

AFFILIATED TRANSACTIONS AND CONFLICT OF INTEREST TRANSACTIONS

Policy of Affiliated Transactions and Conflict of Interests

BCA already has a policy in place regarding affiliated transactions and transactions containing conflicts of interest, as stipulated in the Directors' Decree No. 214/SK/DIR/2019 dated December 27, 2019 concerning Affiliated Transactions and Transactions Containing Conflicts of Interest and the Circular Letter No. 319/SE/POL/2019 dated December 27, 2019 concerning Instructions for Implementation of Affiliated Transactions and Transactions Containing Conflicts of Interest. The main points of the Affiliate Transaction and Conflict of Interest Policy can be found in the GCG Policy section of the BCA website (<https://www.bca.co.id/en/tentang-bca/tata-kelola/acgs/kebijakan-gcg>).

In light of the publication of OJK Regulation No. 42/POJK.04/2020 dated July 2, 2020 concerning Affiliated Transactions and Transactions with Conflicts of Interest, BCA always ensures that internal policies are in compliance with recent regulatory developments. In accordance with OJK Regulation No. 42/POJK.04/2020 concerning Affiliated Transactions and Transactions with Conflicts of Interest, BCA conducts periodic outreach to its subsidiaries, branch offices, related work units at regional offices, and head office regarding affiliated transactions.

BCA Affiliated Parties

BCA affiliated parties are as follows:

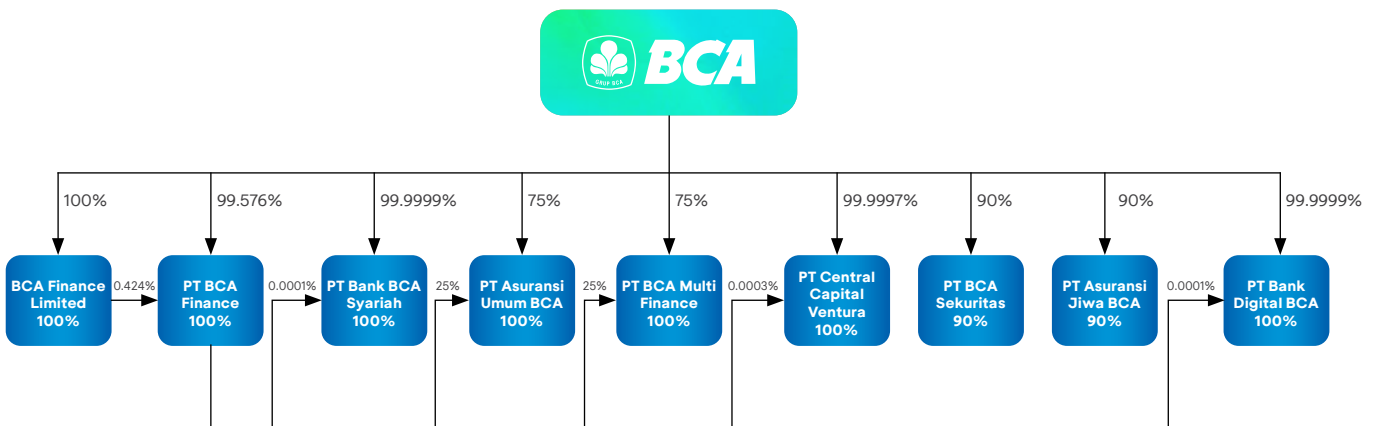
- Employees, Directors, and Commissioners of BCA.
- BCA's major shareholders, namely individuals or corporations that directly or indirectly own at least 20% (twenty percent) voting rights of all shares with voting rights issued by BCA, or an amount less than that determined by OJK.
- Controlled Company of BCA, either directly or indirectly
- Companies that have one or more Directors or Commissioners holding/concurrent positions as Directors or Commissioners of BCA.
- Companies controlled by BCA Major Shareholders.
- Someone who has a family relationship by marriage or descent to the second degree, both horizontally and vertically, with members of the Board of Directors of BCA, members of the Board of Commissioners of BCA, and/or Main Shareholders of BCA.

BCA Controlled Companies (Subsidiaries)

BCA has 9(nine) Subsidiaries that are not Public Companies, and their financial statements are consolidated with BCA. BCA Subsidiaries are as follows:

1. PT Bank Digital BCA
2. PT Bank BCA Syariah
3. PT BCA Finance
4. PT BCA Multi Finance
5. BCA Finance Limited
6. PT BCA General Insurance
7. PT Asuransi Jiwa BCA
8. PT BCA Securities
9. PT Central Capital Ventura

As of December 31, 2022, BCA Share Ownership Structure in 9 (nine) Subsidiaries is described as follows:



1. Affiliated Transaction

Disclosure of Affiliated Transactions in the 2022 Annual Report

Disclosure of BCA's Affiliate Transaction Report in the 2022 Annual Report also with reference to the provisions of Article 22 of OJK Regulation Regulation No. 42/POJK/04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions ("OJK Regulation No. 42 of 2020"), namely in the case of Affiliated Transactions and/or Conflict of Interest Transactions carried out by a Controlled Company that is not a Public Company and its financial statements are consolidated with a Public Company, the Public Company must carry out the procedures as regulated in OJK Regulation No. 42 year 2020. In this sub-chapter, A Controlled Company defined as BCA's Subsidiaries as elaborated on page 101 of this Annual Report, in which the term Subsidiary is defined, among others, in OJK Regulation No. 18/POJK.03/2014 concerning Implementation of Integrated Governance for Financial Conglomerate and OJK Regulation No. 17/POJK.03/2014 concerning Implementation of Integrated Risk Management for Financial Conglomerates.

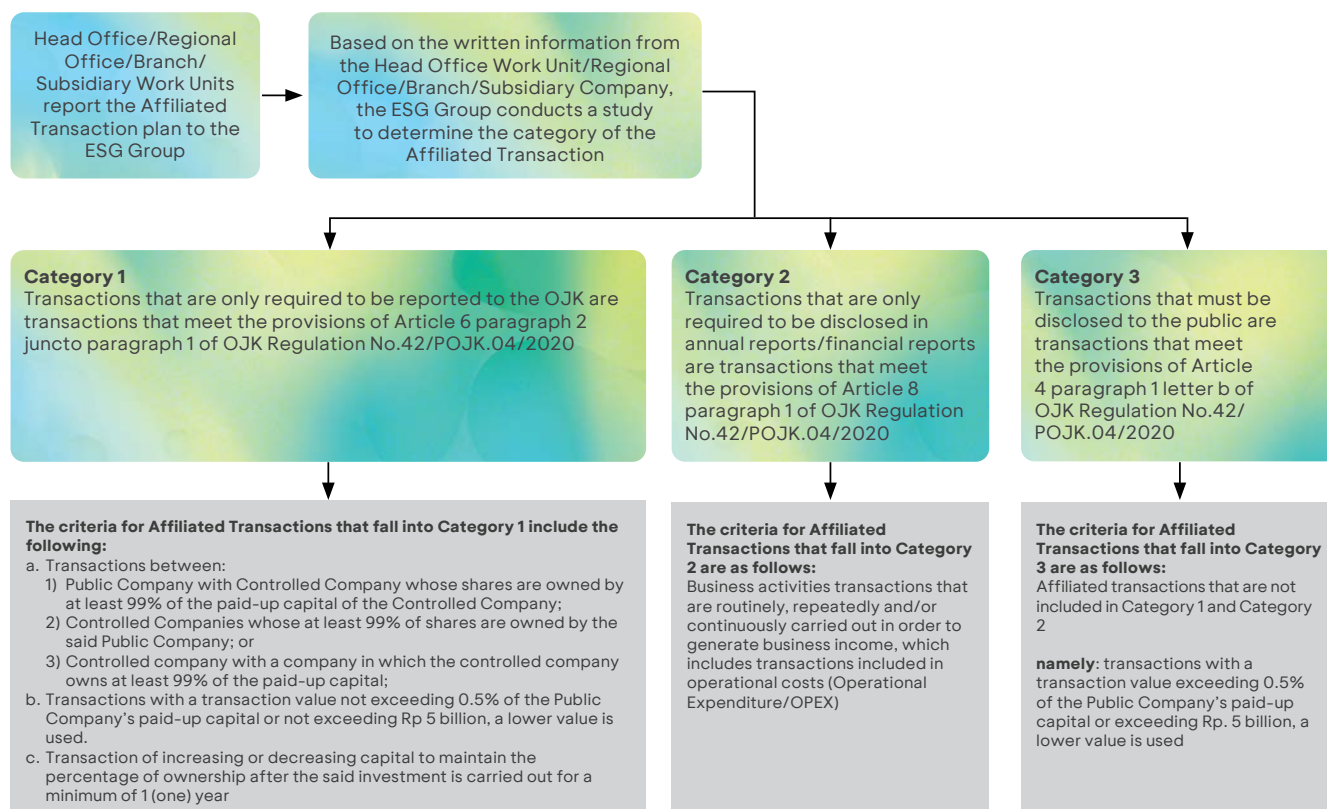
Affiliated Transactions that are disclosed in the 2022 Annual Report are as follows:

- Transactions between BCA and BCA Subsidiaries
- Transactions between BCA and BCA's Affiliated Parties
- Transactions between BCA Subsidiaries
- Transactions between BCA Subsidiaries and BCA's Affiliated Parties

Mechanism of Review and Approval of Affiliated and Conflicts of Interest Transactions

Each work unit that conducts transactions with affiliated parties must give written notice to the Environment Sustainability Governance Group (ESG Group) along with the necessary data. The ESG Group works in concert with the pertinent work units to conduct an analysis and determine the subsequent steps that must be taken in connection with the proposed transaction in accordance with the applicable provisions. In ensuring transactions are carried out in the best interests of the company and to prevent potential conflicts of interest that may occur and harm BCA. In accordance with its duties and responsibilities, the Audit Committee will review and advise the Board of Commissioners on potential conflicts of interest that may occur at BCA.

Affiliated Transaction and Conflict of Interest Flow Mechanism in BCA





A. Realization of Affiliated Transactions carried out by BCA in 2022

A.1. Category 1 (Affiliated Transactions that only require to be reported to OJK)

Throughout 2022, there were 17 (seventeen) affiliated transactions with a total value of Rp158,437,170,485.00 which were included in Category 1, as follows:

No.	Date	Type of Transaction	Affiliated Party	Value of Transaction	Nature of Relationship
1	January 11, 2022	Room Rental (15 National Locations)	PT BCA Finance	Rp51,124,289,542.00	
2	January 26, 2022	Room Rental (58 National Locations)	PT Bank BCA Syariah	Rp5,151,719,341.00	Transactions between BCA and BCA Subsidiaries
3	February 4, 2022	Room Rental BCA Wolter Monginsidi	PT Central Capital Ventura	Rp1,115,400,000.00	
4	February 10, 2022	Sale and Purchase of Software for Dynamic LC Convergent OCR Development and Its Implementation	PT Kecerdasan Buatan Indonesia	Rp863,000,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
5	March 14, 2022	Sale and Purchase of foreclosed collateral Plaza Mutiara 17 th Floor	PT Bank Digital BCA	Rp16,500,000,000.00	Transactions between BCA and BCA Subsidiaries
6	March 25, 2022	Sale and Purchase of KCU Banda Aceh Goods	PT Bank BCA Syariah	Rp206,455,000.00	
7	March 31, 2022	Provision of Regulatory Technology Application Development Services	PT Prosa Solusi Cerdas	Rp1,100,000,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
8	April 20, 2022	Development of the J-Valas Module Settlement Application	PT Darta Media Indonesia	Rp1,154,400,000.00	
9	April 26, 2022	Room Rental	PT Asuransi Jiwa BCA	Rp980,409,276.00	
10	April 27, 2022	Sale of Abandoned Property	PT BCA Multi Finance	Rp8,760,000,000.00	Transactions between BCA and BCA Subsidiaries
11	Juli 12, 2022	Provision of Use of Cash Management Applications Services	PT Bank BCA Syariah	Rp18,041,416.00	
12	October 3, 2022	Provision of Security Infrastructure Services	PT Bank BCA Syariah	Rp815,850,000.00	
13	October 7, 2022	Procurement of Jabra PanaCast 50	PT Global Digital Niaga Tbk	Rp71,285,310.00	Transactions between BCA and companies controlled by BCA's main shareholders
14	October 24, 2022	Purchase of 34 Unit of Notebook	PT Global Digital Niaga Tbk	Rp947,349,480.00	
15	December 5, 2022	BCA's Further Capital Investment in PT Asuransi Jiwa BCA	PT Asuransi Jiwa BCA	Rp67,500,000,000.00	Transactions between BCA and BCA Subsidiaries
16	December 22, 2022	Rental of KCP Renon Building Room	PT BCA Multi Finance	Rp110,769,120.00	Transactions between BCA and BCA Subsidiaries
17	December 23, 2022	Rental of KCP Resinda Mall	PT Bukit Muria Jaya Estate	Rp 2,018,202,000.00	Transactions between BCA and companies controlled by BCA's main shareholders

A.2. Category 2 (Affiliated Transactions that only require to be disclosed in Annual Report/Financial Statement)

- Throughout 2022, there were 28 Affiliated Transactions which are relatively large (above Rp 1 billion), as follows

No.	Type of Transaction	Affiliated Party	Value of Transaction	Nature of Relationship
1	Management & Office Facility Support dated January 17, 2022	PT Sentral Layanan Prima	Rp1,293,655,879.00	Transactions between BCA and companies controlled by BCA Pension Funds
2	Subscribed Link IXP and IIX dated January 26, 2022	PT Angkasa Komunikasi Global Utama	Rp1,116,475,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
3	Other Service Work dated February 10, 2022	PT Dana Purna Investama	Rp4,550,856,601.00	Transactions between BCA and companies controlled by BCA Pension Funds
4	Internet Subscription Service Provision Agreement dated February 21, 2022	PT Angkasa Komunikasi Global Utama	Rp1,198,800,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
5	Cooperation Agreement for the Provision of BCA ATM Machine Management Services dated March 1, 2022	PT Abacus Cash Solution	Rp123,263,622,761.12	Transactions between BCA and companies controlled by BCA Pension Funds
6	Provision of BCA ATM Machine Management Services dated March 1, 2022	PT Abacus Dana Pensiuntama	Rp37,048,790,835.92	
7	Information Technology Development dated March 10, 2022	PT Akar Inti Teknologi	Rp13,973,879,713.00	Transactions between BCA and companies controlled by BCA's main shareholders
8	Security Key Development Renewal Using Unbound dated March 30, 2022	PT Akar Inti Teknologi	Rp46,420,000,000.00	
9	Oris Management dated March 30, 2022	PT Danamas Insan Kreasi Andalan	Rp3,251,340,480.00	Transactions between BCA and companies controlled by BCA Pension Funds
10	Base24 Support System dated May 24, 2022	PT Akar Inti Solusi	Rp7,595,730,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
11	Outsourcing Services dated June 13, 2022	PT Dana Purna Investama	Rp1,981,799,817.00	Transactions between BCA and companies controlled by BCA Pension Funds
12	Outsourcing Services dated June 17, 2022	PT Dana Purna Investama	Rp1,424,564,979.00	
13	Lease Agreement for Bird Beak Outdoor Area BCA Tower dated June 27, 2022	PT Grand Indonesia	Rp1,053,445,500.00	Transactions between BCA and companies controlled by BCA's main shareholders
14	Foreclosed collateral sales dated July 13, 2022	PT Dana Purna Investama	Rp3,330,000,000.00	Transactions between BCA and companies controlled by BCA Pension Funds
15	MF Data Protection Modernization dated July 20, 2022	PT Akar Inti Solusi	Rp1,665,000,000.00	
16	Wealth Management Summit 6-9 September 2022 dated August 20, 2022	Hotel Indonesia Kempinski	Rp1,694,000,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
17	Promotion Expenses Outside Mass Media dated August 10, 2022	PT Grand Indonesia	Rp2,814,247,000.00	
18	Upgrade Subscription Indosat Internet Link INP and INIX MBCA and WSA 2 dated September 20, 2022	PT Angkasa Komunikasi Global Utama	Rp4,534,905,000.00	



No.	Type of Transaction	Affiliated Party	Value of Transaction	Nature of Relationship
19	Event Organizer Services dated September 21, 2022	PT Darta Media Indonesia	Rp5,598,760,426.00	
20	Upgrade Subscription Indosat Internet Link INP and INIX MBCA and WSA 2 dated October 3, 2022	PT Angkasa Komunikasi Global Utama	Rp1,073,277,500.00	Transactions between BCA and companies controlled by BCA's main shareholders
21	Procurement of Amazon Web Services dated October 19, 2022	PT Darta Media Indonesia	Rp1,229,683,594.00	
22	Software Development for Digital Solutions dated October 24, 2022	PT Darta Media Indonesia	Rp8,500,000,000.00	
23	Promotion Outside Mass Media dated October 24, 2022	PT Global Digital Niaga Tbk	Rp2,077,938,803.00	
24	LED- National & WPI Branches dated November 8, 2022	PT Abacus Teknika Solusindo	Rp2,430,461,439.00	Transactions between BCA and companies controlled by BCA Pension Funds
25	Official Training Trip dated November 8, 2022	PT Grand Indonesia	Rp2,357,867,750.00	
26	Link NAP Info Subscription Extension for Open IXP and IIX dated December 7, 2022	PT Angkasa Komunikasi Global Utama	Rp1,598,400,000.00	Transactions between BCA and companies controlled by BCA's main shareholders
27	Voice Biometric License Extension dated December 8, 2022	PT Prosa Solusi Cerdas	Rp1,609,500,000.00	
28	Sponsor Image BCA BCA Image Sponsor dated 09 December 2022	PT Darta Media Indonesia	Rp2,575,000,000.00	

- In addition to the 28 Affiliated Transactions above, there are Affiliated Transactions in the form of loans, overdrafts, placements and/or deposits with position values as of December 31, 2022, namely as follows:

No.	Type of Transaction	Affiliated Party	Value of Transaction	Nature of Relationship
1.	Loan granted	PT Bank Digital BCA	Rp14,989,646.00	Transactions between BCA and BCA Subsidiaries
		PT BCA Multi Finance	Rp144,479,012,595.00	
2.	Loan received	-	-	
3.	Overdraft granted	PT BCA Finance	Rp35,517,000,000.00	
4.	Overdraft received	-	-	
5.	Placement of funds (in the form of current account, deposits, and equivalent)	BCA Finance Limited	HKD 784,000.00	
		PT Bank BCA Syariah	Rp100,920,882.00	

No.	Type of Transaction	Affiliated Party	Value of Transaction	Nature of Relationship
6.	Deposits of funds (in the form of current account, deposits, and equivalent)	PT BCA Sekuritas	Rp8,757,413,649.00	Transactions between BCA and BCA Subsidiaries
		PT Bank Digital BCA	Rp58,545,331,176.00	
		PT BCA Finance	Rp13,734,981.00	
		PT Central Capital Ventura	Rp742,837,171.00	
		BCA Finance Limited	HKD16,564,000.00	
		PT Asuransi Umum BCA	Rp40,713,054,439.00	
		PT Bank BCA Syariah	Rp14,304,902,683.00	
		PT BCA Multi Finance	Rp7,378,657,634.00	
		PT Asuransi Jiwa BCA	Rp3,383,029,500.00	

- There were 285 other transactions with a total value of Rp23,960,518,611.00 which are not disclosed in details in this Annual Report given that the value of each transaction is relatively small (immaterial).

A.3. Category 3 (Affiliated Transactions that require to conduct information disclosure to the public)

Throughout 2022, there were no Affiliated Transactions that require to conduct information disclosure to the public.

B. Realization of Affiliated Transactions carried out by BCA's Subsidiaries in 2022

B.1. Category 1 (Affiliated Transactions that only require to be reported to OJK)

Throughout 2022, there was no Affiliated Transaction which is included in Category 1.

B.2. Category 2 (Affiliated Transactions that only require to be disclosed in Annual Report/Financial Statement)

- In 2022, there are 3 affiliated transactions carried out by BCA's subsidiaries with the value of more than Rp1 billion, are as follows:

No.	Type of Transaction	Affiliated Party	Value of Transaction	Nature of Relationship
1	Outsourcing Work Agreement between PT Bank Digital BCA and PT Dana Purna Investama dated February 16, 2022	PT Bank Digital BCA with PT Dana Purna Investama	Rp1,060,993,315.00	Transactions between BCA Subsidiaries and companies controlled by BCA Pension Funds
2	Cooperation Agreement for Alto Switch and Card Management Services between PT Alto Network and PT Bank Digital BCA dated May 24, 2022	PT Bank Digital BCA with PT Alto Network	Rp29,900,386,859.00	Transactions between BCA Subsidiaries and companies controlled by BCA's main shareholders
3	Fraud Detection System (FDS) Service Cooperation Agreement between PT Alto Network and PT Bank Digital BCA dated July 25, 2022	PT Bank Digital BCA with PT Alto Network	Rp2,416,569,900.00	



- In addition to the 3 Affiliated Transactions above, there are Affiliated Transactions in the form of loans, overdrafts, placements and/or deposits with position values as of December 31, 2022, namely as follows:

No.	Type of Transaction	Transaction Party	Value of Transaction	Nature of Relationship
1.	Loan Granting/ Receiving Transactions	PT Bank Digital BCA with PT BCA Finance	Rp200,000,000,000.00	Transactions among BCA Subsidiaries
		PT BCA Sekuritas with PT BCA Finance	Rp212,228,234.00	
2.	Overdraft Granting/Receiving Transactions	-	-	
3.	Placement/saving of funds (in the form of current account, deposits and equivalent	PT Central Capital Ventura with PT Bank BCA Syariah	Rp9,701,869,944.00	
		PT BCA Sekuritas with PT Bank BCA Syariah	Rp25,175,269,110.00	
		PT Asuransi Jiwa BCA with PT Bank BCA Syariah	Rp108,019,078,621.00	
		PT Asuransi Umum BCA with PT Bank BCA Syariah	Rp72,500,000,000.00	
		PT BCA Finance with PT Bank BCA Syariah	Rp2,468,077.10	

- There were 164 other transactions with a total value of Rp12,612,525,025.98 which are not disclosed in details in this Annual Report given that the value of each transaction is relatively small (immaterial).

B.3. Category 3 (Affiliated Transactions that require to conduct information disclosure to the public)

Throughout 2022, there were no Affiliated Transactions that require to conduct information disclosure to the public.

Transaction Fairness

The principles considered when conducting transactions with affiliated parties are as follows:

- Pay attention to the principles of Good Corporate Governance, namely transparency, accountability, responsibility, independence, and fairness.
- Ensure the transaction's feasibility, fair value, and terms (arm's length transaction).

Affiliated transactions conducted by BCA and BCA's Subsidiaries in 2022 are fair and at arm's length transactions.

Compliance of Affiliated Transactions with Applicable Procedures

Transactions are carried out with affiliated parties with the primary goal of providing the best possible benefits to BCA. In practice, all affiliated transactions that occur in 2022 have gone through procedures in accordance with BCA's policies on affiliated transactions.

2. Conflict of Interest Transactions

Policy on Conflicts of Interest

In accordance with BCA's code of ethics, the decision-making process is not influenced by other parties or any conflict of interest. Decision-making outcomes and existing conflicts of interest must be recorded and documented as evidence.

BCA's Policy on Conflicts of Interest are stated in Directors' Decree No. 219/SK/DIR/2003 dated November 10, 2003 concerning Conflicts of Interest Provision, which regulates that all levels of BCA must be aware of and avoid activities that may arise or cause conflicts of interest. BCA requires all employees in echelon 5 and above to digitally sign an Annual Disclosure form in order to manage potential conflicts of interest (as disclosed in the Internalization section of the Introduction to Governance chapter of this Annual Report).

In relation to Integrated Governance, the Board of Directors of BCA also ensures that the implementation of intra-group transaction risk management within the Financial Conglomeration is free from conflicts of interest among individual Financial Services Institutions.

Conflict of Interest Policy for the Board of Commissioners and the Board of Directors

Provisions related to conflicts of interest for the Board of Commissioners and the Board of Directors are regulated in the Corporate Governance Guidelines, among others, governing the following matters:

- Members of the Board of Commissioners and/or members of the Board of Directors who have a conflict of interest are prohibited from making decisions, and/or actions, and/or being involved in the process of carrying out transactions that may harm BCA or reduce BCA's profit and must disclose the condition of the conflict of interest referred in each decision.

- Members of the Board of Directors are not authorized to represent BCA in matters or transactions in which the member has a conflict of interest with BCA.

Compliance of Transactions Containing Conflicts of Interest with Applicable Policies

Throughout 2022, members of the Board of Commissioners and members of the Board of Directors of BCA have managed the potential for conflicts of interest as stipulated in the applicable provisions, including that if members of the Board of Commissioners or members of the Board of Directors have a conflict of interest, the members of the Board of Commissioners or members of the Board of Directors who have such conflict of interest do not participate in the decision making.

Independent Parties in Affiliated Transactions and Conflicts of Interest

In accordance with applicable regulations and as stipulated in BCA's internal policies, if there are transactions with affiliated parties that require to conduct information disclosure to the public and to be reported to OJK, BCA will appoint an independent appraiser to evaluate the fairness of the transaction value.

In the event that there is a transaction conducted by BCA with a third party that contains differences between the economic interests of BCA and the economic interests of members of the Board of Directors, members of the Board of Commissioners, major shareholders, or controllers that may be detrimental to BCA, BCA is required to use an independent appraiser to determine the fair value of the object of the transaction and /or the fairness of the transaction and obtain prior approval from BCA's Independent Shareholders through an Independent GMS.