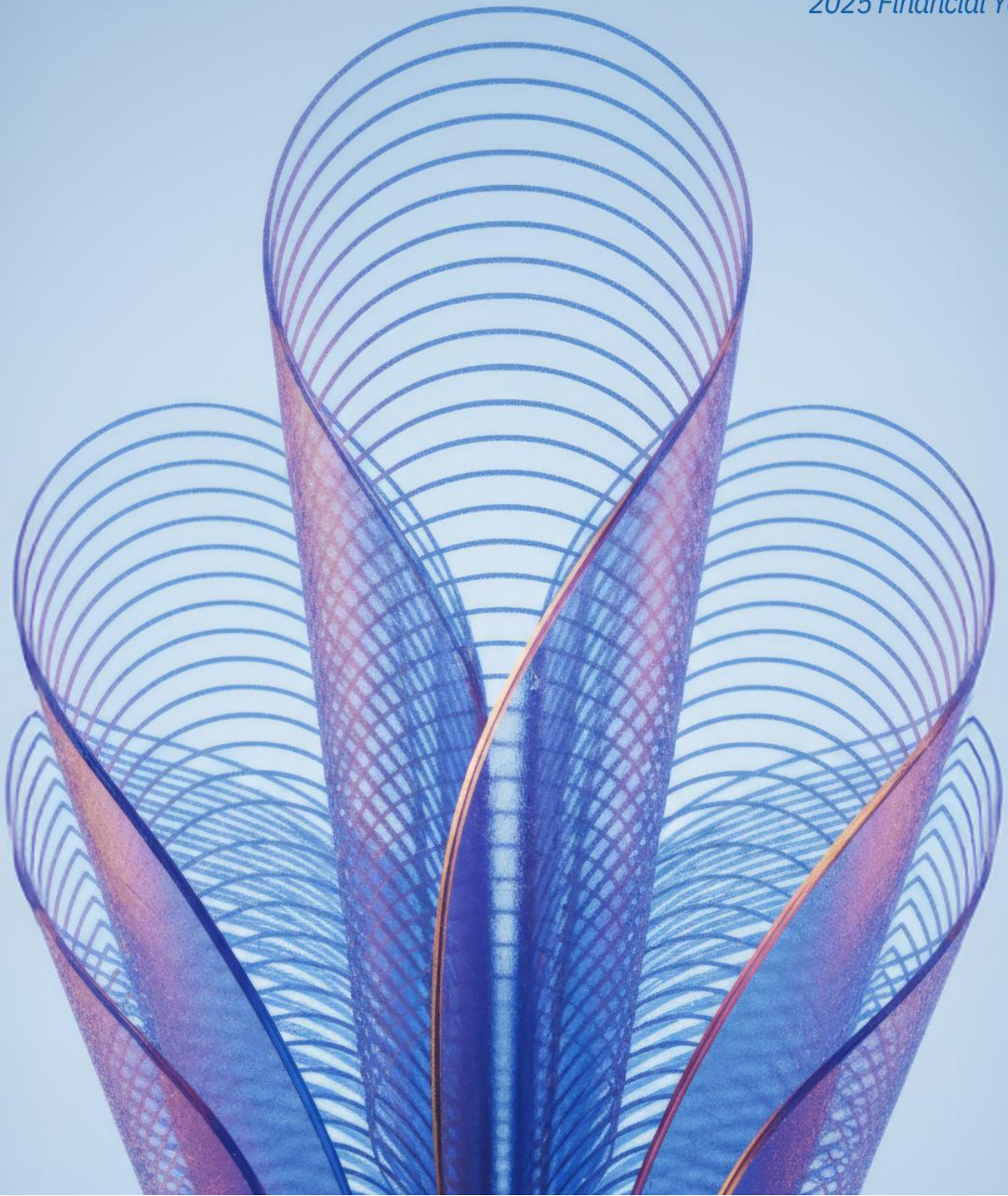




# Integrated Governance Report

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*2025 Financial Year*



**ANNUAL REPORT OF INTEGRATED GOVERNANCE  
IMPLEMENTATION OF THE FINANCIAL CONGLOMERATE PT BANK  
CENTRAL ASIA Tbk  
FINANCIAL YEAR 2025**

PT Bank Central Asia Tbk (“**BCA**”) as the main entity of the BCA Financial Conglomerate is required to prepare and submit an Annual Report of Integrated Governance Implementation to the Otoritas Jasa Keuangan (“**OJK**”).

Annual Report of The Integrated Governance Implementation of The Financial Conglomerate PT BCA year 2025 was prepared in accordance with:

1. OJK Regulation Number 18/POJK.03/2014 regarding Implementation of Integrated Governance for Financial Conglomerates;
2. OJK Regulation Number 17 Year 2023 concerning the Implementation of Governance for Commercial Banks (hereinafter referred as "**OJK Regulation on the Implementation of Governance for Commercial Banks**");
3. OJK Circular Letter Number 15/SEOJK.03/2015 on Implementation of Integrated Governance for Financial Conglomerates; and
4. OJK Circular Letter Number 14/SEOJK.03/2025 concerning Corporate Governance Guidelines for Commercial Banks.

**Table of Content**

Annual Report of The Integrated Governance Implementation of The Financial Conglomerates of BCA financial year 2025 at least consist of:

I. Self-Assessment Report on the Integrated Governance Implementation for Financial Year 2025.....	3
II. Financial Conglomerate Structure as of 31 December 2025.....	4
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 Shareholder .....	4
IV. Management Structure in Main Entity and Financial Services Institution (Subsidiaries) of BCA’s Financial Conglomerate .....	6
V. Intra-Group Transaction Policy .....	8
A. Oversight of the Board of Commissioners and the Board of Directors .....	8
B. Adequacy of Policy, Procedure, and Implementation of Intra-group Transaction Risk Limit .....	9
C. Adequacy of Identification Process, Measurement, Monitoring, and Risk Control and Information System of Intra-Group Transaction Risk Management.....	9
D. Internal Control System Towards the Implementation of Intra-Group Transaction Risk .....	9
VI. Implementation Corporate Governance Report of BCA .....	10
A. Transparency of Good Corporate Governance Implementation of BCA.....	10
B. Self-Assessment Report Implementation of GCG year 2025.....	49

**I. Self Assessment Report on the Integrated Governance Implementation for Financial Year 2025**

In accordance with Articles 44 and 45 of the OJK Regulation on the Implementation of Integrated Corporate Governance, Chapter VIII concerning Reporting, and OJK Circular Letter No. 15/SEOJK.03/2015, BCA as the Main Entity is required to prepare periodic self-assessment reports on Integrated Governance implementation and submit them to OJK.

The Integrated Governance implementation assessment is conducted semi-annually. In 2025, BCA as the Main Entity conducted self-assessments for the first and second semesters. These assessments covered 3 key aspects of Integrated Governance: Structure, Process, and Outcomes.

The Integrated Governance implementation assessment includes at least 7 factors:

1. Implementation of duties and responsibilities by the Board of Directors of the Main Entity;
2. Implementation of duties and responsibilities by the Board of Commissioners of the Main Entity;
3. Duties and responsibilities of the IGC;
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. Formulation and implementation of Integrated Governance Guidelines.

The self-assessment results for Integrated Governance implementation in both the first and second semesters of 2025 achieved “Rank 1” (“Excellent”), with the following details:

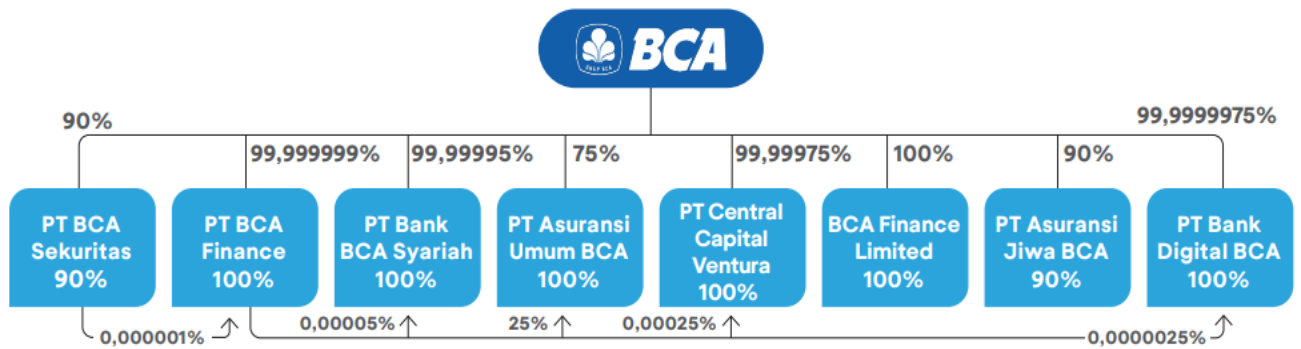
	Rating	Definition of Ranging
Semester I	1	The Financial Conglomerate has implemented Integrated Governance very well in general. This is reflected in the very adequate compliance with the Integrated Governance principle. If there are weaknesses in the implementation of Integrated Governance, these are generally insignificant and can be immediately corrected by the Main Entity and/or Financial Services Institutions.
Semester II	1	The Financial Conglomerate has implemented Integrated Governance very well in general. This is reflected in the very adequate compliance with the Integrated Governance principle. If there are weaknesses in the implementation of Integrated Governance, these are generally insignificant and can be immediately corrected by the Main Entity and/or Financial Services Institutions.

**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.

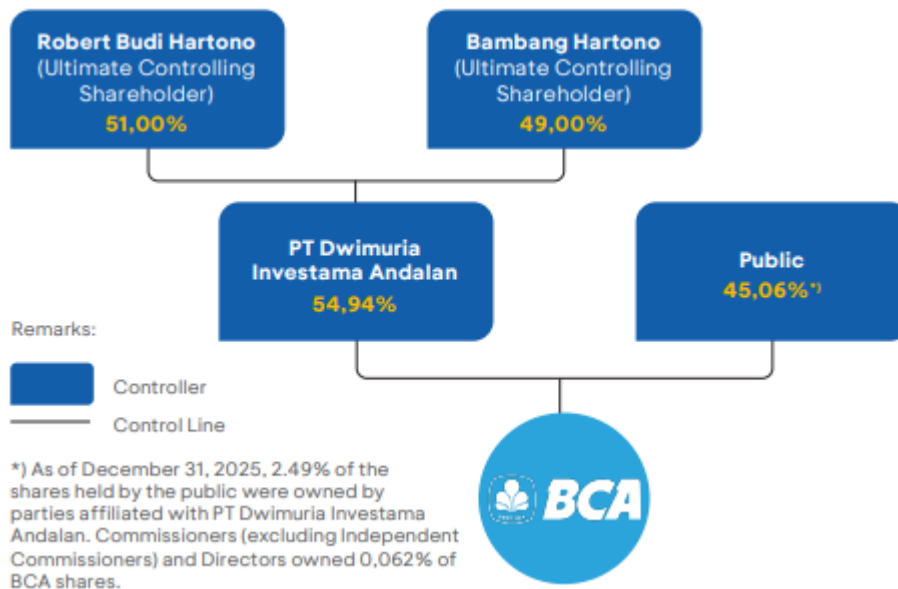
## II. BCA Financial Conglomerate Structure as of 31 December 2025



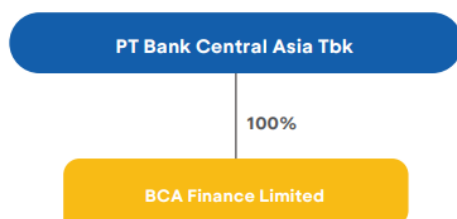
Note: BCA Finance Limited was liquidated on January 3, 2026 and is therefore no longer part of the BCA Financial Conglomerate Structure.

## 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 Shareholder

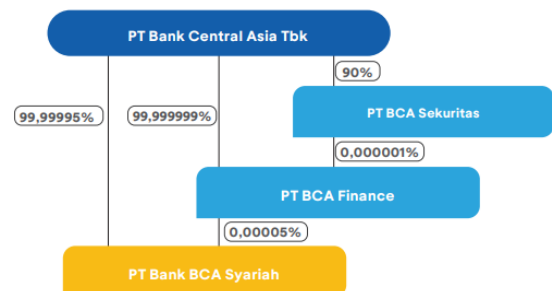
As of December 31, 2025, the share ownership structure of the BCA Financial Conglomerate is as follows:



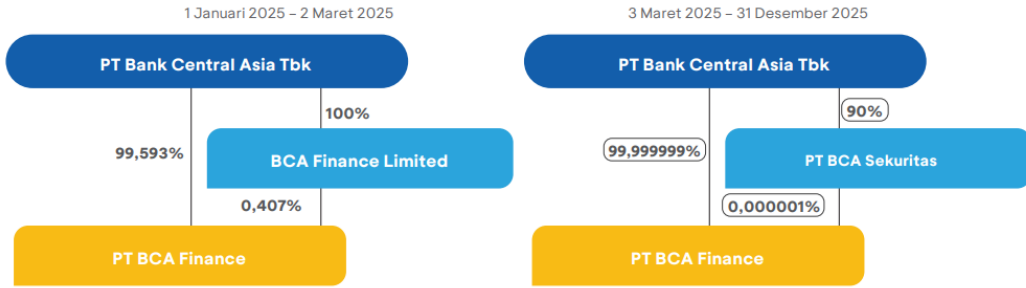
### Share Ownership Structure of BCA Finance Limited



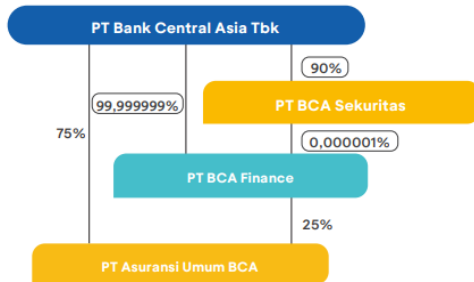
### Share Ownership Structure of PT Bank BCA Syariah



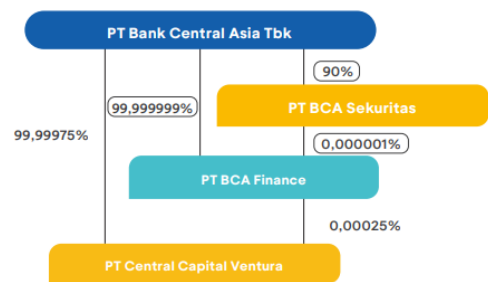
## Share Ownership Structure of PT BCA Finance



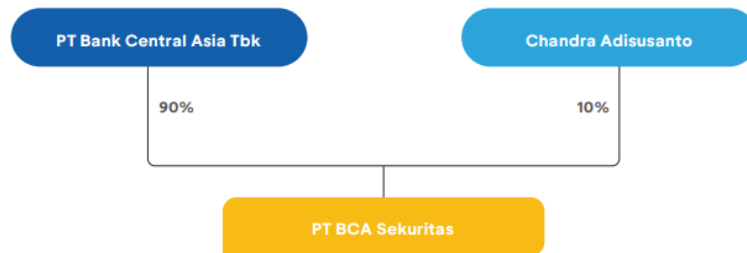
## Share Ownership Structure of PT Asuransi Umum BCA



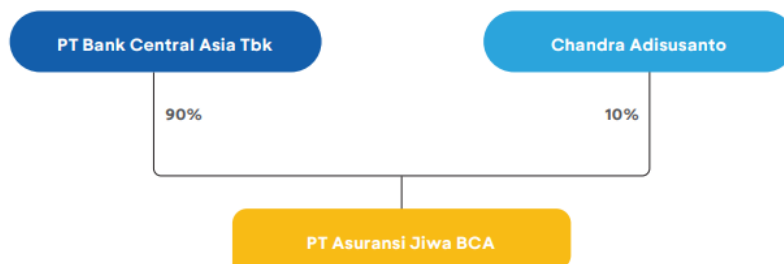
## Share Ownership Structure of PT Central Capital Ventura



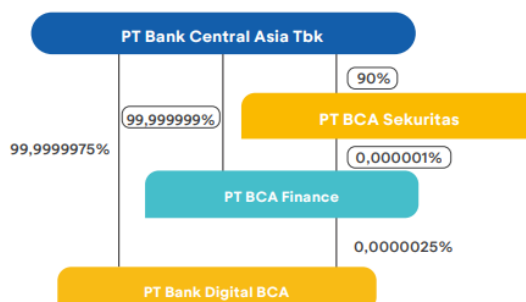
## Share Ownership Structure of PT BCA Sekuritas



## Share Ownership Structure of PT Asuransi Jiwa BCA



## Share Ownership Structure of PT Bank Digital BCA



#### IV. Management Structure in Main Entity and Financial Services Institution (Subsidiaries) of Bca's Financial Conglomerate

##### Management Structure of BCA (Main Entity)

###### BOARD OF COMMISSIONERS

Position	Name
President Commissioner	Djohan Emir Setijoso <sup>1)</sup>
President Commissioner	Jahja Setiaatmadja <sup>2)</sup>
Commissioner	Tonny Kusnadi
Independent Commissioner	Cyrillus Harinowo
Independent Commissioner	Raden Pardede
Independent Commissioner	Sumantri Slamet

Note:  
 1) Resigned from his position as President Commissioner effective June 1, 2025.  
 2) Term as President Director ends effective 1 June 2025 and effectively assumed his position as President Commissioner on June 1, 2025.

###### BOARD OF DIRECTORS

Position	Name
President Director	Jahja Setiaatmadja <sup>1)</sup>
President Director	Gregory Hendra Lembong <sup>2)</sup>
Deputy President Director 1	John Kosasih <sup>3)</sup>
Deputy President Director 2	Armand Wahyudi Hartono
Director	Tan Ho Hien/Subur atau Subur Tan
Director	Rudy Susanto
Director (concurrently serves as Director in charge of the Compliance Function)	Lianawaty Suwono
Director	Santoso
Director	Vera Eve Lim
Director	Haryanto T. Budiman
Director	Frengky Chandra Kusuma
Director	Antonius Widodo Mulyono
Director	Hendra Tanumihardja <sup>4)</sup>

Note:  
 1) Term as President Director ends effective 1 June 2025, and effectively assumed his position as President Commissioner on June 1, 2025.  
 2) Previously served as Deputy President Director, effective as President Director as of June 1, 2025.  
 3) Previously served as Director, effective as Deputy President Director as of June 1, 2025.  
 4) Effective since June 1, 2025.

##### Management Structure of BCA Finance Limited\*)

###### DIRECTORS

Position	Name
Director	Andy Kwok Sau Lai
Director	Fanny Surjadi
Director	Janto Havianto

\*) BCA Finance Limited was liquidated on January 3, 2026 and is therefore no longer part of the BCA Financial Conglomerate Structure.

##### Management Structure of PT BCA Finance

###### BOARD OF COMMISSIONERS

###### BOARD OF DIRECTORS

Position	Name	Position	Name
President Commissioner	Suwigno Budiman <sup>1)</sup>	President Director	Roni Haslim <sup>2)</sup>
President Commissioner	Roni Haslim <sup>3)</sup>	President Director	Petrus Santoso Karim <sup>4)</sup>

concurrently serves as Independent Commissioner			
Commissioner	David Hamdan	Director	Lim Handoyo
Independent Commissioner	Sulistiyowati	Director	Sugito Lie
		Director	Liston Nainggolan
		Director	Tan, Widy Tarmizi
		Director	Herwandi Kuswanto
		Director	Hendrik Sia, ST, MM <sup>5)</sup>
<p>1) Served until March 7, 2025.  2) Served until May 26, 2025.  3) Effective as of November 1, 2025.  4) Previously served as Director, effective as President Director as of May 26, 2025.  5) Effective served as Director as of August 1, 2025.</p>			

## Management Structure of PT Bank BCA Syariah

### BOARD OF COMMISSIONERS

### BOARD OF DIRECTORS

Position	Name	Position	Name
Independent President Commissioner	Ratna Yanti	President Director	Yuli Melati Suryaningrum
Commissioner	Rickyadi Widjaja	Director in Charge of Compliance	Houda Muljanti <sup>1)</sup>
Independent Commissioner	Inge Setiawati	Director in Charge of Compliance	Eduard Guntoro Purba <sup>2)</sup>
		Director	Pranata
		Director	Lukman Hadiwijaya
		Director	Ina Widjaja
<p>1) served until March 4, 2025.  2) effectively served since March 4, 2025</p>			

## Sharia Supervisory Board

Position	Name
Chairman	Prof. DR. H. Fathurrahman Djamil, MA
Member	Sutedjo Prihatono
Member	Nenny Kurnia Noersal <sup>1)</sup>
1) effective 4 March 4, 2025	

## Management Structure of PT Asuransi Umum BCA

### 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

## 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

### BOARD OF COMMISSIONERS

### BOARD OF DIRECTORS

Position	Name	Position	Nama
President Commissioner	Dharwin Yuwono	President Director	Mardi Henko Sutanto
Independent Commissioner	Ir. Hendra Iskandar Lubis	Director	Imelda Arismunandar
		Director	Ughary Yovvy Chandra <sup>1)</sup>

1) Effective since December 23, 2025

## Management Structure PT Asuransi Jiwa BCA

### BOARD OF COMMISSIONERS

### BOARD OF DIRECTORS

Position	Name	Position	Name
President Commissioner	Hariyanto <sup>1)</sup>	President Director	Christina Wahjuni Setyabudhi <sup>1)</sup>
President Commissioner	Christina Wahjuni Setyabudhi <sup>2)</sup>	President Director	Eva Agrayani, Tjong <sup>3)</sup>
Commissioner	Mathilda Simon	Director	Yannes Chandra
Independent Commissioner	Pudjianto	Director of Compliance	Sukawati Lubis
Independent Commissioner	Hardjono	Director	Gunawan Prayogo <sup>2)</sup>

1) Served until February 28, 2025  
 2) Effective as of February 28, 2025  
 3) Previously served as Director, effectively served as President Director since February 28, 2025

## Management Structure of PT Bank Digital BCA

### BOARD OF COMMISSIONERS

### BOARD OF DIRECTORS

Position	Name	Position	Name
President Commissioner	Theresia Endang Ratnawati <sup>1)</sup>	President Director	Lanny Budiati
President Commissioner	Grace Putri Aju Dewijany <sup>2)</sup>	Director	Iman Sentosa <sup>3)</sup>
Independent Commissioner	Ina Suwandi	Director	Nico Lukman <sup>4)</sup>
Independent Commissioner	Daniel Gunawan	Director of Compliance	Nugroho Budiman

1) Served until October 1, 2025  
 2) Effective as of October 1, 2025.  
 3) Served until July 1, 2025  
 4) Effective as of July 1, 2025.

## V. Intra-Grup Transaction Policy

### A. Oversight of the Board of Commissioners and the Board of Directors as Main Entity

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.

1. Authority and responsibilities of the Board of Commissioners include:
  - a. approving the intra-group transaction risk management policy,

- b. evaluating the accountability of the Board of Directors and providing directions for improvement regarding the implementation of the policy.
- 2. Authority and responsibilities of the Board of Directors include:
  - a. understanding the inherent intra-group transaction risks within the Financial Conglomerate;
  - b. formulating and establishing the intra-group transaction risk management policy;
  - c. assuming responsibility for the implementation of the policy;
  - d. ensuring every entity within the Financial Conglomerate implements intra-group transaction risk management;
  - e. monitoring intra-group transaction risks periodically;
  - f. developing a risk culture as part of risk management; and
  - g. ensuring the implementation of intra-group transaction risk management is free from conflicts of interest between the Financial Conglomerate and individual FSIs.

**B. Adequacy of Policy, Procedure, and Implementation of Intra-group Transaction Risk Limit**

The establishment of policies, procedures, and limits for intra-group transaction risk considers the following:

- 1. The Financial Conglomerate must ensure compliance with the arm's length principle (fairness of transactions) for all intra-group transactions;
- 2. Risk appetite and risk tolerance must align with the business strategy, risk profile, and capital plan of the Financial Conglomerate;
- 3. Policies and limits for intra-group transactions must comply with regulatory requirements;
- 4. Risk management procedures must include, at minimum:
  - a. Clear accountability and levels of delegated authority;
  - b. Periodic reviews of procedures;
  - c. Adequate documentation that is written, complete, and facilitates an audit trail.

**C. Adequacy of Identification Process, Measurement, Monitoring, and Risk Control and Information System of Intra-Group Transaction Risk Management**

BCA, as the Main Entity, is required to perform an integrated process of identification, measurement, monitoring, and control of all significant risk factors, taking into account:

- 1. the composition of intra-group transactions within the Financial Conglomerate;
- 2. documentation and the fairness of transactions;
- 3. compliance with legal and regulatory requirements;
- 4. other significant information.

This implementation is supported by a risk management information system including intra-group transaction risk profile reports, which are part of the Integrated Risk Profile Report.

**D. Internal Control System Towards the Implementation of Intra-Group Transaction Risk**

The implementation process of effective intragroup transaction risk management must be supported by a comprehensive internal control system.

BCA is required to implement an effective internal control system for intra-group transaction risk with the following provisions:

- 1. Refers to established policies and procedures.
- 2. The internal control system is structured to ensure:
  - a. Compliance with internal policies or provisions as well as prevailing laws and regulations.
  - b. The effectiveness of the overall risk culture within the Financial Conglomerate to identify weaknesses and deviations at an early stage and to continuously reassess the fairness and adequacy of the Financial Conglomerate's existing policies and procedures.
- 3. Review of intra-group transaction risk measurement, which at least includes:
  - a. The alignment of policies, organization structure, resource allocation, intra-group transaction risk management process design, information systems, and risk reporting with the business needs of the Financial Conglomerate, as well as regulatory developments and best practices related to intra-group transaction risk management.
  - b. Complete and adequate documentation of the scope, operational procedures, audit findings, and the responses of the Financial Conglomerate's management based on audit results.

## VI. Implementation Corporate Governance Report of BCA

### A. Transparency of Good Corporate Governance Implementation of BCA

#### 1. Directors

##### a. Number, Composition, Criteria, and Independence of Members of the Board of Directors

###### Number dan Composition

BCA has complied with the provisions regarding the number and composition of the Board of Directors' members pursuant to OJK Regulation on the Implementation of Corporate Governance for Commercial Banks.

OJK Regulation Provisionson the Implementation of Corporate Governance for Commercial Banks	Implementation at BCA
Banks are required to have a Board of Directors with a minimum of 3 members.	BCA has 12 members of the Board of Directors.
All members of the Board of Directors must be domiciled in Indonesia.	All members of the Board of Directors are domiciled in Indonesia.
The Board of Directors must be led by a President Director or Managing Director.	BCA Board of Directors is led by a President Director.

As of December 31, 2025, BCA's Board of Directors consists of 12 members, comprising:

- 1 President Director who is independent from the Controlling Shareholder;
- 2 Deputy President Directors;
- 1 Director responsible for compliance; and
- 8 Directors.

###### Criteria

BCA Board of Directors' members are individuals meeting the criteria and requirements pursuant to OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, OJK Regulation on the Implementation of Corporate Governance for Commercial Banks including its implementing regulations, and OJK Regulation No. 27/POJK.03/2016 concerning Fit and Proper Tests for Main Parties of Financial Services Institutions. Criteria for Board members are also available in the Board of Directors Charter, accessible to the public via the BCA website under the Organization Structure section (<https://www.bca.co.id/en/tentang-bca/tatakelola/Struktur-Organisasi#>).

The criteria for BCA Board of Directors' members are as follows:

1) having integrity, including:

- a) having good character, morals, and integrity;
- b) being capable of performing legal acts;
- c) maintaining a commitment to comply with laws and regulations;
- d) maintaining a commitment toward sound banking development;

2) having competencies, including:

- a) having knowledge and/or expertise in fields required by BCA, such as:
  - (1) adequate banking knowledge relevant to the position. Banking knowledge includes understanding bank regulations and operations, as well as risk management;
  - (2) knowledge regarding the duties and responsibilities of the Main Entity and understanding the primary business activities and key risks of Financial Services Institutions within a financial conglomeration;
  - (3) experience in banking and/or finance, including operations, marketing, accounting, audit, funding, credit, money markets, capital markets, law, or supervisory experience within Financial Services Institutions;
  - (4) the ability to perform strategic management for sound bank development;
  - (5) having at least 5 years of operational experience, at a minimum level as a Bank Executive Officer;
- b) performing strategic management for sound bank development, including:
  - (1) being competitive and visionary, demonstrated by a commitment to long-term performance;
  - (2) maintaining an ethical and responsible attitude in conducting bank business,

- operations, and services;
- (3) contributing to society and the environment; and
- (4) having the ability to adapt, survive, and grow;
- 3) having good reputation, including:
  - a) having no non-performing loans and/or financing;
  - b) within 5 years prior to appointment and during the term of office:
    - (1) never having been declared bankrupt;
    - (2) never having served as a member of a Board of Directors and/or Board of Commissioners found guilty of causing a company's bankruptcy;
    - (3) never having served as a member of a Board of Directors and/or Board of Commissioners who:
      - (a) failed to convene an annual GMS;
      - (b) had their accountability as a Board member rejected by the GMS or failed to provide such accountability to the GMS; and
      - (c) caused a company licensed, approved, or registered by OJK to fail in its obligation to submit annual reports and/or financial statements to OJK.
  - c) never having been convicted of a criminal offense within a certain period prior to nomination. "Criminal offense" refers to:
    - (1) a criminal offense in the financial services sector with the sentence completed within the last 20 years prior to nomination;
    - (2) a felony, specifically a criminal offense listed in the Criminal Code (KUHP) and/or similar foreign criminal codes carrying a prison sentence of 1 year or more, with the sentence completed within the last 10 years prior to nomination; and/or
    - (3) other criminal offenses carrying a prison sentence of 1 year or more, including corruption, money laundering, narcotics/ psychotropics, smuggling, customs, excise, human trafficking, illicit arms trafficking, terrorism, counterfeiting, tax offenses, forestry offenses, environmental offenses, and marine and fisheries offenses, with the sentence completed within the last 20 years prior to nomination;
  - d) maintaining BCA's reputation;
    - (1) not being classified as a party prohibited from becoming a Main Party, including the candidate's absence from the Disqualified List (DTL) resulting from a Fit and Proper Test pursuant to regulations concerning Fit and Proper Tests for Main Parties, including Controlling Shareholders, members of the Board of Directors, and members of the Board of Commissioners; and
    - (2) having a commitment to refrain from committing and/or repeating acts and/or actions causing the individual to be classified as a party prohibited from becoming a Main Party.

#### **Independence of Members of the Board of Directors**

In connection with the implementation of Article 107 of OJK Regulation on the Implementation of Corporate Governance for Commercial Banks and OJK Circular Letter No. 14/SEOJK.03/2025 concerning the Implementation of Good Corporate Governance for Commercial Banks, BCA shareholders also have a role in supporting the implementation of sound business activities and maintaining BCA's business continuity. BCA considers the interests and rights of shareholders, including the protection of minority shareholders.

#### **b. Duties and Responsibilities of the Board of Directors**

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

- 1) The Board of Directors is fully responsible for the management of BCA for the interests and objectives of BCA. The main duties of the Board of Directors are:
  - a) leading and managing BCA in accordance with the purposes and objectives of BCA;
  - b) controlling, maintaining, and managing BCA's assets for the benefit of BCA;
  - c) establishing internal control structures, ensuring the implementation of BCA's Internal Audit function at every management level, and following up on findings from the BCA Internal Audit Division (DAI) pursuant to policies or directives provided by the Board of Commissioners.
- 2) Each member of the Board of Directors is required to carry out their duties in good faith

- and with full responsibility, adhering to the applicable laws and regulations;
- 3) The Board of Directors represents BCA in and out of court regarding all matters and events, binds BCA with other parties and vice versa, and implements all actions concerning both management and ownership; however, subject to the restriction requiring the Board of Directors to obtain prior written approval from the Board of Commissioners for the following actions:
    - a) Lending money or providing credit facilities or other banking facilities resembling or resulting in the incurrence of loans:
      - (1) to related parties as stipulated in Bank Indonesia regulations concerning the Maximum Lending Limit for Commercial Banks;
      - (2) exceeding a certain amount to be determined from time to time by the Board of Commissioners.
    - b) Providing guarantees or debt guarantees (*borgtocht*):
      - (1) to guarantee the payment obligations of related parties to other parties as stipulated in the provisions of Bank Indonesia or the OJK or other authorized agencies concerning the Maximum Lending Limit for Commercial Banks;
      - (2) to guarantee the obligations of other parties for amounts exceeding a certain amount to be determined from time to time by the Board of Commissioners.
    - c) Purchasing or otherwise acquiring immovable property, except in the context of carrying out other activities normally carried out by BCA, provided this does not conflict with applicable laws and regulations, including, among others, actions for credit restructuring or rescue, such as purchasing collateral, either in whole or in part, through auction or other means, in the event the debtor fails to fulfill its obligations to BCA, provided the purchased collateral must be immediately disbursed, in excess of a certain amount to be determined from time to time by the Board of Commissioners.
    - d) Establishing new companies, making, divesting, reducing, or increasing capital participation, except:
      - (1) increasing capital participation originating from the Company's stock dividends; or
      - (2) equity participation for the purpose of credit rescue;
      - (3) while still observing applicable laws and regulations.
    - e) Borrowing money, excluding activities involving the collection of public funds in the form of deposits such as current accounts, time deposits, certificates of deposit, savings, and/or other equivalent forms, in amounts to be determined periodically by the Board of Commissioners;
    - f) Transferring or relinquishing BCA's written-off receivables, whether in part or in full, in amounts to be determined periodically by the Board of Commissioners;
    - g) Selling, transferring, relinquishing rights, or pledging/encumbering BCA assets above a specific value determined periodically by the Board of Commissioners but valued at less than or equal to  $\frac{1}{2}$  (one-half) of BCA's net assets as recorded in the BCA balance sheet, whether in a single transaction or several independent or inter-related transactions within 1 fiscal year;
    - h) Performing legal acts or strategic transactions with the potential for significant impact on BCA's business continuity, with such types of legal acts or transactions determined periodically by the Board of Commissioners;
    - i) Board of Commissioners' approval for such actions by the Board of Directors may be granted for one or more actions and remains subject to periodic review, without prejudice to applicable regulations.
  - 4) To perform any of the following actions:
    - a) Transferring, relinquishing rights, and/or pledging as debt collateral assets amounting to more than  $\frac{1}{2}$  (one-half) of BCA's net assets, whether in a single transaction or several independent or inter-related transactions within 1 fiscal year, except for:
      - (1) the implementation of BCA's business activities; or
      - (2) the implementation of one or several Recovery Options from the Action Plan already approved by the General Meeting of Shareholders, provided the implementation of such Recovery Options remains subject to mandatory approval from the Board of Commissioners;
    - b) Filing applications to the competent authorities regarding BCA's bankruptcy or

applications for a suspension of debt payment obligations (*surseance van betaling*); The Board of Directors must obtain prior approval from the GMS attended by BCA shareholders and/or their authorized proxies representing at least  $\frac{3}{4}$  (three-quarters) of the total shares with valid voting rights issued by BCA, with the proposed motion approved by more than  $\frac{3}{4}$  (three-quarters) of the total votes validly cast during the meeting.

- 5) In the event:
  - a) A member of the Board of Directors are not authorized to represent BCA due to a matter or transaction involving a conflict of interest between the concerned member and BCA, another member of the Board of Directors must represent BCA (without prejudice to the provisions in the BCA Articles of Association);
  - b) All members of the Board of Directors have interests conflicting with BCA's interests, the Board of Commissioners of BCA holds the right to act for, on behalf of, and to represent BCA;
  - c) The provisions in items a) and b) above do not prejudice the provisions regarding "Transactions containing Conflicts of Interest" as recorded in the BCA Articles of Association.
- 6) Without reducing its responsibility, the Board of Directors holds the right to appoint one or more persons as proxies for specific acts, with the authority and conditions determined by the Board within a special power of attorney.
- 7) In connection with the primary duties described above, the Board of Directors must, among others:
  - a) Endeavor and ensure the implementation of BCA's business and activities in accordance with BCA's objectives and line of business;
  - b) Prepare BCA's development plan, work plan, and annual budget, including other plans relating to BCA's business implementation, and submit them to the Board of Commissioners;
  - c) Establish and maintain BCA's bookkeeping and administration in accordance with the prevailing corporate practices;
  - d) Design an accounting system based on internal control principles, particularly the separation of management, recording, storage, and supervisory functions;
  - e) Provide accountability and all information regarding BCA's status and progress, in the form of BCA activity reports, including financial reports, whether as annual reports or other periodic reports, in the manner and time specified in the BCA Articles of Association whenever requested by the Board of Commissioners;
  - f) Prepare BCA's organization structure complete with detailed duties;
  - g) Fulfill other obligations in accordance with the BCA Articles of Association or based on instructions from the Board of Commissioners Meeting or the GMS.
- 8) Other Obligations:
  - a) Implementing GCG principles in all BCA business activities across all levels of the organizational hierarchy;
  - b) Developing an internal control framework to identify, measure, monitor, and control all risks faced by BCA;
  - c) Following upon audit findings and recommendations from BCA's Internal Audit Division (DAI), External Auditors, and supervision results from BI, OJK, and/or other authorities;
  - d) Establishing an Internal Audit Division independent of operational work units and implementing the internal audit function effectively pursuant to applicable regulations;
  - e) Forming the Risk Management Unit, the Risk Management Committee, and the Compliance Unit;
  - f) Submitting the Annual Work Plan—incorporating BCA's Annual Budget—to the Board of Commissioners for approval prior to the start of the upcoming fiscal year, while observing Capital Market laws and regulations;
  - g) Submitting BCA Financial Statements to the Public Accountant for audit;
  - h) Disclosing strategic personnel policies to employees, including various human resources policies within Decisions and circulars accessible to all staff, as well as through the Collective Labor Agreement (CLA) book, the BCA website, and policies

regarding Recruitment, Promotion, and Remuneration systems. Such disclosure must utilize means easily known or accessed by employees;

- i) Providing accurate, relevant, and timely data and information to the Board of Commissioners;
- j) Appointing members of Committees Supporting the Board of Directors based on Board meeting resolutions;
- k) Convening the Annual GMS and/or other/ Extraordinary GMS according to BCA's needs and applicable provisions;
- l) Presenting accountability for the management of BCA during the year to the GMS no later than 6 months after the closing of the fiscal year;
- m) Submitting reports and information disclosures to OJK, the Indonesia Stock Exchange, and other competent authorities in accordance with the applicable laws and regulations.

**c. Share Ownership of the Board of Directors Members Reaching 5% or More of Paid-In Capital**

BCA's policy regarding reporting share ownership of the Board of Directors members refers to Article 57 of OJK Regulation on the Implementation of Corporate Governance for Commercial Banks, OJK Circular Letter No. 14/SEOJK.03/2025 concerning the Implementation of Governance for Commercial Banks, OJK Regulation No. 4 of 2024 and OJK Circular Letter No. 10/SEOJK.04/2025 concerning Reports on Ownership or Changes in Share Ownership of Public Companies, and Reports on Activities of Pledged Shares of Public Companies.

Implementation of the Ownership Reporting Policy or Any Changes in Share Ownership the Board of Directors' Charter stipulates, among others:

- 1) The Board of Directors' obligation to disclose share ownership of 5% or more of paid-up capital, including the type and number of shares in BCA, other banks, non-bank financial institutions, and other companies domiciled domestically and internationally. In addition, BCA has also established and maintained a Special Register as stipulated in Article 50 of Law No. 40 of 2007 concerning Limited Liability Companies.
- 2) The obligation of members of the Board of Directors to submit information to BCA regarding ownership and changes in BCA shares within a maximum of 3 business days after the occurrence of ownership or any change in ownership of shares in a Public Company. The policy for reporting ownership or any changes in share ownership by the Board of Directors complies with OJK Regulation No. 4 of 2024 and OJK Circular Letter No. 10/SEOJK.04/2025 concerning Reports of Ownership or Any Changes in Share Ownership of Public Companies and Reports of Pledged Shares of Public Companies, and has been disseminated through Memorandum No. 0075/MO/ESG/2024 dated August 06, 2024, by the Corporate Secretary to all Directors and the Board of Commissioners.

BCA has also submitted a report on the Board of Directors' share ownership at the beginning of each month and on any changes in the Board of Directors' share ownership in 2025 to OJK and the Indonesia Stock Exchange (IDX) through the e-reporting system, demonstrating BCA's transparency and compliance with internal and external policies regarding share ownership reporting.

**Table of Share Ownership of the Board of Directors' Members Representing 5% or More of Paid-in Capital as of December 31, 2025**

Name	Share ownership of the Board of Directors' Members amounting to 5% or more in:			
	BCA	Other Banks	Non-Bank Financial Institutions	Other Companies
Jahja Setiaatmadja <sup>1)</sup>	-	-	-	✓
Gregory Hendra Lembong <sup>2)</sup>	-	-	-	✓
John Kosasih <sup>3)</sup>	-	-	-	-

Armand Wahyudi Hartono	-	-	-	✓
Tan Ho Hien/Subur/Subur Tan	-	-	-	-
Rudy Susanto	-	-	-	-
Lianawaty Suwono	-	-	-	-
Santoso	-	-	-	-
Vera Eve Lim	-	-	-	-
Haryanto T. Budiman	-	-	-	-
Frengky Chandra Kusuma	-	-	-	-
Antonius Widodo Mulyono	-	-	-	-
Hendra Tanumihardja <sup>4)</sup>	-	-	-	-

Notes:

1) Term as President Director ends effective June 1, 2025, and effectively assumed his position as President Commissioner on June 1, 2025.

2) Effectively served as President Director since June 1, 2025.

3) Effectively served as Deputy President Director since June 1, 2025.

4) Effectively served as Director since June 1, 2025.

✓ Owns shares amounting to 5% or more.

#### d. Financial and Family Affiliation of Board of Directors' Members

Name	Position	Family Affiliation with:								Financial Affiliation with:							
		Board of Commissioners		Board of Directors		Controlling Shareholder		Ultimate Controlling Shareholder		Board of Commissioners		Board of Directors		Controlling Shareholder		Ultimate Controlling Shareholder	
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Gregory Hendra Lembong	President Director	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
John Kosasih	Deputy President Director	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Armand Wahyudi Hartono	Deputy President Director	-	✓	-	✓	-	✓	✓	-	-	✓	-	✓	-	✓	✓	-
Tan Ho Hien/Subur/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	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Antonius Widodo Mulyono	Director	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Hendra Tanumihardja	Director	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓

#### e. Board of Directors Meeting

Name	Total Attendance*)	Total Meetings	Attendance Percentage
Jahja Setiaatmadja <sup>1)</sup>	17	20	85%
Gregory Hendra Lembong <sup>2)</sup>	47	53	89%

John Kosasih <sup>3)</sup>	50	53	94%
Armand Wahyudi Hartono	50	53	89%
Tan Ho Hien/Subur/Subur Tan	50	53	94%
Rudy Susanto	46	53	87%
Lianawaty Suwono	49	53	92%
Santoso	50	53	94%
Vera Eve Lim	49	53	92%
Haryanto T. Budiman	44	53	83%
Frengky Chandra Kusuma	51	53	96%
Antonius Widodo Mulyono	47	53	89%
Hendra Tanumihardja <sup>4)</sup>	33	33	100%
Note: 1) Term as President Director ends effective June 1, 2025, and effectively assumed his position as President Commissioner on June 1, 2025. 2) Effectively served as President Director since June 1, 2025. 3) Effectively served as Deputy President Director since June 1, 2025. 4) Effectively served as Director since June 1, 2025. *) Attended in person or via teleconference			

## 2. Board of Commissioners

### a. Number, Composition, Criteria, and Independence of Members of the Board of Commissioners

#### Number and Composition

BCA has determined the number and composition of the Board of Commissioners' members in accordance with the Board of Commissioners Charter.

OJK Regulation Provisions on the Implementation of Governance for Commercial Banks	Implementation at BCA
Have at least 3 members on the Board of Commissioners and a maximum of the same number of members on the Board of Directors.	The Board of Commissioners consists of 5 members.
Have at least 1 member of the Board of Commissioners domiciled in Indonesia.	All members of the BCA Board of Commissioners are domiciled in Indonesia.
Have Independent Commissioners representing at least 50% of the total number of members on the Board of Commissioners.	Total number of BCA Independent Commissioners is 3 people or 60% of the total number of the BCA Board of Commissioners' members.

#### Criteria

Members of the BCA Board of Commissioners are individuals who meet the criteria and requirements, including those set out in the Board of Commissioners Charter, which is available for download from the Organization Structure section of the BCA website <https://www.bca.co.id/en/tentang-bca/tata-kelola/struktur-organisasi>.

Criteria for members of the BCA Board of Commissioners include the following:

- 1) possess integrity, including:
  - a) possess good morals, ethics, and integrity;
  - b) be competent to perform legal acts;
  - c) have a commitment to comply with laws and regulations and support OJK policies;
  - d) have a commitment to the development of sound banking;
- 2) possess competencies, including:
  - a) Adequate banking knowledge relevant to their position;
  - b) Experience in banking and/or finance;
  - c) Possess knowledge and/or expertise in areas required by BCA;
- 3) possess a good reputation, including:
  - a) having no record of non-performing loans and/ or non-performing financing;
  - b) in 5 years prior to appointment and during their term of office:
    - (1) never been declared bankrupt;

- (2) never having served as a shareholder, non-shareholder Insurance Company Controller, member of the Board of Directors or member of Board of Commissioners member found liable for a company's bankruptcy within 5 years prior to nomination;
- (3) never been a member of the Board of Directors and/or Board of Commissioners who, during their term of office:
  - (a) has failed to hold an Annual General Meeting of Shareholders;
  - (b) has failed to fulfill their accountability as a member of the Board of Directors and/ or Board of Commissioners at a General Meeting of Shareholders or has failed to provide accountability as a member of the Board of Directors and/or Board of Commissioners to a General Meeting of Shareholders; and
  - (c) has caused a company holding a permit, approval, or registration from OJK to fail in its obligation to submit annual reports and/or financial statements to OJK;
- c) have never been convicted of a criminal offense within a certain period prior to their nomination. The term "criminal offense" refers to:
  - (1) a criminal offense in the financial services sector for which the sentence has been completed within the 20 years prior to nomination;
  - (2) a felony, namely a crime listed in the Criminal Code (KUHP) and/or a similar KUHP abroad, punishable by imprisonment of 1 year or more, for which the sentence has been completed within the 10 years prior to nomination; and/or
  - (3) other crimes punishable by imprisonment of 1 year or more, including corruption, money laundering, narcotics/psychotropic substances, smuggling, customs, excise, human trafficking, illicit arms trafficking, terrorism, counterfeiting, taxation, forestry, environmental, maritime, and fisheries offenses, for which the sentence has been completed within the 20 years prior to nomination;
- d) maintaining BCA's reputation;
  - (1) does not fall under the category of parties prohibited from becoming a Principal Party;
  - (2) has passed the Fit and Proper Test in accordance with OJK regulations; and
  - (3) has a commitment to not commit and/or repeat any acts and/or actions resulting in inclusion as a party prohibited from becoming a Main Party.

#### **Independence of Members of the Board of Commissioners**

- 1) The Board of Commissioners' members are all independent from BCA's controlling shareholders.
- 2) The majority of the Board of Commissioners members (more than 60%) is Independent Commissioners. BCA has 3 Independent Commissioners among its 5 members on the Board of Commissioners.

#### **b. Duties and Responsibilities of the Board of Commissioners**

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

- 1) Overseeing BCA's management policies and general management, for the benefit of BCA, in accordance with the purposes and objectives of BCA's Articles of Association, including:
  - a) The Board of Commissioners provides insights, input, and approval on the annual work plan and budget prepared and submitted by the Board of Directors in accordance with the applicable regulations.
  - b) The Board of Commissioners supervises, provides input, and is jointly responsible for the Annual Report and Sustainability Report prepared by the Board of Directors.
  - c) The Board of Commissioners provides input and considerations on the Board of Directors' proposals regarding dividend distribution before seeking approval at the General Meeting of Shareholders.
  - d) The Board of Commissioners holds a meeting to approve interim dividends decided by the Board of Directors in accordance with the provisions of the applicable Articles of Association.
  - e) The Board of Commissioners supervises credit distribution by approving credit decisions above a certain nominal amount and granting credit approvals to related parties.

- f) The Board of Commissioners provides insights, input, and approval on the proposed Division of Duties and Responsibilities of the Board of Directors and the BCA Main Organizational Framework.
- 2) Directing, monitoring, and evaluating the implementation of BCA's strategic policies and providing advice to the Board of Directors in accordance with regulations, including:
  - a) The Board of Commissioners approved the Board of Directors' plan to repurchase BCA shares. The Board of Commissioners also ensured the share purchase complies with the applicable laws and BCA's internal regulations.
  - b) The Board of Commissioners reviewed and approved proposed adjustments to the Equity Participation Provisions.
  - c) The Board of Commissioners provided direction to the Board of Directors and approval regarding the divestment of subsidiaries.
  - d) The Board of Commissioners reviewed and approved updates to the Recovery Plan submitted to the Regulator.
  - e) The Board of Commissioners submitted an annual Management Report and its Supervisory Results regarding the Special Profit and Loss for Payment System Services to Bank Indonesia.
  - f) The Board of Commissioners reported its supervision of the Bank's Business Plan and the results of its supervision of the implementation of internal control policies and procedures in the Bank's financial reporting process to OJK on a semiannual basis.
  - g) The Board of Commissioners reviewed the implementation of the Bank's Business Plan submitted by the Board of Directors to the OJK.
  - h) The Board of Commissioners monitored the Bank's Information Technology Strategic Plan.
  - i) The Board of Commissioners provided insights and input to the Board of Directors when discussing BCA's performance periodically.
  - j) The Board of Commissioners monitors and provides input on ESG developments.
  - k) The Board of Commissioners and Directors discuss industry updates subject to regulatory attention.
- 3) Ensuring the implementation of Corporate Governance principles in all BCA business activities at all levels of the BCA organization, by supervising at least:
  - a) Monitoring and providing regular input to the Board of Directors regarding the implementation of corporate governance;
  - b) Implementation of the duties and responsibilities of the Board of Commissioners and Directors;
  - c) Implementation of the activities of members of the Board of Directors and Board of Commissioners who hold positions in non-profit organizations or institutions. These matters have been discussed in Board of Commissioners meetings.
  - d) Implementation of Affiliated Transactions conducted by BCA includes, among other things, the fairness of the transaction object and the fairness opinion from a licensed and registered Independent Appraiser, while considering the recommendations of the Audit Committee.
  - e) Completeness and implementation of the duties of committees and work units exercising internal control functions;
    - (1) Conduct regular discussions with the Audit Committee, Risk Monitoring Committee, and Integrated Governance Committee regarding the implementation reports submitted by each Committee.
    - (2) Approve the membership of the Remuneration and Nomination Committee.
    - (3) Review and approve adjustments to the Audit Committee Charter.
  - f) Implementation and periodic evaluation of the remuneration policy;
  - g) Implementation of the compliance function, internal auditors, and external auditors:

#### **Compliance Function**

- The Board of Commissioners oversees the Bank's compliance with applicable rules and regulations.
- The Board of Commissioners reviews reports on the implementation of the duties and responsibilities of the BCA Integrated Compliance Work Unit.

- The Board of Commissioners receives, monitors, and discusses with the Board of Directors the development of new regulations from Bank Indonesia and OJK.
- The Board of Commissioners periodically discusses the implementation of Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Proliferation of Weapons Financing of Mass Destruction (AML, CFT, and CPF) programs while approving adjustments to AML, CFT, and CPF policy and implementation provisions.

#### **Internal Auditor Function**

- The Board of Commissioners receives reports on the implementation of key internal audit findings on a semi-annual basis, discusses them, and provides input to the Internal Audit Division (DAI) before submitting them to the OJK.
- The Board of Commissioners receives audit reports from the DAI periodically and discusses these findings with the DAI and the Audit Committee, particularly those deemed necessary for the Board of Commissioners' information and input.
- The Board of Commissioners evaluates the DAI's performance based on recommendations from the Audit Committee.

#### **External Auditor Function**

- Based on recommendations from the Audit Committee, the Board of Commissioners has already submitted a proposal to the 2025 BCA Annual General Meeting of Shareholders (AGM) regarding the appointment of the Public Accounting Firm (KAP) Rintis, Jumadi, Rianto & Rekan, part of the PwC global network of firms, to audit BCA's financial statements for the 2025 fiscal year. This was approved at the AGM.
- h) Implementation of risk management, including internal control systems:
    - (1) The Board of Commissioners oversees the management of assets and liabilities (ALCO) carried out by the BCA management.
    - (2) The Board of Commissioners periodically evaluates the Risk Management Policy, including approving the Credit Rescue and Write-Off Policy, the Banking Book Interest Rate Risk Management Policy, the Business Continuity Management Policy, and the MSME Business Credit KUR/Kredit Usaha Rakyat Restructuring Relaxation Policy.
    - (3) The Board of Commissioners discusses and provides direction to the Board of Directors and work units regarding risk developments in the banking industry, including discussions on cyber risk and reputation risk, which are increasingly being implemented due to digital transformation.
  - i) Provision of funds to related parties and the provision of large funds;
  - j) BCA's strategic plan;
  - k) Transparency of financial and non-financial conditions;
  - l) Approving and periodically reviewing BCA's vision, mission, and core values.
- 4) Overseeing the implementation of Integrated Governance, including evaluating and directing adjustments to the BCA Integrated Governance Guidelines.
  - 5) Ensuring the Board of Directors has followed up on audit findings and recommendations from the Internal Auditor (DAI), External Auditor, the results of supervision by the OJK, Bank Indonesia, and/ or other authorities.
  - 6) Providing approval for the merger or amalgamation, and/or integration plan, which includes a summary of the independent appraiser's report.
  - 7) Notifying the OJK or Bank Indonesia no later than 5 working days after discovery of violations of laws and regulations in the financial, banking, and those related to BCA's business activities and/ or circumstances or anticipated circumstances potentially jeopardize BCA's business continuity.
  - 8) The Board of Commissioners is required to ensure the established committees carry out their duties effectively and evaluate their performance at the end of each financial year.
  - 9) Organizing meetings, including preparing minutes of meetings, in the following areas:
    - a) Regular meetings of the Board of Commissioners at least once every 2 months.
    - b) Regular meetings of the Board of Commissioners and Directors at least once every 4 months.
  - 10) Under certain circumstances, organizing the Annual General Meeting of Shareholders

(AGMS) and other GMS in accordance with its authority as stipulated in applicable laws and regulations and BCA's Articles of Association.

- 11) Preparing and submitting reports to the GMS, the OJK, or other parties.
- 12) Approving the Bank's Business Plan and Sustainable Finance Action Plan prepared by the Board of Directors.

**c. Board of Commissioners Share Ownership Reaching 5% or More of Paid-Up Capital**

BCA's reporting policy for Board of Commissioners share ownership refers to Article 57 of OJK Regulation on the Implementation of Corporate Governance for Commercial Banks, OJK Circular Letter No. 14/SEOJK.03/2025 regarding Governance Implementation for Commercial Banks, OJK Regulation No. 4 of 2024 and OJK Circular Letter No. 10/SEOJK.04/2025 concerning Reporting of Share Ownership and Share Pledging Activities at the Public Companies.

**Implementation of Reporting Policies for Share Ownership or Changes in Share Ownership**

The Board of Commissioners Charter regulates the following:

- 1) Disclosure obligations for Board of Commissioners share ownership reaching 5% or more of paidup capital, including the type and number of shares held in BCA, other banks, non-bank financial institutions, and other companies located domestically or abroad. Additionally, BCA maintains a Special Register as mandated by Article 50 of the Limited Liability Company Law.
- 2) The obligation of members of the Board of Commissioners to submit information to BCA regarding ownership and changes in BCA shares within a maximum of 3 working days after the occurrence of ownership or any change in ownership of shares of the Public Company. The policy for reporting ownership or any change in share ownership of the Board of Commissioners is in accordance with OJK Regulation No. 4 of 2024 and OJK Circular Letter No. 10/SEOJK.04/2025 concerning Reports on Ownership or Any Change in Share Ownership of Public Companies and Reports on Activities of Pledge of Shares of Public Companies and has been disseminated through Memorandum No. 075/MO/ESG/2024 dated August 06, 2024 by the Corporate Secretary to all Directors and Board of Commissioners.

BCA has also submitted a report on the share ownership of the Board of Commissioners at the beginning of each month and on any changes in the share ownership of the Board of Commissioners in 2025 through the e-reporting system to the OJK and the IDX as a form of BCA's openness and compliance with internal and external policies regarding share ownership reports.

**Table of Board of Commissioners Share Ownership Reaching 5% or More of Paid-Up Capital as of December 31, 2025**

Name	Share ownership of the Board of Commissioners' members amounting to 5% or more in:			
	BCA	Other Banks	Non-Bank Financial Institutions	Other Companies
Djohan Emir Setijoso <sup>1)</sup>	-	-	-	□
Jahja Setiaatmadja <sup>2)</sup>	-	-	-	□
Tonny Kusnadi	-	-	-	□
Cyrillus Harinowo	-	-	-	□
Raden Pardede	-	-	-	□
Sumantri Slamet	-	-	-	-

1) Resigned from his position as President Commissioner effective June 1, 2025.

2) Term as President Director ends effective 1 June 2025, and effectively assumed his position as President Commissioner on June 1, 2025.

#### d. Financial and Family Affiliation of Board of Commissioners' Members

Name	Position	Family Affiliation with:								Financial Affiliation with:							
		Board of Commissioners		Board of Directors		Controlling Shareholder		Ultimate Controlling Shareholder		Board of Commissioners		Board of Directors		Controlling Shareholder		Ultimate Controlling Shareholder	
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Jahja Setiaatmadja	President Commissioner	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Tonny Kusnadi	Commissioner	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Cyrillus Harinowo	Independent Commissioner	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Raden Pardede	Independent Commissioner	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓
Sumantri Slamet	Independent Commissioner	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓	-	✓

#### e. Board of Commissioners Meeting

Name	Total Attendance*)	Total Meetings	Attendance Percentage
Djohan Emir Setijoso <sup>1)</sup>	18	20	90%
Jahja Setiaatmadja <sup>2)</sup>	18	19	95%
Tonny Kusnadi	39	39	100%
Cyrillus Harinowo	38	39	97%
Raden Pardede	39	39	100%
Sumantri Slamet	38	39	97%

Description:

1) Resignation as President Commissioner effective as of June 1, 2025  
2) Effective as President Commissioner since June 1, 2025.  
\*) Attended in person or via teleconference

#### f. Board of Commissioners Strategic Oversight

The Board of Commissioners convened 39 meetings and 8 joint sessions with the Board of Directors during the year. The following summarizes 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"> <li>Oversee BCA's business and operational performance and continuously monitor the condition of the Indonesian banking industry through 2025, including macroeconomy, geopolitical issues, interest rate movement, and business competition.</li> <li>Provide direction and approval regarding business development and the implementation of corporate actions such as dividend distribution, shares buyback, and subsidiary divestment.</li> <li>Provide input to management on liquidity optimization, credit distribution, asset allocation and management</li> </ul>
Risk Management	<ul style="list-style-type: none"> <li>Directing efforts to strengthen credit risk management by reviewing the credit granting process for high-risk borrowers, including exposure to volatile commodity sectors.</li> <li>Providing direction and review for the use of independent surveyors or appraisers for project financing loans.</li> <li>Monitoring and assessing risk profile, the implementation of integrated risk management, and capital structure.</li> <li>Monitoring current industry condition and identifying potential future events to anticipate increases in NPLs, and reviewing write-off and asset quality.</li> <li>Provide advice to support public relations activities and media collaborations to maintain the company's reputation.</li> <li>Hold regular discussions with the IT division and the Risk Management Unit to ensure the implementation of cyber risk.</li> </ul>
Audit & Compliance	<ul style="list-style-type: none"> <li>Conduct regular discussions with the Compliance Division regarding the implementation of AML, CFT, and PPPSPM.</li> </ul>

- Monitor and review audit scope.
- Monitor internal audit assessments of work unit and branch performance

### 3. Board of Commissioners's Committees

#### a. Audit Committee

##### 1) Structure, Membership, Expertise and Independency of Committee Members

###### Structure and Membership

The composition of the BCA Audit Committee complies with the applicable PJOK and the Audit Committee Charter. Throughout 2025, there were no changes to the membership of the BCA Audit Committee. It consists of three members appointed based on the Board of Directors Decision No. 073/ SK/DIR/2021 dated April 22, 2021, and the Board of Commissioners Minutes of Meeting No. 20/RR/ KOM/2021 dated April 22, 2021.

Name	Position in Committee	Position in BCA	Term of Office by AGMS
Sumantri Slamet	Chairman (concurrently serving as Member)	Independent Commissioner	2021 - 2026
Fanny Sagitadewi	Member	Independent Party	2021 - 2026
Rallyati A. Wibowo	Member	Independent Party	2021 - 2026

###### Expertise

Name	Expertise
Sumantri Slamet	Throughout his career, he has gained extensive experience across various fields and assignments, including IT, finance, capital markets, audit, risk management, and remuneration & nomination
Fanny Sagitadewi	During her career, she has gained experience and expertise in various fields and assignments, including banking.
Rallyati A. Wibowo	During her career, she has gained experience and expertise in various fields and assignments, including Finance and Accounting.

###### Independency

All Audit Committee members are independent parties free from financial, managerial, shareholding, and/or familial affiliations with members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholders. Furthermore, they maintain no business affiliation with BCA of which is capable of influencing their ability to act independently. All Audit Committee members perform their duties independently, without intervention from any party.

Independency aspects of Audit Committee members are presented in the following table:

Independency Aspects	Sumantri Slamet	Fanny Sagitadewi	Rallyati A. Wibowo
Has no financial affiliation with the Board of Commissioners and Directors.	✓	✓	✓
Has no management affiliation with BCA, BCA subsidiaries, or affiliated companies.	✓	✓	✓
Has no share ownership in BCA.	✓	✓	✓
Has no family affiliation with the Board of Commissioners, Directors, and/or fellow members of the Audit Committee.	✓	✓	✓
Has no family affiliation with the Board of Commissioners, Directors, and/or fellow members of the Audit Committee.	✓	✓	✓

##### 2) Duties and Responsibilities of Committee

In alignment with OJK Regulation No. 55/ POJK.04/2015 concerning the Establishment and Implementation Guidelines for Audit Committee Work, the Audit Committee holds the following duties and responsibilities:

###### a) Financial Reporting and Information

- (1) Reviewing financial information to be released to the public and/or authorities, along with other reports related to BCA's financial information.
  - (2) Reviewing and reporting to the Board of Commissioners regarding complaints involving BCA's accounting processes and financial reporting.
- b) Internal Audit
- (1) Providing recommendations to the Board of Commissioners regarding the audit plan, scope, and budget of the Internal DAI.
  - (2) Monitoring and reviewing the effectiveness of BCA's internal audit implementation.
  - (3) Evaluating DAI performance concerning the adequacy and effectiveness of the internal audit function; ensuring DAI upholds integrity in its duties, and providing recommendations to the Board of Commissioners regarding overall annual DAI remuneration and performance awards.
  - (4) Ensuring DAI maintains communication with the Board of Directors, Board of Commissioners, External Auditors, OJK, BI, and other relevant parties.
  - (5) Ensuring DAI operates independently.
- c) External Audit
- (1) Providing recommendations based on 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) auditing the financial statements, based on:
    - (a) Independency of the PA, PAF, and PAF insiders.
    - (b) Audit scope.
    - (c) Audit fees.
    - (d) Expertise and experience of the PA, PAF, and the PAF audit team.
    - (e) Methodology, techniques, and tools utilized by the PAF.
    - (f) Benefits of a fresh perspective gained through the rotation of the PA, PAF, and the PAF audit team.
    - (g) Potential risks of using the same PAF for consecutive, prolonged periods.
    - (h) Evaluation results for prior-period audit services performed by the PA and PAF on annual historical financial information, if an.
  - (2) Evaluating the provision of annual historical financial information audit services by the PA and/or PAF. This evaluation shall be conducted, at minimum, through:
    - (a) Conformity of the audit implementation by the PA and/or PAF with applicable Auditing Standards.
    - (b) Adequacy of fieldwork time.
    - (c) Review of the service scope and sampling adequacy.
    - (d) Improvement recommendations provided by the PA and/or PAF.
    - (e) Conformity of Financial Statements with applicable Financial Accounting Standards (SAK).
    - (f) Providing independent opinions in the event of disagreements between management and the PAF regarding the services provided.
- d) Internal Control Processes/Systems
- (1) Ensuring the Board of Directors takes prompt necessary action regarding findings from the DAI, PA, and supervision results from OJK and BI.
  - (2) Providing recommendations to the Board of Commissioners to appoint an independent external quality controller to review the DAI.
- e) Governance and Compliance
- (1) Monitoring the effective and sustainable implementation of Good Corporate Governance (GCG).
  - (2) Reviewing and advising the Board of Commissioners regarding BCA's potential conflicts of interest.
  - (3) Reviewing BCA's compliance with banking and capital market laws, regulations, and other provisions related to BCA's business activities.
  - (4) Maintaining the confidentiality of BCA documents, data, and information.
  - (5) Attending the BCA Annual GMS.
  - (6) Performing other duties relevant to the Audit Committee function as requested by the Board of Commissioners.

### 3) Committee Meeting Frequency

Throughout 2025, the Audit Committee held 30 meetings.

The attendance data for Audit Committee members throughout 2025 is as follows:

Name	Total Meetings	Attendance	Percentage
Sumantri Slamet	30	30	100%
Fanny Sagitadewi	30	30	100%
Rallyati A. Wibowo	30	30	100%

### 4) Realization of the Committee Work Program and Activities

The realization of the BCA Audit Committee Work Program, in accordance with the Audit Committee Charter throughout 2025, is as follows:

- a) Evaluating and providing recommendations to the Board of Commissioners on the reappointment of KAP Rintis, Jumadi, Rianto & Rekan, a member firm of the PwC global network, to audit BCA's Financial Statements for the 2025 financial year.
- b) Meeting with KAP Rintis, Jumadi, Rianto & Rekan to discuss the plan and scope of the audit for BCA's 2025 Financial Statements.
- c) Meeting with Group Accounting to review BCA's financial statements scheduled for quarterly publication.
- d) Meeting with the DAI of 6 (six) times to:
  - (1) Evaluate annual planning.
  - (2) Evaluate the implementation of internal audits every semester.
  - (3) Discuss audit findings deemed significant.
- e) Reviewing internal audit reports and monitoring subsequent follow-up actions.
- f) Reviewing BCA's compliance with applicable provisions, regulations, and laws in the banking sector through a review of compliance reports related to prudential provisions reported each semester.
- g) Reviewing credit portfolio reports issued every semester.
- h) Monitoring risk management implementation through quarterly BCA Risk Profile reports and monthly Operation Risk Management Information System (ORMIS) reports.
- i) Reporting quarterly findings and routine evaluations of governance, risk management, compliance, and control to the Board of Commissioners.
- j) Virtually attending the 2025 BCA AGMS, Analyst Meetings, and National Working Meetings.
- k) Providing assessments of the DAI, the results of which are submitted to the Board of Commissioners for further submission to the RNC, pursuant to OJK Regulation No. 1/POJK.03/2019 concerning the Implementation of Internal Audit Functions in Commercial Banks.
- l) Reviewing and meeting with KAP Rintis, Jumadi, Rianto & Rekan to discuss the final audit results of BCA's 2024 Financial Statements and the Management Letter.

### b. Risk Oversight Committee

#### 1) Structure, Membership, Expertise and Independence of Committee Members

##### Structure and Membership

The BCA ROC membership composition complies with applicable OJK Regulations and the ROC Charter. Throughout 2025, changes occurred within the ROC membership. The Committee consists of 4 (four) members appointed by the Board of Directors Decision No. 0212/SK/DIR/2023, following the Board of Commissioners Minutes of Meeting No. 050/RR/KOM/2023 dated December 6, 2023.

##### Composition of ROC Members as of December 31, 2025

Name	Position in Committee	Position in BCA	Term of Office by AGMS
Cyrellus Harinowo	Chairman (concurrently serving as 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

### Expertise

Name	Expertise
Cyrrillus Harinowo	Throughout his career, he has gained extensive experience across various fields and assignments, including monetary economics, macro & international economics, banking & finance, and renewable energy.
Endang Swasthika Wibowo	During her career, she has gained experience and expertise in various fields and assignments, including finance and banking.
Joanes Justira Gunawan	During his career, he has gained experience and expertise in auditing, particularly IT auditing and electronic-based operations.
Reinhard Harianja	During his career, he has gained experience and expertise in various fields and assignments in Risk Management.

### Independency of Committee

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

Independency aspects of ROC members are presented in the following table:

Independency Aspects	Cyrrillus Harinowo	Endang Swasthika Wibowo	Joanes Justira Gunawan	Reinhard Harianja
Having no financial affiliation with the Board of Commissioners and Directors.	✓	✓	✓	✓
Having no management affiliation with the Company, subsidiaries, or affiliated companies.	✓	✓	✓	✓
Having no share ownership in the Company.	✓	✓	✓	✓
Having no family affiliation with the Board of Commissioners, Board of Directors, and/or fellow Risk Oversight Committee members.	✓	✓	✓	✓
Having no affiliation as a political party official, public official, or government representative.	✓	✓	✓	✓

### 2) Duties and Responsibilities of Committee

The ROC holds duties and responsibilities including:

a) Mandatory performance of at least the following:

- (1) Evaluating consistency between risk management policies and Bank policy implementation.
- (2) Monitoring and evaluating the performance of the Risk Management Committee, the Risk Management Unit, and the IT Steering Committee.

b) Evaluation results mentioned in point a)(1) and monitoring results in point a)(2) serve as the basis for providing recommendatins to the Board of Commissioners. These recommendations aim to enhance the effectiveness of risk management duties and ensure proper execution of risk management policies.

c) Supporting the Board of Commissioners' risk management responsibilities, specifically regarding:

- (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) The ROC also oversees risk management implementation concerning:
- (1) Country Risk;
  - (2) Transfer Risk;
  - (3) IT Risk;
  - (4) Cyber Risk;
  - (5) Outsourcing Risk;
  - (6) Climate Risk; and
  - (7) ESG Risk.
- alongside other emerging banking risks.
- e) Supervising the implementation of risk stress testing and evaluation.
- f) Assisting the Board of Commissioners in monitoring the risk-based Bank Soundness Level, particularly the risk profile parameters.
- g) Assisting the Board of Commissioners in overseeing and evaluating Recovery Plan implementation.
- h) Formulating the ROC Charter and conducting reviews as necessary.
- i) Performing other duties assigned by the Board of Commissioners from time to time.

### 3) Committee Meeting Frequency

Throughout 2025, the ROC held 16 meetings.

The attendance data for ROC members during these 2025 meetings is as follows:

Name	Total Meetings	Attendance	Percentage
Cyrellus Harinowo	16	16	100%
Endang Swasthika Wibowo	16	16	100%
Joanes Justira Gunawan	16	16	100%
Reinhard Harianja	16	16	100%

### 4) Realization of the Committee Work Program and Activities

Throughout 2025, the ROC performed the following activities:

- a) Reviewing and adjusting the ROC Charter.
- b) Monitoring the performance of the Risk Management Committee, the Risk Management Division, and the ITSC (Information Technology Steering Committee).
- c) Monitoring and analyzing BCA's risk profile, with specific focus on credit, operational, market, liquidity, legal, and reputation risks.
- d) Analyzing and evaluating credit, market, and liquidity risk stress test results.
- e) Ensuring proper implementation of Good Corporate Governance by physically attending the BCA National Working Meeting and virtually attending the 2025 Analyst Meeting.
- f) Monitoring monthly risk management realization, specifically regarding the control and limits of credit, liquidity, market, and operational risks.
- g) Monitoring developments, impacts, and risk mitigation related to government budget efficiency and US tariff policies.
- h) Evaluating cyber security developments.
- i) Evaluating business continuity implementation.
- j) Monitoring and reviewing new regulations concerning personal data protection.

### c. Remuneration and Nomination Committee

#### 1) Structure, Membership, Expertise and Independence of Committee Members

## Structure and Membership

The RNC composition complies with OJK Regulation No. 34/POJK.04/2014 and the RNC Guidelines. During 2025, changes occurred within the committee membership. The RNC currently consists of 3 members appointed under the Board of Directors Decision No. 0102/SK/DIR/2025 dated June 4, 2025, following the Board of Commissioners Meeting Decision No. 024/RR/KOM/2025.

### Composition of RNC as of 31 December 2025

Name	Position in Committee	Position in BCA	Term of Office by AGMS
Raden Pardede	Chairman	Independent Commissioner	2021 - 2026
D.E. Setijoso <sup>1)</sup>	Member	President Commissioner	2021 - 2025
Jahja Setiaatmadja <sup>2)</sup>	Member	President Commissioner	2025 - 2026
Rudi Lim <sup>1)</sup>	Member	Head of Human Capital Management Division <sup>3)</sup>	2021 - 2025
Alrianto Djunaidi <sup>2)</sup>	Member	Head of Human Capital Management Division <sup>3)</sup>	2025 - 2026

1) Serving effectively until June 4, 2025.  
2) Serving effectively since June 4, 2025.  
3) The Head of Human Capital Management Division is an Executive Officer of whom the expertise includes remuneration systems, nomination processes, and succession planning.

## Expertise

Name	Expertise
Raden Pardede	Throughout his career, he has gained extensive experience across various fields and assignments, including monetary economics, economic development planning, scenario planning, banking & finance, and macroeconomic policy.
Jahja Setiaatmadja	Throughout his career, he has gained extensive experience across various fields and assignments, including change management, banking strategy, treasury, accounting & financial management, corporate banking, international banking, risk management, and digital banking.
Alrianto Djunaidi	During his career, he has gained experience and expertise in various fields and assignments, including recruitment, talent management, learning materials development, and human resource development. Prior to his current position in Human Capital Management, he had experience in logistics, planning, and procurement of goods and services.

## Independency of Committee

All RNC members have fulfilled the independency criteria, having no financial, management, share ownership, or family affiliation with members of the Board of Commissioners, Board of Directors, or the Controlling Shareholder. Furthermore, they maintain no business affiliation with BCA potentially affecting their ability to act independently. All RNC members discharge their duties independently without intervention from any party.

Independency aspects of RNC members are explained in the following table:

Independency Aspects	Raden Pardede	D.E. Setijoso <sup>1)</sup>	Jahja Setiaatmadja <sup>2)</sup>	Rudi Lim <sup>1)</sup>	Alrianto Djunaidi <sup>2)</sup>
Having no financial affiliation with the Board of Commissioners and Directors.	✓	✓	✓	✓	✓
Having no management affiliation with the Company, subsidiaries, or affiliated companies.	✓	✓	✓	-	-
Having no share ownership in the Company.	✓	-	-	-	-

Having no family affiliation with the Board of Commissioners, Board of Directors, and/or fellow RNC members.	✓	✓	✓	✓	✓
Having no affiliation as a political party official, public official, or government representative.	✓	✓	✓	✓	✓
1) Serving effectively until June 4, 2025. 2) Serving effectively as of June 4, 2025.					

## 2) Duties and Responsibilities of Committee

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

### Regarding the Remuneration Function:

- a) Evaluating and ensuring the BCA remuneration policy complies with applicable regulations and remains based on performance, risk, peer group fairness, long-term goals and strategies, reserve fulfillment as regulated by law, and BCA's future income potential.
- b) Submitting evaluation results and providing recommendations to the Board of Commissioners concerning:
  - (1) Remuneration policies for the Board of Commissioners and Directors for submission to the GMS.
  - (2) Structure and amount of remuneration for members of the Board of Directors and/or Board of Commissioners.
  - (3) Remuneration policies for Executive Officers and employees as a whole for submission to the Board of Directors.
- c) Assisting the Board of Commissioners in performing performance assessments aligned with the remuneration received by each member of the Board of Directors and/or Board of Commissioners.
- d) Conducting periodic evaluations regarding the implementation of the remuneration policy.

### Regarding the Nomination Function:

- a) Preparing and providing recommendation to the Board of Commissioners regarding the system and procedures for selecting and/or replacing members of the Board of Commissioners and Directors to be submitted to the GMS.
- b) Providing recommendation to the Board of Commissioners concerning:
  - (1) Composition of positions for members of the Board of Directors and/or Board of Commissioners;
  - (2) Necessary policies and criteria within the nomination process;
  - (3) Performance evaluation policies for members of the Board of Directors and/or Board of Commissioners.
- c) Assisting the Board of Commissioners in assessing the performance of Board of Directors and/or Board of Commissioners members based on established benchmarks as evaluation material.
- d) Providing recommendations to the Board of Commissioners concerning:
  - (1) Capability development programs for members of the Board of Directors and/or Board of Commissioners;
  - (2) Qualified candidates for the Board of Directors and/or Board of Commissioners for submission to the GMS;
  - (3) Independent Parties to serve as members of the Audit Committee and ROC.

## 3) Committee Meeting Frequency

Throughout 2025, the RNC held 10 meetings.

Attendance data for Committee members regarding RNC meetings as of December 31, 2025, is presented as follows:

Name	Total Meetings	Attendance	Percentage
Raden Pardede	10	10	100%

D.E. Setijoso <sup>1)</sup>	5	5	100%
Rudi Lim <sup>2)</sup>	5	5	100%
Jahja Setiatmadja <sup>1)</sup>	5	5	60%
Alrianto Djunaidi <sup>2)</sup>	5	5	100%
1) effective until June 4, 2025			
2) effective as of June 4, 2025			

#### 4) Realization of the Committee's Work Program and Implementation Activities

The realization of the BCA RNC work program throughout 2025 is as follows:

- Formulating recommendations regarding proposed bonuses (tantiem) for the Board of Commissioners and Directors based on BCA's 2025 performance.
- Formulating recommendations regarding the proposed Remuneration Package for members of the Board of Commissioners and Directors for the 2026-2028 term of office.
- Conducting evaluations of the Board of Directors and Board of Commissioners self-assessment results.
- Formulating recommendations regarding the necessity to postpone or withdraw deferred variable remuneration payments from Material Risk Takers.

#### d. Integrated Governance Committee

##### 1) Structure, Membership, Expertise and Independence of Committee Members

###### Structure and Membership

The membership composition of the BCA IGC complies with applicable OJK Regulation and the IGC Charter. The IGC consists of 9 members appointed by the ME Board of Directors through Decision No. 0265/SK/DIR/2025 dated December 23, 2025, based on the decision in the Board of Commissioners Minutes of Meeting No. 044/RR/ KOM/2025 dated December 17, 2025.

#### IGC Membership Composition

Name	Position in Committee	Position within the Financial Conglomeration	Term of Office
<b>Member of ME</b>			
Cyrellus Harinowo	Chairman (concurrently serving as a Member)	Independent Commissioner of ME	6 May 2021 - AGMS 2026
Prabowo	Member	Independent Partu of ME <sup>2)</sup>	6 May 2021 - AGMS 2026
<b>Member of Subsidiaries<sup>3)</sup></b>			
Sulistiyowati	Member	Independent Commissioner PT BCA Finance	6 May 2021 - AGMS 2026
Gustiono Kustianto	Member	Independent Commissioner PT Asuransi Umum BCA	6 May 2021 - AGMS 2026
Pudjianto	Member	Independent Commissioner of PT Asuransi Jiwa BCA	6 May 2021 - AGMS 2026
Ratna Yanti	Member	Independent President Commissioner of PT Bank BCA Syariah	10 March 2023 - AGMS 2026
Sutedjo Prihatono <sup>1)</sup>	Member	Member of the Sharia Supervisory Board of PT Bank BCA Syariah	6 May 2021 - AGMS 2026
Hendra Iskandar Lubis	Member	Independent Commissioner of PT BCA Sekuritas	6 May 2021 - AGMS 2026
Janto Haviyanto <sup>4)</sup>	Member	Independent Director of BCA Finance Limited, Hong Kong	20 June 2024 - 23 December 2025
Ina Suwandi	Member	Independent Commissioner of PT Bank Digital BCA	14 September 2023 - AGMS 2026

**Remarks:**

- 1) Membership of Independent Commissioners, Independent Parties, and Sharia Supervisory Board Members on the IGC within the Financial Conglomeration is not considered as holding concurrent positions.
- 2) Independent parties serving as IGC members are appointed by the Main Entity Board of Commissioners.
- 3) The appointment of IGC members representing Independent Commissioners and/or Sharia Supervisory Board Members from Financial Services Institutions (FSIs) within the BCA Financial Conglomeration is based on nominations from each respective FSI.
- 4) The membership of BCA Finance Limited in the IGC was terminated as of December 23, 2025.

**Independency of Committee**

The independency and eligibility requirements for IGC members align with those applicable to the Board of Directors and Board of Commissioners of the Main Entity, as well as Subsidiaries within the Financial Conglomeration.

All IGC members are independent parties with no financial, management, share ownership, and/or family affiliations with members of the Board of Commissioners, Board of Directors, and/or Controlling Shareholders, nor any business relationships with BCA and/or Subsidiaries potentially affecting their ability to act independently. All IGC members also perform their duties independently without intervention from any party.

The independency aspects of IGC members are detailed in the following table:

Independency Aspects	Cyrellus Harinowo	Prabowo	Sulistiyowati	Gustiono Kustianto	Pudjianto	Ratna Yanti	Sutedjo Prihatono	Hendra Iskandar Lubis	Janto Havianto	Ina Suwandi
Having no financial affiliation with the Board of Commissioners and Directors.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Having no management affiliation with the Company, subsidiaries, or affiliated companies.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Having no share ownership in the Company.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Having no family affiliation with the Board of Commissioners, Board of Directors, and/or fellow Integrated Corporate Governance Committee members.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Having no affiliation as a political party official, public official, or government representative.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**2) Duties and Responsibilities of Committee**

The IGC duties and responsibilities include:

- a) Evaluate the implementation of Integrated Governance, at a minimum through assessing the adequacy of internal controls, integrated compliance function performance, and integrated risk management.
- b) Provide recommendations to the Main Entity Board of Commissioners for the improvement of the Integrated Governance Guidelines.

- c) Provide recommendations to the Main Entity Board of Commissioners after conducting at least:
  - (1) An evaluation of Integrated Governance implementation; and
  - (2) Monitoring of the Integrated Governance Guidelines implementation.
- d) Prepare an annual work program realization report for submission in the Main Entity Annual Report.

**3) Committee Meeting Frequency**

Throughout 2025, the IGC held 6 meetings.

The attendance data of committee members in IGC meetings throughout 2025 is as follows:

Name	Total Meetings	Attendance	Percentage
Cyrillus Harinowo	6	6	100%
Prabowo	6	6	100%
Sulistiyowati	6	6	100%
Gustiono Kustianto	6	6	100%
Pudjianto	6	6	100%
Ratna Yanti	6	6	100%
Sutedjo Prihatono	6	5	83.34%
Hendra Iskandar Lubis	6	5	83.34%
Janto Havianto	6	5	83.34%
Ina Suwandi	6	5	83.34%

**4) Realization of the Committee’s Work Program and Implementation Activities**

Throughout 2025, IGC has carried out IGC activities/work programs, namely evaluating the adequacy of the implementation of Integrated Governance at the BCA Financial Conglomerate. The evaluation activities were carried out through, among other things, presentations and discussions of the Integrated Internal Audit Report, Integrated Compliance Report, Integrated Risk Management Report, and Integrated Governance Report.

**4. Compliance, Internal Audit, and External Audit Implementation**

**a. Compliance Function**

In performing the compliance function as regulated in OJK Regulation No. 46/POJK.03/2017 concerning the Implementation of the Compliance Function for Commercial Banks, BCA has established the Compliance Division (DCP). This division operates under the Compliance Director as an independent work unit, free from the influence of other business units. Furthermore, as the Main Entity in the BCA Financial Conglomeration and in order to implement Integrated Governance for the Financial Conglomeration, BCA has incorporated an Integrated Compliance Function within the DCP organizational structure.

**1) Implementation of the Compliance Function in 2025**

Throughout 2025, the DCP carried out its functions as follows:

- a) Promoting a Compliance Culture:
  - (1) Disseminating/informing the Board of Directors, Board of Commissioners, and work units of new regulatory provisions.
  - (2) Providing regulatory information from OJK, BI, PPATK, and other laws and regulations on the BCA portal site, accessible to all work units.
  - (3) Involving DCP personnel in various training sessions, seminars on regulatory socialization, and risk management certifications, including active participation in the Banking Compliance Director Communication Forum (FKDKP) working groups.
  - (4) Performing a consultative function regarding the implementation of prevailing regulations by providing advice/responses to inquiries from work units or branches.
- b) Ensuring Policies, Systems, Procedures, and Business Activities comply with

regulations:

- (1) Identifying compliance risk sources.
  - (2) Conducting gap analyses, analyzing the impact of new regulations on BCA's operations, and proposing adjustments to internal manuals, policies, and procedures.
  - (3) Developing a Compliance Matrix Diary as a monitoring tool to maintain commitment to regulatory reporting obligations.
  - (4) Reviewing and providing opinions to ensure compliance with the applicable regulations regarding:
    - (a) Plans for new products and activities.
    - (b) Drafts of internal regulations to be issued.
    - (c) Compliance regarding corporate credit disbursement.
    - (d) Documents related to capital injection plans,
  - (5) Conducting compliance testing on the implementation of regulations at Branch Offices and Regional Offices, in collaboration with Branch Internal Supervisors and Regional Internal Supervisors,
  - (6) Monitoring compliance levels with applicable regulatory provisions related to prudential banking principles, namely:
    - (a) Minimum Capital Adequacy Requirement (KPPM)
    - (b) Minimum Statutory Reserve (GWM)
    - (c) Macroprudential Liquidity Buffer (PLM)
    - (d) Net Open Position (PDN)
    - (e) Maximum of Legal Lending Limit (BMPK)
    - (f) Non-Performing Loan (NPL)
    - (g) Macroprudential Intermediation Ratio (RIM)
    - (h) Liquidity Coverage Ratio (LCR)
    - (i) Net Stable Funding Ratio (NSFR)
    - (j) Macroprudential Inclusive Financing Ratio (RPIM)
  - (7) Monitoring the imposition of sanctions/fines from regulators.
  - (8) Conducting compliance risk assessments and preparing quarterly Compliance Risk Profile Reports to manage compliance risk.
  - (9) Preparing Quarterly Compliance Monitoring Reports submitted to the Board of Directors and Commissioners.
  - (10) Coordinating with work units for risk-based Bank Soundness Level assessments.
  - (11) Collaborating with the Environmental, Social & Governance (ESG) Subdivision regarding the implementation of BCA Governance and Integrated Governance within the BCA Financial Conglomerate.
  - (12) Utilizing Information Technology, known as Regulatory Technology (RegTech), to increase efficiency and effectiveness in managing regulatory provisions and maintaining an upto-date regulatory database.
- c) Ensuring BCA's compliance with commitments made to regulators:
- (1) Monitoring BCA's commitments to OJK, BI, and other regulators together with the Internal Audit Division (DAI).
  - (2) Monitoring and following up on requests for information/data by OJK, BI, and other regulators in the context of bank supervision.
- d) Implementing the Gratification control function:
- (1) Formulating policies and procedures for gratification control.
  - (2) Coordinating socialization activities on gratification control regulations for all BCA employees and stakeholders.
  - (3) Receiving and administering gratification reports from BCA employees
  - (4) Submitting periodic reports on the implementation of gratification control to the Board of Directors, at least once a year.
- e) Monitoring and evaluating the compliance function (Integrated/Subsidiaries):
- (1) Preparing Integrated Compliance Reports for the Board of Directors and Board of Commissioners.
  - (2) Coordinating with work units for riskbased Consolidated Bank Soundness Level assessments.

- (3) Reviewing and providing opinions to ensure compliance with regulatory provisions regarding BCA's Synergy Cooperation plans with Subsidiaries.
- (4) Coordinating with Subsidiary Compliance PICs to prepare the Integrated Compliance Risk Profile every semester.
- (5) Communicating with Subsidiaries within the scope of the compliance function implementation.

## 2) Compliance Indicators for 2025

The compliance indicators for 2025, reflecting BCA's commitment and level of adherence to applicable laws and regulations, are as follows:

Table of Compliance Indicators for 2025

No	Compliance Indicator	Applicable Provisions	BCA Achievement	Description
1	Minimum Capital Adequacy Requirement (KPPM)	Min. 14% up to <15%	29.76%	Complied with the applicable provisions
2	Non-Performing Loan (NPL) Net	Max 5%	0.67%	
3	Maximum of Legal Lending Limit (BMPK)	Max. 10% of total capital	5.46%	
4	Minimum Statutory Reserve (GWM) Rupiah	Min. 4.6%	5.61%	
5	Macroprudential Liquidity Buffer (PLM)	Min. 4%	33.54%	
6	Minimum Statutory Reserve (GWM) Foreign Currency	Min. 4%	4.27%	
7	Net Open Position (PDN)	Max. 20%	0.08%	
8	Liquidity Coverage Ratio (LCR)	Min. 100%	310.8%	
9	Macroprudential Intermediation Ratio (RIM)	84% - 94%	78.79%	In accordance with RIM's description below <sup>1)</sup>
10	RIM Current Account	Min. According to the provisions	1.00%	In accordance with RIM's description below <sup>1)</sup>
11	Net Stable Funding Ratio (NSFR)	Min. 100%	158.77%	Complied with the applicable provisions
12	Macroprudential Inclusive Financing Ratio (RPIM)	Min. 21.75%	22.75%	

Note:

1) BCA's Macroprudential Intermediation Ratio (RIM) for December 2025 is lower than the lower limit of the Target RIM set by BI at 84% in PADG No. 23 of 2025 dated October 20, 2025 concerning the Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Islamic Commercial Banks, and Islamic Business Units, so that BCA is required to form a RIM Current Account in Rupiah based on the calculation between the Lower Disincentive Parameter and the difference between BCA's RIM and the Target RIM against Rupiah DPK.

Based on PADG No. 23 of 2025 dated October 20, 2025 concerning Macroprudential Intermediation Ratios and Macroprudential Liquidity Buffers for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units, the Lower Disincentive Parameter related to RIM compliance for Banks with RIM conditions of 19% is set at 0.15.

## 3) 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 OJK 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. Throughout 2025, the following activities were carried out in connection with the implementation of the AML, CTF, and PFPWMD programs:

- a) providing periodic reports to the Board of Directors and Board of Commissioners on the implementation of the AML, CTF, and PFPWMD,

- b) 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,
- c) coordinating the implementation of updating customer data by setting targets and monitoring their achievement,
- d) screening customer and transaction data against watchlists published by competent authorities, such as the List of Suspected Terrorists and Terrorist Organizations (DTTOT), 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,
- e) identifying and assessing risks associated with the implementation of APU, PPT, and PFPWMD using a risk-based approach, considering customer, country or geographic area, product and service, and distribution network factors,
- f) in collaboration with Branch Internal Supervisors, conducting compliance tests on the implementation of AML, CTF, and PFPWMD at Branch Offices,
- g) 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) through the Integrated Service User Information System (SIPESAT) and the Information System for Suspected Terrorism Financing (SIPENDAR),
- h) ongoingly increasing 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,
- i) developing training materials for the Implementation of AML, CTF, and PFPWMD,
- j) reviewing and providing 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,
- k) participating in activities organized by regulators, including the implementation of:
  - (1) *PPATK's Financial Integrity Rating (FIR) 2025*,
  - (2) The 2025 Pilot Assessment for the Performance Effectiveness Index of the AML-CFT Regime,
  - (3) The 2025 National Risk Assessment (NRA) for Money Laundering, Terrorism Financing, and the Financing of Proliferation of Weapons of Mass Destruction,
  - (4) PPATK's 2025 Risk-Based Mentoring Program (Promensisko) regarding Cybercrime.

#### **b. Internal audit function**

The Internal Audit Division (DAI) was established to strengthen the Company's ability to create, protect, and maintain BCA's value by providing independent, risk-based, and objective assurance, advice, insights, and foresight. It serves as a strategic management partner in building BCA as a sound and leading banking institution. DAI performs its audit function to assess the adequacy and effectiveness of BCA's governance, risk management, and internal control processes, guided by OJK Regulation No. 1/POJK.03/2019 concerning the Implementation of Internal Audit Functions in Commercial Banks and the International Professional Practices Framework established by The Institute of Internal Auditors as the professional standard for internal auditing.

In performing its role as the third line, DAI continuously coordinates and communicates with other line units/functions to collaborate in creating and maintaining value aligned with stakeholder interests.

#### **1) Implementation of Internal Audit Division Duties in 2025**

In 2025, DAI conducted audits of Branch Offices, Regional Offices, Head Office Divisions/Units, and Subsidiaries, as well as business processes in accordance with the Annual Audit Plan. This plan was established based on periodic risk assessments considering the latest risk factors. The focus of the 2025 audit implementation included:

- a) Treasury activities.
- b) Complaint handling processes and EDC operations.
- c) Reliability of applications supporting bank operations, such as Mobile Banking & Credit Card applications.
- d) Information Security, Cyber Resilience, and Personal Data Protection.
- e) Credit quality reviews and credit recovery.
- f) Implementation of Risk Management.
- g) Increasing audit coverage through continuous auditing and data analytics.
- h) Enhancing the integrated internal audit function.

Throughout 2025, DAI held meetings with the President Director 8 times, with the Audit Committee 8, and with the Board of Commissioners 2 times.

## **2) Internal Audit Division Advisory Activities in 2025**

Throughout 2025, DAI performed advisory activities related to governance processes, risk management, and internal control. These activities covered various aspects such as conducting independent reviews, postimplementation reviews, and facilitating discussions regarding risks and controls. In advisory activities, the audit function provides advice without providing assurance or assuming management responsibilities to maintain objectivity.

## **3) Audit Activity Focus for 2026**

The audit focus for 2026, based on risk assessment results, primarily relates to credit, operational, market, and liquidity risks, including:

- a) Reliability of applications supporting bank operations, such as the Deposit & Loan System and Application Programming Interface (API)
- b) Third Party Management, assessing the effectiveness of risk management over third parties.
- c) Information System examinations, including: Enterprise Security as well as Identity & Access Management
- d) Treasury activities in Money Market and Foreign Exchange transactions
- e) Conducted reviews of credit quality along with its allowance for impairment losses.
- f) Monitoring financial conglomeration activities.
- g) Implementation of Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation Financing of Weapons of Mass Destruction Programs.
- h) Expanded audit coverage through continuous auditing.

## **c. External Audit Function**

In complying with the implementation of the external audit function as per OJK Regulation No. 9 of 2023 and OJK Circular Letter No. 18/SEOJK.03/2023 regarding the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities, therefore:

- 1) BCA utilizes the services of a Public Accountant (PA) and/or a Public Accounting Firm (PAF) to audit annual historical financial information based on a cooperation agreement with the PAF of which specifies the audit scope.
- 2) The appointed PA and/or PAF must be actively registered with the OJK and possess competencies suitable for the complexity of BCA's business.
- 3) The use of audit services from the same PA is limited to a maximum cumulative period of 7 years starting from the 2017 fiscal year. BCA may reappoint the same PA only after a cooling-off period of 5 consecutive reporting fiscal years.
- 4) The appointment of the PA and/or PAF to provide audit services on annual historical financial information must be decided by the General Meeting of Shareholders (GMS), by considering the proposal from the Board of Commissioners. Such proposal must consider the recommendations of the Audit Committee. In the event the GMS is unable to decide on the appointment, the GMS may delegate said authority to the Board of Commissioners, accompanied by an explanation regarding the reasons for the delegation of authority and the criteria or limitations of the PA/PAF that may be appointed.
- 5) In preparing recommendations, the Audit Committee considers:

- a) Independency of the PA, PAF, and PAF insiders;
  - b) Audit scopes;
  - c) Audit fees;
  - d) Expertise and experience of the PA, PAF, and the PAF audit team;
  - e) Audit methodology, techniques, and tools used by the PAF;
  - f) Benefits of a fresh perspective obtained through the rotation of the PA, PAF, and the PAF audit team;
  - g) Potential risks of using audit services from the same PAF consecutively for a significantly long period; and
  - h) Results of the evaluation of the performance of annual historical financial information audit services provided by the PA and PAF in the previous period.
- 6) BCA reports the appointment of the PA and/or PAF for the audit of annual historical financial information using the form provided in the appendix of OJK Circular Letter No. 18/SEOJK.03/2023 concerning Procedures for the Use of PA and PAF Services in Financial Services Activities, attaching the following:
- a) Appointment documents for the PA and/or PAF, including the Summary of GMS Minutes, and the Work Agreement between BCA and the PAF.
  - b) Audit Committee recommendations and the considerations used in providing the recommendation for the appointment of the PA and/or PAF.

#### **1) Effectiveness of External Audit Implementation**

The Audit Committee evaluates the performance of the annual historical financial information audit services provided by the PA and/or PAF, which at a minimum includes:

- a) Compliance of the audit implementation by the PA and/or PAF with applicable auditing standards;
- b) Adequacy of fieldwork time;
- c) Review on the scope of services provided and the adequacy of sampling; and
- d) Recommendations for improvement provided by the PA and/or PAF.

The Audit Committee's evaluation report is submitted by the BCA Board of Directors using the form provided in the appendix of OJK Circular Letter No. 18/ SEOJK.03/2023 concerning Procedures for the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities and was signed by the Audit Committee on February 4, 2025.

#### **2) Relations between the Bank, Public Accountant, and the Financial Services Authority**

Throughout the audit implementation, BCA maintains continuous communication with the external auditors regarding the audit plan, audit progress, and other significant issues to support a smooth audit process. Reports on audit results are submitted to OJK in accordance with the applicable laws and regulations.

### **5. Risk Management Implementation including Internal Control System**

BCA maintains an effective risk management system and internal control system tailored to the objectives, business policies, size, and complexity of BCA's business activities. The Board of Commissioners and Directors of BCA are responsible for the integrated implementation of risk management and internal control systems across BCA and its Subsidiaries.

In the implementation of risk management, BCA is guided by regulatory requirements and international best practices.

#### **a. Active Supervision of the Board of Commissioners and Directors**

The Board of Commissioners and Directors are responsible for the effective implementation of risk management at BCA. The implementation of active supervision by the Board of Commissioners and Directors refers to the duties and responsibilities stipulated in the Articles of Association and applicable internal and external regulations. Active supervision related to the implementation of risk management has been carried out by:

- 1) Board of Commissioners

- a) Approving and evaluating risk management policies, strategies, and frameworks.
  - b) Ensuring the effective implementation of risk management policies and processes.
  - c) Providing guidance for periodic improvements in the implementation of risk management policies.
  - d) In performing its duties, the Board of Commissioners is supported by, among others, the Audit Committee, the Risk Oversight Committee, and the Remuneration and Nomination Committee.
- 2) Board of Directors
- a) Developing and evaluating risk management policies, strategies, and frameworks, by considering risk appetite and risk tolerance.
  - b) Responsible for the implementation of risk management policies, strategies, and frameworks, including monitoring internal and external conditions directly or indirectly affecting BCA's business strategy.
  - c) In performing its duties, the Board of Directors is supported by several committees, including the Risk Management Committee (RMC), the Integrated Risk Management Committee (IRMC), and other committees such as the Asset and Liability Committee (ALCO), the Credit Policy Committee (CPC), the Credit Committee (CC), the Information Technology Steering Committee (ITSC), and Employee Relations Committee.

BCA has also established a Risk Management Division (MRK) organizational structure with the mission of ensuring BCA and its subsidiaries effectively and efficiently mitigate risks through identification, measurement, monitoring, control, and reporting in accordance with the risk management framework; and are capable of responding to emergency situations threatening the bank's business continuity.

**b. Adequacy of Risk Management Policies and Procedures, and Risk Limit Determination**

The adequacy of risk management policies and procedures, and the determination of risk limits, is reflected in, among other things:

- 1) Having policies, procedures, and risk limit determination aligning with BCA's risk appetite, risk tolerance, and overall strategy, by considering BCA's capital capacity to absorb risk exposure or losses, past loss experience, human resource capabilities, and compliance with regulatory requirements.
- 2) Conducting periodic evaluations and updates, involving relevant work units, to ensure compliance with regulatory requirements and external and internal developments/changes.

**c. Adequacy of Risk Identification, Measurement, Monitoring, and Control Processes, and Risk Management Information Systems**

The implementation of risk identification, measurement, monitoring, and control as part of the risk management implementation process is adequate, as evidenced by, among other things:

- 1) Identifying risks through analysis of all risk sources from the Bank's products and activities and undergoing a proper risk management process before implementation.
- 2) Periodically evaluating risk measurement systems and procedures to ensure the suitability of assumptions, measurement accuracy, and the fairness and integrity of data.
- 3) Monitoring and reporting risk exposures periodically and continuously to management by comparing actual risks with established risk limits to ensure the risk exposures are maintained within BCA risk tolerance limits.
- 4) Submitting reports, including Risk Profile Reports, Credit Portfolio Reports, and Company Work Plan Achievement Reports, to management on a regular, accurate, and timely basis.
- 5) Developing a risk management information system consistently aligning with business needs, complexity, and developments to provide accurate, complete, informative, timely, and reliable information to support the measurement, monitoring, and control of emerging risks.

#### **d. Comprehensive Internal Control System**

The objectives of implementing an effective internal control system are to ensure:

- 1) Compliance with laws and regulations as well as applicable internal policies/regulations.
- 2) Availability of complete, accurate, useful, and timely financial and management information required for sound and accountable decision-making.
- 3) Efficiency and effectiveness of BCA's business activities.
- 4) Effectiveness of the risk culture across the entire BCA organization.

##### **Internal Control System Framework**

BCA implements a three lines model framework to support reliable risk management and governance. The implementation of the three lines model principles at BCA is as follows:

##### **1) First Line**

The first line is responsible for providing products and services to customers, including managing the associated risks.

##### **2) Second Line**

The second line plays a role in providing support related to risk management, including responsibility for enterprise risk management. The second line roles are performed by the Compliance Director, Risk Management Director, Risk Management Division (MRK), Compliance Division (DCP), and the Operation Strategy and Development Group (GPOL).

##### **3) Third Line**

The third line role is performed by the Internal Audit Division (DAI) to strengthen the Company's ability to create, protect, and sustain BCA's value. This is achieved by providing independent, risk-based, and objective assurance, advice, insight, and foresight. Additionally, DAI acts as a strategic partner to management in establishing BCA as a sound banking institution by assessing the adequacy and effectiveness of governance processes, risk management, and the Company's internal controls. DAI communicates its audit reports to the President Director, the Board of Commissioners, and the Audit Committee.

In fulfilling their roles, all lines maintain regular communication and collaboration, contributing to the creation and preservation of value aligned with stakeholders' interests.

The Board of Commissioners and its subordinate committees are responsible for overseeing the implementation of internal controls and ensuring, among other things:

- 1) The existing structures and processes are adequate and available for the implementation of internal controls as part of effective governance.
- 2) The organization's objectives and activities are aligned with the interests of stakeholders.

##### **Key Components of the Internal Control System**

BCA's Internal Control is comprised of 5 key components in line with the Internal Control Integrated Framework developed by The Committee of Sponsoring Organizations of the Treadway Commission (COSO), as follows:

- 1) Management Oversight and Control Culture.
- 2) Risk Identification and Assessment
- 3) Control Activities and Division of Duties
- 4) Accounting, Information, and Communication Systems
- 5) Monitoring Activities and Corrective Actions for Irregularities

#### **6. Remuneration Policy**

BCA has established and consistently implemented a remuneration policy covering all organizational levels, including members of the Board of Commissioners, members of the Board of Directors, and all employees. This policy aligns with BCA's financial capacity and is applied prudently to accommodate the quality development of BCA employees and management.

##### **a. Remuneration Determination Procedures for the Board of Commissioners and Directors**

The remuneration for the BCA Board of Commissioners and Directors is determined based on procedures, structures, and indicators regulated in the BCA Articles of Association and the

Board of Commissioners Decision No. 116/ SK/KOM/2023 dated July 06, 2023, regarding the Remuneration Policy for the Board of Directors and Board of Commissioners. This policy refers to the following regulations:

- 1) OJK Regulation on the Implementation of Governance for Commercial Banks.
- 2) OJK Regulation No. 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks.
- 3) 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 Procedures



Based on the BCA Annual GMS resolution dated March 12, 2025, authority and power have been granted to:

- 1) The Board of Commissioners to determine the amount of salary and other allowances for members of the Board of Directors, considering recommendations from the Nomination and Remuneration Committee (KRN);
- 2) The Controlling Shareholders of BCA to determine the amount of salary and other allowances payable to members of the Board of Commissioners;
- 3) The Controlling Shareholders of BCA to determine the distribution of bonuses (tantiem) for members of the Board of Commissioners and Directors.

#### b. 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 years, are shown in the table below:

Total Remuneration and Facilities	Total Amount Received in 1 year			
	2025		2024	
	People	Million (Rp)	People	Million (Rp)
Salary, bonuses, routine allowances, tantiem, and other facilities in non-natura form	12	899,398	12	836,970
Other facilities in the form of natura (housing, health insurance, etc.) which:				
1. Entitled	-	-	-	-
2. Not Entitled	-	-	-	-
<b>Total</b>	<b>12</b>	<b>899,398</b>	<b>12</b>	<b>836,970</b>

#### c. Board of Commissioners Remuneration Structure

The remuneration packages and facilities received by the Board of Commissioners include the remuneration structure and details of nominal amounts over the last 2 years, as presented in the table below:

Total Remuneration and Facilities	Total Amount Received in 1 year			
	2025		2024	
	People	Million (Rp)	People	Million (Rp)

Salary, bonuses, routine allowances, tantiem, and other facilities in non-natura form	5	218,622	5	217,129
Other facilities in the form of natura (housing, health insurance, etc.) which:				
1. Entitled	-	-	-	-
2. Not Entitled	-	-	-	-
Total	5	218,622	5	217,129

**d. Ratio of Highest and Lowest Salary**

Ratio of Highest and Lowest Salary, which includes:

Salary Ratio	2025	2024
The ratio of the highest to lowest Employee salary	22.22	24.54
The ratio of the Board of Directors' highest and lowest salary	2.12	2.70
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	6.47	9.51
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)	73.81	118.70

**7. Provision of Funds to Related Parties and Large Exposures**

In accordance with the OJK Regulation on the Implementation of Corporate Governance for Commercial Banks, BCA is required to apply the principle of prudence in providing funds, at the very least by implementing the spread or diversification of its fund provision portfolio. The disclosure of fund provision to related parties (individuals or groups, including the Board of Directors, Board of Commissioners, BCA Executive Officers, and other related parties) and large exposures refers to the OJK Circular Letter on the Implementation of Governance for Commercial Banks, specifically the Transparency of Corporate Governance Implementation section. In providing funds to related parties and in large-scale lending, BCA consistently applies the principle of prudence, including by setting limits on lending and large exposures to specific parties and/or business groups. This is intended to prevent BCA's business failure resulting from excessive concentration of lending and to enhance the independence of BCA's Board of Directors and Board of Commissioners from potential interference by related parties, all in accordance with applicable regulations.

**Implementation of the Provision of Funds to Related Parties in 2025**

Throughout 2025, BCA has implemented its policy on fund provision to related parties, its large exposure policy, and its lending policy to the Board of Directors and Board of Commissioners in accordance which must comply with the following provisions:

- Fund provision to related parties and the plan to grant credit to certain large debtors must be decided by the credit approval official and must obtain independent approval from BCA's Board of Commissioners.
- Fund provision to related parties must not contradict applicable general credit granting provisions and procedures and must still provide reasonable returns to BCA.
- The policy for determining credit requirements for related parties, particularly regarding the setting of credit interest rates and the form and type of collateral, must follow the generally applicable credit provisions at BCA.

Routine LLL reporting to OJK or Bank Indonesia is carried out promptly. Throughout 2025, there were no violations of the LLL. Provision of Funds to Related Parties and to Individual and Group Core Debtors (Large Exposure) at BCA in 2025 were as follows:

Fund Provision	Total	
	Debtor/Group	Nominal
To Related Parties	742	14,726,311,948,729
To Main Debtors:		

1. Individual	50	270,776,036,688,293
2. Group	30	380,767,078,533,284

## 8. Transparency of Financial Condition and Non Financial Condition which Not Yet Disclosed on Other Reports

### Transparency of Financial Condition

BCA has prepared and presented reports related to financial transparency, using the procedures, types, and scope as stipulated in the applicable OJK regulations. These reports are submitted monthly, quarterly, and annually, depending on the type of report.

#### a) Annual Report

- 1) BCA prepares and submits an Annual Report annually to the OJK, shareholders, and other institutions as required or deemed necessary. The Annual Report contains the following information:
- 2) 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.
- 3) 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.
- 4) Statement of the Board of Commissioners and 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 Directors.
- 5) The Annual Report is now available on the BCA website at [www.bca.co.id](http://www.bca.co.id).
- 6) The audited Annual Financial Statement has been published on the BCA website, [www.bca.co.id](http://www.bca.co.id), as well as published through Indonesian language newspapers with widespread circulation in Indonesia.

#### b) Quarterly Publication Report

- 1) BCA has published its Quarterly Publication Report on the BCA website - [www.bca.co.id](http://www.bca.co.id) - , and also submitted the Quarterly Publication Financial Report to OJK or stakeholders in accordance with the applicable OJK Regulation.
- 2) 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 financial years.

#### c) Monthly Publication Report

- 1) BCA has announced the Monthly Published Reports on the BCA website, [www.bca.co.id](http://www.bca.co.id), including reporting the Monthly Published Financial Statements to the OJK in accordance with the applicable OJK Regulation.
- 2) Announcement of Monthly Published Reports on the BCA website in the form of Monthly Published Financial Statement maintained for at least the last 5 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. Other non-financial condition information is also made transparent through Analyst Meetings, Press Conferences, Public Exposés, Non-Deal Road Shows, and the BCA website. All disclosures are conducted in accordance with applicable provisions,
- b) Disclose ownership structure transparency in the Annual Report and on the BCA website,
- c) Disclose important and relevant information or facts regarding events, incidents, or facts of which 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 Indonesia 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 through 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](http://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 [Halo.BCA@bca.co.id](mailto:Halo.BCA@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 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 decisionmaking process,
- g) Compile and publish the Sustainability Report in accordance with the applicable provisions, as well as other information aimed at supporting information disclosure, financial education, and services to the community.

## 9. Bank's Strategic Plan

The Board of Commissioners and Directors are always actively building communication to align their views on BCA's banking business strategy. 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 process of developing, implementing, and reviewing BCA's strategy to comply with internal policies and applicable regulations.

Throughout 2025, the Board of Commissioners and Directors reviewed, monitored, and oversaw the implementation of the Company's strategy, partly through their Joint Meeting attended by relevant work units regarding the agenda item on the Strategic Plan.

BCA has drafted and submitted a strategic plan in the form of a corporate plan and a business plan in accordance with relevant regulations and provisions. Complete information regarding the presentation of BCA's Strategic Plan is stated on:

- a. Corporate's Plan; and
- b. Bank's Strategic Plan.

### Economic and Banking Sector Prospects for 2026

Domestic economic growth is expected to expand at a pace of about 5% in 2026. As a proxy for the economy, the national banking industry—both in terms of lending and funding—is expected to grow in line with Indonesia's economic expansion.

### BCA's Strategic Priorities and 2026 Projections

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

The continued growth of BCA's transaction banking business is the driver for CASA expansion. In this regard, BCA is committed to constantly innovating and improving the quality of its payment settlement products and services to continue providing optimal added value and maintaining customer satisfaction.

As transaction banking is one of the Bank's core businesses, BCA is committed to always supporting the needs of its clients, both individual and business customers. BCA continues to strengthen its digital channels with a variety of features that enable customers to conduct both financial and non-financial transactions in an efficient, secure, and convenient manner. BCA adopts hybrid banking business model, which is a combination of in-person and online services, where a human touch become a distinctive advantage in the digitalization era.

**b. Maintaining a quality loan portfolio**

In carrying out its intermediary function, BCA is committed to distribute loans in accordance with prudent banking principles. BCA constantly explores new potential sectors, including those that are in the same business cycle as the existing customers, through an in-depth analysis process to optimize industrial diversification. To maintain the quality of its credit portfolio, BCA continues to strengthen its credit monitoring and risk management functions.

To support loan processing and debtor acquisition, BCA continuously enhances its infrastructure through streamlined and optimized credit processing. In addition, BCA will continue to strive to increase debtor satisfaction with its performance by improving the capabilities of PIC Relationship, both in soft skills and hard skills.

**c. Providing of comprehensive banking solutions together with subsidiaries**

BCA consistently strives to provide comprehensive financial products and services to cater the evolving needs of its customers. One of its initiatives is through bolstering synergy with its subsidiaries engaged in financing, digital banking, Islamic banking, securities, and insurance business. BCA supports the growth of its subsidiaries by increasing their capacity and capabilities to become become major players in their respective business lines.

**2025 TARGET ACHIEVEMENTS**

A summary of the financial performance achievements in 2025 compared to the targets is as follows.

**Achievements vs Target**

	<b>2025 Target</b>	<b>2025 Achievement</b>
Loan Growth	6% - 8%	7.7%
Cost of Credit (CoC)	~0.3%	0.5%
Cost to Income Ratio (CIR)	33% - 34%	30.7%
Return on Asset (ROA)	3.6% - 3.8%	3.9%
Return on Equity (ROE)	21% - 23%	23.3%

**10. Shareholders Aspects**

In connection with the implementation of Article 107 of OJK Regulation on the Implementation of Governance for Commercial Banks and OJK Circular Letter No. 14/SEOJK.03/2025 concerning the Implementation of Good Corporate Governance for Commercial Banks, BCA shareholders also have a role in supporting the implementation of sound business activities and maintaining BCA's business continuity. BCA considers the interests and rights of shareholders, including the protection of minority shareholders.

Policies related to shareholder aspects as stipulated in the Corporate Governance Guidelines includes:

- BCA's rights and obligations
- BCA shareholders rights and obligations

**BCA's Rights and Obligations**

BCA has the following rights:

- Shareholders' compliance toward BCA's Articles of Association and applicable laws and regulations.
- Implementing the GMS decisions that have been legally approved and are binding upon all

- shareholders.
- c. Protecting BCA's interests and assets against shareholder actions that potentially detrimental to the bank.
  - d. Maintaining the confidentiality of BCA's strategic information against any party, except for mandatory disclosures under applicable law.
  - e. Conducting business activities in accordance with BCA's vision, mission, and articles of association.

BCA's obligations include, among others:

- a. Protecting shareholder's rights in accordance with BCA's articles of association and applicable laws and regulations.
- b. Ensuring fair treatment for all shareholders through independent and impartial actions, avoiding favoritism toward specific shareholders.
- c. Providing timely and accurate company information to shareholders, excluding confidential matters.
- d. Facilitating shareholder and stakeholder participation and managing communication throughout the process. Details regarding stakeholder communication are available in the Disclosure and Stakeholder Information Chapter of these Corporate Governance Guidelines.
- e. Maintaining and administering the register of shareholders in a neat, organized, systematic, and orderly manner in compliance with laws and regulations.

### **Rights and Obligations of BCA Shareholders**

BCA shareholders have the following rights:

- a. Regarding the GMS:
  - 1) To receive publication of GMS materials in accordance with applicable regulations.
  - 2) To receive complete explanations and accurate information regarding the implementation of the GMS.
  - 3) To attend the GMS.
  - 4) To vote at the GMS.
  - 5) To have the opportunity to raise questions or provide opinions on each GMS agenda item.
- b. To receive equal treatment from BCA.
- c. To receive dividend payments in accordance with applicable procedures and provisions.
- d. To exercise other rights and authorities based on the articles of association and applicable laws and regulations, including the right to participate in authorization of capital increases, amendments to BCA's articles of association, and the transfer of all or part of assets resulting in the sale of BCA's ownership.

BCA shareholders have obligations, including:

- a. Complying with BCA's Articles of Association, applicable laws and regulations, and GMS resolutions.
- b. Exercising their rights in good faith and without harming the interests of BCA or other shareholders.

Shareholders participate in supporting the implementation of BCA's healthy business activities and maintaining the continuity of BCA's business activities.

## **11. Implementation of The Anti-Fraud Strategy**

BCA has an Anti-Fraud Strategy Implementation Guideline as last updated through the Board of Directors' Decision No. 009/SK/DIR/2025 dated January 20, 2025 concerning Adjustments to the Anti-Fraud Strategy Policy (hereinafter referred to as the "Anti-Fraud Strategy Implementation Guideline"). The Anti-Fraud Strategy Implementation Guideline refers to OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions.

The Anti-Fraud Strategy Implementation Guidelines demonstrate BCA management's commitment to preventing fraud by implementing an effective and sustainable fraud control system. This fraud control system guides BCA in determining steps to prevent, detect,

investigate, and monitor fraud incidents.

In accordance with the OJK regulation, BCA defines fraud as an intentional act of deviation and/or omission carried out to deceive, cheat, or manipulate BCA, customers, or other parties, which occurs within the BCA environment and/or uses BCA facilities, thereby causing BCA, customers, or other parties to suffer losses and/or the perpetrator of fraud and/or other parties to gain direct or indirect benefits.

Types of acts classified as fraud are:

- a. Corruption, includes:
  - 1) conflicts of interest detrimental to BCA and/or customers;
  - 2) bribery;
  - 3) unauthorized receipts; and/or
  - 4) extortion;
- b. Misappropriation of assets, includes:
  - 1) misappropriation of cash;
  - 2) misappropriation of inventory; and/or
  - 3) misappropriation of other assets;
- c. Financial statement fraud includes:
  - 1) overstating net assets and/or net income; or
  - 2) understating net assets and/or net income;
- d. Fraud;
- e. Leakage of confidential information;
- f. Other actions that may be equated with fraud in accordance with statutory regulations.

In developing and implementing an effective Anti-Fraud Strategy, BCA has considered the following:

- a. internal and external environmental conditions;
- b. complexity of business activities;
- c. type of fraud;
- d. risk of fraud; and
- e. adequacy of required resources

In order to support the implementation of the AntiFraud Strategy, BCA has established an Anti-Fraud Bureau tasked with implementing the Anti-Fraud Strategy at BCA. The Anti-Fraud Bureau is independent and reports to the Director of Risk Management. The Anti-Fraud Bureau has a line of communication and reports to the Board of Commissioners and maintains a line of coordination with the Head of Risk Management Division.

### **Objectives**

The implementation of the Anti-fraud policy at BCA aims to:

- Foster an Anti-Fraud culture throughout the BCA organization.
- Increase awareness and concern for fraud risks in BCA operations.
- Remind BCA operational personnel to always comply with applicable procedures and regulations.

The Anti-fraud Strategy consists of 4 pillars as follows:

- a. Prevention  
Contains tools to reduce the potential risk of fraud, which at a minimum includes anti-fraud awareness (such as the preparation and dissemination of an anti-fraud declaration, employee awareness programs, customer awareness programs), vulnerability identification, and “know your employee” procedures.
- b. Detection  
Contains tools to identify and detect fraud incidents in BCA’s business activities, which at a minimum include whistleblowing policies and mechanisms, surprise audits, and a surveillance system.
- c. Investigation, Reporting, and Sanctions

Contains steps for investigations, reporting systems, and the imposition of sanctions for fraud incidents, which at a minimum include investigation, reporting, and the imposition of sanctions.

d. Monitoring, Evaluation, and Follow-up

Contains steps to monitor, evaluate, and follow-up on fraud, which at a minimum include monitoring, evaluation, and follow-up.

### **Implementation and Internalization Anti-Fraud Declaration**

In line with BCA's commitment to implementing the Anti-Fraud Strategy, BCA has formulated an Anti-Fraud Declaration which states the management's commitment to implementing a "Zero Tolerance" policy toward fraud. This is achieved through the effort of building strong pillars to continuously prevent, detect, investigate, and monitor existing fraud risks, indications, and incidents.

The content of BCA's Anti-fraud Declaration (based on the Board of Directors' Decision No. 127/SK/DIR/2025 dated July 11, 2025, regarding the Anti-Fraud Declaration and Integrity Pact) is as follows:

*"In order to strengthen the internal control system, the implementation of Good Corporate Governance, and as a further implementation of the OJK Regulation on the Implementation of Anti-Fraud Strategies for Financial Services Institutions, PT Bank Central Asia Tbk hereby commits to:*

- a) Conduct business fairly, honestly, and transparently;*
- b) Avoid doing business with third parties who were not committed in accordance with the Company's policy; and/or*
- c) Provide consequences for violation toward policies and commitments.*

*Let all levels of the BCA organization, customers, and work partners collaborate to create an anti-fraud culture and manifest a fraud free and safe BCA."*

### **12. Implementation of Sustainable Finance**

In accordance with OJK Regulation No. 51/POJK.03/2017 concerning the implementation of sustainable finance for financial service institutions, issuers, and public companies and OJK Regulation on the Implementation of Governance for Commercial Banks, BCA is required to implement sustainable finance in its business activities and develop a sustainable finance action plan.

As a bank, BCA is required to carry out business practices and investment strategies by considering, implementing, and integrating environmental, social, and governance values in support of at least:

- a. Sustainable business ecosystems,
- b. Product development,
- c. Transactions,
- d. Financing services for sustainable activities and transition financing,
- e. Development of sustainable finance programs and implementation of environmentally conscious bank operations, and
- f. Social and community empowerment, in the implementation of sustainable finance.

The implementation of sustainable finance including the implementation of social responsibility, includes information related to a summary of the sustainable finance action plan implemented by BCA is listed in the BCA Sustainability Report, which is accessible to all stakeholders on the official BCA website.

### **13. Internal Fraud Violation Data for 2025**

The disclosure of deviations (internal fraud) is carried out based on the OJK Regulation concerning the Implementation of Governance for Commercial Banks and Chapter XXIII item 5 of OJK Circular Letter No. 14/SEOJK.03/2025 concerning the Implementation of Governance

for Commercial Banks. The report on these deviations consists of the form of deviation (internal fraud), specifically fraud committed by members of the Board of Directors, members of the Board of Commissioners, permanent employees, non-permanent employees (honorary staff), and/ or outsourced personnel. The nominal amount of deviations disclosed are those exceeding Rp100,000,000.00 (one hundred million Rupiah).

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 Employees and Outsourced Workers	
	2025	2024	2025	2024	2025	2024
Total <i>Fraud</i>	-	-	2	3	3	3
Resolved	-	-	1	2	1	3
In the process of being resolved internally at BCA	-	-	1	1	-	-
Yet to be resolved	-	-	-	-	-	-
Has been followed up through legal process	-	-	-	-	2	-

#### 14. Legal Cases 2025

Throughout 2025, criminal cases in court based on reports filed by BCA against customers, employees, or other third parties included cases involving alleged electronic information crimes, fraud, embezzlement, theft, forgery, land/enclosed yard seizure, and property damage, with no cases involving material losses exceeding Rp1 billion.

Meanwhile, there were no/nil criminal cases in court initiated by customers, employees, or other third parties against BCA.

No.	Legal Cases	Cases	
		Civil Law	Criminal Law
1.	Concluded Cases (with final and binding legal decisions)	222	6
2.	Ongoing Legal Cases	200	1
	Total	422	7

#### 15. Conflict of Interest Transactions

Throughout 2025, members of the Board of Commissioners and Board of Directors managed potential conflicts of interest as regulated by prevailing provisions; for instance, if a member of the Board of Commissioners or Directors had a conflict of interest, that member did not participate in the decision-making process. Throughout 2025, there were no conflict of interest transactions harming BCA or reducing BCA's profits.

No.	Name and Position of the Party Having a Conflict of Interest	Name and Position of Decision Maker	Type of Transactions	Transaction Values (Million Rupiah)	Descriptions <sup>*)</sup>
There were no Conflict of Interest transactions in 2025					
*) Not in accordance with applicable systems and procedures					

## 16. 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 2025, BCA conducted a repurchase of BCA shares previously issued and listed on the Indonesia Stock Exchange (IDX) (“Buyback”). This action was taken to support regulatory initiatives in maintaining stock market stability on the IDX. The Buyback was implemented in reference to the following regulations:

- a. OJK Regulation No. 13 of 2023 concerning Capital Market Performance and Stability Policies during Significantly Fluctuating Market Conditions (“OJK Regulation No. 13/2023”)
- b. OJK Regulation No. 29 of 2023 concerning the Repurchase of Shares Issued by Public Companies (“OJK Regulation No. 29/2023”)
- c. OJK Letter No. S-17/D.04/2025 dated March 18, 2025, regarding Implementation Policies for the Repurchase of Shares Issued by Public Companies during Significantly Fluctuating Market Conditions (“OJK Letter No. S-17/D.04/2025”)
- d. OJK Letter No. S-102/D.04/2025 dated September 17 regarding the Policy on the Implementation of Share Buybacks Issued by Public Companies in Conditions of Significant Market Fluctuations (“OJK Letter No. S-102/D.04/2025”)

The Buyback was implemented in two periods through the following mechanisms:

Description	Buyback Period 1	Buyback Period 2 <sup>1)</sup>
Buyback Period	March 26, 2025, to May 15, 2025	October 22, 2025, to January 19, 2026
Disclosure of Buyback Plan Information	March 25, 2025	October 20, 2025
Maximum Buyback Value	Rp1,000,000,000,000 (one trillion Rupiah)	Rp5,000,000,000,000 (five trillion Rupiah)
Total Shares Repurchased	28,317,500 shares	233,699,300 shares
Average Purchase Price	Rp8,828.19	Rp8,140.90
Note: 1) as of December 31, 2025		

The following are the movements and positions of treasury stock as of December 31, 2025:

Description	Total Shares
Treasury Stock as of December 31, 2024	0
Treasury Stock Movement during 2025	262,016,800
Treasury Stock as of December 31, 2025	262,016,800
Total Outstanding Shares	123,275,050,000
Total Outstanding Shares excluding Treasury Stock as of December 31, 2025	123,013,033,200

During 2025, BCA did not conduct any bond buyback.

## 17. Funding of Social and Political Activities

### Funding Social Activities

BCA constantly innovates to present effective and relevant solutions in addressing the environmental and social challenges faced by the community. This social and environmental responsibility is carried out comprehensively under the ‘umbrella’ of Bakti BCA, which focuses on the development of individuals, communities, and ecosystem preservation..

Bakti BCA activity program is built around 5 major pillars:

- a. Bakti Pendidikan
- b. Bakti Kesehatan
- c. Bakti Bisnis Unggul
- d. Bakti Budaya

e. 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 2025 is set forth in the separate 2025 BCA Sustainability Report, which is an integral and inseparable part of this Annual Report.

**Funding Political Activities**

BCA is committed to not providing funds for political activities, both in 2025 and in previous years. BCA did not make any other contributions or expenditures in 2025 related to:

Type	2025	2024	2023	2022
Lobbying, interest representation, or similar activities	0	0	0	0
Referendums, campaigns, and/or voting for the election of members of political organizations/candidates, whether local, regional, or national	0	0	0	0
Contributions and other expenses related to political activities..	0	0	0	0
Note: Disclosed in Rupiah				

**B. Self-Assessment on the Implementation of Integrated Corporate Governance Financial Year 2025**

**Results of the Self-Assessment on the Implementation of Integrated Corporate Governance**

Rating		Definition of Ranking
Semester I	1	The Financial Conglomerate has implemented Integrated Governance <b>very well</b> in general. This is reflected in the very adequate compliance with the Integrated Governance principle. If there are weaknesses in the implementation of Integrated Governance, these are generally insignificant and can be immediately corrected by the Main Entity and/or Financial Services Institutions
Semester II	1	The Financial Conglomerate has implemented Integrated Governance <b>very well</b> in general. This is reflected in the very adequate compliance with the Integrated Governance principle. If there are weaknesses in the implementation of Integrated Governance, these are generally insignificant and can be immediately corrected by the Main Entity and/or Financial Services Institutions

