Updated the Bank's website with information relating to the Bank's implementation of GCG practices, to improve the ease of access and quality of information.
3. Remained informed with developments in capital markets, in particular applicable rules and regulations, including new regulations issued by the OJK, IDX and other regulators related to capital market operation.
4. Ensured compliance of the Bank's internal policies, procedures, charters and practices against regulatory reporting obligations and other requirements related to Bank's position as a Bond Issuer
5. Submitted periodic and incidental reports to regulators based on applicable regulations.
6. Disclosed information to the public in accordance with applicable regulations.
7. Managed, distributed and prepared follow-ups on incoming letters received by the Bank and addressed to the Board of Directors and Board of Commissioners.
8. Organised and compiled the results of annual performance evaluation of the Board of Directors, Board of Commissioners and their Committees.
9. Assisted in the preparation of documentation related to the Fit and Proper Test processes for prospective members of the Board of Directors.
10. Updated and adjusted the Company's Articles of Association, the Board of Commissioners Charter, the Board of Directors Charter, the Audit Committee Charter and the Risk Oversight Committee Charter, as well as Corporate Secretary Policy in accordance with applicable legislation and regulation, and GCG practices.
11. Represented the Bank on the legalisation of GMS Circulars with an external Notary for changes to the Bank's Articles of Association.

Satuan Kerja Audit Intern

Internal Audit Work Unit

Satuan Kerja Audit Intern (SKAI) berkomitmen dalam memberikan assurance yang independen dan objektif yang menambah nilai serta berkontribusi untuk pencapaian tujuan strategi Bank.

Strategi SKAI adalah untuk memberikan hasil yang bermanfaat melalui aktivitas assurance yang mendukung pelaksanaan strategi Bank serta fokus pada risiko yang muncul, dan gagasan yang dapat ditindaklanjuti untuk hasil yang baik bagi nasabah dan bisnis; memiliki sumber daya yang kompeten dengan wawasan bisnis dan keahlian audit yang kuat, dan kolaborasi yang efektif sebagai cara kerja; dan memiliki metodologi dan perangkat kerja yang sesuai dengan tujuan melalui metodologi audit yang selaras dengan peraturan, praktik d Grup, dan praktik terbaik, dan memperlengkapi diri dengan teknologi yang sesuai dengan kebutuhan dan karakteristik Bank.

Sampai dengan 31 Desember 2021, jumlah anggota SKAI adalah 17 orang.

Profil Kepala SKAI

Reza HM Soemadipradja bergabung dengan PT Bank Commonwealth sebagai Kepala Satuan Kerja Audit Intern pada bulan Juli 2011 berdasarkan surat pengangkatan No.HRPA/8/194/2011.

Kualifikasi/Sertifikasi SKAI

Selama tahun 2021, seluruh anggota SKAI telah tersertifikasi dalam bidang manajemen risiko perbankan sesuai dengan ketentuan Bank Indonesia. SKAI memiliki anggota tim yang berasal dari berbagai latar belakang seperti firma akuntansi, bank lain dan juga dari Unit Kerja lain dengan mayoritas pengalaman audit maupun keahlian dan pengetahuan di area tertentu.

Pendidikan/Pelatihan

SKAI merencanakan dan merealisasikan program peningkatan mutu keterampilan sumber daya yang dimiliki melalui pelatihan maupun program pengembangan lainnya yang terkait dengan pemberian eksposur maupun pengalaman baru. Aktivitas ini dilakukan dengan berkoordinasi dengan unit Sumber Daya Manusia.

SKAI juga menjadwalkan program alih pengetahuan untuk para anggotanya, baik secara internal dengan sharing session (yaitu mengundang pembicara dari departemen atau unit kerja terkait untuk menjelaskan proses, produk,

The Internal Audit Work Unit (SKAI) is committed to providing independent and objective assurance that adds value and contributes to the achievement of the Bank's strategic goals.

The strategy of SKAI is to provide valuable outcomes through assurance activity that supports the Bank's strategy execution and focus on emerging risks, and actionable insights for good customer and business outcomes; to have competent talent with strong business knowledge, auditing skill sets, and ability to collaborate effectively; and fit for purpose methodology and tools through an audit methodology consistent with regulations, Commonwealth Bank Group's and best practices, and to be equipped with technology that fit to the Bank's need and characteristics.

As of 31 December 2021, the SKAI has 17 members.

Chief of Audit Profile

Reza HM Soemadipradja joined PT Bank Commonwealth as Head of the Internal Audit Unit in July 2011 based on the letter of appointment No. HRPA /8/194/2011.

Qualification/Certification Of SKAI

Throughout 2021, all SKAI members have been certified in the field of banking risk management in accordance with Bank Indonesia regulations. The membership of SKAI includes those from various backgrounds such as accounting firms, banks, and also from other work units with the majority possessing audit experience with expertise and knowledge in certain areas.

Education/Training

SKAI plans and realises programs to improve the quality of skills of its team members through training and development programs that relate to providing exposure and new experiences. This activity is carried out in coordination with the Human Resources directorate.

SKAI also schedules a knowledge transfer program for its team members internally with sharing sessions (i.e. inviting speakers from related departments or work units to explain processes, products, and risks in their work

dan risiko dalam unit kerjanya) maupun program sertifikasi, dan jika diperlukan. SKAI juga berkoordinasi dengan unit Audit & Assurance Commonwealth Bank of Australia (CBA), Sydney terkait dengan program alih pengetahuan melalui auditor tamu maupun diksusi terkait best practice aktivitas audit. Di tahun 2021, SKAI telah berpartisipasi dalam 58 pelatihan.

Tugas dan Tanggung Jawab SKAI

SKAI adalah fungsi yang secara independen dan objektif memberikan assurance kepada Direksi dan Dewan Komisaris melalui Komite Audit terhadap efektivitas operasional tata kelola, manajemen risiko, dan sistem pengendalian internal Bank.

Dalam melaksanakan tugas dan tanggung jawabnya, SKAI mengacu pada Peraturan Otoritas Jasa Keuangan (POJK) No. 1/ POJK.03/2019 tentang Penerapan Fungsi Audit Intern pada Bank Umum, Standar Praktik Profesional dari the Institute of Internal Auditors (IIA), dan Piagam Audit Intern yang menjelaskan visi, misi, wewenang, dan tanggung jawab SKAI.

Piagam dan Panduan SKAI

SKAI memiliki Piagam Audit Internal (Internal Audit Charter) yang memuat visi, misi, wewenang, dan tanggung jawab SKAI. Panduan Audit Intern (Internal Audit Manual) yang dimiliki SKAI memuat pendekatan dan metodologi dalam melakukan audit. Panduan Audit Intern dikaji ulang secara berkala dan diperbarui dengan mempertimbangkan kebutuhan audit.

Pelaksanaan Tugas SKAI

SKAI menggunakan pendekatan berdasarkan risiko (risk-based) dalam penyusunan rencana audit tahunan maupun pelaksanaan penugasan audit.

Temuan-temuan utama SKAI secara berkala dilaporkan kepada Dewan Komisaris dan Direksi melalui Rapat Dewan Komisaris dan Rapat Manajemen. Selain itu, seluruh temuan audit juga dilaporkan setiap semester kepada Otoritas Jasa Keuangan (OJK) melalui Laporan Pelaksanaan dan Pokok-Pokok Hasil Audit Intern (LPPHA).

Secara berkesinambungan, SKAI melakukan pemantauan atas pencapaian rencana audit serta risiko-risiko yang muncul (*emerging risks*). Hal ini dilakukan sehingga dari waktu ke waktu sehingga SKAI dapat mengevaluasi rencana audit di tahun berjalan dan melakukan perubahan jika diperlukan.

Sistem Pengendalian Internal

Sistem pengendalian internal Bank dilakukan melalui kerangka Tiga Lini Akuntabilitas. Secara umum, SKAI selaku Lini 3 bertindak sebagai penilai independen atas efektivitas sistem pengendalian internal yang

units) as well as certification programs, as needed. SKAI also coordinates with the Audit & Assurance unit of the Commonwealth Bank of Australia (CBA) regarding transfer of knowledge through guest auditors and discussions regarding best practice audit activities. In 2021, SKAI participated in 58 training sessions.

SKAI Duties and Responsibilities

SKAI is a function that provides independent and objective assurance to the Board of Directors and the Board of Commissioners through the Audit Committee regarding the effectiveness of the Bank's execution of governance, risk management, and internal controls framework.

In carrying out its duties and responsibilities, the SKAI refers to the Financial Services Regulation (POJK) No. 1/ POJK.03/2019 on the Implementation of Commercial Bank Internal Audit Functions, Professional Practice Standards from the Institute of Internal Auditors (IIA), and the Internal Audit Charter that describes the vision, mission, authorities, and responsibilities of the SKAI.

Internal Audit Charter & Manual

The SKAI has an Internal Audit Charter that contains SKAI's vision, mission, authority, and responsibilities. The Internal Audit Manual contains approaches and methodologies in conducting audits. The Internal Audit Manual is regularly reviewed and updated with consideration of audit requirements.

Implementation of SKAI Duties

The SKAI uses a risk-based approach in the preparation of the annual audit plan and the execution of audit assignments.

The main findings of the SKAI are regularly reported to the Board of Commissioners and Board of Directors through Board of Commissioners Meetings and Management Meetings. In addition, all of the audit findings are also reported every semester to the Financial Services Authority (OJK) through the Implementation Report and Principles of Internal Audit Results (LPPHA).

The SKAI continuously monitors the achievement of the audit plan as well as the emerging risks. This is done so that from time to time the SKAI can evaluate the audit plan in the current year and make changes if necessary.

Internal Control System

The Bank's Internal Control System is executed through the Three Lines of Accountability framework. In general, SKAI acts as an independent assessor on the effectiveness of the internal control system conducted

dilakukan oleh Lini 1 dan 2 dengan menjalankan rencana tahunan audit yang telah disetujui oleh Direktur Utama dan Dewan Komisaris melalui Ketua Komite Audit.

Tinjauan Atas Efektivitas Sistem Pengendalian Internal – Lini 3

Efektivitas sistem pengendalian internal dilakukan di tiap lini akuntabilitas (*line of accountability*). SKAI selaku Lini 3 melakukan penilaian efektivitas sistem pengendalian internal melalui aktivitas audit berbasis risiko. Penilaian tersebut terdokumentasi dalam kertas kerja dan laporan SKAI. Per tanggal 31 Desember 2021, SKAI telah neemelaksanakan seluruh audit yang direncanakan untuk tahun 2021. Audit yang dijalankan mengacu pada rencana audit tahunan yang telah didiskusikan dan disetujui oleh Direktur Utama dan Dewan Komisaris melalui Komite Audit.

Untuk memastikan bahwa komitmen audit telah dilaksanakan dengan sesuai secara tepat waktu oleh unit bisnis, maka Audit Internal melakukan pemantauan secara rutin. Temuan-temuan utama SKAI secara berkala dilaporkan kepada Dewan Komisaris dan Direksi melalui Rapat Dewan Komisaris dan Rapat Manajemen.

Struktur dan Kedudukan SKAI

Kepala SKAI diangkat dan diberhentikan oleh Presiden Direktur dengan persetujuan Dewan Komisaris. Kepala SKAI melapor langsung kepada Presiden Direktur dan memiliki jalur komunikasi dengan Dewan Komisaris melalui Komite Audit.

by Lines 1 and 2 in the framework. This is performed by carrying out an annual audit plan approved by the President Director and the Board of Commissioners through the Chairman of the Audit Committee.

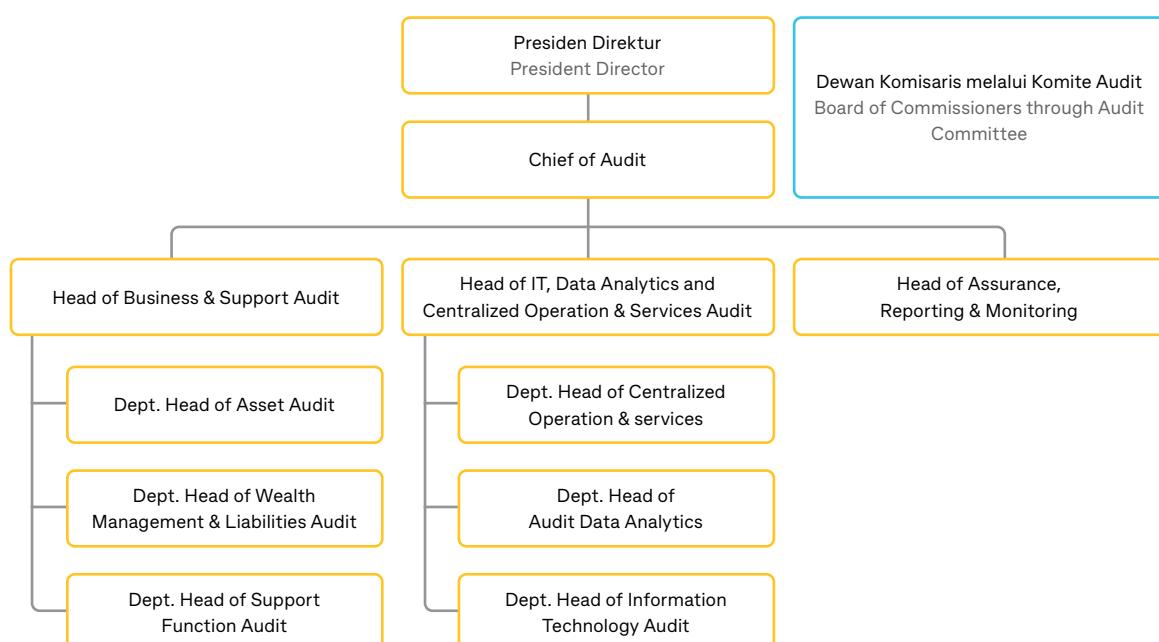
Review of Internal Control System Effectiveness

The effectiveness of the internal control system is conducted on every line of accountability. SKAI as the third Line of Accountability evaluates the effectiveness of the internal control system through risk-based audit activities. The assessment is documented in work papers and SKAI reports. As of 31 December 2021, SKAI has carried out all of the audits planned for 2021. The conducted audit refers to the annual audit plan discussed and approved by the President Director and the Board of Commissioners through the Audit Committee.

To ensure audit commitments are realised accordingly in a timely manner by the business units, the Internal Audit conducts regular monitoring. SKAI's main findings are regularly reported to the Board of Commissioners and Board of Directors through Board of Commissioners and Management Meetings.

Structure and Position of the Internal Audit Function

The Head of SKAI is appointed and dismissed by the President Director with the approval of the Board of Commissioners. The Head of the function reports directly to the President Director and has a line of communication with the Board of Commissioners through the Audit Committee.



Benturan Kepentingan

Conflict of Interest

Bank memiliki Kebijakan Manajemen Konflik, Prosedur Manajemen dan Prosedur *Outside Business Interest* yang merupakan acuan dalam penanganan, pencegahan dan pengelolaan konflik termasuk pengungkapannya guna menghindari terjadinya benturan kepentingan.

Selama tahun 2021 tidak terdapat laporan transaksi adanya benturan kepentingan.

The Bank has a Conflict Management Policy, Management Procedure and Outside Business Interest Procedure that serves as a reference in the handling, prevention, and management of conflict including disclosure in order to avoid conflicts of interest.

In 2021, there were no reports of any transactions with a conflict of interest.

Fungsi Kepatuhan

Compliance Function

Organisasi Fungsi Kepatuhan

Fungsi kepatuhan merupakan salah satu komponen penting dalam pelaksanaan GCG. Fungsi kepatuhan dilakukan oleh Satuan Kerja Kepatuhan yang merupakan satuan kerja yang independen dari unit kerja operasional. Satuan Kerja Kepatuhan bertanggung jawab langsung kepada Direktur Kepatuhan. Pengangkatan Direktur Kepatuhan telah dilakukan sesuai dengan ketentuan dan mendapatkan persetujuan OJK.

The Organisation of Compliance Function

The Compliance function is one of the most important components in GCG implementation. The Compliance function is overseen by the Compliance work unit, an independent work unit from the Bank's operational work units. The Compliance function reports directly to the Director of Compliance, Legal & Corporate Secretary. The appointment of the Director of Compliance, Legal & Corporate Secretary has been made according to applicable regulations and has obtained regulatory approval from OJK.

Direktur Kepatuhan bertanggung jawab langsung kepada Presiden Direktur dan tidak membawahi unit-unit kerja yang diperkenankan sebagaimana yang diatur dalam Peraturan OJK No. 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum. Sejak Januari 2021, Direktur Kepatuhan selain membawahi Satuan Kerja Kepatuhan juga membawahi unit kerja Legal dan Corporate Secretary. Posisi Direktur Kepatuhan saat ini dijabat oleh Yessika Effendi.

The Director of Compliance, Legal & Corporate Secretary reports directly to the President Director and does not supervise work units as prohibited by OJK Regulation No. 46/POJK.03/2017 dated 12 July 2017 concerning the Implementation of Commercial Bank Compliance Function. As of January 2021 the Compliance Director also supervises the Legal work unit and Corporate Secretary function. The position of the Director of Compliance, Legal & Corporate Secretary is currently held by Yessika Effendi.

Struktur Organisasi Fungsi Kepatuhan

Direktorat Kepatuhan Bank dibagi menjadi tiga fungsi yaitu:

1. Compliance Advisory

Fungsi Compliance Advisory meliputi komunikasi dengan regulator, memberi saran/rekomendasi kepatuhan dan mengkaji rancangan produk/layanan/kebijakan/prosedur guna memastikan

The Organisation Structure of Compliance Function

Directorate of Compliance of the Bank consists of three functions:

1. Compliance Advisory

The Compliance Advisory function includes communicating with regulators, giving advice/recommendations on compliance and reviewing product/service/policy/procedure designs to

kebijakan Bank telah sesuai dengan peraturan dan perundang-undangan serta memastikan kepatuhan komitmen Bank kepada regulator.

2. APU/PPT dan Sanksi

Fungsi APU/PPT dan Sanksi bertanggung jawab terhadap penerapan program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU/PPT) dan memastikan transaksi keuangan dan perdagangan internasional sesuai dengan ketentuan *Sanctions* yang berlaku, serta memberikan pelatihan kepada karyawan terkait penerapan APU/PPT dan kebijakan *Sanctions* Bank.

3. Compliance governance and Assurance

Fungsi ini bertanggung jawab terhadap aktivitas Assurance Lini 2 dan memberikan opini independen terhadap kesesuaian, identifikasi, dan efektivitas pengelolaan risiko kepatuhan yang dijalankan oleh Lini 1. Selain itu, fungsi ini juga bertanggung jawab terhadap penyusunan, pemeliharaan dan pelaksanaan kebijakan yang mendukung pelaksanaan Kode Etik Bank seperti Anti Suap dan Korupsi (AB&C), Manajemen Konflik, Hadiah dan Hiburan, dan *Dealing with Related Parties*.

Penerapan Fungsi Kepatuhan

Pelaksanaan fungsi kepatuhan 2021 telah dilakukan melalui kegiatan-kegiatan yang mencakup:

1. Melakukan kajian kepatuhan (*compliance review*) guna memastikan bahwa produk, layanan, kebijakan dan prosedur Bank tidak bertentangan dengan peraturan perundang-undangan. Satuan Kerja Kepatuhan telah melakukan kajian terhadap produk, layanan, kebijakan dan prosedur baru maupun pembaruan yang dilakukan selama tahun 2021.
2. Melakukan pemantauan pemenuhan *regulatory parameter* utama Bank antara lain rasio BMPK, GWM, NPL, PDN, dan CAR. Selama tahun 2021 tidak terdapat pelanggaran *regulatory parameter* utama. Pemantauan juga dilakukan terhadap komitmen atas hasil pemeriksaan regulator dan seluruh komitmen telah ditindaklanjuti sesuai dengan target yang disepakati Bank dan regulator.
3. Melakukan diseminasi peraturan baru atau perubahan kepada unit kerja yang relevan dan mengidentifikasi kewajiban (*compliance obligation*) atas peraturan serta memastikan kecukupan kontrol yang tersedia pada unit-unit kerja yang relevan dalam memenuhi *obligation* atas peraturan. Satuan Kerja Kepatuhan juga menerbitkan prosedur manajemen obligation sebagai acuan dalam pelaksanaannya.

ensure the Bank's policies are in accordance with applicable legislation and regulation as well as ensuring the Bank remains in compliance with its commitments to regulators.

2. AML/CTF and Sanctions

The AML/CTF and Sanctions function has the responsibility for implementing the Bank's Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) programme and ensuring that International Financial and Trade transactions are processed in accordance with the applicable Sanctions policy, as well as providing training to employees regarding the implementation of the Bank's AML/CTF and Sanctions policies.

3. Compliance governance and Assurance

This function is responsible for Assurance Line 2 activities and provides independent opinions on the identification, suitability, and effectiveness of compliance risk management conducted by Line 1. Moreover, this function is also responsible for the formulation, maintenance and implementation of policies that support the implementation of the Bank's Code of Ethics such as Anti-Bribery and Corruption (AB&C), Conflict Management, Gifts and Entertainment, and Dealing with Related Parties.

Implementation of Compliance Function

The implementation of the compliance function in 2021 was realised through the activities that include:

1. Reviewing compliance assessments in order to ensure that the Bank's products, services, policies and procedures have not violated any legislation. The Compliance function conducted a review on new products, services, policies, and procedures as well as updates that were done throughout 2021.
2. Monitoring the fulfilment of the Bank's main regulatory parameters, including the LLL, Statutory Reserves, NPL, PDN, and CAR ratios. As of 31 December 2021, no major regulatory parameter violations were identified. Monitoring is also carried out on commitments to the results of the regulator's examination and all commitments have been followed up in accordance with the targets agreed by the Bank and regulators.
3. Disseminating new regulations or changes to relevant work units and identifying compliance obligations with regulations, and ensuring the adequacy of available controls in relevant work units in fulfilling regulatory obligations. The Compliance function also issued Obligations Management procedures as a reference for its implementation.

4. Menjalankan fungsi pengawasan risiko *Financial Crime* dan *Regulatory Licensing Obligation* dan aktivitas *Assurance Lini 2*, serta pemantauan terhadap penyelesaian tindak lanjut isu berdasarkan hasil *Assurance lini 2* pada Direktorat Kepatuhan.

Anti Pencucian Uang/Pencegahan Pendanaan Terorisme (APU/PPT)

Dalam menjalankan kegiatan usahanya, Bank berkomitmen untuk mencegah agar produk dan layanannya tidak digunakan sebagai sarana pencucian uang dan pendanaan terorisme dengan menerapkan program APU/PPT yang sesuai dengan undang-undang dan peraturan perbankan yang berlaku, yaitu:

- UU No. 8 tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang;
- UU No. 9 tahun 2013 tentang Pencegahan dan Pemberantasan Tindak Pidana Pendanaan Terorisme;
- Peraturan OJK No. 12/POJK.01/2017 tentang Penerapan Program APU/PPT di Sektor Jasa Keuangan;
- Surat Edaran OJK No. 32/SEOJK.03/2017 tentang Penerapan Program APU/PPT di Sektor Perbankan; dan
- Peraturan OJK No. 23/POJK.01/2019 tentang Perubahan atas Peraturan OJK No. 12/POJK.01/2017 tentang Penerapan Program APU/PPT di Sektor Jasa Keuangan.

1. Pengawasan Aktif Direksi dan Dewan Komisaris

Pengawasan aktif Direksi dan Dewan Komisaris dilaksanakan dengan pengesahan Kebijakan APU/PPT Bank dan pemantauan atas penerapan program APU/PPT. Informasi manajemen dilaporkan secara berkala kepada Direksi dan Dewan Komisaris terkait kegiatan APU/PPT terbaru, rencana aksi, dan kemajuan terkait pengembangan sistem serta pelaporan perundang-undangan.

2. Kebijakan dan Prosedur

Dalam rangka mendukung pengembangan usaha dan kegiatan transaksi, Bank Commonwealth memiliki kebijakan dan prosedur yang mengatur pelaksanaan program APU/PPT sesuai dengan persyaratan perundang-undangan yang berlaku. Kebijakan dan prosedur ini diperbarui secara berkala untuk memastikan keakuratannya, sesuai dengan perubahan dalam lanskap regulasi dan praktik bisnis.

3. Pengendalian Internal

Pengendalian internal merupakan bagian penting dari upaya Bank untuk memastikan efektivitas penerapan

4. Carrying out the function of monitoring the risk of Financial Crime and Regulatory Licensing Obligations and Assurance Line 2 activities, as well as monitoring the resolution of follow-up issues based on the results of Line 2 assurance at the Compliance Directorate.

Anti Money Laundering/Counter-Terrorism Funding (AML/CTF)

In conducting its business activities, the Bank is committed to preventing its products and services from being used as a medium for money laundering and terrorism funding. The Bank implements the AML/CTF programs that are in accordance with prevailing laws and banking regulations, namely:

- Law No. 8 of 2010 on the Prevention and Eradication of the Crime of Money Laundering;
- Law No. 9 of 2013 on the Prevention and Eradication of the Crime of Terrorism Financing;
- Financial Services Authority Regulation No. 12/POJK.01/2017 on the Implementation of AML/CTF Program for the Financial Services Sector;
- Financial Services Authority Circular Letter No. 32/SEOJK.03/2017 on the Implementation of AML/CTF Program for the Banking Sector; and
- Financial Services Authority Regulation No. 23/POJK.01/2019 concerning the amendment to POJK No. 12/POJK.01/2017 on the Implementation of AML/CTF Program for the Financial Services Sector

1. Active Supervision from the Board of Directors and Board of Commissioners

Active supervision by the Board of Directors and the Board of Commissioners is carried out, among others, by way of endorsement of the Bank's AML/CTF Policy and monitoring the implementation of the AML/CTF program. Periodic management information submitted for Board oversight includes updates on AML/CTF activities, action plan and progress related to system development, and the filing of regulatory reports.

2. Policies and Procedures

In an effort to support business development and transactional activities, the Bank has policies and procedures governing the implementation of the AML/CTF program in accordance with applicable regulatory requirements. These policies and procedures are regularly updated to ensure that they remain current, in keeping with changing regulatory landscape and business practices.

3. Internal Control

Internal control forms an integral part of the Bank's efforts to ensure the effectiveness of the AML/CTF

program APU/PPT dalam memenuhi kewajiban perundang-undangannya. Audit Internal melakukan tinjauan berkala atas unit bisnis dan kantor cabang terkait untuk menilai penerapan kebijakan dan prosedur internal yang dirancang untuk memitigasi risiko pencucian uang dan pendanaan terorisme.

4. Sistem Informasi Manajemen

Dalam rangka mengawasi profil dan informasi nasabah, Bank menggunakan aplikasi untuk mengidentifikasi, menganalisis, memantau, dan membuat laporan mengenai karakteristik transaksi yang dilakukan Nasabah, termasuk peringatan apabila ada aktivitas keuangan yang mencurigakan. Sistem ini dilengkapi dengan peraturan dan parameter yang dievaluasi secara terus menerus sesuai dengan tipologi pencucian uang dan pendanaan terorisme yang selalu berubah. Aplikasi ini juga berfungsi untuk melakukan proses screening atas basis data daftar pantauan APU/PPT.

Sejak Februari 2021, setelah serangkaian peningkatan sistem dan pengujian besar-besaran, Bank beralih ke GoAML sebagai platform baru untuk menyampaikan laporan perundang-undangan kepada PPATK.

Pada bulan Oktober 2021, Bank juga telah melibatkan vendor aplikasinya untuk melakukan pemeriksaan kesehatan yang bertujuan untuk meningkatkan kinerja sistem secara keseluruhan, serta memberikan konsultasi tentang penyempurnaan peraturan deteksi pemantauan transaksi Bank.

5. Sumber Daya Manusia dan Pelatihan

Dalam menjalankan fungsinya, Divisi APU/PPT & Sanksi berada di bawah Direktur Kepatuhan. Per tanggal 31 Desember 2021, divisi ini beranggotakan 10 karyawan dengan pengetahuan dan pengalaman perbankan yang memadai di berbagai aliran program APU/PPT, antara lain tata kelola, orientasi nasabah, pemantauan transaksi, pelaporan perundang-undangan, serta pelatihan dan peningkatan kesadaran.

Program pelatihan APU/PPT wajib diikuti oleh seluruh karyawan. Pelatihan dilakukan secara tatap muka (seperti Program Induksi Dasar dan Orientasi untuk *Frontliners*) dan menggunakan metode pembelajaran *e-learning*.

program implementation in meeting its regulatory obligations. Internal Audit performs a periodic review of the relevant business units and branch offices to assess the implementation of internal policies and procedures which have been designed to mitigate the risk of money laundering and terrorist financing.

4. Management information Systems

For the purpose of monitoring customer profiles and transactions, the Bank uses an application to identify, analyse, monitor and provide reports on the characteristics of transactions carried out by customers, including alerts of potentially suspicious financial activities. This system is equipped with rules and parameters that are continuously evaluated in accordance with evolving money laundering and terrorism financing typologies. The application also has a function to screen against AML/CTF watch-list databases.

Since February 2021, following a series of rigorous system enhancement and testing, the Bank has transitioned to the GoAML system as its new platform for filing regulatory reports to INTRAC (PPATK).

In October 2021, the Bank has also engaged its application vendor to perform a health check review with the aim of improving the overall system performance, in addition to providing consultation on fine-tuning the Bank's transaction monitoring detection rules.

5. Human Resources and Training

In carrying out its function, the AML/CTF & Sanctions function reports directly to the Director of Compliance. As of 31 December 2021, the division consisted of 10 (ten) employees with extensive banking knowledge and experience across various streams of the AML/CTF program, including governance, customer on-boarding, transaction monitoring, regulatory reporting, and training and awareness.

AML/CTF training programs are mandatory for all employees. Training is delivered through face-to-face (such as the Basic Induction Program and Onboarding for Frontliners) and e-learning methods.

Manajemen Risiko

Risk Management

Kerangka Manajemen Risiko Bank berfokus kepada peningkatan secara keseluruhan kemampuan pengelolaan risiko Bank dan menyelaraskan dengan hasil bisnis yang diharapkan. Untuk mendukung penerapan fungsi-fungsi manajemen risiko, Bank memiliki struktur organisasi memadai yang mencakup Satuan Kerja Manajemen Risiko (SKMR) dan Komite Manajemen Risiko (KMR). SKMR memiliki fungsi yang independen terhadap satuan kerja bisnis dan operasional, Satuan Kerja Kepatuhan (SKK) dan Satuan Kerja Audit Internal (SKAI). Pimpinan tertinggi SKMR bertanggung jawab secara langsung kepada Presiden Direktur Bank. Bank menerapkan prinsip pemisahan fungsi antara satuan kerja pengambil risiko (*risk taking unit*), satuan kerja manajemen risiko (*risk management unit*) dan satuan kerja internal audit (*internal audit unit*). Penerapan prinsip ini dimaksudkan untuk memastikan agar setiap fungsi terbebas dari benturan kepentingan.

Risk Appetite Statement (RAS) menetapkan kerangka kerja bagaimana manajemen risiko diterapkan dalam operasional sehari-hari. RAS adalah dasar dari praktik manajemen risiko yang mengartikulasikan risiko-risiko dalam hal kecukupan modal, menjaga likuiditas, pencapaian target bisnis serta memelihara reputasi dan *franchise value* Bank.

Proses Manajemen Risiko

Bank menjalankan proses manajemen risiko yang memadai yang meliputi identifikasi, pengukuran, pemantauan dan pengendalian risiko. Identifikasi risiko juga dilakukan melalui analisis risiko yang melekat (*inherent risk*), yaitu risiko yang timbul dari produk, layanan dan kegiatan usaha Bank.

Jenis-jenis Risiko dan Pengelolaannya

Bank telah melakukan identifikasi atas risiko-risiko yang dihadapi serta memetakan langkah-langkah mitigasinya sebagai bagian dari identifikasi dan pemahaman profil risiko. Jenis-jenis risiko tersebut adalah:

1. Risiko Kredit
2. Risiko Pasar
3. Risiko Likuiditas
4. Risiko Operasional
5. Risiko Hukum
6. Risiko Strategis
7. Risiko Reputasi
8. Risiko Kepatuhan

The Bank's Risk Management framework focuses on overall improvement of the Bank's risk management capabilities and aligning them with the desired business outcome. To support the implementation of risk management functions, the Bank has an adequate organisational structure that includes Risk Management Function (SKMR) and Risk Management Committee (KMR). The SKMR is a function independent from the business and operational units, the Compliance Function (SKK) and Internal Audit Function (SKAI). The Bank's Chief of Risk directly reports to the President Director. The Bank applies the principle of segregation of duties between risk taking units, the risk management unit, and the internal audit unit. The application of this principle is intended to ensure that each work function is free from any conflicts of interest.

The Risk Appetite Statement (RAS) sets out the framework for how risk management is incorporated into the Bank's day-to-day operations. The RAS is the foundation of the Bank's risk management practices as it articulates risks in terms of capital adequacy, managing liquidity, achieving business targets and safeguarding reputation and the value of its franchise.

Risk Management Process

The Bank conducts appropriate risk management processes including risk identification, measurement, monitoring and the application of controls. Risk identification is also conducted through inherent risk analysis such as risks arising from the Bank's products, services and business activities.

Types of Risks and Its Management

The Bank has identified types of risks and formulated mitigating action plans as part of the identification and understanding of its risk profile. The types of risks are:

1. Credit Risk
2. Market Risk
3. Liquidity Risk
4. Operational Risk
5. Legal Risk
6. Strategic Risk
7. Reputation Risk
8. Compliance Risk

Tinjauan terhadap Efektivitas Pengelolaan Risiko Bank

Bank memiliki kebijakan dan prosedur penerapan Manajemen Risiko yang memadai dan telah dikenakan secara berkala. Dewan Komisaris dan Direksi melakukan pengawasan aktif terhadap pelaksanaan kebijakan dan strategi Manajemen Risiko melalui Komite Pemantau Risiko dan Komite Manajemen Risiko yang melakukan rapat setiap dua bulan sekali. Bank menetapkan limit risiko untuk setiap jenis risiko yang melekat dalam aktivitas Bank serta melakukan evaluasi dan pemantauan kepatuhan terhadap *Risk Appetite*, toleransi dan limit risiko yang telah ditetapkan. Hasil pemantauan terhadap *Risk Appetite*, toleransi dan limit risiko dilaporkan kepada Komite Manajemen Risiko dan Komite Pemantau Risiko secara berkala. Bank melakukan aktivitas bisnis yang tidak melampaui kemampuan permodalan untuk menyerap risiko kerugian. Kekurangan permodalan dipantau oleh Divisi *Finance* dan SKMR serta dilaporkan secara berkala kepada Direksi dan Dewan Komisaris.

Pernyataan Direksi tentang Kecukupan Pengelolaan Risiko Bank

Pernyataan Direksi tentang Kecukupan Pengelolaan Risiko Bank dapat dilihat pada bagian Tinjauan Fungsional Bab Analisis dan Pembahasan Manajemen Laporan Tahunan ini pada halaman 112.

Overview on the Effectiveness of the Bank's Risk Management

The Bank has adequate Risk Management policies and procedures that are periodically revised. The Board of Commissioners and Board of Directors exercise active supervision over the implementation of Risk Management policies and strategies through meetings of the Risk Oversight Committee and the Risk Management Committee held on a bi-monthly basis. The Bank imposes risk limits for each type of potential risk inherent in the Bank's activities. In addition, the Bank also evaluates and monitors compliance to the Bank's Risk Appetite, tolerances and risk limits. The results of monitoring the Bank's Risk Appetite, tolerances and risk limits are reported to the Risk Management Committee and the Risk Oversight Committee on a regular basis. The Bank also calculates and adapts its business activities with its capital capacity to minimise the risk of loss. Capital adequacy is monitored by the Finance Division and SKMR and is reported periodically to the Board of Directors and Board of Commissioners.

Statement from the Board of Directors on the Sufficiency of Bank Risk Management

Statement from the Board of Directors on the Sufficiency of the Bank's Risk Management can be found in the Functional Review of the Management Discussion and Analysis Chapter of this Annual Report on page 112.

Permasalahan Hukum

Legal Cases

Perkara Hukum yang Dihadapi Dewan Komisaris dan Direksi Bank Commonwealth

Sepanjang 2021, Bank menghadapi sejumlah kasus gugatan perdata dan penundaan kewajiban pembayaran utang (PKPU)/Kepailitan dengan uraian sebagai berikut:

Proses Hukum Legal Process	Jumlah Perkara Total Cases	
	Perdata Civil Cases	
	2020	2021
Sudah selesai (dengan finalisasi hukum dan kekuatan mengikat) Finished (with legal finalisation and binding power)	5	3
Dalam proses penyelesaian in process	9	17
Total	14	20

Legal Cases involving the Board of Commissioners and Board of Directors of the Bank

In 2021, the Bank faced a number of civil lawsuits and suspension of debt payment obligations (PKPU)/Bankruptcy with the following descriptions:

PT Bank Commonwealth sebagai Pihak dalam PKPU/Kepailitan

Proses Hukum Legal Process	Jumlah Perkara Number of Cases		
	PKPU/Kepailitan PKPU/Bankruptcy	2020	2021
Sudah selesai (dengan finalisasi hukum dan kekuatan mengikat) Finished (with legal finalisation and binding power)	-	1	1
Dalam proses penyelesaian In process	8	7	7
Total	8	8	8

Upaya Hukum

Seluruh kasus hukum yang dihadapi oleh Bank memiliki posisi hukum yang kuat bagi Bank, materi gugatan yang diajukan oleh pihak ketiga tidak memiliki dasar hukum yang kuat sehingga tidak mengakibatkan timbulnya risiko hukum yang signifikan bagi Bank.

1. Kasus Selesai (dengan finalisasi hukum dan kekuatan mengikat)

Terdapat 4 (empat) kasus hukum yang telah selesai dan berkekuatan hukum tetap, yaitu:

PKPU / Kepailitan PKPU/Bankruptcy	Perdata - Tingkat I (Pengadilan Negeri) Civil - Level I (State Court)	Perdata - Tingkat Banding (Pengadilan Tinggi) Civil - Appeals (High Court)	Perdata - Tingkat Kasasi (Mahkamah Agung) Civil - Cassation Level (Supreme Court)
1	2	-	1

2. Dalam Proses Penyelesaian

Terdapat 24 (dua puluh empat) kasus hukum yang saat ini masih dalam proses penyelesaian yaitu sebagai berikut:

PKPU / Kepailitan PKPU/Bankruptcy	Proses Perdata Civil Process	Perdata - Tingkat I (Pengadilan Negeri) Civil - Level I (State Court)	Perdata - Tingkat Banding (Pengadilan Tinggi) Civil - Appeals (High Court)	Perdata - Tingkat Kasasi (Mahkamah Agung) Civil - Cassation Level (Supreme Court)
7	17	12	4	1

Sanksi Administratif

Selama 2021, tidak terdapat sanksi material yang dibebankan oleh regulator kepada Bank, anggota Direksi, maupun anggota Dewan Komisaris.

PT Bank Commonwealth as a Party in PKPU/Bankruptcy

Legal Effort

All legal cases that the Bank has engaged in during 2021 have been done with the Bank having a strong legal position, whereby the lawsuits filed by third parties does not have a strong legal basis and therefore has not resulted in significant legal risks for the Bank.

1. Finished Cases (with legal finalisation and binding power)

4 (four) legal cases have been resolved and legally bound, these are:

2. In Process of Resolution

24 (twenty-four) legal cases are currently still in resolution process, as follows:

Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar

Fund Provision to Related Parties and Large Exposures

Bank memiliki Kebijakan dan Prosedur Batas Maksimum Pemberian Kredit (BMPK) dan Kebijakan Dealing with Related Party yang merupakan acuan dalam melakukan penyediaan dana maupun transaksi atau kerja sama dengan pihak-pihak terkait Bank.

The Bank has a Maximum Lending Limit Policy and Procedure (BMPK) and a Dealing with Related Parties Policy which serves as a reference in providing funds and transactions or cooperations with parties related to the Bank.

Penyediaan dana kepada pihak terkait dilakukan secara *arm's length* sesuai dengan kebijakan kredit dan delegasi kewenangan kredit yang berlaku. Bank tidak memiliki eksposur penyediaan dana besar, hal ini sejalan dengan fokus dan strategi bisnis Bank yaitu pada segmen Retail dan SME.

Penyediaan dana kepada pihak terkait Bank posisi pada 31 Desember 2021, sebagai berikut:

Penyediaan Dana Provision of Funds	Jumlah Debitur Number of Debtors	Jumlah (Dalam Jutaan Rupiah) Total (In millions of Rupiah)
Kepada Pihak Terkait / To Related Parties	6	61,246
Penyediaan Dana Besar / Large Exposures	-	-
Debitur Individu / Individual Debtors		
Debitur Grup / Group Debtors		

Provision of funds to related parties is carried out on an arm's length basis in accordance with credit policies and the applicable delegation of credit authority. The Bank does not have exposure to large funds in line with the Bank's focus and business strategy, namely the Bank's target Retail and SME segments.

Provision of funds to related parties of the Bank as of December 31, 2021, was as follows:

Opsi Saham

Stock Options

Bank tidak memberikan opsi saham apa pun kepada anggota Dewan Komisaris, Direksi, dan Pejabat Eksekutif.

The Bank does not provide any stock options to members of the Board of Commissioners, the Board of Directors, and Executive Officers.

Pembelian Kembali Saham dan Obligasi Bank

Buyback of Shares and Bonds

Pada tahun 2021, tidak ada transaksi pembelian kembali saham maupun obligasi.

In 2021, there was no buyback of shares nor bonds.

Transparansi Kondisi Keuangan dan Non-Keuangan

Transparency of Financial and Non-Financial Condition

Bank memiliki kebijakan terkait kewajiban transparansi dan pengungkapan baik kondisi keuangan dan non keuangan yang mengacu pada peraturan OJK dan standar yang berlaku umum.

Bank memberikan akses keterbukaan informasi kepada pemangku kepentingan seperti produk dan layanan, informasi investor, jaringan kantor, laporan keuangan, laporan tahunan, laporan dan pelaksanaan tata kelola dan kegiatan sosial, fakta material dan lainnya pada situs web <https://www.commbank.co.id>. Bank. Informasi keuangan dan non keuangan telah dipublikasikan sesuai peraturan.

The Bank has policies related to transparency and disclosure obligations, both financial and non-financial conditions that refer to OJK regulations and generally accepted standards.

The Bank provides access to information disclosures to stakeholders such as products and services, investor information, office networks, financial reports, annual reports, reports and implementation of governance and social activities, material facts and others on the Bank's website <https://www.commbank.co.id>. Financial and non-financial information has been published according to regulations.

Kode Etik

Code of Conduct

Kode Etik adalah panduan utama kegiatan bagi Bank Commonwealth dan semua unit kerjanya. Kode Etik menggambarkan standar perilaku yang diharapkan yang mengatur cara tiap unit kerja di Bank berinteraksi satu sama lain dan dengan pemangku kepentingan.

Pernyataan Kode Etik

Kode Etik harus dipahami dan ditaati oleh seluruh karyawan, Direksi, dan Dewan Komisaris. Tiap pelanggaran kode etik memiliki konsekuensi sanksi sebagaimana ditetapkan dalam Peraturan Perusahaan.

Pokok-Pokok Kode Etik

Berikut ini nilai-nilai Bank Commonwealth yang merupakan panduan dalam bertindak:

1. *Care*, Bank peduli terhadap nasabah dan sesama, serta memberikan pelayanan dengan kerendahan hati dan keterbukaan.
2. *Courage*, Bank memiliki keberanian untuk turun tangan menyampaikan pendapat (*speak up*) dan memimpin dengan memberikan teladan.
3. *Commitment*, Bank teguh dalam memegang komitmen, melakukan hal yang benar, dan bekerja sama untuk menyelesaikan sesuatu.

Perilaku dan keputusan dilakukan secara konsisten sesuai kebijakan-kebijakan kunci di Bank. Kebijakan kunci Bank dikelompokkan ke dalam tiga (3) kategori, yaitu:

1. Nasabah dan Masyarakat
2. Tata Kelola dan Kendali
3. Sumber Daya Manusia

Sosialisasi dan Penegakan Kode Etik

Sosialisasi Kode Etik dilakukan melalui program pengenalan karyawan (*Induction Program*) yang wajib diikuti oleh seluruh karyawan baru. Selain itu, penyegaran informasi kode etik dilakukan melalui *e-learning* secara berkala kepada seluruh karyawan, anggota Direksi, dan anggota Dewan Komisaris.

The Bank's Code of Conduct is the main guideline for how the Bank and all of its functions operate. The Code of Conduct describes the expected standards of behaviour that govern how each function of the Bank interacts with each other, as well as with its stakeholders.

Code of Conduct Statement

The Code of Conduct must be understood and adhered to by all employees, Board of Directors, and Board of Commissioners. Violation of the Code of Conduct has consequences as stipulated in the Company Regulations.

Specifics of Code of Conducts

The Bank's Values are guidelines for the Bank to act, those values are:

1. Care, the Bank cares for its customers and each other, it serves with humility and openness.
2. Courage, the Bank has the courage to step in and speak up and lead by example.
3. Commitment, the Bank sticks to its commitments, does the right thing and works together to get things done.

Conduct and decisions are carried out consistently in accordance with the Bank's core policies. The Bank's core policies are grouped into 3 (three) categories, which are:

1. Customers and Community
2. Governance and Control
3. Human Resources

Socialisation and Implementation of Code of Conduct

The socialisation of the Code of Conduct is carried out through an employee induction program that is mandatory for all new employees. In addition, the Code of Conduct refreshment is carried out periodically through e-learning for all employees, members of the Board of Directors as well as the Board of Commissioner.

Whistleblowing System

Bank memiliki *Whistleblower Policy* yang mengatur mekanisme penanganan pengaduan *Whistleblower* yang mencakup pengungkapan, penanganan pengaduan, investigasi dan perlindungan. Bank menyediakan saluran komunikasi bagi *Whistleblower* untuk mengungkapkan tindakan atau dugaan terkait pelanggaran kebijakan, korupsi, perilaku tidak etis, penipuan dan tindakan illegal lainnya baik yang dilakukan karyawan Bank maupun pihak-pihak yang terkait dengan Bank.

Kerahasiaan Pelapor (*Whistleblower*)

Bank berkomitmen untuk menjaga kerahasiaan informasi yang diterima melalui saluran *Whistleblower*. Seluruh informasi yang diterima dari *whistleblower* akan diperlakukan secara rahasia dan sensitif oleh Bank termasuk jika *Whistleblower* memberikan identitasnya. *Whistleblower* dapat tidak menginformasikan identitasnya atau anonim dalam membuat pengungkapan.

Perlindungan bagi Pelapor (*Whistleblower*)

Bank memberikan perlindungan kepada pelapor dari tindakan balasan pihak yang dilaporkan dan/atau pihak lain yang berkepentingan. Bank akan mengambil langkah-langkah tegas untuk melindungi pelapor dari tindakan-tindakan merugikan yang dilakukan orang-orang yang terlibat dalam proses investigasi.

Penanganan Laporan

Pengungkapan yang diterima melalui saluran *Whistleblower* akan ditindaklanjuti sesuai kebijakan Bank. Investigasi atas dugaan pelanggaran atau fraud dilakukan oleh tim investigasi internal yang independen. Hasil investigasi akan disampaikan kepada manajemen melalui *People Forum* untuk diputuskan tindak lanjut atau pemberian sanksinya.

Saluran *Whistleblower*

Bank Commonwealth menyediakan sarana pelaporan bagi *Whistleblower* yang dapat dilakukan melalui saluran *Whistleblower*, sebagai berikut:

Email : integrity@commbank.co.id

Hotline *Whistleblower* : 0807 1919 191

Pengungkapan juga dapat dilakukan kepada manajemen (pejabat senior) dan Internal Audit Bank

Pengaduan yang Diterima

Jumlah dan status pengungkapan *Whistleblower* yang diterima selama tahun 2021, sebagai berikut:

The Bank has a Whistleblower Policy which regulates the mechanism for handling Whistleblower complaints which includes disclosure, complaint handling, investigation and protection. The Bank provides a communication channel for Whistleblowers to disclose actions or allegations related to policy violations, corruption, unethical behaviour, fraud and other illegal acts, both committed by Bank employees and parties related to the Bank.

Confidentiality of *Whistleblower*

The Bank is committed to maintaining the confidentiality of information received through the Whistleblower channel. All information received from the whistleblower will be treated confidentially and sensitively by the Bank, including if the whistleblower provides his/her identity. Whistleblowers may remain anonymous in making disclosures.

Protection for *Whistleblower*

The Bank ensures protection of the *Whistleblower* from retaliation by reported parties and/or other parties that have interests. The Bank will take strict actions to protect the *Whistleblower* from any adverse actions from the people involved in the investigation process.

Report Handling

Disclosures received through the Whistleblower channel will be followed up according to the Bank's policy. Investigation of alleged violations or fraud is carried out by an independent internal investigation team. The results of the investigation will be submitted to management through the People Forum for a follow-up decision or the imposition of sanctions.

Whistleblowing Channels

The Bank provides communication channels for whistleblowers as follows:

Email : integrity@commbank.co.id

Whistleblowing Hotline : 0807 1919 191

Disclosure can also be made to management (senior officials) and the Bank's Internal Audit

Complaints Received

Whistleblowing reports received by the Bank in 2021 and their status are as follows:

Status Pengaduan Complaints Status	Total Pengaduan Total Complaints	
	2021	2020
Dalam proses In progress	-	-
Selesai Resolved	8	3
Hanya informasi/tidak ada temuan Merely information/no finding	4	1
Malpraktik Malpractice	4	2
Pelanggaran Violations	-	-
Total Pengaduan Total Complaints	8	3

Penyimpangan Internal

Internal Fraud

Penyimpangan internal (*internal fraud*) merupakan fraud yang dilakukan oleh karyawan, anggota Direksi, dan anggota Dewan Komisaris, karyawan tetap, karyawan tidak tetap dan/ atau tenaga kerja alih daya (*outsourcing*). Selama tahun 2021, tidak terdapat internal fraud yang dilakukan oleh anggota Direksi dan Dewan Komisaris maupun karyawan Bank.

Bank memiliki kebijakan/Prosedur Anti Suap dan Korupsi, Pemberian dan Penerimaan Hadiah dan Hiburan, Manajemen Konflik serta *Outside Business Interest* sebagai bagian dari pencegahan *fraud*.

Internal Fraud is fraud committed by an employee, a member of the Board of Directors and the Board of Commissioners, including permanent, semi-permanent employees, and outsourcing. Throughout 2021, there were no identified internal fraud cases at the Bank.

The Bank has Anti Bribery and Corruption Policy, Gifts and Entertainment Procedure, Conflict Management Policy as well as *Outside Business Interest* Procedure to support the implementation of internal fraud programs.

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Kebijakan Anti Suap dan Korupsi

Anti Bribery and Corruption Policy

Tindakan-tindakan yang dilakukan Bank untuk mengelola dan memitigasi risiko suap dan korupsi antara lain:

1. Menerapkan kebijakan *zero tolerance* terhadap tiap karyawan, anggota Direksi, anggota Dewan Komisaris, dan pihak ketiga yang bertindak untuk dan atas nama Bank untuk tidak terlibat dalam segala jenis tindakan suap dan korupsi
2. Menetapkan limit dan wewenang persetujuan atas pemberian atau penerimaan hadiah dan hiburan serta menetapkan larangan atas hal-hal yang bertentangan dengan regulasi dan peraturan perusahaan.
3. Menciptakan budaya "*Speak Up*" untuk mendorong pelaporan atas dugaan tindakan suap dan korupsi, tanpa harus merasa takut menerima pembalasan.

Actions taken by the Bank to manage and mitigate the risk of bribery and corruption are, among others:

1. Implement Zero Tolerance policy to all the employees, members of the Board of Directors, Board of Commissioners, and third parties acting for or on behalf of the Bank to not be involved in all acts of bribery and corruption.
2. Set the limit and approval authority for the giving or receiving of gifts and entertainment, as well as enforcing prohibition on all matters that go against company regulations.
3. Foster a "*Speak Up*" culture to encourage the reporting of suspected Bribery and Corruption, without fear of retaliation.

4. Meningkatkan kesadaran seluruh jajaran Bank mengenai program Antisuap dan korupsi dengan memberikan pelatihan wajib serta mengkomunikasikan prinsip *zero tolerance* terhadap tindakan suap dan korupsi secara berkala.
5. Menciptakan kontrol dan pengawasan atas pelaksanaan program-program Anti suap dan korupsi serta memberikan sanksi yang tegas atas pelanggaran.
4. Raise awareness in all levels of the Bank on Anti Bribery and Corruption by providing mandatory training as well as periodically communicating Zero Tolerance principles on Bribery and Corruption.
5. Establish control and supervision on the implementation of Anti Bribery and Corruption programs and give strict sanctions to any violation.

Kebijakan Pemberian dan Penerimaan Hadiah dan Hiburan

Bank menyadari bahwa pemberian dan/atau penerimaan hadiah dan hiburan merupakan bagian dalam membina relasi bisnis, baik dengan nasabah, pihak ketiga, maupun pemangku kepentingan lainnya. Oleh karena itu, Bank perlu menetapkan batasan-batasan yang berlaku kepada seluruh karyawan dalam memberikan dan/atau menerima hadiah dan hiburan, berdasarkan Pakta Integritas, tanggung jawab, dan etika bisnis yang sehat.

Pemberian dan/atau penerimaan hadiah dan hiburan harus mendapatkan persetujuan dari pejabat yang berwenang dan dilaporkan pada sistem pelaporan internal Bank.

Gifts and Entertainment Policy

The Bank understands that the giving and/or receiving of gifts and entertainment is part of building relations both business or otherwise, with the customers, third parties, as well as other stakeholders. Therefore, the Bank needs to establish boundaries that are applicable to all levels of employees in the giving and/or receiving of gifts and entertainment, based on the Integrity Pact, responsibility, and sound business ethics.

The giving and/or receiving of gifts and entertainment must receive approval from authorised officials and reported in the Bank's internal reporting system.

Dana untuk Kegiatan Sosial dan Politik

Funds for Social and Political Activities

Kegiatan Sosial

Bank secara aktif melakukan kegiatan sosial melalui berbagai program dan kegiatan dalam kerangka Tanggung Jawab Sosial Perusahaan (*Corporate Social Responsibility/CSR*). Bank memfokuskan kegiatan sosialnya di bidang edukasi literasi keuangan dan pengembangan sosial. Rincian alokasi dana untuk kegiatan sosial dapat dilihat di bab Ikhtisar Keberlanjutan dan sub bab Kinerja Sosial dalam Laporan Keberlanjutan Bank 2021 yang menyertai Laporan Tahunan ini di halaman 270 dan 294.

Social Activities

The Bank actively conducts social activities through programmes and activities under its corporate social responsibility. The Bank focuses its social activities in the field of financial literacy education and social development. Fund allocation for social activities is detailed in the Sustainability Overview chapter and Social Performance sub chapter of the Bank's 2021 Sustainability Report that accompanies this Annual Report on pages 270 and 294.

Kegiatan Politik

Bank tidak memberikan donasi untuk kegiatan yang berhubungan dengan politik, tidak terlibat dalam kegiatan politik, dan tidak terlibat dengan partai politik tertentu.

Political Activities

The Bank does not donate to any politically-related activity, is not involved in any political activity, nor is it associated with any political party.

Rencana Strategis Bank

Rencana strategis Bank didasarkan pada tujuan Bank yang dirumuskan sebagai arah kebijakan utama dalam mencapai pertumbuhan bisnis yang sejalan dengan fokus bisnis Bank. Bank secara konsisten melaksanakan strateginya dengan fokus pada segmen Ritel dan UKM serta melanjutkan perkembangan infrastruktur digital dalam pelaksanaan strategi Bank.

Bank Strategic Plan

The Bank's Strategy is based on its Purpose as the main guidance to achieve business growth in line with its business focus. The Bank has been consistently executing its strategy, by focusing on the Retail and SME customer segments and enhancing its digital infrastructure to support the implementation of the Banks's strategy.

Rencana Jangka Pendek dan Menengah

Bank akan terus melakukan transformasi model bisnis untuk menjadi lebih berpusat pada nasabah, untuk melayani nasabah dengan lebih baik berdasarkan Proposisi Nilai. Pengembangan Kapabilitas Digital akan terus berlanjut untuk mendukung Bank mencapai *purpose*-nya, yaitu "*Building a brighter future for all*".

Untuk mencapai tujuannya, Bank telah menerapkan kerangka strategi yang meliputi Nilai, Pendekatan Strategis, Kapabilitas yang Mendukung, serta target strategis jangka pendek dan menengah, yang dipantau secara ketat oleh manajemen senior dengan selalu memerhatikan dan menyesuaikan dengan kondisi makro dan pasar terkini.

Bank menetapkan strategi sesuai tujuan jangka pendek dan menengah, yang mencakup:

- i) percepatan akuisisi nasabah untuk mencapai pertumbuhan;
- ii) pengalihan akuisisi dan interaksi nasabah ke kanal digital, seperti CommBank Mobile dan aplikasi CommBank SmartWealth;
- iii) menjadi *Employer of Choice*;
- iv) mempertahankan dan meningkatkan tingkat kepuasan nasabah dengan menggunakan *Net Promoter Score (NPS)* dan peringkat *Banking Service Excellence Monitor (BSEM)* dari MRI sebagai ukuran kepuasan dan kesetiaan nasabah; dan
- v) terus menjaga kondisi keuangan yang sehat dan berkelanjutan.

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Kebijakan Remunerasi

Remuneration Policy

Kebijakan Remunerasi Bank memberikan kerangka kerja untuk memperkuat tata kelola dan akuntabilitas atas pengaturan remunerasi bagi seluruh individu di Bank.

Kebijakan ini dirancang sebagai acuan dalam pelaksanaan pengaturan remunerasi yang tepat untuk mendukung pengelolaan risiko yang kuat, mendorong hasil nasabah yang baik dan mengurangi kemungkinan terjadinya reputasi yang buruk.

Kebijakan ini berlaku bagi anggota Direksi, seluruh karyawan dan individu-individu yang ditetapkan dalam kebijakan. Kebijakan Remunerasi dikaji ulang setiap tahun.

Remunerasi Bank disusun dengan memerhatikan tanggung jawab suatu peran, kompetensi individu, faktor relativitas internal dan faktor daya saing eksternal. Bank mengelola faktor relativitas internal untuk memastikan bahwa penghargaan diberikan secara adil.

Short and Medium-Term Plan

The Bank will continue to execute its Business Model Transformation to be more Customer-Centric, and to serve its customers better in line with target value propositions. Development of the Bank's digital capabilities will be continued into the future to enable the Bank to achieve its purpose of "Building a brighter future for all".

In order to achieve its Objectives, the Bank has implemented a Strategy Framework that incorporates the Bank's Values, Strategic Approach, Enabling Capabilities, and short and medium-term strategic targets. This is closely monitored by senior management and adjusted based on prevailing macro and market conditions.

The Bank sets its Strategy with short term and medium term goals including:

- i) accelerating customer acquisition to achieve growth;
- ii) shifting customer acquisition and engagement to digital channels such as the CommBank Mobile and CommBank SmartWealth apps;
- iii) becoming an Employer of Choice;
- iv) maintaining and increasing the level of customer satisfaction by using the Net Promoter Score (NPS) and the Banking Service Excellence Monitor (BSEM) rating from MRI as a measure of customer satisfaction and loyalty; and
- v) continuing to maintain a sound and sustainable financial condition.

Bank's Remuneration Policy provides a framework for strong governance and accountability over remuneration arrangements for all individuals in the Bank.

This Policy is designed for the appropriate implementation and execution of remuneration arrangements to meet regulatory obligations, support strong risk management, promote good customer outcomes and reduce the likelihood of reputational damage.

The Policy applies to members of the Board of Directors, all employees and any other individuals specified by the policy. The Remuneration Policy is reviewed annually.

Bank remuneration is structured by taking into account the responsibilities of employees' roles, individual competencies, internal relativities and external competitiveness. The Bank manages internal relativities to ensure that incentives and rewards are distributed equitably.

Bank mendukung pengelolaan risiko yang disiplin dalam menjalankan dan mengukur penilaian kinerja jangka pendek dan jangka panjang dengan menghubungkan hasil atas pengelolaan risiko dan kepatuhan dan tidak adanya pelanggaran dengan hasil Remunerasi Variabel.

Struktur remunerasi dan kinerja bagi *Controlled Personnel* (Karyawan dalam fungsi pengawasan) tidak boleh memengaruhi independensi terhadap perannya dalam melaksanakan fungsi pengawasan. *Controlled Personnel* merupakan karyawan pada satuan kerja Manajemen Risiko, Kepatuhan, Audit Internal (SKAI), dan *Financial Control*.

Remunerasi Direksi dan Dewan Komisaris

Struktur remunerasi yang diberikan kepada Dewan Komisaris dan Direksi meliputi:

- Remunerasi dalam bentuk non-natura, termasuk gaji dan penghasilan tetap lainnya antara lain tunjangan, kompensasi berbasis saham, dan bentuk remunerasi lainnya; dan
- Fasilitas lain dalam bentuk natura/non-natura yaitu penghasilan tidak tetap lainnya, termasuk tunjangan perumahan, transportasi, asuransi kesehatan, dan fasilitas lainnya yang dapat dimiliki maupun tidak dapat dimiliki.

Jenis Remunerasi dan Fasilitas Lain Types of Remuneration and Other Facilities	Jumlah Diterima di Tahun 2021*			
	Total Received in 2021			
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Jumlah Direksi Number of Directors	Dalam Juta Rp (Bruto) In Million Rupiah (Gross)
Remunerasi (gaji, bonus, tunjangan rutin, dan fasilitas lainnya dalam bentuk non-natura) Remuneration (salary, bonus, allowances, and other non-natural facilities)	2	4.877	6	39.897 (1 BOD berakhir hubungan kerja dengan Bank di 31 Jan 2021)
Fasilitas lain dalam bentuk natural (perumahan, transportasi, asuransi kesehatan dan sebagainya) yang: Other non-natural facilities (housing, transportation, health insurance, and others) that:	2	878	6	1.796 (1 BOD berakhir hubungan kerja dengan Bank di 31 Jan 2021)
a. Dapat dimiliki Can be owned b. Tidak dapat dimiliki Cannot be owned				
Total	2	5.756	6	41.693 (1 BOD berakhir hubungan kerja dengan Bank di 31 Jan 2021)

* Jumlah ini termasuk Director of Retail & SME Business yang mengundurkan diri efektif 31 Januari 2021
This number includes Director of Retail & SME Business resigned effective 31 January 2021

Remunerasi yang diterima anggota Dewan Komisaris dan Direksi berdasarkan tingkat penghasilan selama tahun 2021 adalah:

Bank promotes disciplined management of risk in delivering and measuring short-term and long-term performance by linking risk and compliance outcomes and conduct to Variable Remuneration outcomes.

The remuneration and performance structure for *Controlled Personnel* (employees in control functions) must not compromise the independence of these roles. *Controlled Personnel* includes employees whose roles are in Risk Management, Compliance, Internal Audit (SKAI), and Financial Control.

Remuneration of Board of Director and Board of Commissioner

The remuneration structure provided to the Bank's Commissioners and Directors includes:

- Remuneration in the form of non-natural means, including salaries and other fixed income, such as allowances, stock-based compensation, and other forms of remuneration; and
- Other facilities in the form of natural/non-natural means namely non-fixed income, such as housing, transportation, health insurance, and other facilities – be it those that can be owned or otherwise.

The remuneration received by members of the Board of Commissioners and the Board of Directors based on the level of income during 2021 is:

Remunerasi per orang dalam satu tahun di 2021 Remuneration per person in one year in 2021	Jumlah Komisaris Number of Commissioners	Jumlah Direksi Number of Directors
Di atas Rp3 miliar Above Rp 3 billion	-	5
Di atas Rp2 miliar – Rp3 miliar*) Above Rp 2 billion – Rp 3 billion*)	2	-
Di atas Rp1 miliar – Rp2 miliar Above Rp 1 billion – Rp 2 billion	-	-
Di atas Rp500 juta – Rp1 miliar Above Rp 500 million – Rp 1 billion	-	-
Di bawah Rp500 juta**) Below Rp 500 million**)	-	-
	-	1

*) Remunerasi Dewan Komisaris hanya untuk Komisaris lokal
*) Board of Commissioner Remuneration only applies for Local Commissioner
**) Remunerasi proporsional atas berakhirnya masa kerja di Bank
** Proportional Remuneration due to end of term of service in the Bank

Remunerasi Bersifat Variabel

Variable Remuneration

Bank memberikan remunerasi yang bersifat variabel dalam bentuk *Sign on Award* (untuk karyawan baru di tingkat jabatan atau pada kondisi tertentu), Bonus Kinerja Tahunan, *Sales Incentive Performance (SIP)* dan Skema Retensi.

Jumlah Direksi, Dewan Komisaris dan karyawan yang menerima remunerasi bersifat variabel selama satu tahun beserta nominalnya adalah sebagai berikut:

Bank provides variable remuneration in the form of Sign on Awards (for new employees based on the position or under certain conditions), Annual Performance Bonuses, Sales Incentive Performance (SIP) and Retention Scheme.

The number of members of the Board of Directors and the Board of Commissioners as well as employees who received variable remunerations and their nominal for one year are as follows:

Remurasi Bersifat Variabel Variable Remuneration	Direksi Board of Directors		Dewan Komisaris Board of Commissioners		Karyawan Employees		Jumlah Total	
	Orang Number of People	Dalam Juta Rp In Millions of Rupiah	Orang Number of People	Dalam Juta Rp In Millions of Rupiah	Orang Number of People	Dalam Juta Rp In Millions of Rupiah	Orang Number of People	Dalam Juta Rp In Millions of Rupiah
Total	6	12.989	2	0	1.048	38.529	1.056	51.518

Jabatan dan Jumlah Material Risk Taker

Posisi-posisi yang dianggap menjadi *Material Risk Taker* terdiri dari:

Positions and Number of Material Risk Takers

Positions deemed as Material Risk Takers consist of:

No	Jabatan Position
1	President Director
2	Director of Compliance, Legal and Corporate Secretary
3	Director of Operations, Information Technology & Finance
4	Director of Digital & Strategy
5	Director of Human Resources
6	Director of Retail & SME Business*

* Director of Retail & SME Business mengundurkan diri efektif 31 Januari 2021

Director of Retail & SME Business resigned effectively 31 January 2021

Rasio Gaji di Lingkup Perusahaan

Informasi mengenai rasio gaji Dewan Komisaris, Direksi, dan karyawan Perusahaan adalah sebagai berikut:

Perbandingan Comparison	Rasio Ratio
Direktur Utama terhadap Direktur President Director to Director	1.51 : 1
Komisaris Utama terhadap Anggota Dewan Komisaris President Commissioner to Members of the Board of Commissioners	N/A*
Direktur Utama terhadap Karyawan tertinggi President Director to the highest employees	1.15 : 1
Direktur Utama terhadap Karyawan terendah President Director to the lowest employees	147 : 1
Karyawan Tertinggi terhadap Karyawan Terendah Highest Employee to Lowest Employee	127 : 1
Karyawan Terendah terhadap UMP Lowest employee against UMP (Provincial Minimum Wage)	1.66 : 1

* Komisaris utama terhadap Anggota Dewan Komisaris merupakan perwakilan dari pemegang saham pengendali di mana remunerasi, termasuk penggajian tidak ditanggung oleh PT Bank Commonwealth
President Commissioner of the Board of Commissioners is a representative of the controlling shareholders, where remuneration, including payroll, is not covered by PT Bank Commonwealth.

Informasi Pemutusan Hubungan Kerja

Jumlah karyawan yang diputus hubungan kerjanya berjumlah 10 orang, dengan total pesangon yang dibayarkan sebesar Rp2,0 miliar.

Salary Ratio in Company Scope

Information regarding the salary ratios for the Board of Commissioners, Directors and employees of the Company are as follows:

Jumlah Nominal Kompensasi yang Dibayarkan per Orang dalam Satu Tahun Nominal Amount of Compensation Paid per Person in One Year	Jumlah Karyawan Number of employees
14.177.500	1
16.598.885	1
20.338.560	1
31.600.859	1
50.972.173	1
66.347.010	1
95.394.288	1
219.664.548	1
304.501.017	1
417.357.042	1

Remunerasi Bersifat Variabel yang Ditangguhkan

Deferred Variable Remuneration

Remunerasi Bersifat Variabel Variable Remuneration	2021		2020	
	Tidak Ditangguhkan Not Deferred	Ditangguhkan Deferred	Tidak Ditangguhkan Not Deferred	Ditangguhkan Deferred
1. Tunai Cash	8.751	4.238	6.618	3.309
2. Saham/Instrumen yang berbasis saham yang diterbitkan Bank (lembar) Stock/stock-based instrument issued by the Bank (share)	0	0	0	0

Rincian Jumlah Remunerasi dalam Satu Tahun

Details of Total Remuneration In One Year

Remunerasi yang Bersifat Tetap Permanent Remuneration	
Gaji Pokok Base Salary	389.838.822.468
Tunjangan Hari Raya (THR) Lebaran Allowance	32.137.973.873
Tunjangan Akhir Tahun (TAT) Year-End Allowance	31.847.486.354

Tanggung Jawab Sosial Perusahaan

Corporate Social Responsibility

Sebagai Bank yang menjadikan nasabah sebagai fokus utamanya, Bank mengadopsi program Tanggung Jawab Sosial Perusahaan dengan konsep "triple bottom line" yang secara sistematis berfokus pada *People, Planet, dan Profit*.

Tanggung Jawab Sosial Perusahaan

Bank selalu berkomitmen untuk memberikan nilai tambah dan dampak yang positif, tidak hanya terhadap nasabah tetapi juga masyarakat di sekitarnya dalam menjalankan kegiatan sehari-hari. Hal ini sejalan dengan purpose Bank, yaitu "*Building a brighter future for all*".

Setiap organ Bank, baik seluruh karyawan maupun manajemen, bertanggung jawab menjalankan kegiatan bisnis dan organisasi sesuai dengan Kode Etik Bank, sekaligus memastikan kontribusi yang berkelanjutan kepada masyarakat sekitar. Dalam menjalankan program Tanggung Jawab Sosial Perusahaan (*Corporate Social Responsibility/CSR*), Bank menerapkan konsep *triple bottom line* yang terdiri dari *People, Planet, dan Profit*.

Sebagai bagian penting dari operasional Bank, CSR mencakup serangkaian kebijakan dan kegiatan yang sesuai dengan nilai-nilai sosial, etika, dan profesional. Program CSR Bank meliputi empat area, yaitu:

1. Tanggung jawab terhadap lingkungan.
2. Kesehatan, Keselamatan, dan Kesejahteraan (K3).
3. Pengembangan sosial dan masyarakat.
4. Tanggung jawab terhadap nasabah.

Bank menyadari pentingnya mencapai keseimbangan antara dampak sosial, ekonomi, dan lingkungan dari kegiatan Bank dalam melaksanakan program CSR serta memastikan pendekatan yang berkelanjutan. Dengan tercapainya keseimbangan yang tepat, Bank percaya dapat menggapai keberhasilan usaha diiringi dengan peningkatan kesejahteraan karyawan, nasabah, masyarakat sekitar, serta lingkungan.

As a customer-centric bank that puts its customers at the centre of everything it does, The Bank adopts a Corporate Social Responsibility program of "triple bottom line" that systematically focuses on People, Planet, and Profit.

Corporate Social Responsibility

The Bank is always committed to add value and create a positive impact on its customers as well as its surrounding communities in the day-to-day running of its operations. This is in line with the Bank's purpose to "Building a brighter future for all".

Every organ of the Bank, all of its staff and management have a shared responsibility in conducting its business and organisational activities according to the Bank's Code of Conduct, whilst ensuring an ongoing contribution to its surrounding communities. The Bank implements a triple bottom line concept of People, Planet, and Profit when it comes to its Corporate Social Responsibility programs.

As an integral part of the Bank's operations, CSR consists of a series of policies and activities that are fully compliant to social, ethical, and professional values. The Bank's CSR program is divided into four areas:

1. Responsibility to the environment.
2. Health, Safety, and Wellbeing (K3).
3. Social and community development.
4. Responsibility to the customers.

The Bank is aware that it must strike a balance between the social, economic and environmental impact of its activities when implementing its CSR program while at the same time ensuring a sustainable approach. By achieving this right balance, it is the belief of the Bank that fostering a successful franchise whilst improving the welfare of employees, customers, local communities, and the environment can be achieved.

Dasar Hukum Penerapan CSR

Berikut peraturan-peraturan yang menjadi landasan hukum penerapan CSR:

1. Undang-Undang Republik Indonesia Nomor 8 Tahun 1999 tentang Perlindungan Konsumen.
2. Undang-Undang Republik Indonesia Nomor 13 Tahun 2003 tentang Ketenagakerjaan.
3. Undang-Undang Republik Indonesia Nomor 40 Tahun 2007 tentang Perseroan Terbatas.
4. Peraturan Pemerintah Republik Indonesia Nomor 47 Tahun 2012 tentang Tanggung Jawab Sosial dan Lingkungan Perseroan Terbatas.
5. Peraturan Otoritas Jasa Keuangan No. 1/ POJK.07/2013 tentang Perlindungan Konsumen Sektor Jasa Keuangan.
6. Peraturan Otoritas Jasa Keuangan No.76/ POJK.07/2016 tentang Peningkatan Literasi dan Inklusi Keuangan di Sektor Jasa Keuangan bagi Konsumen dan/atau Masyarakat.

Struktur Pengelolaan, Kebijakan, dan Pelaksanaan

Program CSR Bank dikelola oleh unit komunitas dan CSR yang berada dalam naungan Divisi *Corporate Communication*, yang merupakan bagian dari Departemen *PD Office*.

Dalam rangka memastikan keakuratan dan keberlangsungan kegiatan CSR, pada tahun 2014 Bank menyusun pedoman pelaksanaan kegiatan yang tertuang dalam Kebijakan dan Prosedur CSR. Pedoman ini disusun sesuai dengan peraturan perundang-undangan yang berlaku.

Program CSR utama Bank berkaitan dengan pengembangan sosial dan kemasyarakatan dan terbagi menjadi dua inisiatif:

1. Program Literasi Edukasi Keuangan
2. Program Corporate Philanthropy

Legal Basis of CSR Implementation

The following regulations serve as legal basis in CSR implementation:

1. Legislation of the Republic of Indonesia Number 8 of 1999 on Consumer Protection.
2. Legislation of the Republic of Indonesia Number 13 of 2003 on Employment.
3. Legislation of the Republic of Indonesia Number 40 of 2007 on Limited Liability Company.
4. Government Regulation of the Republic of Indonesia Number 47 of 2012 on Social and Environmental Responsibility of Limited Liability Companies.
5. OJK Regulation No.1/POJK.07/2013 on Consumer Protection of the Financial Services Sector.
6. OJK Regulation No.76/POJK.07/2016 on the Improvement of Financial Literacy and Inclusion in the Financial Services Sector for Consumers and/or Society.

Management, Policy, and Implementation Structure

The Bank's CSR program is managed by the Community and CSR unit within the Division of Corporate Communications, which is part of the PD Office Department.

To ensure the accuracy and continuity of CSR activities, in 2014 the Bank established guidelines on the implementation of activities within the Bank's CSR policies and procedures. The drafting of these guidelines referred to the prevailing laws and regulations.

The Bank's main CSR program is in social and community development, and is divided into two initiatives:

1. Financial Education Literacy Program
2. Corporate Philanthropy Program

Di bawah naungan Departemen SDM, Bank juga menerapkan program yang berkaitan dengan Pelestarian Lingkungan, Kesehatan & Keselamatan Kerja, serta Tanggung Jawab terhadap Nasabah.

Tanggung Jawab terhadap Lingkungan

Bank menyadari bahwa kesejahteraan lingkungan berperan penting dalam kesejahteraan nasabah, masyarakat sekitar, dan berdampak pada keberlanjutan bisnis jangka panjang. Oleh karena itu, Bank senantiasa mendukung upaya perlindungan dan pelestarian lingkungan hidup melalui kebijakan, program, dan peraturan perusahaan. Hal ini diharapkan akan membantu meminimalkan dampak operasional terhadap lingkungan.

Bank menunjukkan komitmen terhadap lingkungan dengan mencantumkan kewajiban memiliki Analisis Mengenai Dampak Lingkungan (AMDAL) terkait pemberian kredit kepada usaha yang berisiko memiliki dampak lingkungan. Selain itu, Bank memiliki pengelolaan limbah yang baik, membatasi penggunaan kertas, dan memiliki kebijakan hemat energi baik di kantor cabang maupun kantor pusat.

Penjelasan lebih lanjut mengenai penerapan CSR dalam pelestarian lingkungan di seluruh kegiatan operasional Bank terdapat dalam Laporan Keberlanjutan yang menyertai Laporan Tahunan ini.

Mekanisme Pengaduan Masalah Lingkungan

Bank mendorong seluruh karyawan untuk peduli terhadap lingkungan. Prinsip ini didukung dengan sikap terbuka terhadap pengaduan mengenai masalah lingkungan. Bank sangat mementingkan keterlibatan karyawan agar mereka turut memiliki kepedulian dan tanggung jawab terhadap lingkungan hidup.

Kesehatan, Keselamatan, dan Kesejahteraan

Bank senantiasa memprioritaskan kesehatan dan keselamatan karyawan dengan berpegang teguh pada komitmen untuk memberikan perlindungan kesehatan dan keselamatan kerja sesuai dengan praktik terbaik dan peraturan yang berlaku. Oleh karena itu, Bank memiliki

Under the Human Resources department, the Bank also implements programs related to Environmental Preservation, Occupational Health & Safety, as well as Customer Responsibility.

Responsibility to the Environment

The Bank understands that environmental wellbeing plays a crucial part in the overall wellbeing of its customers, surrounding communities, and has an impact in its long-term business sustainability. Therefore, the Bank has always supported the protection and preservation of the environment through its policies, programs, and regulations. The Bank hopes that these efforts will help minimise the impact that its operations may cause to the environment.

The Bank's commitment to the environment includes having a requirement of Environmental Impact Analysis (EIA) when extending credit to businesses that may have an adverse environmental impact. Furthermore, the Bank has proper waste management, limits the use of paper, and has energy-saving policies in its branches and head office.

For further details on the implementation of CSR in environmental preservation all across the Bank's operational activities, please see the Sustainability Report that accompanies this Annual Report.

Complaint Mechanism on Environmental Issues

The Bank encourages all its employees to care for the environment. This principle is backed by openly welcoming complaints on environmental issues. The Bank places great importance on its employees to be involved, so they care and are concerned for the environment.

Health, Safety and Wellbeing

The Bank has always prioritised its employees health and safety above all by holding fast to its commitment to provide health protection and occupational safety according to the best practices and prevailing regulations. The Bank therefore has a Health, Safety

kebijakan Kesehatan, Keselamatan & Kesejahteraan (K3), yang selengkapnya dapat dilihat pada Bab Analisis & Pembahasan Manajemen Laporan Tahunan di halaman 90-92 dan sub bab Aspek Ketenagakerjaan dalam Laporan Keberlanjutan Bank 2021 yang menyertai Laporan Tahunan ini di halaman 285-291.

Pengembangan Sosial dan Masyarakat

Sebagai bentuk tanggung jawab untuk meningkatkan pengetahuan, keterampilan, dan pemahaman masyarakat terkait lembaga keuangan, serta produk dan jasanya, Bank berkomitmen penuh dalam menjalankan berbagai kegiatan edukasi, baik untuk nasabah maupun masyarakat umum yang bertujuan untuk memberikan dampak positif bagi masyarakat, serta membantu mengelola keuangan pribadi maupun bisnis mereka dalam rangka meningkatkan kesejahteraan finansial. Penjelasan mengenai program Pengembangan Sosial dan Masyarakat bank selengkapnya disajikan pada Laporan Keberlanjutan yang menyertai Laporan Tahunan ini.

Tanggung Jawab terhadap Nasabah

Fokus utama Bank adalah kepentingan dan kepuasan nasabah. Oleh karena itu, Bank selalu berkomitmen untuk menjadi "*Customer Centric Organisation*" yang memberikan pengalaman perbankan yang mudah bagi nasabah, baik di kantor cabang, *Contact Centre*, maupun kanal digital lainnya. Penjelasan mengenai Tanggung Jawab Bank terhadap Nasabah selengkapnya disajikan pada bab Analisis dan Pembahasan Manajemen Laporan Tahunan di halaman 92-96 dan sub bab Tanggung Jawab Pengembangan Produk/Jasa Berkelanjutan dalam Laporan Keberlanjutan Bank 2021 yang menyertai Laporan Tahunan ini di halaman 294-296.

& Wellbeing (K3) policy in place. More details on the Bank's Health, Safety & Wellbeing can be found in the Management Discussion & Analysis Chapter of this Annual Report on page 90-92 and Manpower Aspect sub chapter of the Bank's 2021 Sustainability Report that accompanies this Annual Report on pages 285-291.

Social and Community Development

As part of the Bank's responsibility in improving knowledge, skills, and understanding of the community in regards to a financial institution as well as its products and services, the Bank is fully committed in providing educational activities, both for its customers as well as the public with the sole purpose to provide a positive impact on the community, and help them manage their finances, both personal and business, in order to improve financial wellbeing. More details on the bank's Social and Community Development programme can be found in the Sustainability Report that accompanies this Annual Report.

Customer Responsibility

The Bank sees the interest and satisfaction of its customers as its main focus. Therefore, it has been committed from the start to be a "Customer-Centric Organisation" that provides easy banking experience for customers, whether in the branch offices, Contact Centre, as well as through its digital channels. More details on the Bank's Customer Responsibility can be found in the Management Discussion and Analysis chapter of this Annual Report on page 92-96 and Responsibility for Product Development/Sustainable Service sub chapter of the Bank's 2021 Sustainability Report that accompanies this Annual Report on pages 294-296.