

**ANNUAL REPORT OF
THE INTEGRATE GOVERNANCE IMPLEMENTATION
PT BANK CENTRAL ASIA Tbk**



FINANCIAL YEAR 2024

ANNUAL REPORT OF INTEGRATED GOVERNANCE IMPLEMENTATION OF THE FINANCIAL CONGLOMERATE PT BANK CENTRAL ASIA Tbk YEAR 2024

Annual Report of The Integrated Governance Implementation of The Financial Conglomerate PT Bank Central Asia Tbk (“**BCA**”) year 2024 was prepared in accordance with:

1. Financial Services Authority Regulation Number 18/POJK.03/2014 dated 18 November 2014 regarding Implementation of Integrated Governance for Financial Conglomerates;
2. Financial Services Authority Regulation No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks, and as revoked by Financial Services Authority Regulation No. 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks (herinafter referred as "**Financial Services Authority Regulation concerning the Implementation of Governance for Commercial Banks**");
3. Financial Services Authority Circular Letter Number 15/SEOJK.03/2015 dated 25 May 2015 on Implementation of Integrated Governance for Financial Conglomerates; and
4. Financial Services Authority Circular Letter Number 13/SEOJK.03/2017 dated 1 March 2017 on Implementation of Governance for Commercial Banks.

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I. SELF ASSESSMENT REPORT ON THE INTEGRATED GOVERNANCE IMPLEMENTATION FOR FINANCIAL YEAR 2024

According to the provisions in Financial Services Authority No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates Articles 44 and 45 in Chapter VIII concerning Reporting and Financial Services Authority Circular Letter No. 15/SEOJK.03/2015 concerning the Implementation of Integrated Governance for Financial Conglomerates, BCA as the Main Entity is required to prepare and submit regular integrated governance implementation assessment reports to the Financial Services Authority.

Integrated Governance implementation is assessed every semester (twice a year). BCA, as the Main Entity, carried out an integrated governance implementation self-assessment for Semester I and Semester II in 2024. The assessment covers 3 (three) aspects of Integrated Governance, namely Integrated Governance Structure, Process, and Results.

The Integrated Governance implementation assessment includes at least 7 (seven) factors, namely:

1. Implementation of duties and responsibilities of the Main Entity Board of Directors;
2. Implementation of duties and responsibilities of the Main Entity Board of Commissioners;
3. Duties and responsibilities of the Integrated Governance Committee;
4. Duties and responsibilities of the Integrated Compliance Work Unit;
5. Duties and responsibilities of the Integrated Internal Audit Work Unit;
6. Implementation of Integrated Risk Management;
7. Preparation and implementation of Integrated Governance Guidelines.

Main Entity : PT Bank Central Asia Tbk
Position of Report: December 31, 2024

The Result of Self-Assessment of the Implementation of Integrated Corporate Governance for Semester I and Semester II Year 2024

	Ranking	Ranking Definition
Semester I	1	The Financial Conglomerate has implemented Integrated Governance that is generally very good . This is reflected in the adequate fulfillment of the implementation of Integrated Governance principles. In the event of flaws in the implementation of Integrated Governance are discovered, they are not significant in general and can be immediately corrected by the Main Entity and/or FSI.
Semester II	1	The Financial Conglomerate has implemented Integrated Governance that is generally very good . This is reflected in the adequate fulfillment of the implementation of Integrated Governance principles. In the event of flaws in the implementation of Integrated Governance are discovered, they are not significant in general and can be immediately corrected by the Main Entity and/or FSI.

Analysis:

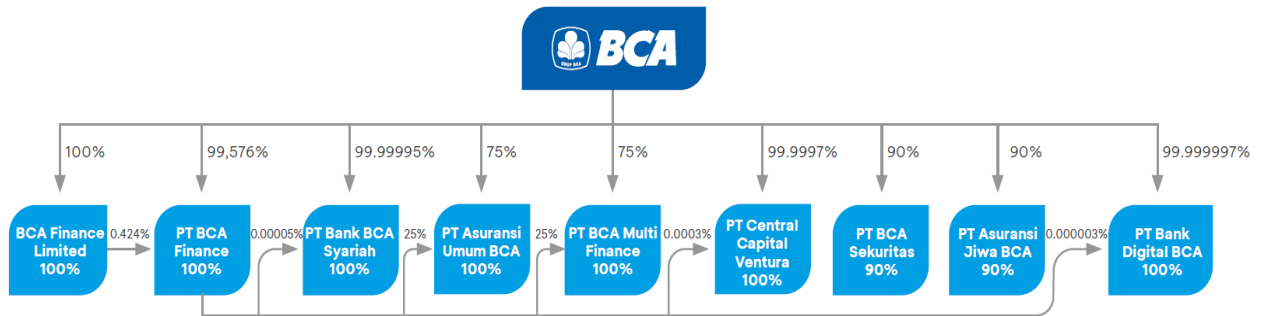
Based on the self assessment analysis to the Integrated Governance structure, Integrated Governance process, and Integrated Governance result on each assessment factor for Integrated Governance implementation, can be concluded as follows:

1. Integrated Governance Structure based on the assessment result is complete.
2. Integrated Governance Process based on the assessment result is very effective while it is supported by a complete structure.
3. Integrated Governance Result based on the assessment result is highly qualified, which generated from the aspect of Integrated Governance process which is very effective and supported by a complete structure.

II. BCA FINANCIAL CONGLOMERATE STRUCTURE AS OF 31 DECEMBER 2024

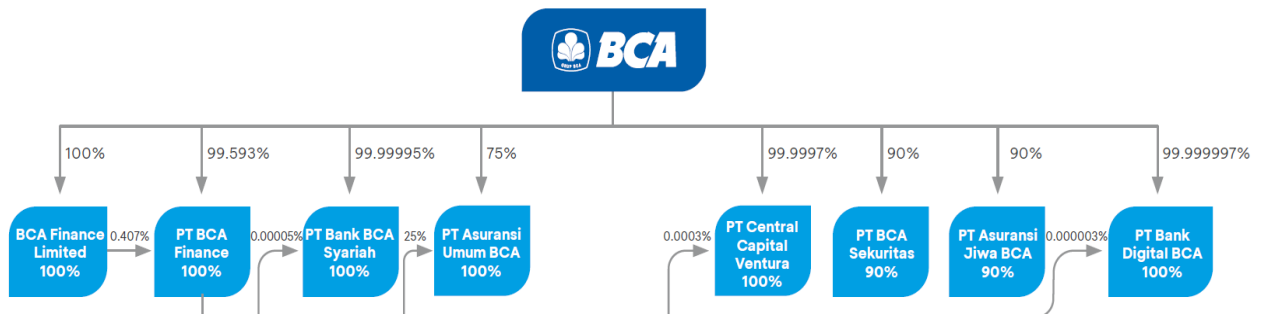
BCA Financial Conglomerate Structure as of January 1 – August 31, 2024

The structure of the BCA's Financial Conglomerate as of January 1 – December 31, 2024 is as follows:



BCA Financial Conglomerate Structure as of September 1, 2024 - December 31, 2024

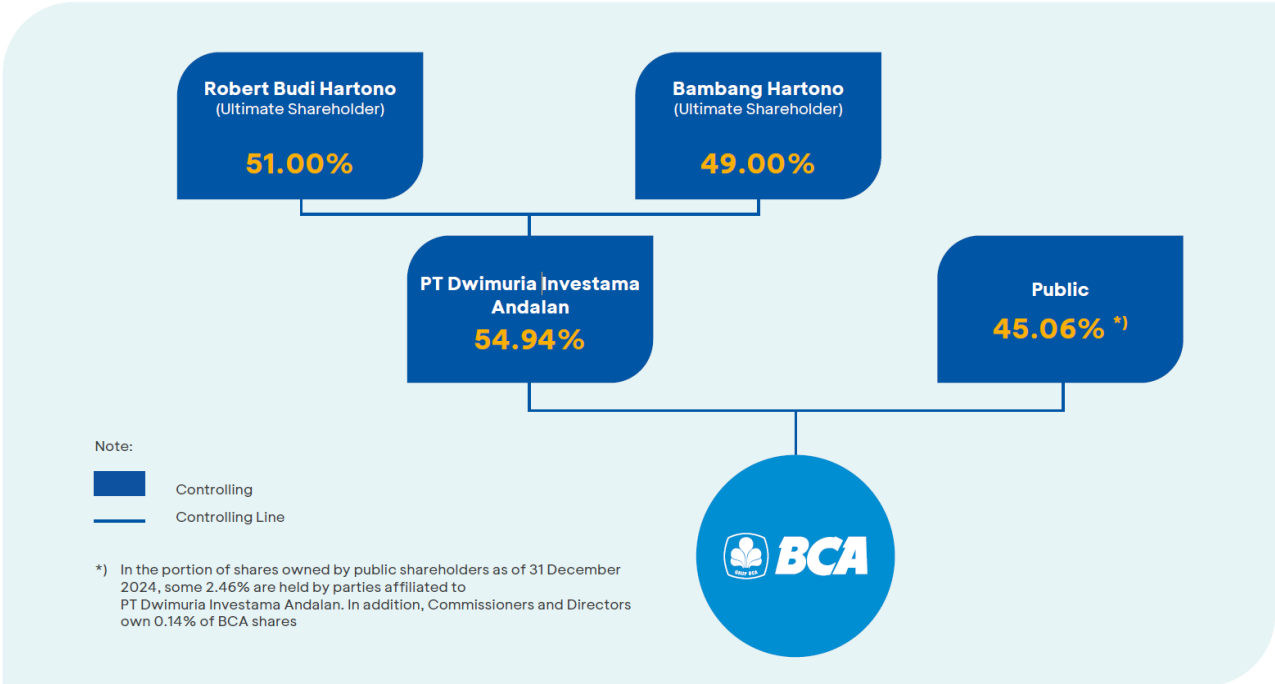
As of September 1, 2024, in connection with the merger of PT BCA Multi Finance into PT BCA Finance, the share ownership structure in the BCA Financial Conglomerate is as follows:



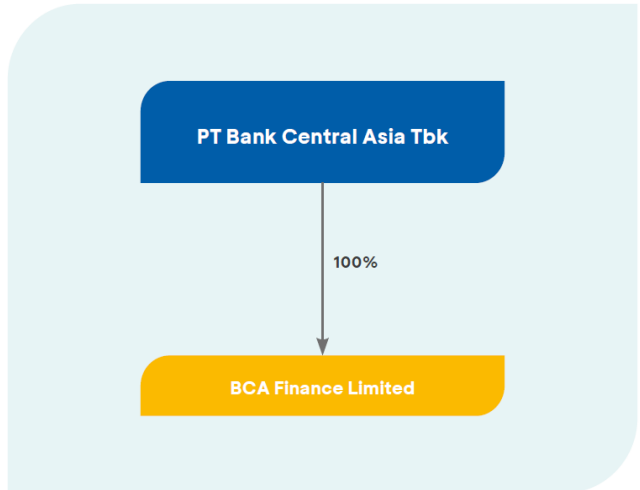
III. SHARE OWNERSHIP STRUCTURE IN FINANCIAL CONGLOMERATE WHICH DESCRIBES THE PARTIES WHO ARE SHAREHOLDERS OF FINANCIAL SERVICES INSTITUTIONS (SUBSIDIARIES) IN THE FINANCIAL CONGLOMERATE UP TO THE ULTIMATE CONTROLLING SHAREHOLDERS

As of December 31, 2024, the share ownership structure in BCA's Financial Conglomerate is as follows:

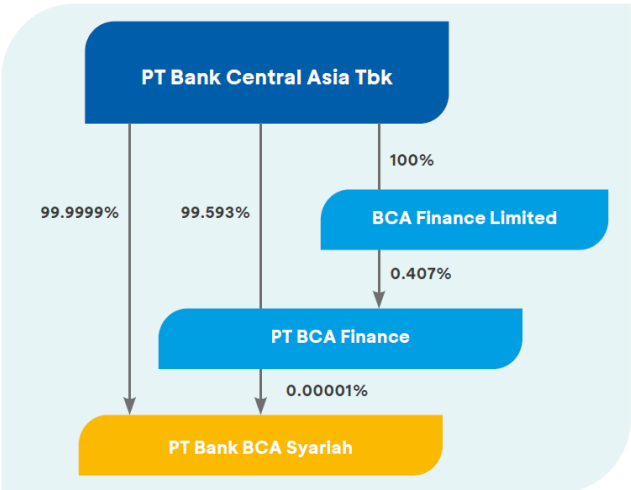
- Share Ownership Structure of PT BANK CENTRAL ASIA TBK as of 31 December 2024



- **SHARE OWNERSHIP STRUCTURE OF BCA FINANCE LIMITED AS OF DECEMBER 31, 2024**

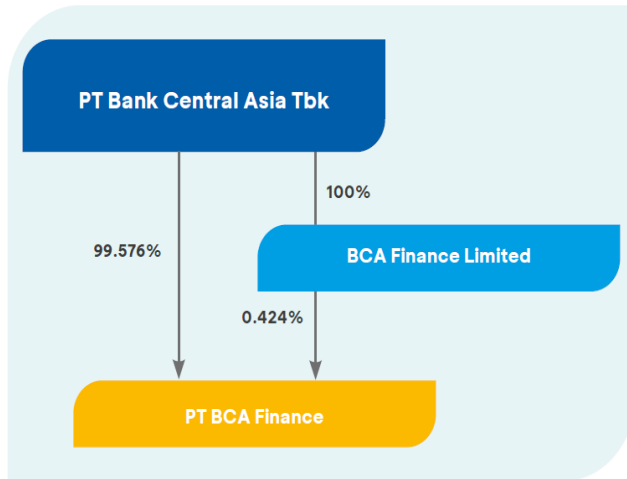


- **SHARE OWNERSHIP STRUCTURE OF PT BANK BCA SYARIAH AS OF DECEMBER 31, 2024**

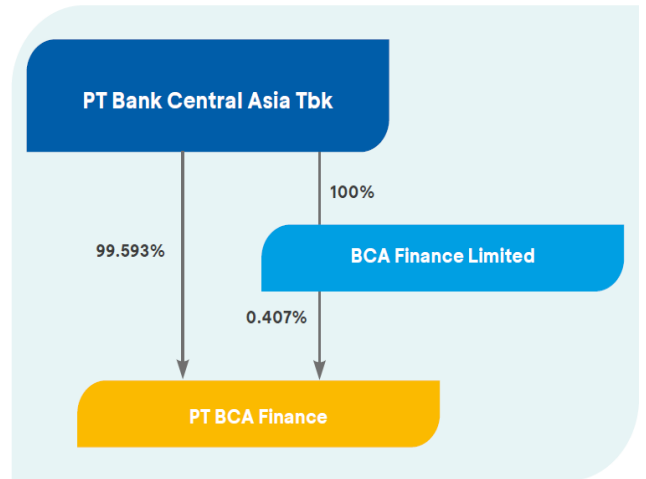


- SHARE OWNERSHIP STRUCTURE OF PT BCA FINANCE**

January 1 – August 31, 2024

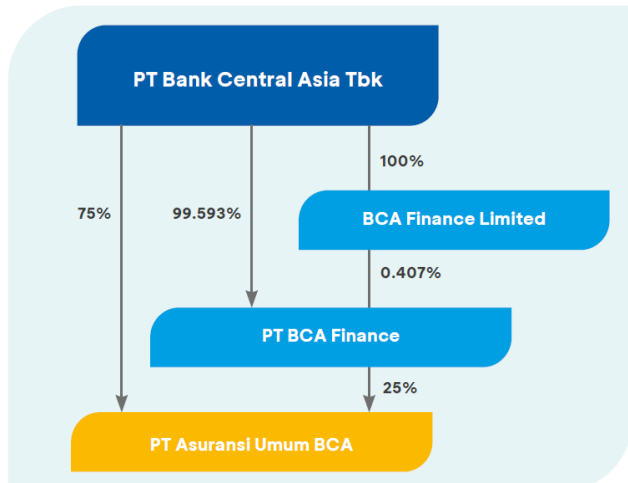


As of September 1, 2024^{*)}

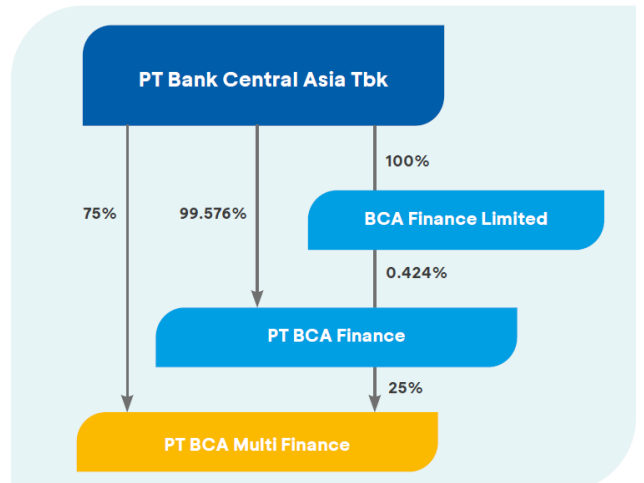


*) Effective date of merger of PT BCA Multi Finance into PT BCA

- SHARE OWNERSHIP STRUCTURE OF PT ASURANSI UMUM BCA AS OF DECEMBER 31, 2024**

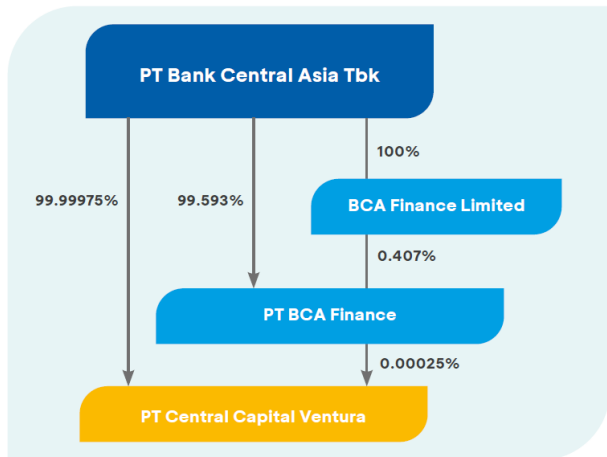


- SHARE OWNERSHIP STRUCTURE OF PT BCA MULTI FINANCE AS OF JANUARY 1 – AUGUST 31, 2024^{**)}**

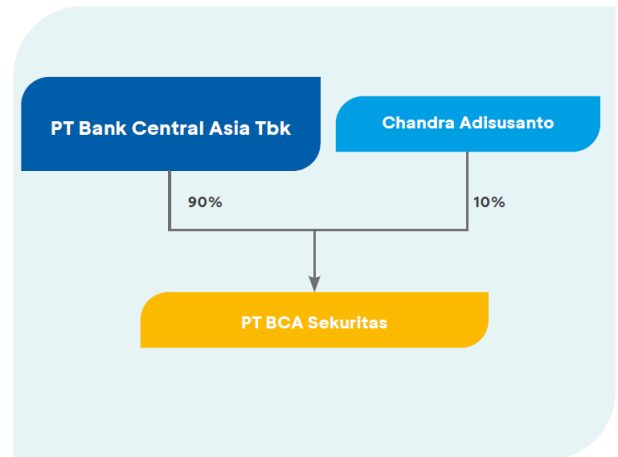


***) As of September 1, 2024, PT BCA Multi Finance effectively merged into PT BCA Finance.

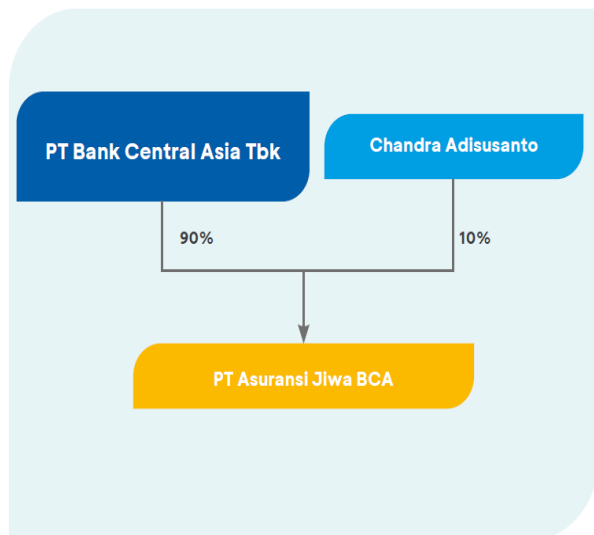
- **SHARE OWNERSHIP STRUCTURE OF PT CENTRAL CAPITAL VENTURA AS OF DECEMBER 31, 2024**



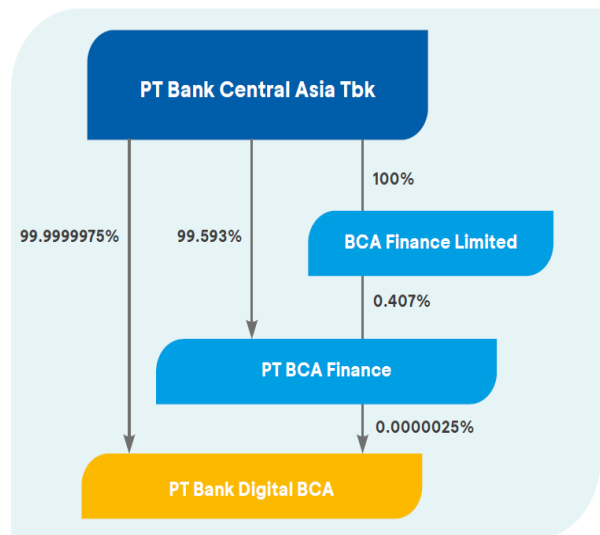
- **SHARE OWNERSHIP STRUCTURE OF PT BCA SEKURITAS AS OF DECEMBER 31, 2024**



- **SHARE OWNERSHIP STRUCTURE OF PT ASURANSI JIWA BCA AS OF DECEMBER 31, 2024**



- **SHARE OWNERSHIP STRUCTURE OF PT BANK DIGITAL BCA AS OF DECEMBER 31, 2024**



IV. MANAGEMENT STRUCTURE IN MAIN ENTITY AND FINANCIAL SERVICES INSTITUTION (Subsidiaries) OF BCA'S FINANCIAL CONGLOMERATE

MANAGEMENT STRUCTURE OF PT BANK CENTRAL ASIA TBK (MAIN ENTITY) AS OF DECEMBER 31, 2024

BOARD OF COMMISSIONERS	
Position	Name
President Commissioner	Djohan Emir Setijoso
Commissioner	Tonny Kusnadi
Independent Commissioner	Cyrillus Harinowo
Independent Commissioner	Raden Pardede
Independent Commissioner	Sumantri Slamet

BOARD OF DIRECTORS	
Position	Name
President Director	Jahja Setiaatmadja
Deputy President Director 1	Gregory Hendra Lembong
Deputy President Director 2	Armand Wahyudi Hartono
Director	Tan Ho Hien/Subur atau Subur Tan
Director	Rudy Susanto
Director (concurrently Director in charge of the Compliance function)	Lianawaty Suwono
Director	Santoso
Director	Vera Eve Lim
Director	Haryanto T. Budiman
Director	Frengky Chandra Kusuma
Director	John Kosasih
Director	Antonius Widodo Mulyono

Main Entity Board of Commissioners and Board of Directors Duties and Responsibilities

1. Duties and responsibilities of the Main Entity's Board of Commissioners:

- a. Supervise the implementation of Integrated Governance.
- b. In order to supervise the implementation of Integrated Governance as mentioned above, at least:
 - 1) Supervise the implementation of governance in each Subsidiary so that it is in accordance with the Integrated Governance Guidelines;
 - 2) Supervise the implementation of duties and responsibilities of the Main Entity's Board of Directors, as well as provide directions or advice to the Main Entity Board of Directors on the implementation of the Integrated Governance Guidelines; and
 - 3) Evaluate the Integrated Governance Guidelines and direct their implementation for improvement.
- c. Hold regular meetings at least once every semester. Meetings can be held via video conference.
- d. Stated results of the meeting in the minutes of meeting and documented properly, as well as clearly stating the dissenting opinion that occurred at the meeting in the minutes of meeting along with the reasons for the dissent.
- e. Form Integrated Governance Committee.

2. Duties and responsibilities of the Main Entity Board of Directors:

- a. Ensure the implementation of Integrated Governance in the Financial Conglomeration.
- b. In order to ensure Integrated Governance implementation as mentioned above, at least:
 - 1) Formulate Integrated Governance Guidelines;

- 2) Direct, monitor, and evaluate the implementation of Integrated Governance Guidelines; and
 - 3) Follow up on the directions or advice of the Main Entity's Board of Commissioners in order to improve Integrated Governance Guidelines.
- c. Ensure that audit findings and recommendations from the Integrated Internal Audit Work Unit, external auditors, and results of Financial Services Authority supervision and/or monitoring results from other authorities have been followed-up by Subsidiaries.

MANAGEMENT STRUCTURE OF FSI IN THE FINANCIAL CONGLOMERATE OF BCA

MANAGEMENT STRUCTURE OF BCA FINANCE LIMITED AS OF DECEMBER 31, 2024

BOARD OF DIRECTORS	
Position	Name
Director	Andy Kwok Sau Lai
Director	Fanny Surjadi
Director	Janto Havianto

MANAGEMENT STRUCTURE OF PT BCA FINANCE AS OF JANUARY 1 – AUGUST 31, 2024

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Suwignyo Budiman	President Director	Roni Haslim
Commissioner	David Hamdan	Director	Petrus Santoso Karim
Independent Commissioner	Sulistiyowati	Director	Lim Handoyo
		Director	Sugito Lie
		Director	Liston Nainggolan
		Director	Tan, Widy Tarmizi*)

*) Effective serving from May 2, 2024

MANAGEMENT STRUCTURE OF PT BCA FINANCE AS OF SEPTEMBER 1, 2024*)

*) Effective date of merger of PT BCA Multi Finance into PT BCA.

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Suwignyo Budiman	President Director	Roni Haslim
Commissioner	David Hamdan	Director	Petrus Santoso Karim
Independent Commissioner	Sulistiyowati	Director	Lim Handoyo
		Director	Sugito Lie
		Director	Liston Nainggolan
		Director	Tan, Widy Tarmizi
		Director	Herwandi Kuswanto

MANAGEMENT STRUCTURE OF PT BANK BCA SYARIAH AS OF DECEMBER 31, 2024

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Ratna Yanti	President Director	Yuli Melati Suryaningrum
Commissioner	Rickyadi Widjaja	Director in Charge of Compliance Function	Houda Muljanti
Independent Commissioner	Inge Setiawati	Director	Pranata
		Director	Lukman Hadiwijaya
		Director	Ina Widjaja

SHARIA SUPERVISORY BOARD

Position	Name
Chairman	Prof. DR. H. Fathurrahman Djamil, MA
Member	Sutedjo Prihatono

MANAGEMENT STRUCTURE OF PT ASURANSI UMUM BCA AS OF DECEMBER 31, 2024

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Petrus Santoso Karim	President Director	Hendro Hadinoto Wenan
Commissioner	Jacobus Sindu Adisuwono	Director	Antonius
Independent Commissioner	Gustiono Kustianto	Director	Sri Angraini
Independent Commissioner	Gunawan Budi Santoso	Director	Erik Surjadi ^{*)}
		Director of Compliance	Arif Singgih Halim Wijaya

*) Effective serving from May 1, 2024

MANAGEMENT STRUCTURE OF PT BCA MULTI FINANCE AS OF JANUARY 1 – AUGUST 31, 2024^{***)}

***) As of September 1, 2024, PT BCA Multi Dinance effectively merged into PT BCA Finance

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Roni Haslim	President Director	Herwandi Kuswanto
Commissioner	Hermanto	Director	Adhi Purnama
Independent Commissioner	Mathilda Simon	Director	Suiman Agung
		Director	Rudy Setiawan ^{*)}

*) Has effectively resigned from his position as Director of PT BCA Multi Finance on May 30, 2024.

MANAGEMENT STRUCTURE OF PT CENTRAL CAPITAL VENTURA

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
Commissioner	Jan Hendra	President Director	Armand Widjaja
		Director	Adi Prasetyo Susilo

MANAGEMENT STRUCTURE OF PT BCA SEKURITAS AS OF DECEMBER 31, 2024

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Dharwin Yuwono	President Director	Mardi Henko Sutanto
Independent Commissioner	Ir. Hendra Iskandar Lubis	Director	Imelda Arismunandar

MANAGEMENT STRUCTURE OF PT ASURANSI JIWA BCA AS OF DECEMBER 31, 2024

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Hariyanto	President Director	Christina Wahjuni Setyabudhi
Commissioner	Ugahary Yovvy Chandra ^{*)}	Director	Yannes Chandra
Commissioner	Mathilda Simon ^{**)}	Director of Compliance	Ir. Sukawati Lubis
Independent Commissioner	Pudjianto	Director	Eva Agrayani Tjong
Independent Commissioner	Hardjono		

*) Served until September 3, 2024

**) Effective serving from September 3, 2024

MANAGEMENT STRUCTURE OF PT BANK DIGITAL BCA AS OF DECEMBER 31, 2024

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Position	Name	Position	Name
President Commissioner	Theresia Endang Ratnawati	President Director	Lanny Budiati
Independent Commissioner	Ina Suwandi	Director	Iman Sentosa
Independent Commissioner	Daniel Gunawan	Director of Compliance	Nugroho Budiman

Duties and responsibilities of the Board of Commissioners, the Board of Directors, and the Sharia Supervisory Board of FSI in Financial Conglomerate of BCA

1. The duties and responsibilities of the Board of Commissioners of FSI in BCA's Financial Conglomerate include at least the following:
 - a. Supervise the implementation of the governance, duties, and responsibilities of the Board of Directors and follow up on audit results from internal and external parties;
 - b. Form committees or appoint parties to carry out functions that support the Board of Commissioners' duties and responsibilities, at least audit monitoring committees or functions and compliance monitoring committees or functions;
 - c. Hold Board of Commissioners meetings that include at least the frequency, attendance, and decision making procedures; and
 - d. Set out work rules for the Board of Commissioners.
2. The duties and responsibilities of the FSI's Board of Directors in BCA's Financial Conglomerate include at least the following:
 - a. Implement the principles of Subsidiary Governance;
 - b. Follow up on audit results by internal and external parties;
 - c. Set out work rules; and
 - d. Organize meetings of the Board of Directors that at least include procedures for making decisions and meeting documentation.
3. The duties and responsibilities of the FSI's Sharia Supervisory Board in BCA's Financial Conglomerate, include at least the following:
 - a. Provide advice and suggestions to the Board of Directors and supervise the activities of Bank BCA Syariah so that they comply with Sharia Principles; and
 - b. Set out work rules for the Sharia Supervisory Board.

Integrated Governance Structure in the BCA Financial Conglomerate

Entity	IG Committee ^{*)}	Compliance Function	Internal Audit Function	Risk Management Function
PT BCA Tbk (Main Entity) ^{**)}	√	√	√	√
BCA Finance Limited	-	√	√	√
PT BCA Finance	-	√	√	√
PT Bank BCA Syariah	-	√	√	√
PT Asuransi Umum BCA	-	√	√	√
PT BCA Multi Finance ^{***)}	-	√	√	√
PT Central Capital Ventura	-	√	√	√
PT BCA Sekuritas	-	√	√	√
PT Asuransi Jiwa BCA	-	√	√	√
PT Bank Digital BCA	-	√	√	√

^{*)} The IG Committee must only be formed in the Main Entity with members including representatives of Independent Commissioners and/or members of the Sharia Supervisory Board from each FSI in the BCA Financial Conglomerate.

^{**)} BCA as the main entity has an Integrated Compliance function, Integrated Internal Audit function and Integrated Risk Management function.

^{***)} PT BCA Multi Finance has merged into PT BCA Finance on September 1, 2024.

Integrated Governance Committee (IGC)

Based on the Decree of the Board of Commissioners No. 037/SK/KOM/2015 concerning the Establishment of the Integrated Governance Committee dated February 26, 2015, BCA has formed IGC consisting of representatives of BCA Independent Commissioners, Independent Parties, and all representatives of Independent Commissioners and/or Members of the Sharia Supervisory Board of Subsidiaries. The IGC is tasked with assisting the Board of Commissioners of BCA as the Main Entity in supervising the implementation of Integrated Governance in BCA's Financial Conglomeration.

In 2024, adjustments have been made to the IGC members due to changes in the composition of the Subsidiary's Board of Commissioners. The following is the composition of the IGC members as of December 31, 2024.

Composition of the IGC Members

Name	Position in the Committee ¹⁾	Position in the Financial Conglomeration	Term of Office
Member from the Main Entity			
Cyrrillus Harinowo	Chairman (concurrently member)	Main Entity's Independent Commissioner	May 6, 2021 – 2026 AGMS
Prabowo	Member	Main Entity's Independent Party ^{**)}	May 6, 2021 – 2026 AGMS
Member from the Subsidiary^{***)}			
Sulistiyowati	Member	Independent Commissioner PT BCA Finance	May 6, 2021 – 2026 AGMS
Gustiono Kustianto	Member	Independent Commissioner PT Asuransi Umum BCA	May 6, 2021 – 2026 AGMS
Pudjianto	Member	Independent Commissioner PT Asuransi Umum BCA	May 6, 2021 – 2026 AGMS
Mathilda Simon	Member	Independent Commissioner PT BCA Multi Finance	September 14, 2023 – September 1, 2024
Ratna Yanti	Member	Independent President Commissioner PT Bank BCA Syariah	March 10, 2023 – 2026 AGMS
Sutedjo Prihatono ¹⁾	Member	Member of the Sharia Supervisory Board of PT Bank BCA Syariah	May 6, 2021 – 2026 AGMS
Hendra Iskandar Lubis	Member	Independent Commissioner PT BCA Sekuritas	May 6, 2021 – 2026 AGMS
Janto Havianto	Member	Independent Director BCA Finance Limited, Hongkong	June 20, 2024 – 2026 AGMS
Ina Suwandi	Member	Independent Commissioner PT Bank Digital BCA	September 14, 2023 – 2026 AGMS

Note:

¹⁾ Membership of Independent Commissioners, Independent Parties, and Members of the Sharia Supervisory Board in the IGC of the Financial Conglomerate is not counted as concurrent positions.

^{**)} Members of the IGC who are independent parties are appointed by the Main Entity's Board of Commissioners.

^{***)} Appointment of IGC members who are Independent Commissioners and/or Members of the Sharia Supervisory Board who represent FSI in the BCA's Financial Conglomerate is based on the appointment of each FSI

Integrated Compliance Work Unit

BCA, as the Main Entity in the BCA Financial Conglomeration, has added an integrated compliance function within the Compliance Division (DCP) organization to monitor and evaluate the implementation of the compliance function at each FSI in the BCA Financial Conglomeration through coordination with the compliance function in each Subsidiary Company.

The Integrated Compliance and Gratification Control aspect has the following duties and responsibilities:

- a. Monitor and evaluate compliance function implementation in each Subsidiary Company.

- b. In the context of implementing integrated risk management, assess and develop an integrated compliance risk profile.
- c. In the context of implementing integrated risk management, assess and develop an integrated compliance risk profile.
- d. Prepare and submit reports to the Main Entity Compliance Director on the implementation of integrated compliance duties and responsibilities. Afterwards, the Main Entity's Compliance Director prepares and submits a report to the Main Entity's Board of Directors and Board of Commissioners on the implementation of integrated compliance duties and responsibilities.

Integrated Internal Audit Work Unit

BCA has an Integrated Internal Audit Work Unit function, which is carried out by the Internal Audit Division, guided by OJK Regulation No. 1/POJK.03/2019 dated January 28, 2019, concerning Implementation of the Internal Audit Function in Commercial Banks, and OJK Regulation concerning the Implementation of Integrated Governance in order to support the Financial Conglomerate. To monitor the implementation of the internal audit function at each FSI in the BCA Financial Conglomerate and provide recommendations that have added value.

The Integrated Internal Audit Work Unit has the following duties and responsibilities:

- a. Assess the adequacy and effectiveness of risk management processes, internal control, and governance of Subsidiaries, and provide recommendations for improvement.
- b. Monitor the implementation of internal audits at each Subsidiary.
- c. Monitor and evaluate the adequacy of corrective follow-up on the audit results of Subsidiaries, and report them to the Board of Directors, Board of Commissioners and Main Entity Audit Committee.
- d. Submit an integrated internal audit report to the Director appointed to carry out the oversight function of Subsidiaries, the Board of Commissioners of the and the Director in charge of the compliance function of the Main Entity.
- e. Provide support to Subsidiaries in developing the internal audit function.

Implementation of Integrated Risk Management

In accordance with OJK Regulation No. 17/POJK.03/2014 concerning the Implementation of Integrated Risk Management (hereinafter referred to as "OJK Regulation concerning the Implementation of Integrated Risk Management"), BCA and Subsidiaries in the Financial Conglomerate of BCA have implemented integrated risk management in a comprehensive and effective manner in accordance with the characteristics and complexity of the Financial Conglomerate business.

In order to implement integrated risk management, BCA, as the Main Entity, has formed an Integrated Risk Management Committee (IRMC) and added an integrated risk management function to the Risk Management Division.

- The IRMC consists of the Director of BCA, who is in charge of the integrated risk management function as chairman, all members of the Board of Directors of BCA, several other relevant BCA senior managements, as well as the Director of Subsidiaries as a representative of FSI in the BCA Financial Conglomerate.
- In carrying out its functions, IRMC is also supported by an integrated risk management function within the Risk Management Division organization to ensure that the risks faced by the Main Entity and Subsidiaries can be identified, measured, monitored, controlled, and reported in an integrated manner in accordance with the risk management framework, as well as dealing with emergency situations that threaten the bank's business continuity.

V. INTRA-GROUP TRANSACTION POLICY

As the Main Entity of the Financial Conglomerate, BCA is required to manage intra-group transaction risk and monitor intra-group transactions in an integrated manner.

Definition of Intra-Group Transaction Risk

Intra-group transaction risk is the risk resulting from the dependence of an entity, either directly or indirectly, toward other entities in a Financial Conglomerate in order to fulfill written and unwritten agreement obligations followed by a transfer of funds and/or not followed by a transfer of funds.

Objectives of Intra-Group Transaction Risk Management

The main objectives of intra-group transaction risk management are:

- a. Regulate and supervise intra-group transactions based on the principle of prudence.
- b. Ensure that the risk management process can minimize the possibility of negative impacts resulting from the dependence of an FSI, either directly or indirectly, toward other FSIs in a Financial Conglomerate.

Intra-Group Transaction Risk

Intra-group transaction risks may arise, among other from:

- a. Cross-ownership among FSI in the Financial Conglomerate.
- b. Centralized short-term liquidity management.
- c. Collateral, loans, and commitments given or obtained by an FSI from another FSI in the Financial Conglomerate.
- d. Exposures to controlling shareholders, including loan and off-balance sheet exposures, such as collateral and commitments.
- e. Purchase or sale of assets to other FSI in a Financial Conglomerate.
- f. Transfer of risk through reinsurance.
- g. Transactions to divert third party risk exposure among FSI in the Financial Conglomerate.

Scope of Intra-Group Transaction Risk Management Policy

The implementation of intra-group risk management in the Financial Conglomerate includes:

1. Oversight of the Board of Commissioners and the Board of Directors

Oversight by the Board of Commissioners and the Board of Directors is required to ensure the effectiveness of intra-group transaction risk management implementation and compliance with applicable regulations.

- a. **The Board of Commissioners' authorities and responsibilities in implementing intra-group transaction risk management include:**
 - 1) Approve the intra-group transaction risk management policy.
 - 2) Evaluate the Board of Directors' accountability and provide guidance for improving the implementation of intra-group transaction risk management policies.
- b. **The authorities and responsibilities of the Board of Directors in managing intra-group transaction risk include the following:**
 - 1) Understand the risks of intra-group transactions inherent in the Financial Conglomeration.
 - 2) Develop and establish intra-group transaction risk management policies.
 - 3) Accountable for implementing intragroup transaction risk management.
 - 4) Ensure that each entity in the Financial Conglomerate implements intragroup transaction risk management.
 - 5) Monitor the risk of intra-group transactions on a regular basis.

- 6) Develop a risk culture as part of the implementation of intra-group transaction risk management.
- 7) Ensuring that the implementation of intragroup transaction risk management is free from conflicts of interest between the Financial Conglomerate and individual FSI.

2. Adequacy of Policies, Procedures and Determination of Intra-Group Transaction Risk Limits

Stipulation of intra-group transaction policies, procedures, and risk limits, taking into consideration the following factors:

- a. The financial conglomerates must ensure compliance with the arm's length principle (transaction fairness) pertaining to intra-group transactions.
- b. The level of risk to be taken (risk appetite) and the level of risk tolerance must be in line with the Financial Conglomerate's business strategy, risk profile, and capital plan.
- c. Intra-group transaction policies and limits are in accordance with applicable regulatory requirements.
- d. The intra-group transaction risk management procedures must include at least the following:
 - 1) Accountability and clear levels of delegation of authority in intragroup transaction risk management implementation.
 - 2) Review of procedures in a regular basis.
 - 3) Adequate procedure documentation, namely written documentation that is complete and allows for an easy audit trail.

3. Adequacy of Risk Identification, Measurement, Monitoring and Control Processes, as well as Intra-Group Transaction Risk Management Information Systems

BCA, as the Main Entity, has carried out an integrated process of identifying, measuring, monitoring, and controlling risks for all significant risk factors, taking into consideration the following factors:

- a. The Financial Conglomerate's intra-group transaction composition.
- b. Transaction documentation and fairness.
- c. Comply with legal and regulatory requirements.
- d. Other significant information.

The implementation is also supported by an intragroup transaction risk management information system, which includes an intra-group transaction risk profile report as part of the Integrated Risk Profile Report.

Review of Intra-Group Transaction Risk Profile

Based on its self-assessment, BCA's risk profile rating for both its individual and integrated assessments with its subsidiaries in 2024 is "low to moderate".

This risk profile rating is based on the assessment of inherent risk as "low to moderate" and the evaluation of risk management implementation quality as "satisfactory."

4. Comprehensive Internal Control System for Intra-Group Transaction Risk Management Implementation

A comprehensive internal control system is required to supplement the process of implementing effective intergroup transaction risk management.

BCA has implemented an effective internal control system for intra-group transaction risk with the following provisions:

- a. Refers to the established policies and procedures.
- b. The internal control system is developed to ensure:

- 1) Compliance with internal policies or provisions as well as laws and regulations.
- 2) The effectiveness of the risk culture in the Financial Conglomerate organization as a whole in early identification of flaws and deviations and continuously reassessing the fairness of existing policies and procedures in the Financial Conglomerate.
- c. Review of the measurement of intergroup transaction risk, which at least covering:
 - 1) Conformity of policies, organizational structure, allocation of resources, design of intergroup transaction risk management processes, information systems, and risk reporting according to the business needs of the Financial Conglomerate, as well as the development of regulations and best practices related to intra-group transaction risk management.
 - 2) Complete and adequate documentation of coverage, operational procedures, audit findings, and the Financial Conglomerate management responses based on the audit results.

VI. IMPLEMENTATION CORPORATE GOVERNANCE REPORT OF BCA

1. Transparency of Good Corporate Governance Implementation as referred by point IX Financial Services Authority Circular Letter Number 13/SEOJK.03/2017 dated 17 March 2017

A. THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS

1) Implementation of Duties and Responsibilities of the Board of Directors and the Board of Commissioners

a) Number, Composition, Criteria, and Independence of Members of the Board of Directors and the Board of Commissioners

The Board of Directors

Number and Composition of Members of the Board of Directors

BCA has complied with the provisions for the number and composition of members of the Board of Directors in accordance with OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, which governs that banks are required to have at least 3 (three) members of the Board of Directors.

As of December 31, 2024, the number of members of the Board of Directors of BCA is 12 (twelve) consisting of:

- 1 (one) President Director;
- 2 (two) Deputy President Director;
- 1 (one) Compliance Director; and
- 8 (eight) Other Directors.

From the composition above, BCA has a member of the Board of Directors who is also the Director in charge of the compliance function. The President Director comes from a party that is independent of the Controlling Shareholders.

Throughout 2024, there were no changes to the membership composition of the BCA Board of Directors, so that in this Annual Report BCA does not present the reasons for the change in the composition of the Board of Directors. The composition of the BCA Board of Directors membership for 2024 has been included in the Deed of Statement of Meeting Decisions of PT Bank Central Asia Tbk No. 33 dated May 10 2022, made in the presence of Christina Dwi Utami, S.H., M.Hum., M.Kn., Notary in Jakarta.

Composition of BCA Board of Directors members for the as of 31 December 2024

Composition of BCA Board of Directors members

Name	Position	Approval Letter No.	Term of Office Based on AGMS
Jahja Setiaatmadja	President Director	13/21/DPBB3/TPB3-7 dated June 17, 2011	2021 - 2026
Gregory Hendra Lembong	Deputy President Director	10/KDK.03/2022 dated April 22, 2022	2022 - 2026
Armand Wahyudi Hartono	Deputy President Director	SR-106/D.03/2016 dated June 21, 2016	2021 - 2026
Tan Ho Hien/Subur/Subur Tan	Director	4/69/DpG/DPIP/Rahasia dated August 13, 2002	2021 - 2026
Rudy Susanto	Director	SR-119/D.03/2014 dated July 21, 2014	2021 - 2026
Lianawaty Suwono ^{*)}	Director (concurrently Director in charge of Compliance function)	SR-137/D.03/2016 dated July 27, 2016	2021 - 2026
Santoso	Director	SR-143/D.03/2016 dated August 8, 2016	2021 - 2026
Vera Eve Lim	Director	SR-79/PB.12/2018 dated April 23, 2018	2021 - 2026
Haryanto T. Budiman	Director	14/KDK.03/2020 dated May 14, 2020	2021 - 2026
Frengky Chandra Kusuma	Director	39/KDK.03/2021 dated April 26, 2021	2021 - 2026
John Kosasih	Director	40/KDK.03/2021 dated April 26, 2021	2021 - 2026
Antonius Widodo Mulyono	Director	9/KDK.03/2022 dated April 22, 2022	2022 - 2026

Note:

*) Based on OJK Letter No. 8/KDK.03/2022 dated April 22, 2022, OJK approved the appointment of Ms. Lianawaty Suwono as Director in charge of Compliance Function.

Before carrying out their duties and functions in their positions, all members of BCA's Board of Directors have obtained approval from Bank Indonesia and/or Financial Services Authority and passed the fit and proper test from Bank Indonesia and/or Financial Services Authority. This is in accordance with BI Regulation No. 12/23/PBI/2010 concerning Fit and Proper Test and BI Circular Letter No. 13/8/DPNP concerning Fit and Proper Test as amended by Bank Indonesia Circular Letter No. 13/26/DPNP dated November 30, 2011 and Financial Services Authority Regulation No.27/POJK.03/2016 concerning Fit and Proper Test for Main Parties of Financial Services Institutions. In addition, since supervision in the banking sector shifted from Bank Indonesia to Financial Services Authority on December 31, 2013, the fit and proper test process for the Board of Directors after that date was carried out by Financial Services Authority.

Terms of Office of the Board of Directors

Since the holding of the GMS that appointed relevant members of the Board of Directors, the terms of office for the BCA Board of Directors will end at the closing of the 5th GMS, without prejudice the authority of GMS to dismiss one or more members of the Board of Directors any time before the position ends. BCA Article of Association state that members of the Board of Directors whose terms of office has ended can be reappointed.

Criteria for Members of the Board of Directors

Members of the Board of Directors of BCA are individuals who meet the criteria and requirements in accordance with OJK Regulation No. 33/ POJK.04/2014 concerning Board of Directors and Board of Commissioners of Issuers or Public Companies, OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, OJK Regulation No. 27/POJK.03/2016 concerning Fit and Proper Test for the Main Parties of The Financial Services Institutions and OJK Regulation concerning the Implementation of Governance for Commercial Banks. The criteria for members of the Board of Directors can also be seen in the Board of Directors Charter, which can be accessed by public through the BCA website under the Organizational Structure section (<https://www.bca.co.id/en/tentang-bca/tatakelola/struktur-organisasi>).

Criteria for members of the Board of Directors are as follows:

- 1) Good ethics, morals, and integrity.
- 2) Capable of performing legal actions.
- 3) Within 5 (five) years before appointment and during the term of office:
 - a. Has not been convicted for committing a crime detrimental to the state finances or relating to the financial sector; and
 - b. Has not been a member of the Board of Directors and/or Board of Commissioners in which during his/her terms of office:
 - Did not hold an Annual GMS;
 - His/Her accountability as members of the Board of Directors and/or members of the Board of Commissioners has never been accepted by the GMS or has failed to provide accountability as members of the Board of Directors and/or members of the Board of Commissioners to the GMS; and
 - Have caused a company that has obtained a license, approval, or registration from OJK to fail to fulfill its obligation to submit annual reports and/or financial reports to OJK;
- 4) Has a commitment to comply with laws and regulations.
- 5) Has knowledge and/or expertise in the fields required by BCA.
- 6) Meet the integrity requirements, which includes:
 - a. Capable of performing legal actions, the definition of being able to perform legal actions refers to the Civil Code;
 - b. Has good characters and morals, at least demonstrated by the attitudes that comply with prevailing provisions, including have never been convicted to criminal offense in a certain period before being nominated; What is meant by “criminal acts” as referred above are:
 - Criminal acts in the financial services sector whose crimes were completed within the last 20 (twenty) years before being nominated;
 - Criminal offenses, namely crimes listed in the Criminal Code (KUHP) and/or similar Criminal Code abroad, with threat of criminal punishment of imprisonment for 1 (one) year or more, whose sentence was completed within the last 10 (ten) years prior being nominated; and/or
 - Other criminal acts with threat of criminal punishment of 1 (one) year imprisonment or more, including corruption, money laundering, narcotics/psychotropics, smuggling, customs, excise, human trafficking, illegal weapons trade, terrorism, counterfeiting money, in the field of taxation, forestry, environment, maritime affairs, and fisheries, whose sentence was completed

- within the last 20 (twenty) years prior to nomination;
- c. Has a commitment to comply with laws and regulations and support the Financial Services Authority policies;
 - d. Has a commitment to the development of a healthy Bank;
 - e. Not included as a party prohibited from becoming a Main Party, among others, is a candidate not listed on the Disqualified List (DTL) for the fit and proper test. In accordance with regulations related to the fit and proper test, the Main Parties include Controlling Shareholders, members of the Board of Directors and members of the Board of Commissioners;
 - f. Has a commitment not to commit and/or repeat actions and/or deeds that would disqualify the person from becoming the Main Party.
- 7) Meet the competency requirements, which include:
- a. Adequate and relevant banking knowledge for the position. Knowledge in the banking sector includes, among other things, understanding of bank regulations and operations, as well as risk management;
 - b. Knowledge of the roles and responsibilities of the main entity and understanding of the main business activities and main risks of Financial Services Institutions in a financial conglomerate;
 - c. Experience in banking and/or finance, including experience in operations, marketing, accounting, auditing, funding, credit, money market, capital market, law, or experience in supervision of Financial Services Institutions;
 - d. The ability to carry out strategic management in the context of developing a healthy bank;
 - e. Has experience of at least 5 (five) years in the field of operations and at the minimum level as a Bank Executive Officer.
- 8) Meet the financial reputation requirements, which include:
- a. Does not have bad credit and/or bad financing; and
 - b. Has never been declared bankrupt or have never been a shareholder, an Insurance Company Controller who is not a shareholder, a member of the Board of Directors or a member of the Board of Commissioners who was found guilty of causing a company to be declared bankrupt, within the last 5 (five) years before being nominated.

Independence of Board of Directors

Majority of members of BCA's Board of Commissioners and Board of Directors do not have affiliated relationship, either financial relationship or family relationship among other members of Board of Commissioners, Board of Directors, and Controlling Shareholders. In addition, the majority of members of BCA's Board of Directors do not have conflicts of interest and/or relationships with BCA that affect their ability to act independently and perform their duties professionally and objectively.

The Board of Commissioners

Number and Composition of the Members of the Board of Commissioners

As of December 31, 2024, BCA has 5 (five) members on the Board of Commissioners, consisting of:

- 1 (one) President Commissioner,
- 1 (one) Commissioner, and
- 3 (three) Independent Commissioners.

The number of members of the BCA Board of Commissioners does not exceed the number of

members of the BCA Board of Directors. The number of BCA Independent Commissioners is 3 (three) or 60% (sixty percent) of the total members of the BCA Board of Commissioners.

In 2024, there were no changes to the composition of the Board of Commissioners; therefore, BCA does not provide reasons for changes to the composition of the Board of Commissioners in this Annual Report. The composition of the membership of the BCA Board of Commissioners is set out in the Deed of BCA Meeting Decision Statement No. 33 dated May 10, 2022, made in the presence of Christina Dwi Utami, S.H. M.Hum., M.Kn., Notary in Jakarta.

The Composition of BCA Board of Commissioners as of December 31, 2024

Name	Position	Approval Letter No.	Term of Office
Djohan Emir Setijoso	President Commissioner	13/99/GBI/DPIP/Rahasia dated August 25, 2011	2021 - 2026
Tonny Kusnadi	Commissioner	5/4/DpG/DPIP/Rahasia dated September 4, 2003	2021 - 2026
Cyrillus Harinowo	Independent Commissioner	5/4/DpG/DPIP/Rahasia dated September 4, 2003	2021 - 2026
Raden Pardede	Independent Commissioner	8/84/DPB3/TPB3-2 dated August 16, 2006	2021 - 2026
Sumantri Slamet	Independent Commissioner	SR-117/D.03/2016 dated July 11, 2016	2021 - 2026

In connection with the receipt of Mr. Djohan Emir Setijoso's resignation letter from his position as President Commissioner of BCA on December 16, 2024, BCA has made an information disclosure on December 17, 2024 to comply with the provisions of Article 27 jo. Article 9 POJK No. 33/POJK.04/2014 concerning Directors and Board of Commissioners of Issuers or Public Companies jis. Article 2 paragraph (1) POJK No. 31/POJK.04/2015 regarding Disclosure of Information or Material Facts by Issuers or Public Companies and Provision III.2.1.1 Attachment to the Decree of the Board of Directors of PT Bursa Efek Indonesia Number Kep-00066/BEI/09-2022 regarding Amendments to Regulation Number I-E regarding Obligation to Submit Information.

All members of the Board of Commissioners of BCA have obtained approval and passed the fit and proper test from Bank Indonesia (currently the OJK) before carrying out their duties and functions. This is in accordance with Bank Indonesia Regulation No. 12/23/PBI/2010 concerning Fit and Proper Test and Bank Indonesia Circular Letter No. 13/8/DPNP concerning Fit and Proper Test as amended by Bank Indonesia Circular Letter No. 13/26/DPNP dated November 30, 2011.

Term of Office of the Board of Commissioners

In accordance with BCA's Articles of Association, the term of office of members of the Board of Commissioners is 5 (five) years from the date specified in the GMS. The term of office of the members of the Board of Commissioners for this period will end when BCA Annual GMS is closed in 2026. The GMS still has the authority to dismiss one or more members of the Board of Commissioners at any time before its term ends.

The term of office of a member of the Board of Commissioners automatically ends if the person concerned:

- Declared bankrupt or placed under jurisdiction based on a court decision;
- Resign from his position in accordance with applicable regulations;
- Deceased;

- Dismissed based on the General Meeting of Shareholders;
- No longer meets applicable statutory requirements.

BCA has Independent Commissioners who have been appointed for more than 2 (two) periods, namely Cyrillus Harinowo and Raden Pardede. Based on the meeting of the members of the Board of Commissioners, both of them can still act independently, and each has made a Statement of Independence, which is declared at the appointment of members of the Independent Commissioners at the 2021 BCA Annual GMS.

Criteria for the Members of the Board of Commissioners

Members of the Board of Commissioners of BCA are individuals who meet the criteria and requirements in accordance with the Board of Commissioners' Charter which can be downloaded in the Organizational Structure Section of the BCA website (<https://www.bca.co.id/en/tentang-bca/tata-kelola/strukturorganisasi>).

The criteria for the Board of Commissioner members are as follows:

- 1) Have good character, morals and integrity.
- 2) Be competent in carrying out legal actions.
- 3) Within 5 (five) years before appointment and during their tenure:
 - a. Have never been convicted of a criminal offense that is detrimental to the state finances and/or related to the financial sector; and
 - b. Have never been a member of the Board of Directors and/or a member of the Board of Commissioners who during their tenure:
 - Not held an Annual GMS;
 - Accountability as a member of the Board of Directors and/or a member of the Board of Commissioners has been rejected by the GMS or does not provide accountability as a member of the Board of Directors and/or a member of the Board of Commissioners to the GMS; and
 - Had caused a company that has obtained permits, approvals, or registrations from Financial Services Authority fail to comply its obligation to submit annual reports and/or financial statements to Financial Services Authority.
- 4) Has a commitment to comply with laws and regulations.
- 5) Has knowledge and/or expertise in the fields required by BCA.
- 6) Meet the following requirements for integrity, competence and financial reputation:
 - a. Integrity requirements, including:
 - Capable of carrying out legal actions;
 - Has good character and morals, at least shown by the attitude of complying with applicable provisions, including have never been convicted for a crime in a certain period before being nominated;
 - Has a commitment to comply with laws and regulations and uphold Financial Services Authority policies;
 - Has a commitment towards the development of a healthy financial services institution;
 - Not included as a party prohibited from being a main party;
 - Have a commitment not to commit and/or repeat actions and/or activity that cause the person concerned to be included as a party prohibited from becoming a Main Party.
 - b. Competency requirements, including:
 - Knowledge in banking which is adequate and relevant to the position;

- Experience and expertise in banking and/or financial sector.
- c. Financial reputation requirements, at least evidenced by:
- Not having bad credit and/or nonperforming loan; and
 - Has never been declared bankrupt and/or has never been a shareholder, controller of an insurance company who is not a shareholder, a member of the Board of Directors, or a member, of the Board of Commissioners found guilty of causing a company to be declared bankrupt within the last 5 (five) years before being nominated.
- d. Has passed the Fit and Proper Test in accordance with Financial Services Authority Regulations.

The criteria that need to be met by all Independent Commissioners of BCA include:

- 1) Not a person who is employed or has the authority and responsibility to plan, lead, control, or oversee BCA activities within the last 6 (six) months, except for re-appointment as an Independent Commissioner of BCA in the following period;
- 2) Has no share in BCA, directly or indirectly;
- 3) Has no affiliation with BCA, other members of the Board of Commissioners, member of the Board of Directors, and/or Controlling Shareholders of BCA;
- 4) Has no financial, management, share ownership, and/or family relationships with members of the Board of Directors, other members of the Board of Commissioners, and/or the ultimate controlling shareholder, or any relationship with the Bank that could affect the person's ability to act independently;
- 5) Has no direct or indirect business relationships related to BCA business activities;
- 6) Fulfilling other requirements of the Independent Commissioners as per applicable regulations;

In addition to the criteria mentioned above, Independent Commissioners must also meet the general requirements for prospective members of the Board of Commissioners.

Independency of Board of Commissioners

All members of the Board of Commissioners of BCA have no financial, management, share ownership, and/or family relationship up to the second degree with other fellow members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders. In addition, all members of the Board of Commissioners of BCA also have no conflict of interest and/or relationship with BCA that may influence his/her ability to act independently and carry out their duties in a professional and objective manner.

The current BCA's Independent Commissioners were appointed in 2021 and the appointment resolution of each BCA's Independent Commissioner will remain effective until 2026. Each Independent Commissioner has prepared Independence Statement Letter, which fulfill the independence aspect as stipulated in Article 25 paragraph (1) of the Financial Services Authority Regulation No. 33/POJK.04/2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Public Companies and it has been submitted to OJK.

b) Duties and Responsibilities of the Board of Directors and Board of Commissioners

The Board of Directors

Duties and Responsibilities of the Board of Directors

The duties and responsibilities of the Board of Directors include the following:

- 1) The Board of Directors is fully responsible for the management of the company for the interests and objectives of the company. The main duties of the Board of Directors are:
 - a. Lead and manage BCA in accordance with the purposes and objectives of the BCA's

Articles of Association.

- b. Control, maintain and manage BCA's assets for its interest.
 - c. Create internal control structure, ensure the implementation of internal audit function in every level of management, and follow up on Internal Audit Division (DAI) findings in accordance with policies or directions given by the board of commissioners.
- 2) Each member of the Board of Directors must carry out their duties in good faith and with full responsibility, while adhering to all applicable laws and regulations.
 - 3) The Board of Directors represents the Company inside and outside the court on all matters and in all events, binds the Company to other parties and other parties to the Company, and carries out all actions, both regarding management and ownership, with the limitation that the Board of Directors must obtain prior written approval from the Board of Commissioners for actions following those listed below.
 - a. Lend money or provide credit or other banking facilities that resemble or result in a loan of money:
 - to related parties, as stipulated in Bank Indonesia Regulations concerning Legal Lending Limits for Commercial Banks;
 - exceeding a certain amount, as determined by the Board of Commissioners from time to time.
 - b. Provide guarantees or debt guarantees (*borgtocht*):
 - to guarantee payment obligations of related parties to third parties as specified in Bank Indonesia, the Financial Services Authority, or other authorized agencies' provisions concerning the Legal Lending Limit for Commercial Banks;
 - to guarantee the obligations of other parties in excess of a certain amount, as determined by the Board of Commissioners from time to time.
 - c. Purchase, or in other ways obtain, immovable property, except in the context of carrying out other activities commonly carried out by the Company as long as it does not conflict with applicable laws and regulations, including, among others, actions in the context of credit restructuring or rescue, including buying collateral, whether the whole or in partial, through auction or in other ways, in the event that the debtor does not fulfill his obligations to the Company, provided that the collateral purchased must be disbursed as soon as possible and in excess of a certain amount determined from time to time by the Board of Commissioners.
 - d. Establish a new company, carry out or release or reduce equity participation, or increase equity participation, is prohibited unless:
 - Additional capital participation derives from the company's stock dividends; or
 - Equity participation in the context of credit bailout;with due observance of the applicable laws and regulations.
 - e. Borrow money that is not included in the activity of collecting funds from the public in the form of demand deposits, time deposits, certificates of deposit, savings, and/or other equivalent forms, the amount of which will be determined by the Board of Commissioners from time to time.
 - f. Transfer or relinquish the company's written-off collection rights, either partially or completely, the amount of which will be determined by the Board of Commissioners from time to time.
 - g. Sell or transfer, release rights to, or pledge/ guarantee, the Company's assets above a certain value determined from time to time by the Board of Commissioners, but whose value is less than or equal to $\frac{1}{2}$ (one-half) of the total net worth of the Company listed in the Company's balance sheet, either in 1 (one) transaction or in several transactions that are independent or are related to one another in 1 (one)

financial year.

- h. Carry out strategic legal actions or transactions that may have a significant impact to the Company's business continuity; the types of legal actions or transactions will be determined from time to time by the Board of Commissioners.
The Board of Commissioners' approval for the actions of the Board of Directors can be given for 1 (one) action or more than 1 (one) action, and that can be reviewed from time to time, subject to applicable laws and regulations.

- 4) To carry out one of the following actions:
 - a. Transfer, relinquish rights, and/or make into debt guarantees totaling more than ½ (one-half) of the Company's total net worth or constituting all of the Company's assets, either in a single transaction or several transactions that are independent or related to one another in a single financial year; except
 - in the context of carrying out BCA's business activities; or
 - implementation of one or more Recovery Options from the Action Plan approved by the GMS, provided that the implementation of one or more Recovery Options must still be approved by the Board of Commissioners; or
 - b. File a request to the competent authority regarding the bankruptcy of the Company or a request for the Company to be granted a suspension of debt payment obligations (surseance van betalen);

The Board of Directors must obtain prior approval from the GMS, which is attended by (the) shareholders of the company and/ or their legal proxies representing at least 3/4 (three-quarters) of the total number of shares of the company with valid voting rights that the company has issued, and the proposal submitted is approved by more than 3/4 (three-quarters) of the total number of votes legally cast at the meeting in question.

- 5) In terms of:
 - a. A member of the Board of Directors is not authorized to represent the Company in matters or transactions in which the member of the Board of Directors concerned has a conflicting interest with the interests of the company, so the company must be represented by another member of the Board of Directors (subject to the provisions of BCA Articles of Association);
 - b. If all members of the Board of Directors have conflicting interest with the company, the Board of Commissioners of the company has the authority to act for, on behalf of, and represent the company in such issues or transactions;
 - c. The clauses in points e.i. and e.ii. above does not prejudice the BCA Articles of Association's provision on "Transactions Containing Conflicts of Interest."
- 6) Without prejudice to the Board of Directors' responsibilities, the Board of Directors has the authority to appoint one or more persons with the authority and conditions specified by the Board of Directors in a special power of attorney for certain actions.
- 7) In connection to the above-mentioned primary duties of the Board of Directors, the Board of Directors is required to:
 - a. Strive and ensure that the Company's business and activities are carried out in accordance with the Company's objectives and business field;
 - b. Prepare and submit to the Board of Commissioners the Company's development plan, work plan, and annual budget, as well as other plans related to the Company's business implementation;
 - c. Organize and maintain the Company's bookkeeping and administration in accordance with company custom;
 - d. Create an accounting system based on internal control principles, particularly the

- separation of management, recording, storage, and supervision functions;
 - e. Provide accountability and all information regarding the condition and operation of BCA in the form of reports on BCA's activities, including financial statements, both in the form of annual reports and in the form of other periodic reports, in the manner and time specified in BCA's Articles of Association, whenever requested by the Board of Commissioners;
 - f. Prepare the organizational structure of the Company, complete with details of the duties;
 - g. Carry out other obligations in accordance with BCA Articles of Association or based on the instructions of the Board of Commissioners or GMS meeting.
- 8) Other Obligations:
- a. Carry out GCG Principles in every business activity of the Company at all levels or phases of the Company's organization;
 - b. Develop an internal control framework to identify, measure, monitor, and control all risks faced by the Company;
 - c. Follow up on audit findings and recommendations from the Company's DAI, an external auditor, monitoring results from BI, Financial Services Authority, and/or monitoring results from other authorities;
 - d. Establish a DAI that is independent of operational work units and effectively implements the internal audit function in accordance with applicable regulations;
 - e. Establish a risk management work unit, as well as a risk management committee and a compliance work unit;
 - f. Submit the annual work plan, which also includes the Company's annual budget, to the Board of Commissioners for approval prior to the start of the next financial year, taking into consideration the laws and regulations applicable in the capital market sector;
 - g. Submit the Company's financial statements for audit to a Public Accountant;
 - h. Disclose strategic company employment policies to employees. Including various employment policies through decrees and circulars that all employees can access, as well as the Collective Labor Agreement (PKB) book, the Company's website, and policies concerning the recruitment system, promotion system, and remuneration system. Such disclosure must be made through medias that are known or easily accessed by employees;
 - i. Provide the Board of Commissioners with accurate, relevant, and timely data and information;
 - j. Appoint members of the Board of Directors' supporting committees based on the decision of the Board of Directors meeting;
 - k. Hold the annual GMS and/or other GMS/ EGMS in accordance with BCA's needs and applicable regulations;
 - l. Deliver accountability for the Company's management for 1 (one) year to the GMS no later than 6 (six) months after the Company's financial year ends;
 - m. Submit reports and disclosure of information to the Financial Services Authority, the Indonesia Stock Exchange, and other authorized agencies in accordance with laws and regulations.

The Board of Commissioners

The duties and responsibilities of the BCA Board of Commissioners include the following:

- 1) Supervise BCA management policies and the general management activities for the interest of BCA in accordance with the goals and objectives of the BCA's Articles of Association.

- 2) Directing, monitoring and evaluating the implementation of BCA's strategic policies and giving advise to the Board of Directors in accordance accordance with regulations.
- 3) Ensure the implementation of the principles of the Corporate Governance are carried out in every business activity at all levels of BCA organization, at least through monitoring of the following:
 - a. Regularly monitor and provide input to the Board of Directors on the implementation of corporate governance;
 - b. Implementation of the duties and responsibilities of the Board of Commissioners and the Board of Directors;
 - c. Completeness and implementation of the duties of the committees and work units that carry out the internal control function;
 - The Board of Commissioners holds regular discussions with the Audit Committee, Risk Monitoring Committee, and Integrated Governance Committee regarding reports on the implementation of duties submitted by each Committee
 - d. Implementation of remuneration policy and periodic evaluation of the remuneration policy;
 - e. Implementation of the compliance, internal auditor and external auditor functions;

Compliance

- The Board of Commissioners supervises the Bank's compliance with applicable rules and regulations.
- The Board of Commissioners reviewed the report on the implementation of the duties and responsibilities of the BCA Integrated Compliance Division.
- The Board of Commissioners receives, monitors, and discusses with the Board of Directors regarding developments in new regulations from Bank Indonesia and OJK.
- The Board of Commissioners regularly discusses the implementation of Anti-Money Laundering, Countering the Financing of Terrorism and Countering the Financing of Proliferation of Weapons of Mass Destruction (AML, PPT and PPPSPM) Programmes and approves the Policies and Provisions for the Implementation of AML, PPT and PPPSPM Programmes.

Internal Auditor

- The Board of Commissioners discussed the external review report on the quality assurance and maturity assessment of the Internal Audit function.
- The Board of Commissioners receives reports regarding the implementation of the main points of internal audit results on a semesterly basis, conducts discussions, and provides input to DAI before submitting it to the OJK.
- The Board of Commissioners receives audit results reports from DAI periodically and discusses several audit results with DAI, the Audit Committee, especially regarding audit results reports that are deemed necessary for the Board of Commissioners to acknowledge and obtain input from.
- The Board of Commissioners evaluates DAI's performance based on recommendations from the Audit Committee.

External Auditor

- Based on recommendations from the Audit Committee, the Board of Commissioners has submitted a proposal to appoint KAP Tanudiredja, Wibisana, Rintis & Rekan - a member firm of the PwC global network (since May 16, 2024, KAP Tanudiredja, Wibisana, Rintis & Rekan, a member firm of the PwC global network has changed its name to KAP Rintis, Jumadi, Rianto & Rekan) to carry

- out an audit assignment for the BCA financial statements for the 2024 financial year and has received approval at the 2024 BCA AGMS.
- Based on the recommendation of the Audit Committee, the Board of Commissioners approved the replacement of the auditor to complete the audit/review of BCA's books and records for the fiscal year ending December 31, 2024.
- f. Implementation of risk management, including internal control systems;
- The Board of Commissioners supervises the management of assets and liabilities (ALCO) carried out by the company's management.
 - The Board of Commissioners periodically evaluates the Risk Management Policy, among others, by approving the determination of the level of risk appetite of the Bank.
 - The Board of Commissioners conducts discussions and provides direction to the Board of Directors and work units regarding risk developments occurring in the banking industry, including cyber risk, which is increasingly developing due to digital transformation.
- g. Provision of funds to related parties and provision of large exposures;
- h. BCA's strategic plan;
- i. Transparency of the financial and nonfinancial conditions;
- j. Approve and periodically review the BCA's vision, mission and core values.
- 4) Supervise the implementation of Integrated Governance.
 - 5) Ensure that the Board of Directors has followed up on audit findings and recommendations from the Internal Audit Division, external auditors, the results of supervision by the Financial Services Authority, Bank Indonesia, and/or other authorities.
 - 6) Provide approval on the merger, consolidation, and/or integration plan, which contains summary information from the independent appraiser's report.
 - 7) Notifying the Financial Services Authority /Bank Indonesia no later than 7 (seven) working days since the finding of violation of laws and regulations in the financial and banking sector and/or circumstances or predicted condition that may endanger the business continuity of BCA
 - 8) The Board of Commissioners is obliged to ensure that the committees that have been formed carry out their duties effectively and evaluate the performance of these committees at the end of each financial year.
 - 9) Hold meetings and prepare minutes of meeting in carrying out the following:
 - a. Regular meetings of the Board of Commissioners at least once every 2 (two) months or 6 (six) times per year.
 - b. Regular meetings of the Board of Commissioners with the Board of Directors at least once every 4 (four) months.
 - 10) Under certain conditions, holding the Annual GMS and other GMS in accordance with respective authorities as stipulated in the applicable laws and regulations, and BCA's Articles of Association.
 - 11) Create and submit reports to the Annual GMS, the Financial Services Authority or other parties.
 - 12) Approved the Bank's Business Plan and Sustainable Financial Action Plan prepared by the Board of Directors.

Duties and Responsibilities of President Commissioner

The President Commissioner carries out the same duties and responsibilities as the Board of Commissioners above, added with other duties and responsibilities, as follows:

- a. Summon for meetings of the Board of Commissioners.
- b. Lead the Board of Commissioners meetings.
- c. Lead the General Meeting of Shareholders. The Board of Commissioners has decided to appoint the President Commissioner as Chairman of the BCA Annual GMS.
- d. Coordinate the implementation of the duties and responsibilities of the Board of Commissioners.
- e. The President Commissioner and the President Director signed signs the documents to be submitted to the Regulator in accordance with the applicable regulations.

In accordance with its duties and responsibilities, throughout 2024 the BCA Board of Commissioners will not be involved in decision-making on BCA's operational activities except in matters mandated in BCA's Articles of Association.

Implementation of the Board of Commissioners' Duties

The Board of Commissioners actively monitored BCA's strategic direction and execution throughout the year, ensuring that the Bank remained aligned with its longterm objectives in an increasingly volatile operating environment. Regular reviews of key initiatives allowed the Board to provide guidance and constructive feedback through in-person and hybrid format meetings and communications on critical areas, including business strategy, risk management, audit, and compliance.

In 2024, the Board of Commissioners held 44 meetings and 6 joint meetings with the Board of Directors. The followings were the area of discussions with the Board of Directors:

Topic	Actions by the Board of Commissioners
Business Strategy & Management	<ul style="list-style-type: none"> • Oversaw business progress and operations, while monitoring the operating environment throughout 2024, covering a variety of macroeconomic parameters, interest rate movement and competition. • Provided inputs on the Bank's strategic direction to the Board of Directors. Touched base on how the business model can remain relevant in a dynamic environment, taking into account changes in transaction behavior, digital evolution, competition in the payment system and shifting customer demographics. The Board of Commissioners noted continuous development in IT and human resources. • Reviewed policies related to lending limits particularly for the industries to which BCA has increased its exposure, and assessed credit disbursement to top obligors to manage concentration risk. • Oversaw asset management and allocations. Supervised corporate budget on both sides of revenues and costs as well as provided feedback through periodic reviews.
Risk Management	<ul style="list-style-type: none"> • Monitored and assessed risk profile, integrated risk management implementation and capital structure. • Held regular discussions with IT division and Risk Management Unit, and monitored cyber risk in the banking sector and BCA. • Held discussions with external parties, and reviewed the duties and responsibilities of BCA's Board of Commissioners from time to time. • Monitored global macroeconomic condition and banking trends, and evaluated BCA's liquidity strength and capital adequacy in the event of significant disruption. • Monitored and reviewed Risk Appetite Statement of the Bank. • Approved the Recovery Plan and the Resolution Plan of the bank.
Audit & Compliance	<ul style="list-style-type: none"> • Monitored and reviewed the scope of audit. • Monitored internal audit assessments on work units and branch performance.

2) Completeness and Implementation of Committee Duties

a) Committees of Board of Commissioners

Structure, Membership, and Independence of Audit Committee Member

The composition of the BCA Audit Committee membership complies with the applicable Financial Services Authority Regulation provisions and the Audit Committee Charter. Throughout 2024, the BCA Audit Committee had 3 (three) members who had been appointed based on Directors' Decree No. 073/SK/DIR/2021 dated April 22, 2021, and Minutes of Board of Commissioners Meeting No. 20/RR/KOM/2021 dated April 22, 2021.

Composition of Audit Committee Members as of December 31, 2024

Name	Position in the Committee	Position at BCA	Term of Office based on the AGMS
Sumantri Slamet	Chairman (concurrently member)	Independent Commissioner	2021 - 2026
Fanny Sagitadewi	Member	Independent Party	2021 - 2026
Rallyati A. Wibowo	Member	Independent Party	2021 - 2026

All members of the Audit Committee are independent parties who have no financial, management, share ownership, and/or family relationships with members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholders or business relationships with BCA that may affect their ability to act independently.

Structure, Membership, and Independence of Risk Oversight Committee Member (ROC)

The composition of BCA ROC membership has complied with the applicable provisions of the OJK Regulation and the ROC Charter. Throughout 2024, ROC has 4 (four) members who have been appointed by the Board of Directors through the Board of Directors' Decree No. 0212/SK/DIR/2023 dated December 18, 2023, and based on the decision in the Minutes of the Board of Commissioners Meeting No. 050/RR/KOM/2023 dated December 6, 2023.

Composition of the ROC Members as of December 31, 2024

Name	Position in the Committee	Position at BCA	Term of Office based on the AGMS
Cyrrillus Harinowo	Chairman (concurrently member)	Independent Commissioner	2021 - 2026
Endang Swasthika Wibowo	Member	Independent Party	2021 - 2026
Joanes Justira Gunawan	Member	Independent Party	2024 - 2026
Reinhard Harianja	Member	Independent Party	2024 - 2026

All ROC members are independent parties who do not have financial, management, share ownership, and/or familial relationships with members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholders, as well as business relationships with BCA, that may affect their ability to act independently. All ROC members carry out their duties independently without any intervention from any party.

Structure, Membership, and Independence of Remuneration and Nomination Committee (RNC)

The composition of the BCA RNC membership complies with the applicable provisions

according to Financial Services Authority Regulation No. 34/ POJK.04/2014 concerning the Nomination and Remuneration Committee of Issuers or Public Companies and as stipulated in the RNC Work Guidelines and Rules. In 2024, BCA RNC has 3 (three) members who have been appointed based on Directors Decree No. 064B/SK/ DIR/2021 dated April 7, 2021, and the decision in the Minutes of Meeting of Board of Commissioners Meeting No. 03/RR/KOM/2021 dated January 20, 2021.

Composition of RNC Members as of December 31, 2024

Name	Position in the Committee *)	Position at BCA	Term of Office based on the AGMS
Raden Pardede	Chairman	Independent Commissioner	2021 - 2026
D.E. Setijoso	Member	President Commissioner	2021 - 2026
Rudi Lim	Member	Head of Human Capital Management Division ^{*)}	2021 - 2026

*) The Head of the Human Capital Management Division is an Executive Officer who has knowledge of the remuneration system and/or nomination and succession plan

All members of RNC have fulfilled the independence aspect, namely not having financial, management, share ownership, and/or familial relationships with members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholders, as well as business relationships with BCA that could affect their ability to act independently. All RNC members carry out their duties independently without any intervention from any party.

Structure, Membership, and Independence of Integrated Governance Committee (IGC)

The composition of the BCA IGC membership complied with the applicable provisions of the Financial Services Authority Regulation and IGC Charter. As of December 31, 2024, the IGC has 10 (ten) members who have been appointed by the Board of Directors from the Main Entity through Board of Directors' Decree No. 0093/SK/DIR/2024 concerning the Appointment of the Chairman and Members of the Integrated Governance Committee based on the decision in the Minutes of Meeting of the Board of Commissioners from the Main Entity No. 027/RR/KOM/2024 dated June 19, 2024. As of 1 September 2024, the IGC has 9 (nine) members who have been appointed by the Board of Directors from the Main Entity through Board of Directors' Decree No. 0169/SK/DIR/2024 dated October 14, 2024 based on the decision in the Minutes of Meeting of the Board of Commissioners from the Main Entity No. 039/RR/KOM/2024 dated September 18, 2024

Composition of the IGC Members

Name	Position in the Committee ¹⁾	Position in the Financial Conglomeration	Term of Office
Member from the Main Entity			
Cyrellus Harinowo	Chairman (concurrently member)	Main Entity's Independent Commissioner	May 6, 2021 – 2026 AGMS
Prabowo	Member	Main Entity's Independent Party ^{**)}	May 6, 2021 – 2026 AGMS
Member from the Subsidiary^{***)}			
Sulistiyowati	Member	Independent Commissioner PT BCA Finance	May 6, 2021 – 2026 AGMS
Gustiono Kustianto	Member	Independent Commissioner PT Asuransi Umum BCA	May 6, 2021 – 2026 AGMS
Pudjianto	Member	Independent Commissioner PT Asuransi Umum BCA	May 6, 2021 – 2026 AGMS
Mathilda Simon	Member	Independent Commissioner PT BCA Multi Finance	September 14, 2023 – September 1, 2024
Ratna Yanti	Member	Independent President Commissioner PT Bank BCA Syariah	March 10, 2023 – 2026 AGMS
Sutedjo Prihatono ¹⁾	Member	Member of the Sharia Supervisory Board of PT Bank BCA Syariah	May 6, 2021 – 2026 AGMS
Hendra Iskandar Lubis	Member	Independent Commissioner PT BCA Sekuritas	May 6, 2021 – 2026 AGMS

Name	Position in the Committee ¹⁾	Position in the Financial Conglomeration	Term of Office
Janto Havianto	Member	Independent Director BCA Finance Limited, Hongkong	June 20, 2024 – 2026 AGMS
Ina Suwandi	Member	Independent Commissioner PT Bank Digital BCA	September 14, 2023 – 2026 AGMS

Note:

¹⁾ Membership of Independent Commissioners, Independent Parties, and Members of the Sharia Supervisory Board in the IGC of the Financial Conglomerate is not counted as concurrent positions.

^{**)} Members of the IGC who are independent parties are appointed by the Main Entity's Board of Commissioners.

^{***)} Appointment of IGC members who are Independent Commissioners and/or Members of the Sharia Supervisory Board who represent FSI in the BCA's Financial Conglomerate is based on the appointment of each FSI

Members of the IGC must adhere to the independence and requirements of the Board of Directors and/or the Board of Commissioners from the Main Entity as well as the independence and requirements of the Board of Directors and/ or the Board of Commissioners of Subsidiaries in the Financial Conglomerate.

All members of the IGC are independent parties who do not have financial, management, share ownership, and/or familial relationships with members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholders, or business relationships with BCA and/or Subsidiaries that may affect their ability to act independently. All IGC members also carry out their duties independently without any intervention from any party.

b) Duties and Responsibilities of Committees under the Board of Commissioners
Duties and Responsibilities of Audit Committee

The Audit Committee has the following duties and responsibilities:

- 1) Financial Report and Information
 - a. Review the financial information that will be issued by BCA to the public and/or authorities, and other reports related to BCA financial information.
 - b. Review and report to the Board of Commissioners any complaints about the BCA accounting process and financial reporting.
- 2) Internal Audit
 - a. Provide recommendations to the Board of Commissioners regarding the preparation of the audit plan, scope and budget of the Internal Audit Division (DAI).
 - b. Monitor and review the effectiveness of BCA's internal audit implementation.
 - c. Evaluate DAI's performance in terms of the adequacy and effectiveness of the internal audit function at BCA and ensure that DAI upholds integrity in carrying out its duties; as well as providing recommendations to the Board of Commissioners regarding the overall annual remuneration for the DAI as well as performance related rewards.
 - d. Ensure DAI communicates with the Board of Directors, the Board of Commissioners, external auditor, and the Financial Services Authority, Bank Indonesia as well as other related parties.
 - e. Ensure DAI works independently.
- 3) External Audit
 - a. Provide recommendations based on the evaluation results to the Board of Commissioners regarding the appointment, reappointment, and dismissal or replacement of the Public Accounting Firm (PAF) and/or Public Accountant (PA) that will audit the financial statements based on:
 - The independence of PA, PAF, and PAF insiders.
 - The scope of audit.
 - Audit fees.
 - Expertise and experience of the PA, PAF, and the audit team of PAF.
 - Methodologies, techniques and tools used by PAF.
 - Benefits of new perspectives obtained through the replacement of PA, PAF, and the audit team of PAF.
 - Potential risk of using audit services by the same PAF consecutively for a long period of time.
 - Results of the evaluation of the provision of audit services on annual historical financial information by PA and PAF in the previous period, if any.

- b. Evaluate the implementation of audit services on annual historical financial information by PA and/or PAF. Evaluation of the implementation of the provision of audit services on annual historical financial information by PA and/or PAF is carried out at least through:
 - Conformity of audit implementation by PA and/or PAF with applicable Audit Standards.
 - Adequacy of field work time.
 - Assessment of the scope of services provided and the adequacy of the sampling test.
 - Recommendations for improvement provided by PA and/or PAF.
 - Conformity of Financial Statements with applicable Financial Accounting Standards (SAK).
 - Providing an independent opinion in the event of a difference of opinion between management and PAF for the services it provides.
- 4) Process/Internal Control Systems
- a. Ensure the Board of Directors takes the necessary and immediate actions on the findings by DAI, PA, and the results of supervision conducted by the Financial Services Authority and BI.
 - b. Provide recommendations to the Board of Commissioners to appoint independent quality assurance from external parties with the aim of conducting a review of DAI.
- 5) Governance and Compliance
- a. Monitor the implementation of effective and sustainable Good Corporate Governance (GCG).
 - b. Review and give advice to the Board of Commissioners on potential conflicts of interest that may occur at BCA.
 - c. Review BCA's compliance with regulations of the banking industry, the Capital Market and other applicable laws and regulations, as well as other provisions related to BCA's business activities.
 - d. Maintain the confidentiality of BCA's documents, data, and informations.
 - e. Attending BCA's Annual GMS.
 - f. Carry out other duties relevant to the function of the Audit Committee at the request of the Board of Commissioners.

Duties and Responsibilities of ROC

ROC has the following duties and responsibilities:

- a. Shall conduct the following duties and responsibilities, at least:
 - 1) Evaluating the consistency between the risk management policy and the implementation of BCA's policy.
 - 2) Monitoring and evaluating the implementation of duties of the Risk Management Work Unit, the Risk Management Committee, and the Information Technology Steering Committee
- b. The results of the evaluation referred to in paragraph a.1) and the results of the monitoring and evaluation referred to in paragraph a.2) shall be used to make recommendations to the Board of Commissioners to ensure effectiveness of carrying its duties and responsibilities in the field of risk management and ensure that the risk management policy is properly implemented.
- c. Support the Board of Commissioners in carrying out its duties and responsibilities in the

- implementation of risk management, including, among other things, the following risks:
- 1) Credit Risk;
 - 2) Market Risk;
 - 3) Liquidity Risk;
 - 4) Operational Risk;
 - 5) Legal Risk;
 - 6) Reputation Risk;
 - 7) Strategic Risk; and
 - 8) Compliance Risk.
- d. ROC also monitors the implementation of risk of the following risks:
- 1) Country Risk;
 - 2) Transfer Risk;
 - 3) IT Risk;
 - 4) Cyber Risk;
 - 5) Outsourcing Risk;
 - 6) Climate; and
 - 7) ESG Risk.
- and other risks in banking field.
- e. ROC supervises the implementation of risk evaluation and testing (stress testing).
- f. Assisting the Board of Commissioners in carrying out its duties of maintaining and monitoring the risk-based Bank's Soundness Level, especially risk profile parameters.
- g. Assisting the Board of Commissioners in monitoring and evaluating the implementation of the Recovery Plan.
- h. Develop working guidelines and rules for the ROC (the Charter) and conducting reviews as needed.
- i. Carry out other duties and responsibilities given by the Board of Commissioners from time to time.

Duties and Responsibilities of RNC

In carrying out its functions, the RNC has the following duties and responsibilities:

- 1) Related to the remuneration function:
 - a. Evaluate and ensure that BCA's remuneration policies comply with applicable regulations and are based on performance, risk, fairness with peer groups, long-term goals and strategies, the fulfillment of reserves as stipulated in laws and regulations, and the potential income of BCA in the future
 - b. Recommend to the Board of Commissioners regarding:
 - i. Remuneration policy for the Board of Commissioners and the Board of Directors for submission to the GMS.
 - ii. The structure and amount of remuneration for members of the Board of Directors and/or members of the Board of Commissioners.
 - iii. Remuneration policy for Executive Officers and employees as a whole for submission to the Board of Directors by the Board of Commissioners.
 - c. Assisting the Board of Commissioners in evaluating performance according to the remuneration received by each member of the Board of Directors and/or members of the Board of Commissioners.
 - d. Conduct periodic evaluations of the implementation of the remuneration policy.
- 2) Related to the nomination function:
 - a. Develop and recommend to the Board of Commissioners systems and procedures for selecting and/or replacing members of the Board of Commissioners and Directors for

- submission to the GMS.
- b. Recommend to the Board of Commissioners regarding:
 - i. Policies and criteria required in the nomination process.
 - ii. Candidates for members of the Board of Commissioners and/or candidates for members of the Board of Directors for submission to the GMS.
 - iii. Composition of members of the Board of Directors and/or members of the Board of Commissioners position.
 - iv. Capacity building program for members of the Board of Directors and/or members of the Board of Commissioners.
 - v. Performance evaluation policy for members of the Board of Directors and/or members of the Board of Commissioners.
- c. Recommend independent parties as candidates for members of the Audit Committee and Risk Oversight Committee to the Board of Commissioners.
- d. Assist the Board of Commissioners in evaluating the performance of members of the Board of Directors and/or members of the Board of Commissioners based on benchmarks that have been prepared as evaluation material.
- 3) Carry out other tasks given by the Board of Commissioners related to remuneration and nomination in accordance with applicable regulations.
- 4) Report the results of studies and recommendations related to the duties of the RNC to the Board of Commissioners, if necessary.

Duties and Responsibilities of IGC

The IGC has duties and responsibilities, including:

- 1) Evaluate the implementation of Integrated Governance, at least through assessing the adequacy of internal control and the implementation of integrated compliance function and integrated risk management.
- 2) Provide recommendations to the Main Entity's Board of Commissioners for improvements to the Integrated Governance Guidelines
- 3) Provide recommendations to the Main Entity's Board of Commissioners after conducting at least:
 - i. Evaluation of integrated governance implementation; and
 - ii. Monitor the implementation of the Integrated Governance Guidelines.
- 4) Make a report on the realization of the annual work program, which is submitted in the Main Entity's Annual Report.

c) Committee Meeting Frequency

Audit Committee Meeting Frequency

Procedures for the Audit Committee Meeting includes the following:

- a. Meetings can be held by:
 - 1) physically at BCA's place of domicile;
 - 2) electronically through teleconferencing, videoconferencing, or other electronic media of similar nature that allow all the meeting participants to see and/or hear one another directly and participate in the Meeting.
- b. The Mechanism for Adopting Meeting Resolutions:
 - 1) The Audit Committee's meetings are held in accordance with the needs of BCA, at least once a month.
 - 2) The Audit Committee's meetings can only be held if attended by a majority (more than 50%) of the number of members including an Independent Commissioner and Independent Party.
 - 3) The resolutions of the Audit Committee's Meeting shall be adopted by deliberation for a consensus.

- 4) If such consensus cannot be reached, the resolutions shall be adopted by a majority vote.
 - 5) The Chairperson of the Committee and each member thereof shall have 1 (one) vote.
 - 6) All decisions of the Audit Committee Meeting are binding for all members of the Audit Committee.
- c. Minutes of Meeting:
- 1) The results of the Audit Committee Meeting must be stated in the Minutes of Meeting, which are signed by all members of the Audit Committee who are present and properly documented.
 - 2) Dissenting opinions that occur at the Committee Meeting must be clearly stated in the Minutes of Meeting along with the reasons for the dissent. The results of the Committee Meetings are recommendations that can be optimally used by the Board of Commissioners.
- d. The Audit Committee's attendance at meetings is at least 75% of the total number of Committee meetings held.

In 2024, the Audit Committee has held 31 (thirty one) meetings.

Data on the attendance of the Committee members at the Audit Committee meetings throughout 2024 is as follows:

Name	Number of Meetings	Attendance	Percentage
Sumantri Slamet	31	31	100 %
Fanny Sagitadewi	31	31	100 %
Rallyati A. Wibowo	31	31	100 %

ROC Meeting Frequency

a. Organizing the Meeting:

- 1) The ROC's Meeting shall be held according to the needs of BCA, at least 1 (one) time in 1 (one) month.
- 2) ROC meetings are held if attended by the majority of KPR members (more than 50%) including 1 (one) Independent Commissioner.
- 3) The attendance rate of ROC members in meetings is at least 75% (seventyfive percent) of the number of ROC meetings held.
- 4) Meetings can be held either in person or through electronic media, or a combination of the two.
- 5) Meetings that are attended nonphysically are conducted via teleconference media, video conferences, or other electronic media facilities that must allow all meeting participants to see and/or hear each other directly and participate in the meeting.
- 6) Invitations and meeting materials must be distributed to members of the committee no later than 5 (five) working days prior to the meeting date.

b. Meeting Decision Making:

- 1) The decision of the ROC Meeting must first be made based on deliberation to reach a consensus.
- 2) In the event that deliberation for consensus does not occur, the decision is made based on the majority vote with the principle of 1 (one) person 1 (one) vote.
- 3) All ROC Meeting decisions are binding for all ROC members.

c. Minutes of Meeting:

- 1) The results of the ROC meeting must be included in the minutes of meeting, which must be signed by all ROC members present and documented in accordance with the law.
- 2) Dissenting opinions that occur at the ROC Meeting must be clearly stated in the Minutes of Meeting along with the reasons for the dissent.
- 3) The results of the ROC Meeting are recommendations that can be utilized optimally by the Board of Commissioners and the Board of Directors.

Throughout 2024, ROC has held 17 (seventeen) meetings.

Data on the attendance of Committee members in the implementation of ROC meetings throughout 2024 are as follows:

Name	Number of Meetings	Attendance	Percentage
Cyrillus Harinowo	17	17	100 %
Endang Swasthika Wibowo	17	17	100 %
Joanes Justira Gunawan	17	17	100 %
Reinhard Harianja	17	17	100 %

RNC Meeting Frequency

RNC meetings can only be held if they are attended by at least 51% (fifty one percent) of the total committee members, including Independent Commissioners and Executive Officers in charge of the human resources function. Throughout 2024, RNC has held 5 (five) meetings. The results of the RNC meeting were presented as follows:

- a. The results of the RNC meeting must be outlined in the minutes of the meeting, which include the date of the meeting, the attendance of members of the Remuneration and Nomination Committee, the meeting agenda, and meeting materials.
- b. Dissenting opinions that occur at a committee meeting must be clearly stated in the minutes of the meeting along with the reasons for the dissent.

The data for the Committee members' attendance at the RNC meeting as of December 31, 2024, is as follows:

Name	Number of Meetings	Attendance	Percentage
Raden Pardede	5	5	100 %
D.E. Setijoso	5	5	100 %
Rudi Lim	5	5	100 %

Out of the 5 (five) RNC meetings, there were 3 (three) meeting with a discussion related to remuneration, 1 (one) meetings with a discussion related to performance evaluation, and 1 (one) meeting with a discussion related to other topics.

IGC Meeting Frequency

The provisions for holding the IGC meeting are as follows:

- 1) The IGC holds meetings as needed, at least once every semester or 2 (two) times a year.
- 2) The IGC meeting can only be held if it is attended by at least 51% (fifty one percent) of

- the total committee members, including 1 (one) Independent Commissioner.
- 3) The IGC Meeting can be held:
 - a. In person at the BCA domicile or at another place determined by the Chairman of the IGC; or
 - b. Electronically through teleconferences, video conferences, or similar electronic media facilities that allow all participants in the IGC meeting to see and hear each other directly and participate in the IGC meeting.
 - 4) The decision-making process of the IGC Meeting is as follows:
 - a. The decision of the IGC Meeting is made based on deliberation to reach a consensus.
 - b. In the event that deliberation for consensus does not occur, the decision is made based on the majority vote with the principle of 1 (one) person, 1 (one) vote.
 - c. All decisions of the IGC Meeting are binding for all members of the IGC.
 - 5) The minutes of the IGC Meeting are as follows:
 - a. The results of the IGC meeting must be recorded in the minutes of the meeting, which are signed by all members of the IGC present and properly documented in accordance with laws and regulations.
 - b. Dissenting opinion that occurs in a committee meeting must be clearly stated in the minutes of the meeting along with the reasons for the dissent.
 - c. The results of the IGC meetings constitute recommendations that can be optimally utilized by the Main Entity's Board of Commissioners and Board of Directors and Financial Services Institutions members of the Financial Conglomerate.
 - d. Throughout 2024, the IGC has held 6 (six) meetings.

Data on the attendance of Committee members in the IGC Meeting throughout 2024 is as follows:

Data on the attendance of Committee members in the IGC Meeting throughout 2024 is as follows:

Name	Number of Meetings	Attendance	Percentage
Cyrellus Harinowo	6	6	100%
Prabowo	6	6	100%
Sulistiyowati	6	6	100%
Gustiono Kustianto	6	6	100%
Pudjianto	6	5	83.33%
Mathilda Simon *)	4	4	100%
Ratna Yanti	6	6	100%
Sutedjo Prihatono	6	6	100%
Hendra Iskandar Lubis	6	5	83.33%
Janto Havianto **)	3	3	100%
Ina Suwandi	6	6	100%

Note:

*) In office since September 14, 2023 until August 31, 2024, as the merger of PT BCA Multi Finance took effect on September 1, 2024.

**) Serving since June 20, 2024, until the closing of the 2026 AGMS

d) Realization of the Work Program and Implementation of Activities of Committees in 2024

Realization of the Work Program and Implementation of Audit Committee Activities

The realization of the BCA Audit Committee Work Program as stated in the Audit Committee guidelines or Charter throughout 2024 is as follows:

- 1) KAP Rintis, Jumadi, Rianto & Rekan (previously known as KAP Tanudiredja, Wibisana, Rintis & Rekan) - a member firm of the PwC global network was evaluated and recommended to the Board of Commissioners for reappointment to conduct an audit of BCA's Financial Statements for the financial year 2024.
- 2) Held a meeting with PAF Rintis, Jumadi, Rianto & Rekan (a member firm of the PwC global network) to discuss the plan and scope of the audit of BCA's Financial Statements for the 2024 financial year.
- 3) Held a meeting with Klynveld Peat Marwick Goerdeler Public Accountant Firm to discuss plans for a performance review and maturity assessment of DAI for the period of July 1, 2020 to June 30, 2023.
- 4) Held a meeting with the Accounting Group to review the BCA Financial Statement, which will be published every quarter.
- 5) Held 5 (five) meetings with DAI for:
 - i. Evaluate annual planning.
 - ii. Evaluating the implementation of internal audits every semester.
 - iii. Conduct discussions on audit results that are considered significant.
- 6) Reviewed internal audit results report and monitor their follow-up.
- 7) Reviewed BCA's compliance with the provisions, regulations, and laws that apply in the banking sector through reviewing compliance reports on prudential provisions that are reported every semester.
- 8) Reviewed credit portfolio reports published every semester.
- 9) Monitored the implementation of risk management through quarterly reports on BCA's Risk Profile and monthly reports on the Operation Risk Management Information System (ORMIS).
- 10) Conducted review on:
 - i. The results of the examination by OJK and its follow-up.
 - ii. Management Letter from PAF Rintis, Jumadi, Rianto & Rekan - a member firm of the PwC global network and its follow-up.
- 11) Reported the results of regular reviews and evaluations on the aspects of governance, risk management, compliance, and control to the Board of Commissioners every quarter.
- 12) Attended a virtual AGMS, Analyst Meeting and BCA National Working Meeting in 2024.
- 13) In accordance with OJK Regulation No. 1/POJK.03/2019 on the Implementation of the Internal Audit Function by Commercial Banks, performed an assessment on the DAI, whose results are submitted to the Board of Commissioners to be forwarded to the RNC.
- 14) Conducted studies and held a meeting with PAF Rintis, Jumadi, Rianto & Rekan - a member firm of the PwC global network, to discuss the final results of the audit of BCA's Financial Statements for the 2024 financial year along with the Management Letter.

Realization of Work Program and Implementation of Activities of ROC

Throughout 2024, ROC has carried out the following:

- 1) Reviewed and adjusted the Risk Management Committee Charter.
- 2) Monitored the implementation of the duties of the Risk Management Committee, the

- Risk Management Division and the Information Technology Steering Committee (ITSC).
- 3) Monitored and analyzed BCA's risk profile and specifically studied credit risk, operational risk, market risk, liquidity risk, as well as reputation risk.
 - 4) Performed analysis and evaluation on the results of stress tests for credit risk, market risk, and liquidity risk.
 - 5) Ensuring that the implementation of Good Corporate Governance is carried out properly by attending the 2024 BCA National Work Meeting physically and attending Analyst Meeting virtually.
 - 6) Monitored the realization of the implementation of Risk Management, particularly the control and limit of credit, liquidity and market risk, as well as operational risk, every month.
 - 7) Monitored the developments, impacts, and risk mitigation in general related to the COVID-19 pandemic and the global economic downturn.
 - 8) Analyze changes in strategic risk profiles and parameters due to changes in business and economic activity patterns due to the impact of the pandemic and its response.
 - 9) Conduct credit risk and strategic risk analysis evaluations on credit portfolios.
 - 10) Analyze and evaluate operational risks and strategic risks related to payment transactions.
 - 11) Evaluate the implementation of third-party risk management.
 - 12) Evaluate the Risk Appetite Statement.
 - 13) Monitor and explore new regulations related to risk management and IT risk management governance.

Realization of the Work Program and Implementation of RNC Activities

The realization of the BCA RNC work program for 2024 is as follows:

- 1) Prepare recommendations regarding proposals for granting *tantiem* to the Board of Commissioners and the Board of Directors for BCA's performance in 2023.
- 2) Prepare recommendations regarding the proposed Remuneration Package for Members of the Board of Commissioners and Directors for the term of office from 2024 to 2026.
- 3) Evaluate the results of the self-assessment of the Board of Directors and Board of Commissioners.
- 4) Develop recommendations regarding whether or not it is necessary to postpone or withdraw deferred variable remuneration payments from Material Risk Takers

Realization of the Work Program and Implementation of IGC Activities

Throughout 2024, the IGC has carried out IGC work activities/programs, namely evaluating the adequacy of implementation of Integrated Governance at the BCA Financial Conglomerate. These evaluation activities are carried out, namely through the presentation and discussion on the Integrated Internal Audit Results Report and the Integrated Compliance Report.

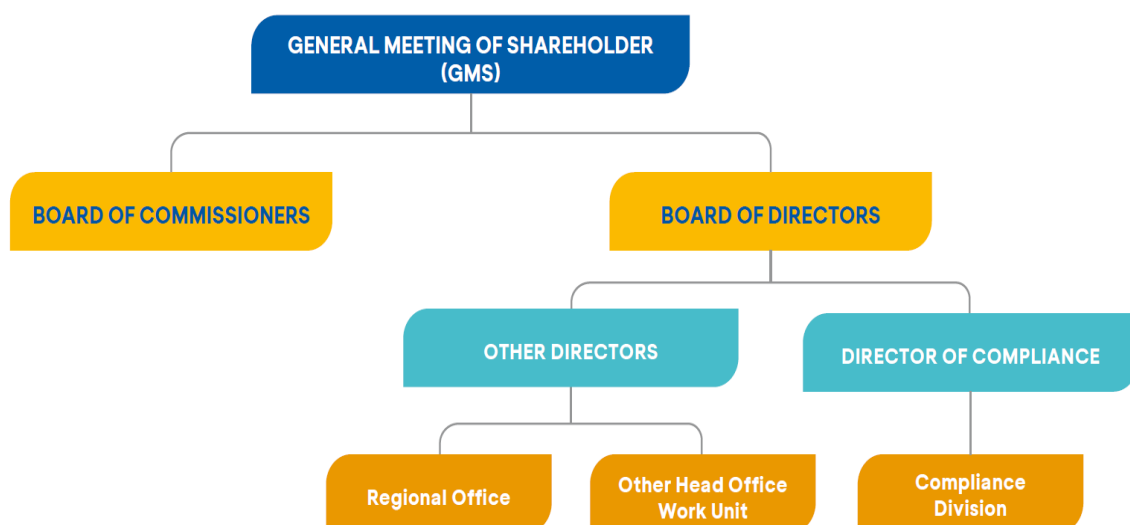
2) COMPLIANCE FUNCTION

Implementation of Compliance Function, External Internal Audit and External Audit Implementation of Compliance Function

In order to carry out its compliance functions as regulated under OJK Regulation No. 46/POJK.03/2017 on the Implementation of Commercial Bank Compliance Functions, BCA formed a Compliance Division (DCP) as an autonomous work unit free of influence from other work units. Furthermore, BCA, as the Main Entity in the BCA Financial Conglomeration, has broadened the DCP organizational structure to include an Integrated Compliance Function to implement Integrated Governance for the Financial Conglomeration..

Organizational Structure of DCP

The DCP organizational structure is stipulated by the Board of Directors' Decree No. 247/SK/DIR/2022, dated December 28, 2022. The DCP is led by the Head of the Compliance Division, whose appointment was reported to the OJK. The DCP reports directly to the Director of Compliance. The designation and appointment of the Compliance Director have met the requirements required and are being carried out in accordance with OJK regulations.



DCP Responsibilities

The DCP's responsibilities are as follows:

- Monitor BCA's level of compliance with OJK, BI, and other regulators' requirements. This includes ensuring that BCA's policies, regulations, systems, and procedures, as well as business activities, comply with regulatory requirements.
- Coordinating the Implementation of Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (AML, CTF, and PFPWMD) Programs, including conducting risk assessments for implementing the AML, CTF, and PFPWMD programs in accordance with the regulator's provisions.
- Carry out the Gratification control function within BCA.

Integrated Compliance Function

BCA, as the Main Entity in the BCA Financial Conglomerate, has also added an integrated compliance function to the DCP organizational structure in order to implement Integrated Governance in accordance with Financial Services Authority Regulation No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates. The integrated compliance function in the DCP's main task is to monitor and evaluate the implementation of the compliance function and the level of compliance at each Financial Services Institution (FSI) in the BCA Financial Conglomerate, including the implementation of the AML, CTF, and PFPWMD Programs.

To ensure the implementation of BCA's compliance function, the Board of Directors and Board of Commissioners have also exercised active supervision through, among other things, policy and procedure approval, periodic reporting, requests for explanations, and meetings.

Implementation of Compliance Function Work in 2024

DCP carried out the following functions in 2024:

1. Promote the development of a compliance culture.
 - Communicate and inform the Board of Directors, Board of Commissioners, and work units on new regulations issued by regulators.
 - Provide information on OJK, BI, PPATK and other laws and regulations on the BCA portal site, which work units can access.
 - Involve DCP's human resources in a variety of trainings, regulatory socialization seminars from regulators, and risk management certification, as well as actively participating in the Banking Compliance Director Communication Forum working group.
 - Provide suggestions/responses to questions from work units or branches in order to carry out consultative functions related to the implementation of applicable regulations.

2. Ensure that BCA's policies, provisions, systems, and procedures, as well as its business operations, are in accordance with the provisions, including:
 - Identify potential sources of compliance risk.
 - Conduct a gap analysis, assess the impact of new provisions on BCA operations, and propose for adjustment to internal manuals, policies, and procedures.
 - Create a Compliance Matrix Diary as a monitoring tool to verify compliance with regulatory reporting requirements.
 - Conduct reviews and provide opinions to ensure compliance with applicable regulatory provisions regarding:
 - New product and activity plans;
 - Draft internal regulations to be published;
 - Compliance with corporate credit releases; and
 - Documents in the context of capital investment plans.
 - In collaboration with Branch Internal Supervisors and Regional Office Internal Supervisors, conduct compliance tests on the implementation of provisions at Branch Offices and Regional Offices.
 - Monitor the level of compliance with applicable regulatory provisions relating to prudential banking principles, specifically:
 - Minimum Capital Adequacy Requirement;
 - Minimum Statutory Reserve;
 - Macroprudential Liquidity Buffer;
 - Net Open Position;
 - Maximum Legal Lending Limit;
 - Non-Performing Loans (NPL);
 - Macroprudential Intermediation Ratio;
 - Liquidity Coverage Ratio (LCR);
 - Net Stable Funding Ratio (NSFR);
 - Macroprudential Inclusive Financing Ratio (RPIM).
 - Monitoring the imposition of sanctions/fines from regulators.
 - Conduct compliance risk assessments and prepare Compliance Risk Profile Reports quarterly to manage compliance risks.
 - Prepare quarterly compliance monitoring reports for the Board of Directors and the Board of Commissioners.
 - Coordinate with work units within the framework of risk-based Bank Health Level assessments
 - Implement BCA Governance and Integrated Governance in collaboration with the Environment Sustainability Governance Group.
 - Utilize information technology, also known as Regulatory Technology (RegTech), to

increase efficiency and effectiveness in the process of managing regulatory regulations, as well as to maintain an up-to-date regulatory regulations database

3. Ensure BCA's compliance with regulatory commitments, including:
 - Monitor BCA's commitment to OJK, BI, and other regulators in collaboration with DAI.
 - Monitor and follow up on information/ data requests from the Financial Services Authority, BI, and other regulators in the context of bank supervision.
4. Perform gratification control functions such as:
 - Create policies and procedures for gratification control.
 - Coordinate socialization activities to all BCA Personnel and stakeholders regarding Gratification control provisions.
 - Receive and administer BCA Personnel Gratification reports.
 - Report to the Board of Directors on the implementation of Gratification control on a regular basis, at least once a year.
5. Monitor and evaluate the compliance function both in an integrated manner and at each Subsidiary Company within the BCA Financial Conglomeration, including:
 - Create and submit Integrated Compliance Reports to the Board of Directors and the Board of Commissioners.
 - Coordinate with work units in the context of risk-based assessment of the Consolidated Bank's Health Level.
 - Conduct reviews and provide opinions to ensure that BCA's Collaboration Synergy plans with Subsidiary
 - Companies are following regulatory requirements.
 - Coordinate with the Subsidiary Company's Compliance PIC in the context of preparing an Integrated
 - Compliance Risk Profile each semester.
 - Communicate with Subsidiary Companies in the context of implementing the compliance function

2024 Compliance Indicators

The following compliance indicators for 2024 represent BCA's commitment to and level of compliance with applicable laws and regulations:

Table of Compliance Indicators for 2024

No.	Compliance Indicator	Applicable Provisions	BCA Achievement	Description
1	Minimum Capital Adequacy Requirement (KPPM)	Min. 14% up to <15%	29.36%	Complied with the applicable provisions
2	Non-Performing Loan (NPL) Net	Max. 5%	0.59%	
3	Maximum of Legal Lending Limit (BMPK)	Max. 10% of total capital	4.04%	
4	Minimum Statutory Reserve (GWM) Rupiah	Min. 5%	5.76%	
5	Macroprudential Liquidity Buffer (PLM)	Min. 5%	30.56%	
6	Minimum Statutory Reserve (GWM) Foreign Currency	Min. 4%	4.22%	
7	Net Open Position (PDN)	Max. 20%	0.27%	
8	Liquidity Coverage Ratio (LCR)	Min. 100%	323.01%	
9	Macroprudential Intermediation Ratio (RIM)	84% - 94%	80.48% ¹⁾	In accordance with RIM's description below
10	RIM Current Account	Min. according to the provisions	0.72%	In accordance with RIM's description below
11	Net Stable Funding Ratio (NSFR)	Min. 100%	155.85%	Complied with the applicable provisions
12	Macroprudential Inclusive Financing Ratio (RPIM)	Min. 21.5%	21.51%	

Note:

¹⁾ BCA's Macroprudential Intermediation Ratio (RIM) from October to December 2024 is lower than the lower limit of RIM target set by BI at 84% in PADG No. 22/11/PADG/2020 dated April 29, 2020 on Amendments to PADG No. 21/22/PADG/2019 on Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units, therefore BCA is required to establish a RIM Reserve in Rupiah equal to the calculation between the lower limit of RIM and the difference between BCA's RIM and Target RIM against Rupiah deposits.

Based on PADG No. 23/7/PADG/2021 dated April 26, 2021 concerning the Third Amendment to PADG No. 21/22/PADG/2019 concerning Intermediation Ratios and Macroprudential Liquidity Buffers for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units, there is a Lower Disincentive Parameter related to RIM compliance, which is that since January 2022, the Lower Disincentive Parameter for Banks with RIM conditions < 84 %, NPL < 5% and Minimum Capital Requirement > 19% are set at 0.15.

Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (AML, CTF, and PFPWMD) Programs

BCA is committed to implementing Anti-Money Laundering, Counter-Terrorism Financing and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (AML, CTF, and PFPWMD) programs in accordance with Financial Services Authority Regulation No. 8 of 2023 concerning Implementation of Anti-Money Laundering Programs, Prevention of Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction in the Financial Services Sector. During 2023, the following activities will be carried out in connection with the implementation of the AML, CTF, and PFPWMD programs:

- 1) Provide periodic reports to the Board of Directors and Board of Commissioners on the implementation of the AML, CTF, and PFPWMD.
- 2) Monitoring suspicious financial transactions with a web-based application called STIM (Suspicious Transaction Identification Model), as well as developing and improving the application system with the latest technology and updating parameters to detect suspicious transactions.
- 3) Coordinate the implementation of updating customer data by setting targets and monitoring their achievement.
- 4) Reviewing new product and activity plans to ensure compliance with the AML, CTF, and PFPWMD provisions.
- 5) Screening customer and transaction data against watchlists published by competent authorities, such as the List of Suspected Terrorists and Terrorist Organizations, List of Financing for the Proliferation of Weapons of Mass Destruction, The Office of Foreign Assets Control (OFAC) List, United Nations (UN) List, and European Union (EU) List,

when opening an account and when the watchlist list changes.

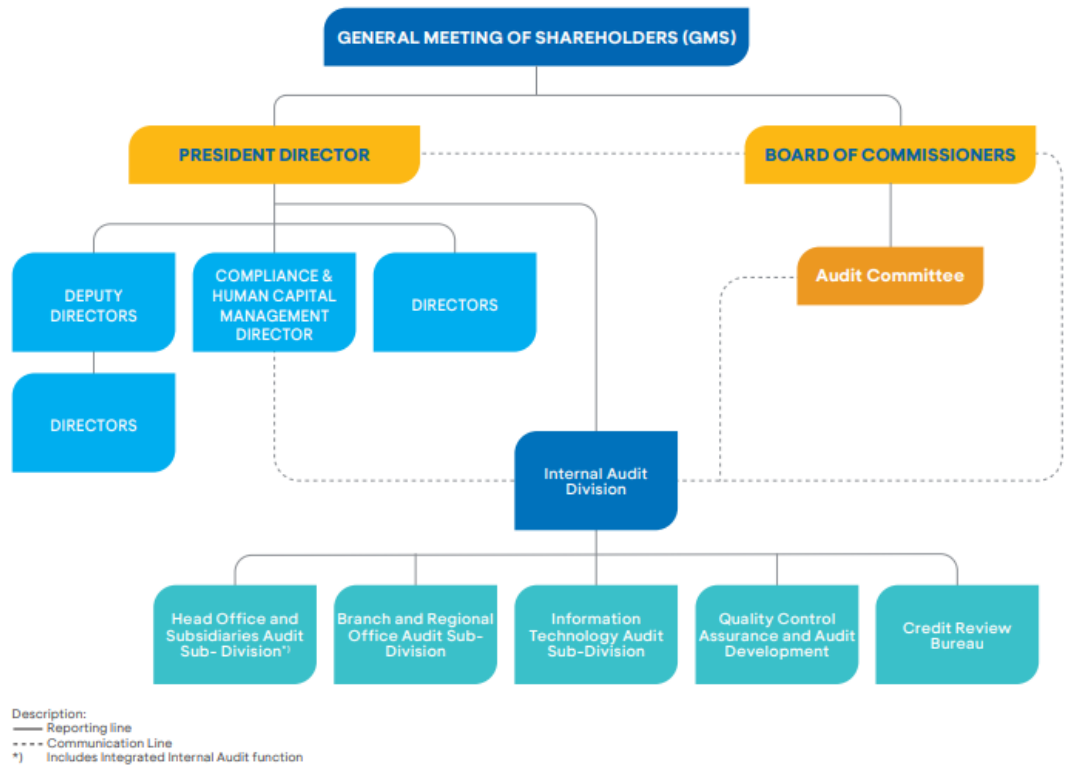
- 6) Identify and assess risks associated with the implementation of AML, CTF, and PFPWMD using a risk-based approach, considering customer, country or geographic area, product and service, and distribution network factors.
- 7) In collaboration with Branch Internal Supervisors, conduct compliance tests on the implementation of AML, CTF, and PFPWMD at Branch Offices.
- 8) Reporting suspicious financial transactions, cash financial transactions, and financial transactions transferring funds to and from abroad, as well as submitting data to the Financial Transaction Reporting and Analysis Center (PPATK) via the Integrated Service User Information System (SIPESAT) and the Information System for Suspected Terrorism Financing (SIPENDAR).
- 9) Ongoingly increase understanding of AML, CTF, and PFPWMD by holding training and socialization through classroom training, online training, e-learning, and virtual/hybrid events, as well as internal forums such as Regional Coordination Meetings and Coordination Meetings of Heads of Branch Operations and Service Operations Forum.
- 10) Developing training materials for AML, CTF, and PFPWMD applications.
- 11) Review and provide feedback on new product and activity plans, as well as draft internal regulations to be issued, to ensure compliance with applicable AML, CTF, and PFPWMD provisions.
- 12) Participate in activities organized by the regulator, including:
 - Implementation of PPATK's Financial Integrity Rating (FIR).
 - Implementation of Focus Group Discussions related to the National Consultation
 - Hold a meeting on the Collecting and Integrating Initial Data PPP Project regarding Investment Fraud.
 - Implementation of Focus Group Discussions related to the Onsite Visit of the Second Round of AEOI

3) INTERNAL AUDIT DIVISION

Internal Audit Division (DAI) performs its duties and responsibilities independently and objectively, led by the Head of the Division, whose responsible to the President Director. The head of DAI is appointed and dismissed by the President Director after obtaining the approval of the Board of Commissioners, considering the Audit Committee's recommendations. DAI was formed to strengthen the company's ability to create, protect, and maintain BCA value by providing assurance, advice, insight, and foresight that are independent, risk-based, as well as objective, also acting as a strategic partner of management in building BCA into a leading bank in Indonesia. The audit carried out by DAI aims to assess the adequacy and effectiveness of BCA's governance, risk management, and internal control processes. The implementation of DAI functions is guided by OJK Regulation No. 1/POJK.03/2019 concerning the Implementation of the Internal Audit Function in Commercial Banks and the International Professional Practices Framework established by The Institute of Internal Auditors as a professional standard for internal audit.

DAI, in its role as third line, continuously coordinates and communicates with work units/other line functions in order to collaborate and contribute to each other in creating and maintaining value that is aligned with stakeholder interests.

Structure and Position of the Internal Audit Division



DAI’s organizational structure is reviewed on a regular basis to ensure that it is in line with the company’s business needs and developments. The Board of Directors’ Decree No. 063/SK/DIR/2017 concerning Revision of the Organizational Structure of the Internal Audit Division (DAI) standardized the most recent update to DAI’s organizational structure. DAI is responsible directly to the President Director and has direct communication with the Board of Commissioners and the Audit Committee.

Internal Audit Charter

BCA Internal Audit Charter is a framework that provides guidance in carrying out Audit tasks and consists of mission, organizational position, independence and objectivity, authority, and scope of work. The Internal Audit Charter has been reviewed in 2022 in which it was approved by the President Director and the Board of Commissioners by considering the recommendations of the Audit Committee. The Internal Audit Charter refers to Financial Services Authority Regulation No. 56/POJK.04/2015 regarding the Establishment and Guidelines for the Preparation of the Internal Audit Charter and is in accordance with Financial Services Authority Regulation No. 1/POJK.03/2019 dated January 28, 2019 concerning the Implementation of the Internal Audit Function in Commercial Banks and applicable professional standards.

Independence & Objectivity

DAI’s position is independent of operational work units or risk-taking units, as DAI does not have the authority and responsibility to carry out operational activities at BCA and its Subsidiaries.

Every internal auditor must declare that he has no family/ financial/other interests in the audit object and/or the party being audited (auditee) that could affect the objectivity of the audit.

During 2024, DAI carried out audit activities independently where there are no conflicts of interest, restrictions on scope and access to data, personnel, or property, or resource constraints that could affect the independence and objectivity of audit implementation.

Auditor Code of Ethics

In carrying out their duties and responsibilities, internal auditors are required to behave professionally and comply with established ethical standards. The standard auditor code of ethics refers to the International Professional Practices Framework (IPPF) - The Institute of Internal Auditors (IIA), which consists of:

1) Demonstrate Integrity

Internal auditors demonstrate integrity in their work and conduct.

2) Maintain Objectivity

Internal auditors maintain an impartial and unbiased attitude when performing internal audit services and making decisions.

3) Demonstrate Competency

Internal auditors apply knowledge, skills, and abilities to fulfill their roles and responsibilities well.

4) Exercise Due Professional Care

Internal auditors apply professional care in planning and carrying out internal audit services.

5) Maintain Confidentiality

Internal auditors use and protect information appropriately.

In order to maintain stakeholders' trust, every internal auditor is required to make a statement of compliance with the auditor's ethics and professionalism.

Internal Audit Duties and Responsibilities

The following are the tasks and responsibilities of Internal Audit in performing its functions:

- 1) Assist the President Director and Board of Commissioners in decision-making and supervision by operationally explaining planning, implementation, and monitoring of audit results.
- 2) Assess the adequacy and effectiveness of the company's governance, risk management, and internal control processes.
- 3) Resource and budget usage effectiveness evaluation.
- 4) Provide the objective improvement recommendations for the activity being audited at all levels of management.
- 5) Act as an advisor for internal company parties who need it, especially regarding the scope of their duties.
- 6) Coordinate with work units that carry out other internal control functions.
- 7) Perform integrated internal audit function.

The Integrated Internal Audit function is carried out by DAI in accordance to OJK Regulation No. 18/POJK.03/2014 regarding the Implementation of Integrated Governance for Financial Conglomerates. The implementation of an integrated internal audit includes but not limited to:

- 1) Monitoring the implementation of the Subsidiary's internal audit function and provide recommendations that added value.
- 2) Conducting audit of Subsidiaries.
- 3) Supporting the development of the Subsidiaries' internal audit function.

Every semester, the integrated internal audit report is submitted to the Board of Commissioners, Audit Committee, and the Board of Directors, and DAI attends every meeting of the Integrated Governance Committee.

DAI conducts periodic skills assessments to identify and map the competencies required by auditors, and the results are used as a foundation for continuously developing auditor competencies (including meeting the needs of specialist auditors). Continuous competency development is carried out through both internal and external training. Internal auditors are also given the opportunity to attend seminars to learn about business developments, information technology, and audit techniques. DAI also includes internal auditors from various audit-related professional associations, such as the Institute of Internal Auditors (IIA) - Indonesia, the Association of Fraud Examiners (ACFE), the Information Systems Audit and Control Association (ISACA), the Bank Internal Auditors Association (IAIB), and the Indonesian Accountants Association (IAI).

Audit Implementation and Quality Control Standards

DAI's audit function implementation standards are guided by the Internal Audit Professional Standards, including:

- Financial Services Authority Regulation No. 1/POJK.03/2019 concerning the Implementation of Internal Audit Function in Commercial Banks.
- Financial Services Authority Regulation No. 11/POJK.03/2022 concerning the Implementation of Information Technology in Commercial Banks.
- International Professional Practices Framework established by The Institute of Internal Auditors.
- Information Technology Audit Framework (ITAF) established by the Information System Audit and Control Association (ISACA) as a reference for best practices.

Internal audit applies a risk-based audit methodology in its activities, which includes planning, implementation, and reporting, as well as monitoring follow-up improvements. In line with technological advances, DAI strives to continuously optimize the use of data, tools, and technology to increase the effectiveness and efficiency of audit implementation as well as increasing added value and early warning systems for potential errors/fraud, including the implementation of Continuous Auditing, Robotic Process Automation, Predictive Analytic Tools, and Machine Learning.

DAI has used an integrated Audit Management System to support the implementation of audit activities, from audit planning, audit process implementation and monitoring follow-up improvements, which can be observed via the dashboard.

DAI has a quality control and audit development unit that is in charge of ensuring conformity with established standards and code of ethic. External reviews as part of independent quality control have been carried out every 3 (three) years, most recently in 2023 for the inspection period July 1, 2020 - June 30, 2023, with the conclusion of "generally conform" and reported by BCA to OJK in August 2023.

Implementation of Internal Audit Division Duties in 2024

In 2024, DAI carried out audits of Branch Offices, Regional Offices, Head Office Divisions/Work Units, and Subsidiary Companies as well as business processes, in accordance with the Annual Audit Plan, which is determined based on the results of risk assessments that are carried out periodically by considering various current risk factors. The focus of audit implementation in 2024 includes:

- 1) The quality of credit and restructuring.
- 2) Reliability of main applications that support bank operations, such as systems for treasury, trade finance and bookkeeping activities.
- 3) System Development Life Cycle (SDLC).
- 4) Procurement processes related to Information Technology.
- 5) Online account opening process.
- 6) Implementation of Anti-Money Laundering, Prevention of Terrorism Financing, and Funding for the Proliferation of Weapons of Mass Destruction (AML, PTF, and PPSPM).

- 7) Treasury.
- 8) Increase audit coverage through continuous auditing and data analytics and develop predictive analytic tools/machine learning as Early Warning Systems (EWS) to detect potential errors/fraud.
- 9) Improve the integrated internal audit function through assurance, monitoring, and consultation/support processes provided to Subsidiary Companies.
- 10) Continue to develop auditor professionalism on an ongoing basis.

During 2024, DAI has held meetings with the President Director 8 (eight) times, meetings with the Audit Committee 6 (six) times, and meetings with the Board of Commissioners 2 (two) times.

Internal Audit Division Advisory Activities in 2024

During 2024, DAI carried out advisory activities related to governance processes, risk management, and internal control, which include various aspects such as conducting independent reviews, post-implementation reviews, facilitating discussions regarding risks and controls, etc. In advisory activities, audit provides advice without providing assurance or taking management responsibility to maintain objectivity.

Focus of Audit Activities in 2025

The focus of the audit examination in 2025 is in accordance with the results of the risk assessment, especially related to credit, operational, market risk, and liquidity risk, including:

- 1) Treasury activities.
- 2) Complaint handling process and EDC operations.
- 3) Reliability of applications that support bank operations, such as Mobile Banking & Credit Card applications.
- 4) Information Security and Cyber Resilience and Personal Data Protection.
- 5) Conducting credit quality reviews and credit rescue.
- 6) Implementation of Risk Management.
- 7) Increased audit coverage through continuous auditing and data analytics.
- 8) Improving the integrated internal audit function.

Implementation Of The External Audit Function

In order to fulfill the implementation of the external audit function in accordance with OJK Regulation No. 9 of 2023, concerning the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities and OJK Circular Letter No. 18/SEOJK.03/2023, concerning Procedures for Using the Services of Public Accountants and Public Accounting Firms in Financial Services Activities, therefore:

- 1) BCA uses the services of a Public Accountant (PA) and/ or a Public Accountant Firm (PAF) to carry out an annual audit of historical financial information based on a cooperation agreement with the PAF, which states the scope of the audit.
- 2) The appointed PA and/or PAF is a PA and/or PAF that is actively registered with the OJK and has competence in accordance with the complexity of the BCA's business.
- 3) The use of audit services from the same AP is limited to a maximum audit period of 7 (seven) cumulative years starting from the 2017 financial year. BCA can reuse annual historical financial information audit services from the same PA after a cooling off period of 5 (five) consecutive financial reporting.
- 4) The appointment of PA and/or PAF to provide audit services on annual historical financial information must be determined by the GMS, who will consider the Board of

Commissioners' recommendations. The proposal must consider the Audit Committee's suggestions. If the GMS is unable to decide on the appointment, it may delegate the intended authority to the Board of Commissioners, together with an explanation of the reasons for the delegation of authority and the criteria or constraints for PA/PAF who may be appointed.

- 5) In preparing recommendations, the Audit Committee may consider:
 - a. Independence of PA, PAF, and PAF Insiders;
 - b. Audit scope;
 - c. Audit service fees;
 - d. Expertise and experience of PA, PAF, and the Audit Team from the PAF;
 - e. The audit methodology, techniques, and tools used by the PAF;
 - f. The benefits of fresh perspective that will be obtained through the replacement of the PA, PAF, and the Audit Team from the PAF;
 - g. The potential risk of using audit services by the same PAF consecutively for a long period of time; and/or
 - h. Results of the evaluation of the implementation of the provision of audit services on annual historical financial information by PA and PAF in the previous period.
- 6) BCA reports on the appointment of a PA and/or PAF for an audit of annual historical financial information by using the form contained in the attachment to the Financial Services Authority Circular Letter No. 18/SEOJK.13/2023, concerning Procedures for Using PA and PAF Services in Financial Services Activities, by attaching
 - a. Appointment documents for PA and/or PAF including the Summary of Minutes of the General Meeting of Shareholders or Minutes of the General Meeting of Shareholders, as well as the Work Agreement between BCA and PAF.
 - b. The Audit Committee's recommendations and considerations to be weighed when recommending the appointment of a PA and/or PAF.

Effectiveness of External Audit Implementation

The Audit Committee evaluates the implementation of the provision of audit services on annual historical financial information by the PA and/or PAF which at the minimum includes:

- 1) Conformity of audit implementation by PA and/or PAF with applicable audit standards;
- 2) Adequacy of field work time;
- 3) Assessment of the scope of services provided and the adequacy of sampling test; and
- 4) Recommendations for improvements provided by the PA and/or PAF.

The report on the evaluation results of the Audit Committee was submitted by the Board of Directors of BCA using the form contained in the attachment to OJK Circular Letter No.18/SEOJK.03/2023, concerning Procedures for Using the Services of Public Accountants and Public Accounting Firms in Financial Services Activities and signed by the Audit Committee on February 7, 2024.

Relationship Between Banks, Public Accountants, and the Financial Services Authority

To ensure that the audit process goes smoothly BCA keeps external auditors informed on audit implementation plans, audit progress, and other significant issues during audits. OJK receives the audit results report in compliance with relevant rules and regulations.

2024 Audit Fees

PwC Indonesia was appointed as the auditor of BCA and certain of its Subsidiaries to audit the financial statements for the year ending December 31, 2024, with details of fees charged to each Subsidiary as shown in the table below:

No.	Company	Services Performed in 2024	Service fee ¹⁾
1	PT Bank Central Asia Tbk	Audit	Rp8,884,026,000.00
2	PT BCA Finance	Audit	Rp1,500,000,000.00
3	PT Asuransi Umum BCA	Audit	Rp730,000,000.00
4	PT BCA Sekuritas	Audit	Rp500,000,000.00
		AUP Reconciliation of Securities Ledger ²⁾	Rp50,000,000.00
		NAAE MKBD ²⁾	Rp65,000,000.00
5	PT Bank Digital BCA	Comfort Memo ECL	Rp130,000,000.00

Notes:

¹⁾ Does not include VAT.

²⁾ Included in audit fees

Based on the disclosure provisions of IESBA (International Ethics Standards Board for Accountants)

Information regarding the PAF and PA that performed audit services for BCA since 2017 is as follows:

Tahun	PAF	PA
2024	KAP Rintis, Jumadi, Rianto & Rekan (member firm of PwC global network, formerly KAP Tanudiredja, Wibisana, Rintis & Rekan)	M. Jusuf Wibisana
2023		Lucy Luciana Suhenda
2022		Jimmy Pangestu
2021		Jimmy Pangestu
2020		Jimmy Pangestu
2019		Lucy Luciana Suhenda
2018		Lucy Luciana Suhenda
2017		Lucy Luciana Suhenda

4. RISK MANAGEMENT SYSTEM

BCA has an effective risk management system and internal control system that are tailored to BCA's objectives, business policies, size, and complexity of business activities. The Board of Commissioners and the Board of Directors of BCA is in charge of implementing risk management and internal control systems at BCA and its subsidiaries integratedly.

BCA follows regulatory requirements and refers to international best practices when implementing risk management.

Risk Management System Overview

BCA has implemented an integrated Risk Management System Framework to manage risk. This framework is used as a tool to establish strategy, organization, policies and procedures, as well as risk management infrastructure, in order to ensure that all risks encountered by BCA can be identified, measured, monitored, controlled, and reported correctly.

The framework for BCA's and integrated risk management implementation describes a risk management framework and process that have interrelationships and reciprocal relationships, both between the Board of Commissioners, the Board of Directors, Supporting Committees under the Board of Commissioners and the Board of Directors, and between Divisions as well as Subsidiaries.

The implementation of BCA risk management includes:

- 1) Active supervision by the Board of Commissioners and the Board of Directors.

In carrying out active supervision, the Board of Commissioners and Board of Directors is accountable for the effectiveness of risk management implementation, ensuring that risk management implementation is adequate in accordance with BCA's characteristics, complexity, and risk profile, and properly understanding the types and levels of risk attached to BCA's business activities.

- a) Oversight by the Board of Commissioners is assisted by the Risk Oversight Committee (ROC), whose function is as follows:
 - i. Provide independent professional recommendations and opinions regarding the conformity of policies and the implementation of risk management policies to the Board of Commissioners.
 - ii. Monitor and evaluate the implementation of the duties of the Risk Management Committee (RMC) and Risk Management Division (MRK).
- b) Oversight by the Board of Directors is assisted by:
 - i. RMC, which has the main task of providing recommendations to the Board of Directors, which at least includes the following:
 - Formulate policies, strategies, and guidelines for implementing risk management.
 - Refine the implementation of risk management based on the results of evaluating the implementation of effective risk management process and system.
 - Determine matters related to business decisions that deviate from normal procedures (irregularities).
 - ii. Integrated Risk Management Committee (IRMC) has the main task of providing recommendations to the Board of Directors which at least include:
 - Formulate integrated risk management policies.
 - Improve or refine the integrated risk management policies based on the results of the implementation evaluation.
 - iii. Other committees tasked with handling specific risks, among others, the Credit Policy Committee (CPC), Credit Committee (CC), Information Technology Steering Committee (ITSC), and the Asset Liability Committee (ALCO).
- c) Risk Management Division (MRK) has been established to ensure that BCA and its Subsidiaries carry out integrated risk mitigation properly through identification, measurement, monitoring, control, and reporting in accordance with the risk management framework and are able to deal with emergency situations that threaten BCA's business continuity.

MRK's authorities and responsibilities include:

- i. Carry out authority and responsibility in accordance with OJK Regulation No. 18/POJK.03/2016, concerning the Implementation of Risk Management for Commercial Banks, including:
 - Provide input to the Board of Directors and/or Committees under the coordination of the Board of Directors and/or Board of Commissioners in the context of preparing and improving policies, strategies, and risk management frameworks.
 - Develop procedures and tools for identifying, measuring, monitoring, and controlling risks, including cyber security risks.
 - Identify, measure, monitor, control and report all risks arising from the bank's business activities in accordance with the risk appetite.
 - Review and provide recommendations on strategy, organization, business plans/new products, policies, provisions, guidelines, methodology, and infrastructure in accordance with risk management implementation guidelines.
 - Review the accuracy of the risk assessment methodology, the adequacy of risk mitigation, the implementation of the risk management information system, and the accuracy of policies, procedures, and limit determination.

- Design and review company policies relating to the continuity of business activities, crisis management, employee safety and health in normal and emergency/crisis conditions, as well as ensuring the company's ability to deal with emergency situations and crisis conditions that threaten the continuity of business activities.
 - Develop strategies, manage, and monitor cyber resilience testing to determine the impact of implementing cybersecurity risk management policies and strategies on the bank's overall risk profile.
- ii. Carry out integrated risk management authority and responsibility in accordance with OJK Regulation concerning the Implementation of Integrated Risk Management as one of the functions of MRK and coordinating with work units in each Subsidiary Company that carry out Risk Management functions.
- 2) **Adequacy of Risk Management Policies and Procedures, as well as Risk Limit Determination**
- a) BCA has performed risk management and ensure the availability of policies and determination of risk limits, which are supported by procedures, reports, and information systems that provide management with accurate and timely information and analysis, including determining steps to deal with significant changes in market conditions.
- b) BCA has ensured that operational and business aspects, as well as the level of risk that may occur in a work unit, have been considered in the process of developing work systems and procedures.
- c) In accordance with regulatory provisions, BCA has a Basic Risk Management Policy (KDMR) and a Basic Integrated Risk Management Policy (KDMRT) of the BCA Financial Conglomerate (BCA FC), which include, among other things:
- i. Risk management implementation framework for each type of risk.
 - ii. Risk management implementation report.
 - iii. Implementation of consolidated risk management.
 - iv. Implementation of integrated risk management.
- d) Regularly review and update policies, procedures and risk management framework in accordance with BCA's needs and regulatory requirements.
- 3) **Adequacy of risk identification, measurement, monitoring, and control processes, as well as risk management information systems**
- a) BCA has adequate risk identification, measurement, monitoring, and control procedures in place, as well as a risk management information system. Monitoring is carried out by both the implementing unit and MRK, and the results are reported to management on a regular basis in order to mitigate risks and take appropriate actions.
- b) BCA has developed a management information system that is tailored to the characteristics, activities, and complexity of business operations. The risk management information system is reviewed on a regular basis in accordance with BCA's needs and regulatory requirements.
- c) Every quarter, BCA prepares and submits a Risk Profile Report, and every semester, an Integrated Risk Profile Report.
- 4) **Comprehensive Internal Control System.**

Types of Risk and Its Management

Referring to OJK Regulation No. 18/POJK.03/2016, concerning the Implementation of Risk

Management for Commercial Banks, BCA manages 8 (eight) types of risk, and in accordance with OJK Regulation No. 17/POJK.03/2014, concerning the Implementation of Integrated Risk Management for Financial Conglomerates, BCA as the Main Entity of the BCA Financial Conglomeration (BCA FC) must manage an additional 2 (two) types of risk, namely:

1. Credit Risk

- a. Credit organization is improved continuously by referring to the four eyes principle in which credit decisions are taken based on considerations from two sides, namely the business development side and the credit risk analysis side.
- b. BCA reviews internal credit provisions to ensure that they are in line with BCA developments, regulatory requirements, prudential banking principles, and international best practices.
- c. Develop and refine:
 - o Credit risk management procedures and systems via the “Loan Origination System” to improve the effectiveness and efficiency of the credit granting process.
 - o Debtor risk profile measurement system.
 - o Credit database.
- d. In order to maintain credit quality in line with risk appetite, BCA has:
 - o Regularly monitored credit quality, both per credit category (Corporate, Commercial, Small and Medium Enterprise (SME), Consumer, and Credit Card), per industrial sector, and overall credit portfolio, including restructured credit and problem loans resolution.
 - o Conduct close monitoring and authority control over branches with SME/mortgage/credit card loans with a TPF30+ ratio (>30 days in arrears) and high NPLs so that branches can focus on improving their credit quality.
 - o Determine credit limits and monitor these limits.
- e. Conduct regular credit portfolio stress testing analysis and monitoring of the results so that BCA can develop appropriate strategies to mitigate these risks as part of the “contingency plan” implementation.
- f. Routinely monitored and controlled credit risk in Subsidiary Companies, and ensure that Subsidiary companies have good and effective Credit Risk Management Policies.
- g. Develop:
 - Credit monitoring tools such as the Early Warning System (EWS) as a forwardlooking loan monitoring system.
 - Credit Scoring System and Credit Quality Risk Model using Advanced Analytics approach to support sustainable credit business growth.
- h. Following the regulator's determination of the end of the credit restructuring relaxation policy on March 31, 2024, debtors who were previously granted COVID-19 credit restructuring and still require time for business recovery after the end of the relaxation policy can be granted normal restructuring if they meet the restructuring criteria based on BCA and regulator provisions.

2. Market Risk

- a. In order to manage foreign exchange rate risk, BCA has set NOP limits per branch and combined, and measurements have been performed using the Value at Risk (VaR) method with a Historical Simulation approach for internal reporting.
- b. BCA manages trading book portfolios exposed to interest rate risk by establishing and monitoring the use of Nominal Limits, Value at Risk Limits (VAR), and Stop Loss Limits, as well as performing valuations based on actual transaction prices (close out prices) or quoted market prices from an independent source.

- c. BCA measures banking book interest rate risk using 2 (two) perspectives, namely:
 - Economic Value Perspective, using the Economic Value of Equity (EVE) method, which is a method that measures the impact of interest rate changes on the economic value of bank equity.
 - Earnings Basis Perspective, using the Accrual Method, which is a method for calculating the impact of changes in interest rates on a bank's Net Interest Income (NII).
- d. ALCO regularly monitors:
 - Market developments, movements in reference interest rates and interest rates offered by competing banks to determine deposit and credit interest rates.
 - Fixed interest loans and banking book securities.
- e. Conducts stress testing on a regular basis with various scenarios, deepening the factors and parameters in stress testing..
- f. Calculate the Minimum Capital Adequacy Requirement (MCAR) Reporting using regulatory-compliant method governed by the OJK Circular Letter No. 23/SEOJK.03/2022 concerning Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks.

3. Liquidity Risk

- a. BCA places a high priority on maintaining adequate liquidity in order to meet its obligations to customers and other parties, including providing credit, repaying customer deposits, and meeting operational liquidity needs. The overall liquidity needs management function is carried out by ALCO, and the Treasury Division operationally.
- b. Liquidity risk measurement and control is carried out through:
 - Fund progress report.
 - Monitoring liquidity reserves (secondary reserves) and liquidity ratios such as the Loan to Deposit Ratio (LDR), Liquidity Coverage Ratio (LCR), and Net Stable Funding Ratio (NSFR).
 - Cash flow projections.
 - Periodic stress testing to assess the impact of extreme conditions on BCA's liquidity. In addition, BCA has a contingency funding plan in place to deal with these extreme conditions.
- c. Maintains Rupiah and Foreign Currency liquidity (Statutory Minimum Reserve/SMR) in accordance with regulatory provisions on a daily and average basis for a specific reporting period, which consists of:
 - SMR and MIR Giro (Macroprudential Intermediation Ratio) in the form of Rupiah current account with Bank Indonesia.
 - Foreign currency SMR in the form of foreign currency current account with Bank Indonesia.
 - MLB (Macroprudential Liquidity Buffer) in the form of SBI, SDBI, SRBI, and SBN.

4. Operational Risk

- a. The goal of operational risk management is to minimize the potential negative impacts of insufficient and/or non-functioning internal processes, human error, system failure, and/or external events. Operational risk management is constantly being develop in order to adapt to the constantly changing business environment and minimize the risks that the bank faces.

- b. Referring to the regulatory provisions, BCA uses the Standardized Approach method to allocate capital for reserve to losses from operational risks. Good and high-quality operational risk event data is required for calculating the capital charge for operational risk in accordance with the bank's operational loss exposure. As a result, BCA has established internal provisions governing the input of loss data in order to meet the qualitative requirements outlined in OJK Circular Letter No. 6/SEOJK.03/2020, concerning Calculation of Risk-Weighted Assets for Operational Risk Using a Standard Approach for Commercial Banks.
- c. In order to assist in the management of operational risk, BCA has supporting infrastructure in the form of the Operational Risk Management Information System (ORMIS) application, which includes:
 - o Risk Control Self Assessment (RCSA), which is used as a tool to instill risk management culture and increase risk awareness across all work units.
 - o Loss Event Database (LED), which is used to record operational losses that are used in calculating capital charge, continuous monitoring of events that can cause operational losses for BCA, and analyzing the risks faced by the bank, allowing for necessary corrective/preventive actions to be taken to minimize/mitigate the potential risk of future operational losses.
 - o Key risk indicator (KRI), which is a tool used to provide an early warning sign of the possibility of an increase in operational risk in a work unit. This KRI has also been further developed into Predictive Risk Management, which can help work units monitor risk exposure.
- d. Carry out a risk assessment process in developing new products or activities that will be carried out. In addition, materiality measurements or assessments are carried out for increases in risk exposure from product development or activities that BCA has previously owned.
- e. In order to maintain cyber security, BCA has Cyber Security Risk Management, whose job it is to analyze, determine, and develop procedures and tools for cyber security risk management. Furthermore, BCA has an Information Technology Security Group that is responsible for implementing the principles of securing technology systems and supporting facilities, as well as developing preventive measures to protect and secure the company's information assets and information technology infrastructure from various technological crimes (cyber crime).
- f. In order to maintain data privacy, BCA has a Data Protection Officer (DPO)/Personal Data Protection Officer whose job is to ensure that BCA complies with Law no. 27 of 2022 concerning Personal Data Protection. The DPO carries out this task by ensuring all activities comply with BCA's internal policies, increasing awareness of the importance of data security and privacy, monitoring BCA as a controller and processor of personal data, acting as BCA's contact person for issues related to personal data processing, and conducting regular reviews to ensure BCA always complies with the PDP Law.
- g. In order to anticipate risks posed by nature or human disasters that could disrupt the bank's business operations, particularly customer service, BCA has established a Business Continuity Management and Business Continuity Plan (BCP) and regularly conducts BCP awareness socialization and testing of the BCP, which includes cyber incident simulation.

5. Legal Risk

- 1) Carrying out risk measurements and assessments based on potential losses from cases occurring at BCA and Subsidiaries that are currently in process or have been resolved in court to BCA capital and consolidated capital.
- 2) In order to mitigate legal risks, the Legal Group has done the following, among other things:
 - o Develop a Legal Risk Management Policy.
 - o Holding a legal communication forum to improve the competency of legal staff.

- Conduct socialization to related branch officials, Regional Offices, and Head Office work units on the impact of newly implemented regulations on BCA banking activities and various modus operandi of banking crimes, as well as guidelines for dealing with them legally.
 - Develop a credit security strategy plan in conjunction with bad credit problems (in collaboration with other work units, including the Credit Recovery Group).
 - Register Intellectual Property Rights (IPR) on BCA products with the authorized agency and secure ownership of BCA assets as well as monitor and take legal action for BCA IPR violations.
 - Register Intellectual Property Rights (IPR) on BCA products with the authorized agency and secure ownership of BCA assets, including rights to BCA land and buildings, as well as monitor and take legal action for BCA IPR violations.
- 3) In order to identify, measure, monitor, and control legal risks, BCA has established a Legal Group (GHK) at the Head Office, and Legal Work Units in all Regional Offices, as well as carrying out, among other things:
- Preparation of standard agreements to support BCA business activities and review of agreements with other parties, including amendments (addendum).
 - Review draft policies or procedures, especially those related to operational and credit law.
 - Legal review of new products/activities.
 - Inventorize legal case data and assess legal risk profiles based on historical quantitative data on cases that have occurred.
 - Legal defense and monitoring of case developments in civil and criminal cases involving BCA and Subsidiary Companies that are currently in the litigation process.
 - Monitoring and analysis of cases related to:
 - Business activities of BCA and Subsidiary Companies, which are currently in the process of litigation, with the position of BCA and Subsidiary Companies and/or officials of BCA and Subsidiary Companies as plaintiff/defendant/reporter/respondent/ suspect/defendant;
 - Credit and/or financing problems and human resources at BCA and Subsidiaries that are currently in the process of litigation.

6. Reputational Risk

- a. Reputation risk is assessed using parameters such as the number of complaints and negative publications, as well as complaint resolution achievement.
- b. Infrastructure development, which includes the implementation of appropriate software and hardware (including Halo BCA Telephone Service and 24-hour WhatsApp/WA Chat, BCA CRM Contact Center, Web Chat via www.bca.co.id, and the Halo BCA application that can be used by mobile phones users with IOS and Android platforms), as well as the development of a better procedures and work management to facilitate monitoring and management information systems that can support organizational quickness and quality.
- c. Monitor and collaborate with related work units in handling negative news.
- d. The implementation of reputation risk management based on regulatory provisions.
- e. Regular evaluation of the parameters for assessing and implementing reputation risk management.

7. Strategic Risk

- a. Strategic risk measurement and assessment is carried out by analyzing the suitability of strategies to business environmental conditions and high-risk strategies, as well as measuring BCA's business position in the banking industry and the achievement of the Bank's Business Plan.
- b. The Board of Commissioners and the Board of Directors understand the strategic risks that can affect BCA's financial condition. The Board of Directors plays an active role in monitoring internal conditions and developments in external factors that influence BCA's business strategy directly or indirectly
- c. Preparation of business plans/strategies also considers various dynamics of global and domestic economic and business conditions as well as business conditions by paying attention to risk appetite and risk tolerance. The strategic plan is outlined in a long-term plan in the form of a Corporate Plan and a medium-short plan in the form of a Bank Business Plan (RBB) as a 3 (three) year business strategy blueprint.
- d. Have procedures to monitor and measure company performance through financial control, which aims to monitor the achievement of business plans and performance periodically.

8. Compliance Risk

- a. In accordance with OJK Regulation No. 46/ POJK.03/2017, concerning the Implementation of Compliance Functions for Commercial Banks, BCA has appointed a member of the Board of Directors as Director in Charge of Compliance, who is responsible for ensuring compliance and minimizing compliance risk by developing compliance risk management policies and procedures and monitoring their implementation. The Compliance Division (DCP), which is independent of operational work units, assists the Director in charge of the compliance function in carrying out its duties. The Compliance Director reports the results of the Compliance Director's supervision to the President Director on a quarterly basis, with a copy to the Board of Commissioners.
- b. The parameters used in assessing compliance risk are the type and significance of violations committed, the frequency of violations committed or compliance track record, and violations of certain financial transaction provisions. Aside from that, DCP is in charge of implementing the Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (AML, CTF, and PFPWMD) programs, including risk assessments for the implementation of AML, CFT, PFPWMD programs in accordance with regulatory provisions.
- c. Have compliance policies and procedures in place, including AML, CTF and PFPWMD, which include, among other things, a process for constantly adapting internal provisions and systems to applicable regulations, communicating provisions to relevant workers, conducting reviews of new products/activities, conducting regular compliance tests, and worker training.
- d. BCA has compliance policies and procedures in place, including AML and CTF, which include, among other things, a process for constantly adapting internal provisions and systems to applicable regulations, communicating provisions to relevant workers, conducting reviews of new products/activities, conducting regular compliance tests, and worker training.
- e. Utilize information technology, also known as Regulatory Technology (RegTech), to improve efficiency and effectiveness in the process of regulatory provisions management.

- f. In order to support the bank's strategic positioning as a transactional bank, particularly in terms of preventing money laundering, terrorist financing, and financing for the proliferation of weapons of mass destruction, BCA has used a web-based application called STIM (Suspicious Transaction Identification Model), as well as conducting system development for applications using the latest technology and updating parameters to detect suspicious transactions.
- g. BCA also screens customer and transaction data in relation to the List of Suspected Terrorists and Terrorist Organizations (LSTTO) and the List of Financing for the Proliferation of Weapons of Mass Destruction (LFPWMD), which are published by the competent authorities when an account is opened and when BCA enters into business relations. Furthermore, if the list is changed, the filtering will be repeated.

9. Intra-Group Transaction Risk

- a. Measure and assess intra-group transaction risk through analysis of quantitative indicators such as intra-group transaction composition ratios in the Financial Conglomerate, as well as qualitative indicators such as agreement documentation, transaction fairness, and other information.
- b. Monitor intra-group transactions by preparing intra-group transaction recapitulation reports within the BCA Financial Conglomerate and periodically recapitulating intra-group transaction agreements in accordance with regulatory provisions.
- c. Have an internal policy regarding intragroup transaction risk management that is in accordance with regulatory provisions and is reviewed regularly.
- d. Ensure that every intra-group transaction within the BCA Financial Conglomerate is carried out in accordance with the Arm's Length Principle.

10. Insurance Risk

- a. Carrying out insurance risk measurements and assessments through analysis of quantitative and qualitative indicators such as technical risk ratios, insurance risk dominance over overall business lines, product risk mix and types of benefits, and reinsurance structure.
- b. Conduct regular monitoring to ensure the adequacy of the risk selection process (underwriting), premium determination (pricing), use of reinsurance, and/or claims handling.
- c. Have an internal policy related to insurance risk management guided by regulatory provisions and is reviewed regularly.

Results of the Risk Management System Effectiveness Review

Based on the results of the self-assessment, BCA's risk profile rating in 2024 is "low to moderate" both individually and when integrated with Subsidiaries.

The risk profile rating is the result of an assessment of 10 (ten) types of risk with the risk level ratings listed below:

- Risks with a "low" risk rating include Market Risk, Liquidity Risk, Legal Risk, and Intra-Group Transaction Risk.
- Risks with a risk rating of "low to moderate" include credit risk, operational risk, reputation risk, strategic risk, compliance risk, and insurance risk.

This "low to moderate" risk profile rating is achievable because BCA and its Subsidiaries have implemented an effective and efficient risk management process in all of their activities.

- 1) BCA's inherent and integrated risk trends are stable because no significant changes in inherent risk are expected. Domestic demand and positive export performance, as well as Bank Indonesia's efforts to strengthen the policy mix response to maintain stability and encourage economic growth, will support Indonesia's economic growth in 2023. In light of these circumstances, BCA FC continues to strive to capitalize on momentum to maximize business performance while remaining mindful of global financial market uncertainty, which has the potential to disrupt the national economy and have an impact on BCA FC's business activities. As a result, BCA and BCA FC always manage risks in all business activities using the prudential principle
- 2) The quality of the integrated risk management implementation will continue to be high. This is due to the BCA FC's establishment of an Integrated Risk Management Framework, which consists of strategy, organization, policies and procedures, as well as risk management infrastructure, and continuously reviews risk management in all of its activities to ensure that all risks encountered by the BCA FC can be identified, measured, monitored, controlled, and reported correctly.

The risk management policies of BCA and its Subsidiaries are constantly updated in accordance with regulatory provisions, the direction of developments in implementing the most recent Basel, prudential banking principles, and international best practices. BCA FC is always mindful of the economic situation and conditions, as well as developments in banking and non-bank financial services institutions, when conducting business.

Statement of the Board of Directors and the Board of Commissioners on the Adequacy and Effectiveness of the Risk Management System

In 2024, BCA conducted an evaluation of the risk management system in which:

- The Board of Directors evaluates the effectiveness of the risk management system at BCA through regular reviews of risk management policies and procedures, the adequacy of the risk management information system, risk exposure reports, and assessments of BCA's risk profile and Integrated risk profile.
- The Board of Commissioners supervises and evaluates the implementation of the risk management system carried out by the Board of Directors, with assistance from the Risk Oversight Committee.

Based on the findings of the evaluation and supervision, the Board of Commissioners concludes that BCA's risk management system is adequate and effective.

5) INTERNAL CONTROL SYSTEM

BCA Internal Control System is an ongoing monitoring mechanism which is established by the management and aligned with the BCA's objectives, size, and complexity. The implementation of BCA's Internal Control System is guided by Financial Services Authority Circular Letter No.35/SEOJK.03/2017 dated July 7, 2017, concerning the Standard Guidelines for Internal Control Systems for Commercial Banks.

The objective of implementing of Internal Control System

The objective of implementing an effective Internal Control System is to ensure:

- 1) Compliance with laws and regulations as well as applicable internal policies/provisions.
- 2) The availability of complete, accurate, efficient, and timely financial and management information required for appropriate and accountable decision making.
- 3) Effectiveness and efficiency of operational activities.

4) Effectiveness of risk culture in the BCA's organization as a whole.

Additionally, in order to support OJK Regulation concerning the Implementation of Integrated Risk Management, BCA develops a comprehensive Internal Control System for implementation of integrated risk management that ensures:

- 1) Compliance to internal policies or provisions, as well as applicable laws and regulations;
- 2) The availability of complete, accurate, appropriate, and timely financial and management information; and
- 3) The effectiveness of the risk culture in the Financial Conglomerate organization as a whole.

Internal Control System Framework

BCA adopt the three lines model framework to achieve reliable risk management and governance. The implementation of three lines model at BCA is as follows:

1) Governing Body

The Board of Commissioners and its committees under their coordination are responsible to ensure:

- a) Appropriate structures and processes are in place for effective governance; and
- b) Organizational objectives and activities are aligned with the prioritized interests of stakeholders.

2) First and Second Line

- a) The first line is responsible for the delivery of products and services to customers. It also manages the associated risks.
- b) The second line provides support related to risk management including responsibility for enterprise risk management. The second line role is performed by the Compliance Director, Risk Management Director, Risk Management Division (MRK), Compliance Division (DCP) and Operation Strategy and Development Group (GPOL).

3) Third Line

The third line role is carried out by the Internal Audit Division (DAI) to strengthen BCA's ability to create, protect, and maintain BCA value by providing assurance, advice, insight, and foresight that are independent, risk based, and objective, as well as acting as a strategic partner for management in building BCA into a leading bank in Indonesia through assessing the adequacy and effectiveness of BCA's governance, risk management, and internal control processes. DAI communicates audit results reports to the President Director, Board of Commissioners, and Audit Committee.

In performing their roles, all lines communicate and collaborate on a regular basis and contribute to create and protect value that is aligned with the stakeholders' interest.

Main Components of the Internal Control System

In accordance with the Internal Control Integrated Framework developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO), BCA's Internal Control system consists of 5 (five) main components, which include:

1. Oversight by Management and Control Culture

According to their roles, the Board of Directors and the Board of Commissioners are in charge of fostering a culture of control. The role of the Board of Directors is to establish structure and maintain an effective internal control system, as well as ensuring the security and reliability of the internal control system, among other by issuing the BCA's Internal Control System Standard Guidelines, policies, and operational procedures.

The Board of Commissioners has a role to oversight and assess the adequacy of internal control through committees under its coordination, such as the Audit Committee and Integrated Governance Committee. The Audit Committee assists the Board of Commissioners in carrying out oversight related to financial statements, internal control systems, implementation of internal and external audit functions, Good Corporate Governance (GCG), and compliance with applicable laws and regulations.

2. Risk Identification and Assessment

BCA has established an internal control mechanism embedded to each business unit, as a part of the Board of Directors' role in identifying, analyzing, and assessing the risks faced by BCA to ensure the targets set are met. This role is carried out by establishing a Risk Management Division (MRK), which assigned to ensure that BCA and its Subsidiaries are properly carried out risk mitigation in an integrated manner through identification, measurement, monitoring, controlling, and reporting risks in accordance with the risk management framework, and capable in dealing with emergency situations that might threaten BCA's business continuity.

BCA has conducted a thorough risk identification and assessment that includes credit risk, market risk, liquidity risk, operational risk, legal risk, reputation risk, strategic risk, compliance risk, insurance risk, and intra-group transaction risk. Moreover, BCA consistently conducts Risk Control Self-Assessment (RCSA) to review the inherent risks in the main function of each work unit.

3. Control Activities and Segregation of Duties

Based on the internal control framework and components, BCA implements internal controls to ensure the adequacy of financial controls, operational effectiveness and efficiency, and compliance with applicable laws and regulations. In addition, the establishment of policies, manuals and operating procedures guide the implementation of duties and segregation of functions in each work unit so that each individual in his/her position does not have the opportunity to make mistakes/deviations in the implementation of these duties.

Monitoring and reviewing of the implementation of the above duties and functions is carried out by the MRK and DAI as independent work units in the second and third lines. An Assessment Report by DAI on the adequacy and effectiveness of the governance, risk management, and internal control processes is reported to the Board of Directors, Board of Commissioners and the Audit Committee.

The implementation of internal control includes:

a. Financial Control

To ensure the successful implementation of strategic plan that supports BCA's development, BCA has applied the following:

- 1) The Board of Directors has prepared and received approval from the Board of Commissioners on the strategic plan and Annual Work Plan and Budget (RKAT), which are stipulated in the Bank's Business Plan (RBB) as a blueprint for a 3 (three) year business strategy, which has been distributed to BCA management who relates to its implementation.
- 2) The strategy implemented has considered the impact of strategic risk to BCA's capital, including projected capital and the Minimum Capital

Adequacy Requirement (KPMM).

- 3) The Board of Directors actively conducts discussions/provides input, as well as monitoring internal conditions and developments of external factors both directly or indirectly affect BCA's business strategy.
- 4) BCA implements financial control process in the Bank and member of BCA financial conglomerates, in order to periodically monitor BCA's performance achievements through the Corporate Strategy and Planning Division to improve the growth and performance of BCA and its Subsidiaries.
- 5) BCA has ensured that all accounting policies and standards are periodically renewed in accordance with applicable law and regulations.

b. Operational Control

In order to support overall operational risk control, BCA has implemented the following:

- 1) Forming the BCA organizational structure, including:
 - Segregation of duties to avoid conflict of interest.
 - Supervisor whose function is to oversight the implementation of internal control.
 - Internal supervision which functions to ensure the implementation of internal control in operational work units.
 - DAI, which is independent of the risktaking unit, evaluates and assesses the adequacy and effectiveness of corporate governance, risk management, and internal control processes for BCA and member of the BCA financial conglomerate.
 - MRK and DCP, which are independent to the risk-taking unit.
 - Anti-Fraud Bureau to increase the effectiveness of the implementation of anti-fraud strategies for all company activities.
- 2) Every banking operational transaction carried out at BCA has work procedures outlined in the work manual, to ensure that operational risks that may exist in these activities have been properly mitigated.
- 3) Establish employee rotation policies.
- 4) Setting up limit and authority for officers to transact.
- 5) Establish Information Security Policy, including: User ID access and password, physical security, etc.
- 6) Establishment of information security management system policies, standards, and procedures required to safeguard assets related to the implementation and use of IT.
- 7) Evaluate the results of the review and testing of the Disaster Recovery Plan.
- 8) Determination of policies and procedures regarding the use of IT service providers.

c. Compliance with Applicable Laws and Regulations

To ensure BCA's compliance with applicable laws and regulations, BCA has implemented the following:

- 1) BCA is committed to comply with applicable laws and regulations and taking corrective action for any risk weaknesses that may occur.
- 2) BCA has established a DCP work unit that is independent of the risk-taking unit and is responsible to monitor the compliance of BCA and its Subsidiaries in an integrated manner.
- 3) BCA has:
 - Monitor Compliance Reporting to BI/ OJK/other regulators.

- Submitted BCA Compliance Reports, including Anti-Money Laundering and Counter-Terrorism Financing Program Implementation Report to OJK every 6 (six) months.
 - Submitted Compliance Monitoring Reports on BCA's Prudential Provisions, including Anti-Money Laundering and Counter-Terrorism Financing Program Implementation Report to the Board of Commissioners, President Director, and Deputy President Director quarterly.
- 4) The Compliance Risk Management Strategy is to have a policy to always comply with applicable regulations, namely proactively carrying out prevention (ex-ante) in order to minimize the occurrence of violations and taking curative action (ex-post) in the context of improvement.

Internal Control System Evaluation

The Board of Directors is responsible for ensuring the implementation of an effective internal control system to achieve BCA's objectives. The Board of Commissioners, assisted by the Audit Committee, Risk Oversight Committee, and Integrated Governance Committee, is in charge of overseeing the implementation of BCA's Internal Control System.

In order to evaluate the adequacy and effectiveness of the internal control system, in 2024 BCA has monitored and taken corrective actions as follows:

- 1) BCA continuously evaluate and monitor the overall effectiveness of the implementation of internal control, including in the event of changes in internal and external factors that may affect BCA's ability to achieve its targets.
- 2) BCA prioritized monitoring on its key risks and functions as part of daily activities, including periodic evaluations to detect and prevent the occurrence of new risks, both by the operational and risk monitoring work unit as well as DAI.
- 3) DAI evaluates the adequacy and effectiveness of the internal control system independently and objectively through the implementation of risk-based audit activities. The results of the evaluation and follow-up are reported to the Board of Commissioners, the Audit Committee, and the Board of Directors.

Board of Commissioners Statement on the Adequacy and Effectiveness of the Internal Control System

Based on its review and discussion with the Audit Committee of the assessment report submitted by management, the Board of Commissioners is of the opinion that BCA's system of internal control is adequate and effective.

4. Accounting, Information, and Communication Systems

BCA has an adequate accounting, information, and communication system to identify potential problems. The System is also used as an information exchange to carry out task according to their responsibilities. The accounting system produces financial information that is accurate, precise and consistent because BCA has an accounting policy that are complied with applicable principles and regulations and are supported by an effective recording system and well-documented reconciliation process. The information system is continuously developed in line with developments in the Bank's business and technology as well as an effective communication system so that all BCA employees understand and comply with applicable policies and procedures in carrying out their duties and responsibilities. BCA has also communicated with external parties, such as regulators and shareholders, and implemented a whistleblowing system.

BCA has conducted a review by an independent party to ensure that its information system can provide data and information related to business activities, financial conditions, the implementation of risk management, and compliance with regulations that are relevant, accurate, current, timely, and accessible to stakeholders and reported consistently to support the Board of Directors' and Board of Commissioners' duties

5. Monitoring Activities and Deviation Corrective Action

Monitoring and testing of the adequacy and effectiveness of the risk management, internal control, and governance framework processes is carried out by DAI as an independent work unit and reported to the Board of Directors, Board of Commissioners, and Audit Committee.

DAI takes on the role of monitoring and analyzing the adequacy of follow-up by work unit on finding result and recommendations from DAI, external auditors, and the result of supervision by OJK as well as other authorities. The result of the DAI's follow-up monitoring is reported to the Board of Directors, the Board of Commissioners and the Audit Committee on a quarterly basis. Changes to targets for the completion of significant audit results follow-up must be sought for approval from the President Director and the Board of Commissioners.

6) PROVISION OF FUND TO RELATED PARTY AND LARGE EXPOSURE

In accordance with the OJK Regulation concerning the Implementation of Commercial Bank Governance, Banks are required to apply the principle of prudence in providing funds, at least by implementing the distribution or diversification of the portfolio of funds provided. Disclosure of the provision of funds to related parties (individuals or groups, including the Board of Directors, Board of Commissioners, Bank Executive Officers, and other related parties) and the provision of large exposure refers to the OJK Circular Letter concerning the Implementation of Governance for Commercial Banks, section Transparency in the Implementation of Governance. In providing funds to related parties and providing large exposures, BCA always applies the principle of prudence, including determining limits on the provision of funds and large exposures to certain parties and/or business groups with the aim of avoiding bank business failure as a result of funds provision concentration and increasing the independence of the Bank's Board of Directors and Board of Commissioners regarding potential intervention from related parties and carried out in accordance with applicable regulations.

Policy on the Provision of Large Exposure

Provision of large exposure refers to the nominal provision of funds to 1 (one) borrower or 1 (one) group of borrowers other than Related Parties in the amount equal to or greater than 10% (ten percent) of the Bank's core capital (Tier 1). The provision of large exposure must be analyzed for feasibility in the same or more prudent manner as the provision of funds to general debtors. The terms and conditions for funds provision are consistent with BCA's credit terms and procedures.

Lending Policy for the Boards of Directors and the Board of Commissioners

BCA already has lending policies for the Board of Directors and the Board of

Commissioners, which are governed by:

- a. Productive Credit Guidelines and Consumer Credit Guidelines;
- b. Policy on Credit Approval Mechanisms for Related Parties; and
- c. PT BCA Tbk's Policy on Basic Bank Credit (KDPB), dated September 22, 2023.

The Board of Directors and Board of Commissioners Credit Loan Policy stipulates that credit loans to the Board of Directors and Board of Commissioners are granted on an arm's length basis and in accordance with applicable general procedures for funds provision.

Implementation of the Provision of Funds to Related Parties in 2024

In 2024, BCA has implemented a policy of providing funds to related parties, a policy of providing large exposure, and a policy of providing loans to the Board of Directors and the Board of Commissioners in accordance with applicable regulations, which must comply with the following provisions:

1. Provision of funds to related parties and plans for granting credit to certain large debtors, must be decided by the credit officer and approved by the BCA's Board of Commissioners independently.
2. Provision of funds to related parties must not conflict with the general lending terms and procedures in place and must continue to generate a reasonable profit for BCA.
3. The policy for determining credit terms for related parties, particularly the determination of lending rates and forms and types of collateral, adheres to BCA's generally accepted credit provisions.

Routine LLL reporting to OJK or Bank Indonesia is carried out in a timely manner. Throughout 2024, there were no violations of LLL (Legal Lending Limit). Provision of Funds to Related Parties and to Individual and Group Core Debtors (Large Exposure) at BCA in 2024:

Fund Provision	Total	
	Debtor/Group	Nominal
To Related Parties	701	Rp9,945,105,205,075.00
To Main Debtors:		
• Individual	50	Rp235,860,671,567,164.00
• Group	30	Rp336,445,965,964,081.00

7) STRATEGIC PLAN

The Board of Commissioners and the Board of Directors are always active in establishing communication and aligning views on BCA's business strategy in the banking sector. The Board of Commissioners is responsible for directing, monitoring, and evaluating the implementation of BCA's strategic policies and providing advice to the Board of Directors in accordance with the aims and objectives of BCA's Articles of Association. The Board of Directors is responsible for the development process, implementation, including reviewing of BCA's strategy to comply with internal policies and applicable regulations.

In 2024, the Board of Commissioners and the Board of Directors have reviewed, monitored, and supervised the implementation of BCA's strategy through a Joint Meeting of the Board of Directors and the Board of Commissioners with an agenda regarding Strategic Plan involving related work units.

Strategic Priorities for BCA and Projections for 2025

Broadly, BCA's short to medium-term policy direction and strategic steps will focus on key strategic initiatives, including:

a) Strengthening the transaction banking franchise through enhanced payment settlement service capabilities

As a bank with transaction banking as one of its core businesses, BCA is committed to meeting the increasingly diverse needs of its customers. To achieve this, BCA is committed to consistently improving payment settlement service capabilities from various aspects to support the growth of CASA (Current Accounts and Savings Account).

BCA's multi-channel transaction banking ecosystem continuously expanded and refined to provide services that are more integrated within the BCA ecosystem and provide added-value to customers. BCA also continues to focus on implementing a hybrid banking business model, combining physical and digital services, which is expected to provide customers with an easy, safe, and convenient transaction experience.

b) Maintaining a sound Loan Portfolio

In conducting its business, BCA will continue to disburse loans selectively with due regard to the precautionary principle. BCA will continue to explore new industries with high potential through an in-depth analysis process to increase industry diversification. In maintaining the quality of its loan portfolio, BCA continuously monitors and takes proactive measures to maintain credit quality.

To support credit processing and debtor acquisition, BCA will continue to develop and improve credit infrastructure through simplification and optimization of credit processing. In addition, BCA also continues to develop the quality of PIC relationships through various programs to maintain and improve debtor satisfaction levels.

c) Providing of comprehensive banking solutions together with subsidiaries

To meet the increasingly diverse needs of various customer segments, BCA provides a comprehensive financial products and services. One of these efforts is through synergies with Subsidiaries engaged in the fields of financing, digital banking, sharia banking, securities, and insurance. BCA is committed to growing with its Subsidiaries and encouraging them to become major players in their business lines.

Category	2025 Target
Gross Domestic Product (GDP)	5%
Loan Growth	6% - 8%
Net Interest Margin (NIM)	5.7% - 5.8%
CIR (Cost to Income Ratio)	33% - 34%
Cost of Credit (CoC)	-0.3%
Return on Asset (ROA)	3.6% - 3.8%
Return on Equity (ROE)	21% - 23%

8) TRANSPARENCY OF FINANCIAL AND NON-FINANCIAL CONDITIONS UNDISCLOSED IN OTHER REPORTS

BCA has policies and procedures in place for implementing financial and non-financial transparency, including referring to:

- a. OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Bank Report Publication.
- b. OJK Regulation No. 29/POJK.04/2016 concerning Issuers' or Public Companies' Annual

Reports.

- c. OJK Regulation No. 14/POJK.04/2022 concerning Periodic Financial Report Submission for Issuers or Public Companies.
- d. OJK Circular Letter No. 16/SEOJK.04/2021 concerning the Form and Content of Issuers' or Public Companies' Annual Reports.

Information on BCA's financial and non-financial conditions has been stated clearly and transparently in several reports, both in print and on the BCA website, including the following:

Financial Condition Transparency

BCA has prepared and presented reports on financial condition transparency in accordance with the procedures, types, and scope specified in the applicable Financial Services Authority Regulation provisions, and has submitted them on a monthly, quarterly, and annual basis, depending on the type of report.

1. Annual Report

- a. Annually, BCA prepares and submits an Annual Report to the OJK, shareholders, and other institutions as required or deemed necessary. The Annual Report contains the following information:
 - 1) An overview of key financial data, such as a share overview, Board of Commissioners reports, Board of Directors reports, company profiles, management analysis, and discussions regarding business and financial performance, corporate governance, corporate social responsibility, and sustainable finance.
 - 2) Annual Financial Statement audited by PA and PAF registered with the OJK, prepared for 1 (one) financial year, and presented with a comparison of the previous 1 (one) financial year as well as the start of the previous comparative year.
 - 3) Statement of the Board of Commissioners and the Board of Directors' responsibility for the accuracy of the Annual Report's contents. This is stated on a statement sheet signed by all members of the Board of Commissioners and the Board of Directors.
- b. The Annual Report is now available on the BCA website at www.bca.co.id.
- c. The audited Annual Financial Statement has been published on the BCA website, www.bca.co.id, as well as in Indonesian-language newspapers with widespread circulation in Indonesia.

2. Quarterly Publication Report

- a. The Quarterly Published Reports have been announced in print media (Quarter II and Quarter IV) and on the BCA website, www.bca.co.id, including reporting the Quarterly Published Financial Statements to the OJK or stakeholders in accordance with the applicable OJK Regulation.
- b. Announcement of Quarterly Published Reports on the BCA website in the form of Quarterly Published Financial Statements and other reports maintained for at least the last 5 (five) financial years.
- c. Although not required, the announcement of the Quarterly Published Financial Statement in the form of the Consolidated Financial Statement of BCA and Subsidiaries in newspapers (Quarter II and Quarter IV) and the Financial Statement of the BCA Parent Entity in 1 (one) newspaper in the form of financial performance infographics is carried out. The newspaper used is an Indonesian language printed

daily newspaper with a wide circulation in the area where BCA's headquarters are located. The President Director and 1 (one) member of the BCA Board of Directors sign the Quarterly Published Financial Statement.

3. Monthly Publication Report

- a. BCA has announced the Monthly Published Reports on the BCA website, www.bca.co.id, including reporting the Monthly Published Financial Statements to the OJK in accordance with the applicable OJK Regulation.
- b. Announcement of Monthly Published Reports on the BCA website in the form of Monthly Published Financial Statement maintained for at least the last 5 (five) financial years.

Non-Financial Condition Transparency

BCA has prepared and presented reports on the transparency of non-financial conditions in accordance with the procedures, types, and scope specified in the applicable OJK Regulation provisions, as well as providing and publishing other non-financial condition information, such as the following:

- a) Transparently publish non-financial conditions to stakeholders, including Routine LLL Reporting to OJK, corporate governance information through the BCA Governance Implementation Report, which is published on the BCA website, and information on other non-financial conditions that are also made transparent in Analyst Meetings, Press Conference, Public Expose and Non-Deal Road Show, and BCA website in accordance with applicable regulations.
- b) Disclose ownership structure transparency in the Annual Report and on the BCA website.
- c) Disclose important and relevant information or facts regarding events, happenings, or facts that may have an impact on stock exchange prices and/or the decisions of investors, potential investors, or other parties with an interest in such information or facts. BCA always submits information reports or material facts to the Indonesian Stock Exchange and the BCA website.
- d) In accordance with OJK provisions regarding Transparency of Bank Product Information and Use of Customer Personal Data, BCA has published information regarding BCA products and/or services in a clear, accurate, and up-to-date manner. Customers can easily obtain this information, which is available in the form of leaflets, brochures, or other written forms at each BCA branch office in easily accessible locations, and/or electronic information provided via the service hotline/call center, the BCA website, and BCA's official social accounts.
- e) In accordance with OJK provisions governing Customer Complaints and Banking Mediation, BCA provides and informs customers about procedures for customer complaints and dispute resolution, including through the BCA website, www.bca.co.id. In addition, BCA customer complaints mediation are resolved through complaint facilities such as the BCA Branch Office or Halo BCA at 1500888, the Halo BCA application, or e-mail HaloBCA@bca.co.id.
- f) Prepare internal reporting that is complete, accurate, and on time, supported by an adequate management information system. BCA has a dependable BCA management information system that is supported by competent human resources and an adequate IT security system capable of providing complete, accurate, and timely information to the Board of Directors to aid in BCA's business decision-making process.

- g) Other information aimed at assisting with information disclosure, financial education, and community service.

9) OWNERSHIP OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS WHICH AMOUNTING TO 5% OR MORE OF PAID-UP CAPITAL

BCA policy in terms of reporting share ownership of members of Board of Directors refers to OJK Regulation concerning the Implementation of Governance for Commercial Banks and Article 2 of OJK Regulation No. 11/ POJK.04/2017 concerning Reports on Ownership or Any Changes in Share Ownership of Public Companies, and OJK Regulation No. 4 of 2024 concerning Reports on Ownership or Any Changes in Share Ownership of Public Companies and Reports on Activities of Pledge of Shares of Public Companies.

Table of Share Ownership of the Board of Directors Amounting to 5% or more as of December 31, 2024

Name	Share Ownership of the Board of Directors Amounting to 5% or more at:			
	BCA	Other Bank	Non-Bank Financial Institution	Other Companies
Jahja Setiaatmadja	-	-	-	√
Gregory Hendra Lembong	-	-	-	√
Armand Wahyudi Hartono	-	-	-	√
Tan Ho Hien/Subur/Subur Tan	-	-	-	-
Rudy Susanto	-	-	-	-
Lianawaty Suwono	-	-	-	-
Santoso	-	-	-	-
Vera Eve Lim	-	-	-	-
Haryanto T. Budiman	-	-	-	-
Frengky Chandra Kusuma	-	-	-	-
John Kosasih	-	-	-	-
Antonius Widodo Mulyono	-	-	-	-

Note:
√ own shares with an amount of 5% or more..

All members of the Board of Directors do not have indirect ownership of BCA shares. BCA Board of Directors own 0.052% of BCA shares cumulatively. The following are details of BCA share ownership along with the percentage at the beginning and end of the financial year by members of the Board of Directors directly in 2024.

Total BCA Share Ownership by the Board of Directors in 2024

Board of Directors	Number of Ownership at the Beginning of the Year	Percentage	Number of Ownership at the End of the Year (as of December 31, 2024)	Percentage
Jahja Setiaatmadja	32,818,853	0.027%	33,850,785	0.027%
Gregory Hendra Lembong	784,719	0.001%	977,547	0.001%
Armand Wahyudi Hartono	4,256,065	0.003%	4,256,065	0.003%
Tan Ho Hien/Subur/Subur Tan	11,351,057	0.009%	10,710,172	0.009%
Rudy Susanto	2,518,448	0.002%	2,908,127	0.002%
Lianawaty Suwono	2,021,880	0.002%	2,264,685	0.002%
Santoso	2,422,053	0.002%	2,690,902	0.002%
Vera Eve Lim	1,912,261	0.002%	2,212,324	0.002%
Haryanto T. Budiman	561,695	0.000%	776,099	0.001%
Frengky Chandra Kusuma	1,891,049	0.002%	2,107,984	0.002%
John Kosasih	504,861	0.000%	731,076	0.001%
Antonius Widodo Mulyono	130,780	0.000%	262,511	0.000%
TOTAL	61,173,721	0.050%	63,748,277	0.052%

BCA's policy on share ownership reporting by members of the Board of Commissioners refers to Article 57 of OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, OJK Circular Letter No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks, Article 2 of OJK Regulation No. 11/ POJK.04/2017

concerning Reports on Ownership or Any Changes in Share Ownership of Public Companies, and OJK Regulation No. 4 of 2024 concerning Reports on Ownership or Any Changes in Share Ownership of Public Companies and Reports on Activities of Pledge of Shares of Public Companies.

Table of Share Ownership of Members of the Board of Commissioners Reaching 5% (five percent) or More of Paid-up Capital as of December 31, 2024

Name	Share ownership of members of the Board of Commissioners amounting to 5% or more in:			
	BCA	Other Bank	Non-Bank Financial Institution	Other Companies
Djohan Emir Setijoso	-	-	-	√
Tonny Kusnadi	-	-	-	√
Cyrillus Harinowo	-	-	-	√
Raden Pardede	-	-	-	√
Sumantri Slamet	-	-	-	-

All members of the Board of Commissioners do not have indirect ownership of BCA shares. The BCA Board of Commissioners owns 0.093% of BCA shares cumulatively. The following is a breakdown of BCA share ownership along with the percentage at the beginning and end of the financial year by members of the Board of Commissioners directly in 2024.

Table of Number of BCA Share Ownership by the Board of Commissioners in 2024

Board of Directors	Number of Ownership at the Beginning of the Year (as of January 1, 2024)	Percentage	Number of Ownership at the End of the Year (as of December 31, 2024)	Percentage
Djohan Emir Setijoso	106,610,700	0.086%	106,824,845	0.087%
Tonny Kusnadi	7,087,982	0.006%	7,269,681	0.006%
Cyrillus Harinowo	N/A	N/A	N/A	N/A
Raden Pardede	N/A	N/A	N/A	N/A
Sumantri Slamet	N/A	N/A	N/A	N/A
TOTAL	113,698,682	0.092%	114,094,526	0.093%

10) AFFILIATED RELATIONSHIPS

The definition of having affiliated relationships among members of the Board of Directors, the Board of Commissioners, and the Controlling Shareholders, either directly or indirectly are as follows:

1. Financial relationship, in which the members of the Board of Directors and the Board of Commissioners receive income, financial assistance, and loan from:
 - a. other BCA's members of the Board of Directors and/or the Board of Commissioners;
 - b. company which its controlling shareholder is BCA's member of the Board of Directors and/or the Board of Commissioners; and/or
 - c. BCA's controlling shareholder and/or ultimate controlling shareholder.
- Familial relationship, either horizontally or vertically, until the second degree, with other BCA's members of the Board of Directors, the Board of Commissioners.

All members of the Board of Commissioners and the Board of Directors of BCA have no affiliated relationships, either financial or familial relationships, with fellow members of the Board of Commissioners, the Board of Directors, and Controlling Shareholders and/or Ultimate Controlling Shareholders, except for Mr. Armand W. Hartono, who has an affiliated relationship (familial and financial relationships) with the Ultimate Controlling Shareholder, namely Mr. Robert Budi Hartono. The details of this disclosure are as follows.

Affiliated Relationships of BCA's Board of Directors Members

Affiliated relationships of the members of the Board of Directors are shown in the table below:

Table of Affiliated Relationships of BCA's Board of Directors Members

Name	Position	Familial Relationship with								Financial Relationship with:							
		Board of Commissioner		Board of Director		Controlling Shareholder		Ultimate Controlling Shareholder		Board of Commissioner		Board of Director		Controlling Shareholder		Ultimate Controlling Shareholder	
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Jahja Setiaatmadja	President Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Gregory Hendra Lembong	Deputy President Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Armand Wahyudi Hartono	Deputy President Director	-	√	-	√	-	√	√	-	√	-	√	-	√	√	-	√
Tan Ho Hien/ Subur atau Subur Tan	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Rudy Susanto	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Lianawaty Suwono	Director (concurrently Director in charge of Compliance function)	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Santoso	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Vera Eve Lim	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Haryanto T. Budiman	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Frengky Chandra Kusuma	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
John Kosasih	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Antonius Widodo Mulyono	Director	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√

Affiliated Relationships of BCA's Board of Commissioners Members

Affiliated relationships of the members of the Board of Commissioners are shown in the table below:

Table of Affiliated Relationships of BCA's Board of Commissioners Members

Name	Position	Familial Relationship with								Financial Relationship with:							
		Board of Commissioner		Board of Director		Controlling Shareholder		Ultimate Controlling Shareholder		Board of Commissioner		Board of Director		Controlling Shareholder		Ultimate Controlling Shareholder	
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Ir. Djohan Emir Setijoso	President Commissioner	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Tonny Kusnadi	Commissioner	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Cyrellus Harinowo	Independent Commissioner	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Raden Pardede	Independent Commissioner	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√
Sumantri Slamet	Independent Commissioner	-	√	-	√	-	√	-	√	-	√	-	√	-	√	-	√

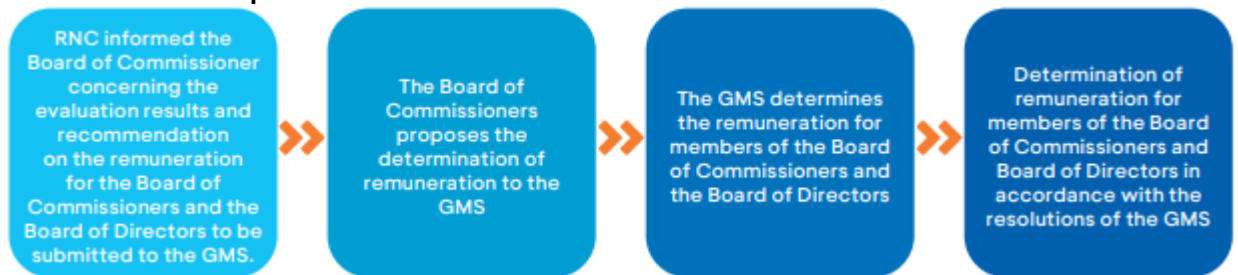
11) REMUNERATION POLICY

1. Procedures for Determining Remuneration for the Board of Commissioners and the Board of Directors

The remuneration for the Board of Commissioners and the Board of Directors of BCA is determined based on the procedures, structure, and indicators outlined in the Articles of Association of BCA and the Board of Commissioners' Decree No. 116/SK/KOM/2023 dated July 6, 2023 concerning Remuneration Policy for Board of Directors and Board of Commissioners, in accordance with the following provisions:

- a. OJK Regulation concerning the Implementation of Good Corporate Governance for Commercial Banks.
- b. OJK Regulation No. 45/POJK.03/2015 concerning the Implementation of Governance in the provision of Remuneration for Commercial Banks.
- c. OJK Circular Letter No. 40/SEOJK.03/2016 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks.

Remuneration Proposal and Determination Scheme



In accordance with BCA's AGMS dated March 14, 2024, has been granted the power and authority to::

- a. The Board of Commissioners to determine the amount of salary and other benefits for members of the Board of Directors, considering the recommendations of the Remuneration and Nomination Committee (RNC);
- b. BCA's majority shareholders to determine the amount of salary and other benefits payable to members of the Board of Commissioners;
- c. BCA's majority shareholders to determine the distribution of tantiem to members of the BCA's Board of Commissioners and Board of Directors.

2. Remuneration for the Board of Directors

Board of Directors Remuneration Structure

Details of the remuneration package and facilities received by the Board of Directors, including the remuneration structure and details of nominal amounts over the last 2 (two) years, are shown in the table below:

Type of Remuneration and Facilities	Total Received in 1 (one) year			
	2024		2023	
	People	In million Rp	People	In million Rp
Salary, bonuses, regular allowances, tantiem and other facilities in non-natura form	12	836,970	12	686,380
Other facilities in form of natura (housing, health insurance, etc.) which:				
1. Entitled	-	-	-	-
2. Not Entitled	-	-	-	-
Total	12	836,970	12	686,380

3. Remuneration for the Board of Commissioners

Board of Commissioners Remuneration Structure

Details of the remuneration packages are grouped according the level of income received by the Board of Directors over the last 2 (two) years, as shown in the table below:

Type of Remuneration and Facilities	Total Received in 1 (one) year			
	2024		2023	
	People	In million Rp	People	In million Rp
Salary, bonuses, regular allowances, tantiem and other facilities in non-natura form	5	217,129	5	173,842
Other facilities in form of natura (housing, health insurance, etc.) which:				
1. Entitled	-	-	-	-
2. Not Entitled	-	-	-	-
Total	5	217,129	5	173,842

12) SHARES OPTION

There are no share options received by the Board of Directors, Board of Commissioners and Executives Officers during 2024.

13) DATA ON SALARY AND SEVERANCE PAID RATIO

Ratio of Highest and Lowest Salary, which includes:

Salary Ratio	2024	2023
The ratio of the highest to lowest Employee salary	24.54	26.89
The ratio of the Board of Directors' highest and lowest salary	2.70	2.85
The ratio of the Board of Commissioners' highest and lowest salary	1.52	1.52
The ratio of the Board of Directors' highest salary and the employees' highest salary	9.51	8.63
The ratio of the annual compensation of the President Director and the median/mean of the annual compensation of all employees (except the President Director)	118.70	115.88

14) MEETINGS OF THE BOARD OF COMMISSIONERS, THE BOARD OF DIRECTORS, AND JOINT MEETINGS

a) Meeting of the Board of Directors

Meeting Policy

The Board of Directors Meeting Policy in the Board of Directors Charter and/or Articles of Association regulates, among other:

a. Meeting Mechanism

Board of Directors meetings can be held in person or virtually via teleconference media, video conferences, or other forms of electronic media.

b. Meeting Frequency

- i. Board of Directors meetings must be held periodically, at least once a month or 12 (twelve) times per year.
- ii. Each member of the Board of Directors must attend at least 75% (seventy-five percent) of the meetings in 1 (one) year.

c. Meeting Summons

- i. Summons for the Board of Directors meeting is made by the Board of Directors Bureau via e-mail to all Directors no later than 5 (five) working days before the meeting is held (H-5).
- ii. For Board of Directors meetings that have been scheduled or are based on the decisions of the previous Board of Directors meeting, there is no need to summon a meeting.
- iii. For Board of Directors meetings that are held outside of a predetermined schedule, summons must be made no later than 1 (one) day before the Board of Directors meeting is held, or in a shorter time if it is urgent.
- iv. The summons for the meeting must include the agenda (date, time, place, and topic) and attach meeting materials.
- v. The Board of Directors confirms attendance to the Board of Directors Bureau.

d. Meeting Materials and Scheduling

- i. Prior to the end of the financial year, the Board of Directors must schedule a meeting of the Board of Directors, as well as a meeting of the Board of Commissioners with the Board of Directors for the following year and upload it on the BCA website.

- ii. On a scheduled meeting, meeting materials are distributed to participants no later than 5 (five) working days before the meeting is held (H-5).
- iii. In the event that a meeting is held outside the schedule, the meeting materials shall be submitted to the meeting participants no later than before the meeting is held.

- e. Meeting Resolutions and Quorum
 - i. The meeting of the Board of Directors is valid and has the authority to make binding decisions if more than $\frac{2}{3}$ (two-third) of the total number of members of the Board of Directors are present or represented at the meeting.
 - ii. Every strategic policy and decision must be made at a Board of Directors meeting with due regard for supervision in accordance with the Board of Commissioners' duties and responsibilities.
 - iii. Decisions-making at the Board of Directors meeting must be made first through deliberation for consensus.
 - iv. Decisions are made based on the affirmative votes of more than $\frac{1}{2}$ (one-half) of the total valid votes cast at the meeting in question if the deliberations do not reach consensus.
 - v. The Board of Directors may also make valid decisions without summoning a meeting of the Board of Directors if all members of the Board of Directors have been notified in writing, have given their approval to the proposals submitted, and have signed the agreement. Decisions made in this manner have the same power as those made formally at a meeting of the Board of Directors.
 - vi. All decisions made at Board of Directors meetings are binding and the responsibility of all Board of Directors members.
- f. A member of the Board of Directors may only be represented by another member of the Board of Directors on the basis of a special power of attorney made for the purpose of the meeting, provided that it does not remove the right to vote for:
 - i. Meeting attendance quorum; and
 - ii. The decision-making quorum is in accordance with the power given so their voting rights are counted in the meeting quorum.
- g. Minutes of Meeting
 - i. The results of the Board of Directors meeting must be stated in the Minutes of Meeting, which are signed by all members of the Board of Directors present and submitted to all members of the Board of Directors.
 - ii. Minutes of meetings of the Board of Directors must be properly documented in accordance with the provisions of the relevant regulations.
 - iii. Dissenting opinions that occur at a Board of Directors meeting must be included in writing in the Minutes of Meeting, including reasons for the dissent.

Implementation

Throughout 2024, the Board of Directors has organized 47 (forty-seven) times meetings of the Board of Directors, which were held in person and via teleconference. BCA has complied

with the OJK Regulation provision regarding the minimum frequency of the holding of Board of Directors meetings. The frequency and attendance rate of members of the Board of Directors throughout 2024 are as follows:

Name	Number of Meetings	Number of Attendance	Percentage of Attendance
Jahja Setiaatmadja	47	43	91%
Gregory Hendra Lembong	47	40	85%
Armand Wahyudi Hartono	47	41	87%
Tan Ho Hien/Subur atau Subur Tan	47	43	91%
Rudy Susanto	47	40	85%
Lianawaty Suwono	47	44	94%
Santoso	47	44	94%
Vera Eve Lim	47	44	94%
Haryanto T. Budiman	47	43	91%
Frengky Chandra Kusuma	47	44	94%
John Kosasih	47	45	96%
Antonius Widodo Mulyono	47	44	94%

Board of Directors Meeting Schedule in 2025

BCA has scheduled the following Board of Directors meeting in 2025 as follows:

Month	Date
January	2,9,14,16,23,28,30
February	6,11,13,20,25,27
March	6,11,13,20,25,27
April	3,8,10,17,22,24
May	1,8,13,15,22,27, 29
June	5,10,12,19,24,26
July	3,8,10,17,22,24, 31
August	7,12,14,21,26,28
September	4,9,11,18,23,25
October	2,9,14,16,23,28, 30
November	6,11,13,20,25,27
December	4,9,11,18,23,25

The Board of Directors meeting schedule may change at any time as needed.

The plan for the Board of Directors meeting schedule for 2025 has been published on the BCA website since December 2024 and can be accessed at: <https://www.bca.co.id/en/tentang-bca/tatakelola/struktur-organisasi>.

b) Meeting of the Board of Commissioners

Meeting Policy

The Board of Commissioners Meeting Policy, which is outlined in the Board of Commissioners Charter and/or Articles of Association, governs, among other things:

1) Meeting Mechanism

Board of Commissioners meetings can be held in person or virtually via teleconference media, video conferences, or other forms of electronic media.

2) Meeting Frequency:

- Board of Commissioners meetings must be held periodically at least once every 2 (two) months or 6 (six) times per year.
- Each member of the Board of Commissioners must attend at least 75 % (seventy-five percent) of the meetings in 1 (one) year

3) Meeting Summons

- There is no need to summon a meeting for meetings of the Board of Commissioners that have been scheduled or are based on the decision of the previous meeting of the Board of Commissioners.
- For Board of Commissioners meetings held outside of the predetermined schedule, the summons must be made no later than 1 (one) day before the meeting, or in a shorter time if it is urgent.
- The summon for a meeting of the Board of Commissioners must include the agenda/topic, date, time, mechanism and place of the meeting and attach meeting materials.
- The summons for Board of Commissioners meetings must be made in writing and delivered to each member of the Board of Commissioners via registered mail, courier service, electronic mail (e-mail), or other means deemed effective by the Board of Commissioners.

4) Meeting Materials and Scheduling

- Prior to the end of the financial year, the Board of Commissioners must schedule a meeting of the Board of Commissioners as well as a meeting with the Board of Directors by inviting the Board of Directors for the following year and upload it on the BCA website.
- At a scheduled meeting, meeting materials are distributed to participants no later than 5 (five) working days before the meeting is held (H-5).
- In the event that a meeting is held outside the schedule, the meeting materials shall be submitted to the meeting participants no later than before the meeting is held.

5) Meeting Resolutions and Quorum

- The meeting of the Board of Commissioners is valid and has the authority to make binding decisions if more than $\frac{2}{3}$ (two-third) of the total number of members of the Board of Commissioners are present or represented at the meeting.
- Decision-making at the Board of Directors meeting must be made first through deliberation for consensus.
- Decisions are made based on the affirmative votes of more than $\frac{1}{2}$ (one-half) of the total valid votes cast at the meeting in question if the deliberations do not reach a consensus.
- The Board of Commissioners may also make valid decisions without summoning a meeting of the Board of Commissioners if all members of the Board of Commissioners have been notified in writing, have given their approval to the proposals submitted, and have signed the agreement. Decisions made in this manner have the same power as those made formally at a meeting of the Board of Commissioners.
- All decisions made at Board of Commissioners meetings are binding and the

responsibility of all Board of Commissioners members.

- 6) A member of the Board of Commissioners may only be represented by another member of the Board of Commissioners on the basis of a special power of attorney drawn up specifically for the purpose of the meeting.
- 7) Board of Commissioners Minutes of Meeting
 - The minutes of the Board of Commissioners meeting must include the results of the meeting, which must be signed by all members of the Board of Commissioners present
 - Minutes of Meeting must be properly documented in accordance with applicable regulations.
 - In the event of a dissenting opinion is expressed, it must be clearly stated in the minutes of the Board of Commissioners meeting, including the reasons for the dissent.

Implementation

Throughout 2024, BCA has held 44 Board of Commissioners meetings both in person and via teleconference. BCA has complied with the Financial Services Authority Regulation provision regarding the minimum frequency of Board of Commissioners meetings.

Frequency of Attendance, Schedule, and Meeting Agenda of the Board of Commissioners throughout 2024:

Name	Number of Meetings	Number of Attendance	Percentage of Attendance
Djohan Emir Setijoso	44	44	100%
Tonny Kusnadi	44	43	97.7%
Cyrillus Harinowo	44	42	95.4%
Raden Pardede	44	40	90.1%
Sumantri Slamet	44	44	100%

Board of Commissioners Meeting Schedule for 2025

BCA has scheduled the following Board of Commissioners meetings in 2025:

Month	Date
January	8, 15, 22
February	5, 12, 19, 26
March	5, 19
April	9, 16, 23, 30
May	7, 14, 21, 28
June	4, 11, 18, 25
July	2, 9, 16, 23
August	6, 13, 20, 27
September	3, 10, 17, 24
October	1, 15, 22, 29
November	5, 12, 19, 26
December	3, 10

The Board of Commissioners' meeting schedule is subject to change at any time as needed. The plan for the 2024 Board of Commissioners' meeting schedule has been published on the BCA website since December 2024 and can be accessed at <https://www.bca.co.id/en/tentang-bca/tatakelola/struktur-organisasi>.

c) Joint Meeting of the Board of Commissioners and the Board of Directors

The Joint Meeting Policy is contained in the Board of Directors Charter and the Board of Commissioner Charter as well as Articles of Association. The policy regulates, among other:

1) Meeting Policy

Joint meetings can be held in person or virtually via teleconference media, video conferences, or other forms of electronic media.

2) Meeting Frequency

The Board of Directors and the Board of Commissioner must hold regular joint meeting at least once every 4 (four) months.

3) Meeting Summons

- For joint meetings that have been scheduled or are based on the decisions of the previous joint meeting, there is no need to summon a meeting.
- For meetings that are held outside of a predetermined schedule, summons must be made no later than 1 (one) day before the joint meeting is held, or in a shorter time if it is urgent.
- The summons for the meeting must include the agenda (date, time, place, and topic) and attach meeting materials.
- The summons for the meetings must be made in writing and delivered to the meeting participants via registered mail, courier service, electronic mail (e-mail), or other means deemed effective.

4) Meeting Materials and Scheduling

- Prior to the end of the financial year, the Board of Commissioners and the Board of Directors must schedule a joint meeting for the following year.
- At a scheduled meeting, meeting materials are distributed to participants no later than 5 (five) working days before the meeting is held (H-5).

5) Meeting Resolutions and Quorum

- The meeting is deemed valid and has the authority to make binding decisions if more than $\frac{1}{2}$ (one-half) of the total number of members of the Board of Commissioners and members of the Board of Directors are present or represented at the meeting.
- Decisions-making at the joint meeting must be made first through deliberation for consensus.
- Decisions are made based on the affirmative votes of more than $\frac{1}{2}$ (one-half) of the total valid votes cast at the meeting in question if the deliberations do not reach a consensus.
- All decisions made at joint meetings are binding.

6) A member of the Board of Directors may only be represented by another member of the Board of Directors and a member of the Board of Commissioners may only be

represented by another member of the Board of Commissioner on the basis of a special power of attorney made for the purpose of the meeting.

7) Minutes of Meeting

- The results of the meeting must be stated in the Minutes of Meeting, which are signed by all members of the Board of Directors and members of the Board of Commissioners present and submitted to all members of the Board of Directors and members of the Board of Commissioners.
- Dissenting opinions that occur at the meeting must be clearly stated in the Minutes of Meeting including reasons for the dissent.

Implementation

Throughout 2024, the Board of Commissioners and the Board of Directors have organized 6 (six) joint meetings, which were held in person and via teleconference.

Frequency of Attendance of the Board of Commissioners and Board of Directors in Joint Meetings of the Board of Commissioners and the Board of Directors throughout 2024:

Name	Number of Meetings	Number of Attendance	Percentage of Attendance
Djohan Emir Setijoso	6	6	100%
Tonny Kusnadi	6	6	100%
Cyrillus Harinowo	6	6	100%
Raden Pardede	6	6	100%
Sumantri Slamet	6	6	100%
Jahja Setiaatmadja	6	6	100%
Gregory Hendra Lembong	6	6	100%
Armand Wahyudi Hartono	6	6	100%
Tan Ho Hien/Subur atau Subur Tan	6	6	100%
Rudy Susanto	6	5	83%
Lianawaty Suwono	6	5	83%
Santoso	6	5	83%
Vera Eve Lim	6	6	100%
Haryanto T. Budiman	6	6	100%
Frengky Chandra Kusuma	6	5	83%
John Kosasih	6	6	100%
Antonius Widodo Mulyono	6	5	83%

Joint Meetings Schedule of the Board of Commissioners and the Board of Directors in 2025

BCA has scheduled the following joint meeting of the Board of Commissioners and Board of Directors in 2025:

Month	Date
January	14
April	17
July	10, 28, 29
October	9, 10, 13, 14

The Board of Commissioners and the Board of Directors joint meeting schedule may change at any time as needed.

The plan for the Board of Directors and the Board of commissioners joint meeting schedule for 2025 has been published on the BCA website since December 2024 and can be accessed at: <https://www.bca.co.id/en/tentangbca/tata-kelola/struktur-organisasi>.

15) Internal Fraud Violations Data

Disclosure of deviations (internal fraud) is carried out based on OJK Regulation concerning the Implementation of Governance for Commercial Banks and Chapter IX No. 5 OJK Circular Letter No.13/SEOJK.03/2017 concerning the implementation of governance for commercial banks, whereby the report consists of forms of deviation (internal fraud), namely fraud committed by members of the Board of Directors, members of the Board of Commissioners, permanent employees, temporary employees (honorary), and/or outsourced workers. The disclosed deviation refers to deviations of more than Rp100,000,000.00 (one hundred million rupiah).

Table of Data on Fraud Violations Committed by Management, Permanent and Non-Permanent Employees

Table of Data on Fraud Violations Committed by Management, Permanent, and Non-Permanent Employees

Deviation in 1 year	Member of the Board of Directors and Member of the Board of Commissioners		Permanent Employee		Non-Permanent Employee and Outsourced Workers	
	2024	2023	2024	2023	2024	2023
Total Fraud	-	-	3	2	3	4
Resolved	-	-	1	-	-	-
In the process of being resolved internally at BCA	-	-	2	-	3	-
Yet to be resolved	-	-	-	-	-	-
Has been followed up through the legal process	-	-	-	2	-	4

16) Legal Cases

The legal issues covering criminal cases and civil cases faced by BCA throughout 2024, 2023, and 2022 are as follows.

a) Criminal Law Cases

The following are the details of criminal law cases faced by BCA in 2024, 2023, and 2022:

Criminal Law Cases	2024	2023	2022
Legally settled (a final and binding verdict has been issued)	6	13	6
In the process of settlement	1	4	7
Total	7	17	13

Throughout 2024, these criminal court cases all included allegations against BCA customers,

employees, or other third parties of thievery, fraud, embezzlement in office, embezzlement of fiduciary collateral, fraud, forgery of letters, money counterfeiting, and money-counterfeiting, where no case has a material loss value of more than Rp1 billion..

Meanwhile, there were no criminal cases in court involving reports from customers, employees, or other third parties against BCA.

b) Civil Law Cases

The following are the details of civil law cases faced by BCA in 2024, 2023, and 2022:

Civil Law Cases	2024	2023	2022
Legally settled (a final and binding verdict has been issued)	203	155	160
In the process of settlement	216	219	186
Total	419	374	346

BCA was involved in civil cases as a result of the following:

- 1) Lawsuit related to the account by the customer's heirs.
- 2) Customer lawsuit/resistance related to account confiscation/blocking carried out by BCA at the request of the Court, Tax Office and/or other third parties.
- 3) Lawsuits from customers/other third parties related to payment transactions, transfers, balances, and disbursement of account and/or securities.
- 4) Customer lawsuit related to account fraud.
- 5) Lawsuits related to the use and payment of credit card bills.
- 6) A third-party lawsuit related to land/office building disputes owned by BCA.
- 7) Lawsuits related to legal entity accounts in connection with disputes over the management of legal entities and/or associations.
- 8) BCA lawsuit/resistance related to compensation payment and account blocking.
- 9) Lawsuit/rebuttal from debtors (husband/wife), collateral owners, and/or other parties related to confiscation of execution, auction, and/or emptying of collateral.
- 10) Lawsuit/rebuttal from debtors (husband/wife) and/or third parties related to credit and/or collateral.
- 11) Application of PKPU/Bankruptcy requests submitted by BCA against bad debtors.

Throughout 2024, BCA did not face significant risks regarding existing legal issues because, based on the results of its self-assessment, BCA's legal risk level is in a "low" position.

c) Legal Cases Faced by the Subsidiaries

The following are the details of civil and criminal legal cases that Subsidiaries faced in 2024:

Subsidiaries	Case Status	Civil	Criminal
PT BCA Finance	Legally settled (a final and binding verdict has been issued)	57	-
	In the process of settlement	67	-
BCA Finance Ltd	Legally settled (a final and binding verdict has been issued)	-	-
	In the process of settlement	-	-
PT Bank BCA Syariah	Legally settled (a final and binding verdict has been issued)	15	-
	In the process of settlement	27	1
PT Asuransi Umum BCA	Legally settled (a final and binding verdict has been issued)	-	-
	In the process of settlement	-	-
PT Asuransi Jiwa BCA	Legally settled (a final and binding verdict has been issued)	1	-
	In the process of settlement	4	-
PT BCA Sekuritas	Legally settled (a final and binding verdict has been issued)	-	-
	In the process of settlement	-	-
PT Central Capital Ventura	Legally settled (a final and binding verdict has been issued)	-	-
	In the process of settlement	-	-
PT Bank Digital BCA	Legally settled (a final and binding verdict has been issued)	-	-
	In the process of settlement	-	-
PT BCA Multi Finance	Cases that have been settled (there is a decision that has permanent legal force)	8 ^{*)}	2 ^{*)}
	In the process of settlement	13 ^{*)}	2 ^{*)}

Note:

*) As of September 1, 2024, PT BCA Multi Finance effectively merged into PT BCA Finance

Important Cases & Administrative Sanctions

a) Significant Cases Facing Members of the Board of Directors and Members of the Board of Commissioners of BCA

Throughout 2024, no member of the Board of Directors or members of the Board of Commissioners have never been involved in any significant criminal or civil cases, as member of the Board of Directors or member of the Board of Commissioners of BCA.

b) Significant Cases Facing Members of Board of Directors and Board of Commissioners of Subsidiaries

Throughout 2024, no current members of the Board of Directors or members of the Board of Commissioners of Subsidiaries have ever been involved in any significant criminal or civil cases, as member of the Board of Directors or member of the Board of Commissioners of Subsidiaries.

Impact of Legal Issues on BCA and Subsidiaries

All legal issues encountered by BCA and its Subsidiaries throughout 2024 have no material impact on BCA's and its Subsidiaries' position or business continuity.

c) Administrative Sanctions from Related Authorities

Throughout 2024, BCA, member of the Board of Directors and/or members of the Board of Commissioners have never received administrative sanctions, both material and non-material, from the OJK or other regulators, which could affect BCA's business continuity.

d) Sanctions for non-compliance with laws or regulations related to significant or material related party transactions

Throughout 2024, there were no cases of noncompliance with laws, rules, and regulations relating to transactions with related parties that are significant or material involving BCA.

e) Sanctions for legal violations related to labor/employment/bankruptcy/competition or environmental issues

Throughout 2024, BCA has never been sanctioned by a court decision that has been legally binding (inkracht) related to labour/employment/insolvency/ competition or environmental issues.

f) Sanctions from regulators related to important events

Throughout 2024, BCA has never received sanctions from regulators due to not making announcements within the specified time period for important events.

g) Sanctions related to listing regulations

Throughout 2024, BCA has not received any sanctions related to violations of listing policies from regulators. BCA always strives to comply with listing rules, regulations, provisions and/or listing policies from regulators and SROs, both disclosure policies and other related policies.

h) Sanctions related to tax regulations

In the last 3 (three) years, there are taxation cases that are still under litigation. The tax cases were not caused by BCA's non-compliance with the applicable tax laws and regulations.

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 is stated in the Board of 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 give rise to 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.

In the context of integrated governance, the Board of Directors of BCA also ensures that the implementation of intra-group transaction risk management within the financial conglomerate is free from conflicts of interest between 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, which govern the following matters among others:

- 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 related to 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 2024, members of the Board of Commissioners and members of the Board of Directors of BCA have managed the potential for conflicts of interest as regulated in the applicable provisions, including if a member of the Board of Commissioners or a member of the Board of Directors has a conflict of interest, then the member of the Board of Commissioners or member of the Board of Directors who has the conflict of interest does not participate in decision-making.

18) SHARES BUYBACK

Buying back shares or bonds is an effort to reduce the number of shares or bonds issued by BCA by buying back the shares or bonds, with payment procedures carried out in accordance with applicable regulations. In 2024, BCA does not buy back BCA shares or bonds.

19) FUNDING SOCIAL ACTIVITIES

BCA continues to innovate to provide effective and relevant solutions to the environmental and social challenges that society is currently facing. This social and environmental responsibility takes place comprehensively under the program Bakti BCA, which focuses on individual and community empowerment, as well as ecosystem conservation.

The Bakti BCA activity program is built around 5 (five) major pillars:

- Bakti Pendidikan
- Bakti Kesehatan
- Desa Bakti BCA
- Bakti Budaya
- Bakti Lingkungan

Aside from these programs, BCA also contributes to social institutions through donations. The complete disclosure of BCA's social activities and the total funding provided for social activities carried out by BCA throughout 2024 is set forth in the separate 2024 BCA Sustainability Report, which is an integral and inseparable part of this Annual Report. The report has been uploaded and can be viewed on the BCA website at www.bca.co.id/en/tentang-bca/keberlanjutan/laporankeberlanjutan.

20) FUNDING POLITICAL ACTIVITIES

BCA has a commitment not to fund any political activities in 2024 or in previous years. BCA did not make any contributions and other related expenditures in 2024:

- Lobbying, interest representation or similar
- Local, regional or national political campaigns/organizations/candidates
- Other (e.g. spending related to ballot measures or referendums)
- Total contributions and other spending

2. Self-Assessment Report Implementation of GCG year 2024 in accordance with The Attachment IV Financial Services Authority Circular Letter Number 13/SEOJK.03/2017 dated 17 March 2017

Name : PT Bank Central Asia Tbk
 Position : December 31, 2024

Self-Assessment Results of the Implementation of Good Corporate Governance Individually

Results of Self-Assessment on the Implementation of Good Corporate Governance year 2024 Individually:

	Rating	Rating Definition
Semester I	1	BCA management has generally implemented very good governance. This result is reflected in the adequate fulfillment of the Governance principles. If there are weaknesses in the application of the principles of Governance, in general, these weaknesses are not significant and can be resolved by normal actions by BCA management.
Semester II	1	BCA management has generally implemented very good governance. This result is reflected in the adequate fulfillment of the Governance principles. If there are weaknesses in the application of the principles of Governance, in general, these weaknesses are not significant and can be resolved by normal actions by BCA management.

Based on the self-assessment analysis of the aspects of governance structure, governance process, and governance outcomes for each of the Good Governance Implementation Assessment Factors, it can be concluded as follows:

1. The governance structure as per all the Governance Implementation Assessment Factors is complete and very adequate.
2. The governance process aspect in all of the GCG Implementation Assessment Factors is effective, supported by very adequate governance structure and infrastructure.
3. The governance outcome aspect in most of the GCG Implementation Assessment Factors is of high quality resulting from an effective governance process supported by very adequate governance structure and infrastructure.

3. Improvement in the quality of governance that has been carried out by BCA throughout 2024

Throughout 2024, BCA made various efforts to improve quality and strengthen the implementation of Good Corporate Governance (GCG) while considering developments in relevant regulations.

2024

- **Development or Improvement**
 - Board of Commissioners Charter
 - Board of Directors Charter
 - Audit Committee Charter
 - Information Technology Steering Committee Charter
 - Ownership Reports or Any Changes in Share Ownership Policy
 - Personal Data Protection Policy
 - Implementation of Affiliated Transactions and Conflict of Interest Transactions Policy
- **Socialization**
 - Create socialization videos for BCA personnel that are broadcast on social media and internal digital publication media regarding capital market supporting institutions
 - Organizing a Group Discussion Forum with Subsidiary Companies regarding:
 1. Calculation of Carbon Emissions for BCA Subsidiary Companies
 2. Affiliated Transactions and Conflicts of Interest
 3. Implementation of Anti-Fraud
 - Instructions for Implementing Affiliated Transactions for all Regional Offices and Head Office Work Units
 - GCG Series, which can be accessed by BCA personnel on the MyBCA Portal (Internal Portal)
- **System Improvement**
 - Affiliate Transaction Reporting System
 - Tax tracking system notifications related to affiliated parties
 - Implementation of GCG, referring to ACGS criteria, namely updating the BCA Corporate Governance section of the website regularly
 - Enhanced digitization of recaps of the Board of Directors' meetings, Board of Commissioners meetings, Committee meetings under the Board of Commissioners and the Board of Directors
 - ESG Ratings Dashboard
 - Creation of an ESG Chatbot, as a solution to facilitate communication with work units.
 - Enhancement i-sign Board Minute of Meetings

Propelled by **Trust**

2024 ANNUAL
REPORT



**PT Bank Central Asia Tbk
Head Office**

Menara BCA, Grand Indonesia
Jl. M.H. Thamrin No. 1
Jakarta 10310, Indonesia

Tel. : (+62 21) 2358 8000
Fax. : (+62 21) 2358 8300

www.bca.co.id



haloBCA
1500-888



haloBCA Apps
Chat & Call
(not free)



Bank BCA
+62-611-1500-998



Email
halobca@bca.co.id



X
@haloBCA