BUMN UNTUK INDONESIA

BNI
Serving the Country, the Pride of the Nation

Transforming the Future, Empowering Indonesia



PT Bank Negara Indonesia (Persero) Tbk

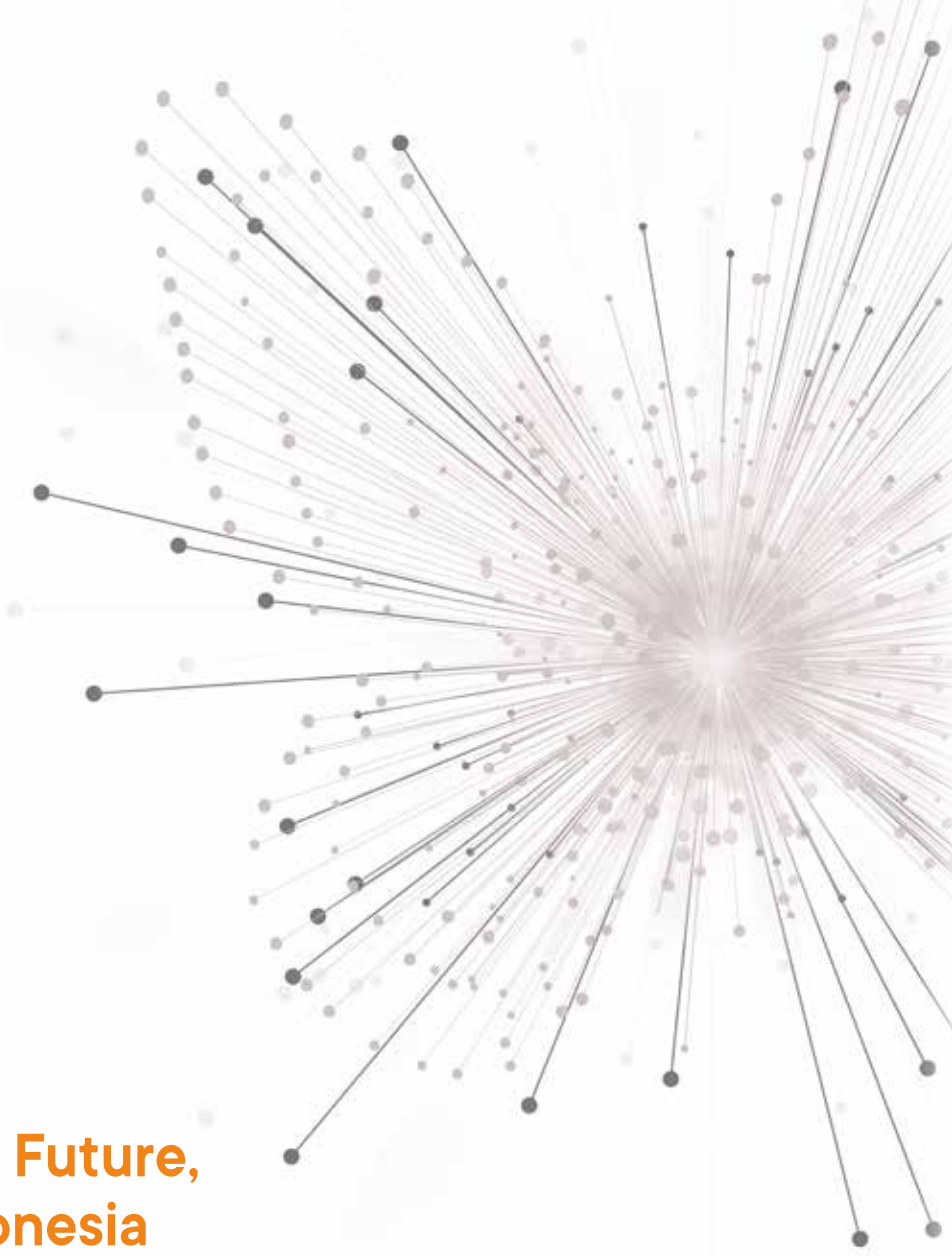
2024 Annual Report

Disclaimer and Limitation of Liability

The 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk ("BNI") is prepared by referring to the Financial Services Authority ("FSA") Regulation No. 29/POJK.04/2016 concerning the Annual Report of Issuers or Public Companies, OJK Circular Letter No. 16/SEOJK.04/2021 concerning the Form and Content of Issuers or Public Companies' Annual Report, and OJK Circular Letter No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank's Reports and Minister of State-Owned Enterprise (SOE) Regulation No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of SOEs. In addition, BNI also prepared a separate Sustainability Report that explains the banking business practices sustainability strategies and initiatives being developed, in accordance with OJK Regulation No. 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies. [ACGS B.4.7]

This Annual Report contains statements of financial conditions, operations results, projections, plans, strategies, policies, and objectives of BNI. The prospective statements in this Annual Report are prepared based on various assumptions about the latest condition, the future condition, and the business environment where BNI performs its business activities. These statements are subject to prospective risks, uncertainties, and could cause actual results that differ materially from the reported results. [ACGS C.8.3]

This Annual Report contains the words "BNI", the "Limited Liability Company", or "Company" that are defined as PT Bank Negara Indonesia (Persero) Tbk. Sometimes the word "we" is also used to make it easy to designate BNI in general. This Report is presented in two languages, Indonesian and English, and can be viewed and downloaded on the official website of BNI: www.bni.co.id.



Transforming the Future, Empowering Indonesia

BNI's long-standing commitment to empowering various levels of Indonesian society is demonstrated by its role in the country's growth over the past seven decades. BNI's extensive experience serving customers also provides the ability to navigate an ever-changing era.

BNI has grown not only by providing financial services to various segments, but also by expanding its global reach and digital innovation, making it a trusted partner in various aspects of customer finances. BNI's ongoing transformation since 2021 has been able to strengthen the company's fundamentals, improve good corporate governance practices, and encourage sustainable growth.

2024 marked a significant milestone in BNI's journey to improve banking services by leveraging the most recent digital developments. The release of the latest versions of wondr and BNIdirect, which are intended to improve customer experience and include a variety of relevant new features, is a watershed moment in this year's digital transformation.

As a bank that represents Indonesia around the world, BNI always optimizes services for Indonesian businesses abroad, MSMEs from the Indonesian diaspora, and Indonesian corporations looking to expand globally. These various strengths will help BNI make progress both now and in the future.

Theme Continuity



2020

Uniting Energy to Revive the Country

In a situation where Indonesia still struggled to deal with the pandemic, BNI as one of the drivers of the national economy was determined to unite the energy to stem the spread of the pandemic while simultaneously reviving the country from the pandemic's negative impacts.



2021

Jumping Higher for the Country

To deal with the COVID-19 pandemic which is not over yet requires an endless fighting spirit. The Indonesian Badminton National Team's success in bringing home the Thomas Cup after 19 years certainly has inspired many parties. The theme of BNI's 2021 Annual Report is "Jumping Higher for the Country" and uses visuals of badminton players. The purpose is to portray BNI's spirit and performance as we continue to focus on jumping and transforming our digital and global capabilities to achieve a superior performance and become the pride for the country. This theme follows BNI's 75th Anniversary theme "Jump Higher." In addition, BNI should be proud of being appointed by the SOEs Ministry as the SOE Participating in the Coaching of Badminton Sports.



2022

BNI for Stronger Indonesia

The COVID-19 pandemic has left various interesting stories, one of which is the growing awareness of the importance of sustainability. The holding of the G20 international events in Bali, Indonesia, in 2021-2022 have emphasized the importance of Indonesia's position in the theme of sustainability at the global level, both Indonesia's role in the post-COVID-19 recovery and the Indonesian Government's strong desire to achieve net zero emission in 2060. The theme of the 2022 BNI Annual Report is also related to all the great intention. "Recover Together, Recover Stronger" is the theme of the G20 Presidency, in which Indonesia invites the whole world to work hand in hand, support each other to recover together and grow stronger and more sustainable. In line with the theme of the G20 Presidency, BNI and all stakeholders involved in its business chain strive to create a more resilient Indonesia. The manifestation is expressed both in terms of the Bank's performance, the issue of Green Bonds, as well as various important efforts with stakeholders to create an established and sustainable banking industry.





2023

From Local to Global

BNI's Corporate Transformation has clear direction and objectives. The gradual and continuous implementation of transformation, which will navigate the journey along a predetermined route, has increasingly delivered results. In the midst of economic challenges, as well as increasingly dynamic domestic and global conditions, BNI Corporate Transformation continues to be implemented and produces positive results. The shareholders' aspiration for BNI to become a global bank is one of the goals of this transformation. Despite the competitive competition, BNI is aiming to improve its business processes so that it can be present and provide services at an international level. With such a broad target market, of course BNI is required to answer existing challenges. Through this transformation, BNI strives to provide financial services that are agile, adaptive, accountable and competitive with excellence.

2024

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BNI Competitive Advantage [ACGS C.2.3]

BNI has been seeking to make the best contribution to push economic growth and nation building in order to create a prosperous society as a whole. The Bank's rich history, strong finances, excellent human resources and reliable technology, allow BNI to make sustainable transformation with the Indonesian people while bringing to them a continuous array of superior financial, digital and international service solutions.



Excellent Reputation and Experience in Corporate and Institutional Banking

BNI's DNA is as corporate banking with international network excellence, and this is embedded through extensive experience and a global reputation as a national bank that actively supports Indonesian businesses in many economic cycles. Loans to the corporate segment are still the segment with the largest lending share in BNI, with an average share of 53.6% over the last 3 (three) years. By December 2024, BNI's corporate loans composition reached 56.8%. In the corporate segment, BNI focuses on expanding to superior debtors who are key industry players and optimizing cooperative relationships with institutions.

National Bank with Global Capacity

BNI has the widest network of offices overseas, located in world business and financial centers, including Singapore, Hong Kong, Tokyo, New York, London, and Seoul. In addition, BNI also has 3 representative offices in Osaka, Amsterdam, and Sydney as well as a Limited Purpose Branch in Singapore. Supported by strategic alliances and a network of overseas correspondent banks, BNI has a global reputation as a national bank that actively bridges business and investment from Indonesia to overseas companies and vice versa. In line with the Indonesian Government's mandate for BNI to become an Indonesian bank with global capacity, BNI continues to optimize its competitive advantage to facilitate businesses, including corporations and Small and Medium Enterprises (SME) exporters, to enter the global market, as well as serve transaction and service needs, and Indonesian diaspora finance services. The Representative Office in Sydney, Australia, became the latest overseas office network opened by the Company on September 5, 2024. This representative office is Bank Indonesia's first office in Australia, established to facilitate trade and investment between Indonesia and Australia, and support the Indonesian business community in Australia.

Comprehensive and Competitive Digital Ecosystem

BNI digital financial services are available through a one stop solution digital financial services strategy, to answer the needs for end-to-end consumer & retail and business banking segment customers. Product champions of BNI digital services include wondr by BNI for individual customers and BNIdirect for business and institutional customers.

In 2024, BNI launched the wondr by BNI application to realize its transformation in presenting innovative banking applications for individual customers to facilitate transactions as well as planning for a more optimal future for the community. With 3 Financial Dimensions (Transaction, Insight, and Growth) which provide a better user experience in making transactions, financial recap, comprehensive asset checks, paying bills, and sending money abroad. Until the end of 2024, wondr by BNI has a total of 5.4 million users with a portion of active users twice as high as the active rate of the previous application (BNI Mobile Banking).

Meanwhile, for corporate, institutional and MSME customers, in the same year BNI also launched new capabilities from BNIdirect. BNIdirect is a digital platform designed to provide complete and flexible transaction solutions.

By the end of 2024, BNIdirect had surpassed 173 thousand users.

On the other hand, BNI is also developing API (Application Programming Interface) services that provide seamless connectivity between customer applications and BNI's digital ecosystem.To date, BNI has 280 regulator-approved API services, including services such as disbursement, collection, payment, account information and digital account opening. In addition to financial services, BNI's API also includes non-financial features, such as the Know Your Customer (KYC) process and data for digital lending.

The Bank with the Leading Sustainable Financial Practices in Indonesia

In 2024, BNI continued to realize its commitment to supporting sustainable finance by internalizing sustainable finance principles in its values, work culture, strategies, operational policies, and operational systems and procedures. BNI implemented sustainable finance principles in the form of increasing sustainable portfolios and financing for environmentally friendly sectors, as well as proactive measures to reduce emissions from operations and businesses. BNI proactively introduced sustainability-linked loans (SLL), with one of the main aspects of SLL being the provision of incentives for customers who proved capable of improving the Environmental, Social, & Governance (ESG) aspects of their business. By the end of 2024, the SLL portfolio has reached IDR6.0 trillion. To assist debtors with their energy transition, BNI has positioned itself as a debtor partner through the BNI ESG Sustainability & Transition (BEST) Event and TKBI Technical Assistant Workshop for debtors in the energy sector. Furthermore, in relation to sustainable finance practices, BNI currently has an MSCI ESG Rating at BBB, which is associated with strong workforce management, corporate behavior, and data privacy & security, and maintains a Medium Risk from the Sustainalytics ESG Risk Rating. [ACGS B.4.3]

Widespread Domestic Office Network to Reach All Levels of Society

By the end of 2024, BNI operated 1,780 outlets (Branch Office and Sub Branch Office), 13,388 ATMs (exclude ATM overseas), and 213,370 Branchless Banking agents (BNI Agen46) throughout Indonesia. When managing the office network, BNI pays attention to effective and efficient deployment, as well as the transfer of customer banking transactions to digital channels, especially BNI Mobile Banking, which offers an easy, fast, safe, and comfortable transaction experience. Currently, BNI has under development the flagship, digital-first, and thematic outlet formats, which offer a faster, unique, and more complete banking experience for customers. To support financial inclusion, BNI Agen46 can be found in 34,241 sub-districts/villages throughout Indonesia, including areas categorized as Frontier, Remote, and Disadvantaged (3T). By the end of 2024, BNI Agen46 recorded a transaction volume of IDR51.97 trillion with total transactions reaching 79.35 million.

Milestones

1946

The establishment of PT Bank Negara Indonesia (Persero) Tbk as the first state-owned bank, functioning as a central bank and a commercial bank.

1950

BNI as a development bank was given the right to act as a foreign exchange bank.



1955

BNI converted to a commercial bank and BNI opens its first overseas branch in Singapore.

1960

BNI supported the Indonesian economy and introduced various banking services such as Floating Banks and Mobile Banks.

1968

As a commercial bank with the name "Bank Negara Indonesia 1946", BNI was given the task of improving the economy of the people of Indonesia and participated in the national economic development by empowering various industrial sectors in Indonesia.

1986

BNI conducted operational restructuring and corporate reforms, including developing its vision and mission and Performance Improvement Program (PIP).

1989

BNI launched its new logo "the ark of sailing in the middle of the ocean" as a reflection and expression of the Company's expectation.

1997

The monetary crisis hit Asia and Indonesia. Like other banks, BNI was also affected by the crisis, as reflected in the decline in financial performance indicators.

1999

BNI obtained additional capital from the Government through the bank recapitalization program. BNI succeeded in obtaining ISO 9002 certificate in recognition of quality standards including the Joint Processing Unit (UPB).

2004

BNI launched its new corporate logo and identity related to efforts to build a firm image of the Company in the face of competition.

2007

BNI issued new shares listed on the Jakarta and Surabaya Stock Exchanges at the same time as the government share divestment program. With the completion of both programs, public ownership increased to 23.64%.

2008

Under a new Management team, BNI stepped up in the midst of the global economic crisis, reinforcing its financial foundation through 5 (five) key strategies: adequacy of reserves, improving the quality of assets, focusing on profitability, creating sustainable business models and maintaining efficient cost structures.

2009

BNI shareholders agreed to spin-off BNI Syariah business units as an independent business entity.

2010

BNI issued new shares through a Rights Issue so that public ownership increased to 40%.

2012

BNI issued Global Bonds through its London branch office worth USD500 million. BNI's Global Bonds were registered at the Singapore Stock Exchange.

2013

BNI joined a strategic partnership with Sumitomo Life Insurance Company that purchased new shares issued by PT BNI Life Insurance worth IDR4.2 trillion.

2014

BNI's Net Income for the first time broke the double-digit figure (IDR10.8 trillion), as one result of BNI's transformation programs implemented since 2008.

2015

To adapt to the changing dynamic business environment, to meet the needs of all stakeholders' interests, and to align with regulations related to management for financial conglomerate institutions, BNI restated its vision: "Becoming a Superior Financial Institution in Service and Performance."

2016

For the second time BNI achieved a double-digit profit of IDR11.4 trillion with better fundamentals, indicated by a coverage ratio of 146% and CAR of 19.4%.

2017

BNI Sustainable Bonds I Phase I Year 2017 were issued with a value of IDR3 trillion for a period of 5 years with a coupon of 8% per annum. BNI Bonds were published on July 11, 2017 and listed on BEI on July 12, 2017.

2018

BNI Subordinate I Medium Term Notes (MTN) Year 2018 were issued with a value of IDR100 billion for a period of 5 years with a fixed interest rate of 8% per annum. The MTN were registered at FSA, effective June 8, 2018.

2019

In 2019, BNI became the first Government Bank to launch Digital Account Opening through its mobile banking application. Negotiable Certificates of Deposit (NCD) with a value of IDR2.39 trillion were issued on September 25, 2019.

2020

BNI restated its vision "To become a Financial Institution that excels in sustainable service and performance" and restated its mission "Strengthening excellent service and digital solutions to all customers, as the primary partner of choice" and "Strengthening international services to support the needs of global business partners." The purpose was to strengthen BNI's excellence in international business through overseas and domestic networks, partnership cooperation, and digital banking development in response to challenges and competition. To support the formation of a national Islamic bank with global capacity, BNI together with Bank BRI and Bank Mandiri signed a merger agreement between BNI Syariah with Mandiri Syariah, and BRI Syariah.

2021

- BNI issued Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) on the Indonesia Stock Exchange for USD500 million with an interest rate of 3.75%, as well as Additional Tier 1 ("AT-1") Perpetual Non-Cumulative Capital Securities on the Singapore Stock Exchange for USD600 million with a yield of 4.3% p.a. The AT-1 Capital Securities issue was monumental as BNI became the first bank in Indonesia to issue Additional Tier 1 capital instruments.
- BNI also strengthened its vision, from the previous "To become a Financial Institution with Sustainable Service and Performance Excellence," to "To become a Superior Financial Institution with Sustainable Service and Performance Excellence." The word "Superior" has been prefixed with "Most," showing BNI's commitment to becoming the most superior.
- BNI divested its stake in PT Bank BNI Syariah, which was merged with PT Bank Mandiri Syariah and PT Bank BRI Syariah Tbk to become PT Bank Syariah Indonesia Tbk ("BSI") Holding.
- BNI Securities Pte. Ltd. ("BSPL"), a subsidiary of PT BNI Sekuritas, has officially started operations in Singapore.

2022

- BNI acquired PT Bank Mayora. Bank Mayora will be transformed into a digital bank that supports the development of BNI's digital solutions focusing on the MSME (Micro, Small and Medium Enterprises) segment.
- Establishment of PT BNI Modal Ventura, referred to as "BNI Ventures," as BNI's strategy to support the development of the digital ecosystem in Indonesia.
- Additional capital participation in PT Bank Syariah Indonesia Tbk, where BNI's share ownership in BSI was diluted to 23.24%.
- Issuance of PT Bank Negara Indonesia (Persero) Tbk Green Bond I Year 2022 with a principal amount of IDR5 trillion. This bond is the first Green Bond product in Indonesia issued in Rupiah.

2023

- October 10, 2023, BNI carried out a corporate action in the form of a stock split with a ratio of 1:2 effective on the Indonesian Stock Exchange. This corporate action was carried out to increase demand for BNI shares by expanding the investor base.
- The market responded positively to this corporate action, as evidenced by the strengthening of BNI's share price, so that BNI's market capitalization value at the end of 2023 reached IDR200.5 trillion, an increase of 16.5% compared to the end of 2022 of IDR172.0 trillion. This market capitalization value is the highest in BNI's history since it was listed on the Indonesian Stock Exchange.

2024

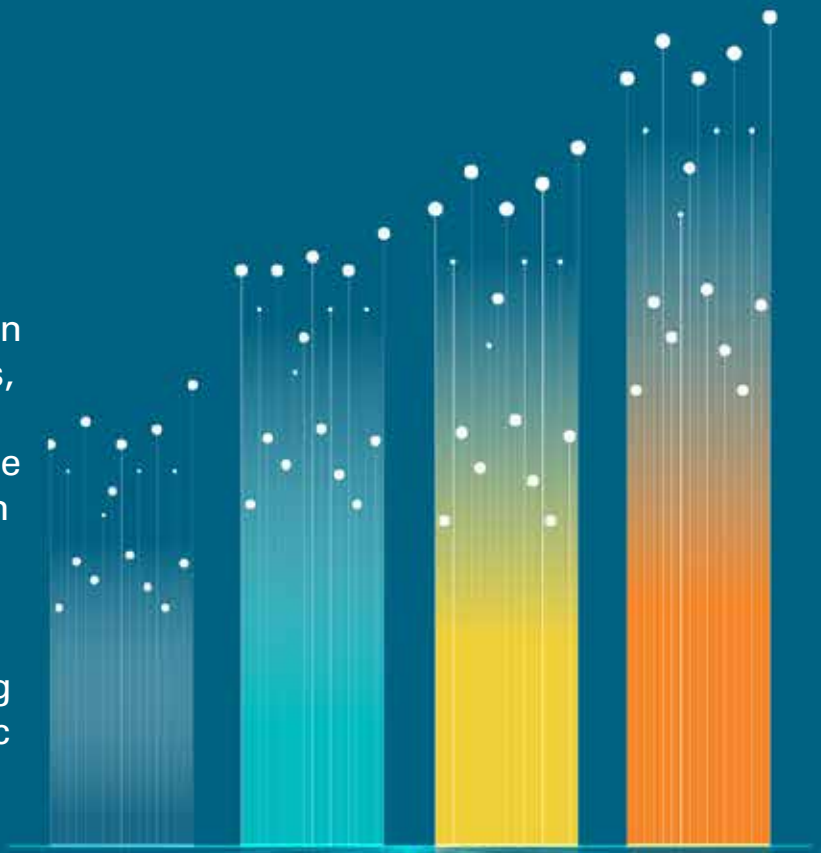
- On July 5 2024, BNI launched the "wondr by BNI" banking application. The launch of "wondr by BNI" is a realization of BNI's transformation in presenting banking application innovations to facilitate transactions as well as more optimal planning for society's future.
- BNI is transforming the BNIdirect wholesale digital platform as a strategic step to optimize wholesale digital services. This transformation brings together various digital transaction services that were previously available on different separate platforms into one comprehensive and integrated platform, providing efficiency and ease of access for customers.
- BNI relocated its Singapore overseas office (KLN) to a more strategic location. In addition to relocation, BNI obtained the right to name the building BNI Tower, effective July 23, 2024. The presence of this new building is expected to make it easier for customers to reach BNI financial services.
- As a form of BNI's commitment to expanding the reach of banking services, on September 5 2024, BNI inaugurated a BNI Representative Office in Sydney, Australia. BNI is the first bank from Indonesia to open an office in Australia.
- As part of its strategy to diversify funding sources and drive business growth, BNI has issued Global Bonds valued at USD500 million (approximately IDR7.9 trillion) as part of its Euro Medium Term Note (EMTN) program. The strong investor demand is evident in the oversubscription of up to 6.4 times during the initial pricing guidance (IPG).

wondr by BNI
jadiin maumu.

Highlight 2024:

BNI Transformation

In an effort to carry out an end-to-end business transformation in all aspects, BNI has implemented its 6-wave BNI Corporate Transformation Program from April 2021 to April 2024. After the BNI Corporate Transformation Program period ended, the transformation proceeded continuously to align BNI's Long-Term Plan/Corporate Plan 2024 - 2028 with its 2028 aspirations, which is to become "The Bank with Best Technology & People at the Core to Serve You. " The strategy direction has a unique value proposition that BNI plans to build in the future with 3 (three) focus areas: Productivity, Platform, and Proposition. Achieving these aspirations has some strategic initiatives in the pipeline.



Business Productivity

Strengthening Business Networks through Outlet Optimization

Transformation of BNI channels/outlets and e-channels to improve customer experience and optimize the Frontliner functions at outlets to support outlet business achievements through service and product education activities, upselling/cross-selling, referrals of BNI and Subsidiary products, and follow-up data leads.

BNI as an Orchestrator of Indonesian Business to the Global Market

BNI Xpora reinforces BNI's role as a global bank since it gives access for Indonesian SMEs to the global market through overseas offices, international partners, training, mentoring, and flexible financing solutions, and assists them with business expansion and exports through the Go Productive, Go Digital, and Go Global pillars.

Digital & Operation

End-to-end digitization of sustainable credit business processes to support quality business growth

End-to-end credit tools enhancement through the development of credit tools integrated with core banking and surroundings to improve credit quality, efficiency, and effectiveness of work in the credit process with due priority of prudential banking.

The development of a new Digital Platform is carried out as part of efforts to improve customer experience

Development and enhancement of banking transaction products/features/ channels that focus on customer convenience and a reliable and secure system.

Human Capital

Strengthening Human Capital to increase productivity through changes in behavior and work rhythm in the Commercial Business Center (CMC), Regional Office, Retail Productive Business Center (RCC), and Branch Office

Strengthening human capital through behavioural changes and work rhythm in CMC, Regional Office, Branch Office, and RCC, measured based on the leading indicator matrix, to encourage more militant and in-the-market RM as well as hands-on leaders with a high sense of ownership.

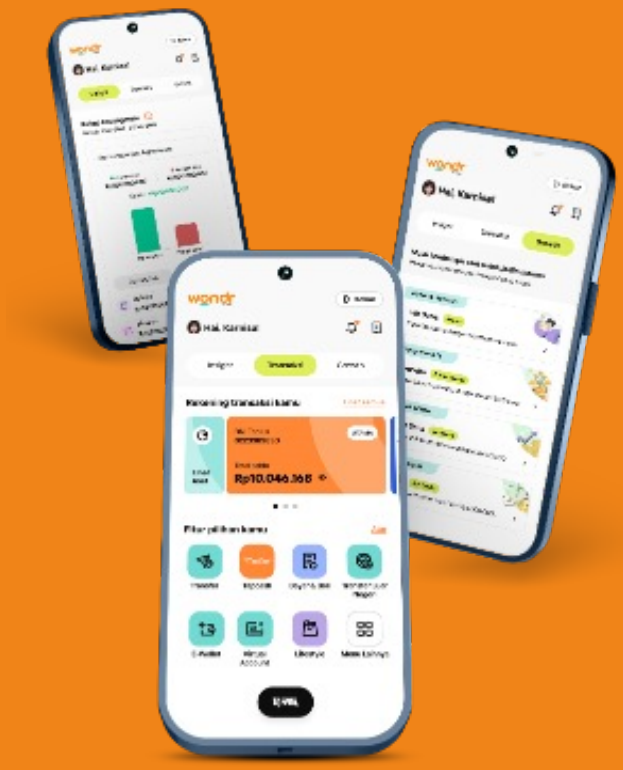
Highlight 2024:

wondr by BNI

In July 2024, or on July 5, 2024 to be precise, BNI released wondr by BNI, a new mobile banking app that features the latest global standards technology, offering more personalized and need-based services that assist customers in managing their finances and planning for the future. The tagline of wondr by BNI, "Jadiin maumu" (freely translated as just do it or do as you wish), is interpreted as an app that assists customers in achieving their financial goals through a more practical banking experience. The wondr by BNI app includes three distinct Financial Dimensions (Transactions, Insight, and Growth), which reflect the concept of the present, past, and future for the best banking experience as customers transact and plan for the future.

wondr by BNI

jadiin maumu.



The first dimension, Transactions, facilitates users in doing any of today's banking activities that fall under daily transactions such as domestic transfers, overseas transfers, foreign exchange transfers, e-wallet top-ups, TapCash top-ups, QRIS payments, monthly utility payments (PLN, PDAM), purchasing credit and data packages, paying tuition fees, donations and charities, BNI Finance installments and setting transfer schedules, which all can be done in just three simple steps that make such experience exceptionally practical transaction experience. wondr by BNI also has the Lifestyle feature as a solution for modern lifestyle needs, such as ordering and purchasing tickets for the Jakarta-Bandung bullet train "Whoosh". The app also allows customers to use only one screen to see all the assets they have under management within the BNI ecosystem and Subsidiaries, such as Savings and Current Accounts, Term Savings, Deposits, Investments (Mutual Funds, Bonds, Stocks), DPLK, and Bancassurance.

The second dimension, Insight, is designed to help customers check historical income and past earnings more comfortably. With its installed in-depth financial analysis and recap according to the period specified by the customer from all transactions made across all BNI channels via ATM, EDC, and digital channels, this feature should help customers understand their spending patterns and identify details of their transacted finances for better financial planning in the future.

The third dimension, Growth, focuses on future planning with the offerings of various hyper-personalized and customer-driven financial product options that also align with their risk profiles. wondr by BNI helps customers plan for the future with multiple products such as Term Savings or Life Goals (Tapenas) that can be adjusted according to savings goals, such as education funds, vacations, religious tourism, home down payments, gadget purchases, vehicle purchases, wedding savings or other savings with adjustable planning options based on monthly targets or budgets. Customers can also open a Time Deposit Account in the currency of their preference, such as IDR, USD, and SGD. They can also make Mutual Fund investment transactions easily through wondr by BNI with a choice of products that adjust to the risk profile of every individual customer.

wondr by BNI is the realization of BNI's transformation to bring innovative banking app for individual customers to use as the app facilitates their transactions and allows them to make more optimum future planning. wondr by BNI should come to serve as a solution that enables more comprehensive banking activities for the people as they plan a future that each one of them aspires to build.



Highlight 2024:

BNIdirect Transformation

This year marks BNI's strategic step in optimizing digital services through the transformation of BNIdirect, its leading digital wholesale platform. BNI's digital transaction services were offered across various platforms, requiring a more integrated approach whenever a need for higher efficiency and easier customer access would come up. This transformation has made BNIdirect a more comprehensive, integrated platform that aligns with the needs of modern businesses. This step reflects BNI's commitment to strengthening its role as a trusted partner in supporting digitalization and business growth in an increasingly competitive era.



BNIdirect Transformation Mission

In transforming BNIdirect, BNI focuses on four main pillars that are the core of this solution:

1. **Transaction Process Automation:** Reducing operational burdens through automated processes that increase productivity and reduce the risk of manual errors.
2. **Customer Operational Efficiency:** Providing convenience for customers in managing financial activities quickly and accurately.
3. **Service Integration in One Platform:** Combining all transaction needs in one integrated access.
4. **Maximum Security:** Adopting the latest technology to protect customer data and transactions from security threats.

BNIdirect Transformation Journey

Since its launch in 2009, BNIdirect has continued to transform to meet increasingly complex customer needs. Initially introduced as an internet-based corporate banking service, BNIdirect has further evolved into a platform that brings various innovations to improve convenience, speed, and security to support the Bank's operations.

BNIdirect's transformation as strategic stride BNI is making to create an integrated digital platform. The various wholesale digital solutions that were once offered in different platforms of the Bank, such as Cash Management, Virtual Account, Supply Chain, Trade, and Foreign Exchange, are now all

brought together into a single integrated portal. This approach gives easier access, increases operational efficiency, and simplifies customer transaction management. This transformation also strengthens service reliability to meet sustainable business needs in the digital era.

With an intuitive interface and continuously developed capabilities, BNIdirect ensures that every corporate and MSME customer segment gets a more structured and secure solution to manage financial transactions.

Benefits for Customers

The new BNIdirect is designed to add value to various customer segments. By supporting business liquidity and financial management efficiency and providing complete visibility of finances, BNIdirect helps customers make faster and more informed decisions. In addition, this platform strengthens customers' capabilities in empowering local and global businesses while building long-term relationships with business partners.

Sustainable Business Impact for BNI

BNIdirect offers easy transactions and contributes to the growth of not only customers but also BNI's business:

- **Enhanced Customer Loyalty:** By providing more integrated, modern, and efficient banking solutions, BNI strengthens customer relationships, builds trust, and creates long-term cooperative relationships.
- **Strong and Sustainable Giro Base:** Continuous increase in transaction volume through New BNIdirect helps expand the low-cost fund base, creates a more solid ecosystem, and supports fund stability for sustainable business growth.
- **Fee-Based Income (FBI):** With growing transaction activity on the BNIdirect platform, BNI strengthens the contribution of earned fee-based income, which supports business sustainability and customer service expansion.
- **Strengthening Position in the Wholesale Market:** With various digital innovations and a focus on more integrated services, BNI continues to strengthen its position as a leader in the wholesale banking sector, both nationally and internationally, with the offerings of solutions designed to meet dynamic business needs.

Towards a Digital Future

BNIdirect proves BNI's commitment to sustaining a more efficient, trustworthy, and integrated business ecosystem. Its customer-centric approach ensures customers can focus on business expansion without dealing with complex financial transactions.

Through this innovation, not only does BNI bring financial solutions, but it also becomes a strategic partner that supports customers in achieving their goals. With BNIdirect, BNI directs customers' businesses to new heights, creating a brighter future for all participating parties.



2024 Achievements

Adaptive in facing a dynamic business environment in 2024 armed with healthy financial fundamentals and a competitive digital platform, BNI accelerates business growth in terms of savings, lending, and customer transactions, so as to provide good results in 2024, and make BNI continue to grow positively in providing the best for customers, shareholders, and all stakeholders.

IDR257.5 Trillion

Total customer savings

grew by 11.0% compared to IDR232.0 trillion in the previous year.

IDR775.9 Trillion

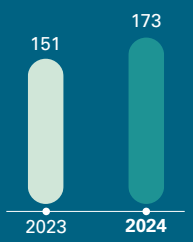
Total loans disbursed

grew by 11.6% compared to IDR695.1 trillion in the previous year.

Solid transaction banking performance in support of CASA

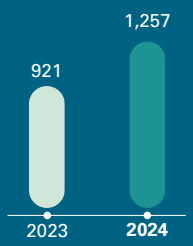
Wholesale segment transaction banking

Number of BNIdirect Users (in thousand)



14.2 % YoY

Total BNIdirect Transaction (in million)



36.5 % YoY

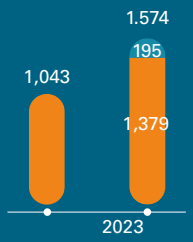
Retail segment transaction banking

Number of Users (in million)



44.4 % YoY

Total Transactions (in million)



BNI Mobile Banking

wondr by BNI

50.9 % YoY

IDR66.6 Trillion

Total interest income

increased by 8.3% compared to IDR61.5 trillion in the previous year.

IDR64.5 Trillion

Total operating income

increased by 2.8% compared to IDR62.7 trillion in the previous year.

2.0 %

Non Performing Loan (NPL) (Gross) Ratio

decreased by 0.1% compared to 2.1% in the previous year.

1.1 %

Credit Cost

provisioning to total loans (credit cost) decreased by 0.3% in line with the improvement in asset quality.

IDR21.5 Trillion

Comprehensive income for the year attributable to equity holders of the parent entity

increased by 2.7% compared to IDR20.9 trillion in the previous year.

21.4 %

Minimum Capital Adequacy Ratio (CAR)

Minimum Requirement Ratio Well above the minimum requirement set by the regulator of 13.8%.

AAA /Stable
Corporate Rating by PEFINDO

BBB- /Stable
Corporate Rating by Fitch

BBB /Stable
Corporate Rating by S&P

Baa2 /Stable
Corporate Rating by Moodys

Table of Contents

Transforming the Future, Empowering Indonesia

Theme Continuity	2
BNI Competitive Advantage	4
Milestones	6
Highlight 2024: BNI Transformation	10
Highlight 2024: wondr by BNI	12
Highlight 2024: BNIdirect Transformation	14
2024 Achievements	16

01 2024 Performance

Important Financial Data Overview	22
Business Performance Overview	28
Shares Overview	31
Bonds, Sukuk and/or Convertible Bonds Overview	34
Other Funding Sources	36
Event Highlights 2024	38

02 Management Report

Board of Commissioners' Report	45
Board of Directors' Report	57
Board of Directors' Responsibility Statement for the 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk	76
Board of Commissioners' Responsibility Statement for the 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk	77

03 Company Profile

General Company Information	80
Company Identity	83
Brief History of the Company	84
Vision, Mission, and Corporate Culture	86
Lines of Business	90
Company Operational Areas	94
Organizational Structure Company	96
Association Membership List	98
Board of Commissioners' Profiles	100
Board of Directors' Profiles	114
Information on Changes in the Composition of Members of the Board of Directors and/or Members of the Board of Commissioners that Occurred after the Financial Year	129
Senior Executive President Profiles	130
Executive Officers Profiles	134
Employee Demographics	156
Shareholder Structure and Composition	168
Information on the Company's Majority and Controlling Shareholder	174
List of Subsidiaries and/or Associated Entities	176
Corporate Group Structure	188
Share Listing Chronology	190
Other Securities Listing Chronology	192
Information on Public Accountants, Public Accounting Firms, and Networks/Associations/Alliances	202
Capital Market Supporting Institutions and/or Professionals	202
Information Available on The Website	205
Awards and Certification	208

04 Management Discussion and Analysis on Company Performance

Economy and Industry Overview	220
BNI Strategic Policy for 2024	226
Operational Overview per Business Segment	228
Digital Banking	282
Comprehensive Financial Overview	300
Commitments and Contingencies	331
Spot Transactions, Derivatives, and Hedging Facilities	333
Pledged Bank Assets	335
Prime Lending Rate (SBDK)	336
Ability to Pay Debt	339
Company Receivables Collectibility Level/Loan Collectibility Level	340
Credit Risk Management	343
Capital Structure and Management Policy for Capital Structure and Capital Risk Management Practices	352
Material Commitments for Capital Goods Investments	354
Capital Goods Investments Realized In The Last Fiscal Year	356
Property for Investment	357
Information and Material Facts That Occurred After The Date of the Accountant's Report	357
Business Target Achievements in 2024	358
Business Continuity Information	361
Details of Matters Arising in 2024	364
Business Prospects for 2025	365
Performance Projections for 2025	367
Marketing Aspect	369
Dividend and Distribution Policy	373
BNI's Contribution to National Development	376
Information regarding the Realization of Use of Public Offering Proceeds	377
Negotiable Certificate of Deposit (NCD) Rupiah & Foreign Currencies	384
Material Information Regarding Corporate Action, Investments, Expansions, Divestments, Business Mergers, Acquisitions, and/or Restructuring	385
Information on Material Transactions that Contain Conflicts of Interest and/or Transactions with Affiliated/ Related Parties	387
Prohibitions, Restrictions and/or Significant Barriers to Transferring Funds Between Banks and Other Entities in One Business Group	397
Changes to Legal Regulations that significantly impacted BNI	398
Changes in Accounting Policies and Their Impact on BNI	410
Bank Health Level	411
PMN Additional Use Report	412
Implementation of National Strategic Projects or Other Assignments	413

05 Business Support Functions

Human Capital	416
Information Technology	432
Information Technology Governance	444
Service Digitization	451
Services and Networks	459
Customer Experience Center	460
Data Management & Analytics	463
Service Quality Function	466

06 Capital and Risk Management Practices

Capital	474
Risk Management Practices	476
Risk Exposure Disclosure	518

07 Good Corporate Governance

Best Achievements in Corporate Governance Implementation	604
Commitment to Sustainable Corporate Governance Implementation	605
Correlation Between Corporate Governance Implementation and Bank Performance	610
Governance Framework	611
Corporate Governance Structure and Mechanism	612
Continuous Improvement of GCG Implementation Quality	615
General Meeting of Shareholders	630
Board of Commissioners	652
Independent Commissioners	699
Board of Directors	703
Performance Assessment of the Board of Directors and the Board of Commissioners	763
Nomination and Remuneration	768
Diversity of the Board of Commissioners and the Board of Directors	788
Disclosure of Affiliation Relationships Among The Board of Commissioners, Board of Directors, and Controlling Shareholders	790
Committees under the Board of Commissioners	792
Supporting Organs of the Board of Commissioners	858
Committees under the Board of Directors	862
Supporting Organs of the Board of Directors	899
Internal Control System	938
Risk Management System	946
Integrated Risk Management Governance	971
External Auditor	978
Legal Cases	983
Administrative Sanctions	989
Violations of Laws Related to Employment, Consumer, Bankruptcy, Commercial, Competition and/or Environmental Issues	989
Access to Company Information and Data	990
Governance Framework, Management, and Control of Tax Aspects	1027
Anti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction (APU, PPT, and PPPSPM)	1028
Anti Corruption Policy	1033
Anti-Gratification & Anti-Bribery Policy	1035
Procurement of Goods and/or Services	1039
Company Code of Ethics	1044
Provision of Funds for Social and Political Activities	1048
Provision of Funds for Related Parties and Large Exposure	1049
Providing Loans to Related Parties	1051
Protection of Creditors' Rights	1053
Transparency of Financial and Non-Financial Conditions	1054
Transparency of Customer Complaints Procedures and Customer Dispute Settlement	1055
Integrity of Reporting and Information Technology Systems	1058
Conflict of Interest Policy (Including Insider Trading)	1059
Shares and Bonds Buyback	1058
Internal Deviations (Internal Fraud)	1062
Performance-based Long-Term Compensation Policy	1064
Disclosure of Information on Board of Commissioners and Board of Directors Share Ownership and Its Application	1070
Violation Reporting System (Whistleblowing System)	1080
Bank's Strategic Plan	1084
Reporting Transparency	1091
Management of State Officials' Assets Reports (LHKPN)	1092
Bad Corporate Governance Practices	1094
Integrated Governance Implementation	1095
Corporate Governance Aspects and Principles Implementation in Accordance with Financial Services Authority Regulations	1104
Implementation of Indonesian Corporate Governance General Guidelines (PUGKI)	1111
Implementation of The Asean Corporate Governance Scorecard	1138
Implementation of Corporate Governance Principles For Banks According To Basel Committee on Banking Supervision Standards	1147

08 Social & Environmental Responsibility

Social and Environmental Responsibility Commitment and Policies	1154
Special Assignment	1167

09 ESG Commitment

BNI 2024 Environment, Social, and Governance (ESG) Performance Highlights	1172
BNI 2024 ESG Development Expectation Setting Meeting (ESM)	1173
ESG Implementation Commitment	1176
BNI ESG Risk Management	1178
Persons Responsible for ESG Implementation at BNI	1182
BNI's ESG Implementation Supervision and Evaluation	1184
Implementation of Sustainable Finance In Subsidiary Companies	1185
ESG Index: BNI Sustainability Practice Summary	1192

10 Financial Statements

Financial Statements	1198
Attachment to Financial Services Authority Circular Letter No. 9/SEOJK.03/2020	1521
Cross-Reference SEOJK No. 16/SEOJK.04/2021	1525

01

2024 Performance

Important Financial Data Overview	22
Business Performance Overview	28
Shares Overview	31
Bonds, Sukuk and/or Convertible Bonds Overview	34
Other Funding Sources	36
Event Highlights 2024	38

2024 Performance


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by BNI
E-Wallet
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Important Financial Data Overview [ACGS C.2.2]

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

In billion Rupiah, unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021*)	2020**)	2020
Assets							
Cash	13,710	11,207	22.3	13,448	13,684	16,908	17,324
Current Accounts with Bank Indonesia	51,669	65,256	(20.8)	82,922	48,682	33,550	35,066
Current Accounts with Other banks - Net	22,074	35,023	(37.0)	15,922	19,570	15,678	16,108
Placements with Other Banks - Net	17,076	43,794	(61.0)	51,569	92,290	56,141	61,329
Marketable Securities - Net	48,534	37,165	30.6	28,556	25,803	22,632	29,687
Securities Purchased under Agreements to Resell - Net	7,972	13,951	(42.9)	16,631	22,011	8,666	8,666
Bills and Other Receivables - Net	13,243	18,999	(30.3)	20,729	19,563	17,894	17,894
Acceptance Receivables - Net	15,926	17,091	(6.8)	18,912	20,543	20,499	20,576
Derivative Receivables- Net	1,793	996	80.0	685	494	1,461	1,461
Loans Disbursed	775,872	695,085	11.6	646,188	582,436	553,106	586,207
Allowance for Impairment Losses of Loans Disbursed	(38,685)	(47,158)	(18)	(50,334)	(50,295)	(42,932)	(44,228)
Government Bonds	132,069	127,099	3.9	121,291	111,429	84,150	90,659
Prepaid Taxes	19	643	(97.0)	644	1,051	1,050	1,050
Prepaid Expenses	2,941	2,743	7.2	3,244	3,096	2,699	2,807
Investments in Associates	12,748	11,284	13.0	10,049	8,689	-	-
Equity Investments - Net	637	564	12.9	609	830	4,177	813
Other Assets	14,107	16,972	(16.9)	13,856	11,849	13,383	13,758
Fixed Assets - Net	30,408	27,765	9.5	26,549	26,883	26,257	27,362
Intangible Assets	743	744	(0.1)	753	-	-	-
Deferred Tax Assets - Net	6,950	7,441	(6.6)	7,614	6,230	4,591	4,800
Total Assets	**1,129,806**	**1,086,664**	**4.0**	**1,029,837**	**964,838**	**839,910**	**891,337**
Liabilities							
Obligations Due Immediately	5,515	5,295	4.2	4,686	4,554	5,508	5,561
Deposits from Customers	805,511	810,730	(0.6)	769,269	729,169	631,551	647,572
Deposits from Other Banks	18,548	11,894	55.9	15,245	14,377	9,245	9,023
Derivative Payables	1,479	810	82.6	775	110	414	414
Securities Sold Under Agreements To Repurchase	15,891	6,891	130.6		1,829	2,590	2,590
Acceptance Payables	4,229	5,748	(26.4)	5,301	5,588	5,423	5,500
Accrued Expenses	1,529	1,664	(8.1)	1,441	1,242	1,125	1,182
Taxes Payable	318	823	(61.4)	1,551	1,284	1,060	1,148
Employee Benefits	7,147	7,006	2.0	6,880	6,138	5,652	6,344
Provisions	2,283	2,173	5.1	2,712	2,276	1,421	1,422
Other Liabilities	26,564	26,125	1.7	21,130	20,542	18,038	18,280
Securities Issued	12,975	4,893	165.2	4,897	2,986	2,985	2,985
Borrowings	42,931	30,950	38.7	35,654	32,458	44,114	44,114
Subordinated Securities	17,699	16,929	4.5	17,213	15,765	100	100
Total Liabilities	962,619	**931,931**	**3.3**	**889,639**	**838,318**	**729,226**	**746,236**

In billion Rupiah, unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021*)	2020**)	2020
Deposits from Customers		-		-	-	-	31,881
Deposits from Other Banks		-		-	-	-	349
Mudharabah Sukuk Issued		-		-	-	-	-
Total Temporary Syirkah Funds		**-**		**-**	**-**	**-**	**32,230**
Equity							
Share Capital	9,055	9,055	0.00	9,055	9,055	9,055	9,055
Additional Paid-in Capital/Shares Issuance Cost.	17,010	17,010	0.00	17,010	17,010	14,568	14,568
Share-Based Payment Reserves	323	260	24.2	-	-	-	-
Transactions with Non-Controlling Interests	2,257	2,257	0.00	2,257	2,257	2,257	2,257
Asset Revaluation Reserve	16,711	15,448	8.2	15,441	15,442	14,882	14,963
Unrealized (Losses)/ (Gains) on Marketable Securities and Government Bonds Measured at Fair Value through Other Comprehensive Income, Net of Tax	(1,465)	(896)	(63.5)	(1,971)	1,949	2,424	2,424
Exchange Difference on Translation of Foreign Currency Financial Statements	(97)	(58)	(67.2)	(36)	(17)	23	23
Retained Earnings	118,664	107,236	10.7	94,060	78,250	64,878	66,981
Treasury Shares	0	(180)	(100.0)	-	(207)	(79)	(79)
Non-Controlling Interests	4,729	4,601	2.8	4,382	2,781	2,676	2,680
Total Equity	**167,187**	**154,733**	**8.0**	**140,198**	**126,520**	**110,684**	**112,872**
Total Liabilities, Temporary Syirkah funds and Equity	**1,129,806**	**1,086,664**	**4.0**	**1,029,837**	**964,838**	**839,910**	**891,337**

*) On February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia in accordance with the Capital Market approval through OJK S-289/D.04/2020 dated December 11, 2020, and OJK Banking Letter No. 4/DK.03/2021 dated January 27, 2021, therefore it is no longer into the consolidated financial statements of BNI and its Subsidiaries as of the Fiscal Year 2021.
**) Financial performance for 2020, taking into account the impact of releasing BNI Syariah's performance.

CONSOLIDATED STATEMENT OF PROFIT (LOSS) AND OTHER COMPREHENSIVE INCOME

In billion Rupiah, unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021*)	2020**)	2020
Interest Income and Sharia Income	66,583	61,472	8.3	54,659	50,026	52,144	56,173
Interest Expense and Sharia Expense	(26,103)	(20,196)	29.2	(13,338)	(11,779)	(18,103)	(19,021)
Interest Income and Sharia Income - Net	**40,480**	**41,276**	**(1.9)**	**41,321**	**38,247**	**34,041**	**37,152**
Premium Income and Investments Return	6,741	6,853	(1.6)	6,221	5,887	5,330	5,330
Claims Expenses	(5,017)	(5,194)	(3.4)	(4,670)	(4,488)	(3,859)	(3,859)
Premium Income - Net	**1,724**	**1,659**	**3.9**	**1,551**	**1,399**	**1,471**	**1,471**
Other Operating Income	22,311	19,812	12.6	18,600	16,219	13,640	13,413
Total Operational Income	**64,515**	**62,747**	**2.8**	**61,472**	**55,865**	**49,152**	**52,036**
Other Operating Expenses	(29,688)	(27,778)	6.9	(27,059)	(24,801)	(22,088)	(24,214)
Allowance for Impairment Losses	(8,211)	(9,196)	(10.7)	(11,514)	(18,297)	(22,038)	(22,590)
Operating Income	**26,616**	**25,773**	**3.3**	**22,899**	**12,767**	**5,026**	**5,231**
Non-Operating (Expenses) Income – Net)	(36)	(133)	(72.9)	(212)	(216)	(95)	(119)
Income Before Tax Expenses	**26,580**	**25,640**	**3.7**	**22,687**	**12,551**	**4,931**	**5,112**
Tax Expense	(4,911)	(4,534)	8.3	(4,205)	(1,574)	(1,610)	(1,791)

In billion Rupiah, unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021*)	2020**)	2020
Income for the Year	**21,669**	**21,106**	**2.7**	**18,482**	**10,977**	**3,321**	**3,321**
• Other Comprehensive (Loss)/ Income for the Current Period After Tax	997	674	47.9	(3.826)	745	872	872
Comprehensive Income for the Current Period	**22,666**	**21,780**	**4.1**	**14,656**	**11,722**	**4,193**	**4,193**
• Equity Holders of the Parent Entity	21,464	20,909	2.7	18,312	10,898	3,280	3,280
• Non-Controlling Interest	205	197	4.1	170	79	41	41
Comprehensive Income for the Year Attributable to:							
• Equity Holders of The Parent Entity	22,539	21,560	4.5	14,594	11,620	4,001	4,001
• Non-Controlling Interest	127	220	(42.3)	62	102	192	192
Basic Earnings per Share Attributable to Equity Holders of The Parent Entity (in full Rupiah amount)	**576**	**561**	**2.7**	**983**	**585**	**176**	**176**

*) On February 1, 2021, BNI Syariah officially joined PT Bank Syariah Indonesia Tbk in accordance with the Capital Market approval through OJK letter No. S-289/D.04/2020 dated December 11, 2020, and OJK Banking Letter No. 4/DK.03/2021 dated January 27, 2021, therefore it is no longer consolidated into the consolidated financial statements of BNI and its Subsidiaries as of the Fiscal Year 2021.

**) Financial performance for 2020, taking into account the impact of releasing BNI Syariah's performance.

STATEMENT OF CONSOLIDATED CASH FLOWS

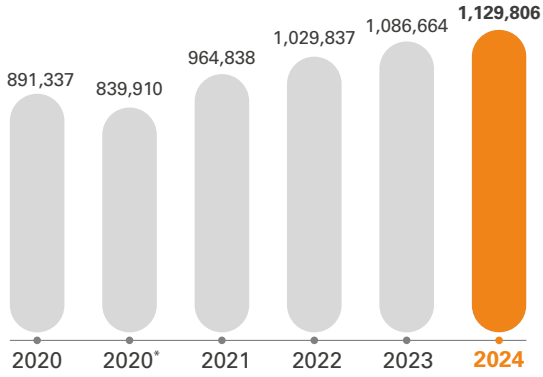
In billion Rupiah, unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021	2020
Cash Flows from Operating Activities	(63,218)	10,393	(708,3)	19,953	97,479	74,254
Cash Flows from Investing Activities	(5,270)	(10,771)	(51,1)	(32,233)	(15,656)	(11,992)
Cash Flows from Financing Activities	17,718	(8,493)	(308,6)	2,725	1,719	(17,139)
Increase/(Decrease) in Cash and Cash Equivalents	(50,770)	(8,871)	472,3	(9,555)	83,542	45,123
Impact of Loss of Control	-	-		-	(37,614)	-
Impact of Foreign Currency Exchange Rate Changes	(35)	(150)	(76,7)	115	505	600
Cash and Cash Equivalents at Beginning of Year	154,879	163,900	(5,5)	173,340	126,908	81,185
Cash and Cash Equivalents at End of Year	104,075	154,879	(32,8)	163,900	173,340	126,908

FINANCIAL RATIOS (BANK ONLY)

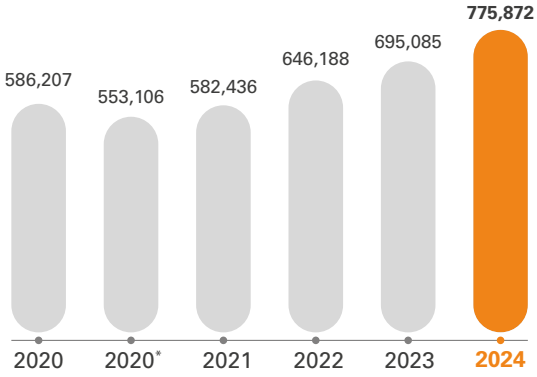
In percentage (%), unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021	2020
Capital						
Common Equity Tier 1 (CET1) Ratio	18.6	18.8	(0.2)	16.1	16.4	15.7
Tier 1 Ratio	20.0	20.3	(0.3)	17.5	17.7	15.7
Tier 2 Ratio	1.4	1.7	(0.3)	1.8	2.0	1.1
Minimum Capital Adequacy Ratio (KPMM)	21.4	22.0	(0.6)	19.3	19.7	16.8
Fixed Assets Against Capital	19.4	18.9	(0.5)	19.8	21.1	25.1
Assets Quality						
Distressed Earning Assets and Distressed Non-Earning Assets to Total Earning Assets and Non-Earning Assets	1.5	1.6	(0.1)	2.0	2.8	3.1
Distressed Earning Assets to Total Earning Assets	1.4	1.5	(0.1)	1.9	2.6	2.9
Gross NPL	2.0	2.1	(0.1)	2.8	3.7	4.3
Net NPL	0.7	0,6	0,1	0,5	0,7	0,9
Loan at Risk (LaR)	10,3	12,9	(2,6)	16,0	23,3	28,7

In percentage (%), unless otherwise stated	2024	2023	YoY 2023-2024 (%)	2022	2021	2020
Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets	3.9	5.2	(1.3)	6.0	6.5	6.2
CKPN Fulfillment for Earning Assets	3.7	4.7	(1.0)	5.4	5.9	2.9
CKPN Fulfillment for Non-Earning Assets	41.5	47.7	(6.2)	43.4	29.4	13.9
NPL Coverage Ratio	255.8	319.0	(63.2)	278.3	233.4	182.4
LaR Coverage Ratio	48.8	52.7	(3.9)	48.8	37.0	27.0
Loans to Total Earning Assets	66.6	64.0	2.6	64.3	63.2	66.9
Core Debtor Loans to Total Loans	31.4	35.9	(1.8)	28.6	31.2	30.3
Foreclosed Collateral to Total Loans	0.2	0.2	0.0	0.2	0.3	0.3
Profitability						
Return on Assets (ROA)	2.5	2.6	(0.1)	2.5	1.4	0.5
Return on Equity (ROE) - Tier 1 Capital Based	15.8	16.8	(1.0)	16.4	10.4	2.9
Return on Equity (ROE) - Equity Based	14.2	15.2	(1.0)	14.9	9.4	2.6
Net Interest Margin (NIM)	4.2	4.6	(0.4)	4.8	4.7	4.5
Other Operating Income to Operating Income	35.6	32.4	3.2	31.3	29.9	28.3
Profit (Loss) to Total Assets	2.0	2.0	0.0	1.9	1.1	0.3
Profit (Loss) to Total Equity	13.4	14.2	(0.8)	14.1	8.9	2.7
Total Liabilities to Total Assets	85.4	86.1	(0.7)	86.8	87.3	87.4
Total Liabilities to Total Equity	585.9	618.6	(32.7)	657.0	687.9	689.6
Fee Based Income to Total Other Operating Income	72.4	74.2	(1.8)	79.8	84.0	88.4
Earnings per Share (EPS) (In Rupiah full amount)	576	561	15	983	585	176
Liquidity						
Loan to Deposit Ratio (LDR)	96.1	85.8	10.3	84.2	79.7	87.3
Liquid Assets to Total Assets Ratio	15.0	19.9	(4.9)	21.5	24.8	20.2
Total Liquid Assets to Short-Term Funding Ratio	20.1	25.6	(5.5)	27.6	31.35	25.8
Macroprudential Intermediation (RIM) Ratio	93.3	89.0	4.3	83.4	74.1	75.4
Current Account/Saving Account (CASA) Ratio	70.4	71.6	(1.2)	72.9	69.4	68.4
Cost of Fund (CoF) Ratio	2.7	2.2	0.5	1.5	1.6	2.6
Compliance						
Legal Lending Limit (LLL) Percentage						
• Related Party	Nil	Nil	-	Nil	Nil	Nil
• Non Related Party	Nil	Nil	-	Nil	Nil	Nil
Exceeding of Legal Lending Limit (LLL) Percentage						
• Related Party	Nil	Nil	-	Nil	Nil	Nil
• Non Related Party	Nil	Nil	-	Nil	Nil	Nil
Minimum Statutory Reserves (GWM)						
• Primary Rupiah GWM	6.5	9.5	(3.0)	11.9	7.7	5.4
• Foreign Currency GWM	4.0	4.0	0.0	4.0	4.0	4.0
Net Open Position (NOP)	0.9	1.7	(0.8)	1.6	0.9	3.2
Efficiency						
Operating Cost/Operating Income (BOPO)	70.0	68.4	1.6	68.6	81.2	93.3
Cost to Income Ratio (CIR)	44.6	42.9	1.7	42.6	43.3	44.2
Other Ratios						
Operating Income/Employee (IDR-million)	2,254	2,182	72	2,195	1,985	1,738
Number of Employees (full amount, unaudited)	2,112	2,122	(10)	2,149	2,183	2,219
Number of ATMs (full amount, unaudited)	13,388	13,390	(2)	16,125	16,385	18,230
Number of Employees (full amount, unaudited)	27,203	27,570	(367)	27,170	27,177	27,202

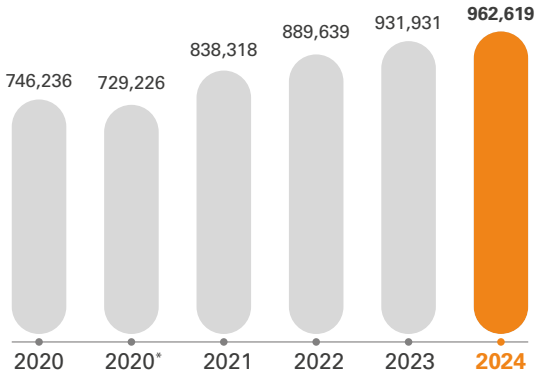
Total Assets
(IDR billion)



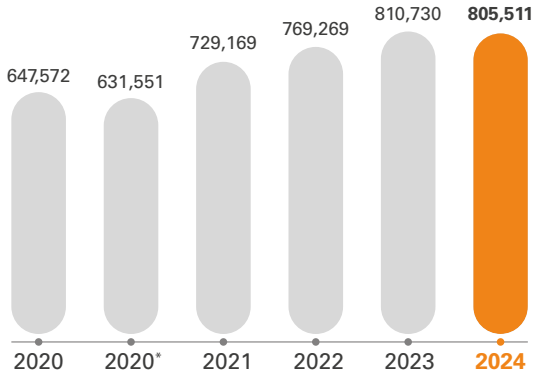
Loans Disbursed - Net
(IDR billion)



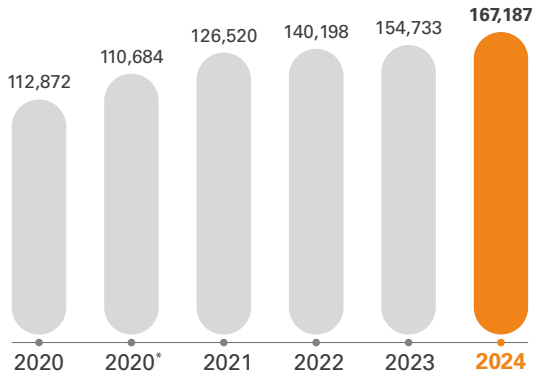
Total Liabilities
(IDR billion)



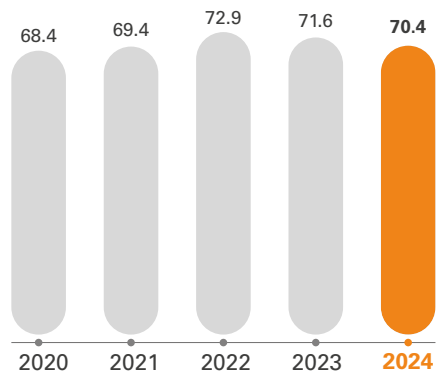
Customer Savings
(IDR billion)



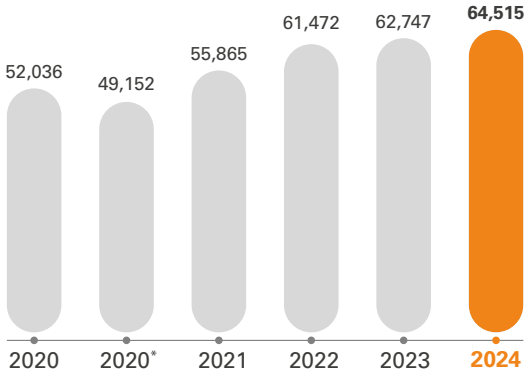
Total Equity
(IDR billion)



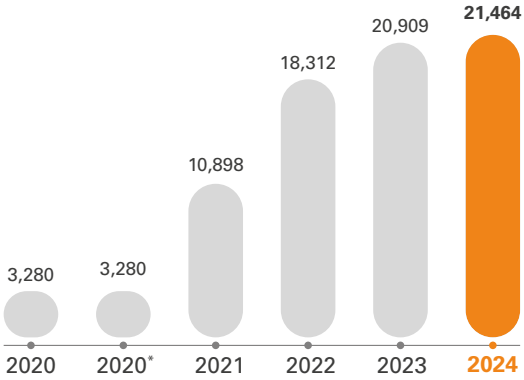
Current Account Saving Account (CASA) - Bank Only
(%)



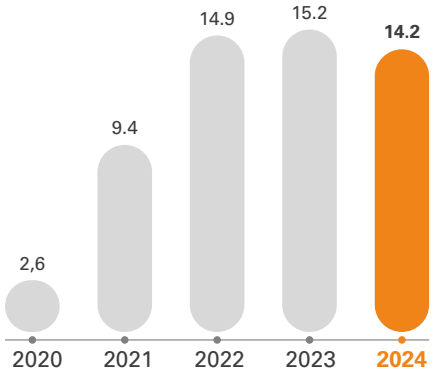
Operational Income
(IDR billion)



Net Income
(IDR billion)



Return on Equity (ROE) - Bank Only
(Using the average total equity as the denominator)



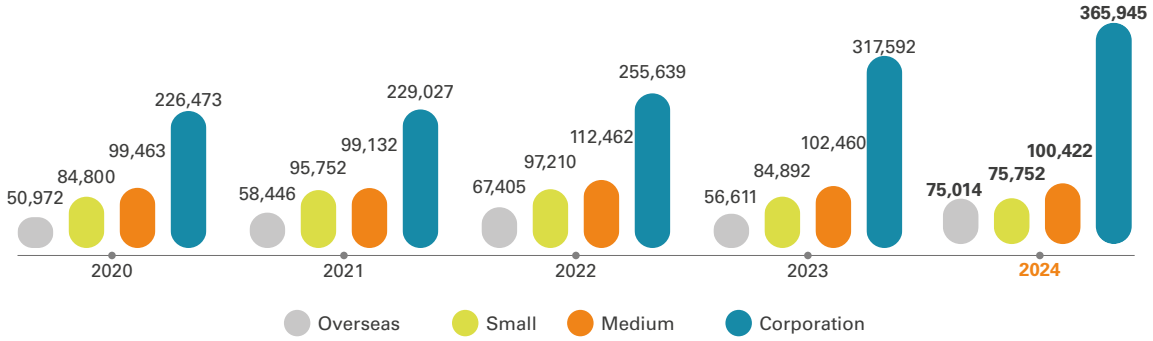
*) Financial performance for 2020, taking into account the impact of releasing BNI Syariah's performance.

Business Performance Overview

Loans Disbursed in the Business Banking Segment

In billion Rupiah, unless otherwise stated

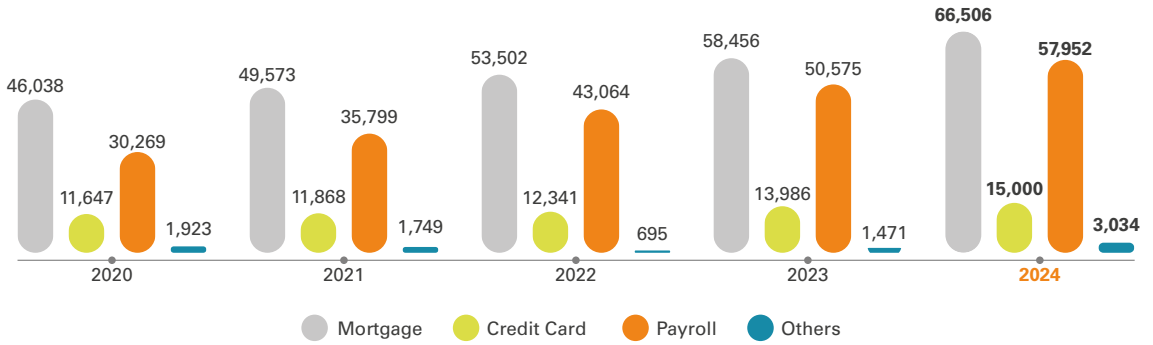
Description	2024	2023	YoY 2023-2024 (%)	2022	2021	2020
Corporation	365,945	317,592	15,2	255,639	229,027	226,473
Medium	100,422	102,460	(2,0)	112,462	99,132	99,463
Small	75,752	84,892	(10,8)	97,210	95,752	84,800
Overseas	75,014	56,611	32,5	67,405	58,446	50,972
Total	**617,133**	**561,555**	**9,9**	**532,716**	**482,357**	**461,708**



Loans Disbursed in the Consumer Segment

In billion Rupiah, unless otherwise stated

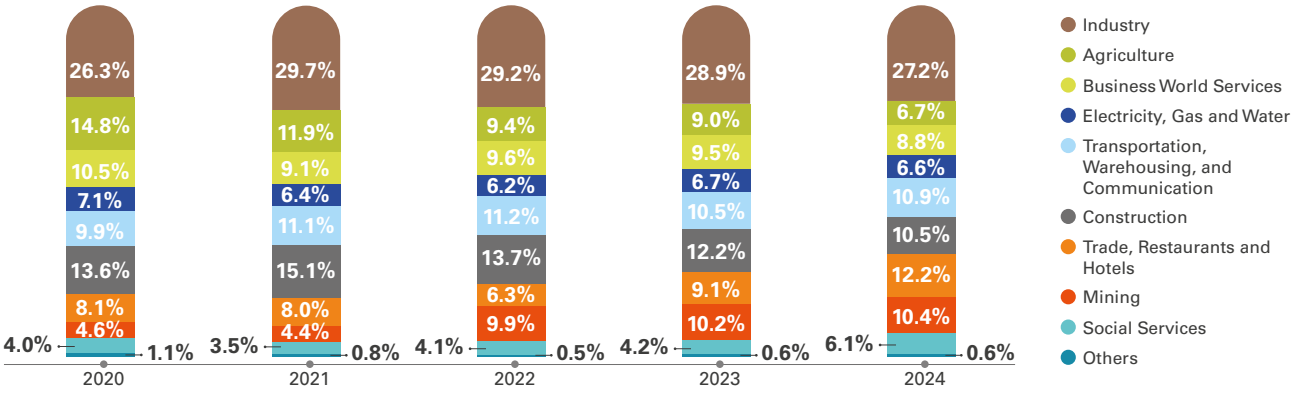
Description	2024	2023	YoY 2023-2024 (%)	2022	2021	2020
Mortgage	66,506	58,456	13.8	53,502	49,573	46,038
Credit Card	15,000	13,986	7.3	12,341	11,868	11,647
Payroll	57,952	50,575	14.6	43,064	35,799	30,269
Others	3,034	1,471	106.3	695	1,749	1,923
Total	**142,492**	**124,488**	**14.5**	**109,602**	**98,989**	**89,877**



Loans Disbursed in the Corporate Segments Including Overseas Based on Sector

In billion Rupiah, unless otherwise stated

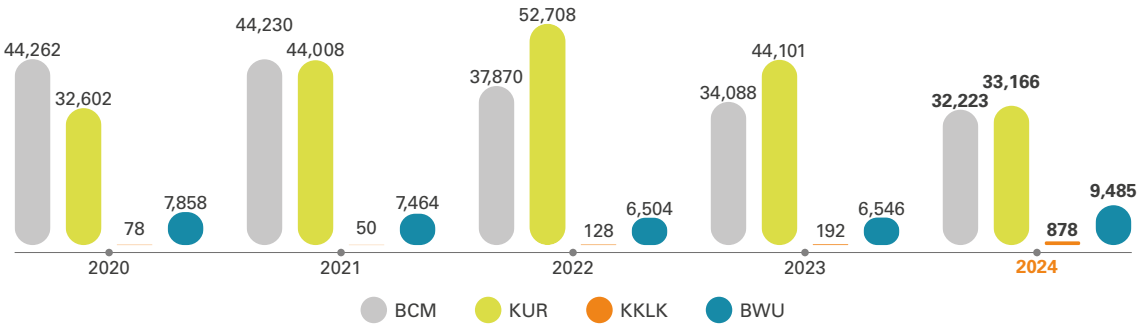
Description	2024		2023	2022	2021	2020
	Total Loan	Composition				
Industry	119,953	27.2%	105,030	94,346	85,361	72,911
Agriculture	29,327	6.7%	33,662	30,334	34,241	40,954
Business World Services	38,789	8.8%	35,473	30,892	26,056	29,236
Electricity, Gas and Water	29,025	6.6%	25,038	19,871	18,454	19,799
Transportation, Warehousing, and Communication	48,228	10.9%	39,399	36,248	31,785	27,514
Construction	46,412	10.5%	45,764	44,112	43,470	37,707
Trade, Restaurants and Hotels	53,895	12.2%	34,139	20,313	23,094	22,355
Mining	45,933	10.4%	38,233	31,912	12,524	12,788
Social Services	26,885	6.1%	15,866	13,274	10,127	11,230
Others	2,511	0.6%	2,325	1,742	2,361	2,952
Total	**440,959**	**100%**	**374,930**	**323,044**	**287,473**	**277,446**



Loans Disbursed in the Small Business Banking Segment

In billion Rupiah, unless otherwise stated

Description	2024	2023	YoY 2023-2024 (%)	2022	2021	2020
Branch Credit Management (BCM)	32,223	34,088	(5.5)	37,870	44,230	44,262
People's Business Loans (KUR)	33,166	44,101	(24.8)	52,708	44,008	32,602
Loans for Financial Institutions (KKLK)	878	192	357.3	128	50	78
BNI Entrepreneurs (BWU)	9,485	6,546	44.9	6,504	7,464	7,858
Total	**75,752**	**84,927**	**(10.8)**	**97,210**	**95,752**	**84,800**

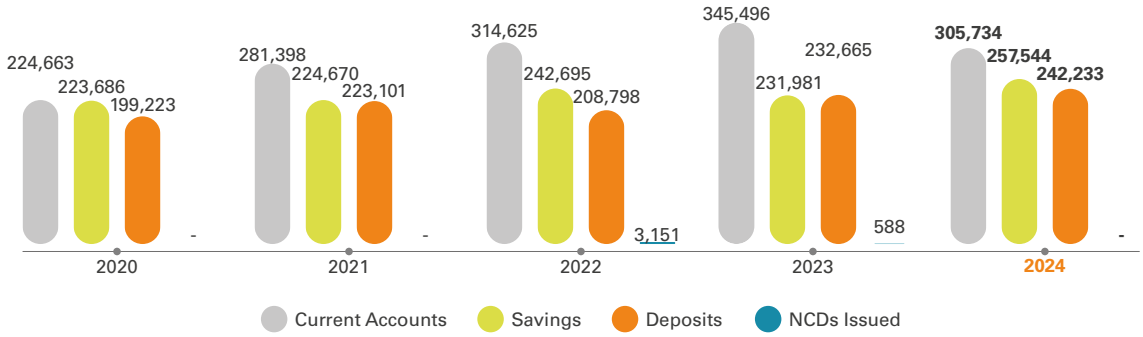


Third Party funds Performance - Excluding Temporary Syirkah funds

In billion Rupiah, unless otherwise stated

Description	2024	2023	YoY 2023-2024 (%)	2022	2021	2020*	2020
Current Accounts	305,734	345,496	(11.5)	314,625	281,398	221,050	224,663
Savings	257,544	231,981	11.0	242,695	224,670	211,278	223,686
Deposits	242,233	232,665	4.1	208,798	223,101	199,223	199,223
NCD Issued	-	588	(100.0)	3,151	-	-	-
Total	**805,511**	**810,730**	**(0.6)**	**769,269**	**729,169**	**631,551**	**647,572**

*) 2020 performance not including BNI Syariah performance.



COMPANY RATING 2024

Company Rating	Rating
PEFINDO	
Corporate Rating	AAA/Stable
Moody's	
Outlook	Stable
Foreign Long Term Bank Deposits	Baa2
Local Long Term Bank Deposits	Baa2
Baseline Credit Assessment	Baa3
Adjusted Baseline Credit Assessment	Baa3
Counterparty Risk Assessment	Baa2/p-2
Fitch Rating	
Long Term Foreign Currency	BBB-
Long Term Local Currency	BBB-/Stable
Short Term Foreign Currency	F3
Viability Rating	bb+
National Long Term Rating	AA+/Stable
National Short Term Rating	F1+
S&P Global Ratings	
Outlook	Stable
Long Term Foreign Issuer Credit	BBB
Long Term Local Issuer Credit	BBB
Short Term Foreign Issuer Credit	A-2
Short Term Local Issuer Credit	A-2

Shares Overview

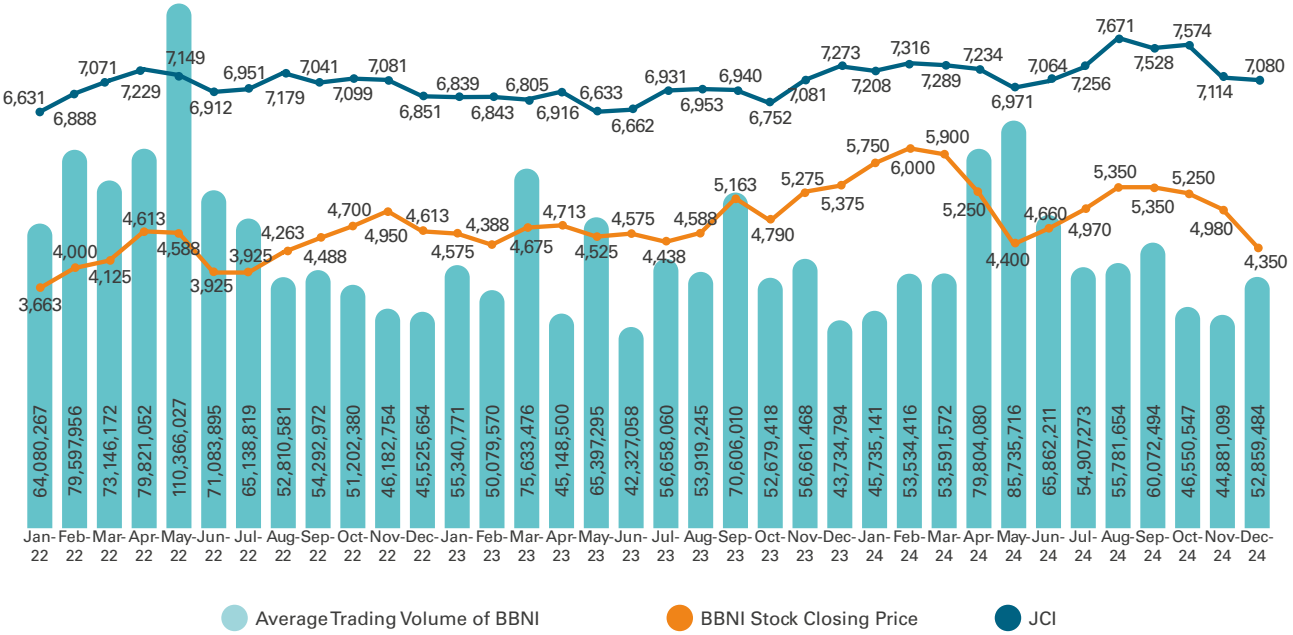
BNI has listed and traded its shares on the Indonesian Stock Exchange (formerly the Jakarta Stock Exchange and the Surabaya Stock Exchange) since November 25, 1996. This makes BNI the first state bank to become a public company.

Information on BBNI Share Movement 2022-2024 on the Indonesia Stock Exchange

Period	Number of Shares (shares)*	Share Price (IDR/share)				Average Transaction Volume (shares)	Market Capitalization (IDR-million)
		Opening	Highest	Lowest	Closing		
2024							
Quarter I	37,297,312,916	5,375	6,225	5,350	5,900	50,593,808	220,054,142
Quarter II	37,297,312,916	5,650	5,650	4,300	4,660	77,031,308	173,805,481
Quarter III	37,297,312,916	4,710	5,825	4,650	5,350	56,792,517	199,540,623
Quarter IV	37,297,312,916	5,375	5,675	4,710	4,350	47,945,400	162,243,311
2023							
Quarter I	18,648,656,458	9,226	9,626	8,500	9,350	60,516,945	174,364,938
Quarter II	18,648,656,458	9,350	9,576	8,750	9,150	52,403,504	170,635,207
Quarter III	18,648,656,458	9,226	10,326	8,676	10,326	60,185,561	192,547,378
Quarter IV*	37,256,798,316	5,150	5,375	4,790	5,375	51,372,390	200,473,051
2022							
Quarter I	18,648,656,458	6,725	8,500	6,725	8,250	35,964,464	153,851,416
Quarter II	18,648,656,458	8,200	9,600	7,850	7,850	42,407,747	146,391,947
Quarter III	18,648,656,458	7,850	9,175	7,225	8,975	28,647,641	167,371,688
Quarter IV	18,648,656,458	8,900	9,900	8,425	9,225	23,791,038	172,033,858

* On October 6 2023, BNI has effectively implemented a stock split with a split ratio of 1:2 (1 share becomes 2 shares), The Stock Split did not cause a change in the value of share ownership by investors because the number of BNI outstanding shares increased to 2 times followed by the share price adjusting 0,5 times from the previous price, So, since the effective date, BNI shares were trading at the new price,

Comparison of BBNI and JCI Share Prices throughout the 2022-2024 Period



* On October 6, 2023, BNI has effectively implemented a stock split with a split ratio of 1:2 (1 share into 2 shares).shares). Therefore, since the effective date, BNI shares are traded at the new price.

Company Stock Performance Highlights

In the first quarter of 2024, or on March 13 to be exact, BBNI shares hit an all-time high, with a closing price of IDR6,225 per share and an also an all-time-high market capitalization of IDR232 trillion, driven by the positive response from the market to the company's transformation process that has proven to be running well.

Another positive catalyst came from the capital market's positive response to the Bank's AGMS decision to increase its Dividend Payout Distribution Ratio. In 2024, BNI distributed 50% of its total net profit, or the highest in its history, for the fiscal year 2023 as dividends to the shareholders after applying a gradual increase in the Dividend Ratio since 2021 (2021 Fiscal Year: 25%, 2022 Fiscal Year: 30%, and 2023 Fiscal Year: 50%). The total dividends distributed were equivalent to IDR10.45 trillion or IDR280.49 per share.

Into the second quarter of 2024, the market experienced volatility, causing BBNI's stock price to decline. That decline may have been due to the Fed's statement that interest rate cuts would likely regress, which triggered a sell-off by investors, especially against banks with weaker CASA franchises. In addition, the IDR exchange rate against the USD, which continued to hover at above IDR16,200 per USD, has sort of dispelled expectations of monetary policy easing. Another negative sentiment also came from the five-month-in-a-row deflation Indonesia experienced from May to September 2024, reflecting unrestored people's purchasing power.

But into the third quarter of 2024, the decline in BBNI's shares reversed into an uptick trend to the extent that even they recorded the highest QoQ growth amongst Indonesian peers. The trend was buoyed by the inflow of foreign capital of IDR13 trillion into the Indonesian stock market, where banking stocks were one of the investors' focus as more than 50% of foreign flow was put into the banks' stocks, showing a large capitalization. This uptrend reflects positive market responses towards BNI's management strategy, as seen from the NIM recovery, accelerated credit growth for the July-August period, and consistent asset quality with CoC maintained at 1.0%.

The fourth quarter of 2024 saw the sustained positive performance of shares of big-cap banks despite a capital flight from the country. Based on market consensus, capital market analysts (sell side) projected BBNI's target price (TP) to be IDR6,327 per share. The closing price of BBNI shares on the last trading day of 2024, registered at IDR4,350 per share, suggested a potential upside of 45.4%. It reflects a maintained level of market confidence

towards BBNI shares driven by abounding optimism about macroeconomic conditions and the new administration's beginning to undertake initiatives to improve the domestic economy.

BNI foresees significant and sustainable business growth opportunities, in line with the government's vision to increase GDP, alleviate poverty, and run various sectoral priority programs covering infrastructure, energy and food security, SME empowerment, industrial downstream such as agriculture and fisheries, and housing programs.

The optimism towards the new government's priority economic policies following the smooth leadership transition and the progress of BNI's corporate transformation with its constantly optimal results should be a positive catalyst for BBNI's stock movement in the future.

SUSPENSION OF STOCK TRADING (SUSPENSION) AND/OR DELISTING OF STOCK

Over the course of the 2024 financial year, no sanction of stock trading suspension was imposed on BNI, nor were the bank's shares delisted from the Stock Exchange.

Bonds, Sukuk and/or Convertible Bonds Overview

List of outstanding Bonds for the Year 2024

Bond Name	Issue Date	Effective Date	Tenor	Currency	Value
Global Bonds 2024	April 5, 2024	April 5, 2024	5 years	USD	USD500,000,000

Bond Name	Issue Date	Effective Date	Tenor	Currency	Value
Environmentally Friendly Bonds (Green Bond) 2022					
Series A	June 21, 2022	June 10, 2022	3 years	Rupiah	Rp4,000,000,000,000
Series B	June 21, 2022	June 10, 2022	5 years	Rupiah	Rp1,000,000,000,000
BNI Tier II Capital Bond 2021	March 30, 2021	March 30, 2021	5 years	US Dollar	USD500,000,000
BNI Additional Tier I Capital Bond 2021	September 24, 2021	September 24, 2021	Perpetual, Non Callable 5,5 years	US Dollar	USD600,000,000

	Bid Price	Maturity Date	Interest Rate	Rating	Listing Exchange	Trustee	Status
	100.00	April 5, 2029	5.28% p.a.	S&P BBB Fitch BBB-	Singapore Exchange (SGX)	HSBC Corp. Ltd	Active/ Not Yet Due

	Bid Price	Maturity Date	Interest Rate	Rating	Listing Exchange	Trustee	Status
	100.00	June 21, 2025	6.35% p.a.	2023: idAAA (Pefindo) 2022: idAAA (Pefindo)	Indonesia Stock Exchange (IDX)	PT Bank Mandiri (Persero) Tbk	Active/ Not Yet Due
	100.00	June 21, 2027	6.85% p.a.	2023: idAAA (Pefindo) 2022: idAAA (Pefindo)	Indonesia Stock Exchange (IDX)	PT Bank Mandiri (Persero) Tbk	Active/ Not Yet Due
	100.00	March 30, 2026	3.75%	2023: idAAA (Pefindo) 2022: idAAA (Pefindo)	SGX Listing	HSBC Corp Ltd.	Active/ Not Yet Due
	100.00	Perpetual. First call option on March 24, 2027	4.3%	2023: idAAA (Pefindo) 2022: idAAA (Pefindo)	SGX Listing	HSBC Corp Ltd.	Active/ Not Yet Due

Other Funding Sources

Global Certificate of Deposit Issued in 2024

NCD Name	Issue Date	Effective Date	Tenor	Value (USD)	Maturity Date	Discount Rate	Status
BBNIIJ 0 11/21/2025	November 22, 2024	December 2, 2024	354 Days (1Y)	USD50 Million	November 21, 2025	4.92%	Outstanding

Global Certificate of Deposit (CD) Paid in 2024

NCD Name	Issue Date	Effective Date	Tenor	Value (USD)	Maturity Date	Discount Rate	Status
BBNIIJ 0 10/7/24	October 12, 2023	October 18, 2023	355 Days (1Y)	USD40 Million	October 7, 2024	6.07%	Mature
BBNIIJ 0 10/7/24	October 11, 2023	October 18, 2023	355 Days (1Y)	USD35 Million	October 7, 2024	6.05%	Mature

BNI Senior Notes Issued in 2024

NCD Name	Issue Date	Effective Date	Tenor	Value (USD)	Maturity Date	Discount Rate	Status
Global Bonds	April 5, 2024	April 5, 2024	5 Years	USD500,000,000	April 5, 2029	5.28%	Active/ Not yet Paid


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Event Highlights 2024

January

January 3



Synergy Between the Indonesian Consulate General and Indonesia Incorporated HK

The synergy between the Indonesian Consulate General in Hong Kong and Indonesia Incorporated Hong Kong attended by the Consul General of Indonesia in Hong Kong and all General Managers of Indonesian SOEs in Hong Kong under the Indonesia Incorporated umbrella. The event discussed the strategic activities and business alignment among Indonesian stakeholders in Hong Kong to promote positive impacts for related institutions and the Indonesian economy.

January 22



Consumer Protection Activities related to Financial Education for High School Students or equivalent in South Jakarta

BNI together with OJK, organized a consumer protection event focused on financial education for high school students or equivalent in South Jakarta. The event was attended by Ms. Friderica Widyasari Dewi (Executive Head of OJK Financial Services Business Conduct Supervisor), Ms. Kusumaningtuti Sandriharmy Soetiono (Chairperson of Indonesia Banking School) and Mr. Ronny Venir (BNI's Network and Services Director).

January 27



Indonesia Incorporated Day

The agreed work plan includes strategic collaborations among relevant institutions, focusing on several key priorities: industrial downstreaming, the food sector, the service industry, and the healthcare sector. The event was attended by senior officials from the Ministry of Foreign Affairs, Ambassadors, senior officials from the Ministry of SOEs, and senior leaders from state-owned and private companies.

January 31



Collaboration Between Anti-Fraud Function and the Ministry of Communication and Informatics

A collaboration between BNI's Anti-Fraud Function and the Ministry of Communication and Informatics to strengthen the Fraud Detection System and prevent money laundering and terrorism financing (APU-PPT) through data sharing of bank accounts, particularly BNI accounts suspected of misuse based on public reports.

February

February 8



Handover of Indonesia Smart Program (PIP) Education Assistance

Handover of Indonesia Smart Program (PIP) Education Assistance by the President of the Republic of Indonesia (Mr. Joko Widodo) channeled by BNI in Magelang and Blora.

February 21



Public Lecture by BNI President Director at Bandung Institute of Technology (ITB)

The President Director of BNI, Mr. Royke Tumilaar, delivered Public Lecture at the Institute of Technology Bandung (ITB)m attended by ITB Rector.

February 25



Financial Planning Education for Hong Kong's Diaspora

In order to support the diaspora in Hong Kong, the BNI Board of Directors represented by Network & Services Director together with OJK held a program to improve financial literacy and inclusion through education and the provision of financial products and services according to the needs of the diaspora in Hong Kong.

March

February 28 - March 3 & October 2 - 6



Inacraft Series

BNI actively supported the 24th Jakarta International Handicraft Trade Fair (Inacraft 2024) in collaboration with the Association of Exporters and Handicraft Entrepreneurs (ASEPHI). The exhibition was inaugurated by President Joko Widodo. At the event, BNI's President Director emphasized the bank's commitment to strengthening engagement with global SMEs through Xpora, a one-stop export solution program offering business consultation, training, financing, and business matchmaking opportunities for SMEs with international buyers.

March 6-7 & March 16



BNI Exporters Forum

The BNI Exporters Forum (BEF) serves as a platform to share insights and the latest information on export market prospects for MSMEs. Approximately 50 MSMEs (Ready to Export), ranging from small to medium enterprises, participated as BNI partners, showcasing a variety of superior export commodities.

March 13



Handover of Spekta Program Reward to BNI Agen46

BNI held a special program for BNI Agen46 with the name SPEKTA program. BNI Agen46 had the opportunity to win a prize of 1 Toyota Agya Car Unit which was won by BNI Agen46 Mr. Ahmad Jazuli located in Tanjung Karang.

March 5 - 8



Food Expo 2024 di Tokyo

The Ministry of Trade, in collaboration with the Indonesian Embassy in Tokyo, the Ministry of Agriculture, the Bank Indonesia Representative Office, BNI's Representative Office in Japan, and supported by the ASEAN Japan Center, facilitated several Indonesian businesses to participate in Japan's largest food and beverage exhibition. This initiative aims to continuously promote and strengthen the presence of Indonesian food and beverage products in Japan. The event was attended by the Indonesian Ambassador to Japan, the Deputy Governor of Bank Indonesia, the Director of Export Development for Primary Products at the Directorate General of National Export Development, and the Director of the Japan Indonesia Association.

BNI Tokyo, in partnership with XPORA, brought Indonesian food and beverage entrepreneurs to exhibit their products at the event. The expo attracted 76,000 visitors and featured 2,879 exhibitors, providing BNI clients with opportunities to introduce their products to the international market.

March 20



Social Engineering Discussion with Dittipidsiber Bareskrim Polri

A discussion focusing on fraud trends, methods, and the prevention of social engineering, including tactics such as fake bank transfer fee change notifications and malicious APK files. The session emphasized educating customers to safeguard their banking credentials as a critical mitigation step to avoid social engineering schemes.

March 20 - April 7



Glamlocal Series

BNI collaborates with Glamlocal to present a series of seven themed events at prominent shopping centers across Greater Jakarta (Jabodetabek). These events aim to connect with consumers who appreciate local MSME fashion. As part of this initiative, BNI enhances customer experiences by promoting cashless transactions through its Wondr by BNI application. The program includes various benefits, such as exclusive queue-free services, shopping voucher rewards, and TapCash bonuses for customers opening new accounts, offering added convenience and value.

April

April 4 - 6



Indonesia In Amsterdam, Amsterdam Coffee Festival 2024

PT Bank Negara Indonesia Tbk through BNI Xpora continues to encourage Indonesian MSMEs to penetrate the global market. This time, BNI Xpora is sending five superior Indonesian MSME coffee products with local flavors from various types of coffee exhibited including robusta and arabica from Lampung, West Java, Central Java, Flores, and North Sulawesi.

April 5



Issuance of USD500 million Global Bonds

As part of its strategy to diversify funding sources and drive business growth, BNI has issued Global Bonds valued at USD500 million (approximately IDR7.9 trillion) as part of its Euro Medium Term Note (EMTN) program. The strong investor demand is evident in the oversubscription of up to 6.4 times during the initial pricing guidance (IPG).

April 12 - 14



Indonesia in Chicago, Specialty Coffee Expo 2024

In an effort to support MSMEs going global, BNI New York Foreign Office together with BNI Xpora participated in the Specialty Coffee Expo 2024 coffee exhibition by bringing two specialty coffee products from its fostered MSMEs, namely Bajawa Coffee and Lampung Coffee. These two products have gone through curation carried out through coordination with the Indonesian Embassy's Trade Attaché office in Washington DC and the Specialty Coffee Association Indonesia (SCAI) to ensure quality and market feasibility in America.

BNI's participation in this exhibition is part of BNI's spirit and mission to go global in supporting Indonesian MSMEs.

April 19



BNI for Indonesia Juara

BNI extends its heartfelt appreciation to Indonesia's world-class athletes, among them are Muhammad Rian Ardianto and Fajar Alfianto, who triumphed as champions in the Men's Doubles category at the All England Badminton Tournament 2024. As well as Jonatan Christie, who secured victories in both the Men's Singles category at the All England Badminton Championship 2024 and the Badminton Asia Championship 2024.

May

May 24-26



BNI Java Jazz Festival 2024

BNI Java Jazz Festival 2024 is one of the largest and most prestigious music festivals in Indonesia. BNI participates in providing ticket purchase programs during pre-events and providing cashback programs at tenant booths during on-events as well as supporting the BNI Credit Card acquisition program.

June

June 14



Socialization of Financial Literacy and Inclusion with OJK, Bank BNI Educates Waste Management Community

BNI also opens opportunities for waste managers to join BNI Agen46 with various benefits that can be obtained. This is in line with OJK regulations on improving financial literacy and inclusion in the Financial Services sector for consumers and the public.

June 22



BNI Plants 78,000 Mangrove Seedlings in Teluk Pangpang, Banyuwangi, East Java

PT Bank Negara Indonesia (Persero) Tbk organized the planting of 78,000 mangrove seedlings to celebrate its 78th Anniversary, aiming to support climate change mitigation efforts and Indonesia's Net Zero Emission (NZE) target for 2060. BNI Group also has a decarbonization roadmap, setting NZE targets for operations by 2028 and for financing by 2060. The event was attended by the BNI's Network and Services Director.

June 30



Financial Education for Interns & the Diaspora in Japan

The CXC Division contributed to educating and raising financial literacy among interns, migrant workers, and the diaspora in Osaka, Japan, with the theme "Wise Management of Finances and Investments through Financial Education and Public Information Transparency." This activity was a collaboration with OJK and the Central Information Commission (KIP). The event was also attended by the Director of Networking & Services at BNI.

July

July 5



Launching wondr by BNI

BNI introduces the wondr by BNI banking app, designed to empower Indonesians with tailored solutions according to their respective financial needs for more organized financial management through the 3 Dimensions of Finance feature (Transactions, Insight and Growth). The launching of wondr by BNI was held on July 5, 2024.

July 5 - 7



wondr FEST & wondrPARADE

The wondrPARADE was held in several cities in Indonesia, including Jakarta, Medan, and Makassar. This initiative aimed to engage the public by providing a hands-on experience with the wondr by BNI application.

July 6



BNI Loudfest Vol.3

BNI held a spectacular music event entitled BNI Loudfest Vol 3 2024 to celebrate its 78th birthday. The event took place at the Gelora Bung Karno Main Stadium, Senayan, Jakarta, attended by Minister of SOEs Erick Thohir. BNI Loudfest 2024 is a form of appreciation to BNI Hi-Movers for their dedication and hard work in bringing progress to the company.

July 28



Join BPJS Ketenagakerjaan Campaign with BNI HK

the importance of insurance protection for Indonesian workers and the requirement for PMI (Indonesian Migrant Workers) to have BPJS. Registration can be done online, and payment can be made via Wondr BNI. The event was attended by the CEO of BPJS Ketenagakerjaan, BPJS Ketenagakerjaan supervisors, and PMI representatives in Hong Kong.

August

August 2 - 4



BNI Expo 2024

BNI Expo is an exhibition event organized by BNI to boost consumer loan transactions. This three-day thematic exhibition, held at ICE BSD, is the largest in Indonesia and attracted over 70,000 visitors who enjoyed various exciting offers and promotions from BNI and its subsidiaries. With the theme "Wondrful Journey," BNI invited all visitors to experience a digital transaction journey filled with surprises and convenience using wondr by BNI.

August 14



Compliance Forum

BNI, in collaboration with the KPK, held the Compliance Forum "Realizing an Anti-Corruption Culture Through the Instilling of Integrity Values," with the main goal of enhancing the knowledge and understanding of employees, particularly at the BOD, BOC, and C-1 levels, regarding corruption crimes in the business world, both from the regulatory and practical perspectives. The speaker at this event was a KPK Functional Officer.

August 23 - 26



2024 WOW Indonesia! Festival

WOW Indonesia celebrated 75 years of Indonesia-US relations. The WOW Indonesia Festival 2024 was attended by more than 20,000 Indonesian Diaspora and local community members. Five SMEs from the Xpora program participated in the event.

August 27



Cooperation Agreement on Indonesian Overseas Community Card (KMILN) between BNI & the Ministry of Foreign Affairs

BNI worked with the Ministry of Foreign Affairs' Directorate General of Public Information & Diplomacy to develop the Indonesian Overseas Community Card (KMILN), which allows the Indonesian diaspora to access banking services abroad.

The cooperation agreement was signed by BNI's Director of Network and Services and accompanied by BNI's Director of Institutional Banking on August 27, 2024, at the Ministry of Foreign Affairs.

September

September 2



Night of Appreciation for Olympic Achieving Athletes

The Ministry of State-Owned Enterprises, in collaboration with BNI, expressed appreciation to Indonesian athletes who successfully won medals at the Paris 2024 Olympics. BNI, as a partner in the development of Indonesia's badminton sports achievements, honored Gregoria Mariska Tunjung for winning a silver medal in the women's singles badminton category. The event, held at Pos Bloc Jakarta, was attended by the Minister of State-Owned Enterprises, the Vice President Director of BNI, and the Director of Human Capital & Compliance at BNI.

September 5



Opening of BNI's Representative Office in Sydney

As part of its commitment to expand its reach of banking services globally, BNI has inaugurated the BNI Representative Office in Sydney, Australia, which is also the first bank from Indonesia to open a representative office in Australia.

September 8



BNI UI Half Marathon 2024

The highlight of the *BNI UI Half Marathon 2024* featured 5K, 10K, and 21K (Half Marathon) categories with a green and clean route on the university campus, attracting 10,000 runners. The event was attended by the Deputy President Commissioner, Commissioners, Director of Institutional Banking, Secretary of the Ministry of SOEs, Deputy Governor of Bank Indonesia, Deputy Chairman of OJK, and the Chair of UI Alumni Association.

September 24



BNI ESG Sustainability & Transition (BEST) Event

BNI held the BNI ESG and Sustainability Transition Event, or BEST Event, with the theme "Energy Sectors Foresight to Encounter Indonesia's Sustainable Finance Taxonomy (TKBI)."

The BEST Event was attended by the Director of Risk Management at BNI, along with speakers from various institutions, including OJK, the Ministry of Environment and Forestry, the Ministry of Energy and Mineral Resources, and the International Finance Corporation (IFC), who shared insights on the challenges and opportunities in the green transition.

October

October 3



The Opening of BNI Singapore's office

The inauguration of the new BNI KLN Singapore office was attended by the Indonesian Minister of State-Owned Enterprises, the Deputy Minister of State-Owned Enterprises, Arsari Group, as well as the Representative of BNI's Founder (Mr. Hashim Djojohadikusumo), the Secretary of the Ministry of State-Owned Enterprises, the Indonesian Ambassador to Singapore, the President Director of BNI, and the management team.

October 8



BNI Investor Daily Summit

The BNI Investor Daily Summit event was opened by President Ir. H. Joko Widodo & attended by the Rector of BINUS University (as Speaker), Vice Rector of Global Employability & Entrepreneurship BINUS and the President Director of BNI along with all of the Board of Directors of BNI.

October 9



Launch of New BNIdirect

As part of its digital transformation efforts, BNI launched the digital wholesale banking service "BNIdirect." The launch of BNIdirect took place in conjunction with the BNI Investor Daily Summit 2024 event.

October 10 - 13



wondr Jakarta Running Fest 2024

wondr Jakarta Running Fest 2024 is an annual running event held, usually involving various running race categories, such as 5K, 10K, and half marathon. BNI participates in providing a 0% installment ticket purchase program & BNI Rewards Points during the event as well as a BNI Credit Card acquisition program.

October 11



BNI Exporters Forum

The BNI Exporter Forum is a Side Event of the Indonesian Trade Expo held by BNI in Tangerang City.

Through Xpora, BNI is committed to advancing Indonesian SMEs to go global by synergizing with the Ottawa Trade Attaché, the Indonesia Trade Promotion Center (ITPC) Vancouver Canada & the Hague Trade Attaché Netherlands to thoroughly explore export potential in the 2 countries.

This activity was attended by 35 Xpora Partner SMEs from small to medium segments and 3 diasporas from Canada and the Netherlands.

October 31 – November 3



BNI Indonesian Masters 2024

The BNI Indonesian Masters 2024 is the largest golf event in Indonesia, featuring 150 professional golfers from 30 countries. BNI will participate by offering acquisition programs and cashback programs at participating vendors during the event.

November

November 1



Best Indonesian Bank in Hong Kong for Serving Indonesia Diaspora

BNI received the prestigious award as the Best Indonesian Bank in Hong Kong for Serving Indonesia Diaspora from the Consulate General of the Republic of Indonesia (KJRI) in Hong Kong. The event was also attended by The Chief Executive of Hong Kong SAR, The Hon. John KC Lee. The award was received by the General Manager of BNI Hong Kong, Farid Faraitody, as a testament to BNI's commitment to providing the best services and innovative financial solutions for the growing number of Diaspora and Indonesian Migrant Workers in Hong Kong.

December

1 December



MURI Record for the First Empowerment of Persons with Disabilities

MURI Record for the First Empowerment of Persons with Disabilities as Laku Pandai Agent of BNI Agen46.

December 1



wondr by BNI BrightUp Cup 2024

BNI, in collaboration with PBSI, is once again organizing a badminton competition combined with music entertainment through wondr by BNI BrightUp Cup 2024. This event is enlivened by several Indonesian badminton athletes who have won various world tournaments and is concluded with a performance by the legendary band Sheila on 7. The Greysia Polii team, consisting of Anthony Sinisuka Ginting, Alwi Farhan, Tontowi Ahmad, Rinov Rivaldy, Fajar Alfian, and Jafar Hidayatullah, successfully defeated the opposing team led by Hendra Setiawan, joined by athletes such as Gregoria Mariska Tanjung, Marcus Fernaldi Gideon, Yeremia Rambitan, Jonatan Christie, and Muhammad Shohibul Fikri.

02

Management Report

Board of Commissioners' Report	45
Board of Directors' Report	57
Board of Commissioners' Responsibility Statement for the 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk	76
Board of Directors' Responsibility Statement for the 2024 Annual Report of PT Bank Negara indonesia (Persero) Tbk	77



Management Report


BNI



PRADJOTO

President Commissioner/Independent Commissioner

Board of Commissioners' Report

We believe that the Board of Directors performed admirably in discharging its duties and responsibilities during 2024. This assessment is based on certain matters, including the results of the Board of Directors Collegial KPI assessment, which revealed a reasonably strong performance against the Company's Work Plan and Budget (RKAP) and other established metrics. BNI's successful management in the midst of dynamic economic conditions lays a solid foundation for BNI to continue to grow and develop in the future.

DEAR SHAREHOLDERS AND STAKEHOLDERS,

Please allow us, on behalf of all members of the Board of Commissioners, to express our gratitude to God the Almighty for the achievement PT Bank Negara Indonesia (Persero) Tbk delivered in fiscal 2024 as the Bank navigated through tough industry challenges in running the business. Throughout the year, we exercised our oversight functions and duties and advised the Board of Directors on their strategies and policies as they conducted the Bank's business with full accountability against their stated mandates in the Bank's Articles of Association and applicable regulatory provisions.

We have been objective and independent in discharging our duties and responsibilities, always refraining from involvement in BNI's operational decision-making. We also ensured that BNI referred to the Articles of Association and the agreed-upon Bank Business Plan (RBB) for its banking operations.

We will use this report to elaborate on our assessment of the Board of Directors' performance, oversight of strategy execution, how we view the Board's business prospects, and the implementation of BNI's corporate governance during 2024.

GLOBAL AND NATIONAL MACROECONOMICS AND BANKING IN 2024

Economic conditions in 2024 were marked by volatility in the financial market amidst geopolitical turmoil, such as conflicts in some regions and the election of country leaders who promised to bring new directions. The IMF projected that 2024 would close with global economic growth of 3.2%, slightly lower than 2023, but added that growth to rise slightly in 2025.

A global economic challenge that appeared more prevalent was the divergent direction of economic growth. The higher-than-expected US economic growth (3% YoY until Q3-2024) was the opposite of what its European counterparts, such as Germany and the UK, saw this year. In addition, China, which had long been the engine of world economic growth, grew only 4.9% in 09M24, below its pre-pandemic average of 6.7%.

Domestically, Indonesia showed a relatively resilient economic growth of 5% up to Q3-2024. However, mixed signals in growth were seen, especially in terms of consumption, due to the eroding purchasing power of the lower-middle group, as reflected in low inflation throughout 2024 (1.6% YoY as of December 2024).

From a banking perspective, the nation's financial system was manageably controlled throughout 2024. Bank credit growth reached 10.4% YoY in November 2024, driven by working capital credit (8.4% YoY), investment (13.6% YoY), and consumption (10.6% YoY). Loan growth outpaced deposit growth at 4.5% YoY (November 2024). With such a growth picture, the loan-to-deposit ratio stood at 89% (November 2024), up from the year-end 2023 position (84%).

A further challenge came in the form of Rupiah's volatile exchange rate. While cuts in the Fed Fund Rate (FFR) had accumulated to 100 bps as the year unfolded, the impact on BI rate cuts (only -25%) was not as significant as initially expected. This points to the downward pressure on the Rupiah, especially at the end of last year. The exchange rate pressure escalated as the market gradually incorporated the risk of US President-elect (Donald Trump) policies that could potentially increase the risk of inflation in the US.

We witnessed how, despite the many challenges the year 2024 presented to the real, financial, and banking industries, BNI could sustain strong business growth with low-risk exposure. Its proven ability to navigate the dynamics of the global and domestic economies will be a great asset on the foundation of which the Bank welcomes the equally challenging year 2025.

ASSESSMENT OF THE PERFORMANCE OF THE BOARD OF DIRECTORS

Considering our prime role in overseeing the management of BNI's business by the Board of Directors, we have always used the shareholders' perspective to see how well the Board of Directors can optimize all of the Bank's existing resources. This perspective is our fundamental factor for prudently and accountably monitoring BNI's overall performance achievements.

The next thing we want to share is how we assess the performance of the Board of Directors using certain aspects as the basis of consideration, such as external factors like economic and banking industry landscapes. The Board's success parameters are formulated in such a way they can measure how the Board fulfills its duties and responsibilities and meets targets, including subsidiaries'. The results of the assessment are then outlined in the target plan in the Bank Business Plan (RBB) to be consulted with us before reported to the Financial Services Authority (OJK).

In addition, the Ministry of SOEs, as the proxy Indonesian Government as the shareholders, has established assessment measures for the implementation of duties and responsibilities for the management of SOEs by the Board of Directors. The performance of both the Boards of Directors and Commissioners is assessed once a year by the Ministry of SOEs using Key Performance Indicators (KPI). The assessment refers to the Regulation of the Minister of SOEs No. PER-2/MBU/03/2023 on Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises, as well as the Ministry of SOEs Letter No. S-63/Wk.R.MBU/10/2024 dated October 19, 2024.

The Board's performance assessment criteria consist of the collegial Key Performance Indicator (KPI) and individual KPI prepared in accordance with BNI's strategy and focus in the current period as stated in the Bank Business Plan (RBB). The collegial KPIs are translated into 5 (five) priority programs: Economic and Social Value for Indonesia, which includes financial and social aspects, Business Model Innovation, Technology Leadership, Investment Enhancement, and Talent Development. Each priority program has several KPIs that reflect financial and non-financial performance targets aligned with the established strategic initiatives. Meanwhile, the Board's individual KPIs are prepared in accordance with the members' respective duties, main functions, and responsibilities.

The Board's collegial and individual KPI achievements are reported periodically to the Board of Commissioners. On the other hand, the calculation of the Board's collegial and individual KPIs is reviewed by the Public Accounting Firm (KAP) assigned to audit BNI's financial statements and then submitted to the majority shareholder, in this case, the Ministry of SOEs.

In our assessment, the Board of Directors discharged their duties and responsibilities well for 2024. We base our evaluation on certain aspects, including the results of the Board of Directors Collegial KPI assessment, the reasonably strong achievement against the Company's Work Plan and Budget (RKAP), and other agreed measures. Beyond achieving predetermined targets, we also appreciate the Board's efforts to strengthen BNI's performance under such challenging circumstances. In the future, we mandate the Board of Directors to continue to collaborate with relevant stakeholders so they can continue to maintain the quality of BNI's performance growth.

In general, we welcome what BNI delivered in 2024. BNI's successful management in the midst of dynamic economic conditions is a strong foundation on which BNI can continue to grow and thrive in the future. That achievement was seen in the increase in loans distributed, which was offset by a decrease in gross Non-Performing Loans (NPL).

Savings as a component of fundamental funding also grew significantly this year by 11.0% YoY above industry growth of 6.6% YoY, providing an overview of BNI's management on the right track in line with shareholder aspirations. The growth of savings has an impact on the ratio of low-cost funds, or Current Account/Saving Account (CASA), which is maintained at 69.9%, providing a positive influence on profitability as expected by shareholders.

OVERSIGHT OF STRATEGY FORMULATION AND EXECUTION BY THE BOARD OF DIRECTORS

Our work relationship with the Board of Directors is built on mutual respect. There are limits to the responsibilities and roles we both shall discharge. The Board of Directors' role is to run the Bank's business and manage its operations, while ours is to watch over how well the Board of Directors manages BNI and the business group, give the necessary advice to the Board of Directors, and ensure that BNI implements the aspects of good corporate governance.

On an ongoing basis, we always attended to and focused on overseeing the formulation and execution of BNI's strategies and policies throughout 2024 for the Bank to face economic challenges and continued to bring BNI to deliver strong. Our oversight in 2024 was exercised primarily, but not limited to, making monthly evaluations on BNI's Corporate Plan and Bank Business Plan (RBB), financial performance in 2024 proposing the appointment of an External Auditor, submitting quarterly Performance Reports to the Ministry of SOEs, and exercising oversight functions on how BNI's internal control was running. We also focused on overseeing the achievement of several important aspects of the Bank's business plan, such as credit distribution, asset quality improvement, third-party fund collection, and higher productivity and efficiency. In devising and formulating the RBB, our role is to ensure that the Board has wholly observed the aspirations of stakeholders, especially investors and shareholders. We appreciate the strategic initiatives and policies related to Corporate Transformation that the Board of Directors has made since 2021. We expect to see the fruit of their labor in 2025.

The strategic steps over the last few years have allowed BNI to continue strengthening the business model and implementing a new work culture through the New Way of Working (NWOW) in 2024. Implementing this initiative can impact BNI's banking operations and add value in a sustainable manner.

We also continued to optimize the oversight function we exercised through the mechanism of our meetings, our joint meeting with the Board of Directors, meetings of our supporting committees providing our direction, opinions, or decisions, and paying work visits. In particular, we play an essential role in ensuring a sound implementation of GCG principles and practices at all levels of the BNI organization and at financial services institutions in the BNI Financial Conglomerate.

VIEWS ON HUMAN RESOURCE MANAGEMENT

In terms of Human Resource (HR) management, we assess that the Board of Directors has done a good job executing its HR strategies and policies throughout 2024. As a key aspect of the banking business, BNI has always positioned its human resources as a strategic partner in achieving goals through the implementation of various strategic policies that focus on developing effective employee competencies.

We also supported the efforts made by the Board of Directors in managing human capital using the Integrated Human Capital Framework in a targeted and measurable manner to align with BNI's business strategy. We see that the Board used this framework to provide added value to every human capital process employees go through and eventually improve the employee experience. We also supported the sustainability of the implementation of the NWOW initiative, which continued throughout 2024, contributing positively to BNI's performance achievements.

Every year, we observe the Board of Directors' consistent efforts in the field of HR, which improve the cultures of risk awareness and compliance through various existing programs. Furthermore, strengthening HR in BNI Corporate Transformation remains consistent with our expectations. The applied RACE (Risk Culture, Agile, Collaboration, and Execution Oriented) theme is essential in delivering transformation in the BNI environment. It is our greatest hope that this human resource strengthening will sustainably provide added value, not only for BNI as the employer but also for BNI Hi-Movers as they shape the personality of each.

VIEW ON THE IMPLEMENTATION OF INFORMATION TECHNOLOGY AND HOW TO LEAD THE CHARGE IN DIGITAL BANKING

We fully realize that Information Technology (IT) has evolved into the backbone of business progress in the digital era. Hence, we support the Board of Directors' efforts as they work on their commitment to strengthen IT capabilities through the preparation of a comprehensive IT Master Plan or IT Strategic Plan for the 2024-2028 period, which will supersede the period 2022-2025 and align with the 2024-2028 corporate plan.

We are sure that with this Master Plan, BNI can optimize the use of technology to support operations, increase efficiency, encourage innovation, and align with its strategies and stated business goals. We saw that until December 2024, BNI had made 93.23% progress on the strategic IT projects the Board of Directors had set for implementation in 2024. This notable achievement reflects that the Board's commitment has been successful in making the implementation of IT integrated into BNI's business strategy.

We will continue encouraging the Board of Directors to strengthen the Bank's information technology infrastructure, as it perfectly aligns with the global financial services trend towards digital finance. We further hope that BNI will continue to innovate to provide the best banking digital services and take the lead in this domain.

To that end, we will lend our full support to the Board of Directors' efforts as they work to provide added value to customers through some adopted key technologies to significantly contribute to the needs of BNI's digital banking product and service development in recent years.

BUSINESS PROSPECTS IN 2025 AND OUTLOOK ON BNI'S PERFORMANCE PROJECTION IN THE NEXT YEAR

The year 2025 expects prolonged geopolitical tension and regression in China's economic growth, which will loom over global economic conditions. In addition, the leadership change in major economic countries, such as the United States, will also affect the world economic outlook. The IMF projects global economic growth in 2025 to rise slightly compared to 2024.

The Indonesian economy's growth is projected at 4.9-5.4%, which is moderate compared to its partner countries. However, the projected growth will be higher than China (4.5%), Thailand (3.0%), and Malaysia (4.4%) but below India (6.5%), the Philippines (6.1%), and Vietnam (6.1%). This growth will be largely driven by increased consumption and stronger investments in line with the new government's policies that directly target improvements in public consumption.

In the context of the banking industry, Bank Indonesia estimates that bank credit will grow in the range of 9.0-12.5% in 2025 as investment increases, demand for working capital grows, and consumption strengthens. Furthermore, accommodative macroprudential policies should help channel bank credit. The economic risk will come from the global or external side, so the estimated Rupiah exchange rate against the US Dollar will be in the range of IDR15,000 - IDR16,200, which is influenced by the still high global risk, especially the potential for inward-looking policies after Donald Trump was elected US

president. Hence, 2025 will see limited space for lowering the benchmark interest rate globally and domestically.

Having learned of the uncertain macroeconomic outlook, the Board of Commissioners believes that the Bank's policies, as outlined by the Board of Directors in the Bank's Business Plan, remain on-track and promising, consistent with the Bank's goals and direction. We also see how the Board of Directors pays close attention to basic assumptions and economic projections and combines them with positive policy strategies. We are confident that with its optimized strengths, BNI will continue to deliver strong growth in the future.

VIEW ON THE IMPLEMENTATION OF BANK GOVERNANCE

We realize that Governance or GCG is key to ensuring sustainable business performance. Hence, we support internalizing the Indonesian Corporate Governance Principles in every BNI business activity. The Governance Principles include the rights of shareholders and stakeholders and their fulfillment, basic rules on management, and oversight of corporate management in Indonesia, including aspects of ethics, risk management, and disclosure.

We see how the implementation of Governance within BNI continues to improve over time. We also support the Board of Directors' efforts, from developing to updating policy instruments to evaluating and monitoring governance. This reflects the Board's commitment to applying Governance principles and practices in all elements of the Bank's operations and business.

One important aspect of successfully implementing governance principles is the strong synergy and collaboration between our support functions and those of the Board of Directors. The support functions allow us to implement and monitor all aspects of implementing governance principles, from compliance, risk management, and audits to the development of HR and information technology, which are the foundations for realizing bank accountability.

To support the implementation of GCG principles, BNI has more than 50% independent parties sitting on its Board of Commissioners. As a majority, Independent Commissioners can encourage the Board to act transparently, objectively, actively, and constructively to protect the interests of BNI and all stakeholders.

The successful implementation of Governance within BNI is also reflected in the GCG self-assessment assessment for the first semester of 2024 and the second semester of 2024, which is ranked 2 (Good), as well as awards and appreciation from external parties for the implementation of Governance throughout 2024, namely:

1. Leadership in Corporate Governance in the implementation of GCG based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesia Institute for Corporate Directorship (IICD).
2. The Most Trusted Company in Corporate Governance Perception Index (CGPI) from The Indonesia Institute for Corporate Governance (IICG) 2.

This award shows that corporate governance at BNI has been implemented by upholding ethical behavior, accountability, transparency, and sustainability. Moreover, we continue to mandate the Board of Directors to pay attention to the key components of Governance implementation to which we have paid special attention, including risk management, internal control systems, and whistleblowing systems.

INTERNAL CONTROL SYSTEM AND RISK MANAGEMENT

We recognize that that the internal control system and risk management are essential factors in running a banking business. In our view, BNI has an adequate internal control system that aligns with its business profile. BNI's internal control has been functioning effectively as an important component of the Bank's management while serving as the bedrock for the Bank's healthy and safe operational activities.

During the year 2024, the Board of Commissioners supervised the implementation of the internal control system by approving the General Policy on Risk Management and the General Policy on Internal Control System. The Board of Commissioners also supervised the implementation of risk management in all Financial Services Institutions (LJKs) of the Financial Conglomerate by approving the General Policy on Integrated Risk Management.

In terms of risk management, the Board of Commissioners is actively involved in all supervision of the implementation of risk management by the Board of Directors. The Board of Commissioners is of the view that BNI has carried out risk management in a proactive, forward-looking, and documented manner through the risk management process, including risk identification, measurement, monitoring and control. The availability of an effective internal control system is essential to ensure that the risk management process has been carried out in an organized, efficient manner and in accordance with applicable regulations. Control activities are carried out by fulfilling the principle of segregation of duties to ensure that no individual has full control over a transaction or process to prevent potential abuse. BNI's risk management implementation is supported by the availability of a competent and experienced risk management team.

In 2024, based on the review and discussion of the Board of Commissioners with management, internal auditors, all committees under the Board of Commissioners, and independent auditors, the Board of Commissioners is of the view that BNI has good risk management adequacy. BNI's risk management has run adequately as reflected in the results of BNI's Risk Profile assessment for the period of December 31, 2024 at Rank 2 and BNI's Bank Health Level is ranked "Healthy."

IMPLEMENTATION OF WHISTLEBLOWING SYSTEM (WBS)

The implementation of the Whistleblowing System (WBS) aims to detect early and prevent suspected irregularities or violations in every aspect of the Bank's business activities. WBS enables a reporting mechanism that guarantees the confidentiality of the whistleblower. WBS is a form of active participation by BNI personnel, partners, and other external parties in reporting alleged violations within the BNI environment. A well-functioning WBS creates a transparent, high-integrity, honest, and responsible work climate.

BNI has implemented "WBS to CEO" mechanism as one of its early detection mechanisms for WBS implementation. To strengthen the existing WBS, BNI has appointed an external party, Deloitte, to manage WBS reports and encourage BNI personnel to report any violations or indications of fraud. Thus, the purpose of WBS to create a clean, integrity-based work environment gains more effective and independent.

Furthermore, since March 2, 2021, BNI has collaborated with the Corruption Eradication Commission (KPK) on the handling of complaints in efforts to eradicate corruption, the implementation of which is reported periodically to the KPK.

Our role in BNI's management of the WBS system is assisted by the Audit Committee, whose oversight ensures a professional and transparent reporting system. We work closely with the Audit Committee and some other units to continuously evaluate and follow up on reports received. Based on the audit results, reports that are proven to be accurate will be followed up with administrative sanctions in the form of a Warning Letter to Termination of Employment (PHK) or other actions, including transfers and counseling.

Throughout 2024, there were 296 reports of alleged violations received through the WBS mechanism, with the most received via e-mail. The reports of violations have been followed up with an investigation process carried out by the Internal Audit Unit (IAD) and/or Senior Operational Risk Executive (SORX)/Anti-Fraud Unit (AFR) or related Divisions/Units. 83.45% of all reports, or 247 reports submitted through the WBS mechanism, have completed the investigation process and were given strict sanctions.

We believe the WBS implementation at BNI in 2024 went exceptionally well. The achievements that have been achieved to date indicate a relatively high level of awareness from all BNI personnel of the existence and benefits of WBS as a tool for improving the implementation of bank governance. Nevertheless, we will continue to provide guidance to the Board of Directors to ensure that the WBS implementation continues to increase employee understanding and concern about reporting violations and eventually create a conducive and high-integrity work environment.

FREQUENCY AND METHODS OF GIVING ADVICE TO BOARD OF DIRECTORS

We provide advice and suggestions to the Board of Directors through our meetings, meetings with our supporting committees, written directions and opinions, and our occasional work visits.

1. The Board of Commissioner Meetings
   We hold our meetings either internally or by inviting the Sector Director or Senior Executive Vice President related to the meeting agenda, as well as our regular meetings with the Board of Directors.
2. Meetings of Committees under the Board of Commissioners
   The active role of our supporting committees in assisting and supporting us with our duties, involves the implementation of committee meetings and evaluations, studies or reviews of matters that are the duties of the Board of Commissioners.
3. Written Directions and Opinions
   The provision of written directions and opinions from us to the Board of Directors in response to reports on the implementation of the Board of Directors' duties, requests for approval or consultation submitted by the Board of Directors and information regarding strategic and significant issues.
4. Board of Commissioners Working Visits
   Our working visits to BNI's work units, as well as providing direction and opinions to the Board of Directors based on the results our visits.

Throughout 2024, we held 53 (fifty-three) meetings, both internally and meetings where we invited the Director or Senior Executive Vice President. We also held 7 joint meetings with the Board of Directors. All meetings were held effectively, with high frequency and attendance level of the Board of Commissioners and the Board of Directors.

ASSESSMENT OF COMMITTEES UNDER THE BOARD OF COMMISSIONERS

Committees Supporting the Board of Commissioners

- Audit Committee
- Risk Monitoring Committee
- Nomination & Remuneration Committee
- Integrated Governance Committee

Our oversight duties and functions over the management of BNI are supported by the Audit Committee, Risk Monitoring Committee, Nomination & Remuneration Committee, and Integrated Governance Committee. We appreciate the four committees' support in improving our duties and functions. During 2024, the Audit Committee, Risk Monitoring Committee, Nomination & Remuneration Committee, and Integrated Governance Committee performed well and upheld high competency and quality standards. We base this assessment on, e.g., the realization of the fulfillment of each committee's duties in accordance with the Committee Charter, competency and skills, performance achievements in 2024, and members' attendance.

The Audit Committee monitored and evaluated internal control and effectively assisted us in overseeing the implementation of internal and external audit functions, including reviewing financial information to be issued by BNI to the public and/or related authorities. In carrying out its duties, the Audit Committee has held meetings with the Board of Commissioners and meetings by inviting the Sector/Field Director, Internal Audit, External Audit, and other related divisions and working together with other committees.

The Risk Monitoring Committee performed its duties, among others, reviewing and recommending aspects of governance and risk management within BNI, including integrated risk management. Meanwhile, the Nomination & Remuneration Committee performed its duties including overseeing the nomination and remuneration policies at every level of the organization, from the Board of Commissioners, Board of Directors and employees in accordance with applicable provisions.

Meanwhile, the Integrated Governance Committee provided valuable input on the oversight exercised on the implementation of Integrated Governance in the BNI Financial Conglomerate, including the implementation of the Integrated Governance Guidelines, the quality of the implementation of the integrated compliance function, the quality of integrated internal control, the implementation of integrated risk management, the quality of the implementation of integrated governance by evaluating the structure, process, and results of integrated governance, the effectiveness of integrated governance results by monitoring integrated financial performance, as well as the synergy plan for BNI and subsidiaries and synergy between subsidiaries.

SUSTAINABILITY ASPECT SUPERVISION AND SUPPORT FOR THE IMPLEMENTATION OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

In recent years, BNI has shown extraordinary efforts to shape a green industrial ecosystem in Indonesia, especially through Green Bond-based capital and Sustainability-Linked Loan (SLL) funding, as well as special financing schemes with attractive pricing for green financing. We warmly welcome and encourage BNI to improve its initiatives.

We give high appreciation and lend our full support for various efforts to implement BNI's sustainability and sustainable finance aspects that have grown through multiple programs and initiatives that focus on the BNI Sustainability Pillar. During 2024, we assessed that the Board of Directors was successful in continuing the Social and Environmental Responsibility (TJSL) program and developing Environmental, Social, and Governance (ESG) aspects systematically and in an integrated manner to ensure the implementation, achievement of success, and management of program impacts in accordance with priorities and/or targeted achievements.

We sincerely hope that BNI's strong performance in 2024 can be consistently implemented and improved in the coming years, so that net zero Greenhouse Gas (GHG) emissions targets and Sustainable Development Goals (SDGs) that have become a global issue and the agenda of the Indonesian Government can be achieved.

CHANGES IN THE COMPOSITION OF THE BOARD OF COMMISSIONERS

During 2024, there was 1 (one) change to the composition of the Board of Commissioners with the aim that the Board of Commissioners could continue to maximize their supervisory and advisory functions even better. The changes were made based on the decision of the Annual GMS on March 4, 2024, dismissing Susyanto with honor. On behalf of the Board of Commissioners and BNI Hi-Movers, we would like to express our gratitude and high appreciation for his dedication and devotion to the progress of BNI. The Annual GMS also dismissed and then reappointed Askolani as Commissioner for the second term, as well as appointing Mohamad Yusuf Permana as a new member of the Board of Commissioners.

Thus, the composition of the Board of Commissioners as of December 31, 2024 is as follows:

Name	Position	Basis of Appointment	Term of Office	Effective Date of Appointment*)
Pradjoto	President Commissioner/ Independent Commissioner	Decision of the Extraordinary GMS dated September 19, 2023	2020-2025[1)] (First Period)	February 19, 2024
Pahala Nugraha Mansury	Vice President Commissioner	Decision of the Extraordinary GMS dated September 19, 2023	2023-2028 (First Period)	February 19, 2024
Sigit Widyawan	Independent Commissioner	Decision of the Annual GMS dated March 15, 2023	2023-2028 (Second Period)	March 15, 2023
Askolani	Commissioner	Decision of the Annual GMS dated March 4, 2023	2024-2029 (Second Period)	March 4, 2024
Asmawi Syam	Independent Commissioner	Decision of the Annual GMS dated February 20, 2020	2020-2025 (First Period)	June 17, 2020
Septian Hario Seto	Independent Commissioner	Decision of the Annual GMS dated February 20, 2020	2020-2025 (First Period)	August 14, 2020
Iman Sugema	Independent Commissioner	Decision of the Annual GMS dated February 20, 2020	2020-2025 (First Period)	August 14, 2020
Erwin Rijanto Slamet	Independent Commissioner	Decision of the Annual GMS dated March 29, 2021	2021-2026 (First Period)	August 6, 2021

Name	Position	Basis of Appointment	Term of Office	Effective Date of Appointment*)
Fadlansyah Lubis	Commissioner	Decision of the Extraordinary GMS dated August 31, 2022	2022-2027 (First Period)	December 23, 2022
Robertus Billitea	Commissioner	Decision of the Annual GMS dated March 15, 2023	2023-2028 (First Period)	September 11, 2023
Mohamad Yusuf Permana	Commissioner	Decision of the Annual GMS dated March 4, 2024	2024-2029 (First Period)	September 2, 2024

[1)] Following his previous term as Vice President Commissioner/Independent Commissioner, 2020-2025

As of December 31, 2024, until the signing of this annual report, there had been no change in the composition of the Board of Commissioners.

APPRECIATION AND CLOSING

We remain optimistic that BNI, under the current management and administration of the Board of Directors, can deliver more strongly through the effective strategic policy execution and consistent implementation of the Governance pillars. We will continue to mandate that management and all BNI Hi-Movers work together and synergize with all other stakeholders to provide the best banking services beyond what our customers have come to expect.

On behalf of all members of the Board of Commissioners, we would like to thank the Board of Directors, management, and all BNI Hi-Movers employees for their hard work throughout 2024. Our appreciation also extends to all partners, shareholders, and other stakeholders. We hope that all of BNI's achievements in 2024 will serve as the foundation for sustainable growth.

Jakarta, February 19, 2025
On behalf of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk,

Pradjoto
President Commissioner/Independent Commissioner

Board of Commissioners



Robertus Billitea
Commissioner

Fadlansyah Lubis
Commissioner

Askolani
Commissioner

Septian Hario Seto
Independent Commissioner

Iman Sugema
Independent Commissioner

Pradjoto
President Commissioner/
Independent Commissioner



Pahala Nugraha Mansury
Vice President
Commissioner

Asmawi Syam
Independent Commissioner

Mohamad Yusuf Permana
Commissioner

Sigit Widyawan
Independent Commissioner

Erwin Rijanto Slamet
Independent Commissioner



ROYKE TUMILAAR
President Director

Board of Directors' Report

Our key strategy execution and ongoing transformation have positively impacted BNI's performance growth. By the end of 2024, BNI recorded solid and sustainable financial performance growth.

DEAR SHAREHOLDERS AND STAKEHOLDERS,

Let us first thank God the Almighty, for if it wasn't for His grace and guidance, we all wouldn't have been able to navigate the various challenges and business dynamics throughout the challenging year 2024. It is an honor for me, on behalf of my fellow directors, to deliver the annual report of PT Bank Negara Indonesia (Persero) Tbk. While the achievements BNI delivered this year in business and operations deserve our appreciation, let us also learn from such a valuable experience.

It came as no surprise to see the immediate impacts of the current global and domestic challenges on the banking industry in general. As many would expect, the persistent geopolitical tension panned out into a major issue that quite negatively affected the balance of the world's economic chain. The situation became worse due to a defensive policy the United States was imposing on its financial sector, which eventually triggered capital flight in the capital and financial markets around the globe, including China, as the country was grappling with regressing economic growth, with spillover effects on Indonesia's banking sector.

Under such a difficult circumstance, BNI has sought to continue to perform well through its transformation programs and selective and measurable growth strategies. The solid financial performance we delivered for BNI in 2024 shows that we were able to meet the different aspirations of shareholders, investors, and stakeholders. We've also successfully aligned the transformation process with our planned targets, allowing us to deliver strong results in BNI's banking and business management.

GLOBAL AND NATIONAL ECONOMY AND BANKING INDUSTRY IN 2024

Throughout 2024, the global economy was still marked by geopolitical turmoil and some interesting phenomena that ensued. The first one was the difference in economic growth trajectories amongst developed nations. The US showed higher-than-expected economic growth, far outpacing its European counterparts, such as Germany and the UK, as both had to see a regression in growth rate. The second was the more prevalent economic slowdown in China on the domestic demand side, as indicated by weak data on consumption

(slowing inflation, declining retail sales), which prompted many global institutions to project that the country would only grow below 5% in the mid-term. Third, the economic growth trajectory of Southeast Asian countries experienced a different momentum as countries whose production value chains were closer to the global market tended to grow above expectations. The last phenomenon was the increasingly higher geopolitical risks that created global uncertainty, especially after the election of Donald Trump as the US president. The current dynamics of US politics have raised market concerns over the more protectionist or inward-looking policies the new president is likely to impose during his administration.

Obviously, the volatile global economic landscapes had lagged effects on the financial market, such as tight liquidity conditions and a more limited decline in BI's benchmark rate as the rupiah remained under pressure. Furthermore, the geopolitical uncertainty that persisted throughout 2024 prompted global investors to take a cautious approach (wait and see) to economic expansion. The election of US President Donald Trump has also led to a general view in the market over the potentially higher inflationary risks that could hold back the Federal Reserve from commencing its long-planned low-rate regime.

In the domestic context, it is safe to say that economic growth remained strong and resilient at around 5%, driven by government spending (7.5% YoY until the end of September 2024), construction investment, and downstream mining activities. With such economic drivers, credit growth reached 10.4% YoY in December 2024, although third-party fund growth (TPF) only reached 4.5% YoY (December 2024). This condition caused the banking industry's loan-to-deposit ratio (LDR) to reach 89%, higher than the end of 2023 of 84%. BI has provided a macroprudential liquidity incentive (KLM) policy to support credit distribution to focus loans on priority sectors.

An issue that emerged as a challenge for the Indonesian economy in 2024 was the tendency of household consumption to remain low (below 5%) as the year progressed, indicating that it had not reached the pre-pandemic growth rate. The moderate growth in household consumption reportedly had to do with the stagnant purchasing power of certain groups, as reflected by the low core inflation. One of the challenges in the banking industry was the persistently high global rate regime, which translated this year into an equally high rate environment with tight liquidity and rather sharp market volatility.

GLOBAL AND NATIONAL ECONOMY AND BANKING INDUSTRY IN 2024

Throughout 2024, we kept ourselves observant of the dynamic macroeconomic conditions and the spillover effects they might have on the banking business as we worked to mitigate their impacts on our strategic policy execution, business achievements, and sustainability, as we already have in our long-term plans.

The Company's long-term plan has been stated in the BNI Corporate Plan document for 2024–2028 where BNI aspires to become a Bank with leading HR and technology in serving customers by 2028. The strategic direction is a unique value proposition that BNI plans to build in the future by focusing on 3 (three) areas: Productivity, Platform, and Proposition. Based on the 2024-2028 Corporate Plan, the Company's focus in 2024 was to continue improving productivity through capability development, role redesign, optimizing office networks and analytics, and building and improving platforms to improve services and client experience. This focus was stated in 6 (six) main strategies in 2024, as given below:

1. Increasing the expansion of top tier customer business by strengthening risk management.
2. Improving the digital platform to optimize transactional banking and cross-selling that focuses on increasing sustainable AUM, CASA and FBI.
3. Strengthening business networks through outlet optimization.
4. Developing international business networks to support global market penetration.
5. Strengthening human capital and IT to increase productivity.
6. Optimizing the BNI Group to strengthen the position of its Subsidiaries.

Into the fourth year, 2024, BNI continued to make transformations consistent with its predetermined key strategies. We make this transformation program more than just an initiative. It is a grand stride that marks our dedication and commitment to continuing to grow, develop, and adapt to changes at the national and global levels. The results are also reflected in the increasing level of profitability, including the Return on Equity (ROE) ratio. BNI recorded an ROE of 14.2% in 2024, an increase of

11.8% from 2.6% in 2020. BNI managed to deliver this achievement amidst the increasing value of capital or equity, portraying an increase in a sustainable business's profitability level.

The focus of the 2024 transformation was to increase productivity aspects by increasing the role of frontline (Customer Service and Tellers) in supporting marketing, strengthening marketing staff (sales), and implementing a sales generalist model in all regional offices and branches, whose objective was for BNI to deliver optimal, responsive services, and consistently offer need-based solutions for the customers while developing digital services to support the customer journey. In 2024, the Company released a transaction application for personal customers built using the latest technology platform, **wondr by BNI**. Coinciding with BNI's 78th Anniversary, wondr by BNI was launched on July 5, 2024, built with in-depth research, following industry excellence standards not only in Indonesia, but also following global standards, and hence, projected to be a game changer for BNI and the entire Indonesian banking industry. We are grateful that wondr by BNI has been well accepted by the public. Until the end of December 2024 or 6 months after its release, wondr by BNI had been downloaded by 6.1 million users. One encouraging indicator for us was the high level of active users making transactions, the proportion of which has increased by ~65% compared to the previous BNI Mobile Banking, indicating high enthusiasm from customers for this digital application.

In October 2024, the Company also brought transformation to its BNIdirect, a digital platform designed for wholesale customers. This service now offers an integrated portal, including Cash Management, Receivables, Trade, and Value Chain, in one platform. Throughout 2024, BNIdirect was used by more than 173 thousand users, with more than a 30% increase in transactions and a 20% larger transaction volume compared to the previous year's figures, respectively. The noticeable increase in the number of transactions then contributed significantly to the acquisition of current account funds from companies and institutions that were the Company's wholesale customers.

The Company's other transformation also ran sustainably. BNI strives to build a more agile, collaborative, and careful work pattern in managing risk to ensure each business segment grows measurably. Through network expansion and enhanced international business capabilities, it has also consistently assumed a more significant role as an orchestrator of Indonesian business to the global market. BNI is now present in 8 world financial centers, including Singapore, Hong Kong, Tokyo and Osaka (Japan), New York (United States), Seoul (South Korea), London (England), Amsterdam (Netherlands), and has just opened an office in Sydney, Australia, in September. Besides overseas branches, the Company has also built strong partnerships with more than 1,300 correspondent banks in more than 90 countries, covering transactions in 16 currencies. The Company also plays an important role as a global payment gateway by collaborating with more than 100 remittance companies in more than 20 countries. The establishment of a Multinational Corporation (MNC) & International Desk at the Head Office, which is connected to all Overseas Offices is one of the Company's competitive advantages in attracting and facilitating foreign investment to Indonesia.

The execution of our key strategy and ongoing transformation has had a positive impact on BNI's performance growth. Until the end of 2024, BNI was able to deliver solid and sustainable growth in finances. You can see this in the key leading indicator, which is larger credit distribution, especially in the back half of the year. The credit acceleration in 2024 was enabled by a growth of 17.6% YoY in financing to top-tier debtors in the corporate segment to IDR441 trillion from blue chip corporations, both private and state-owned enterprises. The consumer segment grew 14.5% YoY to IDR142.5 trillion, which was contributed mainly by the growth of personal loans and mortgages. Another segment that showed growth was the commercial segment, which grew by 5.7%. Meanwhile, the small segment was still focused on fundamental improvements, namely improving asset quality.

The role of subsidiaries has become more visibly stronger. We have used synergy under BNI Group as one of the key strategies for sustainable performance. Amongst the ongoing synergies was joint financing

cooperation with BNI Finance through auto loan products and with hibank, which is projected as BNI's future growth engine in the MSME segment by utilizing the BNI Group ecosystem. In 2024, credit and financing disbursed by subsidiaries reached IDR16.2 trillion, or increased by 79.7% YoY.

BNI caught the slipstream of the nation's improved banking operating environment and its steady economy amidst highly dynamic global conditions to accelerate credit growth, primarily since Bank Indonesia (BI) provided incentives in the form of relaxation of the obligation to fulfill the Minimum Reserve Requirement (GWM) in rupiah to banks that distribute credit or financing to certain sectors effective June 1, 2024.

BNI has capitalized on this incentive to expand the scope of priority sectors of the Macroprudential Liquidity Policy (KLM), since such policy package also covers the automotive, trade, electricity, gas, water, social services, creative economy, and green financing sectors, in addition to the previously existing non-mineral, housing, and tourism downstream sectors. Utilizing this incentive has presented additional liquidity that banks can optimize to increase credit distribution to the communities. The Company has responded to the provision of this incentive with an improved funding structure by increasing the proportion of healthy and sustainable retail funds to improve the Cost of Funds (CoF).

We can see the improvement in the proportion of retail funds in the noticeable 11% growth of savings, a record high in BNI's history. BNI's proven ability to maintain savings growth amidst liquidity challenges reflects the Company's competitiveness in facing economic challenges, both domestically and globally.

BNI's healthy and sustainable third-party fund has been largely contributed to the growth of retail savings and the funding structure transformation program, contributing to the 4.2% Net Interest Margin (NIM) ratio BNI registered in 2024. In addition, its accelerated business resulted in quarterly Net Interest Income (NII) growth, allowing BNI to deliver IDR40.4 trillion in total NII. The strong top-line figure was also driven by an increase of 11.9% YoY in non-interest income to IDR24 trillion as transactions in BNI's digital platform continued to increase.

Asset quality showed constant improvements along with prudent credit acceleration, as reflected in the 2% lower figure of the Non-Performing Loan (NPL) ratio and the 10.3% and 1.1% declines of Loan at Risk and credit costs, respectively.

The combination of accelerated credit growth, increased fee-based income, and consistent improvement in asset quality has driven BNI to achieve a profit attributable to owners of the parent entity as a reference profit for dividend distribution to shareholders in 2024, reaching IDR21.5 trillion, up 2.7% from IDR20.9 trillion a year earlier. This profit achievement was in line with market expectations.

We succeeded in maintaining fundamental ratios, which indicated that our strategies and policies worked well. The loan-to-deposit ratio (LDR) in 2024 was 96.1%, an increase compared to 85.8% in the previous year. The noticeable increase shows the effective role of intermediation within the corridor regulated by the regulator. Another thing we successfully maintained was our capital structure, as BNI registered a Minimum Capital Adequacy Ratio (KPMM) of 21.4% in 2024. Associated with this stronger capital structure was BNI's success in sustainably increasing its profitability. We will remain committed to maintaining the positive momentum of this performance as we go forward, e.g., considering likely persistent demand for loans, especially in the corporate segment, in addition to the more expansive monetary and fiscal policies in 2025.

OUR ROLE IN THE FORMULATION OF STRATEGIES AND STRATEGIC POLICIES

As the Board of Directors, we play an essential role in formulating strategies and strategic policies, which we periodically specify under the Bank Business Plan (RBB) every year and report to the Financial Services Authority (OJK). The preparation of this RBB also refers to the 5-year Corporate Plan on the Bank's stated vision and mission as the main foundations. We prepare the Corporate Plan and RBB under the direction of and oversight exercised by the Board of Commissioners and align them with the aspirations of shareholders, both majority shareholders through the Ministry of State-Owned Enterprises (KBUMN) and minority shareholders through the optimization of the investor relations function.

All relevant units in their respective functions must implement the results of BNI's strategic policy formulation. As stated in the Guidelines and Work Procedures, we shall assume an active role in ensuring that each unit understands the main tasks and functions they must carry out to ensure they can achieve the predetermined work plans. Another role we assume as the Board of Directors is a strategic decision maker, especially for matters that need decision-making at the highest level, from product development, business expansion, marketing, and sales to risk management and aspects of Bank Governance.

We then outline all the reported strategies and strategic policies in the RBB as Key Performance Indicators (KPI), where we are directly connected to various important achievements therein. This involves engaging ourselves in designing and formulating BNI's strategic strategies and policies while making all the necessary efforts to bring to life the design and formulation of the Bank's strategic policies. The entire process of strategy formulation and our involvement in these strategic policies should prove BNI's commitment to upholding the principle of prudence and the implementation of Good Corporate Governance (GCG).

HOW WE RUN THE PROCESS TO ENSURE STRATEGY EXECUTION

To ensure the seamless execution of strategies and policies, we give our management team the necessary directions for them to apply the strategy design and formulation. We have also initiated BNI Corporate Transformation since 2021 to ensure that the strategic direction in the Company's 2024-2028 Corporate Plan is executable and remains within the planned targets using a project management approach. In its execution, the transformation program is run in several phases or waves, with each wave consisting of a number of projects with a clear and workable work plan. This approach is applied in order to increase the success rate of the Company's transformation program.

In mid-2023, we decided to apply a New Way of Working (NWOW) that was leaner, more agile, and more customer-centric. In 2024, we improved the way we implemented the NWOW in such a way that it aligned the agile, accountable, and collaborative work culture and organizational design with other aspects of the business, from adequate functions without duplication, coordination mechanisms, and processes within the BNI organization, leadership-based competency development, to Key Performance Indicators (KPIs) at all levels of the organization.

We also play a rigorous role in ensuring that all designs, formulations, and targets contained in the RBB are not only consistent with expectations but also comprehensible and applicable. Top-down and bottom-up policies in the decision-making process are developed according to their portion and perspective, hoping that various innovations can be initiated at the lowest ranks, including the involvement of committees and all of our supporting organs. However, we still reserve the authority to ensure that every decision made complies with applicable rules and is goal-oriented. To ensure strategy execution and performance monitoring run well, we have set up a Corporate Planning & Performance Management function at the division level and are periodically involved in running several committees at the Board's level, such as the Performance Management Committee, Subsidiary Committee, Business Committee, Asset & Liability Committee, Technology Management Committee, Integrated Risk Management Committee, Credit Committee, Credit Policy Committee, and Human Capital Committee. [ACGS D.1.5, D.1.6]

TARGETS VERSUS REALIZATION IN 2024

Information about the success of the strategy that was planned at the beginning of the year can be seen in the highlights of BNI's achievements in the list of targets vs. realizations as given below.

Subject	2024 Realization	2024 Target	2024 Target Achievement (%)
Credit Distribution (in IDR million)	775,872	774,977	100.1
Third-Party fund collection (in IDR million)	805,511	856,642	94.0
Non Performing Loan (NPL) Gross (%)	2.0	1.9	105.3
Net Income (in IPD million)	21,464	21,244	101.0
Return on Asset (ROA) (%)	2.5	2.4	104.2
Return on Equity (ROE) Equity Based (%)	14.2	14.2	100.0
Net Interest Margin (NIM) (%)	4.2	4.0	105.0
Operating Expenses to Revenue (BOPO) (%)	70.0	70.3	99.6
Minimum Capital Adequacy Ratio (KPMM) (%)	21.4	20.3	105.4

More detailed information about the 2024 target versus realization is available in the "Management Analysis and Discussion" chapter of this annual report. In general, we managed to deliver against our predetermined targets, as BNI exceeded its business expansion target with strong credit distribution and third-party fund collection. What we see as another driver of this strong achievement was the healthy and quality asset foundation we've built, which allowed BNI to register a lower-than-target NPL in 2024.

The Company was also successful in effectively maintaining cost and expense ratios. We had lower-than-target Operating Expenses to Income (BOPO). Further, we healthily managed the Net Interest Margin (NIM). This achievement generated solid performance, as reflected in the profitability indicators, including net profit, ROA, and ROE, where we beat the predetermined targets. This shows BNI's ability to determine business growth targets and pair them with effective strategic initiative management as we continue to execute our efficiency strategies to create added value for profitability.

In terms of capital, BNI's capital management strategy was reflected in its achieved capital structure target, where the 2024 KPMM ratio showed above-target achievements. The achievement of the fairly positive target for KPMM was attributed to BNI's improved performance over the past few years.

OBSTACLES, CHALLENGES, AND ANTICIPATIONS

Throughout 2024, BNI encountered various challenges after BI raised its rate again to 6.25% in April before finally reducing it to 6.00% in December and pausing it there in December. The high-rate regime had a lot to do with the central bank's focus on maintaining the stability of the Rupiah exchange rate amidst the persistent global uncertainty. Facing these conditions, BNI continued to strive to provide credit to customers by making some anticipations, including:

1. Implementing an end-to-end credit process in strengthening risk management and improving risk culture.
2. Offering ecosystem businesses and financial solutions to institutional customers, Diamond Clients, prime customers, and selected universities.
3. Increasing credit growth in the small segment with a focus on export-oriented MSMEs through the BNI Xpora program and digital business through synergy with subsidiaries.
4. Increasing wealth business through the development of attractive investment services and products.
5. Collaborating with fintech, e-commerce, and other digital platforms to expand customer access to a completer and more interconnected financial ecosystem.
6. Encouraging cross-sector collaboration, such as agribusiness, education, and health services, to provide financial solutions that support the specific needs of market segments.

BNI also continued, in a selective way, the execution of its 2024 Credit Distribution Strategy, which involved focusing on Corporate debtors and priority sectors, value chains, and cross-selling by prioritizing risk culture. In addition, BNI continued to optimize the provision of funds/financing to related parties and Subsidiaries for business expansion. The focus of the 2024 investment strategy was on improving credit quality by prioritizing risk culture and sustainable business expansion with several initiatives, including:

1. Increasing business expansion in Corporate debtors and priority sectors, value chains, and cross-selling by prioritizing risk culture.

2. Increasing RM productivity, including through RM re-allocation.
3. Strengthening quality acquisitions in the Consumer Segment through payroll loans in potential segments (e.g. white collar) and mortgages and focusing on areas with high business potential.
4. Improving the quality of pipeline management across all segments.
5. Strengthening Risk management through improving the capabilities of Risk Culture, Risk Assessment RM and End to End Credit Process tools, especially in the SME and Commercial segments.
6. Making more business penetration across all segments by collaborating to explore branch business potentials with Head Office-Regional channel synergy.
7. Optimizing digitalization in Branches and Shifting to Digital to increase customer transactions.
8. Increasing sustainable international business through cross-border solutions & advisory (Trade, Xpora, Diaspora, Investment & Transaction).

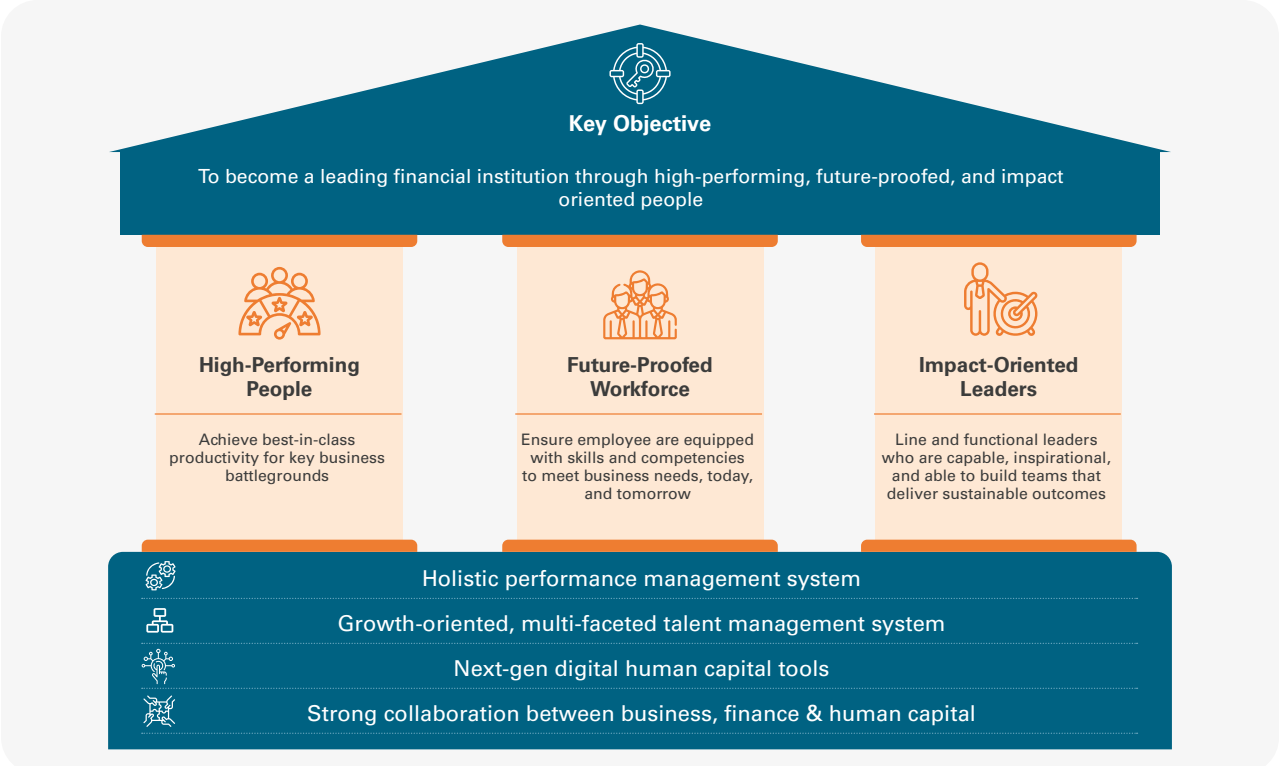
HUMAN RESOURCE MANAGEMENT

BNI always shows its commitment to realizing the vision of "Becoming the Leading Financial Institution in Sustainable Service and Performance." As part of this strategy, BNI has prepared a Human Capital (HC) Roadmap that is integrated into its Corporate Plan. This roadmap offers strategic guidance to ensure effective, adaptive, and appropriate future need-driven human resource management.

BNI's HC Roadmap focuses on three main pillars:
1. High-Performing People: Building productive employees with optimal performance in every function and responsibility.
2. Future-Proofed Workforce: Preparing employees with relevant skills and competencies to meet current and future business needs.
3. Impact-Oriented Leaders: Developing competent, inspiring leaders who are able to create a positive impact on the team and the company.

As the foundation of the three pillars, BNI also integrates holistic performance management, a growth-oriented – multi-faceted talent management system, the latest human capital technology, and an operating model that supports close collaboration between business units, finance, and human capital.

The implementation of the HC Roadmap ensures that Human Capital Management at BNI aligns with industry best practices to provide added value to the company's business. BNI is optimistic that with such a clear roadmap, it can sustainably drive the achievement of its strategic vision and goals.



Management realizes that employee welfare is key to creating a productive and sustainable work environment. Therefore, BNI strengthens employee welfare initiatives through the BNI Holistic Employee Wellbeing Program, which covers three main aspects:

1. Mental and Physical Health
   BNI has a welfare program that supports employee mental and physical health, including consultation services through a digital application that is accessible at any time. This program provides personal support for each employee to improve their mental and physical condition according to their needs.
   In addition, BNI provides BNI Little Explorer Daycare, a full-service childcare facility, to support employee welfare and productivity, especially female employees.
2. Financial Health
   BNI launched a financial consultation service for employees through an application that provides personal financial planning guidance. This program aims to improve financial literacy, create financial stability, and support employee productivity.
   In addition, BNI also has a Retirement Health Fund (DKMP), a program that aims to ensure continuous health protection for employees after the end of their employment period.
3. Social Health
   To support the balance between work and personal life, BNI has formed hobby and interest communities through 46 Societies. More than 25 active communities provide opportunities for employees to excel, collaborate, and maintain mental and physical health.

With the implementation of this program, BNI is optimistic that it can create a healthy, comfortable work environment that supports long-term productivity.



BNI also routinely holds employee training and competency development programs. We run the programs to improve employee knowledge and insight, which will enable them to respond to developments and challenges in the banking industry. BNI University serves as the mandate holder in employee competency development management, strategy development, and designing various training programs, including training programs that improve competency to manage BNI and can meet employee competency needs. Throughout 2024, BNI organized various education and training programs for 272,351 participants, meaning that, on average, each employee was enrolled in 10 training sessions.

UTILIZATION OF INFORMATION TECHNOLOGY AND DIGITAL BANKING

We always focus on various strategic policies and initiatives to improve business processes, system availability, and development of Information Technology (IT) for digital enablers, infrastructure, communication networks, and digital product services of the Bank that align with the development of the banking industry. IT development also aims to refresh infrastructure, including systems and networks, in order to support increased transactions and strengthen cybersecurity capabilities.

In the era of digital banking, BNI closely monitors the distribution of effective and efficient service networks and focuses on transferring customer banking transactions to digital channels, especially the use of Wondr by BNI as its latest mobile banking service super app, with new features that can meet various financial needs of retail customers. Since its launch in 2024, wondr by BNI has been downloaded over 6.1 million times, with an increasing number of active users transacting at around 65%, surpassing its predecessor, BNI Mobile Banking. This shows evidence of BNI's commitment to continue to be the main transaction platform of choice for customers.

While wondr by BNI has shown positive performance, its current mobile banking application is still operating with a total of 18.1 million customers as registered users. We will continue to strive to encourage a gradual migration process so customers can gradually switch to wondr by BNI. The sole objective is to ensure that all BNI customers can have a better and more personalized service experience with wondr by BNI.

In addition to the transaction platform for retail customers, BNI continues to improve digital services for the wholesale segment by transforming the BNIdirect platform. The new BNIdirect is designed to provide a more efficient and comprehensive transaction experience with features that can provide customers with a comprehensive and real-time picture. Clear data visibility makes it easier to access relevant information and ultimately supports more accurate financial planning and analysis. All of these features are supported by automation and service integration, which significantly increases operational efficiency and provides stability in every transaction. With this approach, BNIdirect strengthens its role as a reliable digital financial solution for wholesale customers.

Throughout 2024, BNIdirect recorded solid performance as its users grew 14.2% YoY to reach 173,000 users. Of that figure, the transaction volume generated from this platform has increased significantly, growing 23.3% YoY. This achievement further confirms BNIdirect's position as a trusted and relevant digital solution for wholesale customers.

As part of BNI's digital transformation, BNIdirect makes continuous innovations to meet customer needs by offering excellent solutions such as cash management, supply chain, global trade, and foreign exchange. This success reflects BNI's commitment to becoming a strategic partner for business customers while cementing its position as a leading digital banking service provider in Indonesia. In 2024, BNI has also completed the process of transforming hibank, which resulted from the acquisition of Mayora Bank to become the first digital Bank in Indonesia to focus on the SME segment. hibank continues to strengthen its intermediation by empowering the targeted community ecosystem. By December 2024, hibank's credit portfolio recorded significant growth of 75.5% annually (YoY). This strong growth was driven by a significant contribution from the MSME segment, with credit distribution increasing by 78% compared to December 2023. In addition, the number of hibank MSME debtors increased significantly by 60 times compared to December 2023.

DEVELOPMENT OF NETWORK AND BUSINESS PARTNERS

With a grand vision as a national bank with global capacity, BNI is supported by strategic alliances and correspondent bank networks overseas. BNI has continued to expand its network both in national coverage and global networks by utilizing networks and customers as well as business partners as target markets. Further, BNI has also established other collaborations to expand the business and improve performance sustainably.

By the end of 2024, BNI had 1,780 outlets (KC and KCP), 13,388 ATMs (including overseas ATMs), and 213,370 Branchless Banking agents (BNI Agen46) across Indonesia. Throughout 2024, BNI also proceeded with the transition of its super flagship, business flagship, digital first and thematic outlet formats, which offer a faster, unique, and complete banking experience for customers.

In supporting inclusive finance, BNI Agen46 is spread across 34,241 sub-districts/villages throughout Indonesia, including areas categorized as Frontier, Remote and Disadvantaged (3T). In 2024, BNI Agen46 recorded a transaction volume of IDR51.97 trillion with a total of 79.35 million transactions.

OTHER PERFORMANCE

Organizational Structure

Organizational structure is essential to stay abreast of business expansion and changes and achieve a goal. BNI has always strengthened its organizational structure, as reflected in the Company Profile of this Annual Report, through the process of identifying and developing successors. BNI also continuously evaluates the organizational structure to improve effectiveness, efficiency, and ensure long-term business continuity.

BNI continuously organizes and evaluates the organization to support and align with BNI's vision, mission, and future strategic direction. One of the transformation initiatives that has an impact on the organizational restructuring and how the organization works is the implementation of the New Way of Working (NWOW). The initiative has been carried out since 2023, and was further improved in 2024. Meanwhile, BNI's organizational development in 2024 focused on the following aspects:

1. **Strengthening the Head Office Organization**
   Implementation and refinement of the Head Office organizational function that supports business functions, risk, IT enablers, and operations with due consideration of collaboration, business process excellence and strong risk mitigation and management for faster, leaner, and more accurate process. The Head Office Organization is strengthened to optimize business through top tier clients using value chain and cross selling concepts to ensure derivative businesses are comprehensively worked on.
2. **Strengthening the Regional Office Organization**
   Implementation and refinement of the Regional Office organizational function to support business with strong risk management, and strengthening the execution of value chains and cross selling prioritized from top tier clients. This is supported by strengthening the business network (outlets) with digitization to facilitate customer transactions.
3. **Strengthening the Function of Overseas Offices**
   Developing and strengthening international business networks to support global market penetration by restructuring the functions and organizations of Overseas Offices (KLN). IT is adjusted to the potential and optimization and strengthened the alignment function between the Head and branch offices.
4. **Development of Agile and Lean Organizations**
   Development of Agile and Lean organizations that support BNI's strategy to respond to potential, challenges, and rapid and dynamic internal and external changes.The Agile and Lean organizations is implemented by making work patterns simpler and reducing layers and span of control to increase employee productivity.

Main Activities and Types of Products and Services Offered

BNI's core business is to run banking services and conduct other supporting activities by collecting and providing funds for the community and offering competitive interest rates to customers. In carrying out these core activities, BNI provides various banking products and services, including credit distribution to small and medium business debtors, as discussed in the Company Profile chapter under Products and Services Produced.

Interest Rate for Fund Raising and Provision

The interest rate for BNI's rupiah-denominated fund raising and provision in 2024 was as follows:

(effective % per year)

Month	Prime Lending Rate Based on Type of Credit						
	Non MSME Loan		MSME Loan			KPR/KPA	Non KPR/ Non KPA
	Corporate	Retail	Medium*	Small*	Micro		
January 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
February 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
March 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
April 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
May 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
June 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
July 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
August 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
September 2024	8.63%	8.79%	9.80%	10.43%	11.61%	9.11%	10.45%
October 2024	8.71%	8.88%	9.83%	10.46%	11.62%	9.13%	10.47%
November 2024	8.56%	8.72%	9.71%	10.47%	11.59%	9.03%	10.35%
December 2024	8.80%	9.00%	9.96%	10.85%	11.89%	9.32%	10.69%

*There is a new segmentation in September 2024

Number, Type, and Location of Offices

To support an effective and optimal business expansion strategy, BNI runs office/outlet network management. BNI runs it to make its existing network more effective and efficient in accordance with the business potential in the area where the network is located. Until now, BNI has continued to improve customer experience in order to support business growth with the offerings of a variety of comprehensive products and services through 1 (one) head office, 17 regional offices, 10 (ten) overseas office networks, and 1,838 office networks consisting of branch offices, sub-branch offices, and business centers. Of the total 10 (ten) overseas office networks, there are 6 (six) overseas offices, 1 (one) sub-branch, 1 (one) remittance branch office, and 2 (two) representative offices spread across 8 (eight) countries.

Ownership of the Board of Directors, Board of Commissioners, and Shareholders in the Bank Business Group

In 2024, information about the shareholding (direct and indirect) of incumbent members of the Boards of Commissioners and Directors and newly appointed members in the financial year mirrors that available in the Company Profile Chapter of this Annual Report.

SIGNIFICANT CHANGES THAT OCCURRED IN THE BANK AND BANK BUSINESS GROUP

Throughout 2024, there were no significant changes that occurred in BNI or the BNI Business Group.

BUSINESS PROSPECTS 2025, ECONOMIC DEVELOPMENT, AND TARGET MARKET

We see that the continuous internal improvements and changes that we are making through BNI Corporate Transformation to ensure sustainable improvements in the Bank's performance are already on the right track in many aspects. Hence, we wouldn't be over-optimistic if we said we envisioned a brighter business outlook for BNI, for we believe that we can deliver more strongly by seizing various emerging opportunities while adapting to increasingly complex changes in the business environment in the future.

However, we should also remain observant of global and national economic developments and pair those approaches with the right strategies and policies to deliver more robust achievements in the future.

The IMF projects global economic growth in 2025 to be relatively the same as in 2024, namely 3.3% (2024: 3.2%). Several risks, such as geopolitical risks, changes in leadership and policies of major economic countries, and the slowdown in the Chinese economy, are among the future global financial risks.

Domestically, Indonesia expects an economic growth rate of 5%, the same pace it had expected to see at the closing of 2024. The growth will be driven by higher household consumption and more robust investment. We also expect an increase in household consumption as the lagged impacts of fiscal policy have directly improved people's purchasing power and household consumption.

The Rupiah is estimated to hover at around IDR15,000-IDR16,200 in 2025. Another pressing issue on the Rupiah besides Indonesia's widening account deficit will be the increasingly strong US dollar.

We have identified some economic risks as BNI moves forward. The first is the risk of growth momentum should manufacturing activity not improve. Second is the economic slowdown in Indonesia's main trading partners, such as China. The third will be a deeper slowdown in the Chinese economy due to the US's aggressive import tariff policy, which can potentially cause Indonesia's economy to slow, given the significant concentration of the economy with China. Furthermore, structural issues in China, such as a declining productive population, a property sector crisis, and high private debt to GDP (reaching around 190% of GDP), can affect the country's economic growth in the medium term. Fourth are geopolitical factors to global economic growth, including relations between countries - Russia, Ukraine, and NATO countries, and countries in the Middle East - as well as changes in leadership in major countries, which can bring different global policies. Fifth and finally, BNI is also aware of the declining economic growth from a structural perspective, as it can be caused by the unavailability of adequate employment and an increase in the informal economy.

With all global and national macroeconomic conditions carefully estimated, BNI targets to grow at a realistic figure in the future. Achieving this target will involve continuing to implement previous strategies and policies. BNI will also continue to focus on optimal liquidity management, sustainable credit growth, and consistency in maintaining asset quality, which will drive BNI's performance towards becoming more solid.

DEVELOPMENT OF BANK GOVERNANCE IMPLEMENTATION

The implementation of Governance or what is referred to nowadays as corporate Governance has become a commitment for all members of the Boards of Commissioners and Directors, as well as all BNI Hi-Movers. We consistently and continuously implement the 4 pillars of Indonesian Governance consisting of Ethics, Transparency, Accountability, and Sustainability (ETAK) to support the Bank's performance and achieve its business prospects. The four pillars serve as references for responsible decision-making, help avoid conflicts of interest, optimize performance, and increase accountability.

The implementation of Governance within BNI also refers to the Regulation of the Minister of SOEs No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises, giving BNI high standards to meet the aspirations of shareholders.

Periodically, BNI carries out Governance socialization for all employees and all stakeholders, either through appeals, meetings, sharing sessions, webinars, delivery of modules/materials, training, signing of integrity pacts, or installation of outdoor media and publications in the mass media. This socialization should provide understanding and awareness to all stakeholders, especially BNI Hi-Movers of how to apply business ethics in the BNI environment.

In 2024, BNI made several assessments, such as self-assessments included in the measurement of Bank Health Level or assessments from independent parties, with the following achievements:

1. Self-assessment included in the measurement of Bank Health Level
   This assessment is made based on OJK Regulation No. 4/POJK.03/2016 concerning the Assessment of the Health Level of Commercial Banks; OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks; OJK Circular Letter No. 13/SEOJK.03/2017 concerning Implementation of Governance for Commercial Banks. BNI's self-assessment is made every semester, in June and

December. Both assessments in 2024 showed a composite score of 2 with a stable trend, reflecting that BNI management has very well implemented Governance in general. The results of self-assessments are also one of the points in the Bank Health Level assessment;

2. ASEAN Corporate Governance Scorecard (ACGS) assessment by the Indonesia Institute for Corporate Directorship (IICD)
   In 2024, the results of the ACGS assessment showed that BNI's overall weighted score was 115.56 points and was included in the predicate "Leadership in Corporate Governance" or Level 5, which means that BNI's overall GCG practices have adopted international standards. This achievement has increased compared to 2023, where BNI scored 108.39 also with the predicate "Leadership in Corporate Governance";
3. Corporate Governance Perception Index (CGPI) assessment by The Indonesian Institute for Corporate Governance (IICG)
   In 2024, in CGPI assessment, BNI earned a score of 92.45 that made it named amongst "The Most Trusted Companies", an increase compared to the CGPI assessment in 2023 where it earned a score of 92.26, also falling under "The Most Trusted Companies" predicate.

The three assessments gave BNI input to make continuous improvements in the future and strengthen the implementation of the Governance pillars into a better one. In particular, management emphasizes integrity as the key to implementing governance principles and practices. Management is committed to continuing to cultivate integrity as an inseparable part of developing HR competencies and capacities because only with integrity can the BNI achieve its stated vision and mission as an organization.

RISK MANAGEMENT AND BANK HEALTH LEVEL

Bank Health Level is the result of Risk Based Bank Rating and Bank performance. BNI uses the Bank Health Level parameter to identify problems early, prepare and implement corrective actions, and determine future business strategies.

BNI's Health Level Assessment refers to OJK Regulation No. 4/POJK.03/2016 concerning the Assessment of the Health Level of Commercial Banks and OJK Circular Letter No. 14/SEOJK.03/2017 concerning the Assessment of the Health Level of Commercial Banks based on the following 4 (four) factors:

1. Risk Profile
   The Risk Profile Assessment is carried out by assessing the Inherent Risk (risk inherent in BNI's activities) and the Quality of Risk Management Implementation (KPMR) against 8 (eight) types of risk.
2. Governance (Good Corporate Governance)
   The Corporate Governance Assessment is an assessment of the quality of BNI's management in implementing the principles of Corporate Governance.
3. Earnings
   The assessment of the Earnings factor includes an evaluation of the Earnings performance, Earnings sources, Earnings sustainability, and Earnings management.
4. Capital
   The assessment of the Capital factor includes an evaluation of the adequacy of Capital and the adequacy of Capital management. In assessing the adequacy of Capital, BNI links capital adequacy with its Risk Profile.

BNI assesses the Bank's Health Level and reports it to the Financial Services Authority (OJK) every 6 (six) months (semesterly) for the June and December periods. In the period of December 31, 2024, the results of the BNI Bank Health Level assessment were ranked "Healthy," meaning that:

1. The Bank's condition is generally healthy and considered capable of facing significant negative impacts from changes in business and other external factors.
2. The ratings of the assessment factors (Risk Profile, Governance, Earnings, and Capital) are generally good. If there are weaknesses, they are considered insignificant in general.

BNI's risk profile, as one of the TKB assessment factors for the period of December 31, 2024, was ranked 2 (Low to Moderate).

PERFORMANCE ASSESSMENT OF BOD SUPPORTING COMMITTEES

In line with BNI's business needs and all regulatory provisions, we have set up our supporting Committees to assist us with our executive and managerial duty as we work to create operational effectiveness and efficiency.

Board of Directors Supporting Committee

- Credit Committee
- Credit Policy Committee
- Business Committee
- Asset & Liability Committee
- Integrated Risk Management Committee
- Risk Management and Anti-Fraud Committee
- Human Capital Committee
- Performance Management Committee
- Technology Management Committee
- Subsidiary Company Committee

We have evaluated the performance of these committees. We thought that our supporting committees did a great job in their respective duties and functions, consistent with their respective objectives. This assessment was based on, among other things, the realization of the fulfillment of the duties of each committee in accordance with the Committee Charter, competencies and skills, performance achievements in 2024, and members' attendance in meetings.

SUSTAINABLE FINANCE INITIATIVES AND THE IMPLEMENTATION OF ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) AND COMMITMENT TO SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Sustainable Finance Initiatives, the implementation of Environment, Social, and Governance (ESG), and an unwavering commitment to Social and Environmental Responsibility (TJSL) are an integral part of BNI's long-term business strategy since they ensure business sustainability and adherence to globally recognized sustainability principles. BNI takes these steps not only to improve its financial performance but also to make a positive contribution to society at large and the surrounding environment.

BNI has integrated initiatives to implement sustainable finance principles into its fundamental business. In 2021, BNI issued a five-trillion-rupiah Green Bond, rated "idAAA" by PEFINDO, and a Second Party Opinion from Sustainalytics. From the credit business side, BNI has broadened its sustainable portfolio by introducing a Sustainability Linked Loan (SLL), where we offer incentives for our eligible customers who have proven to have improved their business conduct in terms of ESG aspects. In addition to SLL, BNI offers a unique financing scheme with attractive prices for green financing, which aims to create a positive and sustainable impact on other industrial sectors. Further, BNI has sought to reduce its emissions to contribute to realizing the net zero emission agenda in 2060.

As one of the pioneers of Green Banking in Indonesia, BNI is committed to internalizing sustainable finance principles in its values, work culture, strategies, operational policies, and operational systems and procedures. BNI puts this commitment to work by executing a strategy that is integrated with all aspects of Environmental, Social, and Governance (ESG) performance and positively impacts stakeholders and the environment.

BNI, being one of the agents of development in Indonesia, never wavers in its commitment to implementing ESG, particularly in the green transition. BNI sees how the need for a green transition has become one of the must-do initiatives to secure a sustainable future.

As climate change challenges and the need for more sustainable resources increase, the Indonesian Sustainable Finance Taxonomy (TKBI) has become a key pillar on which we direct our investments towards sustainable projects that have meaningful impacts on society.

The regulator has prepared the sustainable taxonomy to support the development of national and international sustainable finance and answer challenges associated with managing and financing climate change, transitioning to Net Zero Emissions (NZE), and exerting efforts to achieve the Sustainable Development Goals.

BNI knows that the imposition of the TKBI recently passed in 2024 requires support from every player in the financing business circle as they move towards the same transition to realize the Government's predetermined NDC targets, prompting BNI to call for the participation of all its debtors engaged in the energy sectors in the BNI ESG Sustainability & Transition (BEST) Event held on September 24, 2024, which shared all the information and the role of businesses in this domain.

To overcome various obstacles located during the TKBI classification process, BNI held a TKBI Technical Workshop on December 11, 2024 as an interactive forum for discussions to enhance the comprehension of every business player of the concept and objectives of TKBI while offering technical guidance in how to fill out the TKBI questionnaire correctly.

BNI's risk management strategy in making a green transition covers the implementation of the Climate Risk Stress Test or CRST, which was reported in July 2024 as one of the efforts of the Climate Risk Management System (CRMS) to assess the impact of climate change risk on the bank's portfolio. CRST has been carried out on 50% of BNI's credit portfolio across all segments, covering 6 (six) selected industrial sectors and property ownership credit (BNI Griya).

BNI knows very well that the transition process needs significant capital and investment support. Hence, BNI distributes Sustainability Linked Loans, which are financing programs for debtors who have sustainability targets in accordance with their business strategies and have been endorsed by the Second Opinion Party, an independent institution.

BNI has 5 (five) Pillars of Sustainability as a form of commitment to sustainability, which is compiled based on its stated mission. The Five Pillars of Sustainability constitute BNI's support for the Sustainable Development Goals which include BNI for Indonesia, BNI for Customers, BNI for the Environment, BNI for the Community, and BNI for Employees.



In its commitment to implementing Social and Environmental Responsibility (TJSL), BNI interprets TJSL not only as regulatory compliance but also as its Sustainability Pillar on which to build harmonious and mutually beneficial relationships with the environment, community, and stakeholders, both locally, nationally and globally and giving positive influence on the mindsets of Indonesians while growing together with them. BNI refrains from running TJSL programs that only look to improve its corporate image in the eyes of the community and the business environment. BNI sees understanding the objectives of the TJSL programs and their resultant positive impacts as its key objectives to achieve the ideal, objective, targeted, and sustainable TJSL implementation objectives, consistent with the concept of sustainable finance to achieve sustainable development goals.

BNI executes TJSL strategies and runs programs therein with due reference to the concept of sustainable finance, which is designed to respect and consider the expectations of stakeholders, regulatory compliance, and consistency with international behavioral norms. To continuously evaluate and strengthen the implementation of sustainability, BNI also conducts an ESG implementation assessment from Morgan Stanley Capital Investment (MSCI), with a current BBB Rating that points to strong workforce management, corporate behavior, and data privacy & security, and maintains Medium Risk from the Sustainalytics ESG Risk Rating.

CHANGES IN THE COMPOSITION OF THE BOARD OF DIRECTORS

To ensure that BNI remains competitive and regulatory compliant while able to respond to changes in the dynamic banking business, BNI changed the composition of its Board of Directors based on the Annual General Meeting of Shareholders (AGM) on March 4, 2024. The GMS honorably dismissed from their respective positions: Ms. Adi Sulistyowati, Deputy President Director; Mr. Sis Apik Wijayanto, Director of Enterprise and Commercial Banking; Mr. Muhammad Iqbal, Director of Institutional Banking; and Mr. Silvano Winston Rumantir, Director of Wholesale and International Banking. We, along with all BNI Hi-Movers, would like to express our gratitude for the dedication and devotion they have provided to the advancements of BNI.

The GMS then assigned Mr. Putrama Wahju Setyawan, previously Director of Retail Banking, as Deputy President Director; and Ms. Corina Leyla Karnalies, previously Director of Digital and Integrated Transaction Banking, as Director of Retail Banking. The 2024 Annual GMS also appointed Mr. Hussein Paolo Kartadjoemena as Director of Digital and Integrated Transaction Banking; Mr. I Made Sukajaya as Director of Enterprise and Commercial Banking; Mr. Munadi Herlambang as Director of Institutional Banking; and Mr. Agung Prabowo as Director of Wholesale and International Banking. On behalf of the Board of Directors and BNI Hi-Movers, we welcome and congratulate all new members of the Board of Directors, and are confident that the incumbent Board of Directors has the capacity to bring BNI forward towards a more sustainable performance.

Hence, the Board of Directors until December 31, 2024 had 12 (twelve) members consisting of 1 (one) President Director, 1 (one) Deputy President Director, and 10 (ten) Directors.

Name	Position	Basis of Appointment	Term of Office	Effective Date of Appointment*)
Royke Tumilaar	President Director	Decision of the Extraordinary GMS held on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Putrama Wahju Setyawan	Deputy President Director	Decision of the Extraordinary GMS held on August 31, 2022	2022-2027 (First Period)	September 2, 2024
Novita Widya Anggraini	Finance Director	Decision of the Extraordinary GMS held on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Corina Leyla Karnalies	Retail Banking Director	Decision of the Annual General Meeting of Shareholders held on February 20, 2020	2020-2025 (First Period)	June 25, 2020
David Pirzada	Risk Management Director	Decision of the Extraordinary GMS held on September 2, 2020	2020-2025 (First Period)	November 30, 2020
Ronny Venir	Network and Services Director	Decision of the Extraordinary GMS held on September 2, 2020	2020-2025 (First Period)	November 5, 2020

Name	Position	Basis of Appointment	Term of Office	Effective Date of Appointment*)
Mucharom	Human Capital and Compliance Director	Decision of the Extraordinary GMS held on August 31, 2022	2022-2027 (First Period)	December 19, 2022
Toto Prasetio	Technology and Operations Director	Decision of the Extraordinary GMS held on August 31, 2022	2022-2027 (First Period)	January 31, 2023
I Made Sukajaya	Enterprise and Commercial Banking Director	Annual General Meeting of Shareholders held on March 4, 2024	2024-2029 (First Period)	September 2, 2024
Hussein Paolo Kartadjoemena	Digital & Integrated Transaction Banking Director	Decision of the Annual General Meeting of Shareholders held on March 4, 2024	2024-2029 (First Period)	September 2, 2024
Agung Prabowo	Wholesale and International Banking Director	Decision of the Annual General Meeting of Shareholders held on March 4, 2024	2024-2029 (First Period)	October 9, 2024
Munadi Herlambang*)	Institutional Banking Director	Decision of the Annual General Meeting of Shareholders held on March 4, 2024	2024-2029 (First Period)	-

*) Has not been effective

From December 31, 2024 until the signing of this annual report, there were no changes to the composition and structure of the Board of Directors.

APPRECIATION AND CLOSING

To conclude, the Board of Directors would like to express our gratitude and appreciation to the Board of Commissioners for their continued suggestions, directions, and advice given to us. We also express the same appreciation to all shareholders, customers, and business partners for their support, trust, and cooperation we have established with them. Our appreciation also goes to all BNI Hi-Movers for their shown commitment, dedication, and passion as they carried out their respective duties and responsibilities and supported all of the measures BNI undertook to achieve its stated Vision, Mission, and Business Plan in 2024.

We would also like to express gratitude to all other stakeholders for their excellent cooperation we have built with them, which has allowed us to sustain the business amidst increasingly more severe challenges. In the future, we are optimistic that all of these achievements will serve as the basis on which BNI can further optimize its potential and deliver the best performance. May we always be bestowed by God Almighty with blessings, perfection, and ease in whatever step we take as we work to bring BNI forward as the Indonesian economy grows.

Jakarta, February 19, 2025
On behalf of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk,



Royke Tumilaar
President Director

Board of Directors



Munadi Herlambang*
Institutional Banking Director

I Made Sukajaya
Enterprise & Commercial Banking Director

Ronny Venir
Network & Services Director

Agung Prabowo
Wholesale & International Banking Director

Corina Leyla Karnalies
Retail Banking Director

Royke Tumilaar
President Director

* Has not been effective



Putrama Wahju Setyawan
Deputy President Director

Novita Widya Anggraini
Finance Director

Toto Prasetio
Technology &
Operations Director

David Pirzada
Risk Management Director

Mucharom
Human Capital &
Compliance Director

Hussein Paolo Kartadjoemena
Digital & Integrated Transaction
Banking Director

Board of Commissioners' Responsibility Statement for the 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk

We the undersigned, Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk hereby declare that we have reviewed and approved the 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk and declare that all information in the Annual Report is presented in its entirety, and that we take full responsibility for the correctness of the contents of this Annual Report.

This statement is hereby made in all truthfulness.

Jakarta, February 19, 2025

Board of Commissioners

Pradjoto
President Commissioner/Independent Commissioner

Pahala Nugraha Mansury
Vice President Commissioner

Sigit Widyawan
Independent Commissioner

Askolani
Commissioner

Asmawi Syam
Independent Commissioner

Septian Hario Seto
Independent Commissioner

Iman Sugema
Independent Commissioner

Erwin Rijanto Slamet
Independent Commissioner

Fadlansyah Lubis
Commissioner

Robertus Billitea
Commissioner

Mohamad Yusuf Permana
Commissioner

Board of Directors' Responsibility Statement for the 2024 Annual Report of PT Bank Negara indonesia (Persero) Tbk

We the undersigned, Board of Directors of PT Bank Negara Indonesia (Persero) Tbk hereby declare that we have reviewed and approved the 2024 Annual Report of PT Bank Negara Indonesia (Persero) Tbk and declare that all information in the Annual Report is presented in its entirety, and that we take full responsibility for the correctness of the contents of this Annual Report.

This statement is hereby made in all truthfulness.

Jakarta, February 19, 2025

Board of Directors

Royke Tumilaar
President Director

Putrama Wahju Setyawan
Deputy President Director

Novita Widya Anggraini
Finance Director

Corina Leyla Karnalies
Retail Banking Director

David Pirzada
Risk Management Director

Ronny Venir
Network & Services Director

Mucharom
Human Capital & Compliance Director

Toto Prasetio
Technology & Operations Director

I Made Sukajaya
Enterprise & Commercial Banking Director

Hussein Paolo Kartadjoemena
Digital & Integrated Transaction Banking Director

Agung Prabowo
Wholesale & International Banking Director

Munadi Herlambang*
Institutional Banking Director

* Has not been effective

03

Company Profile

General Company Information	80
Company Identity	83
Brief History of the Company	84
Vision, Mission, and Corporate Culture	86
Lines of Business	90
Company Operational Areas	94
Organizational Structure	96
Association Membership List	98
Board of Commissioners' Profiles	100
Board of Directors' Profiles	114
Information on Changes in the Composition of Members of the Board of Directors and/or Members of the Board of Commissioners that Occurred after the Financial Year	129
Senior Executive President Profiles	130
Executive Officers Profiles	134
Employee Demographics	156
Shareholder Structure and Composition	168
Information on the Company's Majority and Controlling Shareholder	174
List of Subsidiaries and/or Associated Entities	176
Corporate Group Structure	188
Share Listing Chronology	190
Other Securities Listing Chronology	192
Information on Public Accountants, Public Accounting Firms, and Networks/ Associations/Alliances	202
Capital Market Supporting Institutions and/ or Professionals	202
Information Available on The Website	205
Awards and Certification	208



Company Profile


BNI

General Company Information [ACGS B.5.1]

Serving the Country, the Pride of the Nation

Company Name
PT Bank Negara Indonesia (Persero) Tbk

Nick Name
BNI

Information on Name Change
There were no name changes in the 2024 fiscal year.

Domicile
Jakarta

Business Activity
Banking and Other Supporting Business Activities.

Business Segments
- Wholesale & International Banking
- Treasury
- Institutional Banking
- Enterprises & Commercial Banking
- Retail Banking
- Head Office
- Subsidiaries and Share Ownership through Subsidiaries

Date of Establishment
July 5, 1946

Legal Basis of Establishment
- Government Regulation in Lieu of Law No. 2 in 1946
- Republic of Indonesia State Gazette No. 70 of 1968
- UU No. 17 of 1968 concerning Bank Negara Indonesia 1946
- PP No. 19 of 1992 concerning Adjustment of the Legal Form of Bank Negara Indonesia to Become a Limited Liability Company (Persero)
- Deed of Establishment: Notarial Deed No. 131 dated July 31, 1992

Total Assets 2024
IDR1,129,805,637,256,520.00

Authorized Capital
IDR15,000,000,000,000.00

Issued and Fully Paid Capital
IDR9,054,806,974,125.00

Listing Date on Indonesia Stock Exchange
November 25, 1996

Ticker Code
BBNI

Share Ownership
- Republic of Indonesia 60%
- Public 40%

Number of Employees
- 2023: 27,570 people
- 2024: 27,203 people

Office Network 2024
- 1 Head Office
- 17 Region Offices
- 197 Branch Offices
- 1,583 Sub-Branch Offices
- 20 Commercial Business Centers
- 26 Retail Productive Business Center
- 12 Consumer Credit Processing Centers
- 13,388 ATM/CRM (including 10 ATM/CRM Overseas)
- 330 BNI DigiCS
- 6 Subsidiaries
- 2 Share Ownership through Subsidiaries
- 10 Overseas Office Networks

More detailed information on the office network can be found in the Business Areas Map, and Names and Addresses of Subsidiaries, Associated Entities, Branch Offices, Overseas Representative Offices, and Regional Offices in the Company Profile Chapter in this Annual Report.

BNI Agen46
157,632 (2021)
164,979 (2022)
185,697 (2023)
213,370 (2024)

Subsidiaries
- PT BNI Multifinance
- PT BNI Sekuritas
- PT BNI Life Insurance
- BNI Remittance Ltd.
- PT Bank Hibank Indonesia
- PT BNI Modal Ventura

Share Ownership through Subsidiaries
- PT BNI Asset Management
- BNI Securities Pte. Ltd.

Gratification & Anti-Bribery Complaints
Compliance Information Management System (CIMS) at www.cims.bni.co.id

Whistleblowing System
Telephone : 021 - 57853377
Website : http://bni-transparan.tipoffs.com.sg
E-mail : bni-transparan@tipoffs.com.sg
Letter : BNI Transparan, P.O. BOX 2646, JKP 10026
SMS/WhatsApp : 0811-970-1946

ACCESS TO THE COMPANY INCLUDING BRANCH OFFICES OR REPRESENTATIVE OFFICES NETWORK

HEAD OFFICE

Grha BNI
Jl. Jenderal Sudirman Kav. 1
Jakarta 10220
Tel. : (62-21) 251 1946
E-mail: bnicall@bni.co.id
PO Box 1946

Website
Website: www.bni.co.id

Company Contact
Corporate Secretary
Okki Rushartomo
Grha BNI 24th Fl.
Jl. Jenderal Sudirman Kav. 1
Jakarta 10220
E-mail: corporate.secretary@bni.co.id

Investor Relations
Investor Relations Division
Menara Astra 32nd floor
Jl. Jenderal Sudirman Kav 5-6
Jakarta 10220
Tel. : (62-21) 8665 6800
E-mail: ir@bni.co.id

Call Center
24 hour service BNI Call 1500046
Service Contact from Overseas:
+62-21-30500046

Social Media
X: @BNI
Facebook: BNI
Instagram: @bni46

REGIONAL OFFICES

Regional Office 01
Jl. Pemuda No. 12, 4th Floor
Medan 20151
Tel. : (061) 4567110, 4567002
Fax. : (061) 4567105, 4515754

Regional Office 02
Jl. Dobi No. 1, 3rd Floor Padang 25138
Tel. : (0751) 890005-08
Fax. : (0751) 890010-11

Regional Office 03
Jl. Jend. Sudirman No. 132
Palembang 30126
Tel. : (0711) 361961-65, 321046
Fax. : (0711) 361966, 374160

Regional Office 04
Jl. Perintis Kemerdekaan No. 3
Bandung 40117
Tel. : (022) 4240431-39, 4240534
Fax. : (022) 4240432-4214926-4213107

Regional Office 05
Jl. Letjen. M.T. Haryono No. 16
Semarang 50122
Tel. : (024) 3556747, 3556746
Fax. : (024) 3547686, 3520636

Regional Office 06
Jl. Jend. A. Yani No. 286
Gedung Graha Pangeran 3rd-4th Fl.
Surabaya 60292
Tel. : (031) 8292820 - 26
Fax. : (031) 8292805, 8292841

Regional Office 07
Jl. Jend. Sudirman No. 1, 3rd Fl
Makassar 90115
Tel. : (0411) 3620355-56, 3621926
Fax. : (0411) 3619562, 3625395

Regional Office 08
Jl. Raya Puputan Renon No. 27 2nd
Floor, Renon Denpasar 82265
Tel. : (0361) 263304 - 08
Fax. : (0361) 227874, 263319

Regional Office 09
Jl. Lambung Mangkurat No. 30
Banjarmasin 70111
Tel. : (0511) 3353689, 3357063
Fax. : (0511) 3354409, 3357066

Regional Office 10
Jl. Jend. Gatot Subroto No. 55
Central Jakarta 0210
Tel. : (021) 2500025, 5706057
(Hunting)
Fax. : (021) 2500033

Regional Office 11
Jl. Dotulolong Lasut No. 1
Manado 95122
Tel. : (0431) 868019, 862777
Fax. : (0431) 851852/865458

Regional Office 12
Jl. Lada No. 1 Jakarta 11110
Tel. : (021) 6901131, 2601090, 2601148
Fax. : (021) 6901131, 6901182,
2601165, 2601179

Regional Office 14
Gedung BNI Kantor Wilayah Jakarta
BSD, 7th Fl. Kav. Sunburst Lot.1-5
Jl. Pahlawan Seribu Lengkong Gudang
BSD City Kota Tangerang Selatan,
Banten
Tel. : (021) 80826860
Fax. : (021) 29514074

Regional Office 15
Gedung Jatinegara 88 Office
Jl. Jatinegara Timur No. 88
Jakarta Timur 13310
Tel. : (021) 22898972
Fax. : (021) 22898972

Regional Office 16
Jl. Kelapa II Entrop, Kota Jayapura
Papua 99224
Tel. : (0967) 5355311, 522354
Fax. : (0967) 533316

Regional Office 17
Jl. Trikora No. 1
Yogyakarta 55122
Tel. : (0274) 376287
Fax. : (0274) 2872414

Regional Office 18
Jl. Jend. Basuki Rahmat No. 75 – 77
Malang 65179
Tel. : (0341) 3611945-47
Fax. : (0341) 324565, 354767

OVERSEAS BRANCH OFFICES

SINGAPORE OVERSEAS OFFICE
BNI Tower
30 Raffles Place #26-01 & #27-01
Singapore 048622
Tel. : +65 6225 7755
Fax. : +65 6225 4757

HONG KONG OVERSEAS OFFICE
G/F Far East Finance Center,
16 Harcourt Road, Admiralty,
Central Hong Kong
Tel. : +852 25299871, 28618600
Fax. : +852 28656500

TOKYO OVERSEAS OFFICE
Nurihiko Building South Tower
1st & 9th Floor, 2-10-2 Kyobashi,
Chuo-ku, Tokyo 104-0031, Japan
Tel. : +81 3 5579 9990
Fax. : +81 3 3561 3331

LONDON OVERSEAS OFFICE
30 King Street, London EC2V 8AG
United Kingdom
Tel. : +44 20 7776 4646
Fax. : +44 20 7776 4699

NEW YORK OVERSEAS OFFICE
One Exchange Plaza 5th Floor,
55 Broadway New York NY. 10006 USA
Tel. : +1 212 943 4750
Fax. : +1 212 344 5723

SEOUL OVERSEAS OFFICE
The Korea Chamber of Commerce
& Industry (KCCI) Building
2nd & 5th Floor
39, Sejongdaero, Jung-gu, Seoul,
South Korea 04513
Tel. : +82 2 6050 1932/1946
Fax. : +82 2 6050 1929

OVERSEAS SUB-BRANCH OFFICES

OSAKA SUB BRANCH OFFICE
Tatsuno Honmachi Building 3rd Floor
3-5-2 Honmachi Chuo-ku Osaka,
541-0053, Japan
Tel. : +81 6 4963 2186
Fax. : +81 6 4963 2486

REMITTANCE CENTER

LIMITED PURPOSE BRANCH (LPB)
City Plaza
810 Geylang Road #01-100/101
Singapore 409286
Tel. : +65 6745 1946

REPRESENTATIVE OFFICE

REPRESENTATIVE OFFICE AMSTERDAM
World Trade Center (WTC) Amsterdam,
Tower C, 12th Floor,
Strawinskylaan 1251, 1077 XX
Amsterdam
Tel. : +31 618832758

REPRESENTATIVE OFFICE SYDNEY
30th floor Salesforce Tower,
Suite 30.1B.
180 George St, Sydney NSW 2000,
Australia

SUBSIDIARIES

PT BNI Multifinance
Graha Binakarsa 11th Floor Lot. E-F and
12th Floor, Jl. HR. Rasuna Said Kav.
C-18, Kuningan,
Jakarta Selatan 12940
Hotline : (021) 2519 5646
Website : www.bnimultifinance.co.id

PT BNI Sekuritas
Sudirman Plaza Indofood Tower
Lantai 16, Jl. Jend. Sudirman
Kav. 76-78 Jakarta 12910
Tel./Call Center : (021) 2554 3946
Fax. : (021) 5793 5831
E-mail : customercare@bnisekuritas.co.id
Website : www.bnisekuritas.co.id
customer care : 14016

PT BNI Life Insurance
Centennial Tower 10th Floor
Jl. Gatot Subroto Kav. 24-25
Jakarta 12930
Tel. : (021) 2953 9999
Fax. : (021) 2953 9998
Website : www.bni-life.co.id
E-mail : care@bni-life.co.id
Call Center : 1-500-045

BNI Remittance Ltd.
Shop 3, on GF, Keswick Court
No. 3 Keswick Street, Causeway Bay
Hong Kong
Tel. : +852 28908082
Fax. : +852 28908182

PT Bank Hibank Indonesia
Rajawali Place, 22nd-23rd Floor
Jl. H.R. Rasuna Said Kav.B4
Setiabudi, Jakarta Selatan 12910
Tel. : (021) 86657888/86657899
Website : www.hibank.co.id
E-mail : customercare@hibank.co.id
Call Center : 1500910

PT BNI Modal Ventura
Menara BNI 2nd Floor
Jl. Pejompongan Raya No.7,
Bendungan Hilir, Tanah Abang
Jakarta Pusat 10210
Website : www.bniventures.co.id

SHARE OWNERSHIP THROUGH SUBSIDIARIES

PT BNI Asset Management
Centennial Tower 19th Floor
Jl. Gatot Subroto Kav. 24-25
Jakarta 12930
Tel. : (021) 2996 9646
(021) 2996 9647
Website: www.bni-am.co.id
E-mail: customerservices@bni-am.co.id

BNI Securities Pte. Ltd.
BNI Tower
30 Raffles Place #26-01
Singapore 048622
Websites : https://bnisecurities.com.sg
E-mail: corporate.secretary@
bnisecurities.com.sg

Company Identity

Serving the Country, the Pride of the Nation

The Slogan "Melayani Negeri, Kebanggaan Bangsa" means "Serving the Country, the Pride of the Nation", and is the Bank's philosophy and vision to deliver a high impact that can be felt by all Indonesian people

As the first state bank in Indonesia that was established on July 5, 1946, and popularly known as BNI 46, the number 46 is chosen as the BNI Logo to further strengthen the corporate signature as a state-owned bank that has been in operation for 77 years. The color scheme in the BNI 46 logo is dominated by orange, symbolizing the spirit of BNI that continues to move forward to compete and be agile in capturing business opportunities in the digital era, so as to become a leading digital financial institution. Orange also illustrates the new passion, in which BNI always innovates continuously to serve all segments of Indonesian people. In addition, orange also conveys the message that BNI has a strong belief to achieve expectations and always shine throughout time. Meanwhile, the turquoise color on the BNI logo reflects the strength, authority and stability of BNI, as well as implies a unique and modern image.

Since 2021, BNI has established a value proposition as a provider of digital-based integrated financial solutions with international excellence. As a comprehensive and trusted Digital Financial Institution, BNI will continue to provide digital innovation experiences, both in terms of corporate and consumer banking, for people throughout the country as well as overseas.

Brief History of the Company

PT Bank Negara Indonesia (Persero) Tbk (hereinafter referred to as "BNI" was officially established by the Government of the Republic of Indonesia on July 5, 1946 through Government Regulation in Lieu of Law No. 2 of 1946 concerning the Establishment of Bank Negara Indonesia (BNI), referred to as the 1946 BNI Law dated July 5, 1946. Through this Regulation, BNI, which was previously named "Poesat Bank Indonesia" as a foundation legal entity, officially became "Bank Negara Indonesia" and carried out its functions as a circulation/central bank and a commercial bank.

As a circulation/central bank, BNI had the sole right to regulate the issuance and circulation of Oeang Republik Indonesia (ORI) within the boundaries of the territory of the Republic of Indonesia. Apart from its function as a circulation bank, Bank BNI also functioned as a commercial bank, continuing the work of the previous Poesat Bank Indonesia. The inauguration of BNI was held in Yogyakarta on the first anniversary of the Proclamation of Indonesian Independence on August 17, 1946. In the Round Table Conference, which ended on November 2, 1949, BNI's status as a Central Bank was removed and De Javasche Bank was designated as the Central Bank, while BNI was designated as a Development Bank.

On February 4, 1955, through Emergency Law No. 2 of 1955 concerning Bank Negara Indonesia, BNI was designated as a commercial bank. Then in 1961, this Emergency Law was enacted into law. Based on this law, BNI's duties and business activities were to assist and promote people's prosperity and national economic development.

In 1965, through Presidential Decree No. 17 of 1965 concerning the integration of State Commercial Banks and Bank Tabungan Pos into a single bank, BNI again underwent a name change to "Bank Negara Indonesia Unit III".

In 1968, through Law No. 17 of 1968, which specifically regulated the business activities of Bank Negara Indonesia, it stipulated that the official name "Bank Negara Indonesia Unit III" be changed to "Bank Negara Indonesia 1946". Through this law, BNI received a mandate to improve the people's economy and participate in national development.

In 1992, through Government Regulation No. 19 of 1992 dated April 29, 1992 concerning the Adjustment of the Legal Form of Bank Negara Indonesia 1946 to become a Limited Liability Company (Persero), BNI underwent an adjustment in its legal form to become a Limited Liability Company (Persero). Through Government Regulation No. 19 of 1922, Bank Negara Indonesia 1946 was declared dissolved with the provision that all rights and obligations, assets and employees of Bank Negara Indonesia 1946, which existed at the time of its dissolution, be transferred to the Limited Liability Company (Persero).

The adjustment of this legal form was also recorded as the initial milestone of the establishment of Limited Liability Company (Persero) Bank Negara Indonesia, where its establishment has the aims and objectives, as explained in Article 2, Chapter II, Government Regulation No. 19 of 1992, namely to conduct business in the banking sector in the broadest sense, and other businesses that support these business activities.

The adjustment in the legal form to a Persero was confirmed through Notary Deed No. 131, dated July 31, 1992, drawn up before Muhani Salim, S.H., and approved by the Minister of Justice of the Republic of Indonesia No. C2-6582.HT.01.01. TH.92 and announced in the Republic of Indonesia State Gazette No. 73 dated September 11, 1992 Supplement No. 1A.

In 1996, BNI listed its shares on the Jakarta Stock Exchange and the Surabaya Stock Exchange (now IDX), this step made BNI the first BUMN bank (State Owned Enterprise) to become a public company. The listing of shares on the Stock Exchange aimed to strengthen the financial structure and increase business competition in the banking world. Other corporate action steps taken by BNI included a recapitalization process by the Government in 1999, the divestment of Government shares in 2007, and a limited public offering in 2010.

On October 6, 2023, the Company carried out a Stock Split with reference to the Republic of Indonesia Financial Services Authority (FSA) Regulation No. 15/POJK.04/2022 concerning Stock Splits and Stock Mergers by Public Companies ("POJK No. 15/2022") after obtaining approval from the Extraordinary

GMS held on September 19, 2023. The Stock Split was carried out to increase demand for the Company's shares by expanding the investor base. Stock Split was carried out with a split ratio of 1:2.

By the end of 2024, the Government of the Republic of Indonesia owned 60% of BNI shares while the public, both individuals and institutions, had the remaining 40%, domestic and foreign. BNI is also supported by several subsidiaries to strengthen integrated financial services, including PT BNI Multifinance, PT BNI Sekuritas, PT BNI Life Insurance, BNI Remittance Ltd., PT Bank Mayora that was later renamed PT Bank Hibank Indonesia and PT BNI Modal Ventura on May 24, 2023.

Currently, BNI is listed as one of the largest national banks in Indonesia in terms of total assets, total credit, and total third-party funds. BNI continues to offer fund-saving services and loan facilities for corporations, medium-sized businesses, and small businesses. Some of the Bank's best products and services have been tailored to customer needs from childhood through teenage years, adulthood, and retirement.

CHANGE OF NAME

Until 2024, BNI has experienced 5 (five) name changes with detailed explanations in the following table:

No.	Name	Reason of Change	Effective Date of Name Change
1.	**Bank Negara Indonesia**	In 1946, through Government Regulation in Lieu of Law No. 2 of 1946, BNI's name was officially changed from "Poesat Bank Indonesia" to "Bank Negara Indonesia".	1946
2.	**Bank Negara Indonesia Unit III**	In 1965, BNI changed its name from Bank Negara Indonesia to "Bank Negara Indonesia Unit III" through Law No. 17 of 1965.	1965
3.	**Bank Negara Indonesia 1946**	In 1968, through Law No. 17 of 1968, the Government reorganized BNI's business activities and changed the name of Bank Negara Indonesia Unit III to Bank Negara Indonesia 1946.	1968
4.	**Perusahaan Perseroan (Persero) Bank Negara Indonesia**	Adjustments of the legal form by the Government of Indonesia through Government Regulation No. 19 of 1992 dated April 29, 1992 concerning the Adjustment of the Legal Form, Bank Negara Indonesia 1946 became a Limited Liability Company (Persero).	April 29, 1992
5.	**PT Bank Negara Indonesia (Persero) Tbk**	Adjustment to Law No. 40 of 2007 concerning Limited Liability Companies, BNI added "PT" as a limited liability company and "Tbk" as a public company.	June 13, 2008

Vision, Mission, and Corporate Culture [ACGS D.1.4]

VISION

To become a Financial Institution with Sustainable Service and Performance Excellence

Vision Explanation

1. **To become a Financial Institution**
   a. Technological developments in the digital era and changes in customer preferences have prompted banks to be able to develop their product and service propositions to meet the increasingly complex customer needs. This development is supported by the increasingly integrated and complementary financial service products, as well as the emerging of Fintech era in financial services.
   b. Increasingly complex customer needs for financial services, for banking transactions, sharia, investment, insurance, and alternative financing besides credit.
   c. The policy issued by the regulator (FSA) encourages integrated governance (corporate governance, compliance, auditing, and risk management) in conglomeration management for group companies that own banks and other financial services.

2. **Excels in Services**
   a. Services are key and are offered to customers of financial service providors.
   b. Excellent services and a positive customer experience will add value for customers when choosing a financial institution.
   c. Financial institution services are required to cover all customer segments so as to make financial institutions a lifetime financial partner and a total financial solutions provider, customized to customer needs, and includes serving the business ecosystem in an integrated manner.

3. **Excels in Performance**
   a. The Company's financial performance is an aspect that can increase the value for customers, investors, employees, communities and industry.
   b. Good company performance is a benchmark to seeing the company health level and excellence in the industry.
   c. Good company performance also increases the Company's sustainability (sustainable growth).
   d. Company performance is supported by the performance of the entire organization at all levels to be the best.

4. **Sustainability**
   a. Services provided to customers and company performance illustrates the company's success that must be maintained in supporting the company's existence in the financial industry.
   b. Excellent service and performance needs to be carried out to provide positive feedback to shareholders over an indefinite period of time.

MISSION

1. **Providing excellent services and digital solutions to all customers, and as the primary partner of choice.**
2. **Strengthening international services to support the needs from our global business partner.**
3. **Increasing the prime investment value for investors.**
4. **Creating the best conditions for employees as a place of pride for work and accomplishment.**
5. **Increasing awareness and responsibility to the environment and society.**
6. **Becoming a reference for the implementation of compliance and good corporate governance for industry.**

BNI's mission covers the 5 (five) key stakeholders that influence BNI's Vision achievement in providing superior service and performance. The 5 (five) key stakeholder groups are:



Mission Explanation

BNI's mission explanation is as follows:

1. **Providing excellent services and digital solutions to all customers, and as the primary partner of choice, as follows:**
   a. Providing complete, integrated, quality, reliable, and dependable products/banking services;
   b. Providing "one stop solution" services for both business and individual customers;
   c. Providing best-in-class products and services;
   d. Improving customer experience for processes considered critical by customers;
   e. Proactively making adjustments and improvements in accordance with development of customer needs and demands for quality products/services offered by BNI;
   f. Providing convenience for customers in conducting transactions through digital solution services.

2. **Strengthening international services to support the needs from our global business partners:**
   a. Providing quality products as the partner of choice for Indonesian companies to expand globally;
   b. Providing gateway services to help foreign companies penetrating Indonesian market;
   c. Providing financial institution products/services to Indonesians living abroad.

3. **Increasing the investment value for investors**
   a. Achievement of maximum operating profit (profitability);
   b. Growth that is sustainable and can be justified (sustainable growth);
   c. Healthy financial institutions;
   d. Cost control (cost effectiveness);
   e. Stable and increasing share prices;

4. **Creating the best conditions for employees as a place of pride for work and achievement**
   a. Providing equal and broad opportunities for increasing knowledge, skills, and certainty of career paths;
   b. Creating and supporting talent management programs to create future leaders for both BNI and Indonesia;
   c. Providing facilities and a work environment that is safe, comfortable, harmonious to support the achievement of the target of increasing productivity.

5. **Increasing awareness and responsibility to the environment and society**
   a. Actively serving banking needs for all levels of society;
   b. Actively seeking and entering new businesses that are in line with the latest rules and regulations;
   c. Actively developing international business for business expansion in prospective countries;
   d. Actively improving the quality of the environment and community in line with business development.

6. **Becoming a reference for the implementation of compliance and good corporate governance for industry**
   a. Implementation of integrated risk management;
   b. Accommodate whistle blowers to protect the interests of the Company and society;
   c. Active communication between Company Management and all employees and leaders who can become role models;
   d. Actively updating rules, regulations, and implementing them in a disciplined and systematic manner, to become a trusted financial institution.

BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS REVIEW OF THE VISION AND MISSION

BNI's Vision and Mission are formulated by considering all stakeholders, including the Board of Commissioners, Management, Subsidiaries, representatives of all levels of employees, the community, investors, customers, government, and relevant experts in the financial industry. This is done through various methods such as surveys, interviews, and joint discussions.

BNI's Vision and Mission were outlined in the Long Term Plan in accordance with the Board of Commissioners' approval No. DK/60 dated November 24, 2023 and the Bank Business Plan (RBB) 2024-2026 in accordance with the Board of Commissioners' approval No. DK/181 dated November 14, 2024.

Every year, the Vision and Mission are reviewed in line with the latest conditions of BNI as a reference for formulating business strategies in the future. The management ensures that the vision and mission are consistent with long-term goals, and the implementation of vision achievement is carried out by effectively utilizing innovation and technology.

VISION AND MISSION ACHIEVEMENT STRATEGY

The strategies have been outlined in long-term and short-term documents, and are used as a reference in running BNI's business, where these strategies and their realization are reported periodically to the regulator (FSA).



CORPORATE CULTURE

BNI determines and enforces "AKHLAK", as the key value, which consists of Trustworthy, Competent, Harmonious, Loyal, Adaptive, Collaborative, and must be followed by all BNI personnel when carrying out their daily duties.



COMPANY CULTURE SOCIALIZATION AND INTERNALIZATION

Application of AKHLAK

AKHLAK application at BNI is supported and accelerated by the transformation of work culture, aiming to align with BNI's values. The AKHLAK Core Values (Trustworthy, Competent, Harmonious, Loyal, Adaptive, Collaborative) were mandated by the Ministry of SOEs. The process of internalizing AKHLAK core values has been carried out for four years and will continue to be carried out through many activities and methods that are constantly being evaluated so that the application of these values can run optimally.

In 2024, BNI continued the internalization and socialization program of the implementation of AKHLAK by, e.g., running a Work Culture transformation program and internalizing cultural transformation through socialization to all Regional Offices and Head Office. Socialization was carried out to all RACE Captains and RACE Champions. In addition, in 2024 each Regional Office and Division at the Head Office carried out each work culture program prepared.

Lines of Business

BUSINESS ACTIVITIES BASED ON THE LATEST ARTICLES OF ASSOCIATION AND ALREADY IMPLEMENTED

In accordance with Article 3 of the Company's latest Articles of Association as stated in No. 05 dated March 04, 2024 made before Notary Ashoya Ratam S.H., M.Kn and has obtained approval for amendments to the articles of association from the Minister of Law and Human Rights through decision letter No. AHU-0020672. AH.01.02.of 2024 dated April 01, 2024 and letter of acceptance of notification of amendments to the articles of association No. AHU-AH.01.03-0079037 dated April 01, 2024, the purpose and objective of the Company is to conduct business in the banking sector as well as optimizing the utilization of the Company's resources to produce high quality services and strong competitiveness to obtain/pursue profits to increase the value of the Company by applying the principles of Limited Liability Companies. To carry out these purposes and objectives, the Company may carry out business activities, as follows:

	Business Activities Based on the Articles of Association	Business Activities Have been Implemented	Business Activities Not yet Implemented
1	Collecting funds from the public in the form of savings, current deposits, time deposits, savings deposits, or other equivalent forms.	✓	-
2	Distributing funds in the form of loans.	✓	-
3	Issuing and/or executing securities transactions for the benefit of the Company and/or customers.	✓	-
4	Transferring money either for its own benefit or the benefit of customers.	✓	-
5	Placing, lending or borrowing with other banks, by using mail, telecommunication facilities and notes, checks or other facilities.	✓	-
6	Receiving payments from securities billing and performing calculations with or among third parties.	✓	-
7	Facilitating a secure place for goods and securities.	✓	-
8	Carrying out custodial activities of goods and/or securities for the benefit of other parties based on a contract.	✓	-
9	Performing funds placements from a customer to other customers in the form of securities that are not listed on a stock exchange.	✓	-
10	Conducting financing and/or other activities including activities based on sharia principles, in accordance with the provisions stipulated by competent authorities.	✓	-
11	Performing activities in factoring, credit card business and trustee services.	✓	-
12	Conducting foreign currencies activities by fulfilling the conditions set by competent authorities.	✓	-
13	Performing equity activities in financial services institutions and/or other companies that support the banking industry, by fulfilling the applicable regulations.	✓	-
14	Performing temporary capital participation activities to overcome any consequence of loan failure, including financing failure based on sharia principles with condition that the participation must be withdrawn, in accordance with applicable regulations.	✓	-
15	Acting as the founder of the pension fund and the administrator of the pension fund in accordance with the provisions in the laws and regulations.	✓	-
16	Organizing payment system service activities.	✓	
17	Performing receivables transfer activities.	✓	
18	Performing other activities with OJK approval.	✓	

PRODUCT AND SERVICES PRODUCED

BNI is a Company engaged in the banking sector, BNI delivers deposit products, loan products, and other services. BNI's products and services are as follows:

CONSUMER RETAIL

BNI Taplus





Savings

- BNI Taplus
- BNI Taplus Muda
- BNI Taplus Bisnis
- BNI Tappa (Taplus Pegawai/Taplus Anggota)
- BNI Tapenas
- BNI Taplus Anak
- BNI Taplus Diaspora
- BNI Simpanan Pelajar
- BNI Pandai
- Tabunganku
- BNI Dollar (USD/SGD/AUD)
- BNI Deposito (IDR/USD/SGD/JPY/HKD/EUR/GBP/AUD)
- BNI Simponi (DPLK BNI)
- Tabungan Indonesia Pintar (PIP)
- Emerald Saving
- BNI Tabungan RDN (Rekening Dana Nasabah)

Loans

- BNI Griya
- BNI Griya Multiguna
- BNI Griya KPR Subsidi
- BNI Fleksi
- BNI Fleksi Pensiun
- BNI Instan
- BNI Oto

Credit Cards

- Regular Credit Card
  - » BNI Visa Gold
  - » BNI Mastercard Gold
  - » BNI JCB Gold
  - » BNI Amex Vibe
- Premium Credit Card
  - » BNI Mastercard Style Titanium
  - » BNI Visa Platinum
  - » BNI JCB Precious
  - » BNI JCB Ultimate
  - » BNI Mastercard World
  - » BNI Visa Signature
  - » BNI Visa Infinite
- Co-Branding Credit Card
  - » Garuda BNI
  - » BNI Pertamina
  - » BNI Telkomsel
  - » BNI Bank BJB
  - » BNI LOTTE Mart
  - » BNI Batik Air
  - » BNI Siloam Hospitals
  - » BNI XL Prioritas
  - » BNI MAP Club
- Affinity Credit Card
  - » Affinity Universitas Credit Card
  - » Affinity Ikatan Alumni Credit Card
  - » Affinity Komunitas/Organisasi Credit Card
  - » Affinity Pegawai Perusahaan Credit Card
- Corporate Credit Card
  - » BNI Visa Corporate Card Gold
  - » BNI Visa Corporate Card Platinum
  - » BNI Mastercard Corporate Card
  - » BNI Government Credit Card
- Private Label Credit Card
  - » BNI Travelling Card
  - » BNI Health Card
  - » BNI Distribution Card
  - » BNI Gasoline Card
- BNI Cash Card

Debit Card

- Regular Debit Card
  - » Silver Debit Card
  - » Gold Debit Card
  - » Taplus Muda Debit Card
  - » Taplus Anak Debit Card
  - » GPN Debit Card
- Premium Debit Card
  - » Platinum Debit Card
  - » Emerald Debit Card
  - » Private Debit Card
- Co-Brand Debit Card
  - » Garuda Debit Card
  - » Citilink Debit Card
  - » Batik Air Debit Card
  - » Lotte Grosir Debit Card
  - » Indogrosir Debit Card
- Affinity Debit Card
  - » Kerjasama Universitas Debit Card
  - » Kerjasama Anggota Debit Card (Alumni/Organisasi/Komunitas)
  - » Kerjasama Pegawai Perusahaan Debit Card
- BNI Emerald Debit Card
  - » Kartu Keluarga Sejahtera
  - » Kartu Indonesia Pintar
  - » Kartu Tani

Emerald Service

- BNI Emerald Service

Investment Products

- Money Market Mutual Funds (IDR and USD)
- Fixed Income Mutual Funds (IDR and USD)

- Mixed Mutual Funds (IDR and USD)
- Shares Mutual Funds (IDR and USD)
- Protected Mutual Funds
- Government Retail Bonds (ORI, SR, SBR, ST)
- Government Securities via secondary market mechanisms and Ministry of Finance Auctions in IDR (FR, PBS) and USD (Indon, Indois)
- Corporate Bonds (IDR and USD)
- Depo Swap (JPY, USD and SGD)
- Market Linked Dual Currency Investment
- Referral Brokerage Saham
- Foreign Exchange

Insurance Products

- In-Branch
  - » BNI Life MProtection
  - » Blife Maksima Sehat
  - » BNI Life MProtection Plus
  - » Blife Perisai Prima
  - » BNI Life Plan Multi Protection
  - » Blife Term Pro
  - » Solusi Abadi Plus
  - » Solusi Pintar
  - » BLife Hy End Pro
  - » Swadana
  - » Blife Fixed Protection
  - » BNI Life Infinite Protection
  - » BNI Life Steady Protection
  - » BNI Life Ultima Protection
  - » Pension Fund Protection Solution
  - » Health Fund Solution
- Syariah Inbranch
  - » BNI Life Hy End Pro Syariah
  - » BNI Life Sakinah Multipro Link
  - » BNI Life Wadiah Gold Cendekia
- Employee Benefit
  - » Optima Group Health
  - » Optima Group Life
  - » Optima Group Protection
  - » Optima Group Saving
  - » Optima Manage Care
- Syariah Employee Benefit
  - » BLife Ekawarsa Syariah
  - » BLife Syariah Dana Hari Tua
  - » BNI Life Syariah Mitra Cendekia
  - » BLife Health Plan Syariah
  - » BLife Asuransi Kecelakaan Diri Plus Syariah
- Telesaving
  - » Proteksi Prima
  - » BNI Life Active
  - » BNI Life Definite Protection
  - » BNI Life Smart Protection Plus
  - » Safe Medical Plan +
  - » PA Protection Plus
  - » Digital (Mobile Banking)
  - » BNI Life Digi Micro Protection
- Consumptive Loan
  - » BNI Life AJK Collateral
  - » BNI Life AJK Non Collateral
- Productive Loan
  - » Asuransi Jiwa Kredit Kumpulan
  - » Asuransi Jiwa Kredit BNI Life Proteksi Kredit Produktif +
- Telecredit card
  - » PA Protection Plus
  - » Solusi Proteksi Sehat
  - » Safe Medical Plan +
  - » Perisai Plus
  - » Bundling
  - » Blife Tapenas

Digital Banking

- wondr by BNI
- BNI Mobile Banking
- BNI SMS Banking
- BNI Internet Banking
- BNI Phone Banking
- BNI DigiCs
- BNI TapCash
- BNI Agen46
- BNI QRIS
- BNI Debit Online
- BNI EDC
- BNI EDC Mini ATM
- BNI iPay
- BNI SmartPay
- BNI API Digital Services
- BNI Pembukaan Rekening Digital (DOA)
- BNI E-Form Program Kartu Pra Kerja
- BNI Direct Debit
- BNI ATM/CRM
- BNI ATM Drive Thru

Services

- Domestic Money Transfers
- International Money Transfers
- Safe Deposit Box
- Inkaso
- BNI Surat Keterangan Bank
- Traveller's Cheque
- Foreign Bank Notes

BUSINESS BANKING

Savings

- BNI Individual Current Account
- BNI Non-Individual Current Account
- BNI Giro Joint Account
- BNI Giro Persero Perorangan
- Deposito Berjangka Perusahaan
- BNI Giro Multi Currency

Digital Banking

- BNIdirect
  - BNIdirect Cash
  - BNIdirect Supply Chain
  - BNIdirect Trade
  - BNIdirect Receivables
- BNIdirect Mobile
- API Corporate Banking

Lending Products

- Working Capital Loans (KMK)
- Investment Loans (KI)
- Kredit Term Loan
- Bank Guarantee (GB)
- Stand-by LC (SBLC)
- Domestic Documentary Letter of Credit (SKBDN)
- Plafond Letter of Credit (LC) Impor
- Export Loans
- Import Loans
- Syndicated Loans
- Counter Guarantee Loans
- Transactional Loans
- Treasury Line
- Money Market Line
- Government or Government Institutions Loans
- Cash Collateral Credit (CCC)
- Bonds Collateral Credit
- Supply Chain Financing
- Financial Institutions Lingkage Loans (KKLK)
- People's Business Loans (KUR)
- BNI Wirausaha (BWU)

Services

- Wholesale Solutions
  - » **Cash Management**
    - * Collection Management
      - Virtual Account
      - BNI e-collection
      - Auto Debit
      - Cash Pick-Up
      - Student Payment Center
      - Autopay
    - * Liquidity Management
      - Cash Pooling
      - Cash Distribution
      - Range Balance Account
      - Depo Swap
      - Notional Pooling
    - * Payment Management
      - E-Tax
      - E-PBB

- E-Tax Kepabeanan – PNBP
- Billing Payments
- Utility Payments
- Payroll
- BNI POPS (Pertamina Ordering and Payment Solutions)
- Integrated Payment Management (ERP)
- E-mail/Beneficiary Advice
- Smart Commerce Pay
- Transfer Management
- Information Management

* ECOSmart
* Edupatrol
* Remittance
* Intraday Services

» **Trade Products**
* Trade Services
  - Import LC Issuance
    - Sight LC
    - Usance LC
    - Back to Back LC (BBLC)
    - Transferable Letter of Credit
  - Export LC:
    - LC Export Advising
    - LC Export Collection
  - Inward Documentary Collection
  - Outward Documentary Collection
  - Shipping Guarantee
  - Standby Letters of Credit
  - BNI Trade Online
  - Demand Guarantee
  - Bank Guarantee Undercounter
  - Domestic Bank Guarantee
  - Confirm LC/SKBDN
* Trade Finance
  - Export & Import LC Negotiation
  - Trust Receipt
  - Bill Collection Financing
  - Open Account Financing
  - Bills Discounting
  - LC Refinancing
  - Forfaiting
  - Trade Advance Financing

» **Syndication**
* Structured Finance
* Arrangement
* Facility Agent
* Security Agent
* Escrow Agent
* Paying Agent

» **Fund Services**
* Fund Accounting, Fund Administration, Reporting and Publication Supervision
* Core Banking BNI
* Transfer Agency
* Performance Bond/ Guarantee from Implementing Bank
* Maintenance Bond/ Retention Bond/Guarantee from Maintaining Bank
* Payment Bond/Guarantee from Payment Bank
* Custom Bond

TREASURY & INTERNATIONAL

Loan Products
- Corporate Loan (Working Capital Loan, Investment Loan, and Term Loan)
- Diaspora Loan
- Overdraft Facility
- Trade Financing
- Syndicated Loans
- Project Financing
- Discount Bills
- Loan on Bills
- Two Steps and Channeling Loan to Local Companies from Indonesia

Retail Services Products
- BNI Current Account (SGD, HKD, CNY, JPY, KRW, and USD)
- BNI Fixed Deposit (SGD, HKD, CNY, JPY, KRW, and USD)
- BNI Saving Account (SGD, HKD, CNY, JPY, KRW, and USD)
- Demand Deposits
- Negotiable Deposits
- Remittance
- Hospital Guarantee
- BNI Singapore Payment System (MEPS)
- BNI Hong Kong Payment System (HKD Chats)
- BNI New York Payment System (USD Fedwire)
- BNI Tokyo Payment System (Local Currency Settlement/LCS)
- Escrow Agent
- Safe Deposit Box
- Bare Trust

Financial Institution Products
- Forfaiting & Risk Participation
- Trade Based Refinancing
- Trade Advanced Financing
- Bilateral & Syndicated Term Loan
- Global Payment & Nostro Account

Custody Product
- Custodian Services
- Trustee
- Trust

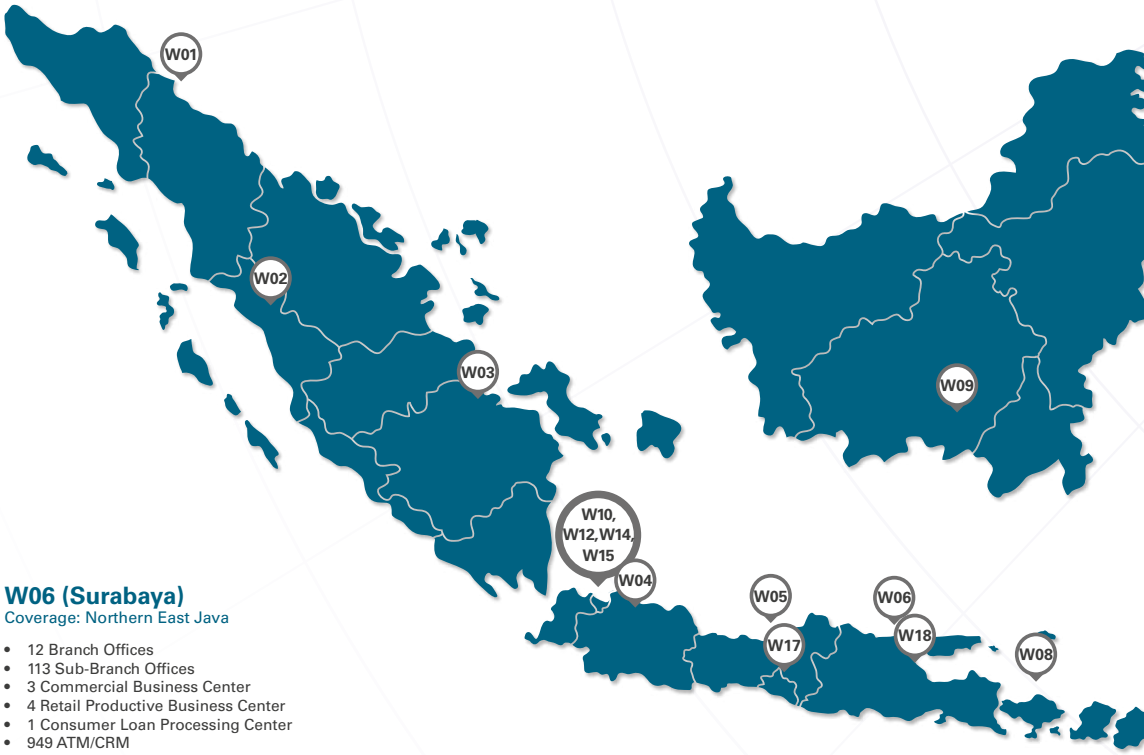
Non-Bank Financial Institution Product
- Loan Facility to Non Bank Financial Institution
- Commercial Line to Non Bank Financial Institution
- Intraday to Non Bank Financial Institution

Treasury
- Foreign Exchange
  - » Today
  - » Tom
  - » Spot
  - » Bank Notes
- Investments
  - » Deposit on Call (DOC)
  - » Money Market Account (MMA)
  - » Obligasi Retail
  - » Depo Swap
  - » Market Linked-Dual Currency Investment (MLDCI)
- Hedging
  - » Currency Forward
    - * Domestic Non-Deliverable Forward (DNDF)
    - * PAR Forward
  - » Currency Swap
  - » Currency Option
  - » Interest Rate Swap (IRS)
    - * Overnight Index Swap (OIS)
  - » Cross Currency Swap (CCS)
  - » Call Spread Option (CSO)
    - * Series of Call Spread
- Reverse Repo

Company Operational Areas

Until the 2024 financial year, BNI had 1 (one) head office, 17 regional offices, 10 (ten) overseas office networks and 1,838 office networks consisting of branch offices, sub-branch offices and business centers. Of the 10 (ten) overseas office networks, there are 6 (six) overseas branch offices, 1 (one) sub-branch, 1 (one) remittance branch office, and 2 (two) representative office spread across 8 (eight) countries.

The entire BNI office network stays keenly focused on how to deliver services and business solutions as well as convenient customer transactions here in the country and overseas. In encouraging the development of customer businesses in Corporate & International Banking, Institutional Banking, Enterprises & Commercial Banking, Consumer Banking, Treasury, Head Office, and Subsidiary Entities segments, the BNI office network is supported by competent and dedicated human resources. To allow easier, faster, and closer access to its services, BNI now has 213,370 BNI Agen46 as a branchless banking network specifically established to support financial literacy and inclusion in the community. Presented below is detailed information about BNI's operational areas covering the Office and BNI Agen46 networks by region:



W01 (Medan)
Coverage: North Sumatra

- 13 Branch Offices
- 79 Sub-Branch Offices
- 1 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 688 ATM/CRM
- 11,418 BNI Agen46

W02 (Padang)
Coverage: West Sumatera, Riau, and Riau Island

- 13 Branch Offices
- 99 Sub-Branch Offices
- 2 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 859 ATM/CRM
- 13,017 BNI Agen46

W03 (Palembang)
Coverage: South Sumatra, Jambi, Bengkulu, Bangka Belitung, and Lampung

- 15 Branch Offices
- 102 Sub-Branch Offices
- 1 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 838 ATM/CRM
- 17,956 BNI Agen46

W04 (Bandung)
Coverage: West Java

- 15 Branch Offices
- 110 Sub-Branch Offices
- 1 Commercial Business Center
- 2 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 1,060 ATM/CRM
- 19,491 BNI Agen46

W05 (Semarang)
Coverage: Northern Central Java

- 11 Branch Offices
- 76 Sub-Branch Offices
- 1 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 668 ATM/CRM
- 16,065 BNI Agen46

W06 (Surabaya)
Coverage: Northern East Java

- 12 Branch Offices
- 113 Sub-Branch Offices
- 3 Commercial Business Center
- 4 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 949 ATM/CRM
- 15,603 BNI Agen46

W07 (Makassar)
Coverage: Sulawesi, Southeast Sulawesi, South Sulawesi and Maluku

- 11 Branch Offices
- 99 Sub-Branch Offices
- 1 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 823 ATM/CRM
- 8,737 BNI Agen46

W08 (Denpasar)
Coverage: Bali, West Nusa Tenggara, and East Nusa Tenggara

- 9 Branch Offices
- 97 Sub-Branch Offices
- 1 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 779 ATM/CRM
- 12,006 BNI Agen46

W09 (Banjarmasin)
Coverage: West Kalimantan, Central Kalimantan, South Kalimantan, East Kalimantan, and North Kalimantan

- 21 Branch Offices
- 126 Sub-Branch Offices
- 2 Commercial Business Center
- 1 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 1,075 ATM/CRM
- 14,527 BNI Agen46

W10 (Jakarta Senayan)
Coverage: West Jakarta, Central Jakarta, East Jakarta, and South Jakarta

- 7 Branch Offices
- 115 Sub-Branch Offices
- 2 Commercial Business Center
- 2 Retail Productive Business Center
- 494 ATM/CRM
- 5.127 BNI Agen46

W11 (Manado)
Coverage: North Sulawesi, Central Sulawesi, Gorontalo, and North Maluku

- 11 Branch Offices
- 56 Sub-Branch Offices
- 1 Consumer Loan Processing Center
- 456 ATM/CRM
- 9,509 BNI Agen46

W12 (Jakarta Kota)
Coverage: North Jakarta, Central Jakarta, and West Jakarta

- 7 Branch Offices
- 89 Sub-Branch Offices
- 1 Commercial Business Center
- 4 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 474 ATM/CRM
- 6,885 BNI Agen46

Overseas Office Networks



6 Overseas Offices
- New York, United State of America
- London, England
- Seoul, South Korea
- Tokyo, Japan
- Hong Kong
- Singapore

1 Overseas Sub-Branch Office
- Osaka, Japan

1 Remittance Office
- Singapore

2 Representative Office
- 1 Amsterdam, Netherlands
- 1 Sydney, Australia

9 ATM
- 8 Hong Kong
- 1 Singapore



W14 (Jakarta BSD)
Coverage: South Jakarta, Depok, Bogor, and Banten

- 10 Branch Offices
- 109 Sub-Branch Offices
- 1 Commercial Business Center
- 2 Retail Productive Business Center
- 1,285 ATM/CRM
- 12,347 BNI Agen46

W16 (Papua)
Coverage: Papua, West Papua, Central Papua, South Papua, Southwest Papua, and Highland Papua

- 5 Branch Offices
- 37 Sub-Branch Offices
- 171 ATM/CRM
- 5,950 BNI Agen46

W18 (Malang)
Coverage: Southern East Java

- 14 Branch Offices
- 69 Sub-Branch Offices
- 861 ATM/CRM
- 20,497 BNI Agen46

W15 (Jakarta Kemayoran)
Coverage: East Jakarta, Bekasi, Jababeka and Karawang

- 8 Branch Offices
- 110 Sub-Branch Offices
- 2 Commercial Business Center
- 3 Retail Productive Business Center
- 992 ATM/CRM
- 7,819 BNI Agen46

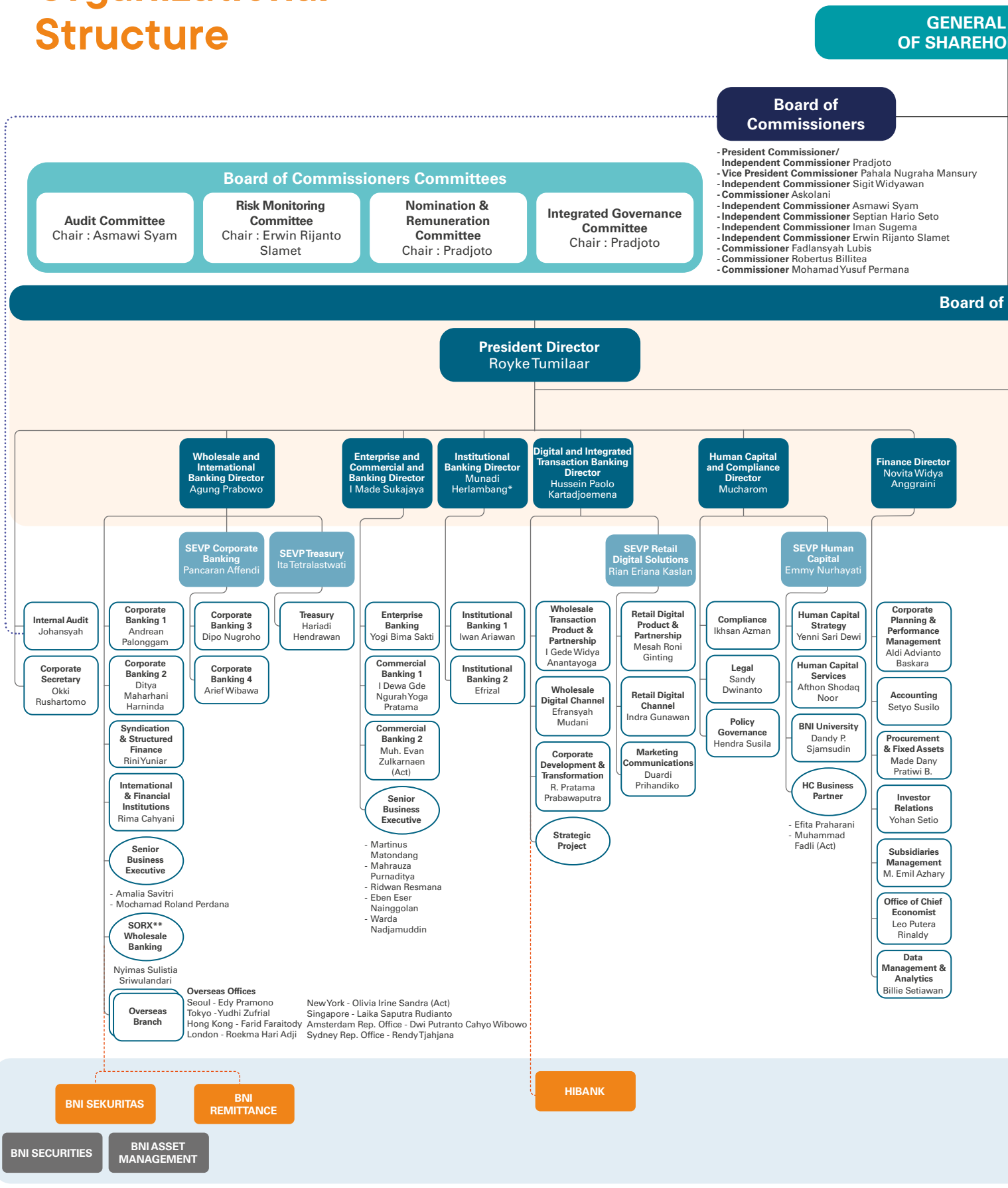
W17 (Yogyakarta)
Coverage: Yogyakarta and Southern Central Java

- 15 Branch Offices
- 97 Sub-Branch Offices
- 1 Commercial Business Center
- 2 Retail Productive Business Center
- 1 Consumer Loan Processing Center
- 906 ATM/CRM
- 16,416 BNI Agen46

BNI Network

1	Head Office
17	Regional Offices
197	Branch Offices
1,583	Sub-Branch Offices
20	Commercial Business Center
26	Retail Productive Business Center
12	Consumer Loan Processing Center
330	BNI DigiCS
13,388	ATM/CRM
213,370	BNI Agen46

Organizational Structure



NOTE:

- Supervision line
- Coordination line
- Lines of communication & information delivery
- Board of Commissioners
- Committee

* Has not been effective
** SORX: Senior Operational Risk Executive

MEETING
LDERS (GMS)

Board of Directors Committees

Credit Committee	Credit Policy Committee	Business Committee	Asset & Liability Committe	Integrated Risk Management Committee
Human Capital Committee	Performance Management Committee	Risk Management and Anti Fraud Committee	Technology Management Committee	Subsidiaries' Committee

Directors

Deputy President Director
Putrama Wahju Setyawan

Retail Banking Director
Corina Leyla Karnalies

- **SEVP Wealth Management** — Steven Suryana
  - **Wealth Management** — Henny Woe
- **Consumer Segment** — Sri Indira
- **Consumer Product** — Febrian Sugiharta
- **Card Business** — Grace Situmeang
- **Retail Productive Banking** — I Nyoman Astiawan
- **Business Program** — Sunarna Eka Nugraha
- **SORX** Consumer Banking & Corporate Function** — Putu Bagus Kresna

Risk Management Director
David Pirzada

- **SEVP Credit Risk** — Bun Hendra
  - **Corporate & Enterprise Credit Risk** — Aryani Dwi Satiti
  - **Commercial Credit Risk** — Yessy Kurnia Dyah W.
- **SEVP Remedial & Recovery**
  - **Corporate Remedial & Recovery** — Ujuan Marihot H. P.
  - **Enterprise & Commercial Remedial & Recovery** — Saridatun
  - **Retail Collection & Recovery** — Hari Satriyono
- **Enterprise Risk Management** — Rayendra Minarsa Goenawan
- **Operational Risk Management** — Adi Surya Djoko
- **Retail Credit Risk** — Made Nariswari
- **Anti Fraud** — Wilhelmus Max Charles
- **Senior Credit Risk Executive**
  - Yanar Siswanto
  - Muhammad Jufri
  - Julius D. Aritonang
  - Agus Sutanto
  - Eko Setiawan
  - Bernardus
  - Retna Mumpuni
  - Wirawan Ari Rachmana
  - Badriansyah
  - Renosari

Technology and Operations Director
Toto Prasetio

- **SEVP Information Technology** — Victor Korompis
  - **IT Strategy & Architecture** — Ari Pratiwi
  - **CISO** — Sonny Setiadi (Act)
  - **Operations Strategy & Development** — Herry Setiadi Munawir (Act)
  - **SORX** Technology Digital & Operations** — Munajat
  - **Wholesale Digital Delivery** — Alfonso Tambunan
  - **Retail Digital Delivery** — Heri Atmoko
  - **Application Development** — Setiawan Anis Widjojo
  - **IT Application Services** — Nugroho Gito Prasodjo (Act)
  - **IT Infrastructure Management** — Sonny Setiadi
- **SEVP Operations** — Anang Basuki
  - **Banking Operations** — Herry Setiadi Munawir
  - **Digital Operations** — Muhammad Gunawan Putra
  - **Credit Operations** — Erisman (Act)

Network and Services Director
Ronny Venir

- **Distribution Network & Sales** — Beby Lolita Indriani
- **Agen46** — Rahma Dhoni
- **Customer Experience Center** — Rahmat Pertinda
- **SORX** Network & Services** — Suryo Utomo
- **Regional Office**

Regional Offices
01 - Rustianto
02 - Khairul Salam
03 - ZamZami
04 - Roy Wahyu Maulana
05 - I Gst. Nym. Dharma Putra
06 - Maya Agustina
07 - Muhammad Arafat
08 - Komang Arya Wira Kusuma Atmaja
09 - Andy Yusdiman
10 - Anak Agung Agustiya Novitayanti
11 - Lodewyck Z.S. Pattihahuan
12 - Rudy Sihombing
14 - Faizal Arief Setiawan
15 - Koko Prawira Butar Butar
16 - Soesetyo Priharjanto
17 - Ariyanto Soewondo Geni
18 - Muhamad Jauhary

- **Pension Fund** — Ikhwani Fauzana

Subsidiaries
- **BNI FINANCE**
- **BNI VENTURES**
- **BNI LIFE**

Director
SEVP
Division
Functional Unit
Subsidiaries
Subsidiaries of BNI Sekuritas

Association Membership List

As of December 31, 2024, BNI's membership in associations or organizations related to the implementation of sustainable finance is shown in the table below.

Association/Organization Name	Membership Role
International	
Information Systems Audit and Control Association (ISACA)	Director of Marcomm
Asosiasi Pengusaha Indonesia – Jepang (APIJ)	Vice Chairman
European Association for Secure Transactions (E.A.S.T)	Associate Member
Association Swift International Banking Operation	Member
Association of Certified Fraud Examiner (ACFE)	Member
Asia Pacific Loan Market Association (APLMA)	Member
Contact Center World (CCW)	Member
European Foundation for Management Development (EFMD)	Member
Financial Services – Information Sharing and Analysis Center (FS-ISAC)	Member
International Information System Security Certification Consortium (ISC2)	Member
International Swaps and Derivatives Association (ISDA)	Member
International Banking Asociation Jepang (IBA)	Member
Institute of International Bankers (IIB)	Member
Japan Indonesia Asociation (JAPINDA)	Member
Open Compliance and Ethics Group (OCEG)	Member
Society for Worldwide Interbank Financial Telecommunications (SWIFT)	Member
The Institute of Internal Auditors - Indonesia (IIA)	Member
National	
Indonesian Money and Foreign Exchange Market Association	Founder
Communication Forum -Training Institutions (LPK) on Payment Systems and Management of Rupiah Currency (SPPUR)	Forum Chairman
Communication Forum of Banking Compliance Directors (FKDP)	Vice Chairman Training Affairs
Task Force Cyber Security BUMN	Head of Team - Sub-team of Cyber Security Guideline Affairs
Forum Human Capital Indonesia (FHCI)	• Head of Field I • Member
Asosiasi Corporate University (Wivata Kinarva Nusantara)	Vice Chairman
Business Development Team for Coffee and Cocoa Commodities at the Ministry of State-Owned Enterprises	• Deputy Coordinator II • Member
Jakarta Clearing Communication Forum	Secretary
Asosiasi Bank Kustodian Indonesia (ABKI)	Expert Team
Indonesian Bankers Club	• Advisor • Member
Forum Komunikasi Direktur Operasional (FKDOP)	Head of Secretariat and Organization
Ikatan Auditor Intern Bank (IAIB)	• Head of Research & Development • Research & Development Division • Certification & Ethics Manager
Association Cambiste International (ACI) FMA Indonesia	Manager
Association Bank Appointed Cross Currency Dealers (ACCD)	Manager
Asosiasi Wali Amanat Indonesia (AWAI)	Manager

Association/Organization Name	Membership Role
Indonesia Foreign Exchange Market Committee (IFEMC)	Manager
Perhimpunan Pedagang Surat Utang Negara (HIMDASUN)	Manager
Asosiasi SWIFT Indonesia (ASWIFTINDO)	Audit Committee
Asosiasi Sistem Pembayaran Indonesia (ASPI)	Member
Asosiasi Bank Kustodi Indonesia (ABKI)	Member
Asosiasi Service Quality Indonesia (ASQI)	Member
Asosiasi Fintech Indonesia	Member
Asosiasi SWIFT Indonesia (ASWIFTINDO)	Member
Asosiasi Fintech Pendanaan Bersama Indonesia (AFPI)	Member
Asosiasi Dana Pensiun Indonesia (ADPI)	Member
Asosiasi Perdagangan Berjangka Komoditi Indonesia (ASPEBTINDO)	Member
Association of Banks in Singapore (ABS)	Member
Asosiasi Kartu Kredit Indonesia	Member
Computer Security Incident Respon Team (CSIRT) BSSN	Member
Central Counterparty Transaksi Derivatif Suku Bunga dan Nilai Tukar Over the Counter (CCP SBNT)	Member
Credit Bureau Singapore	Member
Certified Practising Accountant - CPA Australia	Member
Chartered Accountants - CA ANZ	Member
Financial Industry Dispute Resolution Centre (FIDReC)	Member
Forum Komunikasi Operasional Kas Perbankan (FKOKP)	Member
Forum CISO Himpunan Bank Negara	Member
Forum Hukum BUMN	Member
Foreign Bank Group	Member
Foreign Bankers Association	Member
Himpunan Bank Milik Negara (HIMBARA)	Member
Indonesia Contact Center Association (ICCA)	Member
Ikatan Akuntan Indonesia (IAI)	Member
Korean Federation of Bank	Member
Kelompok Kerja Akselerasi Pemberdayaan Usaha Mikro, Kecil, dan Menengah Sektor Kelautan dan Perikanan (Pokja Akselerasi UMKM) Kementerian Kelautan dan Perikanan	Member
Lembaga Alternatif Penyelesaian Sengketa Sektor Jasa Keuangan	Member
Overseas Bankers Association of Australia	Member
Perhimpunan Bank Nasional (PERBANAS)	Member
Pusat Penanganan Penipuan Transaksi Keuangan (PUSAKA)	Member
PMO Kopi Nusantara Kementerian BUMN	Member
Primary Dealer Pasar Uang dan Pasar Valuta Asing	Member
Perkumpulan Dana Pensiun Lembaga Keuangan	Member
Rapi Utama Indonesia (RAPINDO)	Member
Securities Investor Protection Fund (SIPF)	Member
Sistem Penyelenggara Pasar Alternatif (SPPA) BEI	Member
Singapore Deposit Insurance Corporation (SDIC)	Member
Tim Kerja PMO Pertashop Kementerian BUMN	Member
Bankers Association for Risk Management (BARa)	• Deputy Director of Credit Risk & ESG • Team Member for Enterprise Risk Management • Team Member for Competency Standardization of Assessors
Forum Manajemen Risiko (FMR) – Kementerian BUMN	Event & Talent Development Team Member
Komite Kliring Central Counterparty (CCP) dan Penanganan Risiko	Member

Board of Commissioners' Profiles [ACGS C.2.5, D.4.1, D.4.2]



PRADJOTO
President Commissioner/Independent Commissioner

Age
71 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Law from Universitas Indonesia (1981)
- Master of Economics from University of Kyoto, Japan (1988)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Vice President Commissioner/ Independent Commissioner of BNI through the decision of the Annual GMS dated March 17, 2015, as notarized through the Deed of the Annual General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk dated March 17, 2015 and obtained approval from the Financial Services Authority (FSA) on May 22, 2015. His position ended through the decision of the 2017 Annual GMS.

Reappointed as Vice President Commissioner/Independent Commissioner of BNI through the decision of the Annual GMS dated February 20, 2020, as notarized by the Deed of the Annual General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 21 dated February 20, 2020, and obtained approval from the Financial Services Authority (FSA) on June 17, 2020.

Then appointed as President Commissioner/Independent Commissioner of BNI through the decision of the Extraordinary GMS on September 19, 2023, as notarized by Deed of Extraordinary General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 17 dated September 19, 2023, and obtained approval the Financial Services Authority (OJK) dated February 19, 2024 as President Commissioner/ Independent Commissioner.

Term of Office
Following previous term of office as Vice President Commissioner/Independent Commissioner of BNI, namely 2020-2025 (First Period).

Concurrent Positions
BNI:
- Chairman of the Nomination and Remuneration Committee
- Chairman of the Integrated Governance Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
- Founder/Leader, Pradjoto & Associates - Advocates and Legal Consultant (1994-present)
- Member of Himpunan Konsultan Hukum Pasar Modal (HKHPM) (2000-present)
- Member of the Indonesian Advocates Association (Peradi) (2005-present)
- Board of Ethics for Risk Management Certification Agency (BSMR) (2005-present)
- Chairman of the Banking Business Ethics Supervisory Board, Association of National Banks (PERBANAS) (2009-present)
- Member of the Supervisory Board of the Indonesian Bankers Association (IBI) (2011-present)

Work Experience

- Professional Staff of PT Bank Pembangunan Indonesia (Bapindo) (1981-1995)
- Research Associate Institute of Economic Research Kyoto University (1993-1994)
- Founder/Leader, Pradjoto & Associates - Advocates and Legal Consultant (1994-present)
- Lecturer in Management, Postgraduate Program Management, Universitas Atmajaya Yogyakarta (1999-2001)
- Member of the National Ombudsman Commission (2000)
- Member of Himpunan Konsultan Hukum Pasar Modal (HKHPM) (2000-present)
- Member of the Joint Corruption Crime Team (TGTPK) (2000-2001)
- Chairman of IBRA Ombudsman (2001-2002)
- Independent Commissioner of Bank Internasional Indonesia (2002-2006)
- Member of the Indonesian Advocates Association (Peradi) (2005-present)
- Board of Ethics for Risk Management Certification Agency (BSMR) (2005-present)
- Independent Commissioner of PT Bank Mandiri (Persero) Tbk (2005-2015)
- Chairman of the Code of Ethics Board of the National Banks Association (Perbanas) (2006-2009)
- Advisory Board of the Indonesian Bankers Association (IBI) (2007-2011)
- Senior Advisor to Bank International Indonesia (2009-2011)
- Independent Commissioner of PT Mahaka Media Tbk (2009-2015)
- Chairman of the Supervisory Board of Banking Business Ethics, Association of National Banks (Perbanas) (2009-present)
- Member of the Supervisory Agency for the Indonesian Bankers Association (IBI) (2011-present)
- Vice President Commissioner/Independent Commissioner of PT Bank Negara Indonesia (Persero), Tbk (2015-2017)
- President Commissioner of PT Panah Perak Megasarana (2018-2019)
- Vice President Commissioner/Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2020-2023)
- President Commissioner/Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2023-present)

Affiliated Relationships

Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Statement of Independence

The Independence Statement of Independent Commissioner is disclosed in the Corporate Governance Chapter of this Annual Report.

Education and Training in 2024

Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024

Does not own BBNI shares



PAHALA NUGRAHA MANSURY

Vice President Commissioner

Age
53 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Economics degree from Universitas Indonesia (1994)
- Master of Business Administration at the Leonard N. Stern School of Business, America (1999)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)
- Certified in Risk Governance Professional (CRGP) by the Risk Management Professional Certification Institute (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Vice President Commissioner of BNI through the decision of the Extraordinary GMS dated September 19, 2023, as notarized through the Deed of the Extraordinary General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 17 dated September 19, 2023, and obtained approval from the Financial Services Authority (OJK) dated February 19, 2024.

Term of Office
2023-2028 (First Period)

Concurrent Positions
BNI:
- Member of the Risk Monitoring Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, member of the committee, or other positions.

Work Experience
- Senior Vice President Economic & Financial Research Group Head of PT Bank Mandiri (Persero) Tbk (2003-2005)
- Senior Vice President Corporate Development Group Head of PT Bank Mandiri (Persero) Tbk (2005-2006)
- Senior Vice President Accounting Group Head and concurrently Senior Vice President Change Management Office of PT Bank Mandiri (Persero) Tbk (2005)
- Executive Vice President Finance & Strategy Coordinator of PT Bank Mandiri (Persero) Tbk (2006-2010)
- Finance & Strategy Director of PT Bank Mandiri (Persero) Tbk (2010-2015)
- Treasury & Market Director of PT Bank Mandiri (Persero) Tbk (2015-2017)
- President Director of PT Garuda Indonesia (Persero) Tbk (2017-2018)
- President Commissioner of PT Citilink Indonesia (2017-2018)
- Finance Director of PT Pertamina (Persero) (2018-2019)
- President Director of PT Bank Tabungan Negara (Persero) (2019-2020)
- Deputy Minister of SOEs, Ministry of SOEs (2020-2023)
- Vice President Commissioner of PT Pertamina (Persero) (2021-2023)
- Deputy Minister of Foreign Affairs, Ministry of Foreign Affairs (2023-present)
- Vice President Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2023-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
677,291 shares



SIGIT WIDYAWAN
Independent Commissioner

Age
59 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Solo, Indonesia

Education and/or Certification
- Bachelor's degree in Economics from Universitas Negeri Sebelas Maret (1988)
- Master's degree in Accounting from Universitas Indonesia (2001)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)
- Certified in Indonesia Internal Audit Practitioner by the Institute of Internal Auditors Indonesia (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Independent Commissioner of BNI at the Annual General Meeting of Shareholders (AGMS) on March 20, 2018, based on Deed of the AGMS No. 37 dated March 20, 2018, and obtained approval from the Financial Services Authority (OJK) on September 7, 2018.

Reappointed as Independent Commissioner of BNI based on the decision of the Annual GMS dated March 15, 2023, which was notarized through the Deed of the AGMS No. 15 dated March 15, 2023.

Term of Office
- 2018-2023 (First Period)
- 2023-2028 (Second Period)

Concurrent Positions
BNI:
- Member of the Audit Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, member of the committee, or other positions.

Work Experience
- Head of Taxes, Concrete Products Division, PT Wijaya Karya (Persero) (1994-1997)
- Head of Finance, PT Wijaya Karya Beton (1997-2001)
- Director of Finance, Roda Jati Grup (2002-2013)
- Director, PT Roda Pembangunan Jaya (2003-2015)
- Independent Commissioner, PT Jasamarga (Persero) Tbk (2015-2018)
- Independent Commissioner, PT Bank Negara Indonesia (Persero), Tbk (2018-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Statement of Independence
The Independence Statement of Independent Commissioner is disclosed in the Corporate Governance Chapter of this Annual Report.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares



ASKOLANI
Commissioner

Age
58 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Economics from Universitas Sriwijaya Palembang (1990)
- Magister of Art in Economics and Banking from University of Colorado, Denver, USA (1999)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)
- Certified in Governance Oversight Professional (CGOP) by the Mitra Kalyana Sejahtera certification Institute (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Commissioner at the EGMS on August 30, 2019, based on the EGMS Deed of Minutes No. 55 dated August 30, 2019 and obtained approval from the Financial Services Authority (FSA) on December 20, 2019.

Reappointed as Commissioner of BNI based on the decision of the Annual GMS dated March 4, 2024, which was notarized through the Deed of the Annual GMS of PT Bank Negara Indonesia (Persero) Tbk No. 03 dated March 4, 2024.

Term of Office
- 2019-2024 (First Period)
- 2024-2029 (Second Period)

Concurrent Positions
BNI:
- Member of the Nomination and Remuneration Committee
- Member of the Integrated Governance Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Director General of Customs and Excise Directorate, General Customs and Excise, Ministry of Finance (2021-present).

Work Experience
- Routine Expenditure Analysis Division Head at State Expenditure Analyst Center, Fiscal Analysis Agency, Ministry of Finance (2003)
- Master's Program and Public Policy Planning, Post Graduate Lecturer, Faculty of Economics, Universitas Indonesia (2003-2007)
- Head of Sub-directorate at Central Government Expenditure Budgeting, Directorate of State Budget Preparation, Directorate General of Budget and Fiscal Balance, Ministry of Finance (2004)
- Formulation of State Expenditure Policy Recommendations Division Head, Center for State Expenditure Policy, at Fiscal Policy Agency, Ministry of Finance (2006).
- Head of PNBP Policy, Central Budget Policy, at, Ministry of Finance Fiscal Policy Agency (November 2008)
- Head of State Budget Policy Center Central Budget Policy Center, at Fiscal Policy Agency Ministry of Finance (2008)
- Director at PNPB Directorate, General of Budget Directorate at Ministry of Finance (2011)
- Alternate Governor of the OPEC Fund for Indonesia OPEC Fund for International Development (OFID), Austria (2011-2014)
- Governor of the OPEC Fund for Indonesia OPEC Fund for International Development (OFID), Austria (2014)
- Commissioner of PT Pertamina Gas (2012-2013)
- Commissioner of PT Angkasa Pura I (Persero) (2013-2014)
- Commissioner of PT Bank Mandiri (Persero) Tbk (2014-2019)
- Director General of Budget, Directorate General of Budget, the Ministry of Finance (2013-2021)
- Director General of Customs and Excise Directorate, General Customs and Excise, Ministry of Finance (2021-present)
- Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2019-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
1,752,462 shares



ASMAWI SYAM
Independent Commissioner

Age
69 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Economics from Universitas Hasanuddin (1979)
- Master's degree in Management from Universitas Padjadjaran (2003)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)
- Certified in Indonesia Internal Audit Practitioner by the Institute of Internal Auditors Indonesia (2024)
- Certified in Governance Oversight Professional (CGOP) by the Mitra Kalyana Sejahtera certification Institute (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Independent Commissioner of BNI in the Annual General Meeting of Shareholders (AGMS) in February 20, 2020, based on Deed of AGMS No. 21 dated February 20, 2020, and obtained approval from the Financial Services Authority (FSA) on June 17, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
- Chairmain of the Audit Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, member of the committee, or other positions.

Work Experience
- Division Head, Corporate of PT Bank Rakyat Indonesia (Persero) Tbk (1995- 1996)
- Regional Head, Denpasar of PT Bank Rakyat Indonesia (Persero) Tbk (1999- 2001)
- Regional Head, Bandung of PT Bank Rakyat Indonesia (Persero) Tbk (2001- 2003)
- Division Head, Consumer Banking of PT Bank Rakyat Indonesia (Persero) Tbk (2003-2005)
- Division Head, General Business of PT Bank Rakyat Indonesia (Persero) Tbk (2005-2007)
- Director, Institutional and SOE Business of PT Bank Rakyat Indonesia (Persero) Tbk (2007-2015)
- President Director of PT Bank Rakyat Indonesia (Persero) Tbk (2015-2017)
- President Director of PT Askrindo (Persero) (2017-2018)
- President Director of PT Asuransi Jiwasraya (Persero) (2018)
- Special Staff to the Minister of SOE, Ministry of SOE (2019)
- President Commissioner Non-Independent of PT Bank Tabungan Negara (Persero) Tbk (2019)
- Independent Commissioner of PT Bank Negara Indonesia (Persero), Tbk (2020-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Statement of Independence
The Independence Statement of Independent Commissioner is disclosed in the Corporate Governance Chapter of this Annual Report.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares



SEPTIAN HARIO SETO
Independent Commissioner

Age
40 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Riwayat Pendidikan dan/atau Sertifikasi
- Bachelor's degree in Accounting from Universitas Indonesia (2006)
- Post-Graduate degree in International Finance from SKEMA Business School (2008)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Independent Commissioner of BNI in the Annual General Meeting of Shareholders (AGMS) on February 20, 2020, based on Deed of the AGMS No. 21 dated February 20, 2020, and obtained approval from the Financial Services Authority (FSA) on August 14, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
- Member of the Risk Monitoring Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Member of the Indonesian National Economic Council (2024-current)

Work Experience
- Lecturer and Researcher, Accounting Department, Faculty of Economics and Business, Universitas Indonesia (2004-2010)
- Investment Analyst, Ciptadana Asset Management (2005-2006)
- Junior Auditor, PriceWaterhouseCoopers (PwC) Indonesia (2006-2007)
- Analyst, Principia Management Group (2009-2011)
- Finance Manager, PT Toba Bara Sejahtera Tbk (2011-2015)
- Director/Echelon II at Office of the Staff to the President of the Republic of Indonesia (2015)
- Expert Staff to the Coordinating Minister for Political, Legal and Security Affairs (2015-2016)
- Expert Staff to the Coordinating Minister for Maritime Affairs (2016)
- Special Staff to the Coordinating Minister for Maritime Affairs and Investment (2018-2020)
- Deputy of Investment and Mining Coordination at the Coordinating Ministry for Maritime Affairs and Investment (2020-2024)
- Member of the Indonesian National Economic Council (2024-present)
- Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Statement of Independence
The Independence Statement of Independent Commissioner is disclosed in the Corporate Governance Chapter of this Annual Report.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares



IMAN SUGEMA
Independent Commissioner

Age
60 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Bogor, Indonesia

Education and/or Certification
- Bachelor's degree in Agribusiness from Institut Pertanian Bogor (1987)
- Master's degree in Economics from University of New England (1992)
- Ph.D in Economics from Australian National University (2000)
- Certified in Indonesia Internal Audit Practitioner by the Institute of Internal Auditors Indonesia (2024)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Independent Commissioner of BNI in the Annual General Meeting of Shareholders (AGMS) on February 20, 2020, based on Deed of the AGMS No. 21 dated February 20, 2020, and obtained approval from the Financial Services Authority (FSA) on August 14, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
- Member of the Audit Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Senior Lecturer at Institut Pertanian Bogor (1990-present)

Work Experience
- Senior Lecturer at Institut Pertanian Bogor (1990-present)
- President Commissioner/Independent Commissioner, PT Perusahaan Gas Negara (Persero), Tbk (2015-2016)
- Commissioner, PT Bank Tabungan Negara (Persero) Tbk (2016-2019)
- Independent Commissioner, PT Bank Negara Indonesia (Persero) Tbk (2020-Present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Statement of Independence
The Independence Statement of Independent Commissioner is disclosed in the Corporate Governance Chapter of this Annual Report.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares



ERWIN RIJANTO SLAMET
Independent Commissioner

Age
66 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Economics from Universitas Gadjah Mada (1983)
- Postgraduate Master of Science degree in Economics from University of Illinois, USA (1989)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)
- Certified in Governance Oversight Professional (CGOP) by the Mitra Kalyana Sejahtera certification Institute (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Independent Commissioner of BNI in the Annual General Meeting of Shareholders (AGMS) on March 29, 2021, based on Deed of the AGMS of PT Bank Negara Indonesia (Persero) Tbk No. 14 dated March 29, 2021, and obtained approval from the Financial Services Authority (FSA) on August 6, 2021.

Term of Office
2021-2026 (First Period)

Concurrent Positions
BNI:
- Member of the Risk Monitoring Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, member of the committee, or other positions.

Work Experience
- Head of Section for Supervision of Non-Foreign Exchange Banks, Bank Indonesia (1992-1996)
- Deputy Department Head of Foreign Affairs/INDRA, Bank Indonesia (1996-1999)
- Bank Indonesia 1 Bank Audit Division Head (1999-1999)
- Executive Analyst, Department of Bank Research and Regulation, Bank Indonesia (1999-2001)
- Public Relations Bureau Head for the Governor of Bank Indonesia (2001-2004)
- Deputy Bureau Head for the Governor of Bank Indonesia (2004-2005)
- Principal Researcher, Department of Bank Research and Regulation, Bank Indonesia (2005-2006)
- Deputy Director of Bank Supervision Department 3, Bank Indonesia (2006-2008)
- Director of Bank Supervision Department 3, Bank Indonesia (2008-2010)
- Director of Singapore Representative Office, Bank Indonesia (2010-2013)
- Executive Director of Bank Indonesia Financial System Surveillance Department (2013-2015)
- Executive Director of Bank Indonesia's Macroprudential Policy Department (2015-2017)
- Board of Commissioners Member, Deposit Insurance Corporation
- Ex Officio Bank Indonesia Deposit Insurance Corporation (2017-2020)
- Deputy Governor of Bank Indonesia (2015-2020)
- President Commissioner of PT Aplikasinusa Lintasarta (2021-2023)
- Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2021-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Statement of Independence
The Independence Statement of Independent Commissioner is disclosed in the Corporate Governance Chapter of this Annual Report.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares



FADLANSYAH LUBIS
Commissioner

Age
57 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Law, Universitas Padjadjaran, Indonesia (1992)
- Master's degree in Law, University of Wellington, New Zealand (2002)
- Doctorate in Law, Universitas Gadjah Mada, Indonesia (2012)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Commissioner at the EGMS on August 31, 2022, based on the EGMS Deed of Minutes No. 16 dated August 31, 2022 and obtained approval from the Financial Services Authority (FSA) on December 23, 2022.

Term of Office
2022-2027 (First Period)

Concurrent Positions
BNI:
- Member of the Risk Monitoring Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Deputy Cabinet Secretary, RI Cabinet Secretariat (2021-present).

Work Experience
- Head of the State Apparatus Section, Bureau of the State Apparatus, Regional Government and People's Welfare, Deputy Cabinet Secretary for Legal Affairs, RI Cabinet Secretariat (2006-2011)
- Head of Communication and Informatics at Assistant Deputy for Law, Human Rights, State Apparatus, Communication and Informatics, Deputy for Politics, Law and Security, Republic of Indonesia Cabinet Secretariat (2011)
- Assistant Deputy for Law, Human Rights, State Apparatus, Communication and Informatics, Deputy for Politics, Law and Security, RI Cabinet Secretariat (2011-2014)
- Commissioner of PT Perkebunan Nusantara VI (2013-2016)
- Expert Staff for Law and International Relations, RI Cabinet Secretariat (2014-2015)
- Deputy for Politics, Law and Security, RI Cabinet Secretariat (2015-2021)
- Commissioner of PT Pegadaian (2016-2021)
- President Commissioner of PT Pupuk Kujang (2021-2022)
- Deputy Cabinet Secretary, RI Cabinet Secretariat (2021-present)
- Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2022-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
986,860 shares



ROBERTUS BILLITEA
Commissioner

Age
58 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Depok, Indonesia

Education and/or Certification
- Bachelor of Law Degree from Universitas Krisnadwipayana (1990)
- Master's Degree in Business Law from Universitas Padjadjaran (2009)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Diangkat pertama kali sebagai Komisaris BNI melalui Appointed for the first time as Commissioner at the AGMS on March 15, 2023, based on the AGMS Deed of Minutes No. 15 dated March 15, 2023 and obtained approval from the Financial Services Authority (FSA) on December 11, 2023.

Term of Office
2023-2028 (First Period)

Concurrent Positions
BNI:
- Member of the Nomination and Remuneration Committee
- Member of the Integrated Governance Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Deputy for Law and Legislation at the Ministry of State-Owned Enterprises (2023-present).

Work Experience
- Litigation Lawyer, Soemarjono Herman & Partner Law Firm (1991-1994)
- Senior Legal Officer, PT BBL Dharmala Finance Tbk. Subsidiary of Bangkok Bank Limited (1994-1996)
- Legal Head, PT Profilindo Finance/Nexus Group (1996-1998)
- Corporate Secretary, Nexus Group (1996-1999)
- Legal Director, Indonesian Restructuring Banking Agency/ BPPN (1999-2004)
- Board of Commissioner PT Bank Lippo Tbk (2002-2004)
- Founder/Senior Partner, Law Firm Radjiman Billitea & Partner (2004-2012)
- Executive Director of Legal Affairs, Deposit Insurance Corporation (2012-2019)
- Independent Commissioner, PT Bank Mandiri (Persero) Tbk (2019-2020)
- President Director, PT Bahana Pembinaan Usaha Indonesia (Persero) (2020-2023)
- President Commissioner, PT Bahana Sekuritas (2020-2023)
- Commissioner, PT Bahana Mitra Investa (2020-2023)
- Deputy for Law and Legislation, Ministry of State-Owned Enterprises (2023-present)
- Commissioner, PT Bank Negara Indonesia (Persero) Tbk (2023-present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
864,066 shares



MOHAMAD YUSUF PERMANA
Commissioner

Age
49 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Economics from Universitas Gunadarma (1999)
- Certified in Bank Risk Management Competency Level 6 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Commissioners
Appointed for the first time as Commissioner at the AGMS on March 4, 2024, based on the AGMS Deed of Minutes No. 3 dated March 4, 2024 and obtained approval from the Financial Services Authority (FSA) on September 2, 2024.

Term of Office
2024-2029 (First Period)

Concurrent Positions
BNI:
- Member of the Integrated Governance Committee
- Member of the Nomination and Remuneration Committee

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Companies/Institutions:
Deputy for Protocol, Press and Media of the Presidential Secretariat, Ministry of State Secretariat of the Republic of Indonesia (2024-current).

Work Experience
- Head of Invitation Preparation Subdivision, Ministry of State Secretariat of the Republic of Indonesia (2008-2015)
- Head of Subdivision for Preparing Accompanying Events, Ministry of State Secretariat of the Republic of Indonesia (2015-2016)
- Head of Ceremony Section, Ministry of State Secretariat of the Republic of Indonesia (2016-2021)
- Commissioner of PT Pelayaran Samudera Djakarta Lloyd (2020-2021)
- Commissioner of PT Pelabuhan Indonesia I (2021)
- Commissioner of PT Pelindo Multi Terminal (2021-2023)
- Commissioner of PT Bank Tabungan Negara (Persero) Tbk (2023-2024)
- Head of Protocol Bureau of the Presidential Secretariat, Ministry of State Secretariat of the Republic of Indonesia (2021-2024)
- Deputy for Protocol, Press and Media of the Presidential Secretariat, Ministry of State Secretariat of the Republic of Indonesia (2024-present)
- Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2024- present)

Affiliated Relationships
Has no affiliated relationships with the other members of the Board of Commissioners, the Board of Directors or with the Majority and Controlling Shareholders.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Commissioners in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares

BOARD OF COMMISSIONERS' AFFILIATED RELATIONSHIPS

Board of Commissioners' Affiliated Relationships

Financial, Familial, and Management Relationships of the Board of Commissioners															
Name	Position	Familial Relationship With						Financial Relationship With						Management Relations at BNI, Subsidiaries and Affiliated Companies	
		Board of Commissioners		Board of Directors		Majority and Controlling Shareholder*		Board of Commissioners		Board of Directors		Majority and Controlling Shareholder*			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Pradjoto	President Commissioner/ Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Pahala Nugraha Mansury	Vice President Commissioner		✓		✓		✓		✓		✓		✓		✓
Sigit Widyawan	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Askolani	Commissioner		✓		✓		✓		✓		✓		✓		✓
Asmawi Syam	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Septian Hario Seto	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Iman Sugema	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Erwin Rijanto Slamet	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Fadlansyah Lubis	Commissioner		✓		✓		✓		✓		✓		✓		✓
Robertus Billiitea	Commissioner		✓		✓		✓		✓		✓		✓		✓
Mohamad Yusuf Permana	Commissioner		✓		✓		✓		✓		✓		✓		✓

* Directly or indirectly

CHANGES IN THE BOARD OF COMMISSIONERS MEMBER COMPOSITION AND REASONS FOR THE CHANGES

During 2024, there was 1 (one) change in the composition of the Board of Commissioners members to continue to improve BNI's performance. Based on the decision of the Annual GMS held on March 4, 2024, the changes in the composition of the Board of Commissioners are as follows:

Composition of the Board of Commissioners for the January 1, 2024 - March 4, 2024 Period

The composition of the Board of Commissioners for the January 1, 2024 to March 4, 2024 period had 11 (eleven) members consisting of 1 (one) President Commissioner concurrently Independent Commissioner, 1 (one) Vice President Commissioner, 5 (five) Independent Commissioners and 4 (four) Commissioners. The composition and basis of appointment of the Board of Commissioners can be seen in the table below.

Composition of the Board of Commissioners for the January 1, 2024 - March 4, 2024 Period

No	Name	Position	Domicile	Basis of Appointment	Effective Date*
1	Pradjoto	President Commissioner/ Independent Commissioner	Jakarta	EGMS Decision on September 19, 2023	February 19, 2024
2	Pahala Nugraha Mansury	Vice President Commissioner	Jakarta	EGMS Decision on September 19, 2023	February 19, 2024
3	Askolani	Commissioner	Jakarta	EGMS Decision on August 30, 2019	December 20, 2019
4	Susyanto	Commissioner	Bogor	AGMS Decision on February 20, 2020	July 27, 2020
5	Fadlansyah Lubis	Commissioner	Jakarta	EGMS Decision on August 31, 2022	December 23, 2022

No	Name	Position	Domicile	Basis of Appointment	Effective Date*
6	Robertus Billitea	Commissioner	Depok	AGMS Decision on March 15, 2023	December 11, 2023
7	Erwin Rijanto Slamet	Independent Commissioner	Jakarta	AGMS Decision on March 29, 2021	August 6, 2021
8	Sigit Widyawan	Independent Commissioner	Solo	AGMS Decision on March 15, 2023	March 15, 2023
9	Asmawi Syam	Independent Commissioner	Jakarta	AGMS Decision on February 20, 2020	June 17, 2020
10	Septian Hario Seto	Independent Commissioner	Jakarta	AGMS Decision on February 20, 2020	August 14, 2020
11	Iman Sugema	Independent Commissioner	Bogor	AGMS Decision on February 20, 2020	August 14, 2020

*) The Board of Commissioners becomes effective after obtaining FSA approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/POJK.03/2016 dated July 22, 2016 concerning Fit and Proper Test for Main Parties of Financial Services Institutions.

Composition of the Board of Commissioners for the March 4, 2024 - December 31, 2024 Period

On March 4, 2024, the 2024 Annual GMS decided to change the composition of the BNI Board of Commissioners as follows:

1. Honorably discharged Susyanto as Commissioner;
2. Honorably discharged Askolani as Commissioner;
3. Appointed the names mentioned below as the Company's Management:
   a. Askolani as Commissioner;
   b. Mohamad Yusuf Permana as Commissioner.

Thus, the composition of the Board of Commissioners for the March 4, 2024 to December 31, 2024 period had 11 (eleven) members consisting of 1 (one) President Commissioner concurrently as Independent Commissioner, 1 (one) Vice President Commissioner, 5 (five) Independent Commissioners and 4 (four) Commissioners. The composition and basis of appointment of the Board of Commissioners can be seen in the table below. [ACGS (B).D.4.1]

Composition and Basis for Appointing the Board of Commissioners

No	Name	Position	Domicile	Basis of Appointment	Period in Office	Effective Date*
1	Pradjoto	President Commissioner/ Independent Commissioner	Jakarta	EGMS Decision on September 19, 2023	2020-2025 (First Period)**	February 19, 2024
2	Pahala Nugraha Mansury	Vice President Commissioner	Jakarta	EGMS Decision on September 19, 2023	2023-2028 (First Period)	February 19, 2024
3	Sigit Widyawan	Independent Commissioner	Solo	AGMS Decision on March 15, 2023	2023-2028 (Second Period)	March 15, 2023
4	Askolani	Commissioner	Jakarta	EGMS Decision on August 30, 2019	2024-2029 (Second Period)	March 4, 2024
5	Asmawi Syam	Independent Commissioner	Jakarta	AGMS Decision on February 20, 2020	2020-2025 (First Period)	June 17, 2020
6	Septian Hario Seto	Independent Commissioner	Jakarta	AGMS Decision on February 20, 2020	2020-2025 (First Period)	August 14, 2020
7	Iman Sugema	Independent Commissioner	Bogor	AGMS Decision on February 20, 2020	2020-2025 (First Period)	August 14, 2020
8	Erwin Rijanto Slamet	Independent Commissioner	Jakarta	AGMS Decision on March 29, 2021	2021-2026 (First Period)	August 6, 2021
9	Fadlansyah Lubis	Commissioner	Jakarta	EGMS Decision on August 31, 2022	2022-2027 (First Period)	December 23, 2022
10	Robertus Billitea	Commissioner	Depok	AGMS Decision on March 15, 2023	2023-2028 (First Period)	September 11, 2023
11	Mohamad Yusuf Permana	Commissioner	Bogor	AGMS Decision on February 20, 2020	2024-2029 (First Period)	September 2, 2024

*) The Board of Commissioners becomes effective after obtaining FSA approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/POJK.03/2016 dated July 22, 2016 concerning Fit and Proper Test for Main Parties of Financial Services Institutions.
**) Following his previous term as Deputy President Commissioner/Independent Commissioner of BNI.

Board of Directors' Profiles [ACGS C.2.5, D.4.1]



ROYKE TUMILAAR
President Director

Age
60 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Economics in Management from Universitas Trisakti (1987)
- Master of Business Administration in Finance from University of Technology, Sydney, Australia (1999)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute (LSPP) (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed for the first time as President Director of BNI through the Extraordinary GMS resolution dated September 2, 2020, which was notarized through the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 1 dated September 2, 2020, and received approval from FSA through No. SR-376/PB.12/2020 dated November 19, 2020.

Term of Office
2020-2025 (First Period).

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, member of the committee, or other positions in other companies.

Work Experience
- Credit Analyst, PT Bank Mandiri (Persero) Tbk (1988)
- Corporate Dealer, PT Bank Mandiri (Persero) Tbk (1991)
- Relationship Manager – Treasury Division, PT Bank Mandiri (Persero) Tbk (1995)
- Senior Officer Manager, PT Bank Mandiri (Persero) Tbk (1999)
- Department Head (Vice President) Corporate Banking, PT Bank Mandiri (Persero) Tbk (2005)
- Authority Holder Credit Decision (Group Head) Commercial Banking, PT Bank Mandiri (Persero) Tbk (2006)
- Group Head, Regional Commercial Sales II, PT Bank Mandiri (Persero) Tbk (2007)
- President Commissioner, PT Staco Jasapratama (General Insurance) (2008)
- Commissioner, PT Mandiri Sekuritas (2009)
- Group Head, Regional Commercial Sales I, PT Bank Mandiri (Persero) Tbk (2010)
- Group Head Jakarta Commercial Sales PT Bank Mandiri (Persero) Tbk (2011)
- Director, Treasury, FI & Special Asset Management, PT Bank Mandiri (Persero) Tbk (2015)
- Director, Corporate Banking, PT Bank Mandiri (Persero) Tbk (2015)
- Director, Wholesale Banking, PT Bank Mandiri (Persero) Tbk (2017)
- Director, Corporate Banking, PT Bank Mandiri (Persero) Tbk (2018)
- President Director, PT Bank Mandiri (Persero) Tbk (2019)
- President Director, PT Bank Negara Indonesia (Persero) Tbk (2020–present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
3,656,941 shares



PUTRAMA WAHJU SETYAWAN
Deputy President Director

Age
55 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Bekasi, Indonesia

Education and/or Certification
- Bachelor of Forestry Engineering from University of Gadjah Mada (1994)
- Master of Management in Accounting from University Gadjah Mada (1996)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute (LSPP) (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Extraordinary GMS resolution dated August 31, 2022, which was notarized through the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 16 dated August 31, 2022, and received approval from Financial Financial Services Authority (OJK) on December 19, 2022.

Reappointed as Deputy President Director of BNI through the Annual GMS resolution dated March 4, 2024, notarized by Deed of Annual General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 3 dated March 4, 2024, and received approval from the Financial Services Authority No. KEPR-103/D.03/2024 dated August 30, 2024.

Term of Office
2022-2027 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Senior Executive Vice President Medium Business PT Bank Negara Indonesia (Persero) Tbk (2016)
- Director of Medium Business of PT Bank Negara Indonesia (Persero) Tbk (2016)
- Director of Corporate Business of PT Bank Negara Indonesia (Persero) Tbk (2018)
- Director of Treasury and International of PT Bank Negara Indonesia (Persero) Tbk (2020)
- President Director of PT Jaminan Kredit Indonesia (2022)
- Director of Treasury of PT Bank Negara Indonesia (Persero) Tbk (2022-2023)
- Director of Retail Banking of PT Bank Negara Indonesia (Persero) Tbk (2023-2024)
- Deputy President Director of PT Bank Negara Indonesia (Persero) Tbk (2024- present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
3,879,526 shares



NOVITA WIDYA ANGGRAINI
Finance Director

Age
48 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Economics Degree in Accounting from Universitas Islam Indonesia (2000)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Extraordinary GMS resolution dated September 2, 2020, notarized by the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 1 dated September 2, 2020, which received approval through OJK No. SR-376/PB.12/2020 dated November 19, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- SR PS Reporting Regulatory, PT Bank Mandiri (Persero) Tbk (2004)
- Team Leader, Statutory Reporting, PT Bank Mandiri (Persero) Tbk (2009)
- Department Head Financial Reporting, PT Bank Mandiri (Persero) Tbk (2013)
- Department Head Performance Management, PT Bank Mandiri (Persero) Tbk (2015)
- Group Head, Accounting, PT Bank Mandiri (Persero) Tbk (2017)
- Group Head, Strategy & Performance Management, PT Bank Mandiri (Persero) Tbk (2020)
- Finance Director, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
3,143,884 shares



CORINA LEYLA KARNALIES
Retail Banking Director

Age
56 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Physics Degree from the University of Indonesia (1992).
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Annual GMS resolution dated February 20, 2020, notarized by the PT Bank Negara Indonesia (Persero) Tbk Annual General Meeting of Shareholders resolution No. 21 dated February 20, 2020, which received approval through FSA No. SR-171/PB.12/2020 dated June 25, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Senior Collector/Leader, Citibank (1995)
- Collection Head, Standard Chartered Bank (1997)
- Collection & Recovery Head, Bank Universal (1999)
- Credit Department Manager, Bank Universal (2000)
- Deputy Card Management, Bank Universal (2003)
- Operation Credit Card Division Head, PT Bank Permata Tbk (2003)
- Credit Support & Risk Management Division Head, PT Bank CIMB Niaga Tbk (2005)
- Retail Collection & Recovery Group Head, PT Bank CIMB Niaga Tbk (2006)
- Collection & Recovery Head Consumer Banking, ABN Amro Bank(2007)
- Collection & Recovery Head RBS/A, Amro Bank (2007)
- VP, Deputy Division Head Operations Credit Card & Acquiring Business, PT Bank Negara Indonesia (Persero) Tbk (2010)
- VP, Deputy Division Head, Collection Management, PT Bank Negara Indonesia (Persero) Tbk (2013)
- SVP – Division Head, Card Business, PT Bank Negara Indonesia (Persero) Tbk (2015)
- SVP – Division Head, Product Development Management, PT Bank Negara Indonesia (Persero) Tbk (2018)
- SVP – Division Head, Data Management and Analytics, PT Bank Negara Indonesia (Persero) Tbk (2019)
- Consumer Banking Director, PT Bank Negara Indonesia (Persero) Tbk (2020-2023)
- Digital & Integrated Transaction Banking Director, PT Bank Negara Indonesia (Persero) Tbk (2023-2024)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
3,506,474 shares



DAVID PIRZADA
Risk Management Director

Age
56 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Electrical Engineering from Northeastern University, Boston, Massachusetts, USA (1990)
- Master of Business Administration in Business Management from New Hampshire College, Manchester, USA (1992)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Extraordinary GMS resolution dated September 2, 2020, notarized by the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 1 dated September 2, 2020, which received approval through OJK No. SR-386/PB.12/2020 dated November 30, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Account Officer, The Bank of Tokyo – Mitsubishi UFJ Ltd (1993)
- Senior Analyst, The Bank of Tokyo – Mitsubishi UFJ Ltd (2000)
- Co-Head of Commercial Portfolio Administration, The Bank of Tokyo – Mitsubishi UFJ Ltd (2005)
- Head of Commercial Portfolio Administration, The Bank of Tokyo – Mitsubishi UFJ Ltd (2007)
- Head of Credit and Market Middle Department, The Bank of Tokyo – Mitsubishi UFJ Ltd (2009)
- Head of Risk Administration Department, The Bank of Tokyo – Mitsubishi UFJ Ltd (2010)
- Country Chief Risk Officer, The Bank of Tokyo – Mitsubishi UFJ Ltd (2015)
- SEVP, Wholesale Risk, PT Bank Mandiri (Persero) Tbk (2018)
- Risk Management Director, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
2,859,984 shares



RONNY VENIR
Network & Services Director

Age
57 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Animal Husbandry from Universitas Padjadjaran (1993)
- Master's degree in Agribusiness from Institut Pertanian Bogor (2000)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Extraordinary GMS resolution dated September 2, 2020, which was notarized by the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 1 dated September 2, 2020, which received approval through OJK No. SR-361/PB.12/2020 dated November 5, 2020.

Term of Office
2020-2025 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Manager, Business Marketing, Tebet Branch, PT Bank Negara Indonesia (Persero) Tbk (1995)
- Supervisor, Product marketing, Pecenongan Branch, PT Bank Negara Indonesia (Persero) Tbk (1997)
- Manager, Business Services Coordination, PT Bank Negara Indonesia (Persero) Tbk (2003)
- Manager, Partnership & Program Marketing, PT Bank Negara Indonesia (Persero) Tbk (2004)
- Relationship Manager, Small Business Marketing, Small Business Division, PT Bank Negara Indonesia (Persero) Tbk (2005)
- AVP, Small Business Marketing, Small Business Division, PT Bank Negara Indonesia (Persero) Tbk (2006)
- Team Leader, Business Development, Small Business Division, PT Bank Negara Indonesia (Persero) Tbk (2007)
- Head of Small Credit Center, Graha Pangeran Surabaya, PT Bank Negara Indonesia (Persero) Tbk (2008)
- Deputy Division Head, Small Business, PT Bank Negara Indonesia (Persero) Tbk (2010)
- Deputy Division Head, Commercial & Smalll Business PT Bank Negara Indonesia (Persero) Tbk (2012)
- Head of Business Banking, Palembang Regional Office, PT Bank Negara Indonesia (Persero) Tbk (2014)
- Regional Head, 02 (Sumbar, Riau, Kepri) Regional Office, PT Bank Negara Indonesia (Persero) Tbk (2016)
- Regional Head, 12 (Jakarta Kota) Regional Office, PT Bank Negara Indonesia (Persero) Tbk (2017)
- Head of Small Business Division, PT Bank Negara Indonesia (Persero) Tbk (2018)
- SEVP, Medium Business, PT Bank Negara Indonesia (Persero) Tbk (2018)
- SEVP, Network, PT Bank Negara Indonesia (Persero) Tbk (2019)
- Network and Services Director, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
3,539,596 shares



MUCHAROM
Human Capital & Compliance Director

Age
55 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Economics and Development Studies from Universitas Gadjah Mada (1995)
- Master of Management in International Business from Universitas Gadjah Mada (1997)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Extraordinary GMS resolution dated August 31, 2022, notarized by the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 16 dated August 31, 2022, which received approval through OJK No. KEP-1/D.03/2022 dated January 2, 2023.

Term of Office
2022-2027 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Pengalaman Kerja
- Deputy Head of Operational Risk Division (2008-2011)
- Head of Network & Service Makassar Regional Office (2011-2012)
- Head of Makassar Regional Office (2012-2015)
- General Manager of BNI Hong Kong Overseas Branch Office (2015-2016)
- Head of Policy Governance Division (2016-2017)
- Head of Strategic Planning Division (2017-2021)
- Senior Vice President of Corporate Communication & Secretarial Division (2021-2022)
- Human Capital & Compliance Director of PT Bank Negara Indonesia (Persero) (2022-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
2,541,148 shares



TOTO PRASETIO
Technology & Operations Director

Age
58 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Diploma in Mechanical Engineering, University of Stuttgart, Germany (1989)
- Diploma in Mechanical Engineering, University of Stuttgart, Germany (1992)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of theBanking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Extraordinary GMS resolution dated August 31, 2022, notarized by the PT Bank Negara Indonesia (Persero) Tbk Extraordinary General Meeting of Shareholders resolution No. 16 dated August 31, 2022, which received approval through OJK No. KEP-13/D.03/2023 dated January 26, 2023.

Term of Office
2022-2027 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Head of IT Project Management, PT Bank Mega Tbk (2015-2017)
- Group Head IT Application Support, PT Bank Mandiri (Persero) Tbk (2017-2019)
- SEVP Information Technology, PT Bank Mandiri (Persero) Tbk (2019-2022)
- Technology & Operations Director, PT Bank Negara Indonesia (Persero) Tbk (2022-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
2,163,696 shares



I MADE SUKAJAYA

Enterprise and Commercial Banking Director

Age
56 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Agriculture Degree from Udayana University (1992)
- Master Degree in Financial Management from Universitas Persada Indonesia Y.A.I. (2004)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Annual GMS resolution dated March 4, 2024, notarized by the PT Bank Negara Indonesia (Persero) Tbk Annual General Meeting of Shareholders resolution No. 3 dated March 4, 2024, which received approval through OJK No. KEP-101/D.03/2024 dated August 30, 2024.

Term of Office
2024-2029 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Deputy General Manager, Tokyo branch PT. Bank Negara Indonesia (Persero) Tbk (2016-2019)
- Deputy Division Head, International PT. Bank Negara Indonesia (Persero) Tbk (2019)
- Head of Regional Office 08 Denpasar of PT Bank Negara Indonesia (Persero) Tbk (2019-2020)
- Division Head, Corporate Business 1 of PT Bank Negara Indonesia (Persero) Tbk (2020-2023)
- Commissioner of PT BNI Sekuritas (2022-2024)
- SEVP Remedial & Recovery of PT Bank Negara Indonesia (Persero) Tbk (2023-2024)
- Director, Enterprise & Commercial Banking PT Bank Negara Indonesia (Persero) Tbk (2024-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
576,912 shares



HUSSEIN PAOLO KARTADJOEMENA

Digital and Integrated Transaction Banking Director

Age
45 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Economics Degree from Harvard University (2002).
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Annual GMS resolution dated March 4, 2024, notarized by the PT Bank Negara Indonesia (Persero) Tbk Annual General Meeting of Shareholders resolution No. 3 dated March 4, 2024, which received approval through OJK No. KEP-102/D.03/2024 dated August 30, 2024.

Term of Office
2024-2029 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- SVP Corporate Development, PT Bank Mandiri (Persero) Tbk (2012)
- General Manager, Corporate Finance & Investor Relations, PT Apexindo Pratama Duta Tbk (2014)
- Chief Executive Officer of PT Royal Indo Mandiri (2017)
- Chief Executive Officer of PT Royal Lestari Utama (2018)
- Senior Executive Vice President & Chief Transformation Officer, PT Bank Mandiri (Persero) Tbk (2020)
- Senior Executive Vice President - Corporate Development & Transformation, PT Bank Negara Indonesia (Persero) Tbk (2020-2024)
- President Commissioner of PT Bank Hibank Indonesia (2023-2024)
- Director, Digital and Integrated Transaction Banking of PT Bank Negara Indonesia (Persero) Tbk (2024- present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
918,611 shares



AGUNG PRABOWO

Wholesale and International Banking Director

Age
54 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Accounting and Business Administration degree, University of Kansas, USA (1994)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Annual GMS resolution dated March 4, 2024, notarized by the PT Bank Negara Indonesia (Persero) Tbk Annual General Meeting of Shareholders resolution No. 3 dated March 4, 2024, which received approval through OJK No. KEP-120/D.03/2024 dated October 7, 2024.

Term of Office
2024-2029 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Director of PT UBS Sekuritas Indonesia (2013-2021)
- President Director of PT BNI Sekuritas (2021-2024)
- Director, Wholesale and International Banking of PT Bank Negara Indonesia (Persero) Tbk (2024-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
101,356 shares



MUNADI HERLAMBANG*)

Institutional Banking Director

Age
45 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Chemical Engineering from Institut Teknologi Sepuluh November (1997)
- Master's degree in International Business from University of London (2003)
- Doctorate (S3) in Leadership and Policy Innovation from Universitas Gadjah Mada (2024)
- Certified in Bank Risk Management Competency Level 7 by the Professional Certification Institute of the Banking Professional Certification Agency (2024)

Position History:

Legal Basis of Appointment as Member of the Company's Board of Directors
Appointed as Director of BNI through the Annual GMS resolution dated March 4, 2024, notarized by the PT Bank Negara Indonesia (Persero) Tbk Annual General Meeting of Shareholders resolution No. 3 dated March 4, 2024, and is currently in the process of the OJK Fit and Proper Test.

Term of Office
2024-2029 (First Period)

Concurrent Positions
BNI:
Concurrently, serves as Chairman/Deputy Chairman/Member of committees under the Board of Directors, as described in the Corporate Governance chapter of the Committees under the Board of Directors sub-chapter.

Other Public Companies:
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Director of Finance, HC and Risk Management of PT Wijaya Karya Bitumen (2019-2021)
- Director of Institutional Relations of PT Jasa Raharja (2021-2024)
- Institutional Banking Director of PT Bank Negara Indonesia (Persero) Tbk (2024-present)

Affiliated Relationships
Has no affiliated relationships with members of the Board of Directors, the Board of Commissioners or with the Majority and Controlling Shareholders, either directly or indirectly with individual owners.

Education and Training in 2024
Education and training in 2024 is presented separately in the Training and/or Competency Improvement section of the Board of Directors in this Annual Report.

BBNI Share Ownership as at December 31, 2024
Does not own BBNI shares

*) Has not been effective.

BOARD OF DIRECTORS' AFFILIATED RELATIONSHIPS

Board of Directors' Affiliated Relationships

Financial, Familial, and Management Relationships of the Board of Directors														
Name	Position	Familial Relationship With						Financial Relationship With						Management Relations at BNI, Subsidiaries and Affiliated Companies	
		Board of Commissioners		Board of Directors		Majority and Controlling Shareholder*		Board of Commissioners		Board of Directors		Majority and Controlling Shareholder*			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Royke Tumilaar	President Director		✓		✓		✓		✓		✓		✓		✓
Putrama Wahju Setyawan	Deputy President Director		✓		✓		✓		✓		✓		✓		✓
Novita Widya Anggraini	Finance Director		✓		✓		✓		✓		✓		✓		✓
Corina Leyla Karnalies	Retail Banking Director		✓		✓		✓		✓		✓		✓		✓
David Pirzada	Risk Management Director		✓		✓		✓		✓		✓		✓		✓
Ronny Venir	Network and Services Director		✓		✓		✓		✓		✓		✓		✓
Mucharom	Human Capital and Compliance Director		✓		✓		✓		✓		✓		✓		✓
Toto Prasetio	Technology and Operations Director		✓		✓		✓		✓		✓		✓		✓
I Made Sukajaya	Enterprise and Commercial and Banking Director		✓		✓		✓		✓		✓		✓		✓
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director		✓		✓		✓		✓		✓		✓		✓
Agung Prabowo	Wholesale and International Banking Director		✓		✓		✓		✓		✓		✓		✓
Munadi Herlambang**	Institutional Banking Director		✓		✓		✓		✓		✓		✓		✓

*) Directly or indirectly
**) Has not been effective

CHANGES IN THE BOARD OF DIRECTORS MEMBER COMPOSITION AND REASONS FOR THE CHANGES

During 2024, there was 1 (one) change in the composition of the Board of Directors to continue to grow BNI's performance. Based on the decision of the Annual GMS for Financial Year 2023 held on March 4, 2024, the changes in the composition of the Board of Directors are as follows:

January 1, 2024 - March 4, 2024 Period

In January 1, 2024 - March 4, 2024 period, the BNI Board of Directors had 12 (twelve) members consisting of 1 (one) President Director, 1 (one) Deputy President Director, and 10 (ten) Directors.

Composition of the Board of Directors for the January 1, 2024 - March 4, 2024 Period

Name	Position	Domicile	Basis of Appointment	Term of Office	Effective Date*
Royke Tumilaar	President Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Adi Sulistyowati	Deputy President Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (Second Period)	November 6, 2020
Novita Widya Anggraini	Finance Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Corina Leyla Karnalies	Digital and Integrated Transaction Banking Director	Jakarta	AGMS Decision on February 20, 2020	2020-2025 (First Period)	June 26, 2020
Sis Apik Wijayanto	Enterprise and Commercial and Banking Director	Jakarta	AGMS Decision on February 20, 2020	2020-2025 (First Period)	June 26, 2020
David Pirzada	Risk Management Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	December 1, 2020
Silvano Winston Rumantir	Wholesale and International Banking Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	December 1, 2020
Ronny Venir	Network and Services Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 6, 2020
Muhammad Iqbal	Institutional Banking Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Putrama Wahju Setyawan	Retail Banking Director	Bekasi	EGMS Decision on August 31, 2022	2022-2027 (First Period)	December 23, 2022
Mucharom	Human Capital and Compliance Director	Jakarta	EGMS Decision on August 31, 2022	2022-2027 (First Period)	January 6, 2023
Toto Prasetio	Technology and Operations Director	Jakarta	EGMS Decision on August 31, 2022	2022-2027 (First Period)	January 31, 2023

*) The Board of Directors took office after obtaining FSA approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/ POJK.03/2016 dated July 22, 2016 concerning Fit and Proper Test for Main Parties of Financial Services Institutions.

March 4, 2024 - December 31, 2024 Period

In March 4, 2024 - December 31, 2024 period, there were changes in the composition and transfer of assignment between members of the Board of Directors in accordance with the Annual GMS hel on March 4, 2024 as follows:

1. Honorably discharged the following names as the Management of the Company:
   a. Adi Sulistyowati as Deputy President Director;
   b. Sis Apik Wijayanto as Enterprise and Commercial Banking Director;
   c. Muhammad Iqbal as Institutional Banking Director;
   d. Silvano Winston Rumantir as Wholesale and International Banking Director;
2. Transfer of assignment of the names mentioned below as members of the Company's Board of Directors as follows:
   a. Putrama Wahju Setyawan from Director of Retail Banking to Deputy President Director;
   b. Corina Leyla Karnalies, previously Digital and Integrated Transaction Banking Director, becomes Retail Banking Director;
3. Appointing the names mentioned below as members of the Company's Board of Directors:
   a. I Made Sukajaya as Enterprise & Commercial Banking Director;
   b. Hussein Paolo Kartadjoemena as Digital & Integrated Transaction Banking Director;
   c. Agung Prabowo as Wholesale & International Banking Director;
   d. Munadi Herlambang as Institutional Banking Director;

Thus, the Board of Directors composition for March 4, 2024 - December 31, 2024 period had 12 (twelve) members consisting of 1 (one) President Director, 1 (one) Deputy President Director, and 10 (ten) Directors. The composition and basis of appointment of the Board of Directors can be seen in the table below:

Composition of the Board of Directors for the March 4, 2024 - December 31, 2024 Period Table

Name	Position	Domicile	Basis of Appointment	Period in Office	Effective Date*
Royke Tumilaar	President Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Putrama Wahju Setyawan	Deputy President Director	Bekasi	AGMS Decision on March 4, 2024	2022-2027 (First Period)	September 2, 2024
Novita Widya Anggraini	Finance Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 19, 2020
Corina Leyla Karnalies	Retail Banking Director	Jakarta	AGMS Decision on February 20, 2020	2020-2025 (First Period)	June 26, 2020
David Pirzada	Risk Management Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	December 1, 2020
Ronny Venir	Network and Services Director	Jakarta	EGMS Decision on September 2, 2020	2020-2025 (First Period)	November 6, 2020
Mucharom	Human Capital and Compliance Director	Jakarta	EGMS Decision on August 31, 2022	2022-2027 (First Period)	January 6, 2023
Toto Prasetio	Technology and Operations Director	Jakarta	EGMS Decision on August 31, 2022	2022-2027 (First Period)	January 31, 2023
I Made Sukajaya	Enterprise and Commercial and Banking Director	Jakarta	AGMS Decision on March 4, 2024	2024-2029 (First Period)	September 2, 2024
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Jakarta	AGMS Decision on March 4, 2024	2024-2029 (First Period)	September 2, 2024
Agung Prabowo	Wholesale and International Banking Director	Jakarta	AGMS Decision on March 4, 2024	2024-2029 (First Period)	October 9, 2024
Munadi Herlambang**	Institutional Banking Director	Jakarta	AGMS Decision on March 4, 2024	2024-2029 (First Period)	Has not been effective

*) The Board of Directors took office after obtaining FSA approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/ POJK.03/2016 dated July 22, 2016 concerning Fit and Proper Test for Main Parties of Financial Services Institutions.
**) Has not been effective.

Information on Changes in the Composition of Members of the Board of Directors and/or Members of the Board of Commissioners that Occurred after the Financial Year

There were no changes in the composition of Members of the Board of Directors and/or Members of the Board of Commissioners after the financial year 2024 until the deadline for submitting the Annual Report.

Senior Executive President Profiles



ITA TETRALASTWATI

SEVP Treasury

Age
54 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Economics from Universitas Gadjah Mada (1996)
- Level 6 Risk Management Commitment by the Risk Management Certification Agency (BSMR) (2024)
- Competency in Financing Sub-Sector Supervision Qualification Level 6 by the National Professional Certification Agency (2024)
- Advance Level Treasury Dealer Competency by the Banking Professional Certification Institute (2023)

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Treasury based on Decision of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk No. KP/374/ DIR/R dated November 9, 2020.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions
Commissioner of PT BNI Multifinance (2024 – present) (currently, Fit & Proper Test process by FSA)

Work Experience
- Money Market Dealer, PT Bank Pembangunan Indonesia (Persero) (1998)
- Cash & Liquidity Dealer, PT Bank Mandiri (Persero) Tbk (1999)
- Fixed Income Dealer, PT Bank Mandiri (Persero) Tbk (2007)
- Money Market Dealer, PT Bank Mandiri (Persero) (2008)
- Chief Dealer, Treasury Cash & Liquidity Management, PT Bank Mandiri (Persero) (2009)
- Vice President, Treasury Interest Rate Trading, PT Bank Mandiri (Persero) (2011)
- Vice President, Treasury FX Trading, PT Bank Mandiri (Persero) (2015)
- Senior Vice President, Market Risk, PT Bank Mandiri (Persero) (2016)
- Non-Executive Director Bank Mandiri Europe Limited (2018)
- Senior Vice President, Market & Operational Risk, PT Bank Mandiri (Persero) (2020)
- Senior Executive Vice President, Treasury, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.



RIAN ERIANA KASLAN

SEVP Retail Digital Solutions

Age
48 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Arts in Business Administration, Clark University, USA, (1999)
- Master of Business Administration in International Management and Marketing, Boston University, USA, (2006)
- Level 7 Risk Management Competency Certification issued by Risk Management Certification Agency (BSMR) (2024)
- Executive Overview for Commissioner of PT Bank HiBank Indonesia by LPPI (2024)

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Retail Digital Solutions based on Decision of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk No. KP/340/DIR/R dated July 28, 2021.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions
President Commissioner of PT Bank Hibank Indonesia (2024-present).

Work Experience
- AVP, Client Service Manager - Bank of New York Mellon, Boston, United of America (1999 - 2000)
- Executive Vice President, Commonwealth Bank Indonesia, Jakarta, Head of Digital Strategy & Delivery (2006-2021)
- Senior Executive Vice President - Retail Digital Solutions PT Bank Negara Indonesia (Persero) Tbk (2021-present)
- President Commissioner of PT BNI Capital Ventura (2022-2024)
- President Commissioner of PT Bank Hibank Indonesia (2024 - present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.



VICTOR ERICO KOROMPIS

SEVP Information Technology

Age
50 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bina Nusantara University (1992-1996)
- Universitas Indonesia (Master of Information Technology) Graduated with Cum Laude (1999-2001)
- The Innovative Technology Leader at Standford University (2023)
- Venture Capital Executive Program by Berkeley University San Fransisco (2024)
- Level 6 Risk Management Competency Certification issued by Risk Management Certification Agency (BSMR) (2024)

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Information Technology based on PT Bank Negara Indonesia (Persero) Tbk Board of Directors Decision No. DIR/006/R dated January 20, 2023.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions
Komisaris Utama PT BNI Modal Ventura (2024 – saat ini)

Work Experience
- IBM Business Partner - PT Mitra Integrasi Komputindo (1996-2002)
- AVP, IT Programme Management Office Head – PT Bank Danamon Indonesia Tbk(2001-2014)
- Vice President, IT Cons. Finance, Touchpoint& Payment Head – PT Bank Danamon Indonesia Tbk (2004 - 2007)
- Senior VP, IT Electronic Channels and Card Head (2007 – 2010)
- Executive VP, IT Business Solution & System Integration Head – PT Bank Danamon Indonesia Tbk (2010 – 2016)
- Acting Chief Information Officer - PT Bank Danamon Indonesia Tbk (2015 –2016)
- Senior Vice President, Head of Information Technology - PT Bank Danamon Indonesia Tbk (2016 –2018)
- Senior Vice President, Head of Digital Banking Delivery Group – PT Bank Danamon Indonesia Tbk (2019 - 2022)
- Senior Executive Vice President Information Technology – PT Bank Danamon Indonesia Tbk (Persero) Tbk (2022 – present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.



STEVEN SURYANA

SEVP Wealth Management

Age
52 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Economics Degree from Universitas Tarumanegara
- Level 6 Risk Management Competency Certification issued by Risk Management Certification Agency (BSMR) (2024)

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Wealth Management based on PT Bank Negara Indonesia (Persero) Tbk Board of Directors Decision No. DIR/062 dated May 16, 2023.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- General Manager – Standard Chartered Bank Philippines (2007)
- Head of Wealth Management - ABN AMRO Bank (Royal bank of Scotland) (2007-2010))
- Group Head, Sales & Marketing – PT Manulife Aset Manajemen Indonesia (2010-2011)
- SVP & Head of Wealth Management – HSBC Indonesia (2011 – 2019)
- Director, Retail Banking Head – Citibank Indonesia (2019 - 2023)
- Senior Executive Vice President Wealth Management (2023 – present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.



BUN HENDRA

SEVP Credit Risk
Act. SEVP Remedial Recovery

Age
47 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor of Engineering Degree from University of Tarumanagara, bachelor degree, (1995-1999)
- Master of Management, University of Indonesia, post-graduate degree, (2001-2003)
- Level 7 Risk Management Competency by the Risk Management Certification Agency (BSMR) (2024)

Position History:
Legal Basis of Appointment as the Company's SEVP
- Appointed as SEVP Credit Risk based on PT Bank Negara Indonesia (Persero) Tbk Board of Directors Decision No. KP/743/DIR/R dated October 25, 2023.
- Appointed as Temporary SEVP Remedial Recovery based on Board of Directors Decision of PT Bank Negara Indonesia (Persero) Tbk. No. KP/093.1/DIR/R dated March 14, 2024.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- SVP and Credit Review Division Co Head - PT Bank Ekonomi Rahardja Tbk. (2010 – 2013)
- Director, Head of Research & Analysis, Indonesia – PT ANZ Indonesia (2014 – 2016)
- Executive Vice President, Global Corporate Credit Head - PT Bank CIMB Niaga Tbk (2016-2019)
- Executive Director, Head of Credit Risk Specialist - PT Bank DBS Indonesia (2019 – 2023)
- Senior executive Vice President Credit Risk – PT Bank Negara Indonesia (Persero) (2023 – present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.



PANCARAN AFFENDI

SEVP Corporate Banking

Age
51 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Organizational Leadership - IMD Business School (2014)
- Civil Engineering - Universitas Tarumanegara (1997)
- Level 7 Risk Management Competency by the Risk Management Certification Agency (BSMR) (2024)

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Corporate Banking based on PT Bank Negara Indonesia (Persero) Tbk Board of Directors Decision No. KP/742/DIR/R dated October 25, 2023.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions
Komisaris BNI Sekuritas (2024)(saat ini dalam proses Fit & Proper Test OJK).

Work Experience
- Civil Structural Designer, PT Partono Fondas (1997 – 1998)
- Corporate Banking, PT Bank Central Asia Tbk (1998 – 2004)
- Corporate Banking, DBS Bank (2004 – 2005)
- VP – Corporate Banking, ABN AMRO Bank N.V (2005 –2008)
- Managing Director – Country Head of Global Corporate & Institutional Banking, MUFG Bank (2008 -2023)
- SEVP Corporate Banking, PT Bank Negara Indonesia (Persero), Tbk (2023 – present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.



ANANG BASUKI
SEVP Operations

Age
54 years old as of December 31, 2023

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
- Bachelor's degree in Accounting from Universitas Gadjah Mada
- Risk Management Competency Qualification Level 6 by the Banking Professional Certification Institute (LSPP) (2024)

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Operations dengan pola Pelaksana Jabatan (PJ) based on PT Bank Negara Indonesia (Persero) Tbk Board of Directors Decision No. KP/820/DIR/R dated December 06, 2023 and active as SEVP Operations with effect from March 01, 2024.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Department Head, Audit Methodology PT Bank Negara Indonesia (Persero) Tbk (2005–2008)
- Branch Manager, Malang & Mojokerto PT Bank Negara Indonesia (Persero) Tbk (2008–2010)
- Deputy General Manager, Corporate Audit PT Bank Negara Indonesia (Persero) Tbk (2010–2014)
- CEO Region 02 (Sumatra Barat, Riau, Kepri) PT Bank Negara Indonesia (Persero) Tbk (2013–2014)
- Chief Audit Executive PT Bank Negara Indonesia (Persero) Tbk (2014–2016)
- General Manager, Credit Operation PT Bank Negara Indonesia (Persero) Tbk (2016–2019)
- Chief Learning Officer, BNI Corporate University PT Bank Negara Indonesia (Persero) Tbk (2019–2021)
- Chief Audit Executive 2nd PT Bank Negara Indonesia (Persero) Tbk (2021–2024)
- Senior Executive Vice President Operations PT Bank Negara Indonesia (Persero) Tbk.



EMMY NURHAYATI
SEVP Human Capital

Age
60 years old as of December 31, 2024

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Education and/or Certification
Bachelor's degree in Economy from Universitas Indonesia

Position History:
Legal Basis of Appointment as the Company's SEVP
Appointed as SEVP Human Capital based on PT Bank Negara Indonesia (Persero) Tbk Board of Directors Decision No. KP/429/DIR/R dated October 01, 2024.

Concurrent Positions
BNI
No concurrent positions at BNI.

Others Public Companies
Does not hold concurrent positions in other public companies.

Other Institutions:
Does not hold concurrent positions, whether as a member of the Board of Directors, member of the Board of Commissioners, or other positions.

Work Experience
- Assistant Vice President Penanganan Non Performing Loan (NPL) - PT Bank Mandiri (Persero) Tbk (2010-2011)
- Vice President Human Capital Business Partner Wholesale Banking - PT Bank Mandiri (Persero) Tbk (2011-2014)
- Senior Vice President Human Capital Business Partner Wholesale Banking - PT Bank Mandiri (Persero) Tbk (2015-2019)
- Senior Vice President Human Capital Performance and Remuneration – PT Bank Mandiri (Persero) Tbk (2019-2020)
- President Commissioner – Koperasi Pegawai PT Bank Mandiri (Persero) Tbk (2019-2021)
- SVP Business Partner – PT Bank Negara Indonesia (Persero) Tbk (2021-2023)
- Human Capital Business Partner Head - PT Bank Negara Indonesia (Persero) Tbk (2023-2024)
- Senior Executive Vice President Human Capital - PT Bank Negara Indonesia (Persero) Tbk (2024-present)

Affiliated Relationships
No affiliations with members of the Board of Directors and Board of Commissioners, or with the majority and controlling shareholder.

Training in 2024
Data can be found in the Senior Executive Vice President (SEVP) Competency Development section in the Company Profile chapter of this Annual Report.

Executive Officers Profiles

HEADS OF DIVISIONS IN THE MAIN DIRECTORATE



Johansyah
Internal Audit Head

43 years old as of December 31, 2024. Holds a Master's degree in Notary Public from Jayabaya University. Appointed as Head of Internal Audit Division based on Board of Directors' Decree No. KP/104/DIR/R dated March 18, 2024.



Okki Rushartomo
Corporate Secretary Division Head

44 years old as of December 31, 2024. Holds a Bachelor's degree in Industrial Engineering from Institut Teknologi Bandung. Appointed as Division Head – Communication & Corporate Secretary Division based on Board of Directors' Decree No. KP/367/DIR/R dated September 19, 2022 and change of unit name to Corporate Secretary Division based on Board of Directors' Decree No. KP/208/DIR/R dated May 31, 2023.

HEADS OF DIVISION IN THE DEPUTY DIRECTORATE



Ikhwani Fauzana
Pension Fund Division Head

44 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Gadjah Mada. Appointed as Head of Pension Fund Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.

HEADS OF DIVISIONS IN THE WHOLESALE & INTERNATIONAL BANKING DIRECTORATE



Andrean Palonggam
Corporate Banking 1 Division Head

41 years old as of December 31, 2024. Holds a Bachelor's degree in Management from Universitas Katolik Atma Jaya. Appointed as Head of Corporate Banking 1 Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Ditya Maharhani Harninda
Corporate Banking 2 Division Head

43 years old as of December 31, 2024. Holds a Master's degree in Marketing from the University of New South Wales. Appointed as Head of Corporate Banking 2 Division based on Board of Directors' Decree No. KP/327/DIR/R dated June 22, 2023.



Dipo Nugroho
Corporate Banking 3 Division Head

42 years old as of December 31, 2024. Holds a Master's degree in Master of Business Administration from Erasmus University Rotterdam. Appointed as Head of Corporate Banking 3 Division based on Board of Directors' Decree No. KP/328/DIR/R dated June 22, 2023.



Arief Wibawa
Corporate Banking 4 Division Head

46 years old as of December 31, 2024. Holds a Bachelor's degree in Industrial Engineering from Universitas Telkom. Appointed as Head of Corporate Banking 4 Division based on Board of Directors' Decree No. KP/244/DIR/R dated June 12, 2023.



Rima Cahyani
International & Financial Institutions Division Head

42 years old as of December 31, 2024. Holds a Bachelor's degree in International Relations from Universitas Gadjah Mada. Appointed as Head of International & Financial Institutions Division based on Board of Directors' Decree No. KP/860/HCE/1/R dated May 13, 2024.



Rini Yuniar
Syndication & Structured Finance Division Head

53 years old as of December 31, 2024. Holds a Master's degree in Internal Auditing from Universitas Gadjah Mada. Appointed as Head of Syndication & Structured Finance Division based on Board of Directors' Decree No. No. KP/820/DIR/R dated December 6, 2023.



Nyimas Sulistia Sriwulandari
SORX Wholesale & International Banking

36 years old as of December 31, 2024. Holds a Bachelor's degree in Management from Universitas Indonesia. Appointed as Senior Operational Risk Executive (SORX) Wholesale & International Banking based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Hariadi Hendrawan
Treasury Division Head

41 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Diponegoro. Appointed as Head of Treasury Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Amalia Savitri
SBX Corporate Banking

47 years old as of December 31, 2024. Holds a Master's degree in Financial Management from Universitas Indonesia. Appointed as Senior Business Executive (SBX) based on Board of Directors' Decree No. KP/591/DIR/R dated July 10, 2023.



Mochamad Roland Perdana
SBX Corporate Banking

40 years old as of December 31, 2024. Holds a Doctoral degree in Management from Universitas Brawijaya. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/200/DIR/R dated May 27, 2024.

HEADS OF DIVISIONS IN THE ENTERPRISE & COMMERCIAL BANKING DIRECTORATE



Yogi Bima Sakti
Enterprise Banking Division Head

48 years old as of December 31, 2024. Holds a Bachelor's degree in Management from Edith Cowan University. Appointed as Head of Enterprise Banking Division based on Board of Directors' Decree No. KP/123/DIR/R dated March 24, 2023.



I Dewa Gde Ngurah Yoga Pratama
Commercial Banking 1 Division Head

45 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Katolik Indonesia Atma Jaya. Appointed as Head of Commercial Banking 1 Division based on Board of Directors' Decree No. KP/595/DIR/R dated July 16, 2023.



Muh. Evan Zulkarnaen
Temporary Head of Commercial Banking 2 Division

54 years old as of December 31, 2024. Holds a Master's degree in Small Medium Industry from Institut Pertanian Bogor. Appointed as Temporary Head of Commercial Banking 2 Division based on Board of Directors' Decree No. KP/325/DIR/R dated July 26, 2024.



Martinus Matondang
SBX Enterprise Banking

53 years old as of December 31, 2024. Holds a Bachelor's degree in Development from Universitas Bung Hatta. Appointed as Senior Business Executive (SBX) based on Board of Directors' Decree No. KP/607/DIR/R dated July 21, 2023.



Mahrauza Purnaditya
SBX Enterprise Banking

54 years old as of December 31, 2024. Holds a Master's degree in Agribusiness from Institut Pertanian Bogor. Appointed as Senior Business Executive (SBX) based on Board of Directors' Decree No. KP/466/DIR/R dated October 22, 2024.



Ridwan Resmana
SBX Enterprise Banking

52 years old as of December 31, 2024. Holds a Bachelor's degree in Accounting from Universitas Siliwangi. Appointed as Senior Business Executive (SBX) based on Board of Directors' Decree No. KP/200/DIR/R dated May 27, 2024.



Eben Eser Nainggolan
SBX Enterprise Banking

55 years old as of December 31, 2024. Holds a Master's degree in Small Medium Industry from Institut Pertanian Bogor. Appointed as Senior Business Executive (SBX) based on Board of Directors' Decree No. KP/312/DIR/R dated July 17, 2024.



Warda Nadjamuddin
SBX Commercial Banking

53 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Sam Ratulangi. Appointed as Senior Business Executive based on Board of Directors' Decree No. KP/403/DIR/R dated June 27, 2023.

HEADS OF DIVISIONS IN THE INSTITUTIONAL BANKING DIRECTORATE



Iwan Ariawan
Institutional Banking 1 Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Financial Management from Universitas Riau. Appointed as Head of Institutional Banking 1 Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Efrizal
Institutional Banking 2 Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Marketing Management from Universitas Negeri Padang. Appointed as Head of Institutional Banking 2 Division based on Board of Directors' Decree No. KP/219/DIR/R dated June 5, 2023.

HEADS OF DIVISIONS IN THE DIGITAL & INTEGRATED TRANSACTION BANKING DIRECTORATE



I Gede Widya Anantayoga
Wholesale Transaction Product & Partnership Division Head

44 years old as of December 31, 2024. Holds a Master's degree in Management and Business from Institut Pertanian Bogor. Appointed as Head of Wholesale Transaction Product & Partnership Division based on Board of Directors' Decree No. KP/051/DIR/R dated February 1, 2024.



Efransyah Mudani
Wholesale Digital Channel Division Head

42 years old as of December 31, 2024. Holds a Bachelor's degree in Material Engineering from Institut Teknologi Bandung. Appointed as Head of Wholesale Digital Channel Division based on Board of Directors' Decree No. KP/163/DIR/R dated April 26, 2024.



R. Pratama Prabawaputra
Corporate Development & Transformation Division Head

37 years old as of December 31, 2024. Holds a Master's degree in Master of Business Administration from the University of Birmingham. Appointed as Head of Corporate Development & Transformation Division based on Board of Directors' Decree No. KP/040/DIR/R dated January 29, 2024.



Mesah Roni Ginting
Retail Digital Product & Partnership Division Head

43 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Gadjah Mada, Yogyakarta. Appointed as Head of Retail Digital Product & Partnership Division based on Board of Directors' Decree No. KP/372/DIR/R dated June 23, 2023.



Indra Gunawan
Retail Digital Channel Division Head

43 years old as of December 31, 2024. Holds a Bachelor's degree in Computer Sciences from the University of Texas. Appointed as Head of Retail Digital Channel Division based on Decree No. KP/062/DIR/R dated February 19, 2024.



Duardi Prihandiko
Marketing Communications Division Head

45 years old as of December 31, 2024. Holds a Bachelor's degree in Communication from Universitas Padjadjaran. Appointed as Head of Marketing Communications Division based on Board of Directors' Decree No. HCE/1/0203/R dated March 8, 2024.

HEADS OF DIVISIONS IN THE NETWORK & SERVICES DIRECTORATE



Beby Lolita Indriani
Distribution Network & Sales Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Padjadjaran. Appointed as Head of Distribution Network & Sales Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Rahma Dhoni
Agen46 Division Head

47 years old as of December 31, 2024. Holds a Master's degree in Management Science from the Universitas Indonesia. Appointed as Head of Agen46 Division based on Board of Directors' Decree No. KP/153/DIR/R dated May 03, 2023.



Rahmat Pertinda
Customer Experience Center Division Head

52 years old as of December 31, 2024. Holds a Master's degree in Law from Universitas Trisakti. Appointed as Head of Customer Experience Center Division based on Board of Directors' Decree No. KP/212/DIR/R dated May 31, 2023.



Suryo Utomo
SORX Network & Services

52 years old as of December 31, 2024. Holds a Master's degree in Accounting from Universitas Diponegoro. Appointed as Senior Operational Risk Executive (SORX) Network & Services based on Board of Directors' Decree No. KP/595/DIR/R dated July 14, 2023.

HEADS OF DIVISIONS IN THE HUMAN CAPITAL & COMPLIANCE DIRECTORATE



Yenni Sari Dewi
Human Capital Strategy Division Head

46 years old as of December 31, 2024. Holds a Master's degree in General Business from Universitas Gadjah Mada. Appointed as Head of Human Capital Strategy Division based on Board of Directors' Decree No. KP/123/DIR/R dated June 13, 2023.



Afthon Shodaq Noor
Human Capital Services Division Head

53 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Head of Human Capital Services Division based on Board of Directors' Decree No. KP/259/DIR/R dated June 13, 2023.



Dandy P. Sjamsudin
BNI University Division Head

53 years old as of December 31, 2024. Holds a Master's degree in Finance/Banking from the University of Monash. Appointed as Head of BNI University Division based on Board of Directors' Decree No. KP/261/DIR/R dated June 19, 2023.



Ikhsan Azman
Compliance Division Head

55 years old as of December 31, 2024. Holds a Master's degree in Agribusiness Management from Institut Pertanian Bogor. Appointed as Head of Compliance Division based on Board of Directors' Decree No. KP/595/DIR/R dated July 14, 2023.



Sandy Dwinanto
Legal Division Head

51 years old as of December 31, 2024. Holds a Master's degree in Risk Management from Universitas Indonesia. Appointed as Head of Legal Division based on Board of Directors' Decree No. KP/257/DIR/R dated June 13, 2023.



Hendra Susila
Policy Governance Division Head

45 years old as of December 31, 2024. Holds a Master's degree in Financial Management from Universitas Putra Indonesia YPTK Padang. Appointed as Head of Policy Governance Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Efita Praharani
Human Capital Business Partner Head

57 years old as of December 31, 2024. Holds a Master's degree in Administrative Sciences from Universitas Indonesia. Appointed as Head of Human Capital Business Partner based on Board of Directors' Decree No. KP/252/DIR/R dated June 13, 2023.



Muhammad Fadli
Temporary
Human Capital Business Partner Head

40 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Bina Nusantara. Appointed as Temporary Head of Human Capital Business Partner Head based on Board of Directors' Decree No. KP/567/DIR/R dated December 19, 2024.

HEADS OF DIVISIONS IN THE FINANCE DIRECTORATE



Aldi Advianto Baskara
Corporate Planning & Performance Management Division Head

39 years old as of December 31, 2024. Holds a Master's degree in Business Administration from the University of Birmingham. Appointed as Head of Corporate Planning & Performance Management Division based on Board of Directors' Decree No. KP/200/DIR/R dated May 27, 2024.



Setyo Susilo
Accounting Division Head

52 years old as of December 31, 2024. Holds a Master's degree in Small and Medium Industry from Institut Pertanian Bogor. Appointed as Head of Accounting Division based on Board of Directors' Decree No. KP/688/DIR/R dated September 26, 2023.



Made Dany Pratiwi B.
Procurement & Fixed Assets Division Head

53 years old as of December 31, 2024. Holds a Master's degree in Actuarial from Universitas Indonesia. Appointed as Head of Procurement & Fixed Assets Division based on Board of Directors' Decree No. KP/233/DIR/R dated June 06, 2023.



Yohan Setio
Investor Relations Division Head

39 years old as of December 31, 2024. Holds a Master of Business Administration (MBA) from the University of University of Cambridge, UK, England. Appointed as Head of Investor Relations Division based on Board of Directors' Decree No. KP/229/DIR dated June 6, 2023.



M. Emil Azhary
Subsidiaries Management Division Head

46 years old as of December 31, 2024. Holds a Master's degree in Business Administration from North Eastern University. Appointed as Head of Subsidiaries Management Division based on Board of Directors' Decree No. KP/237/DIR/R dated June 06, 2023.



Leo Putera Rinaldy
Office of Chief Economist

41 years old as of December 31, 2024. Holds a Bachelor's degree in Economics from the University of Indonesia. Appointed as Chief Economist based on Board of Directors' Decree No. KP/755/DIR/R dated October 31, 2023.



Billie Setiawan
Data Management & Analytics Division Head

43 years old as of December 31, 2024. Holds a Bachelor's degree in Science from the University of Greenwich. Appointed as Head of Data Management & Analytics Division based on Board of Directors' Decree No. KP/245/DIR/R dated June 12, 2023.

HEADS OF DIVISIONS IN THE RETAIL BANKING DIRECTORATE



Sri Indira
Consumer Segment Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Gadjah Mada. Appointed as Head of Consumer Segment Division based on Board of Directors' Decree No. KP/270/DIR/R dated June 14, 2023.



Febrian Sugiharta
Consumer Product Division Head

44 years old as of December 31, 2024. Holds a Bachelor's degree in Agribusiness from the Institut Pertanian Bogor. Appointed as Head of Consumer Product Division based on Board of Directors' Decree No. KP/211/DIR/R dated May 31, 2024.



Grace Situmeang
Card Business Division Head

51 years old as of December 31, 2024. Holds a Bachelor's degree in International Relations from Universitas Indonesia. Appointed as Head of Card Business Division based on Board of Directors' Decree No. KP/263/DIR/R dated June 14, 2023.



I Nyoman Astiawan
Retail Productive Banking Division Head

54 years old as of December 31, 2024. Holds a Bachelor's degree in Management from Universitas Brawijaya. Appointed as Head of Retail Productive Banking Division based on Board of Directors' Decree No. KP/466/DIR/R dated October 22, 2024.



Sunarna Eka Nugraha
Business Program Division Head

56 years old as of December 31, 2024. Holds a Bachelor's degree in Fisheries from Universitas Diponegoro. Appointed as Head of Business Program Division based on Decree No. DIR/214/R dated December 9, 2024.



Henny Woe
Wealth Management Division Head

49 years old as of December 31, 2024. Holds a Bachelor's degree in Accounting from Universitas Tarumanagara. Appointed as Head of Wealth Management Division based on Board of Directors' Decree No. KP/267/DIR/R dated June 14, 2023.



Putu Bagus Kresna
SORX Consumer Banking & Corporate Function

52 years old as of December 31, 2024. Holds a Master's degree in Financial Management from the Universitas Indonesia. Appointed as Senior Operational Risk Executive (SORX) Consumer Banking & Corporate Function based on Board of Directors' Decree No. KP/244/DIR/R dated June 12, 2023.

HEADS OF DIVISIONS IN THE RISK MANAGEMENT DIRECTORATE



Rayendra Minarsa Goenawan
Enterprise Risk Management Division Head

40 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Bina Nusantara. Appointed as Head of Enterprise Risk Management Division based on Board of Directors' Decree No. KP/289/DIR/R dated June 16, 2023.



Adi Surya Djoko
Operational Risk Management Division Head

47 years old as of December 31, 2024. Holds a Master's degree in Master of Business from the University of Western Australia. Appointed as Head of Operational Risk Management Division based on Board of Directors' Decree No. KP/878/DIR/R dated December 28, 2023.



Made Nariswari
Retail Credit Risk Division Head

50 years old as of December 31, 2024. Holds a Bachelor's degree in Economics from Universitas Indonesia. Appointed as Head of Retail Credit Risk Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 06, 2023.



Wilhelmus Max Charles
Anti Fraud Head

49 years old as of December 31, 2024. Holds a Bachelor's degree in Management from Universitas Gunadarma. Appointed as Head of Anti Fraud Division based on Board of Directors' Decree No. KP/290/DIR/R dated June 16, 2023.



Aryani Dwi Satiti
Corporate & Enterprise Credit Risk Division Head

52 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Head of Corporate & Enterprise Credit Risk Division based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Ujuan Marihot H. P.
Corporate Remedial & Recovery Division Head

49 years old as of December 31, 2024. Holds a Master's degree in Civil Engineering from University of Wolverhamton and Master's degree in Management from Universitas Indonesia. Appointed as Head of Corporate Remedial & Recovery Division based on Board of Directors' Directors' Decree No. KP/123/DIR/R dated April 2, 2024.



Yessy Kurnia Dyah W.
Commercial Credit Risk Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Agribusiness Management from Universitas Pembangunan Nasional Veteran. Appointed as Head of Commercial Credit Risk Divison based on Board of Directors' Decree No. KP/123/DIR/R dated April 2, 2024.



Saridatun
Enterprise & Commercial Remedial & Recovery Division Head

52 years old as of December 31, 2024. Holds a Master's degree in Management Accounting from Universitas Gadjah Mada. Appointed as Head of Enterprise & Commercial Remedial & Recovery Division based on Board of Directors' Decree No. KP/312/DIR/R dated July 17, 2024.



Hari Satriyono
Retail Collection & Recovery Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Head of Retail Collection & Recovery Divison based on Board of Directors' Decree No. KP/286.3/DIR/R dated June 16, 2023.



Muhammad Jufri
SCX Corporate & Enterprise Credit Risk

55 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Trisakti. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/123/DIR/R dated April 2, 2024.



Yanar Siswanto
SCX Corporate & Enterprise Credit Risk

55 years old as of December 31, 2024. Holds a Master's degree in Agribusiness from Institut Pertanian Bogor. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/408/DIR/R dated June 27, 2023.



Agus Sutanto
SCX Corporate & Enterprise Credit Risk

46 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Indonesia. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/409/DIR/R dated June 27, 2023.



Renosari
SCX Commercial Credit Risk

51 years old as of December 31, 2024. Holds a Master's degree in Banking and Financial Law from Boston University and Master's degree in Economic Law from Universitas Indonesia. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/466/DIR/R dated October 22, 2024.



Julius D. Aritonang
SCX Commercial Credit Risk

53 years old as of December 31, 2024. Holds a Master's degree in Finance and Banking Management from Universitas Indonesia. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/466/DIR/R dated October 22, 2024.



Eko Setiawan
SCX Commercial Credit Risk

54 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/410/DIR/R dated June 27, 2023.



Bernardus
SCX Commercial Credit Risk

54 years old as of December 31, 2024. Holds a Master's degree in Accounting Management from Universitas Gadjah Mada. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/412/DIR/R dated June 27, 2023.



Badriansyah
SCX Commercial Credit Risk

55 years old as of December 31, 2024. Holds a Bachelor's degree in Accounting from Universitas Padjadjaran. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/591/DIR/R dated July 10, 2023.



Retna Mumpuni
SCX Commercial Credit Risk

53 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/591/DIR/R dated July 10, 2023.



Wirawan Ari Rachmana
SCX Commercial Credit Risk

51 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Diponegoro. Appointed as Senior Credit Risk Executive (SCX) based on Board of Directors' Decree No. KP/466/DIR/R dated October 22, 2024.

HEADS OF DIVISIONS IN THE TECHNOLOGY & OPERATIONS DIRECTORATE



Ari Pratiwi
IT Strategy & Architecture Division Head

51 years old as of December 31, 2024. Holds a Doctorate degree in Economics from Universitas Trisakti. Appointed as Head of IT Strategy & Architecture Division based on Board of Directors' Decree No. KP/377/DIR/R dated June 26, 2023.



Herry Setiadi Munawir
Banking Operations Division Head and Temporary Operations Strategy & Development Division Head

43 years old as of December 31, 2024. Holds a Bachelor's degree in Accounting from Universitas Klabat. Appointed as Head of Banking Operations Division based on Board of Directors' Decree No. KP/001/DIR/R dated May 15, 2023. Concurrently, he acts as Temporary Head of Operations Strategy & Development Division based on Board of Directors' Decree No. KP/247/DIR/R dated June 12, 2023.



Sonny Setiadi
IT Infrastructure Management Division Head and Temporary Chief Information Security Officer Division Head

52 years old as of December 31, 2024. Holds a Master's degree in Banking from Institut Keuangan Perbankan dan Informatika Asia Perbanas Jakarta. Appointed as Head of IT Infrastructure Management Division based on Board of Directors' Decree No. KP/380/DIR/R dated June 26, 2023. Concurrently, he acts as Temporary Head of Chief Information Security Officer Division based on Board of Directors' No. KP/085/DIR/R dated March 05, 2024.



Heri Atmoko
Retail Digital Delivery Division Head

46 years old as of December 31, 2024. Holds a Master's degree in Information Systems Management from Universitas Budi Luhur, Jakarta. Appointed as Head of Retail Digital Delivery Division based on Board of Directors' Decree No. KP/379/DIR/R dated June 26, 2023.



Alfonso Tambunan
Wholesale Digital Delivery Division Head

51 years old as of December 31, 2024. Holds a Bachelor's degree in Business Administration from The Ohio State University. Appointed as Head of Retail Digital Delivery Division based on Board of Directors' Decree No. KP/1652/HCE/1/R dated September 27, 2024.



Nugroho Gito Prasodjo
Temporary Head of IT Application Services Division

46 years old as of December 31, 2024. Holds a Master's degree in Computer Science from Universitas Indonesia. Appointed as Temporary Head of IT Application Services Division based on Board of Directors' Decree No. KP/084/DIR/R dated March 1, 2024.



Setiawan Anis Widjojo
Application Development Division Head

53 years old as of December 31, 2024. Holds a Master's degree in Internal Auditing from Universitas Gadjah Mada. Appointed as Head of Application Development Division based on Board of Directors' Decree No. KP/378/DIR/R dated June 26, 2023.



Muhammad Gunawan Putra
Digital Operations Division Head

54 years old as of December 31, 2024. Holds a Master's degree in Strategic Management from Universitas Gadjah Mada. Appointed as Head of Digital Operations Division based on SEVP Decree No. KP/002/SEVP/R dated May 15, 2023.



Erisman
Temporary
Credit Operations Division Head

54 years old as of December 31, 2024. Holds a Bachelor's degree in Agricultural Engineering from Institut Pertanian Bogor. Appointed as Temporary Head of Credit Operations Division based on Board of Directors Decree No. KP/576/DIR/R dated December 20, 2024.



Munajat
SORX Technology Digital & Operations

52 years old as of December 31, 2024. Holds a Bachelor's degree in Finance and Banking Management from STIE Perbanas. Appointed as Senior Operational Risk Executive (SORX) Technology Digital & Operations based on Board of Directors' Decree No. KP/480/DIR/R dated October 31, 2024.

REGIONAL MANAGER



Rustianto
Regional CEO of Regional Office 01

53 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Sebelas Maret. Appointed as Regional CEO of Regional Office 01 based on Board of Directors' Decree No. KP/634/DIR/R dated August 16, 2023.



Khairul Salam
Regional CEO of Regional Office 02

51 years old as of December 31, 2024. Holds a Bachelor's degree in Information Management from STMIK YPTK Padang. Appointed as Regional CEO of Regional Office 02 based on Board of Directors' Decree No. KP/284.2/DIR/R dated June 15, 2023.



ZamZami
Regional CEO of Regional Office 03

54 years old as of December 31, 2024. Holds a Master's degree in Management from STIM LPMI. Appointed as Regional CEO of Regional Office 03 based on Board of Directors' Decree No. KP/312/DIR/R dated July 17, 2024.



Roy Wahyu Maulana
Regional CEO of Regional Office 04

54 years old as of December 31, 2024. Holds a Bachelor's degree in Economics from Universitas Kristen Indonesia. Appointed as Regional CEO of Regional Office 04 based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



I Gst. Nym. Dharma Putra
Regional CEO of Regional Office 05

53 years old as of December 31, 2024. Holds a Doctorate degree in Management from Religious and Cultural Sciences from Universitas Hindu Indonesia. Appointed as Regional CEO of Regional Office 05 based on Board of Directors' Decree No. KP/284.5/DIR/R dated June 15, 2023.



Maya Agustina
Regional CEO of Regional Office 06

51 years old as of December 31, 2024. Holds a Bachelor's degree in Agricultural and Resource Economics from Institut Pertanian Bogor. Appointed as Regional CEO of Regional Office 06 based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Muhammad Arafat
Regional CEO of Regional Office 07

54 years old as of December 31, 2024. Holds a Master's degree in Financial Management from Universitas Hasanuddin. Appointed as Regional CEO of Regional Office 07 based on Board of Directors' Decree No. KP/284.7/DIR/R dated June 15, 2023.



Komang Arya Wira Kusuma Atmaja
Regional CEO of Regional Office 08

46 years old as of December 31, 2024. Holds a Bachelor's degree in Industrial Engineering and Management from Institut Teknologi Nasional Malang. Appointed as Regional CEO of Regional Office 08 based on Board of Directors' Decree No. KP/312/DIR/R dated July 17, 2024.



Andy Yusdiman
Regional CEO of Regional Office 09

52 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Regional CEO of Regional Office 09 based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Anak Agung Agustiya Novitayanti
Regional CEO of Regional Office 10

44 years old as of December 31, 2024. Holds a Master's degree in Development Economics from Universitas Udayana. Appointed as Regional CEO of Regional Office 10 based on Board of Directors' Decree No. KP/312/DIR/R dated July 17, 2024.



Lodewyck Z.S. Pattihahuan
Regional CEO of Regional Office 11

55 years old as of December 31, 2024. Holds a Master's degree in Management from Institute Bisnis Nusantara. Appointed as Regional CEO of Regional Office 11 based on Board of Directors' Decree No. KP/284.10/DIR/R dated June 15, 2023.



Rudy Sihombing
Regional CEO of Regional Office 12

52 years old as of December 31, 2024. Holds a Master's degree in Business Administration from the University of Saint Louis. Appointed as Regional CEO of Regional Office 12 based on Board of Directors' Decree No. KP/312/DIR/R dated July 17, 2024.



Faizal Arief Setiawan
Regional CEO of Regional Office 14

54 years old as of December 31, 2024. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Regional CEO of Regional Office 14 based on Board of Directors' Decree No. KP/284.12/DIR/R dated June 15, 2023.



Koko Prawira Butar Butar
Regional CEO of Regional Office 15

44 years old as of December 31, 2024. Holds a Master's degree in Development Economics from Universitas Sumatera Utara. Appointed as Regional CEO of Regional Office 15 based on Board of Directors' Decree No. KP/284.13/DIR/R dated June 15, 2023.



Soesetyo Priharjanto
Regional CEO of Regional Office 16

51 years old as of December 31, 2024. Holds a Master's degree in in Small and Medium Industry from Bogor Agricultural University. Appointed as Regional CEO of Regional Office 15 based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Ariyanto Soewondo Geni
Regional CEO of Regional Office 17

54 years old as of December 31, 2024. Holds a Master's degree in Law from Universitas Indonesia. Appointed as Regional CEO of Regional Office 17 based on Board of Directors' Decree No. KP/820/DIR/R dated December 6, 2023.



Muhamad Jauhary
Regional CEO of Regional Office 18

48 years old as of December 31, 2024. Holds a Master's degree in Management from the University of Ateneo De Manila Philippines. Appointed as Regional CEO of Regional Office 18 based on Board of Directors' Decree No. KP/634/DIR/R dated August 16, 2023.

HEADS OF THE OVERSEAS OFFICES



Edy Pramono
Seoul Overseas Branch
General Manager

43 years old as of December 31, 2024. Holds a Bachelor's degree in Economics in Management from Universitas Indonesia. Appointed as Seoul Overseas Branch General Manager based on Decree No. KP/0097/INT/1/R dated December 14, 2023.



Yudhi Zufrial
Tokyo Overseas Branch
General Manager

55 years old as of December 31, 2024. Holds a Master's degree in Agribusiness Management from Institut Pertanian Bogor. Appointed Tokyo Overseas Branch General Manager based on Decree KP/0093/INT/1/R dated December 14, 2023.



Farid Faraitody
Hong Kong Overseas Branch
General Manager

46 years old as of December 31, 2024. Holds a Bachelor's degree in International Relations from Universitas Jember. Appointed as Hong Kong Overseas Branch General Manager based on Decree No. KP/0087/INT/1/R dated December 14, 2023.



Roekma Hari Adji
London Overseas Branch
General Manager

54 years old as of December 31, 2024. Holds a Master's degree in Management from Universitas Pancasila. Appointed as London Overseas Branch General Manager based on Decree No. KP/101/INT/1/R dated December 14, 2023.



Olivia Irine Sandra
Temporary
New York Overseas Branch
General Manager

42 years old as of December 31, 2024. Holds a Master's degree in Management from University of Nottingham. Appointed Temporary as New York Overseas Branch General Manager based on Decree No. KP/401/DIR/R dated September 11, 2024.



Laika Saputra Rudianto
Singapore Overseas Branch
General Manager

51 years old as of December 31, 2024. Holds a Master's degree from Columbia University. Appointed as Singapore Overseas Branch General Manager based on Decree No. KP/0076/INT/1/R dated December 14, 2023.



Dwi Putranto Cahyo Wibowo

Head of Amsterdam Representative Office

39 years old as of December 31, 2024. Holds a Master of Science degree in Finance and Business Economics from Manchester Business School, the University of Manchester. Appointed as Head of Amsterdam Representative Office based on Decree No. KP/108/INT/1/R dated December 14, 2023.



Rendy Tjahjana

Head of Sydney Representative Office

43 years old as of December 31, 2024. Holds a Magister in Science degree in Analytics from Colombia University and Master's Degree in Business Administration from Melbourne Business School, University of Melbourne. Appointed as Head of Sydney Representative Office based on Decree No. INT/1/251/R dated August 12, 2024.

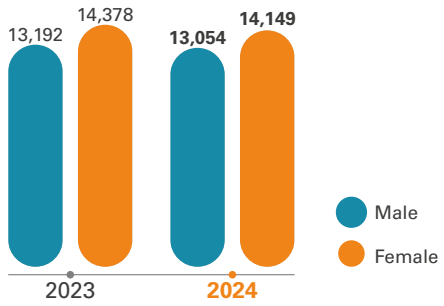
Employee Demographics

In 2024, the number of BNI employees reached 27,203 people, a decrease of 367 people, or 1.33% compared to 27,570 employees as of December 31, 2023. In detail, information regarding the demographics of BNI employees based on gender, position level, age, education level, and employment status (permanent/ contract) in financial year 2024 and its comparison with financial year 2023 is as follows:

Total Employees based on Gender

(people)

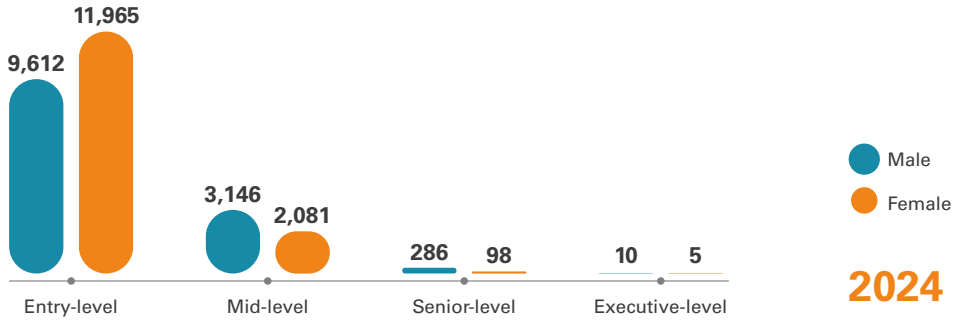
Gender	2024	2023
Male	13,054	13,192
Female	14,149	14,378
Total	**27,203**	**27,570**

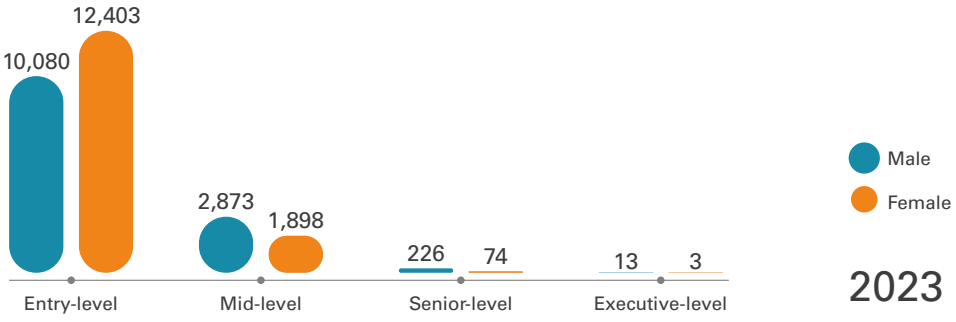


Total Employees based on Position Level

(people)

Position Level	2024				2023			
	Male		Female		Male		Female	
	Total Employee	Employee Percentage (%)	Total Employee	Employee Percentage (%)	Total Employee	Employee Percentage (%)	Total Employee	Employee Percentage (%)
Entry-level	9,612	35.3	11,965	44	10,080	36.6	12,403	45.0
Mid-level	3,146	11.6	2,081	7.6	2,873	10.4	1,898	6.9
Senior-level	286	1.1	98	0.4	226	0.8	74	0.3
Executive-level	10	0.0	5	0.0	13	0.0	3	0.0
Total Employee	**13,054**	**48.0**	**14,149**	**52.0**	**13,192**	**47.8**	**14,378**	**52.2**



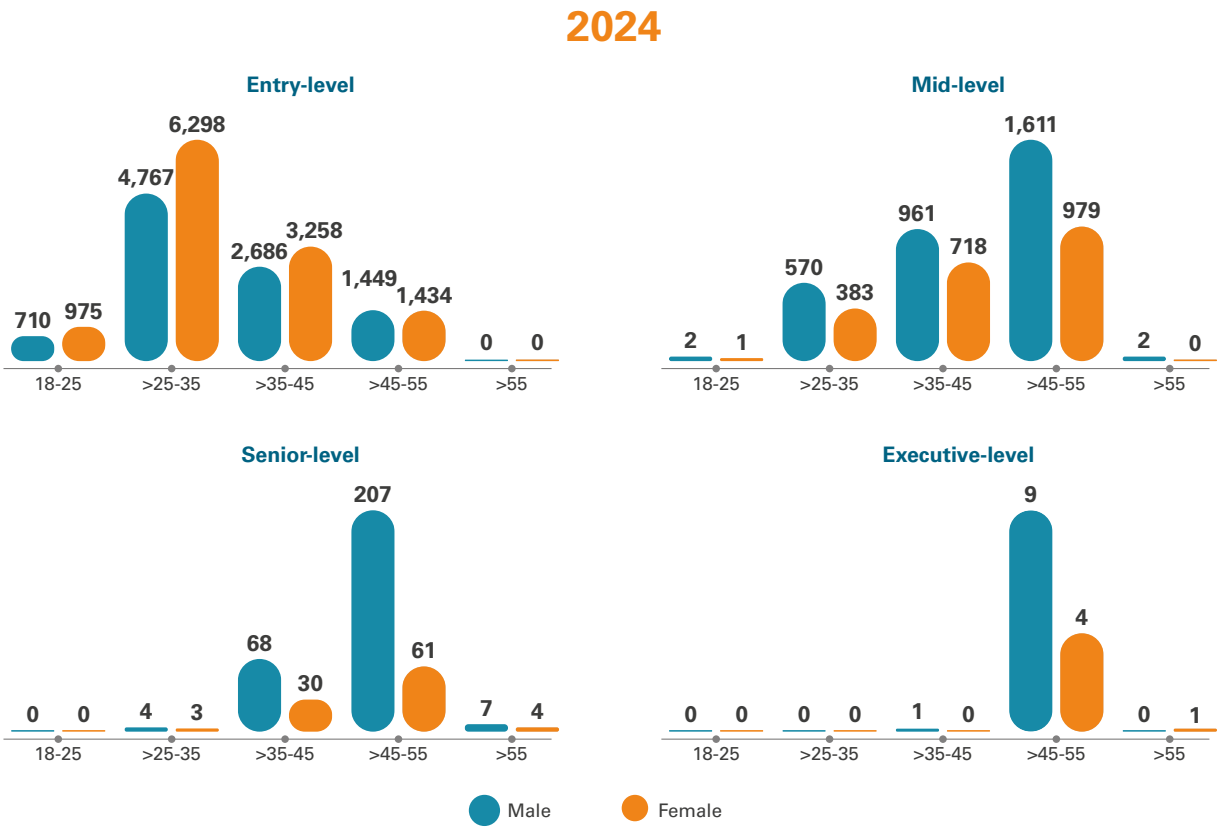


Total Employees based on Age Group

(people)

Age Group (Years)	2024								Total Employee
	Position Level								
	Entry-level		Mid-level		Senior-level		Executive-level		
	Male	Female	Male	Female	Male	Female	Male	Female	
18-25	710	975	2	1	0	0	0	0	**1,688**
>25-35	4,767	6,298	570	383	4	3	0	0	**12,025**
>35-45	2,686	3,258	961	718	68	30	1	0	**7,722**
>45-55	1,449	1,434	1,611	979	207	61	9	4	**5,754**
>55	0	0	2	0	7	4	0	1	**14**

Age Group (Years)	2023								Total Employee
	Position Level								
	Entry-level		Mid-level		Senior-level		Executive-level		
	Male	Female	Male	Female	Male	Female	Male	Female	
18-25	776	1,093	3	1	0	0	0	0	**1,873**
>25-35	5,213	6,888	568	406	2	2	0	0	**13,079**
>35-45	2,646	3,048	949	664	50	19	1	0	**7,377**
>45-55	1,445	1,374	1,353	827	173	49	11	3	**5,235**
>55	0	0	0	0	1	4	1	0	**6**



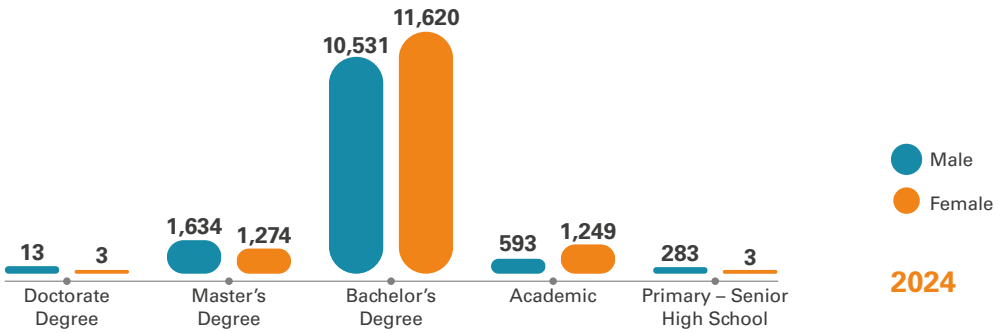
2023

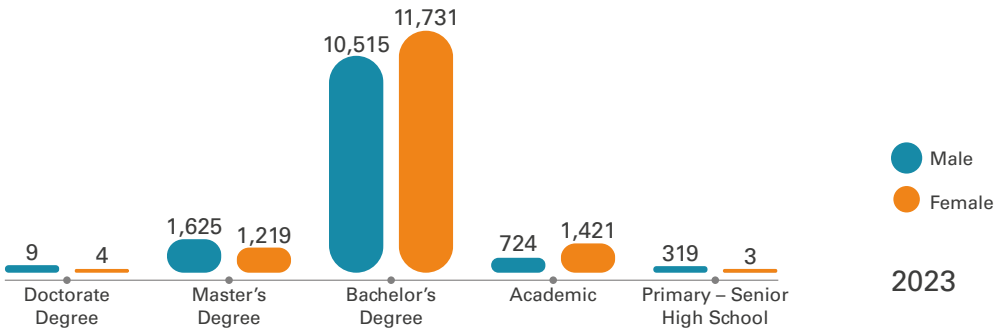


Total Employees based on Education Level

(people)

Education Level	2024			2023		
	Male	Female	Total	Male	Female	Total
Doctorate Degree	13	3	16	9	4	13
Master's Degree	1,634	1,274	2,908	1,625	1,219	2,844
Bachelor's Degree	10,531	11,620	22,151	10,515	11,731	22,246
Academic	593	1,249	1,842	724	1,421	2,145
Primary-Senior High School	283	3	286	319	3	322
Total	**13,054**	**14,149**	**27,203**	**13,192**	**14,378**	**27,570**

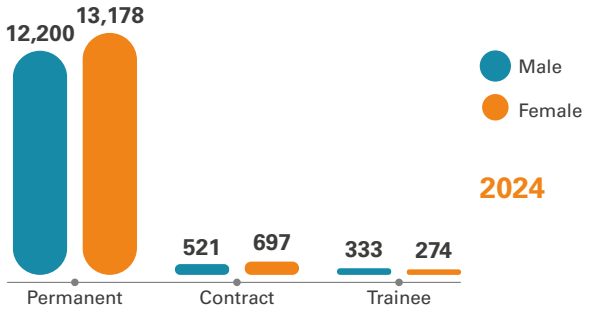


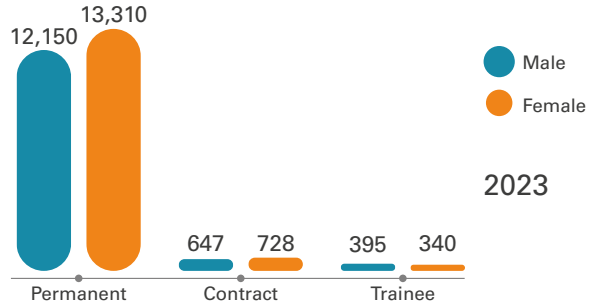


Total Employees based on Employment Status

(people)

Employment Status	2024			2023		
	Male	Female	Total	Male	Female	Total
Permanent	12,200	13,178	25,378	12,150	13,310	25,460
Contract	521	697	1,218	647	728	1,375
Trainee	333	274	607	395	340	735
Total	**13,054**	**14,149**	**27,203**	**13,192**	**14,378**	**27,570**





Employee Turnover

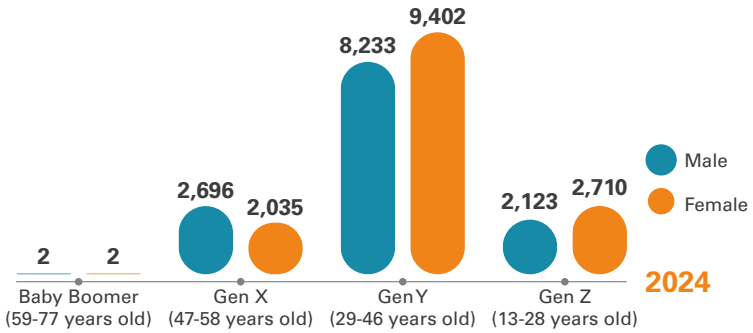
(people)

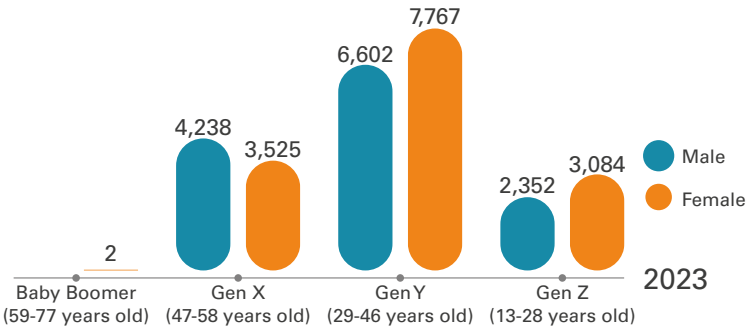
Total Employee Turnover	2024		2023	
	Total Employee	Employee Percentage (%)	Total Employee	Employee Percentage (%)
Number of Employees resign /Termination of Employment	451	1.7%	332	1.2%
Number of new employees/replacements	976	3.6%	1,685	6.1%

Total Employees based on Generation

(people)

Generation	2024			2023		
	Male	Female	Total	Male	Female	Total
Baby Boomer (59-77 years old)	2	2	4	-	2	2
Gen X (47-58 years old)	2,696	2,035	4,731	4,238	3,525	7,763
Gen Y (29-46 years old)	8,233	9,402	17,635	6,602	7,767	14,369
Gen Z (13-28 years old)	2,123	2,710	4,833	2,352	3,084	5,436
Total	**13,054**	**14,149**	**27,203**	**13,192**	**14,378**	**27,570**





Other Employees Not BNI Employees

In addition to full-time employees, there are also other employees in the BNI work environment who come from outsourcing collaborations with service provider companies (vendors) tasked with supporting the smooth operation of the bank. BNI ensures that all employees, including outsourced employees, receive a work environment characterized by mutual respect and the upholding of human rights. In collaborating with third parties, BNI continues to strive to comply with all applicable regulations and laws. In 2024, there are 16,089 employees who are outsourced workers.

Number of Work Accidents

Year	Frequency of Work Accidents	Percentage of Serious and Fatal Work Accidents of Total Employees (%)
2024	-	-

COMPETENCY DEVELOPMENT POLICY

BNI provides equal opportunities for all employees to participate in training and competency development. In 2024, BNI organized various educational and training programs for 26,919 employees or 99.98% of its total headcount, with a total of 272,351 training participants, averaging 10 training sessions per employee.

Average training hours per employee in the Reporting year	Number of employees participating in training programs	Percentage of employees participating in training (%)
134.1 hours/employee	26,919	99.98%*

* The total number of employees is 26,925 (excluding 278 employees with inactive status such as medical leave, early retirement, etc.). Based on the realization at the end of 2024, there are 6 employees who became active at the end of December 2024 and will receive an onboarding program at the beginning of 2025.

There are 8 (eight) areas of training and competency development attended by each level of position based on job level and gender equality throughout 2024, as follows:

Competency Development based on Position Level and Gender Equality in 2024

No.	Position Level	Type of Training	Purpose of Training	Number of Participants*)		
				M	F	Total
1.	Vice President	Finance & Human Capital	Developing employee capabilities related to the finance and human capital sectors	263	124	387
		IT, Digital & Operations	Enhancing employee skills in IT, digital, and operations aspects	322	87	409
		Leadership	Improving leadership capabilities	744	252	996
		Legal, Governance, Audit & Compliance	Developing employee capabilities in the fields of legal, governance, audit, and compliance	856	302	1,158
		Network & Services	Enhancing employee skills in regional business management	167	27	194
		Retail Banking	Increasing employee knowledge related to retail banking	153	34	187
		Risk and Anti Fraud	Improving employee understanding of risk management and anti-fraud aspects	166	49	215
		Wholesale, Treasury & International Banking	Developing employee capabilities related to wholesale, treasury, and international banking	161	50	211
2.	Assistant Vice President	Finance & Human Capital	Developing employee capabilities related to the finance and human capital sectors	948	488	1,436
		IT, Digital & Operations	Enhancing employee skills in IT, digital, and operations aspects	1,773	888	2,661
		Leadership	Improving leadership capabilities	3,204	1,556	4,760
		Legal, Governance, Audit & Compliance	Developing employee capabilities in the fields of legal, governance, audit, and compliance	4,159	2,028	6,187
		Network & Services	Enhancing employee skills in regional business management	1,020	516	1,536
		Retail Banking	Increasing employee knowledge related to retail banking	1,053	538	1,591
		Risk and Anti Fraud	Improving employee understanding of risk management and anti-fraud aspects	1,150	520	1,670
		Wholesale, Treasury & International Banking	Developing employee capabilities related to wholesale, treasury, and international banking	1,137	556	1,693

No.	Position Level	Type of Training	Purpose of Training	Number of Participants*)		
				M	F	Total
3.	Manager	Finance & Human Capital	Developing employee capabilities related to the finance and human capital sectors	1,980	1,596	3,576
		IT, Digital & Operations	Enhancing employee skills in IT, digital, and operations aspects	5,273	4,141	9,414
		Leadership	Improving leadership capabilities	8,021	5,946	13,967
		Legal, Governance, Audit & Compliance	Developing employee capabilities in the fields of legal, governance, audit, and compliance	11,481	8,882	20,363
		Network & Services	Enhancing employee skills in regional business management	2,491	1,841	4,332
		Retail Banking	Increasing employee knowledge related to retail banking	3,063	2,418	5,481
		Risk and Anti Fraud	Improving employee understanding of risk management and anti-fraud aspects	3,375	2,673	6,048
		Wholesale, Treasury & International Banking	Developing employee capabilities related to wholesale, treasury, and international banking	3,528	2,770	6,298
4.	Assistant Manager	Finance & Human Capital	Developing employee capabilities related to the finance and human capital sectors	3,411	3,551	6,962
		IT, Digital & Operations	Enhancing employee skills in IT, digital, and operations aspects	9,726	10,218	19,944
		Leadership	Improving leadership capabilities	19,679	20,722	40,401
		Legal, Governance, Audit & Compliance	Developing employee capabilities in the fields of legal, governance, audit, and compliance	24,990	26,446	51,436
		Network & Services	Enhancing employee skills in regional business management	4,554	4,487	9,041
		Retail Banking	Increasing employee knowledge related to retail banking	7,206	7,772	14,978
		Risk and Anti Fraud	Improving employee understanding of risk management and anti-fraud aspects	4,447	4,892	9,339
		Wholesale, Treasury & International Banking	Developing employee capabilities related to wholesale, treasury, and international banking	5,252	5,458	10,710
5.	Assistant (Assistant & Basic Employee)	Finance & Human Capital	Developing employee capabilities related to the finance and human capital sectors	1,959	2,298	4,257
		IT, Digital & Operations	Enhancing employee skills in IT, digital, and operations aspects	6,580	8,740	15,320
		Leadership	Improving leadership capabilities	13,898	20,349	34,247
		Legal, Governance, Audit & Compliance	Developing employee capabilities in the fields of legal, governance, audit, and compliance	18,963	25,066	44,029
		Network & Services	Enhancing employee skills in regional business management	3,009	3,692	6,701
		Retail Banking	Increasing employee knowledge related to retail banking	4,312	6,607	10,919
		Risk and Anti Fraud	Improving employee understanding of risk management and anti-fraud aspects	2,337	3,244	5,581
		Wholesale, Treasury & International Banking	Developing employee capabilities related to wholesale, treasury, and international banking	2,706	3,202	5,908

*) The number of participants is not the same as the number of employees because each employee participated in more than one training session.

COMPETENCY DEVELOPMENT COSTS

During 2024, the realization of education and training costs for BNI reached IDR201.0 billion, a decrease of 41.9% compared to 2023. This decline is attributed to an increase in the effectiveness of learning delivery, including the internalization of Self-Directed Learning utilizing various digital learning platforms.

Competency Development Costs (Bank Only)

Description	2024 (IDR billion)	2023 (IDR billion)	Increase/ Decrease (IDR billion)	Increase/ Decrease (%)
Education and Training	201.0	346.2	(145.2)	(41.9%)

SENIOR EXECUTIVE VICE PRESIDENT (SEVP) COMPETENCY DEVELOPMENT

No.	Name of Training/Workshop/Conference/ Seminar	Implementation Date	Place of Implementation	Type of Training	Organiser
Rian Eriana Kaslan - SEVP Retail Digital Solutions					
1.	Speakers for the IDE Katadata 2024 Event - Financial Frontier: Confronting the Unpredictable	March 5, 2024	Hotel Kempinski	Speaker	Katadata
2.	Risk Management Certification Exam JK 7	April 22, 2024	LPPI	Certification	LSPP
3.	Speaker for the Payments Banking Forum ASEAN - JP Morgan 2024	May 16 - 17, 2024	Four Season Hotel Bangkok	Speaker	JP Morgan
4.	Moderator for the CTO/CDIO Masterclass Program	May 29, 2024	Brilian Tower	Moderators	BUMN School of Excellence
5.	Executive Overview for Commissioners	October 1, 2024	Grha BNI	Training	LPPI
6.	Speaker at the Panel Discussions in the Tech in Asia Conference 2024	October 24, 2024	The Ritz Calton - Pasific Place	Speaker	Tech in Asia
7.	Speaker at the Cloud & AI Summit for the Financial Service Industry	November 8, 2024	The Westin Jakarta	Speaker	Perbanas with Microsoft
8.	Business Essentials	October to December 2024	Jakarta	In Class	BSE
9.	Executive Education: Think Bigger: Start Choosing Innovative Solutions	December 9-12, 2024	Columbia	In Class	Columbia Business School, New York
Ita Tetralastwati - SEVP Treasury					
1.	International Summit	February 2, 2024	Hotel Borobudur	Forum	BNI
2.	Sharing Session on Artificial Intelligence by Microsoft	February 27, 2024	Menara Pejompongan	Sharing Sessions	BNI
3.	Workshop on Internalizing BNI Culture Transformation	February 28, 2024	Hall Wisma BNI	Workshops	BNI
4.	Mandiri Investment Forum 2024	March 5, 2024	Fairmont Hotel	Forum	Bank Mandiri
5.	BNI Business Meeting 2024	March 8 - 9, 2024	Tentrem, Yogyakarta	Forum	BNI
6.	Risk Management Certification Assessment JK 6	April 19, 2024	LSPP	Certification	LSPP
7.	ACI World Congress 2024	April 22 - 25, 2024	Scandinavia	Forum	ACI
8.	Board of Directors and SEVP Retreat 2024	May 8 -12, 2024	London	Forum	BNI
9.	Facilitator for Sespibank Class 78 in 2024	May 17, 2024	LPPI	Forum	LPPI
10.	Executive Education Program for BOD and SEVP in 2024	June 2 - 7, 2024	Boston	Forum	Harvard Boston
11.	Implementation of General Assessment Center - SEVP 2024	June 14, 2024	Online	Training	DDI
12.	BNI Retreat 2024	September 4 - 8, 2024	Sydney	Forum	BNI
13.	Certification for Financing Experts for Commissioners (BNIMF)	October 2 - 3, 2024	Hotel Pullman	Forum	LSPPI

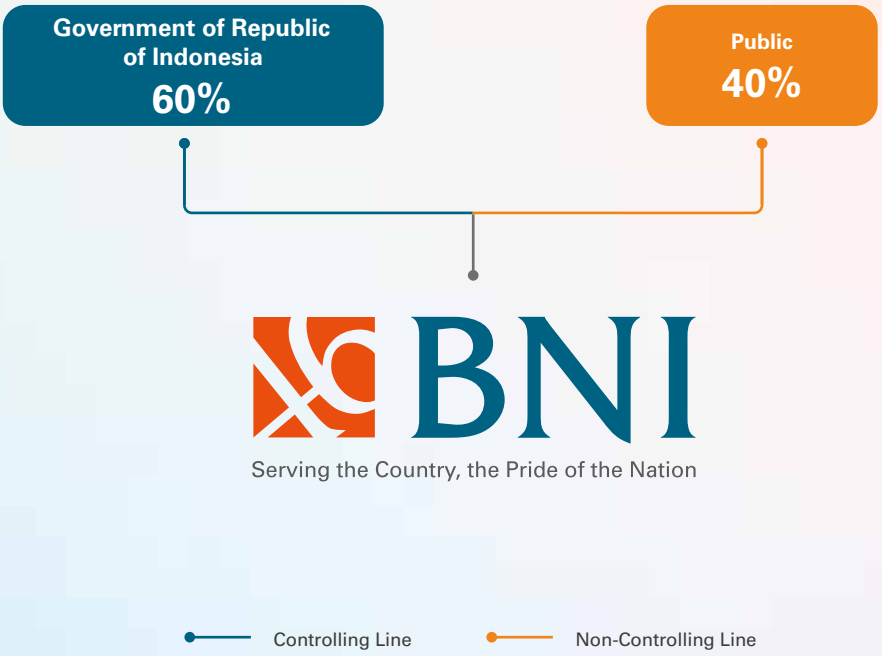
No.	Name of Training/Workshop/Conference/ Seminar	Implementation Date	Place of Implementation	Type of Training	Organiser
14.	BNI Investor Daily Summit 2024	October 8 - 9, 2024	JCC	Forum	BNI
15.	Facilitator for Sespibank Class 17 - Liquidity Risk Material	October 11, 2024	LPPI	Forum	LPPI
16.	Leadership Camp for WHI Sector	November 22-23, 2024	Pullman, Puncak	Forum	BNI
17.	Business Essential Program Batch IV 2024 via Vidcon	November 29, 2024	by Vidcon	Forum	Kementerian BUMN
Anang Basuki - SEVP Operations					
1.	Operational Leadership	March 5, 2024	Raffles Hotel	Sharing Sessions	BNI
2.	BSMR Level 6 Training	April 1, 2024	Grha	Certification	LSPP
3.	Risk Management Certification Assessment JK 7	April 26, 2024	LSPP	Certification	LSPP
4.	Risk Management Certification Exam JK 6	April 26, 2024	LPPI	Certification	LSPP
5.	Business Retreat	May 8 - 13, 2024	London	Seminar	BNI
6.	ORIC 2024 Workshop	May 17, 2024	BNI - Wen	Facilitator	BNI
7.	Board Retreat 2nd 2024	September 5-6, 24	Sydney, Ausie	Seminar	BNI
8.	Executive Education 2024	September 9 - 13, 2024	Lausanne, Swiss	Training	IMD University
9.	Collateral Valuation Discussion	September 3, 2024	Surabaya	Sharing Sessions	BNI
10.	Collateral Valuation Discussion	September 20, 2024	Bandung	Sharing Sessions	BNI
11.	Collateral Valuation Discussion	September 10 - 11, 24	Medan	Sharing Sessions	BNI
12.	Webinar: "Transparency and Public Information Disclosure in Implementing Consumer and Community Protection at BNI"	September 26, 2024	Online - Grha	Sharing Sessions	BNI
13.	Collateral Valuation Discussion	October 16 - 17, 24	Palembang	Sharing Sessions	BNI
14.	Understanding & Strengthening Cash Management Governance	October 23, 2024	Jakarta	Sharing Sessions	Bank Indonesia
15.	Transforming Operations for The Future: Ways and Strategies for Success	November 1, 2024	Jakarta	Sharing Sessions	BNI
16.	BNI Culture Fest 2024	November 14, 2024	Jakarta	Sharing Sessions	BNI
17.	Collateral Valuation Discussion	November 21- 23, 2024	Yogyakarta	Sharing Sessions	BNI
18.	Business Essential	November 2024 to January 2025	Jakarta	In Class	BSE
Victor Erico Korompis - SEVP Information Technology					
1.	Sharing Session IT BNI NWOW	January 10, 2024	BNV	Speaker	BNI
2.	FGD with Commission XI of the Indonesian House of Representatives	February 1, 2024	Menara BNI	Sharing Sessions	BNI
3.	Leadership Division STA	February 2, 2024	Menara BNI	Sharing Sessions	BNI
4.	Sharing Session IT BNI NWOW	February 21, 2024	BNV	Speaker	BNI
5.	Culture Transformation Workshop	February 27, 2024	Ballroom Wisma 46	Sharing Sessions	BNI
6.	Operational Leadership Event	March 5, 2024	Raffles Hotel	Sharing Sessions	BNI
7.	Risk Management Certification Assessment JK 6	April 1, 2024	Grha BNI	Providing Certification	LSPP
8.	Sharing Session Maveric	March 27, 2024	Wilayan 05	Sharing Sessions	BNI
9.	Preparation for Risk Management Certification JK 6	April 1, 2024	Grha BNI		
10.	Risk Management Certification Exam JK 6	April 19, 2024	LPPI	Certification	LSPP
11.	Sharing Session Bootcamp Agile	June 19, 2024	BNU Kota	Sharing Sessions	BNI
12.	Venture Capital Executive Program Venture Capital Executive Program	September 16 - 20, 2024	Berkeley	In Class	Haas School of Business
13.	Sharing Session on Office 365 Migration	September 27, 2024	BNU Kota	Speaker	IFM
14.	Tech Refresh Workshop	October 25, 2024	BNU Kota	Speaker	IFM
15.	Inauguration of Citicon	October 31, 2024	Citicon Jakarta	Sharing Sessions	BNI

No.	Name of Training/Workshop/Conference/ Seminar	Implementation Date	Place of Implementation	Type of Training	Organiser
Steven Suryana - SEVP Wealth Management					
1.	Business Meeting Wilayah 14 Business Meeting Region 14	January 19, 2024	Aston Sentul	Workshops	BNI
2.	Strategy to Expand Your Investment Value	January 25, 2024	Grha BNI	Workshops	BNI
3.	Earnings Call and Press Conference Full Year 2023	January 26, 2024	Vidcon - Jakarta	Workshops	BNI
4.	Business Meeting Region 10	February 02, 2024	Pullman Vimala Hills	Workshops	BNI
5.	The Tech-Powered Future of Indonesia's Wealth Management	February 27, 2024	Park Hyatt Jakarta		
6.	Sharing Session on Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Workshops	BNI
7.	Sharing Session on Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Sharing Sessions	BNI
8.	Speaker: The Tech-Powered Future of Indonesia's Wealth Management	February 29, 2024	Park Hyatt Jakarta	Source person	Synpulse
9.	Leadership Forum	March 8-10, 2024	Hotel Tentrem, Yogyakarta	Workshops	BNI
10.	Business Meeting "Synergize and Streamline: Elevating Productivity and Performance"	March 8, 2024	Hotel Tentrem Yogyakarta	Workshops	BNI
11.	Leadership Forum	March 9, 2024	Hotel Tentrem Yogyakarta	Workshops	BNI
12.	Executive Education for BOD and SEVP in 2024	April 8-11, 2024	Chicago	Executive Education	Nothwestern. Kellogg
13.	Risk Management Certification Exam JK 6	April 26, 2024	LPPI	Certification	LSPP
14.	Board Business Meeting	May 8-12, 2024	London, UK	Workshops	BNI
15.	Compliance Forum	August 14, 2024	Grha BNI Lt 25	Forum	BNI x KPK
16.	Speaker at the Creativepreneur Event	August 25, 2024	Jakarta Convention Center	Seminar	Pertamina
17.	Board Retreat	September 6-8, 2024	Perth, Sydney	Workshops	BNI
18.	Earnings Call and Press Conference 3Q 2024	October 25, 2024	BNI Club Mataram	Seminar	BNI
19.	BNI Investor Daily Summit 2024	October 8-9, 2024	Assembly Hall, JCC Senayan		BNI
Bun Hendra - SEVP Credit Risk					
1.	Supervisory Visit to CMC Tangerang	January 16, 2024	CMC Tangerang - BSD Plaza	Sharing Sessions	BNI
2.	Supervisory Visit to CMC Makassar	January 19, 2024	CMC Makassar - Kantor Wilayah 07	Sharing Sessions	BNI
3.	Earnings Call and Press Conference FY2023 via Vidcon	January 26, 2024	Vidcon - Jakarta	Seminar	BNI
4.	Business & Risk Awareness for CMC Head & HoR	January 26, 2024	Hotel Ambhara - Jakarta	Workshops	BNI
5.	Business & Risk Awareness for CMC Head & HoR	January 27, 2024	Hotel Ambhara - Jakarta	Workshops	BNI
6.	Focus Group Discussion with Commission XI of the Indonesian House of Representatives	February 1, 2024	Ballroom Menara BNI	FGD	BNI
7.	Supervisory Visit to CMC Medan	February 2, 2024	CMC Medan - Kantor Wilayah 01	Sharing Sessions	BNI
8.	Supervisory Visit to CMC Jakarta Kota	February 6, 2024	CMC Jakarta Kota - Kantor Wilayah 12	Sharing Sessions	BNI
9.	Supervisory Visit to CMC Jatinegara and CMC Bekasi	February 20, 2024	CMC Jatinegara - Kantor Wilayah 15	Sharing Sessions	BNI
10.	Sharing Session on Artificial Intelligence by Microsoft for Directors and SEVP	February 27, 2024	BNI Grha Lt. 25	Sharing Sessions	BNI
11.	Onboarding Training Program for Experience Hire - Executive Level	February 28-29, 2024	Online via Zoom Meeting	Training	BNI
12.	BNI Business Meeting 2024	March 7 - 10, 2024	Yogyakarta	Workshops	BNI
13.	Onboarding Training Program for Experience Hire - Executive Level Personnel Material	March 13, 2024	Online via Zoom Meeting	Training	BNI
14.	Preparation for Risk Management Certification JK 6	April 1, 2024	Grha BNI	Providing Certification	BNU/LSPP

No.	Name of Training/Workshop/Conference/ Seminar	Implementation Date	Place of Implementation	Type of Training	Organiser
15.	Risk Management Certification Exam JK 6	April 22, 2024	LPPI	Certification	LSPP/BNV
16.	BNI Board Retreat 2024	May 8-12, 2024	London, UK	Workshops	BNI
17.	Opening and Motivational Session for the Commercial Segment	May 17, 2024	Hotel Ashley Wahid Hasyim-Jakarta	Seminar	BNI
18.	Supervisory Visit to CMC Batam	June 6, 2024	CMC Batam	Work visit	BNI
19.	Executive Education at IMD Business School	June 24-28, 2024	Lausanne, CH Switzerland	Executive Education	IMD Business School
20.	Facilitator of the Opening of Commercial Credit Risk (CCR) Refreshment Training - Batch 2	July 12, 2024	Ibis Style Tanah Abang	Training	BNI
21.	Facilitator of the Opening of Commercial Credit Risk (CCR) Refreshment Training - Batch 2	July 19, 2024	Ibis Style Tanah Abang	Training	BNI
22.	Supervisory Visit to CMC Surabaya Pemuda	August 8, 2024	CMC Surabaya Pemuda	Sharing Sessions	BNI
23.	Supervisory Visit to CMC Denpasar	August 9, 2024	CMC Denpasar	Sharing Sessions	BNI
24.	Compliance Forum	August 14, 2024	Grha BNI Lt 25	Forum	BNI x KPK
25.	Earnings Call and Press Conference 1H-2024	August 22, 2024	BNI Mataram	Seminar	BNI
26.	Supervisory Visit to CMC Semarang	August 28, 2024	CMC Semarang	Sharing Sessions	BNI
27.	BOD & SEVP Retreat	September 6-8, 2024	Perth,Sydney	Workshops	BNI
28.	Sharing Session "Global Banking Trends 2024"	September 10, 2024	Grha BNI Lt. 33	Sharing Sessions	BNI
29.	Supervisory Visit to CMC Solo	September 20, 2024	CMC Solo	Sharing Sessions	BNI
30.	Press Conference for BNI Investor Daily Summit 2024 "Accelerating Resilient Growth"	September 30, 2024	BNI Menara Pejompongan	Workshops	BNI
31.	Supervisory Visit to CMC Pekanbaru	October 4, 2024	CMC Pekanbaru	Sharing Sessions	BNI
32.	Speaker at the National Seminar Agenda FKDK BPDSI	October 9, 2024	Bali	Seminar	FKDK BPDSI
33.	Assessment SEVP 2024	October 16, 2024	Online via Zoom Meeting	Training	BNU
34.	BNI INT Summit	November 4, 2024	Top Golf Jakarta	Workshops	BNI
35.	NTV Business Forum	November 4, 2024	Hotel Raffles	Workshops	
36.	Culture Fest with KBUMN	November 14, 2024	Menara BNI Pejompongan	Workshops	BNI
37.	BNI INT Summit	November 4, 2024	Top Golf Jakarta	Workshops	BNI
38.	NTV Business Forum	November 4, 2024	Hotel Raffles	Workshops	
Pancaran Affendi - SEVP Corporate Banking					
1.	Earnings Call and Press Conference FY2023 via Vidcon	January 26, 2024	Vidcon - Jakarta	Seminar	BNI
2.	Indonesia Incorporated Day - Collaboration Towards Global SOEs	January 27, 2024	The Laguan Nusa Dua, Bali	Seminar	BNI
3.	ESG Framework in Indonesia with the Coordinating Ministry for Maritime Affairs and Investment - Breakfast Meeting	January 30, 2024	Grha BNI, Lt. 33	Sharing Sessions	BNI
4.	Focus Group Discussion with Commission XI of the Indonesian House of Representatives	February 1, 2024	Ballroom Menara BNI	FGD	BNI
5.	Business Meeting Region 10 in 2024	February 2, 2024	Pullman Ciawi Vimala Hills	Source person	BNI
6.	International Banking & FI Summit (INT Summit)	February 2, 2024	Hotel Borobudur	Source person	BNI
7.	Sharing Session on Artificial Intelligence by Microsoft for Directors and SEVP	February 27, 2024	BNI Grha Lt. 25	Sharing Sessions	BNI
8.	Workshop Economy Outlook 2024 for United Tractors Group (Astra Group)	February 28, 2024	Ballroom Kantor United Tractors	Workshops	BNI
9.	Onboarding Training Program for Experience Hire - Executive Level	February 28 -29, 2024	Online via Zoom Meeting	Training	BNI
10.	BNI Business Meeting 2024	March 7 - 10, 2024	Yogyakarta	Workshops	BNI
11.	Onboarding Training Program for Experience Hire - Executive Level Personnel Material	March 13, 2024	Online via Zoom Meeting	Training	BNI

No.	Name of Training/Workshop/Conference/ Seminar	Implementation Date	Place of Implementation	Type of Training	Organiser
12.	Preparation for Risk Management Certification JK 7	April 1, 2024	Grha BNI	Providing Certification	BNU/LSPP
13.	Risk Management Certification Exam JK 7	April 22, 2024	LPPI	Certification	LSPP/BNV
14.	Sharing Session with the Indonesia Corporate Counsel Association (ICCA) and Widyawan & Partners Linklaters (Linklaters)	May 14, 2024	Grha BNI, Lt. 25	Sharing Sessions	BNI
15.	BNI Board Retreat 2024	May 8-12, 2024	London, UK	Workshops	BNI
16.	Executive Education: Wharton School	June 9-14, 2024	Philadelphia, US	Training	BNI
17.	Closing Remarks for the Round Table Discussion "The Challenges in Trade Finance and FI Business Landscape"	June 15, 2024	Grha BNI Lt. 33	Sharing Sessions	BNI
18.	Compliance Forum "Realizing an Anti-Corruption Culture Through the Naming of Integrity Values"	August 14, 2024	Online via Zoom Meeting	Forum	BNI
19.	Earnings Call for BNI Performance 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Seminar	BNI
20.	Sharing Session "Global Banking Trends 2024"	September 10, 2024	Grha BNI Lt. 33	Sharing Sessions	BNI
21.	Webinar/Seminar "Transparency and Public Information Disclosure in Implementing Consumer and Community Protection at BNI"	September 26, 2024	Online via Zoom Meeting	Seminar	BNI
22.	BNI Investor Daily Summit 2024	October 8 - 9, 2024	Assembly Hall, JCC Senayan	Seminar	BNI
23.	Assessment SEVP 2024	October 16, 2024	Online via Zoom Meeting	Training	BNU/DDI
24.	Earnings Call and Press Conference 3Q-2024	October 25, 2024	BNI Mataram	Seminar	BNI
25.	BNI Culture Fest 2024	November 14, 2024	Menara BNI Pejompongan	Workshops	BNI
26.	WHI Leadership Camp 2024	November 22 - 23, 2024	Pullman Ciawi Vimala Hills	Workshops	BNI
Emmy Nurhayati - SEVP Human Capital					
1.	Sharing Session on Corporate Plan	January 10, 2024	BNI	Workshops	BNI
2.	Product Knowledge for BNI Securities	May 7, 2024	BNI	In Class	BNI
3.	Compliance Forum	August 14, 2024	Grha BNI Lt 25	Forum	BNI x KPK
4.	BNI Investor Daily Summit 2024	October 8 - 9, 2024	Assembly Hall, JCC Senayan	Seminar	BNI
5.	WHI Leadership Camp 2024	November 22, 2024	Pullman Ciawi Vimala Hills	Workshop	BNI
6.	Speaker at the Aspirasi (Formation) SP BNI Night Forum	December 3, 2024	Roemah Aspirasi SP BNI	Workshop	BNI
7.	BNI INT Summit 2024 (INTSpire)	December 4, 2024	TopGolf Jakarta	Workshop	BNI
8.	RHM Workshop	December 4, 2024	BNU, Slipi	Workshop	BNI

Shareholder Structure and Composition [ACGS C.1.2]



Company Shareholders Composition as of January 1, 2024

No.	Investor	Total Investor	Number of Shares	Ownership %
National Investors				
1	Government of Republic of Indonesia	1	22,378,387,750	60.00000
2	Indonesian Individuals	118,458	1,594,259,654	4.27446
3	Cooperatives	19	839,218	0.00225
4	Foundations	39	41,489,470	0.11124
5	Pension Funds	133	1,489,922,804	3.99472
6	Insurance	180	636,524,360	1.70662
7	Bank	8	47,137,900	0.12638
8	Limited Liability Companies	291	86,263,195	0.23129
9	Government Institution	1	132	0.00000
10	Other Business Entities	5	10,596	0.00003
11	Mutual Funds	285	898,857,966	2.40998
Sub Total		**119,420**	**27,173,693,045**	**72.85697**
Foreign Investors				
1	Foreign Individuals	296	3,701,924	0.00993
2	Foreign Business Enterprises	1,519	10,119,917,947	27.13310
Sub Total		**1,815**	**10,123,619,871**	**27.14303**
Total		**121,235**	**37,297,312,916**	**100.00000**

Company Shareholders Composition as of December 31, 2024

No.	Investor	Total Investor	Number of Shares	Ownership %
National Investors				
1	Government of Republic of Indonesia	1	22,378,387,750	60.00000
2	Indonesian Individuals	181,794	2,272,634,103	6.09329
3	Cooperatives	20	2,822,158	0.00757
4	Foundations	40	47,541,600	0.12747
5	Pension Funds	165	1,599,427,408	4.28832
6	Insurance	188	366,539,178	0.98275
7	Bank	7	6,591,500	0.01767
8	Limited Liability Companies	377	118,946,444	0.31891
9	Government Institution	1	132	0.00000
10	Other Business Entities	5	10,596	0.00003
11	Mutual Funds	290	715,421,858	1.91816
Sub Total		**182,888**	**27,508,322,727**	**73.75417**
Foreign Investors				
1	Foreign Individuals	337	2,850,660	0.00764
2	Foreign Business Enterprises	1,414	9,786,139,529	26.23819
Sub Total		**1,751**	**9,788,990,189**	**26.24583**
Total		**184,639**	**37,297,312,916**	**100.00000**

20 Largest BNI Shareholders Composition as of January 1, 2024

No	Investor	Number of Shares	%	Status	Location
1	Government of Republic of Indonesia	22,378,387,750	60.0000000	Republic of Indonesia	Indonesia
2	DJS Ketenagakerjaan Program JHT	1,173,238,336	3.1456377	Local Business Enterprise	Indonesia
3	Retail Individual	678,000,000	1.8178253	Indonesian individual	Indonesia
4	BNYM RE BNYMLB RE Employees PROVIDENTFD Board-2039927326	228,836,806	0.6135477	Foreign Business Enterprise	Malaysia
5	JPMSE AMS RE AIF CLT RE-Stichting Depositary APG Emerging Markets Equity Pool Stock Index Fund	224,409,068	0.6016762	Foreign Business Enterprise	Netherlands
6	JPMCB NA RE-Vanguard Total International Stock Index Fund	203,936,112	0.5467850	Foreign Business Enterprise	United States of America
7	JPMCB NA RE - Vanguard Emerging Markets Stock Index Fund	202,201,052	0.5421330	Foreign Business Enterprise	United States of America
8	DJS Ketenagakerjaan Program JP	195,356,600	0.5237820	Local Business Enterprise	Indonesia
9	Citibank New York S/A Government of Norway - 16	174,500,000	0.4678621	Foreign Business Enterprise	Norway
10	HSBC BANK PLC S/A Saudi Central Bank-No. 2-FE-Invesco HBEU as Agent	171,150,176	0.4588807	Foreign Business Enterprise	Saudi Arabia
11	State Street Bank-MFS Emerging Markets Equity Fund	165,702,900	0.4442757	Local Business Enterprise	United States of America
12	Citibank New York S/A Government of Norway - 23	165,000,000	0.4423911	Local Business Enterprise	Norway
13	BNYMSANV RE BNYMSANVLUX RE S/A Espring INV	151,958,072	0.4074236	Local Business Enterprise	Luxembourg
14	Citibank Singapore S/A Government of Singapore	138,503,168	0.3713489	Foreign Business Enterprise	Singapore
15	Citibank New York S/A Government of Norway - 15	138,474,000	0.3712707	Foreign Business Enterprise	Norway
16	Morgan Stanley And Co INTL PLC - Firm AC	138,280,898	0.3707530	Foreign Business Enterprise	England, UK
17	BNYMSANV RE Sanvlux RE Invesco Funds-2039845493	135,435,800	0.3631248	Foreign Business Enterprise	Luxembourg
18	State Street Bank-Ishares Core MSCI Emerging Markets ETF	133,705,400	0.3584853	Foreign Business Enterprise	United States of America
19	THE NTTST Co S/A British Columbia Investment Management Corporation	128,348,500	0.3441226	Foreign Business Enterprise	Canada
20	State Street Bank-Principal Global Investors Collective Investment Trust	126,996,800	0.3404985	Foreign Business Enterprise	United States of America

20 Largest BNI Shareholders Composition as of December 31, 2024

No	Investor	Number of Shares	%	Status	Location
1	Government of Republic of Indonesia	22,378,387,750	60.0000000	Republic of Indonesia	Indonesia
2	DJS Ketenagakerjaan Program JHT	1,173,238,336	3.1456377	Pension Funds	Indonesia
3	Retail Individual	746,000,000	2.0001441	Indonesian Individuals	Indonesia
4	BNYM RE BNYMLB RE Employees Providentfd Board-2039927326	387,462,306	1.0388478	Foreign Business Enterprise	Malaysia
5	SSB 52B0 MFS Emerging Markets Equity Fund -2183964118	269,910,400	0.7236725	Foreign Business Enterprise	United States of America
6	JPMSE AMS RE AIF CLT RE-Stichting Depositary APG Emerging Markets Equity Pool	252,313,764	0.6764931	Foreign Business Enterprise	Netherlands
7	JPMCB NA RE-Vanguard Total International Stock Index Fund	208,876,012	0.5600297	Foreign Business Enterprise	United States of America
8	Morgan Stanley and Co INTL PLC - FIRM AC	207,861,721	0.5573102	Foreign Business Enterprise	England, UK
9	JPMCB NA RE - Vanguard Emerging Markets Stock Index Fund	189,362,952	0.5077121	Foreign Business Enterprise	United States of America

No	Investor	Number of Shares	%	Status	Location
10	DJS Ketenagakerjaan Program JP	177,374,300	0.4755686	Dana Pensiun	Indonesia
11	BNYMSANV RE Sanvlux RE Invesco Funds	167,495,100	0.4490809	Foreign Business Enterprise	Luxembourg
12	HSBC Bank PLC S/A Saudi Central Bank-No. 2-FE-Invesco HBEU as Agent	155,843,376	0.4178408	Foreign Business Enterprise	Saudi Arabia
13	Citibank NewYork S/A Government of Norway - 16	143,304,200	0.3842212	Foreign Business Enterprise	Norway
14	SSB AAHA Principal GLB Investors Collctve INVTTST-2183966095	135,678,700	0.3637761	Foreign Business Enterprise	United States of America
15	SSB 2Q27 Ishares Core MSCI Emerging Markets ETF -2183966403	131,307,700	0.3520567	Foreign Business Enterprise	California
16	BNYMSANV RE BNYM RE People's Bank of China	131,033,300	0.3513210	Foreign Business Enterprise	China
17	BBH Luxembourg S/A Fidelity Funds-Asian Smaller Companies Pool	125,753,600	0.3371653	Foreign Business Enterprise	Luxembourg
18	Citibank NewYork S/A Government of Norway - 15	125,152,500	0.3355537	Foreign Business Enterprise	Norway
19	NTC-CAPE ANN Global Developing Markets Fund	114,426,800	0.3067964	Foreign Business Enterprise	United States of America
20	HSBC-Fund Services A/C 086 HBAP - Invesco Ltd A/C Best Investment Corporation	112,010,700	0.3003184	Foreign Business Enterprise	China

Shareholders with 5% or Over Ownership

Name of Shareholder	January 1, 2024		December 31, 2024	
	Number of Shares	Percentage Ownership %	Number of Shares	Percentage Ownership %
Republic of Indonesia	22,378,387,750	60.0	22,378,387,750	60.0

Shareholders with Less Than 5% Ownership

No	Shareholder Group	January 1, 2024			December 31, 2024		
		Number of Shares	Number of Shares (lembar)	Percentage Ownership %	Number of Shareholders	Number of Shares	Percentage Ownership %
Domestic Investor							
1	Indonesian Individuals	118,458	1,594,259,654	4.27446	181,794	2,272,634,103	6.09329
2	Cooperatives	19	839,218	0.00225	20	2,822,158	0.00757
3	Foundations	39	41,489,470	0.11124	40	47,541,600	0.12747
4	Pension Funds	133	1,489,922,804	3.99472	165	1,599,427,408	4.28832
5	Insurance	180	636,524,360	1.70662	188	366,539,178	0.98275
6	Banks	8	47,137,900	0.12638	7	6,591,500	0.01767
7	Limited Liability Companies	291	86,263,195	0.23129	377	118,946,444	0.31891
8	Government Agencies	1	132	0.00000	1	132	0.00000
9	Other Business Enterprises	5	10,596	0.00003	5	10,596	0.00003
10	Mutual Funds	285	898,857,966	2.40998	290	715,421,858	1.91816
Sub Total		**119,420**	**4,795,305,295**	**12.85697**	**182,888**	**27,508,322,727**	**73.75417**
Foreign Investor							
1	Foreign Business Enterprises	1,519	10,119,917,947	27.13310	1,414	9,786,139,529	26.23819
2	Foreign Individuals	296	3,701,924	0.00993	337	2,850,660	0.00764
Sub Total		**1,815**	**10,123,619,871**	**27.14303**	**1,751**	**9,788,990,189**	**26.24583**
Total		**121,234**	**14,918,925,166**	**40.00000**	**184,638**	**14,918,925,166**	**40.00000**

Share Ownership (Direct and Indirect) by the Board of Directors and the Board of Commissioners [ACGS C.1.3]

Name	Position	January 1, 2024				
		Direct Ownership		Indirect Ownership		
		Number of Shares (shares)	Percentage Ownership (%)	Number of Shares (shares)/ Company Name	Percentage Ownership (%)	
BOARD OF DIRECTORS						
Royke Tumilaar	President Director	1,115,346	0.0029904	-	-	
Putrama Wahju Setyawan[1)]	Deputy President Director	1,686,386	0.0045215	-	-	
Novita Widya Anggraini	Finance Director	948,044	0.0025419	- -	-	
Corina Leyla Karnalies[2)]	Retail Banking Director	1,442,034	0.0038663	-	-	
David Pirzada	Risk Management Director	880,044	0.0023595	-	-	
Ronny Venir	Network & Services Director	1,559,656	0.0041817	-	-	
Mucharom	Human Capital & Compliance Director	348,008	0.0009331	-	-	
Toto Prasetio	Technology & Operations Director	89,856	0.0002409	-	-	
I Made Sukajaya[3)]	Enterprise and Commercial Banking Director	4	0.0000000	- -	-	
Hussein Paolo Kartadjoemena[3)]	Digital and Integrated Transaction Banking Director	301,478	0.0007	-	-	
Agung Prabowo[4)]	Wholesale & International Banking Director	101,356	0.0002	- -	-	
Munadi Herlambang[5)]	Institutional Banking Director	0	0	-	-	
Adi Sulistyowati[6)]	Deputy President Director	905,706	0.0024283	-	-	
Sis Apik Wijayanto[6)]	Enterprise & Commercial Banking Director	1,579,946	0.0042361	-	-	
Silvano Winston Rumantir[6)]	Wholesale & International Banking Director	948,044	0.0025419	-	-	
Muhammad Iqbal[6)]	Institutional Banking Director	948,044	0.0025419	-	-	
BOARD OF COMMISSIONERS						
Pradjoto	President Commissioner (Independent Commissioner)	0	0	-	-	
Pahala Nugraha Mansury	Vice President Commissioner	0	0	-	-	
Sigit Widyawan	Independent Commissioner	0	0			
Askolani[7)]	Commissioner	809,086	0.0021693	-	-	
Asmawi Syam	Independent Commissioner	0	0	-	-	
Septian Hario Seto	Independent Commissioner	0	0	-	-	
Iman Sugema	Independent Commissioner	0	0	-	-	
Erwin Rijanto Slamet	Independent Commissioner	0	-	-	-	
Fadlansyah Lubis	Commissioner	43,484	0.0001166	-	-	
Robertus Billitea	Commissioner	42,400	0.001137	-	-	
Mohamad Yusuf Permana[8)]	Commissioner	0	0	-	-	
Susyanto[9)]	Commissioner	634,594	0.0017014	-	-	

Notes:
1. Transferred from the original assignment as Director of Retail Banking to Deputy President Director since March 4, 2024, and effective based on OJK approval since September 2, 2024.
2. Transferred from the original assignment as Director of Digital and Integrated Transaction Banking to Director of Retail Banking since March 4, 2024.
3. Served as Director since March 4, 2024, and effective based on OJK approval since September 2, 2024.
4. Served as Director of Wholesale & International Banking since March 4, 2024, and effective based on OJK approval since October 7, 2024.
5. Served as Director of Institutional Banking since March 4, 2024, and not yet effective.
6. Ceased to serve as Director since March 4, 2024.
7. His term ended and was reappointed based on the decision of the Annual General Meeting of Shareholders on March 4, 2024, as Commissioner for the second term since March 4, 2024.
8. Served as Commissioner since March 4, 2024, and effective based on OJK approval since September 2, 2024.
9. Ceased to serve as Commissioner since March 4, 2024

	December 31, 2024			
	Direct Ownership		Indirect Ownership	
	Number of Shares (shares)	Percentage Ownership (%)	Number of Shares (shares)/ Company Name	Percentage Ownership (%)
	3,656,941	0.0098048	-	-
	3,879,526	0.0104016	-	-
	3,143,884	0.0084293	-	-
	3,506,474	0.0094014	-	-
	2,859,984	0.0076681	-	-
	3,539,596	0.0094902	-	-
	2,541,148	0.0068132	-	-
	2,163,696	0.0058012	-	-
	576,912	0.0015468	-	-
	918,611	0.0024629	-	-
	101,356	0.0002718	-	-
	0	0	-	-
	-	-	-	-
	-	-	-	-
	-	-	-	-
	-	-	-	-
	0	0	-	-
	677,291	0.0018159	-	-
	0	0		
	1,752,462	0.0046986		
	0	0		
	0	0		
	0	0	-	-
	0	0	-	-
	986,860	0.0026459	-	-
	864,066	0.0023167	-	-
	0	0	-	-
	-	-	-	-

Shareholders and Percentage of Ownership Based on Classification as of December 31, 2024

Shareholders	Number of Shareholders	Total Shares (shares)	Ownership (%)
Local Institutions	1,093	2,857,300,874	7.66088
Foreign Institutions	1,414	9,786,139,529	26.23819
Local Individuals	181,794	2,272,634,103	6.09329
Foreign Individuals	337	2,850,660	0.00764

Executive/Senior Management Share Ownership

Executive Officer Share Ownership [ACGS C.1.4]

Share ownership of employees who are Executive Officers/Senior Management is part of the Variable Remuneration for Employees, the disclosure of which is contained in this Annual Report on page 785.

Information on the Company's Majority and Controlling Shareholder [ACGS C.1.2]

The majority/controlling shareholder of the Bank, either directly or indirectly, is the Republic of Indonesia, represented by the Government of the Republic of Indonesia/Ministry of State-Owned Enterprises (SOE), with ownership of 60.00% or 22,378,387,750 shares. The Government of the Republic of Indonesia is also the name of the ultimate owner of the Company.

MAJORITY AND CONTROLLING SHAREHOLDERS





Name of Shareholder	Address	Number of Shares (shares)	Percentage Ownership (%)
Government of the Republic of Indonesia Represented by the Ministry of State-Owned Enterprises	**Kantor Kementerian BUMN** Jl. Medan Merdeka Selatan No. 13 Jakarta Pusat 10110 DKI Jakarta, Indonesia Tel. +62 21 29935678 Fax. +62 21 29935740 www.bumn.go.id	22,378,387,750	60.00000


BNI

List of Subsidiaries, Ownership through Subsidiaries and/or Associated Entities [ACGS C.1.5]

Name	Line of Business	Domicile	Year of Establishment	Year of Commercial Operation
SUBSIDIARIES				
PT BNI Multifinance	Financing	Jakarta	1983	1983
PT BNI Sekuritas	Brokerage and Underwriter	Jakarta	1995	1995
PT BNI Life Insurance	Life Insurance Services	Jakarta	1996	1997
BNI Remittance Ltd.	Remittance Services	Hong Kong	1997	1998
PT Bank Hibank Indonesia	Banking	Jakarta	1993	1993
PT BNI Modal Ventura	Venture Capital	Jakarta	2022	2022
OWNERSHIP THROUGH SUBSIDIARIES				
PT BNI Asset Management	Investment Manager	Jakarta	2011	2011
BNI Securities Pte. Ltd.	Brokerage Services, Underwriting, and Advisory Activities in the Capital Market	Singapore	2021	2021
ASSOCIATED ENTITIES				
PT Pemeringkat Efek Indonesia	Securities Rating Agency	Jakarta	1994	1994
PT Kustodian Sentral Efek Indonesia	Central Custodian	Jakarta	1998	1998
PT Kliring Penjaminan Efek Indonesia	Clearing and Guarantee	Jakarta	1996	1996
PT Bank Mizuho Indonesia	Banking	Jakarta	2001	2001
PT Bank SMBC Indonesia Tbk	Banking	Jakarta	1958	1960
PT Bank Syariah Indonesia Tbk	Banking	Jakarta	2021	2021

*) unaudited
**) consolidated

	Year of Last Capital Participation	BNI Ownership (%)		Operational Status	Total Assets in 2024* (IDR million)
		2024	2023		
	2023	99.998%	99.998%	Operating	6,075,604
	2019	75.00%	75.00%	Operating	1,982,755**)
	2012	60.00%	60.00%	Operating	26,675,991
	2009	100.00%	100.00%	Operating	8,636
	2022	63.92%	63.92%	Operating	17,798,871
	2022	99.98%	99.98%	Operating	517,250
	2011	99.90%	99.90%	Operating	202,590
	2023	75.00%	75.00%	Operating	83,241
	2014	0.14%	0.14%	Operating	416,000
	2022	2.50%	2.50%	Operating	8,266,760
	2024	1.11%	1.11%	Operating	4,416,775
	2020	1.00%	1.00%	Operating	88,274,841
	2020	0.11%	0.15%	Operating	195,538,337 (as of Nov 24)
	2021	23.24%	23.24%	Operating	408,613,432

BRIEF INFORMATION ON SUBSIDIARIES

PT BNI Multifinance

Line of Business	Financing
Business Profile	PT BNI Multifinance was established on April 8, 1983 based on Notarial Deed by Kartini Muljadi, S.H., No. 21, under the name of PT BNI-AMEX Leasing, as a cooperation between PT Bank Negara Indonesia (Persero) Tbk (BNI) and American Express Leasing Corporation (AMEX). PT BNI-AMEX Leasing's name has been amended several times with the last one to PT BNI Multifinance, being notarized by deed No. 103 dated June 27, 1994. To strengthen its identity, BNI Multifinance changed its name to BNI Finance in October 2023, which has since come into use. BNI Finance commenced its commercial operations in 1983, engaging in funding Investments, Working Capital, Multipurpose and Operating Leases. Since 2022, BNI Finance has refocused its business on financing in the consumer segment. In an effort to become a Market Leader in Consumer Finance, in 2023 BNI Multifinance increased its outlets to 30 (thirty) branch offices spread across several large cities in Indonesia. And in 2024, BNI Finance made further expansion by opening 22 new outlets that added to a total of 52 BNI Finance branch offices spread throughout Indonesia. BNI Finance has also collaborated with 1,655 partner dealers that serve as its growth engines. In a sustainable transformation process, BNI Finance has taken various strategic steps, e.g., digitally strengthening business processes. In 2024, BNI Finance obtained ISO 27001:2022 certification for its Information Security Management System (SMKI). This certification was a testament to BNI Finance's commitment to maintaining the security and confidentiality of information. BNI Finance supports its operations with competent resources in the financing sector. Currently, BNI Finance has a total headcount of 843 employees, 24% of whom are stationed at the head office and the remaining 76% at branch offices.
Year of Establishment	1983
Total Assets in 2024	IDR6,075,604 million (unaudited)
Share Ownership	99.998%
Operational Status	Operating
Address	Graha Binakarsa lantai 11th Fl. Lot. E-F and 12th Fl. Jl. HR. Rasuna Said Kav. C-18 Kuningan, Jakarta Selatan 12940
Company Management	**Board of Commissioners** • President Commissioner/Independent : Suhartono • Commissioner : Hari Satriyono • Commissioner : Ita Tetralastwati* **Board of Directors** • President Director : Yenanto Siem • Director : Albertus Henditrianto • Director : Legendariah

* in the fit and proper test process

PT BNI Sekuritas

Line of Business	Securities Brokerage and Underwriter
Business Profile	PT BNI Sekuritas ("BNI Sekuritas" or "the Company") is a subsidiary of PT Bank Negara Indonesia (Persero) Tbk ("BNI") and established based on Notarial Deed No. 22 dated April 12, 1995 in Jakarta (as amended by Deed of Amendment No. 39 dated May 3, 1995). The Company runs business in the field of securities brokerage, securities underwriting, and other related activities based on the approval of the relevant authorities (SK No. KEP-19/PM/1995, KEP-020/PM/1995 dated August 8, 1995, and KEP-07/PM-MI/1995 dated October 23, 1995), by following the rules of the Capital Market and Financial Institution Supervisory Agency ("BAPEPAM-LK") and applicable regulations. BNI Sekuritas also has obtained a permit and is registered with the Financial Services Authority ("OJK") as a provider of securities underwriting services, securities brokerage, and mutual fund sales agent. In line with capital market developments and regulations and the implementation of the investment manager independence in accordance with Bapepam LK Regulation No. V.D.11 as stated in the Chairman of BapepamLK Decree No. Kep-480/BL/2009 dated December 31, 2009 regarding guidelines for investment manager functions, the BNI Sekuritas Investment Manager Division has been separated and was established as a legal entity subsidiary called PT BNI Asset Management ("BNI-AM"). The establishment of BNI-AM was then approved at the Extraordinary General Meeting of Shareholders ("EGMS") of BNI Sekuritas on March 1, 2011 with the Company's total share of 99.99% in BNI-AM. In 2011, SBI Sekuritas Co. Ltd was officially involved in capital injection in BNI Sekuritas. This corporate step changed the share ownership structure of BNI Sekuritas, with BNI then owning 75% and SBI Sekuritas Co. holding 25%. In October 2014, all of the shares of SBI Sekuritas Co. Ltd. were transferred to SBI Financial Services Co., Ltd. so by December 31, 2018, the composition of BNI shares in BNI Sekuritas remained 75% while the remaining 25% was held by SBI Financial Services Co., Ltd. Furthermore, in order to improve wholesale banking services that provide convenience for customers to invest anywhere, in 2021, BNI Sekuritas entered in to collaboration with BNI Group to expand its business to Singapore through the establishment of BNI Securities Pte. Ltd. ("BSPL") BNI Sekuritas has been been actifve in the securities and capital market industry for more than 29 years and continued to strive to develop and improve the quality of its range of products and services in order to meet every customer's needs. All the achievements made by BNI Sekuritas should not be dissosiated from the company's consistent efforts to implement Good Corporate Governance (GCG) wiht consistency, which is based on its unwavering commitment to run a healthy business, in the right corridor, and wiht strict comliance with all regulatory provisions. Consistent and sustainable implementation of GCG is expected to create quality work standards based on ethics. In the long term, they will increase the value of the Company to ensure that the interests of Shareholders and Stakeholders are well protected.
Year of Establishment	1995
Total Assets in 2024	IDR1,982,755 million (unaudited)
Share Ownership	75.00%
Operational Status	Operating
Address	Sudirman Plaza Indofood Tower, 16th Fl. Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia
Company Management	**Board of Commissioners** • President Commissioner/Independent : Rudy Tandjung • Commissioner : Kenji Nakanishi • Commissioner : Pancaran Affendi* **Board of Directors** • Act. President Director : Vera Ongyono • Director : Yoga Mulya • Director : Teddy Wishadi**

*) Served as Commissioner since June 25, 2024 and in the process of Fit and Proper Test by OJK
**) Served as Director since June 26, 2023 and in the process of Fit and Proper Test by OJK

PT BNI Life Insurance

Line of Business	Life Insurance Services
Business Profile	PT BNI Life Insurance ("BNI Life") is a subsidiary of BNI, engaged in in the life insurance sector, including life insurance business using Sharia principles. BNI Life offers a wide range of insurance products such as life, health, education, investment, pension and sharia insurance. BNI Life was originally established under the name of "PT Asuransi Jiwa BNI Jiwasraya" based on Deed No. 24 dated November 28, 1996 in Jakarta. On November 26, 2004, the Company changed its name to PT Asuransi Jiwa BNI Jiwasraya, which was endorsed by the Minister of Justice and Human Rights of the Republic of Indonesia through No. C-31600 HT.01.04.TH.2004 dated December 29, 2004. In accordance with the Articles of Association, the Company's scope of activities is conducting business in life insurance including life insurance business with Islamic principles. The Company obtained a license as a life insurance company based on the Ministry of Finance of the Republic of Indonesia Number 305/KMK.017/1997 dated July 7, 1997. The Company also obtained a license to open a branch office with Islamic principles based on the Ministry of Finance of the Republic of Indonesia No. KEP-186/KM.6/2004 dated May 19, 2004. In early May 2014, Sumitomo Life Insurance Company (Sumitomo Life), one of the largest insurance companies in Japan, officially became one of BNI Life's shareholders. The equity participation realization was IDR4.2 trillion with 40% share ownership in BNI Life. The strategic cooperation with Sumitomo Life Insurance accelerated business growth and provided huge space to gain future business opportunities. As proof of Sumitomo Life Insurance's seriousness in the BNI Life business development, they have placed representatives in BNI Life management as Commissioners, Directors, and professional experts. BNI Life business operations are supported by competent human resources in the insurance sector. Currently, BNI Life has 897 employees whose competencies that are continuously being developed to provide the best service to customers. BNI Life operates 1 (one) Service Office located at Menara BNI Pejompongan, Jl. Pejompongan Raya No. 5, Jakarta and and 6 (six) Service Points as follows: 1. Bandung : Jl. Burangrang No. 38, Lengkong; 2. Denpasar : Jl. Diponegoro No. 122; 3. Semarang : Jl. Sriwijaya No. 630, Candisari; 4. Surabaya : Gedung Graha Pangeran Lt. XI, Jl. Achmad Yani No. 286; 5. Palembang : Jl. Basuki Rahmat No.24B; 6. Yogyakarta : Jl. Laksda Adisucipto No.27, Gondokusuman. In 2024 BNI Life also opened an Operational Office located at Jalan KS Tubun Number 67, RT 002, RW 003, Petamburan Village, Tanah Abang District, Central Jakarta Administrative City. To maintain its commitment to business sustainability, BNI Life continues to improve the quality and improvement of business processes such as: 1. Improve business process digitalization including penetration of digital products & services to customers (e-polis, bPOS, Mobile DigiClaim); 2. Implement a sustainable employee development program; 3. Conducting CSR activities in the form of natural disaster relief, construction/repair of places of worship, social fund assistance, health assistance, and education fund assistance; 4. Implementation of efficiency programs in reducing plastic waste, paper usage and electricity & water consumption; 5. Conduct periodic organizational evaluation & fine-tuning; 6. Implementation of social responsibility, environmental and literacy programs; 7. Implementation of productive credit life insurance marketing program to MSMEs; 8. Implementation of finetuning to the organization by reviewing business processes and increasing digitization of sustainable financial activities.
Year of Establishment	1996
Total Assets in 2024	IDR26,675,991 million (unaudited)
Share Ownership	60.00%
Operational Status	Operating
Address	Centennial Tower 10th Fl., Jl. Gatot Subroto Kav. 24-25, Jakarta Selatan

Company Management	**Board of Commissioners** • Commissioner : Beby Lolita Indriani • Commissioner : Takafumi Igarashi • Independent Commissioner : Alwi Abdurrahman Shihab **Board of Directors** • Director (concurrently Acting President Director : Neny Asriany • Finance Director : Agung Turanto Sutarno • Director : Masaaki Fuse • Director : Motoharu Niijima **Sharia Supervisory Board** • Chairman : H. Agus Haryadi • Member : H. Utang Ranuwijaya • Member : Hj. Siti Haniatunnisa

BNI Remittance Ltd.

Line of Business	Remittance Services
Business Profile	BNI Remittance Limited was founded by BNI Hong Kong in 1997, originally named "BNI Nakertrans Ltd." The aim of its establishment was to help facilitate Indonesian Migrant Workers (PMI) who are in Hong Kong to make money transfers. Then, to further optimize its business activities and adapt to local authority regulations, in 2009, BNI Nakertrans Ltd officially joined as one of BNI's subsidiary companies and changed its name to BNI Remittance Ltd. BNI Remittance is currently registered as a Money Service Operator with register number 12-08-00768 and subject to Hong Kong Custom and Excise Department. To conduct its business, BNI Remittance manages outlets spread in 3 (three) areas of Hong Kong, namely the Keswick Main Office on Hong Kong Island, the Tsuen Wan Branch Office, and the Yuen Long Branch Office in the New Territories. In addition to services through these outlets, BNI Remittance collaborates with BNI in its financial inclusion program. This program provides financial access through digital services to make it easier for Indonesian Migrant Workers (PMI) in Hong Kong to carry out money transfer transactions. The existence of 8 (eight) BNI ATM machines in Hong Kong, provides customers more freedom to carry out financial transactions, with the same service features as ATM machines in Indonesia, including cash withdrawals, balance checks, transfers between BNI/other bank accounts, purchasing credit/tickets and bill payments. Since mid-2017, BNI Mobile Banking services can be activated directly from Hong Kong to further strengthen its digital services. In November 2024, BNI Remittance Ltd officially occupied a new office at Shop 3, G/F, Keswick Court, 3 Keswick Street, Causeway Bay, Hong Kong. The operation of this new office should make customers feel more comfortable in making transactions at BNI Remittance Ltd. In addition, in 2024, BNI Remittance Ltd. has also successfully organized an entrepreneurship class program for Indonesian Migrant Workers. In December 2024, this program produced 22 graduates, some of whom have succeeded in starting businesses in Indonesia as something to fall back on when they returned home for good.
Year of Establishment	1997
Total Assets in 2024	IDR8,636 million (unaudited)
Share Ownership	100.00%
Operational Status	Operating
Address	Shop 3, on GF, Keswick Court No. 3 Keswick Street, Causeway Bay Hong Kong
Company Management	**Board of Directors** Director : Indra Kusuma

PT Bank Hibank Indonesia

Line of Business	Banking
Business Profile	PT Bank Hibank Indonesia (hibank) previously named PT Bank Mayora, is a national private bank that operated since July 28, 1993 under a Commercial Bank business license in accordance with the Republic of Indonesia Minister of Finance Decree No. 719/KMK.017/1993 dated July 14, 1993, and became a Foreign Exchange Commercial Bank in 2013 based on BI Governor Decree No. 15/5/KEP.DPG/2013 dated May 7, 2013. Since May 18, 2022, hibank has officially been a subsidiary of the BNI Group through the Minister of Law and Human Rights (Menkumham) letter No. AHU-AH.01.03-0238599 concerning receipt of notification of changes to hibank's articles of association, as well as Menkumham Letter No. AHU-AH.01.09-0013352 concerning receipt of notification of changes to hibank's corporate data. The change of name from PT Bank Mayora to PT Bank Hibank Indonesia was in accordance with the decisions of the extraordinary general meetings of shareholders (EGMS) of PT Bank Mayora on January 6, 2023, and April 11, 2023. The change also received approval from the Minister of Law and Human Rights of the Republic of Indonesia on April 14 2023, as well as approval from members of the Board of Commissioners of the Financial Services Authority (FSA) on May 17, 2023. The choice of the name hibank represents an identity that is in line with the vision and mission and describes the friendly, simple, and reliable character of a digital bank for MSMEs. The name and logo change also emphasizes Hibank's strength and experience in the financial industry with the support of the BNI Group. In line with Hibank's vision to become the first digital-based MSME bank in Indonesia, Hibank will strengthen its role as an ecosystem orchestrator for MSMEs by providing a variety of integrated digital solutions to help MSMEs grow higher and sustainably. In 2024, hibank has introduced Financial Supply Chain Management (FSCM) services to facilitate financing needs in MSMEs in an integrated manner. Through financing services provided to distributors, principals and suppliers, hibank is committed to supporting the wider MSME business ecosystem. hibank's web-based FSCM service offers convenience for customers in the supply chain community to conduct transactions, loan repayments, and access real-time transaction reports.
Year of Establishment	1993
Total Assets in 2024	IDR17,798,871 Million (Unaudited)
Share Ownership	63.92%
Operational Status	Operating
Address	Rajawali Place 22nd-23rd Floor Jl. H.R. Rasuna Said Kav. B4, Setia Budi, Kecamatan Setiabudi, Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12910
Company Management	**Board of Commissioners** • President Commissioner : Rian Eriana Kaslan • Independent Commissioner : Rufina Tinawati Marianto • Independent Commissioner : Joys Djajanto **Board of Directors** • President Director : Jenny Wiriyanto • Director : Ricky Budiono • Director : Adi Syaf Putra • Director : Andi M. Andries • Director : Ir. Prihadiyanto

PT BNI Modal Ventura

Line of Business	Venture Capital
Business Profile	PT BNI Modal Ventura ("BNI Ventures" or "BNV") is a subsidiary of PT Bank Negara Indonesia (Persero), Tbk ("BNI") which operates in the venture capital industry and was established on April 12, 2022 based on Deed of Establishment No. 17 dated April 12, 2022. BNV received a capital investment of IDR 500.1 billion (five hundred billion one hundred million rupiah) on May 12, 2022. On April 19, 2022, the establishment of BNV received approval from the Minister of Law and Human Rights No. AHU-0027437.AH.01.01. 2022. BNV's Board of Directors and Board of Commissioners passed the Fit & Proper test (F&P) process from the Financial Services Authority (FSA) in December 2022, while the permit to carry out venture capital business activities was approved by the FSA on January 27, 2023 (based on Business License Decision Number KEP2/D.05/2023). BNI Ventures has obtained capital of IDR500.1 billion (five hundred billion Rupiah) on May 12, 2022. The composition of BNI Ventures consist of BNI with total ownership of 99.98% (an equivalent of 500,000 shares) while PT BNI Asset Management (BN-AM) holds the remaining 0.02% (an equivalent of 100 shares). Since obtaining its business license, BNI Ventures has been active in developing the startup industry ecosystem in Indonesia through various investment activities and its role as an ecosystem builder. Until the end of 2024, BNI Ventures has invested in 3 startups that have close synergy with BNI Group. In addition, BNI Ventures together with 4 other state-owned Corporate Ventures Capital (CVC), to form the Merah Putih Fund (MPF) which focuses on creating new Indonesian unicorn startups. Not only in investment activities, BNI Ventures is also active in synergy and innovation activities. Until the end of 2024 BNI Ventures has realized more than 6 synergies with BNI Group and manages BNV Arcade as an innovation platform for startups. In addition, BNI Ventures participates in various activities and programs in the industry such as seminars, talk shows and acts as a jury and assessment team in pitching sessions, speed dating, and business matchmaking.
Year of Establishment	2022
Total Assets in 2024	IDR517,250 million (unaudited)
Share Ownership	99.98% : PT Bank Negara Indonesia (Persero) Tbk 0.02% : PT BNI Asset Management
Operational Status	Operating
Address	Menara BNI 2nd Floor Jl. Pejompongan Raya No.7, Jakarta Pusat 10210
Company Management	**Board of Commissioners** • President Commissioner : Victor Erico Korompis • Independent Commissioner : Kartika Hendrawan **Board of Directors** • President Director : Mardianto E. Danusaputro • Director : Lugas Prancafitri

BRIEF INFORMATION ON INDIRECT SUBSIDIARIES

PT BNI ASSET MANAGEMENT

PT BNI Asset Management (BNI-AM) is a Financial Services Business in the Capital Markets industry. As a pioneer in the Investment Manager business in Indonesia, BNI-AM has license as an Investment Manager (IM) from the Capital Market Authority with license No. KEP-05/BL/MI/2011. This investment manager business was started on October 23, 1995 when it joined PT BNI Sekuritas. With the development of IM's business, on July 7, 2011 BNI-AM conducted a spin off from BNI Sekuritas as a Limited Liability Company.

BNI-AM provides investment management services for Third Party Funds through investment instruments in the form of complete Mutual Fund products and also Fund Management Contracts. The Mutual Fund products provided are Regular Mutual Fund products, Structured Mutual Funds, Special Mutual Funds and fund management tailored to the customer's Risk Appetite, and the period is adjusted to the customer's needs. BNI-AM also provides Investment Advisory services based on the license issued by OJK No: KEP-50/D.04/2017.

BNI-AM is part of the BNI conglomerate, one of the largest state-owned banks in Indonesia, which is included in the ranks of Indonesian public companies in the global class. When carrying out its business activities, BNI-AM's business grows in synergy with other BNI subsidiary companies, namely BNI Life, BNI Sekuritas, BNI Multifinance, BNI Remittance and Bank Hibank.

Supported by a strong understanding of investment in the Capital Market in Indonesia, and by having a professional Investment Team, BNI-AM is ready to help manage investors' funds through a variety of Mutual Fund investment products ranging from Open-end Mutual Funds, Protected Mutual Funds, and alternative investments such as Limited Participation Mutual Funds (RDPT), Asset Backed Securities Collective Investment Contracts (KIK-EBA), etc. BNI Asset Management Head Office is located at Centennial Tower Lt. 19, Jl. Gatot Subroto Kav. 24-25, South Jakarta.

PT BNI Asset Management's Board of Commissioners and Board of Directors composition is as follows:

Board of Commissioners	
President Commissioner/ Independent Commissioner	Eko Priyo Pratomo
Commissioner	Efrizal
Board of Directors	
President Director	Mungki Ariwibowo Adil
Director	Ade Yusriansyah
Director	Putut Endro Andanawarih

BNI SECURITIES PTE. LTD.

BNI Securities Pte. Ltd. ("BSPL"), a wholly-owned overseas subsidiary of PT BNI Sekuritas, was established in Singapore on March 22, 2021. BSPL was established to act as a liaison for the BNI Group in terms of international capital market activities, including establishing communication with investment-based global institutions.

BSPL has a Capital Markets Services license issued by the Monetary Authority of Singapore ("MAS") to carry out activities regulated by MAS, specifically in the capital market, including securities trading, with an initial focus on Fixed Income and other activities that are in line with the main business in Capital Markets and Sales & Trading.

In 2024, BSPL obtained an additional license from MAS in Advising on Corporate Finance.

The BSPL Board of Directors composition is as follows:

Board of Directors	
Executive Director	Chew Wen Yu, Edwin
Non Executive Director	Dipo Nugroho

BRIEF INFORMATION ON ASSOCIATED ENTITIES

PT PEMERINGKAT EFEK INDONESIA

PT Pemeringkat Efek Indonesia (PEFINDO) was established on December 21, 1993 on the initiative of the Capital Market Supervisory Agency/BAPEPAM (now the Financial Services Authority) and Bank Indonesia. As the first independent credit rating agency in Indonesia whose reliability has been well-tested, PEFINDO plays a role in analyzing the probability of default by a company or debt instrument in Indonesia.

Having actively contributed for more than 25 years in providing rating services in Indonesia, PEFINDO has rated more than 1,100 entities and capital market instruments including Bonds and Subordinated Bonds, Sukuk, Medium Term Securities (MTN), Securities Collective Investment Contracts Asset Backed (KIK-EBA), Mutual Funds, and Real Estate and Commercial Securities Investment Funds. In order to support the plan to issue regional bonds in Indonesia, since 2011 PEFINDO has also started conducting analysis and ranking of regional governments in Indonesia.

In addition to its rating services, PEFINDO also grows its income by actively conducting research on the Indonesian capital market and publishes its own indices, called PEFINDO25 and PEFINDO i-Grade, as well as its published products, which make up one of the benchmarks for consideration by capital market players in Indonesia, ind include the Indonesia Sectoral Review/ISR and Indonesia Rating Highlights/IRH and other products that provide information about the Indonesian capital market.

The number of shares owned by BNI in PEFINDO currently reaches 143 shares, equivalent to 0.122% ownership. The number of shares owned by BNI Sekuritas in PEFINDO currently reaches 15 shares, equivalent to 0.013% ownership, so the total share ownership of BNI Group in PEFINDO is 0.14%.

PT KUSTODIAN SENTRAL EFEK INDONESIA

PT Kustodian Sentral Efek Indonesia (KSEI) is a Depository and Settlement Institution (LPP) in the Indonesian Capital Market that provides central Custodian services and settlement of Securities transactions in an orderly, fair and efficient manner, as mandated by Law Number 8 of 1995 concerning Capital Markets. KSEI was established in Jakarta on December 23, 1997 and obtained a business license on November 11, 1998.

KSEI is a Self-Regulatory Organization (SRO), together with the Indonesia Stock Exchange (IDX) and the Indonesian Clearing and Guarantee Corporation (KPEI). KSEI started its operational activities for settlement of securities transactions by script on January 9, 1998, taking over a similar function from PT Kliring Depository Securities Indonesia (KDEI) as the Depository and Settlement Clearing House (LKPP). In 2000, KSEI together with other SROs implemented scripless trading and settlement of Securities transactions in the Indonesian Capital Market. This application is supported by KSEI's main system, namely The Central Depository and Book Entry Settlement System (C-BEST).

Seeing the very fast growth in transactions in the capital market, as well as increasingly advanced systems and technology developments, KSEI took the initiative to carry out continuous development of the C-BEST system through the new generation of C-BEST Next Generation (Next-G) on August 8, 2018. The launch of C-BEST Next-G reflects KSEI's effort to support the development of the Indonesian Capital Market, especially in terms of increasing the number of investors and increasing the number of transaction settlements. Efforts to increase investor confidence in investing were realized by KSEI in 2012 through the obligation to own a Single Investor Identification (SID). SID is a single identity number for investors that provides convenience in the investor identification process as well as forms the basis for other capital market developments, including the AKSes (Securities Ownership Reference) facility.

In 2016, KSEI implemented an integrated investment management system (S-INVEST), so that the Indonesian Capital Market has an integrated platform for the investment management industry. This breakthrough successfully led KSEI to win the award as The Best Central Securities Depository in Southeast Asia in 2016 according to Alpha Southeast Asia Magazine and made Indonesia the first country in the Southeast Asia region to have an integrated investment management system. Optimism and dedication has driven KSEI's enthusiasm to advance the Indonesian Capital Market. Armed with support from shareholders consisting of SROs (BEI and KPEI), Securities Companies, Custodian Banks and Securities Administration Bureaus, KSEI continues to moving forward and achieve the best performance through various initiatives. The initiatives and research applied continue to be developed on an ongoing basis to suit the latest industry trends and market needs.

Regarding its affiliation with BNI, KSEI is a minority subsidiary with direct participation, in which BNI began having ownership shares since September 24, 1998. The number of shares owned by BNI in KSEI currently reaches 60 shares, which is equivalent to 2.50% ownership. Regarding its affiliation with BNI, KSEI is a minority subsidiary with direct participation, in which BNI began to own shares since September 24, 1998. At present, the number of shares owned by BNI in KSEI reaches 60 shares, equivalent to 1.00% ownership. While the number of shares owned by BNI Sekuritas in KSEI reaches 90 shares, equivalent to 1.50% ownership, hence BNI Group's share ownership in KSEI is 2.50%.

PT KLIRING PENJAMINAN EFEK INDONESIA

PT Kliring Penjaminan Efek Indonesia (KPEI) was established in 1996 with the function as a Clearing and Guarantee Institution or Central Counterparty (CCP) for the Indonesian capital market. Based on Law Number 8 of 1995 concerning Capital Markets, the Government of the Republic of Indonesia then established KPEI as part of the Self-Regulatory Organization (SRO) of the Indonesian capital market together with PT Bursa Efek Indonesia (BEI) and PT Kustodian Sentral Efek Indonesia (KSEI).

As an entity, KPEI's business field is to organize clearing activities for Exchange transactions and transactions outside the Exchange, and to guarantee the settlement of Exchange transactions. Industrial and economic developments allow KPEI to develop its business activities by organizing other financial service support activities, in accordance with the approval of the Financial Services Authority (OJK) and referring to the prevailing laws and regulations. The year 2020 marks KPEI's footsteps in trying to expand its role as the central counterparty (CCP) of the OTC Derivative market, as well as to support the Government's program towards the development of financial markets with integrity, efficiency and transparency.

KPEI continuously improves the quality of services and products on an ongoing basis, and strives to innovate each type of service and product to meet the expectations of market participants. As an institutional development, KPEI also always strives to make infrastructure improvements, research and development, and implementation of international standard best practices as a Central Counterparty (CCP).

In relation to its affiliation with BNI, KPEI is a minority subsidiary company with direct investment, where BNI has carried out capital participation in KPEI since September 25, 2024. The number of shares owned by BNI in KPEI currently reaches 2,500 shares, which is equivalent to 1.11% ownership.

PT BANK MIZUHO INDONESIA

PT Bank Mizuho Indonesia ("Bank Mizuho") was originally established under the name PT Fuji Bank International Indonesia. Amendments to the Bank's Articles of Association included a change of name from PT Bank Fuji International Indonesia to PT Bank Mizuho Indonesia and changes to the Bank's capital and Board of Commissioners and Board of Directors composition, following the merger of PT Bank Dai-Ichi Kangyo Indonesia (BDKI) and PT Bank IBJ Indonesia (IBJ) with PT Fuji Bank International Indonesia which became effective on October 1, 2001.

Regarding its affiliation with BNI, Bank Mizuho is a minority subsidiary company with direct investment, in which BNI began to own shares since October 13, 2003. The number of shares owned by BNI in Bank Mizuho currently reaches 73,847 shares, or 1.00% ownership.

PT BANK SMBC INDONESIA Tbk

Bank BTPN is a foreign exchange bank resulting from a merger between PT Bank Tabungan Pensiunan Nasional Tbk (BTPN) and PT Bank Sumitomo Mitsui Indonesia (Bank Sumitomo Indonesia) which became effective on February 1, 2019.

In the disclosure of information submitted to the Indonesia Stock Exchange (IDX) on February 5, 2019, on February 1, 2019 there has been a change in the composition of the shareholders of PT Bank BTPN Tbk. Currently 91.05% of BTPN's shares are owned by Sumitomo Mitsui Banking Corporation, PT Bank Negara Indonesia Tbk (BBNI) with 0.11%, PT Bank Cental Asia Tbk (BBCA) with 1.03% and the Public with 7.81%.

Bank BTPN before the merger was a bank that focused on lending to the mass market (retail), while Bank Sumitomo Indonesia focused on the corporate

business segment. Following the merger between the two banks, Bank BTPN will become a universal bank with a more complete business and serves wider customer segments, from the mass market (retail) to corporate segments.

Regarding its affiliation with BNI, Bank BTPN is a minority subsidiary company with direct investment, in which BNI began to own shares on April 18, 2004. The number of shares owned by BNI in Bank BTPN is currently 12,007,137 shares, or 0. 11% ownership.

PT BANK SYARIAH INDONESIA Tbk

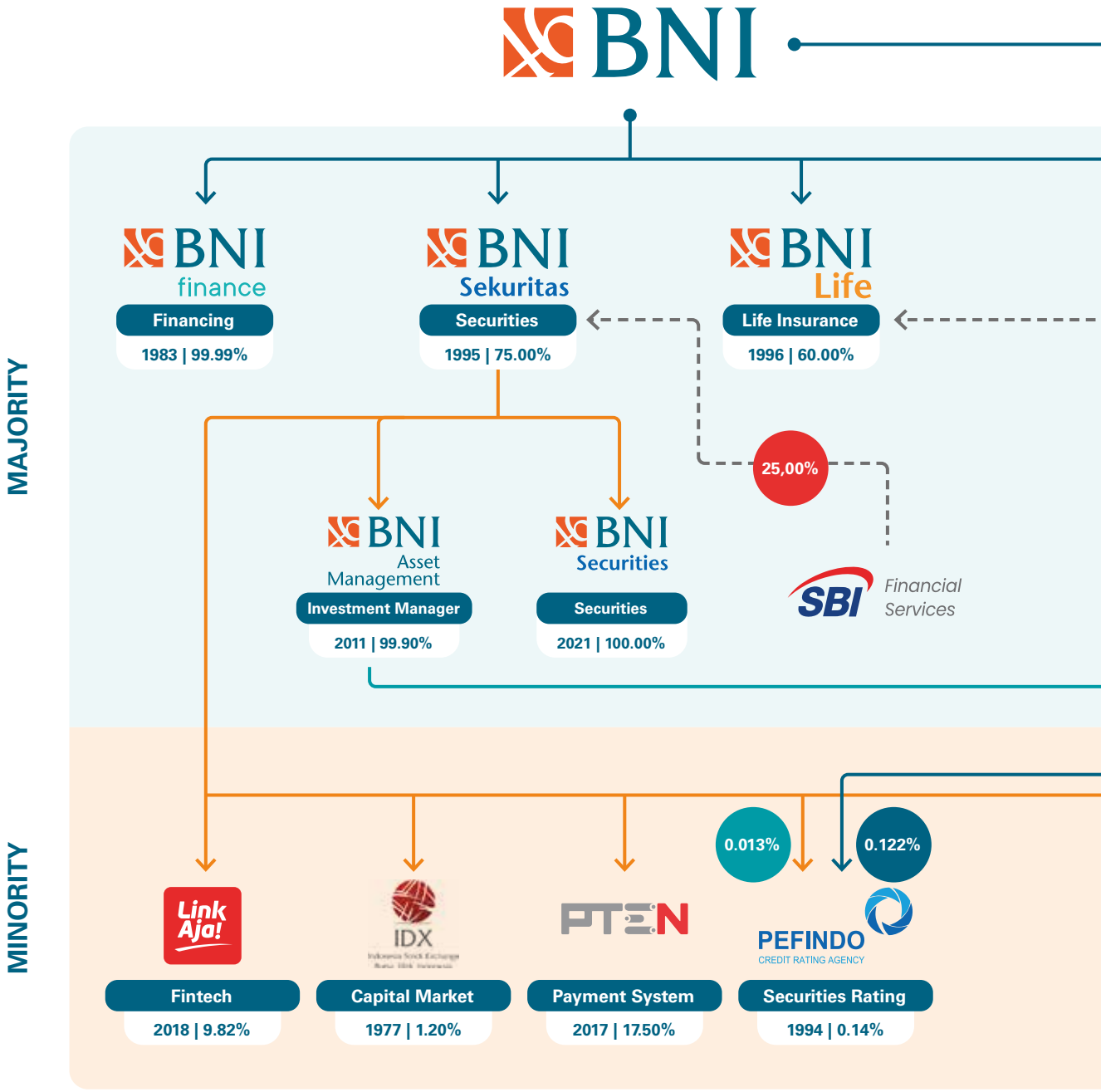
Bank Syariah Indonesia ("BSI") is a new entity born as a result of the merger of three state-owned sharia banks, namely Bank Syariah Mandiri, BNI Syariah, and BRI Syariah on February 1, 2021.

Given the history from the BNI side, Bank BNI Syariah was originally a Sharia Business Unit (UUS) within the BNI organization. Then in October 2009, BNI Management through the Extraordinary General Meeting of Shareholders (EGMS) approved a plan to spin off the Sharia Business Unit (UUS) to become a Sharia Commercial Bank (BUS) taking into account the increasingly advanced development of the Islamic banking business and the increasing demands of consumers who wanted a pure Islamic bank at that time. In June 2010, BNI management formalized the separation (spin-off) of BNI's Sharia Business Unit (UUS) into a new entity called PT Bank BNI Syariah.

To capture the growing opportunity for the Islamic economy in Indonesia, three state-owned Islamic banks, Bank Syariah Mandiri, BNI Syariah and BRI Syariah, decided to form a strategic alliance. On February 1, 2021, which coincides with 19 Jumadil Akhir 1442 H, marked the merger of Bank Syariah Mandiri, BNI Syariah and BRI Syariah into one entity, namely BSI. This merger will unite the advantages of these three Islamic Banks to present a more complete service, a wider reach, and have a better capital capacity. Supported by synergies with ther parent companies (Mandiri, BNI, BRI) and the Government commitment through the Ministry of BUMN, BSI was encouraged to compete at the global level.

As one of the controlling shareholders in BSI, the number of shares owned by BNI in BSI at the end of 2024 was 10,720,230,418 shares, or 23.24% ownership.

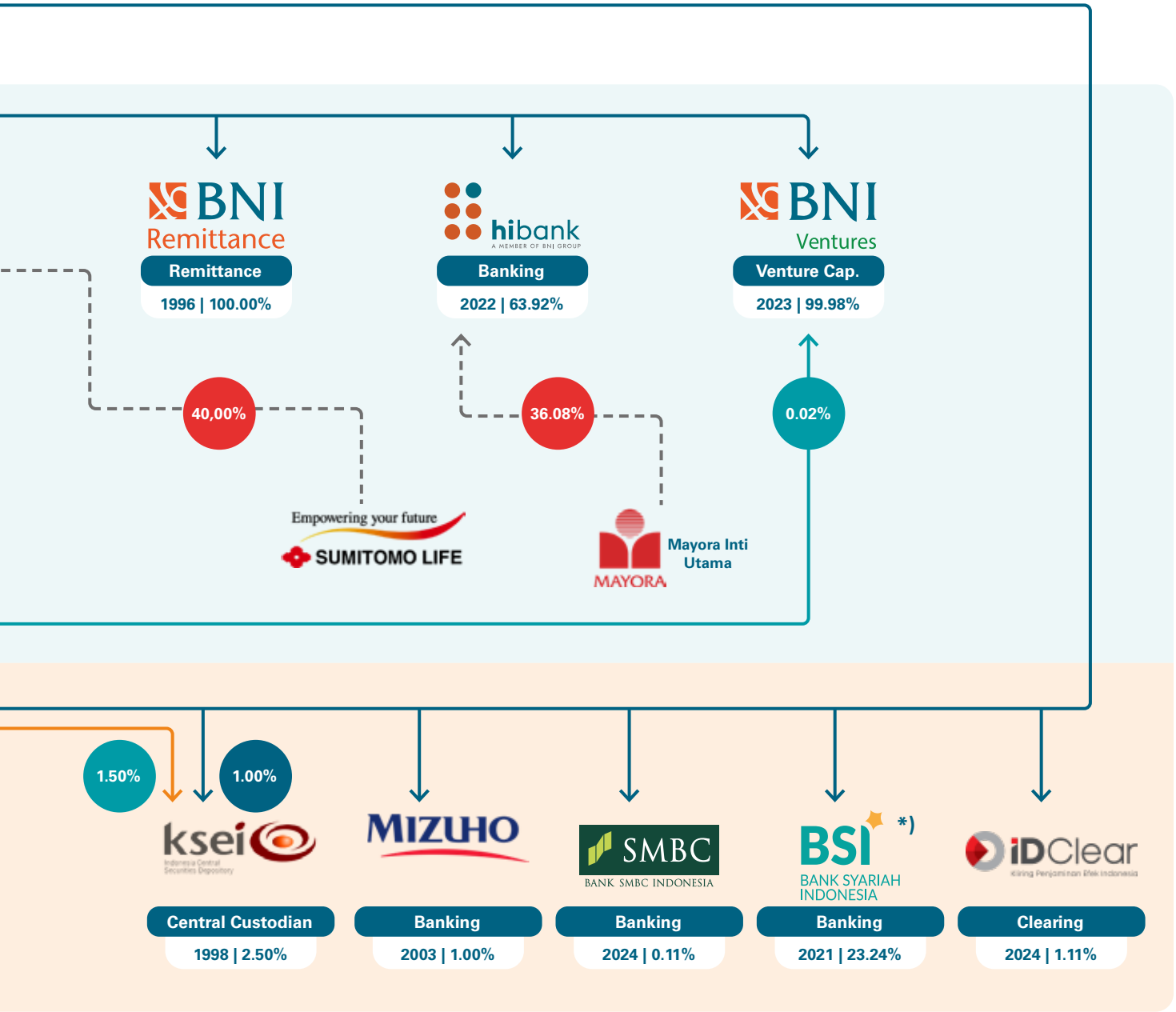
Corporate Group Structure



Notes:

- Investment by BNI
- Investment by BNI Sekuritas
- Investment by BNI Asset Management
- Investment by Strategic Partner

- Percentage of BNI Ownership
- Percentage of BNI Sekuritas Ownership
- Percentage of Strategic Partner Ownership



Notes:
*) In 2021, Bank BNI Syariah officially merged with 2 other Sharia Banks to become Bank Syariah Indonesia

Share Listing Chronology

INITIAL PUBLIC OFFERING (IPO)

On October 28, 1996, BNI undertook an initial public offering of 1,085,032,000 Class B shares with a par value per share of IDR500 (full amount) and offering price per share of IDR850 (full amount) to the public in Indonesia. The shares began trading on the Jakarta and Surabaya Stock Exchanges (currently Indonesia Stock Exchange or IDX) on November 25, 1996.

LIMITED PUBLIC OFFERING I

On June 30, 1999, BNI undertook a Limited Public Offering I ("LPO I") through the issuance of pre-emptive rights of 151,904,480,000 Class C shares with a par value per share of IDR25 (full amount). Each holder of 1 share was entitled to buy 35 new shares for IDR347.58 (full amount) per share. As a result of LPO I, BNI increased its capital by 683,916,500 Class C shares issued to the public on July 21, 1999 and the LPO I listed in the Jakarta and Surabaya Stock Exchanges (currently IDX). On April 7, 2000 and June 30, 2000, BNI also issued 151,220,563,500 Class C shares to the Government of Indonesia through the recapitalization program under the Government Regulation No. 52 year 1999.

RECAPITALIZATION

On March 30, 2000, the Ministry of Finance approved BNI's recapitalization amounting to IDR61.8 trillion, which was IDR9 trillion higher than the amount stated in the Government Regulation No. 52 year 1999. In connection with the increase in the recapitalization amount, which was approved in the Government Regulation No. 32 year 2000, BNI issued additional 44,946,404,500 Class C shares without pre-emptive rights.

On July 20, 2001, BNI's capital was reduced by 1,965,701,500 Class C shares in connection with the refund of excess recapitalization funds to the Government of Indonesia. The refund was approved by the shareholders at the Extraordinary General Shareholders' Meeting held on June 25, 2001.

LIMITED PUBLIC OFFERING II

On July 30, 2007, the Extraordinary General Shareholders' Meeting approved the issuance of up to 1,992,253,110 new Class C shares through Limited Public Offering II to shareholders with a par value per share of IDR375 (full amount).

Each owner of 20 old shares whose name was registered in the List of Shareholders of BNI as of August 9, 2007 at 16.00 WIB was entitled to 3 pre-emptive rights where each right entitles the owner to buy a new share at the price of IDR2,025 (full amount) per share. From the Limited Public Offering II, BNI raised IDR747,094 additional share capital and IDR3,287,218 additional paid-in capital and IDR195,280 shares issuance cost. The initial trading took place on August 13, 2007 at the Jakarta Stock Exchange and Surabaya Stock Exchange (currently IDX).

LIMITED PUBLIC OFFERING III

On November 25, 2010, at the Extraordinary General Shareholders' Meeting, the shareholders decided, among other matters, to increase the issued and paid-up capital through limited public offering with pre- emptive right (LPO III) to shareholders for the issuance of 3,374,715,948 new Class C shares with a par value per share of IDR375 (full amount). Such pre-emptive rights can be traded inside and outside the Indonesia Stock Exchange (IDX) starting December 10, 2010 until December 16, 2010, with consideration to the existing capital market regulation. From the LPO III, BNI obtained IDR1,265,519 additional share capital and IDR8,950,869 additional paid-in capital, net of shares issuance cost.

IMPLEMENTATION OF STOCK SPLIT

On September 19, 2023, the Extraordinary General Meeting of Shareholders (EGMS) approved a stock split and changes to Article 4 of the Company's Articles of Association concerning Company Capital. The Company carried out a stock split with a split ratio of 1 (one) old share into 2 (two) new shares (1:2), effective on October 6, 2023, so that the nominal value per Series A Dwiwarna and Series B share became IDR3,750 (three thousand seven hundred and fifty rupiah) and the nominal value per Series C Share became IDR187.50 (one hundred eighty seven point five zero rupiah).

NAME OF THE EXCHANGE WHERE THE COMPANY'S SHARES ARE LISTED

All BNI shares have been listed on the Indonesian Stock Exchange.

BNI Share Listing Chronology

Date	Description	Shares	Nominal Value	Offering Price	Number of Shares
Prior to IPO	-	-	-	-	-
November 1996	Initial Public Offering (IPO)	Series-A	@Rp500	-	1
		Series-B	@Rp500	850	4,340,127,999
	Total Capital issued and paid				**4,340,128,000**
June 1999	Rights Issue (1:35)	Series-A	@Rp500	-	1
		Series-B	@Rp500	850	4,340,127,999
		Series-C	@Rp25	347.58	151,904,480,000
	Total Capital issued and paid				**156,244,608,000**
June 2000	Issuance of new shares without pre-emptive rights	Series-A	@Rp500	-	1
		Series-B	@Rp500	850	4,340,127,999
		Series-C	@Rp25	347.58	196,850,884,500
	Total Capital issued and paid				**201,191,012,500**
July 2001	Repayment of excess amount in Government Bonds	Series-A	@Rp500	-	1
		Series-B	@Rp500	850	4,340,127,999
		Series-C	@Rp25	347.58	194,885,183,000
	Total Capital issued and paid				**199,225,311,000**
December 2003	Reverse Stock Split (15:1)	Series-A	@Rp7,500	-	1
		Series-B	@Rp7,500	12,750	289,341,866
		Series-C	@Rp375	5,213.7	12,992,345,533
	Total Capital issued and paid				**13,281,687,400**
August 13, 2007	Rights Issue (20:3)	Series-A	@Rp7,500	-	1
		Series-B	@Rp7,500	12,750	289,341,866
		Series-C	@Rp375	2,025	14,984,598,643
	Total Capital issued and paid				**15,273,940,510**
August 2010	Divestment of Indonesian State Shares in BNI ex green shoe	Series-A	@Rp7,500	-	1
		Series-B	@Rp7,500	12,750	289,341,866
		Series-C	@Rp375	2,025	14,984,598,643
	Total Capital issued and paid				**15,273,940,510**
December 10, 2010	Rights Issue (110,473:500,000)	Series-A	@Rp7,500	-	1
		Series-B	@Rp7,500	12,750	289,341,866
		Series-C	@Rp375	3,100	18,359,314,591
	Total Capital issued and paid				**18,648,656,458**
October 6, 2023	Stock Split (1:2)	Series-A	@Rp3,750	-	**1**
		Series-B	@Rp3,750	-	**578,683,733**
		Series-C	@187,50	-	**36,718,629,182**
	Total Capital issued and paid				**37,297,312,916**

Other Securities Listing Chronology

To support business growth, and to strengthen its capital with sufficient sources of funds with a good spread of tenors, BNI has issued several bonds denominated in Rupiah and foreign currencies. The bonds include BNI Global Bonds in 2012, followed by the issuance of BNI Sustainable Bonds in 2017 which realized funds of IDR3 trillion over a tenor of 5 (five) years. In 2021 BNI again issued a Global Tier 2 Capital Bonds and Additional Tier 1 Capital Bonds with funds raised of USD500,000,000 (full amount) and USD600,000,000 (full amount), respectively. In 2022, BNI also issued Green Bonds denominated in Rupiah with total funds collected of IDR5 trillion each with a tenor of 3 years and 5 years.

GLOBAL BOND 2012

BNI issued USD-denominated senior bonds (global bond) on April 27, 2012 with a principal amount of USD500,000,000 (full amount). The bonds were issued at a price of 98.89% with a coupon of 4.125% paid every 6 months. The bonds had a term of 5 years with a due date of April 27, 2017. The Bank has settled the entire principal amount of USD500.000.000 (full amount) at price 100,00%.

REGISTRATION OF SUSTAINABLE BONDS 2017

On June 22, 2017, BNI obtained an effective statement from FSA through letter number S-349/D.04/2017 to issue Sustainable Bonds I BNI Phase I 2017 ("Bonds"). The value of bonds issued amounted to IDR3,000,000,000,000 (full amount), for a period of 5 years, with a coupon of 8% per annum that will be paid quarterly. The BNI Bonds were issued on July 11, 2017 and listed on the Indonesia Stock Exchange on July 12, 2017. The first coupon payment to the bondholders was made on October 11, 2017.

Acting as Underwriters were PT BNI Sekuritas, PT Mandiri Sekuritas, PT Bahana Sekuritas, PT Danareksa Sekuritas, PT Indo Premier Sekuritas and PT BCA Sekuritas. Acting as Trustee was PT Bank Rakyat Indonesia (Persero) Tbk.

TIER 2 CAPITAL BOND 2021 (GLOBAL BOND)

BNI issued debt instruments with capital characteristics in the form of Tier II Capital Bonds, which were listed on the Singapore Exchange (SGX Listing) with a principal amount of USD500,000,000.00 with a write down feature that can be counted as a Tier 2 capital component through OJK letter No. S-64/PB.31/2021 dated March 31, 2021. The Tier 2 Capital Bond issuance is one of BNI's strategies for increasing the Bank's capital through Tier 2 Capital.

The Tier 2 Capital Bonds were offered at a fixed interest rate of 3.75% p.a. for a term of 5 (five) years. Acting as institutions and supporting professions for the issuance of the Tier 2 Capital Bonds were HSBC and Citi Group. The legal consultants were Ginting & Reksodiputro in association with Allen & Overy and HSBC acted as Trustee and Paying Agent. The bonds received a rating on long-term debt securities from Fitch Rating of BB, and from Moody's Rating of Ba2.

ADDITIONAL TIER 1 CAPITAL BOND 2021 (GLOBAL BOND)

BNI issued debt instruments with capital characteristics in the form of Additional Tier 1 Capital Bonds, which were listed on the Singapore Exchange (SGX Listing) with a principal amount of USD600,000,000 (full amount) with a write down feature that can be counted as a Tier 1 capital component through OJK letter No. S-210/ PB.31/2021 dated September 30, 2021.

The issuance of the Additional Tier 1 Capital Bond aimed to increase Tier 1 Capital, general funding, and improve the structure of long-term funds. Additional Tier 1 Capital Bonds were offered with a fixed interest rate of 4.30% p.a. perpetual term (no maturity) with call options after 5.5 (five and a half) years. Acting as institutions and supporting professions for the issuance of the Additional Tier 1 Capital Bonds were BNI Sekuritas, JP Morgan and UBS. The legal consultants used were Hadiputranto,

Hadinoto & Partners in association with Baker McKenzie and HSBC acted as Trustee and Paying Agent. The bonds received a rating on long-term debt securities from Moody's Rating of Ba3.

ENVIRONMENTAL BONDS (GREEN BONDS) BNI 2022

On June 10, 2022, BNI received an effective statement from FSA through letter no. S-93/D.04/2022 to issue Green Bond I PT Bank Negara Indonesia (Persero) TbkYear 2022 on June 21, 2022. The Principal Amount of Green Bonds issued is IDR5,000,000,000,000 (five trillion Rupiah) with Green Bond interest of 6.35% (six point three five percent) per year for series A and 6.85% (six point eight five percent) per year for series B. Green Bond I 2022 was offered at 100% (one hundred percent) of the principal amount of the bonds, with coupons paid quarterly, and listed on the Indonesia Stock Exchange (IDX) on June 22, 2022. The first coupon payment to bondholders was made on September 21, 2022.

The proceeds from the bond issuance, after deducting emission costs, will all be used by BNI to finance and refinance projects in the Environmentally Friendly Business Activities (KUBL) category, namely projects related to renewable energy, energy efficiency, processing waste into energy and waste management, sustainable use of natural resources and land use, conservation of terrestrial and aquatic biodiversity, environmentally friendly transportation, sustainable management of water and wastewater, climate change adaptation, environmentally sound buildings, and sustainable agriculture, taking into account OJK Regulation No. 60/POJK.04/2017 concerning Issuance and Requirements for Green Bonds.

Acting as Underwriters for the Issue were PT BNI Sekuritas, PT BCA Sekuritas, PT Mandiri Sekuritas, PT BRI Danareksa Sekuritas, PT CIMB Niaga Sekuritas, and PT Maybank Sekuritas. Acting as Trustee was PT Bank Mandiri (Persero) Tbk.

GLOBAL BOND 2024

BNI issued senior bonds (BNI Global Bond) denominated in US Dollars on April 5, 2024 amounting to USD 500,000,000 (full amount) which was listed on the Singapore Exchange (SGX Listing). BNI Global Bond 2024 was issued at a price of 100% with a coupon of 5.28% paid every 6 months (semi-annually). BNI Global Bond 2024 has a term of 5 (five) years and will mature on April 5, 2029.

The proceeds from the issuance of this Bond will be used for the company's general financing and funding needs. Acting as supporting institutions and professions in the issuance of the 2024 Global Bond are BNI Securities Pte Ltd, JP Morgan and Citi Group. The Legal Consultant used is Ginting & Reksodiputro which is associated with Allen & Overy Singapore. Then HSBC acts as Trustee and Paying Agent. The bonds have received a rating for long-term debt securities from S&P with a BBB rating and Fitch Rating with a BBB- rating.

NAME OF THE EXCHANGE WHERE THE COMPANY'S BONDS ARE LISTED

All BNI Rupiah-denominated Securities have been listed on the Indonesia Stock Exchange (IDX), while Forex-denominated Securities are listed on the Singapore Exchange.

BNI Bond Listing Chronology

Name of Security	Issue Date	Effective Date	Tenor	Currency	Number of Bonds	Offer Value	Maturity Date	Interest Rate	Payment Status	Securities Rating		Trustee
										2024	2023	
Global Bond	April 17, 2012	-	5 Years	USD	500,000,000	98.89	April 27, 2017	4.125% p.a	Paid	-	-	HSBC
BNI Sustainable Bonds I Phase I of 2017	July 11, 2017	June 22, 2017	5 Years	IDR	3,000,000,000,000	100.00	July 11, 2022	8.00% p.a	Paid	idAAA (Pefindo)	idAAA (Pefindo)	PT BRI (Persero)
BNI Tier 2 Capital Bond 2021	March 30, 2021	March 30, 2021	5 Years	USD	500,000,000	100.00	March 30, 2026	3.75%	Not Yet Paid	BB (Fitch) Ba2 (Moodys)	-	HSBC Corp Ltd.
BNI Additional Tier 1 Capital Bond 2021	September 24, 2021	September 24, 2021	Perpetual, Non Callable 5.5 Years	USD	600,000,000	100.00	March 24, 2027	4.30%	Not Yet Paid	Ba3 (Moodys)	-	HSBC Corp Ltd.
BNI Green Bond I of 2022	June 21, 2022	June 10, 2022	3 Years	IDR	4,000,000,000,000	100.00	June 21, 2025	6.35%	Not Yet Paid	idAAA (Pefindo)	-	PT Bank Mandiri (Persero) Tbk
BNI Green Bond I of 2022	June 21, 2022	June 10, 2022	5 Years	IDR	1,000,000,000,000	100.00	June 21, 2027	6.85%	Not Yet Paid	idAAA (Pefindo)	-	PT Bank Mandiri (Persero) Tbk
Global Bond 2024	April 05, 2024	April 05, 2024	5 Years	USD	500,000,000	100.00	April 05, 2029	5.28% p.a	Not Yet Paid	BBB (S&P) BBB- (Fitch)	-	HSBC Corp Ltd.

BOND INTEREST PAYMENT CHRONOLOGY

This Global Bond has an annual interest rate of 4.125% of the principal amount of the loan. Interest is paid by the Bank every 6 (six) months with the initial date of payment of the bond interest on October 29, 2012 and the last payment of the bond interest has been paid on maturity on April 27, 2017.

Global Bond Interest Payments Chronology

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	October 29, 2012	4.125%	Paid
2	April 29, 2013	4.125%	Paid
3	October 28, 2013	4.125%	Paid
4	April 28, 2014	4.125%	Paid
5	October 27, 2014	4.125%	Paid
6	April 27, 2015	4.125%	Paid
7	October 27, 2015	4.125%	Paid
8	April 27, 2016	4.125%	Paid
9	October 27, 2016	4.125%	Paid
10	April 27, 2017	4.125%	Paid

The Sustainable Bond I BNI Rupiah Phase I 2017 has an interest rate of 8% per annum which is paid periodically every 3 months with the following schedule:

Chronology of Sustainable Bond Interest Payments

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	October 11, 2017	8%	Paid
2	January 11, 2018	8%	Paid
3	April 11, 2018	8%	Paid
4	July 11, 2018	8%	Paid
5	October 11, 2018	8%	Paid
6	January 11, 2019	8%	Paid

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
7	April 11, 2019	8%	Paid
8	July 11, 2019	8%	Paid
9	October 11, 2019	8%	Paid
10	January 11, 2020	8%	Paid
11	April 11, 2020	8%	Paid
12	July 11, 2020	8%	Paid
13	October 11, 2020	8%	Paid
14	January 11, 2021	8%	Paid
15	April 11, 2021	8%	Paid
16	July 11, 2021	8%	Paid
17	October 11, 2021	8%	Paid
18	Januari 11, 2022	8%	Paid
19	April 11, 2022	8%	Paid
20	July 11, 2022	8%	Paid

BNI Tier 2 Capital Bond 2021 has an interest rate of 3.75% per annum, which is paid every 6 months with the first interest payment made on September 30, 2021 and ending on March 30, 2026 with the following schedule:

Tier 2 Capital Bond Interest Payments Chronology

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	September 30, 2021	3.75%	Paid
2	March 30, 2022	3.75%	Paid
3	September 30, 2023	3.75%	Paid
4	March 30, 2023	3.75%	Paid
5	September 30, 2023	3.75%	Paid
6	March 30, 2024	3.75%	Paid
7	September 30, 2024	3.75%	Paid
8	March 30, 2025	3.75%	Not Yet Paid
9	September 30, 2025	3.75%	Not Yet Paid
10	March 30, 2026	3.75%	Not Yet Paid

BNI Additional Tier 1 Capital Bond 2021 has an interest rate of 4.3% per annum with the first interest payment to be made on March 24, 2022 and ending on March 24, 2027, and is paid every 6 months with the following schedule:

Tier 1 Capital Bond Interest Payments Chronology

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	March 24, 2022	4.3%	Paid
2	September 24, 2022	4.3%	Paid
3	March 24, 2023	4.3%	Paid
4	September 24, 2023	4.3%	Paid
5	March 24, 2024	4.3%	Paid
6	September 24, 2024	4.3%	Paid
7	March 24, 2025	4.3%	Not Yet Paid
8	September 24, 2025	4.3%	Not Yet Paid
9	March 24, 2026	4.3%	Not Yet Paid
10	September 24, 2026	4.3%	Not Yet Paid
11	March 24, 2027	4.3%	Not Yet Paid

BNI Green Bond I Year 2022 has an interest rate of 6.35% per annum for a 3-year tenor and an interest rate of 6.85% for a 5-year tenor with the first interest payment being made on September 21, 2022 and ending on June 21, 2025 for a 3-year tenor and June 21, 2027 for a 5-year tenor, which will be paid periodically every 3 months with the following schedule:

Chronology of Interest Payment for 3-Year Tenor Green Bonds

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	September 21, 2022	6.35%	Paid
2	December 21, 2022	6.35%	Paid
3	March 21, 2023	6.35%	Paid
4	June 21, 2023	6.35%	Paid
5	September 21, 2023	6.35%	Paid
6	December 21, 2023	6.35%	Paid
7	March 21, 2024	6.35%	Paid
8	June 21, 2024	6.35%	Paid
9	September 21, 2024	6.35%	Paid
10	December 21, 2024	6.35%	Paid
11	March 21, 2025	6.35%	Not Yet Paid
12	June 21, 2025	6.35%	Not Yet Paid

Chronology of Interest Payment for 5-Year Tenor Green Bonds

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	September 21, 2022	6.85%	Paid
2	December 21, 2022	6.85%	Paid
3	March 21, 2023	6.85%	Paid
4	June 21, 2023	6.85%	Paid
5	September 21, 2023	6.85%	Paid
6	December 21, 2023	6.85%	Paid
7	March 21, 2024	6.85%	Paid
8	June 21, 2024	6.85%	Paid
9	September 21, 2024	6.85%	Paid
10	December 21, 2024	6.85%	Paid
11	March 21, 2025	6.85%	Not Yet Paid
12	June 21, 2025	6.85%	Not Yet Paid
13	September 21, 2025	6.85%	Not Yet Paid
14	December 21, 2025	6.85%	Not Yet Paid
15	March 21, 2026	6.85%	Not Yet Paid
16	June 21, 2026	6.85%	Not Yet Paid
17	September 21, 2026	6.85%	Not Yet Paid
18	December 21, 2026	6.85%	Not Yet Paid
19	March 21, 2027	6.85%	Not Yet Paid
20	June, 21 2027	6.85%	Not Yet Paid

Global Bond 2024 Interest Payments Chronology

BNI Global Bond 2024 has an interest rate of 5.28% per annum from bond principal. The interest payments will be disbursed semi-annually by the bank, with the initial payment scheduled for October 04, 2024 and the final interest payment scheduled for April 05, 2029. The payment schedule is as follows:

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	October 05, 2024	5.28%	Paid
2	April 05, 2025	5.28%	Not Yet Paid
3	October 05, 2025	5.28%	Not Yet Paid
4	April 05, 2026	5.28%	Not Yet Paid
5	October 05, 2026	5.28%	Not Yet Paid
6	April 05, 2027	5.28%	Not Yet Paid
7	October 05, 2027	5.28%	Not Yet Paid
8	April 05, 2028	5.28%	Not Yet Paid
9	October 05, 2028	5.28%	Not Yet Paid
10	April 05, 2029	5.28%	Not Yet Paid

RUPIAH SUBORDINATED MEDIUM TERM NOTES 2018

In 2018, BNI issued debt instruments with capital characteristics in the form of Medium Term Notes (MTN) through a limited offering under the name "BNI Subordinated MTN I Year 2018" with a write down feature that can be calculated as a capital component, and were recorded in the administrative supervision of the Financial Services Authority, with an effective date of June 8, 2018 and a total principal amount of IDR100 billion.

The Subordinated MTN were issued to comply with OJK Regulation No. 14/POJK.03/2017 Article 24 and Article 37 concerning the Recovery Plan, whereby systemic banks were required to have debt securities with capital characteristics no later than December 31, 2018.

The 2018 BNI Subordinated MTN I was offered with a fixed interest rate of 8.00% p.a. for a term of 5 (five) years. Acting as supporting institutions and professions for the issuance of the Subordinated MTN were BNI Sekuritas, Danareksa Sekuritas, and Mandiri Sekuritas. The legal consultant used was Hanafiah Ponggawa & Partners. The notary used was Ir. Nanette Cahyanie, SH. and PT Kustodian Sentral Efek Indonesia (KSEI) acted as Paying Agent.

In accordance with POJK No. 07/2017 and Regulation No.IX.C.11, for the issuance of these Bonds, BNI obtained a rating for its long-term debt securities from PT Pemeringkat Efek Indonesia ("Pefindo") for the period March 06, 2023 to August 10, 2023 in their letter No. RC-143/PEF-DIR/III/2023 dated March 6, 2023 with a rating of idAA (Double A) for BNI's 2018 Subordinated Medium Term Notes I. BNI rates its bonds annually so long as the obligations for the securities have not been paid off.

Chronology of BNI Medium Term Notes (MTN) Issuance

Description	Date of issue	Effective date	Tenor	Currency	Bond Amount	Bid Price	Due date	Interest Rate	Payment Status	Rating		Trustee
										2020	2019	
Subordinated MTN I 2018	August 10, 2018	August 10, 2018	5 Years	IDR	100,000,000,000	100.00%	August 10, 2023	8.00%	Paid	idAA (Pefindo)	idAA (Pefindo)	PT Bank Rakyat Indonesia (Persero)

MTN Interest Payments Chronology

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
1	November 10, 2018	8%	Paid
2	February 10, 2019	8%	Paid
3	May 10, 2019	8%	Paid
4	August 10, 2019	8%	Paid
5	November 10, 2019	8%	Paid
6	February 10, 2020	8%	Paid
7	May 10, 2020	8%	Paid
8	August, 10 2020	8%	Paid

Interest No.	Date of Bond Interest Payment	Interest (%)	Payment Status
9	November 10, 2020	8%	Paid
10	February 10, 2021	8%	Paid
11	May 10, 2021	8%	Paid
12	August 10, 2021	8%	Paid
13	November 10, 2021	8%	Paid
14	February 10, 2022	8%	Paid
15	May 10, 2022	8%	Paid
16	August 10, 2022	8%	Paid
17	November 10, 2022	8%	Paid
18	February 10, 2023	8%	Paid
19	May 10, 2023	8%	Paid
20	August 10, 2023	8%	Paid

In 2016, BNI conducted an NCD offering in two stages consisting of several series with the realization of the issuance of IDR5.22 trillion. In 2017, BNI again issued an NCD with the realization of the issuance of IDR2.7 trillion. In 2019 BNI issued NCD in three stages with the realization of the issuance of IDR4.34 trillion consisting of several series.

The Arrangers of the BNI Rupiah NCD issuance were BNI Sekuritas, Danareksa Sekuritas, Mandiri Sekuritas, and BCA Sekuritas. The notary was Fathiah Helmi, SE., PT Indonesian Central Securities Depository (KSEI) acted as a Paying Agent. The issuance of the NCD was a Bank strategy to increase Rupiah liquidity.

In 2020, BNI issued scripless Rupiah Negotiable Certificate of Deposit (NCD) in four series as follows:
1. Rupiah NCD BNI I Year 2020 Series A with an emission of IDR400 billion;
2. Rupiah NCD BNI I Year 2020 Series B with an emission of IDR580 billion;
3. Rupiah NCD BNI I Year 2020 Series C with an emission of IDR50 billion;
4. Rupiah NCD BNI I Year 2020 Series D with an emission of IDR360 billion.

On December 8, 2022, BNI again issued scripless Negotiable Certificates of Deposit (NCD), denominated in Rupiah and USD. The NCDs issued were as follows:
1. NCD Rupiah BNI Year 2022 with an issue value of IDR2.5 trillion in 3 (three) series, namely:
   a. BNI Rupiah NCD Year 2022 Series A with an issue value of IDR1 trillion;
   b. BNI Rupiah NCD Year 2022 Series B with an issue value of IDR500 billion;
   c. BNI Rupiah NCD Year 2022 Series C with an issue value of IDR1 trillion.
2. NCD US Dollar BNI Year 2022 with an emission value of USD31.5 million.

The arrangers for the BNI NCD issuance were BNI Sekuritas, BCA Sekuritas, and Trimegah Sekuritas Indonesia, with PT Kustodian Sentral Efek Indonesia (KSEI) acting as Paying Agent. The NCD issuance is the Bank's strategy for credit expansion in the framework of development.

In addition, BNI also issued a scripless USD Global Certificate of Deposit (CD) through the New York Overseas Office (KLN) in January 2020. BNI through the New York KCLN became the first Indonesian Bank to issue CDs denominated in USD as a short-term investment product on the global market. The selected Arrangers for this CD issuance were Bank DBS, Citibank as Issuing & Paying Agent (IPA), and there were also 11 (eleven) Dealers in this issuance, namely: Citibank, Credit Suisse, BNP Paribas, DBS, HSBC, Mizuho, MUFG, SMBC Nikko, ANZ, UOB, and Credit Agricole. BNI also reissued USD scripless Global Certificate of Deposit (CD) through the New York Overseas Office (KLN) in September 2022.

NAME OF THE EXCHANGES WHERE THE COMPANY'S NCD ARE LISTED

All BNI NCDs have been listed on the Indonesia Stock Exchange (IDX).

Chronology of Negotiable Certificate of Deposit (NCD) Issuance

Description	Issue Date	Effective Date	Tenor	Currency	Value (million)	Maturity Date	Dicount Rate	Payment Status
NCD BNI Year 2016								
NCD Phase I Series A	June 16, 2016	-	6 Month	IDR	390,000	December 16, 2016	7.00%	Paid
NCD Phase I Series B		-	9 Month		20,000	March 16, 2017	7.20%	Paid
NCD I Series C		-	370 Days		42,000	June 23, 2017	7.55%	Paid
NCD I Series D		-	18 Month		415,000	December 15, 2017	7.75%	Paid
NCD I Series E		-	24 Month		1,231,000	June 15, 2018	8.25%	Paid
NCD I Series F		-	36 Month		925,000	June 14, 2019	8.40%	Paid
NCD II Series A	September 27, 2016	-	370 Days	IDR	225,000	October 2, 2017	7.20%	Paid
NCD II Series B		-	18 Month		390,000	March 26, 2018	7.60%	Paid
NCD II Series C		-	24 Month		770,000	September 26, 2018	7.90%	Paid
NCD II Series D		-	36 Month		815,000	September 26, 2019	8.10%	Paid
NCD BNI Year 2017								
NCD BNI Year 2017 Series A	March 10, 2017	-	370 Days	IDR	2,195,000	March 15, 2018	7.55%	Paid
NCD BNI Year 2017 Series B		-	18 Month		350,000	September 3, 2018	7.90%	Paid
NCD BNI Year 2017 Series C		-	24 Month		150,000	Februari 28, 2019	8.05%	Paid
NCD BNI Year 2017 Series D		-	36 Month		5,000	February 24, 2020	8.35%	Paid
NCD BNI Year 2019								
NCD BNI I Year 2019 Series A	March 28, 2019	-	3 Month	IDR	60,000	July 2, 2019	7.30%	Paid
NCD BNI I Year 2019 Series B		-	6 Month		140,000	September 24, 2019	7.58%	Paid
NCD BNI I Year 2019 Series C		-	9 Month		150,000	December 20, 2019	7.68%	Paid
NCD BNI I Year 2019 Series D		-	370 Days		600,000	April 1, 2020	7.77%	Paid
NCD BNI II Year 2019 Series A	June 28, 2019	-	3 Month		110,000	September 27, 2019	7.17%	Paid
NCD BNI II Year 2019 Series B		-	6 Month		150,000	December 20, 2019	7.50%	Paid
NCD BNI II Year 2019 Series C		-	9 Month		100,000	March 20, 2020	7.59%	Paid
NCD BNI II Year 2019 Series D		-	370 Days		640,000	July 2, 2020	7.62%	Paid
NCD BNI III Year 2019 Series A	September 25, 2019	-	3 Month		430,000	January 3, 2020	6.306%	Paid
NCD BNI III Year 2019 Series B		-	6 Month		250,000	April 1, 2020	6.50%	Paid
NCD BNI III Year 2019 Series C		-	9 Month		50,000	July 1, 2020	6.599%	Paid
NCD BNI III Year 2019 Series D		-	372 Days		1,600,000	October 1, 2020	6.698%	Paid
NCD BNI III Year 2019 Series E		-	372 Days		60,000	October 1, 2020	6.798%	Paid
NCD BNI Year 2020								
NCD BNI I Year 2020 Series A	May 12, 2020	-	3 Month	IDR	400,000	August 10, 2020	5.40%	Paid
NCD BNI I Year 2020 Series B		-	6 Month		580,000	November 9, 2020	5.60%	Paid
NCD BNI I Year 2020 Series C		-	9 Month		50,000	February 8, 2021	5.70%	Paid
NCD BNI I Year 2020 Series D		-	360 Days		360,000	May 7, 2021	5.80%	Paid
NCD BNI Year 2022								
NCD Rupiah BNI Year 2022 Series A	December 8, 2022	-	180 Days	IDR	1,000,000	June 6, 2023	5.90%	Paid
NCD Rupiah BNI Year 2022 Series B	December 8, 2022	-	271 Days	IDR	500,000	September 5, 2023	6.00%	Paid
NCD Rupiah BNI Year 2022 Series C	December 8, 2022	-	365 Days	IDR	1,000,000	December 8, 2023	6.20%	Paid
NCD Valas BNI Year 2022	December 8, 2022	-	180 Days	USD	31.5	June 6, 2023	4.25%	Paid

Other BNI Securities Issuance Chronology (Global Certificate of Deposit)

Description	Issue Date	Effective Date	Tenor
Global CD BNI			
Zero Coupon (No Interest)			
CD BNI January 2020 USD CD – Mizuho	January 13, 2020	January 17, 2020	188 days
CD BNI January 2020 USD CD – Mizuho	January 13, 2020	January 17, 2020	273 days
CD BNI January 2020 USD CD – Mizuho	January 22, 2020	January 30, 2020	182 days
CD BNI January 2020 USD CD - Mizuho	January 22, 2020	January 30, 2020	274 days
CD BNI February 2020 USD CD – BNP Paribas	January 28, 2020	February 4, 2020	184 days
CD BNI February 2020 USD CD – BNP Paribas	January 28, 2020	February 4, 2020	353 days
CD BNI February 2020 USD CD – BNP Paribas	February 4, 2020	February 11, 2020	184 days
CD BNI February 2020 USD CD – BNP Paribas	February 4, 2020	February 11, 2020	353 days
CD BNI February 2020 USD CD – BNP Paribas	February 5, 2020	February 12, 2020	90 days
CD BNI February 2020 USD CD -MUFG	February 5, 2020	February 12, 2020	182 days
CD BNI February 2020 USD CD – BNP Paribas	February 12, 2020	February 19, 2020	182 days
CD BNI February 2020 USD CD – BNP Paribas	February 12, 2020	February 19, 2020	355 days
CD BNI February 2020 USD CD – MUFG	February 13, 2020	February 21, 2020	355 days
CD BNI February 2020 USD CD – Mizuho	February 14, 2020	February 21, 2020	355 days
CD BNI March 2020 USD CD – BNP Paribas	March 3, 2020	March 10, 2020	184 days
CD BNI March 2020 USD CD – MUFG	March 10, 2020	March 17, 2020	184 days
CD BNI March 2020 USD CD – Mizuho	March 17, 2020	March 20, 2020	188 days
CD BNI July 2020 USD CD – MUFG	July 9, 2020	July 15, 2020	184 days
CD BNI July 2020 USD CD – MUFG	July 9, 2020	July 14, 2020	184 days
CD BNI August 2020 USD CD – MUFG	August 25, 2020	August 28, 2020	92 days
CD BNI November 2020 USD CD – MUFG	November 9, 2020	November 17, 2020	181 days
CD BNI November 2020 USD CD – MUFG	November 17, 2020	November 20, 2020	188 days
CD BNI November 2020 USD CD – MUFG	November 17, 2020	November 20, 2020	188 days
CD BNI January 2021 USD CD – MUFG	January 21, 2021	January 28, 2021	355 days
CD BNI December 2022 USD CD – MUFG	December 16, 2022	December 22, 2022	186 days
CD BNI January 2023 USD CD - DBS	January 18, 2023	January 26, 2023	175 days
CD BNI January 2023 USD CD - Credit Agricole	January 27, 2023	February 03, 2023	89 days
CD BNI March 2023 USD CD - MUFG	March 08, 2023	March15, 2023	184 days
CD BNI March 2023 USD CD - DBS	March 09, 2023	March 16, 2023	182 days
CD BNI October 2023 USD CD - Credit Agricole	October 11, 2023	October 18, 2023	355 days
CD BNI October 2023 USD CD - DBS	October 12, 2023	October 18, 2023	355 days
Fixed Coupon (With Interest)			
CD BNI January 2020 USD CD – MUFG	January 21, 2020	January 28, 2020	91 days
CD BNI February 2020 USD CD - MUFG	February 03, 2020	February 10, 2020	274 days
CD BNI March 2020 USD CD - MUFG	March 3, 2020	March 10, 2020	92 days
CD BNI June 2020 USD CD - HSBC	June 09, 2020	June 17, 2020	91 days
CD BNI September 2020 USD CD – Credit Agricole	September 1, 2020	September 10, 2020	91 days
CD BNI November 2020 USD CD – Credit Agricole	November 6, 2020	November 13, 2020	91 days
CD BNI September 2020 USD CD – Mizuho	December 3, 2020	December 10, 2020	90 days
CD BNI September 2022 USD CD – MUFG	September 22, 2022	September 28, 2022	182 days
CD BNI January 2023 USD CD - Credit Agricole	January 27, 2023	February 03, 2023	89 days
CD BNI October 2023 USD CD - DBS	October 12, 2023	October 18, 2023	355 days
CD BNI October 2023 USD CD – Credit Agricole	October 11, 2023	October 18, 2023	355 days
CD BNI November 2024 USD CD – Credit Agricole	November 22, 2024	December 02, 2024	354 days

	Currency	Value (million)	Maturity Date	Discount Rate	Payment Status
	USD	4,000,000	July 23, 2020	2.35%	Paid
	USD	4,000,000	October 16, 2020	2.40%	Paid
	USD	2,000,000	July 30, 2020	2.35%	Paid
	USD	2,000,000	October 30, 2020	2.40%	Paid
	USD	6,000,000	August 6, 2020	2.35%	Paid
	USD	2,000,000	January 22, 2021	2.50%	Paid
	USD	9,800,000	August 13, 2020	2.40%	Paid
	USD	4,700,000	January 29, 2021	2.55%	Paid
	USD	9,100,000	May 12, 2020	2.40%	Paid
	USD	35,000,000	August 12, 2020	2.58%	Paid
	USD	4,100,000	August 19, 2020	2.40%	Paid
	USD	1,500,000	February 08, 2021	2.50%	Paid
	USD	15,000,000	February 10, 2021	2.55%	Paid
	USD	5,000,000	February 10, 2021	2.55%	Paid
	USD	4,800,000	January 14, 2021	1.75%	Paid
	USD	4,000,000	September 17, 2020	1.40%	Paid
	USD	4,400,000	September 24, 2020	1.45%	Paid
	USD	15,000,000	January 15, 2021	1.15%	Paid
	USD	23,200,000	January 14, 2021	1.15%	Paid
	USD	12,700,000	November 28, 2020	0.90%	Paid
	USD	25,000,000	May 17, 2021	0.95%	Paid
	USD	18,000,000	May 27, 2021	0.95%	Paid
	USD	25,000,000	May 27, 2021	0.95%	Paid
	USD	50,000,000	January 18, 2022	1.10%	Paid
	USD	18,600,000	June 26, 2023	5.45%	Paid
	USD	20,000,000	July 20, 2023	5.58%	Paid
	USD	54,000,000	May 03, 2023	5.40%	Paid
	USD	50,000,000	September 15, 2023	5.95%	Paid
	USD	23,500,000	September 14, 2023	5.95%	Paid
	USD	35,000,000	October 07, 2024	6.05%	Paid
	USD	40,000,000	October 07, 2024	6.07%	Paid
	USD	28,000,000	April 28, 2020	2.30%	Paid
	USD	74,200,000	November 10, 2020	2.33%	Paid
	USD	72,600,000	June 10, 2020	1.68%	Paid
	USD	122,600,000	September 16, 2020	0.685%	Paid
	USD	138,000,000	December 10, 2020	0.75%	Paid
	USD	32,200,000	February 12, 2021	0.69%	Paid
	USD	50,000,000	March 10, 2021	0.695%	Paid
	USD	60,000,000	December 28, 2022	4.00%	Paid
	USD	94,000,000	December 29, 2022	4.00%	Paid
	USD	40,000,000	October 07, 2024	6.07%	Paid
	USD	35,000,000	October 07, 2024	6.05%	Paid
	USD	50,000,000	November 21, 2025	4.92%	Not yet Paid

Information on Public Accountants, Public Accounting Firms, and Networks/ Associations/Alliances [ACGS C.6.1, C.6.2]

KAP Name	KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner and a member firm of the PricewaterhouseCoopers)
KAP Address	Jimmy Pangestu S.E., CPA
Alamat KAP	WTC 3, Jl. Jend. Sudirman Kav. 29-31, Jakarta 12920 – INDONESIA Tel. : (62-21) 50992901/31192901 Fax. : (62-21) 52905555/52905050 Website : www.pwc.com/id
KAP Assignment Period	4 (Four) Years
AP Assignment Period	4 (Four) Years
Audit Services	Consolidated Financial Report (including Subsidiaries and Overseas Offices), PUMK Report, and DPLK Report
Non-Audit Services	Agreed Upon Procedures (AUP) of Custodian Services, PSA 62, BOD KPI, Aggregation Performance Report for BUMN and Other Non Assurance Services.
Audit Fee	IDR31,373,863,603
Non-Audit Fee	IDR18,431,530,701

Capital Market Supporting Institutions and/or Professionals

Stock Trading and Listing	**PT Bursa Efek Indonesia** Gedung Bursa Efek Indonesia, Tower 1 Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190, Indonesia Tel. : (62-21) 5150515 Fax. : (62-21) 5154153 Website : www.idx.co.id E-mail : listing@idx.co.id
	Singapore Exchange Regulation Pte. Ltd. 11 North BuonaVista Drive, #06-07 The Metropolis Tower 2, Singapore Tel. : +65 6236 8888 Website : sgx.com E-mail : asksgx@sgx.com
Legal Consultant	**Ginting & Reksodiputro** The Energy Building, 15th Floor SCBD Lot 11A, Jl. Jend. Sudirman Kav. 52-53, Jakarta 12190 Tel. : 021 – 2995 1700 Fax. : 021 – 2995 1799 E-mail : indonesia@allenovery.com; daniel.ginting@allenovery.com Website : www.allenovery.com
	Hadiputranto, Hadinoto & Partners Pacific Century Place, Lv 35 SCBD Lot 10, Jl. Jend. Sudirman Kav 52-53 Jakarta 12190, Indonesia Tel. : 021 – 2960 8888 Fax. : 021 – 2960 8999 Website : www.hhp.co.id
	Hanafiah Ponggawa & Partners Wisma 46 – Kota BNI, 32nd and 41st Floor Main Reception, Jl. Jend. Sudirman Kav.1, Jakarta, 10220, Indonesia Tel. : +62 21 5701837 Fax. : +62 21 5701835 Website : https://dentons.hprplawyers.com

Securities Administration Bureau	**PT Datindo Entrycom** Jl. Hayam Wuruk No. 28, Jakarta 10120 Tel. : (62-21) 3508077 Website : www.datindo.com E-mail : corporatesecretary@datindo.com
Securities Rating Agency	**Standard & Poor's** 30 Cecil Street Prudential Tower 17th Floor Singapore 049712 Tel. : (65) 6438 2881 Website : www.standardandpoors.com
	Moody's Investors Service Singapore Pte. Ltd 50 Raffles Place #23-06 Singapore Land Tower, Singapore, 048623 Tel. : (+65) 6398 8300 Website : www.moodys.com
	PT Fitch Ratings Indonesia DBS Bank Tower, 24th Fl Suite 2403 Jl. Prof. Dr. Satrio Kav 3-5 Jakarta 12940 Tel. : (62-21) 2988 6800 Fax. : (62-21) 2988 6822 Website : www.fitchratings.com
	PT Pemeringkat Efek Indonesia (Pefindo) Equity Tower 30th Fl SCBD Lot 9 Jl. Jenderal Sudirman Kav.52-53 Jakarta 12190 Tel. : (62-21) 509 684 69 Fax. : (62-21) 509 684 68 Website : www.pefindo.com
Custodian	**PT Kustodian Sentral Efek Indonesia** Gedung Bursa Efek Indonesia, Tower 1, 5th Fl Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190, Indonesia Tel. : (62-21) 515 2855 Fax. : (62-21) 5299 1199 Website : www.ksei.co.id E-mail : helpdesk@ksei.co.id
Trustee	**PT Bank Mandiri (Persero) Tbk.** Plaza Mandiri Jl. Jend. Gatot Subroto Kav. 36-38, Jakarta 12190 Tel. : (62-21) 526 5045; 526 5095 Fax. : (62-21) 527 4477; 527 5577 Fax. : (62-21) 5752444
	The Hongkong and Shanghai Banking Corporation Limited Issuer Services, L24 HSBC Main Building, No.1 Queen's Road Central, Hong Kong Web : www.hsbc.com.hk
Notary	**Ashoya Ratam, S.H., M.Kn** Notaris & PPAT Kota Administrasi Jakarta Selatan Jl. Suryo No. 54, Kebayoran Baru Jakarta 12180 Tel. : (021) 2923 6060 Fax. : (021) 2923 6070 *E-mail* : notaris@ashoyaratam.com
Tax Consultant	**PB Taxand** Menara Imperium 27th Fl Jl. H.R. Rasuna Said Kav.1 Jakarta 12980 Tel. : (021) 835 6363 Fax. : (021) 8379 3939 Website : www.pbtaxand.com
Bond Allotment KAP	**Doli, Bambang, Sulistiyanto, Dadang & Ali Registered Public Accountants** Menara Kuningan 11th Fl Jl. H.R. Rasuna Said Blok X-7 Kav.5 Jakarta 12940 Tel. : (021) 5790 3548 Fax. : (021) 5790 3548

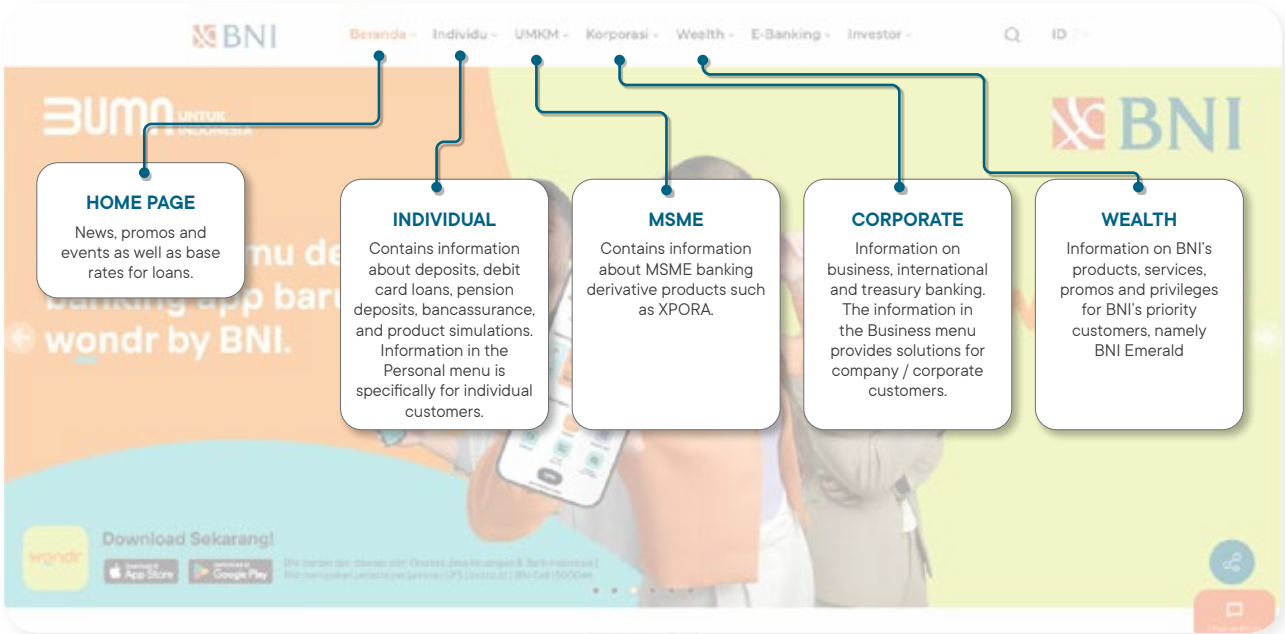
Environmental Expert Consultant	**Sustainalytics US Inc.** Four World Trade Center, Floor 48, 150 Greenwich Street New York, 10007 United States Tel. : (+65) 6329 7596 (APAC) Website : www.sustainalytics.com
Arranger	**The Hongkong and Shanghai Banking Corporation Limited** HSBC Main Building, 1 Queen's Road Central, Hong Kong Tel. : (+852) 2748 8288 Website : www.hsbc.com.hk
	Citigroup Global Markets Limited Citigroup Centre, Canada Square Canary Wharf London E14 5LB United Kingdom Tel. : (020) 7986 4000 Website : www.citigroup.com
	PT. BNI Sekuritas Sudirman Plaza, Indofood Tower 16th Floor Jl. Jend. Sudirman, Kav 76-78 Jakarta 12910, Indonesia Tel. : (021) 2554 3946 Fax. : (021) 5793 5831 Website : www.bnisekuritas.co.id
	J.P. MORGAN SECURITIES PLC 88 Market Street, 26th Floor, CapitaSpring, Singapore 048948 Tel. : +65 6882 2913 M : +65 8518 7697
	UBS Investment Bank Sequis Tower Level 22 unit 22-1, Jl. Jend Sudirman Kav.71 SCBD Lot 11B, Jakarta 12190 Tel. : +622125547000
	BNI Securities Pte. Ltd BNI Tower 30 Raffles Place #26-01 Singapore 048622 Website : https://bnisecurities.com.sg E-mail : corporate.secretary@bnisecurities.com.sg

Information Accessible on the BNI Website [ACGS B.5.1, C.7.2]

BNI has an official website, namely www.bni.co.id, developed by adhering to the OJK Regulation No. 8/POJK.04/2015 concerning the Websites of Issuers or Public Companies. The website is accessible to the general public in both Indonesian and English. It reflects BNI's commitment to complying with Law No. 8 of 1995 on Capital Markets and advancing the principles of Good Corporate Governance (GCG), specifically for shareholders, customers, the community, the government, and other stakeholders.



In detail, the BNI website contains the following information:



1. Information on the BNI website is updated regularly with current and up-to-date information.
2. General information about BNI disclosed on the BNI website includes:
   a. Name, address, and contact details of the head office and/or representative office of the Issuer or Public Company; including telephone number, fax number, and email address; [ACGS C.10.1]
   b. Brief history of the Issuer or Public Company;
   c. Organizational structure of the Issuer or Public Company;
   d. Company awards;
   e. Ownership structure of the Issuer or public company, including:
      - Description of the names of shareholders and their percentage of ownership at the end of each month;
      - Information regarding the main and controlling shareholders of the Issuer or Public Company, both directly and indirectly, down to individual owners presented in the form of a scheme or diagram; and
      - Name of subsidiary, associate company, joint venture company where the Issuer or Public Company has joint control of the entity, along with the percentage of share ownership, business field, and operating status of the company.
   f. Profile of the Board of Directors, Board of Commissioners, Committee, and Corporate Secretary, including:
      - Photo;
      - Name;
      - Job history, including concurrent positions;
      - Educational history;
      - Affiliation of members of the Board of Directors and members of the Board of Commissioners with other members of the Board of Directors and/or members of the Board of Commissioners and shareholders.
   g. Name and address
      - Public Accountant who audited the financial statements of the Issuer or Public Company in the current year;
      - Credit Rating Agency;
      - Trustee; and
      - Securities Administration Bureau.
   h. Articles of Association Document [ACGS C.9.6]
3. Information for Investors disclosed on the BNI website includes:
   a. Public Offering Prospectus;
   b. Annual report, for the last 5 (five) fiscal years; and [ACGS C.9.3]
   c. Financial Information, which includes:
      - Annual financial report, for the last 5 (five) fiscal years; [ACGS C.9.1]
      - Quarterly financial report, for the last 5 (five) fiscal years;
      - Monthly financial report, for the last 5 (five) fiscal years;
      - Semi-annual financial report for the last 5 (five) fiscal years
      - Annual sustainability report for the last 5 (five) fiscal years;
      - Annual pension fund report for the last 5 (five) fiscal years;
      - Annual report of the environmental partnership program for the last 5 (five) years;
      - Corporate presentation in the form of presentation files, audio and video for the last 5 (five) years; and
      - Summary of important financial data, in comparative form for the last 5 (five) fiscal years; including:
        - Revenue;
        - Gross profit;
        - Income (loss);
        - Total income (loss) attributable to owners of the parent entity and non-controlling interests;
        - Total comprehensive income (loss);
        - Profit (loss) per share;
        - Total assets;
        - Total liabilities;
        - Total equity;
        - Ratio of income (loss) to total assets;
        - Ratio of income (loss) to equity;
        - Ratio of income (loss) to revenue;
        - Current ratio;
        - Ratio of liabilities to equity; and
        - Ratio of liabilities to total assets; and
        - Other financial information and ratios relevant to the Bank and its industry type.
   d. GMS information, including: [ACGS C.9.4, C.9.5]
      - Announcement and Summons;
      - Agenda discussed in the GMS;
      - Summary of GMS Minutes.
   e. Stock information, including:
      - Number of outstanding shares;
      - Bonus shares;
      - Chronology of stock listing;
      - Stock price.

f. Bond and/or sukuk information, at least including:
   - Value of outstanding bonds/or sukuk;
   - Bond and/or sukuk rating results;
   - Maturity date; and
   - Bond interest rate and/or sukuk yield.

g. Dividend information.
h. Information for investors, public media, and/or analysts. [ACGS C.9.2]
i. Information regarding corporate actions undertaken by the Issuer or Public Company, as well as actions initiated by other parties involving the Issuer or Public Company., including:
   - Affiliated Transactions and Conflicts of Interest in Certain Transactions;
   - Distribution of Bonus Shares;
   - Share buybacks conducted by the Issuer or Public Company in response to market conditions with potential for a crisis, and
   - Share ownership programs by members of the Board of Directors, members of the Board of Commissioners, and employees of the Issuer or Public Company or other controlled parties; and

j. Material Information or Facts other than those disclosed in the Financial Services Authority Regulation.

4. Corporate Governance Information disclosed on the BNI website includes:
   a. Work guidelines for the Board of Directors, Board of Commissioners, Integrated Governance, and Internal Audit;
   b. Appointment, dismissal, and/or vacancy of the Corporate Secretary, including the temporary Corporate Secretary, and supporting information;
   c. Internal Audit Unit Charter;
   d. Code of Ethics;
   e. Committee work guidelines;
   f. Company Articles of Association;
   g. Whistleblowing System (WBS) reporting;
   h. Appointment and dismissal of Audit Committee members;
   i. Risk management policy;
   j. Policy on reporting system mechanism;
   k. Anti-corruption policy;
   l. Policy related to supplier selection and creditor rights;
   m. Policy on improving vendor capabilities;
   n. Integrated governance and governance report.

5. Corporate Social Responsibility information disclosed on the BNI website includes:

   a. Corporate social responsibility (CSR) information through BNI Berbagi has included policies, types of programs, and costs incurred by Issuers or Public Companies in the sustainability report.

   b. Information on the implementation of Environmental, Social, and Governance (ESG) disclosed on the BNI website includes: BNI's achievements in the ESG field, types of activities, and BNI's ESG profile video.
   c. Policies, types of programs, and costs as referred to in letter a related to the following aspects:
      i) Environment;
      ii) Employment practices, health, and safety;
      iii) Social and community development; and
      iv) Product and/or service responsibility, accompanied by supporting information.

E-Banking	Contact
Contains information about BNI ATM, BNI SMS Banking, BNI Internet Banking, BNI Mobile Banking, BNI Phone Banking, O-Branch, BNI Agen46, TapCash, Debit Online, LinkAja, BNI Ipay, and BNI Smartpay.	Contains information about Branch Office Locations, Global Network, and BNI Contacts.

Awards and Certifications

AWARDS

International Awards



Alpha Southeast Asia
17th Annual Award 2023
Best Banking API Solution

February 2024
Alpha Southeast Asia



Alpha Southeast Asia Best Financial Institution Awards 2024
Best Trade Finance Bank in Indonesia

May 2024
Alpha Southeast Asia



FX Awards Indonesia
Most Active FXall Bank (Taker)

June 2024
LSEG FX



FX Awards Indonesia
Most Active FXall Bank (Maker)

June 2024
LSEG FX



Asian Banking & Finance Corporate & Investment Banking Awards 2024
Green Deal of the Year – Indonesia

July 2024
Asian Banking & Finance



Asian Banking & Finance Corporate & Investment Banking Awards 2024
Project Infrastructure Deal of the Year – Indonesia

July 2024
Asian Banking & Finance



Asian Banking & Finance Retail Banking Awards 2024
Digital Business Banking Initiative of the Year - Indonesia

July 2024
Asian Banking & Finance



Asian Banking & Finance Wholesale Banking Awards 2024
Indonesian Domestic API Initiative of the Year

July 2024
Asian Banking & Finance



Alpha Southeast Asia Treasury & FX Awards 2024
Best FX Bank for Structured Hedging Solutions and Proprietary Trading Ideas

July 2024
Alpha Southeast Asia



Alpha Southeast Asia Treasury & FX Awards 2024
Best Corporate Treasury Sales and Structuring Team

July 2024
Alpha Southeast Asia



Alpha Southeast Asia Treasury & FX Awards 2024
Best FX Bank for CCS, IRS, Forward & Options Hedging

July 2024
Alpha Southeast Asia



Forbes 2024
World's Best Employers

October 2024
Forbes



Talent Awards
Best Employer Brand

November 2024
LinkedIn



Altogether 2024
Highest ATM Debit SOE Transaction

November 2024
Altogether



Sapphire Stone Membership
On Passing the Stone Membership Program

November 2024
Altogether



Corporate Treasurer Awards 2024
Best for Asset/Liquidity Solutions

December 2024
Corporate Trasurer



Corporate Trasurer Awards 2024
Financial Institutions Awards -
Best Bank for Payment Solutions

December 2024
Corporate Trasurer

Other International Awards

Awards	Month and Year	Organizer
Forbes World's Best Banks 2024, BNI Ranked 944th in the World	June 2024	Forbes
Appreciation for contribution in enhancing Indonesia Japan business relations especially through LCS Framework	June 2024	Bank Indonesia
Asian Banking & Finance Wholesale Banking Awards 2024 Indonesia Domestic Digital Transformation Bank of the Year	July 2024	Asian Banking & Finance
Asian Banking & Finance Wholesale Banking Awards 2024 Indonesia Domestic SME Partnership Initiative of the Year	July 2024	Asian Banking & Finance
Red Hat APAC Innovation Awards 2024 for Indonesia, Winner in Category Digital Transformation and Hybrid Cloud Infrastructure	August 2024	Red Hat APAC
Global Retail Banking Innovation Award 2024 Best Mobile Banking Initiative – Indonesia (wondr by BNI)	September 2024	The Digital Banker
BNI Breaks the List of 1000 World's Best Companies 2024 according to TIME and Statista	September 2024	Time Magazine and Statista
Best Indonesian Bank in Hong Kong for Serving Indonesia Diaspora	November 2024	The Consulate General of Republic of Indonesia in Hong Kong
BNI Achieves World's Most Trusted Company 2024	November 2024	Newsweek & Statista
BNI won two awards at the Corporate Treasurer Awards 2024.	December 2024	Corporate Treasure

National Awards



Indonesia Enterprise Risk Management Award - VI - 2024
The Best Indonesia Enterprises Risk Management Award VI - 2024

January 2024
Economic Review



Indonesia Enterprise Risk Management Award - VI - 2024
The Best of the Best (Grand Champion) Indonesia Enterprises Risk Management Award VI - 2024

January 2024
Economic Review



ESG Appreciation Night
ESG Lowest Risk

February 2024
Investor Daily Indonesia



ESG Appreciation Night
Most Appreciated ESG Report

February 2024
Investor Daily Indonesia



JCB Indonesia Award 2024
Best Issuing Total Sales Volume in Mass Affluent Products in Indonesia 2023

February 2024
JCB Indonesia



JCB Indonesia Award 2024
Best Issuing International Sales Volume in Precious Products in Indonesia 2023

February 2024
JCB Indonesia



JCB Indonesia Award 2024
Best New Product in Indonesia 2023 - BNI JCB Ultimate Card

February 2024
JCB Indonesia



Top Brand Award
Outstanding Achievement in Building the Top Brand

February 2024
Frontier - Marketing



Baznas Awards 2024
Best Zakat Payment Service Provider Bank 2024

February 2024
BAZNAS



Marketeers Omni Brands of the Year 2024
Innovative Digital Operation Digitizing Health Operational Assistance

March 2024
Marketeers



BUMN Corporate Communications and Sustainability Summit 2024
Sustainability Category - Creating Shared Value (CSV)

March 2024
Marketeers



13th Digital Brand Awards 2024
Platinum Trophy/The Best Conventional Bank in Digital Brand/10 Years in a Row

April 2024
Infobank



13th Digital Brand Awards 2024
Platinum Trophy/The Best Conventional Debit Card in Digital Brand/10 Years in a Row

April 2024
Infobank



13th Digital Brand Awards 2024
Platinum Trophy/The Best Conventional Credit Card in Digital Brand/10 Years in a Row

April 2024
Infobank



13th Digital Brand Awards 2024
Golden Trophy/The Best Bank Savings Account In Digital Brand/5 Years in a Row/2020-2024 – BNI TAPLUS

April 2024
Infobank



13th Digital Brand Awards 2024
Golden Trophy/The Best Bank Mortgage Loan In Digital Brand/5 Years In A Row/2020-2024 – BNI Griya

April 2024
Infobank



13th Digital Brand Awards 2024
The Highest Digital Index/ Conventional Bank

April 2024
Infobank



13th Digital Brand Awards 2024
The Highest Digital Index/ E-Money Conventional Bank

April 2024
Infobank



13th Digital Brand Awards 2024
The 2nd Highest Digital Index Debit Card Conventional Bank

April 2024
Infobank



13th Digital Brand Awards 2024
The 3rd Highest Digital Index/ Savings Account Conventional Bank

April 2024
Infobank



13th Digital Brand Awards 2024
The 3rd Highest Digital Index/ Credit Card Conventional Bank

April 2024
Infobank



13th Digital Brand Awards 2024
The 3rd Highest Digital Index/ Internet Banking Conventional Bank

April 2024
Infobank



13th Digital Brand Awards 2024
The Best/Conventional Bank/ KBMI 4

April 2024
Infobank



13th Digital Brand Awards 2024
The Best/E-Money Bank/KBMI 4

April 2024
Infobank



13th Digital Brand Awards 2024
The 2nd Best/Credit Card Conventional Bank/KBMI4

April 2024
Infobank



13th Digital Brand Awards 2024
The 2nd Best/Debit Card Conventional Bank/KBMI4

April 2024
Infobank



13th Digital Brand Awards 2024
The 2nd Best/Bank Savings Account/KBMI 4

April 2024
Infobank



13th Digital Brand Awards 2024
The 2nd Best/Internet Banking Conventional Bank/KBMI 4

April 2024
Infobank



NUSANTARA
Nusantara - Pioneer Investor

April 2024
Otorita IKN



Award from BNPB
Tree Planting Activities in Commemoration of Earth Day and Environmental Recovery after Floods and Landslides

April 2024
BNPB



13th Digital Brand Awards 2024
The 3rd Highest Digital Index Mortgage Loan Coventional Bank

May 2024
LSP AREA INDONESIA



Marketeers Youth Choice Award (YCA) 2024
Bronze award for Electronic Money category (TapCash)

May 2024
Marketeers



Marketeers Youth Choice Award (YCA) 2024
Dream Workplace BUMN

May 2024
Marketeers



Award for Business Entities Paying Contributions as Early as 2024

May 2024
BPJS Kesehatan



SBBI Awards 2024
BNI Achieved Prestigious Brand in Banking Services Category for MSMEs to Go Global

June 2024
Solopos Media Group



RAKERKESNAS 2024
Participation and Support for National Health Work Meeting 2024

June 2024
Kementerian Kesehatan



Award from the Ministry of Finance Directorate General of Treasury
Collecting Agent Performance of 2023

July 2024
Ministry of Finance



Award from Indonesia's Minister of Villages, Development of Underdeveloped Regions, and Transmigration
Commitment and Cooperation in Developing the Nusantara Pertinent Technology

July 2024
Minister of Villages, Development of Underdeveloped Regions, and Transmigration of RI



Sustainable Marketino Excellence (SME)
Xpora SME Enabler of the Year

July 2024
Marketeers



Indonesian Best Bank in Service Excellence 2024
The Best Overall Contact Center - Conventional Bank

July 2024
Marketing Research Indonesia (MRI) & Infobank



Indonesian Best Bank in Service Excellence 2024
The Best Phone Banking - Conventional Bank

July 2024
Marketing Research Indonesia (MRI) & Infobank



Indonesian Best Bank in Service Excellence 2024
The Best Call Center - Conventional Bank

July 2024
Marketing Research Indonesia (MRI) & Infobank



Indonesian Best Bank in Service Excellence 2024
The Best Overall E-Banking

July 2024
Majalah Infobank dan Marketing Research Indonesia (MRI)



Indonesian Best Bank in Service Excellence 2024
The Best Branch ATM

July 2024
Majalah Infobank dan Marketing Research Indonesia (MRI)



Indonesian Best Bank in Service Excellence 2024
The 2nd Best Social Media - Conventional Bank

July 2024
Marketing Research Indonesia (MRI) & Infobank



Indonesian Best Bank in Service Excellence 2024
The 2nd Best Mobile Banking

July 2024
Infobank Magazine and Marketing Research Indonesia (MRI)



Indonesian Best Bank in Service Excellence 2024
The 2nd Best Overall Digital Channel

July 2024
Infobank Magazine and Marketing Research Indonesia (MRI)



Indonesian Best Bank in Service Excellence 2024
The 2nd Best SMS Banking

July 2024
Infobank Magazine and Marketing Research Indonesia (MRI)



Indonesian Best Bank in Service Excellence 2024
The 3rd Best Conventional Bank in Service Excellence

July 2024
Infobank Magazine and Marketing Research Indonesia (MRI)



Appreciation Charter for Inclusive Job Center Implementation
Participation in Supporting Government Programs for Disabled Workers

July 2024
BPJS Employment



Award from Dharma Wanita Persatuan Ministry of State Secretariat RI
Government-Owned Bank that Concerns about Education in 2024

July 2024 & August 2024
Ministry of State Secretariat



Financial Literacy Awards 2024
Best Financial Literacy Program

August 2024
OJK



Katadata ESG Awards 2024
Finance Sector – Social Champion

August 2024
Katadata ESG



The Best Contact Center Indonesia 2024
Gold Winner of The Best Customer Experience

September 2024
Indonesia Contact Center Association (ICCA)



The Best Contact Center Indonesia 2024
Silver Winner of Best Human Resource Development

September 2024
Indonesia Contact Center Association (ICCA)



The Best Contact Center Indonesia 2024
Gold Winner of The Best Agent Digital Social Media

September 2024
Indonesia Contact Center Association (ICCA)



The Best Contact Center Indonesia 2024
Bronze Winner
The Best Agent Digital Chat

September 2024
Indonesia Contact Center Association (ICCA)



The Best Contact Center Indonesia 2024
Bronze Winner
The Best Agent English

September 2024
Indonesia Contact Center Association (ICCA)



Award from the Minister of Villages, Development of Disadvantaged Regions, and Transmigration of the Republic of Indonesia
Mitra Peduli Desa Wisata 2024
September 2024
Ministry of Villages, Development of Underdeveloped Regions, and Transmigration



Indonesia Human Capital Award 2024
The Best Human Capital Director - 2024

September 2024
Economic Review



Indonesia Human Capital Award 2024
Best Company In Strategic Sutainability 2024

September 2024
Economic Review



Indonesia Human Capital Award 2024
Best Company In Human Capital 2024

September 2024
Economic Review



Anugerah ESG Republika 2024
Governance – Sustainability Reporting

September 2024
Republika



Rapat Anev Pengelolaan Materiel Regident & PNBP T.A. 2024

September 2024
Korlantas POLRI



BAZNAS Award
SOE with Best Collection

September 2024
BAZNAS



BAZNAS Award
SOE with Best Reporting

September 2024
BAZNAS



BAZNAS Award
SOE with Best Distribution

September 2024
BAZNAS



In-House Counsel Awards 2024
Indonesia In-House Counsel Elite 2024 (in the Industrial Banking)

October 2024
Hukum Online



In-House Counsel Awards 2024
Indonesia's Most Respected In-House Counsel 2024 (in the Industrial Banking)

October 2024
Hukum Online



Malam Anugerah GCG Awards 2024
Best Practices for Anti-Graft Initiatives and Fostering Transparency

October 2024
CNBC Indonesia



CSR Awards 2024
Most Impactful Program on Environment

October 2024
Investortrust.id & Bumi Global Karbon Foundation



CSR Awards 2024
Integrity & Tranparancy in Impact Award

October 2024
Investortrust.id & Bumi Global Karbon Foundation



CSR Awards 2024
SROI Excellent Award

October 2024
Investortrust.id & Bumi Global Karbon Foundation



ATM Bersama Awards 2024
The Most Transaction Growth Issuer

October 2024
Artajasa



Debtor Performance Assessment of Banking Loan Category in 2023

October 2024
Ministry of Finance



Prima Awards 2024
Best Acquirer Bank-All Features

October 2024
Prima



Prima Awards 2024
Best Acquirer Bank (ATM)

October 2024
Prima



Prima Awards 2024
Best Issuer Bank (ATM)

October 2024
Prima



Annual Report Award 2023
Winner of the Financial SOE Category at the Annual Report Award 2023

October 2024
KNKG



Good Corporate Governance Award 2024
CGPI 2023 Indonesia Most Trusted Companies Award as a Highly Trusted Company

November 2024
Swa Magazine and IICG



The Magical Rise Out-Of-Home
The Most Impactful Campaign

November 2024
Cityvision



YPP Awards 2024
Top Corporate Donors – Healthcare Category

November 2024
YPP SCTV Indosiar



Indonesia Client Appreciation Night 2024
Coalition Pioneer and Marketing Excellence Award Co-Brand

November 2024
PT. Visa Worldwide Indonesia



Indonesia Client Appreciation Night 2024
Outstanding Penetration of Corporate Card - KBMI 4

November 2024
PT. Visa Worldwide Indonesia



Indonesia Client Appreciation Night 2024
Outstanding Active Growth Signature Credit Cards - KBMI 4

November 2024
PT. Visa Worldwide Indonesia



Asia Sustainability Report Rating (ASRRAT) 2024
Gold Rank in Asia Sustainability Report Rating (ASRRAT) 2024

November 2024
(National Center for Corporate Reporting/NCCR)



ESG Appreciation Night
Appreciated Diversity University ESG Report

November 2024
Investor Daily Indonesia



ESG Appreciation Night
Most Appreciated ESG Report

November 2024
Investor Daily Indonesia



ESG Appreciation Night
Appreciated Circular Economy ESG Report

November 2024
Investor Daily Indonesia



Apresiasi Donatur Beasiswa 2024
IPB University's Scholarship Contributors 2024

November 2024
Institut Pertanian Bogor



Anugerah Reksa Bandha 2024
Execution Auction Seller Group 1, 3rd Place

December 2024
Ministry of Finance of the Republic of Indonesia Directorate General of State Assets



Anugerah Diktisaintek 2024
BNI Award as the Most Innovative Bank for Digital Campus Transformation

December 2024
Ministry of Education, Science and Technology (Kemdiktisaintek) Republic of Indonesia



The 15th IICD Corporate 2024
The Best Overall in Corporate Governance

December 2024
IICD



Key Strategic Partner in the Management of Government Accounts for Pre-Employment Card Funds

December 2024
Coordinating Ministry for Economic Affairs



Award from BAPPENAS
Partner in Government Account Management at the Ministry of BPN/Bappenas

December 2024
BAPPENAS



Award from BPDPKS
Partner Bank with Best Host to Host Transaction Automation in 2024 Category Himbara and BSI

December 2024
BPDPKS



BP TAPERA Award
Expansion of Host to Host Services for FLPP OIP Funds Collection Accounts

December 2024
Public Housing Saving Managent Agency



Best Employer Awards 2024
Top 5 Student Care Award

December 2024
Telkom University



MURI Record
First National Bank to Empower People with Disabilities

December 2024
MURI



Award for Scholarship Activity

December 2024
Institut Teknologi Bandung



Best SUN Primary Dealer in 2024 for Quotation Implementation

December 2024
Ministry of Finance

Other National Awards

Awards	Month and Year	Organizer
FI & Treasury Gathering Bank Sulselbar: Strategic Alliance of FI & Treasury in Indonesian Market	February 2024	PT BPD Sulawesi Selatan & Sulawesi Barat (Bank Sulselbar)
BUMN Corporate Communications and Sustainability Summit (BCOMSS) 2024 Gold Medal in the Creating Shared Value (CSV) Category	March 2024	Ministry of State-Owned Enterprises of the Republic of Indonesia
Top Brand Award 2024 The Best Mind Share, Market Share, and Commitment Share (Category: KPR)	March 2024	Marketing Magazine
BUMN Corporate Communications and Sustainability Summit (BCOMSS) 2024 Social Media and Corporate Campaign category and Gold Medal for Creating Shared Value (CSV) category - "BNI agen46 Financial Hero"	March 2024	Ministry of SOEs
Top Brand Award 2024 The Best Mind Share, Market Share, and Commitment Share (Category: Children's Savings Account)	March 2024	Marketing Magazine
Top Brand Award 2024 The Best Mind Share, Market Share, and Commitment Share (Category: Deposit Account)	March 2024	Marketing Magazine
B**UMN Corporate Communications and Sustainability Summit (BCOMSS) 2024** Social Media and Corporate Campaign Category (1st winner), Creating Shared Value Category (Gold Medal)	March 2024	Ministry of SOEs
Indonesia Digital Popular Brand Award 2024 Prepaid (Electronic Money) category with its flagship product, Tapcash.	March 2024	Infobrand
13th Digital Brand Awards 2024 The 3rd Highest Digital Index/Mortgage Loan Conventional Bank	April 2024	Infobank
Best Performance of Bank ATMs	May 2024	Infobank
CNBC Indonesia Top Women Fest BNI Finance Director Novita Widya Anggraini received an award as "The Most Inspiring Woman Leader: In Finance Industry".	May 2024	CNBC Indonesia
BNI is listed in Fortune Indonesia's 100 Largest Companies in Indonesia	August 2024	Fortune Magazine
Financial Literacy Award 2024 BNI received the Best Literacy Program award.	August 2024	OJK
Reformasi Perpajakan 2024	August 2024	Ministry of Finance
Top Social Media Award 2024 Rank 2 Credit Card Category - BNI Credit Cards	September 2024	Marketing Magazine
Top GRC Awards 2024 #Stars 5	September 2024	Top Business
Anugrah ESG Republika 2024 Governance Sustainability Reporting Category	September 2024	Republika
Mitra BUMN Champion 2024 BNI received an award as Top 3 National Champion in the BUMN Creditor/Investor Category	October 2024	Ministry of SOEs
Top 100 CEO 2024 BNI Achieves Top 100 CEO & Top 200 Future Leader 2024 (CEO of The Year, Bankers of The Years, 200 Future Leader)	November 2024	Infobank
BI Award 2024 BNI Award as Best Inclusive Financing Supporting Bank	November 2024	Bank Indonesia
BI Award 2024 Bank Award with Best Reporting Compliance KBMI 3 & 4	November 2024	Bank Indonesia
BI Award 2024 Bank Award with Best Foreign Exchange Reporting Compliance	November 2024	Bank Indonesia
BI Award 2024 BNI Award as the Best SKNBI and KPDHN Participant	November 2024	Bank Indonesia
BI Award 2024 Best Supporting Rupiah Money Market Development Award (Repo Award)	November 2024	Bank Indonesia
Asia Sustainability Report Rating (ASRRAT) 2024 Gold Rank	November 2024	National Center for Corporate Reporting (NCCR)
CNBC Indonesia Awards 2024 Outstanding Banking Transformation of The Year	December 2024	CNBC Indonesia
APPRECIATION Contributor to the 2024 Joint Movement for Consumer Protection (GEBER PK)	December 2024	Bank Indonesia
Best BI-Fast Participants - KBMI Banks 3 and 4	December 2024	Bank Indonesia

Certifications



Certificate of Appreciation

2024
The Investor and Financial Education Council (IFEC) Hong Kong part of Securities and Future Commission (SFC) Hong Kong



ISO 30301:2019
Quality Management System for Provision of Filing and Archiving Services for Archive Management Unit

December 2024 - December 2027
PT Tuv Sud Indonesia



ISO 9001:2015
Quality Management for Vendor Management (VM) Unit

November 2024
PT Tuv Sud Indonesia



ISO 9001:2015
Quality Management for Own Estimate Price (HPS) Unit

November 2024
PT Tuv Sud Indonesia



Platinum Greenship New Building V.1.2 Plaza BNI

until 26/10/2025
Green Building Council Indonesia



Gold Greenship New Building V.1.2 Menara BNI

December 2020-December 2023
(in the process of renewal)
Green Building Council Indonesia



ISO 9001:2015
Quality Management System

March 2023-March 2025
PT SGS Indonesia

Certification	Validity	Organizer
ISO 27001 : 2013	BSI	2023 – 2025
ISO 9001:2015	Llyod's Register	June 26, 2027
ISO 9001:2015 Quality Management System Publication Financial Reporting Process and Income Tax Reporting Process	PT SGS Indonesia	26 March 2023 - 9 March 2026 (Certificate ID17/03935)


BNI

04

Management Discussion and Analysis on Company Performance



Economy and Industry Overview	220
BNI Strategic Policy for 2024	226
Operational Overview per Business Segment	228
Digital Banking	282
Comprehensive Financial Overview	300
Commitments and Contingencies	331
Spot Transactions, Derivatives, and Hedging Facilities	333
Pledged Bank Assets	335
Prime Lending Rate (SBDK)	336
Ability to Pay Debt	339
Company Receivables Collectibility Level/ Loan Collectibility Level	340
Credit Risk Management	343
Capital Structure and Management Policy for Capital Structure and Capital Risk Management Practices	352
Material Commitments for Capital Goods Investments	354
Capital Goods Investments Realized In The Last Fiscal Year	356
Property for Investment	357
Information and Material Facts That Occurred After The Date of the Accountant's Report	357
Business Target Achievements in 2024	358
Business Continuity Information	361
Details of Matters Arising in 2024	364
Business Prospects for 2025	365
Performance Projections for 2025	367
Marketing Aspect	369
Dividend and Distribution Policy	373
BNI's Contribution to National Development	376
Information regarding the Realization of Use of Public Offering Proceeds	377
Negotiable Certificate of Deposit (NCD) Rupiah & Foreign Currencies	384
Material Information Regarding Corporate Action, Investments, Expansions, Divestments, Business Mergers, Acquisitions, and/or Restructuring	385
Information on Material Transactions that Contain Conflicts of Interest and/or Transactions with Affiliated/Related Parties	387
Prohibitions, Restrictions and/or Significant Barriers to Transferring Funds Between Banks and Other Entities in One Business Group	397
Changes to Legal Regulations that significantly impacted BNI	398
Changes in Accounting Policies and Their Impact on BNI	410
Bank Health Level	411
PMN Additional Use Report	412
Implementation of National Strategic Projects or Other Assignments	413


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Economic and Industry Overview

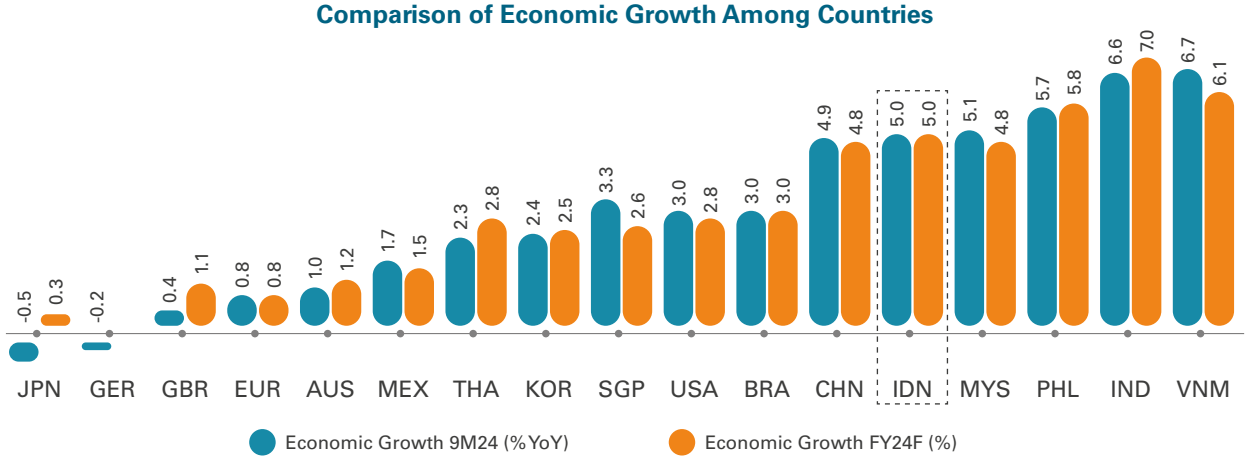
As of the third quarter of 2024, the Central Statistics Agency (BPS) has recorded that Indonesia's economic growth remains strong and shows resilience, with a performance of 5% in September 2024.



THE GLOBAL ECONOMIC CONDITIONS

The global economic condition is expected to remain solid in 2024, as it is projected by the IMF that the growth to reach 3.2%, slightly lower than 3.3% in 2023.

Comparison of Economic Growth Among Countries



Source: IMF, BNI Office of Chief Economist

However, not all the world countries are experiencing higher growth. Germany, which is projected to grow by 0% in 2024, actually contracted by -0.2% until September 2024. The UK and Japan grew only by 0.4% and -0.5%, respectively, until September 2024, both below their projections of 1.1% and 0.3%.

Taken as a whole, the momentum of economic growth has started to show signs of weakening entering July 2024, as reflected in the average performance of the manufacturing sector, which remains in the contraction zone (<50) for several major economies. This slowing momentum reached its lowest point in September and seems to be improving as we enter Q4-2024. Particularly, this improvement is seen in China (51), India (56.4), the US (49.4), and Vietnam (49.8), which all experienced an increase in their manufacturing PMI indices in December 2024 compared to September 2024 (end of Q3-2024).

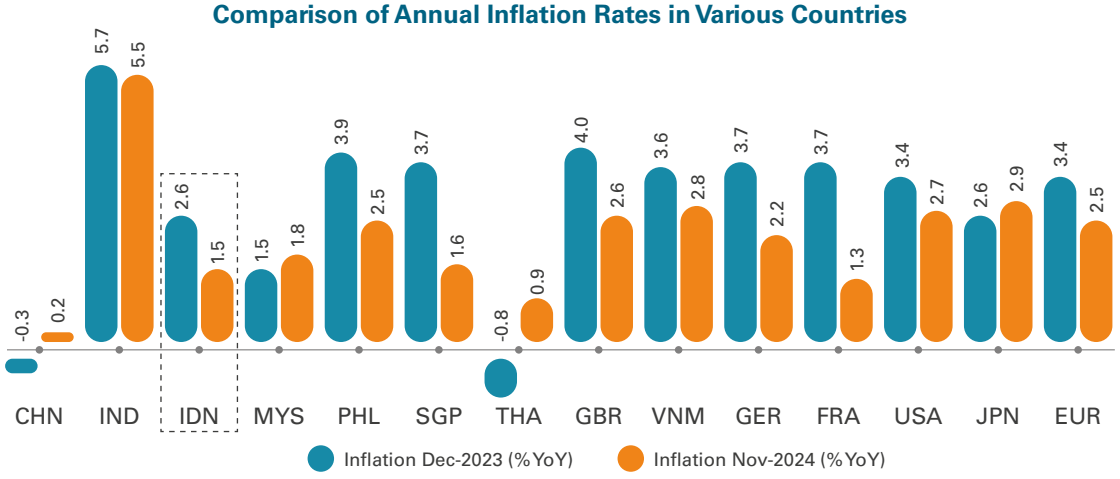
Manufacturing Sector Experiences Weakness, but Improves in the Fourth Quarter - 2024

	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
GBR	47.0	47.5	50.3	49.1	51.2	50.9	52.1	52.5	51.5	49.9	48.0	47.0
USA	50.7	52.2	51.9	50.0	51.3	51.6	49.6	47.9	47.3	48.5	49.7	49.4
EUR	46.6	46.5	46.1	45.7	47.3	45.8	45.8	45.8	45.0	46.0	45.2	45.1
GER	45.5	42.5	41.9	42.5	45.4	43.5	43.2	42.4	40.6	43.0	43.0	42.5
FRA	43.1	47.1	46.2	45.3	46.4	45.4	44.0	43.9	44.6	44.5	43.1	41.9
CHN	50.9	45.2	53.9	52.2	52.5	51.6	49.4	50.2	49.8	50.4	53.3	51.0
IND	56.5	56.9	59.1	58.8	57.5	58.3	58.1	57.5	56.5	57.5	56.5	56.4
IDN	52.9	52.7	54.2	52.9	52.1	50.7	49.3	48.9	49.2	49.2	49.6	51.2
KOR	51.2	50.7	49.8	49.4	51.6	52.0	51.4	51.9	48.3	48.3	50.6	49.0
PHL	50.9	51.0	50.9	52.2	51.9	51.3	51.2	51.2	53.7	52.9	53.8	54.3
SGP	50.7	50.6	50.7	50.5	50.6	50.4	50.7	50.9	50.9	50.8	51.0	51.1
AUS	50.1	47.8	47.3	49.6	49.7	47.2	47.5	48.5	46.7	47.3	49.4	47.8
MYS	49.0	49.5	48.4	49.0	50.2	49.9	49.7	49.7	49.5	49.5	49.2	48.6
VNM	50.3	50.4	49.9	50.3	50.3	54.7	54.7	52.4	47.3	51.2	50.8	49.8
MEX	50.2	52.3	52.2	51.0	51.2	51.1	49.6	48.5	48.5	48.4	49.9	49.8
BRA	52.8	54.1	53.6	55.9	52.1	52.5	54.0	50.4	53.2	52.9	52.3	50.4
JPN	48.0	47.2	48.2	49.6	50.4	50.0	49.1	49.8	49.7	49.2	49.0	49.6
ITA	48.5	48.7	50.4	47.3	45.6	45.7	47.4	49.4	48.3	46.9	44.5	46.2

Source: CEIC, BNI Office of Chief Economist

From the price level perspective, inflation rate has also slowed down in major economies. In the United States, consumer inflation as of November 2024 reached 2.6%, down from 3.4% in December 2023, in line with the slowdown in inflation in the European Union, which reached 2.5% YoY in November (compared to 3.4% YoY in December 2024) and the UK at 2.6% YoY (compared to 4% YoY in December 2024). In Southeast Asia, the same trend has been noticeable in Vietnam, Singapore, the Philippines, and Indonesia, all of which have experienced a slowdown in inflation since the end of 2023.

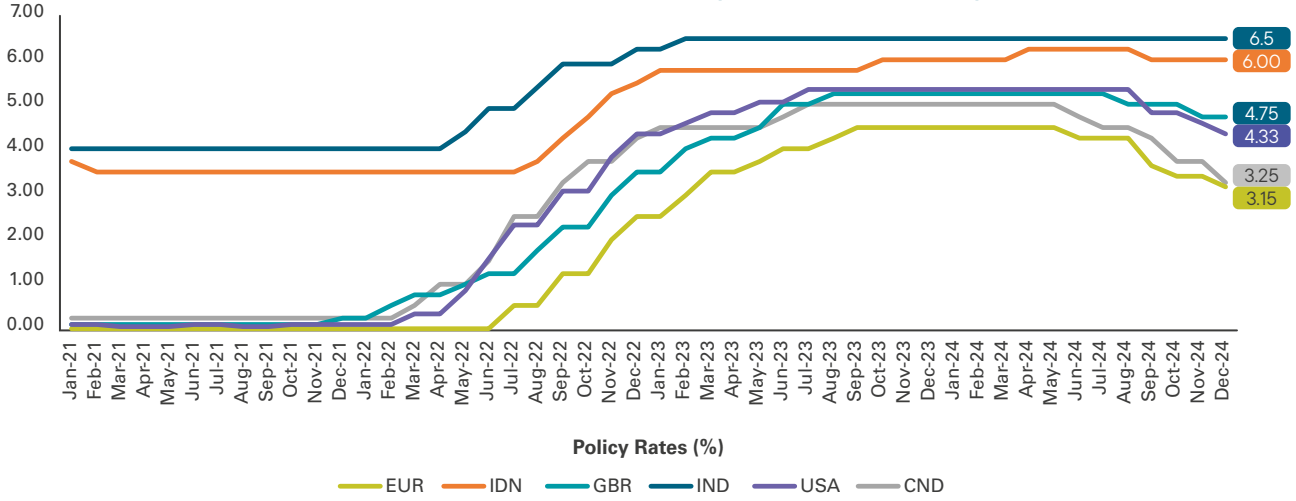
Comparison of Annual Inflation Rates in Various Countries



Source: CEIC, BNI Office of Chief Economist

Driven by unflatering slowdown of inflation, central banks around the world have been able to reduce their benchmark interest rates. In the United States, the Fed has cut the Fed Fund Rate (FFR) three times by a total of 100bps in September (50bps), November (25bps), and December 2024 (25bps), bringing the FFR to 4.25-4.50%. In other regions, such as Europe, the benchmark interest rate has been cut four times, down to 3% for the deposit facility rate. The same trend has occurred in China, where moderating economic growth and lower growth prospects have led the People's Bank of China to cut the Loan Prime Rate (LPR) two to three times throughout 2024.

Several Central Banks from Other Countries have Lowered Interest Rates to Address Economic Mederation (as of December 2024)

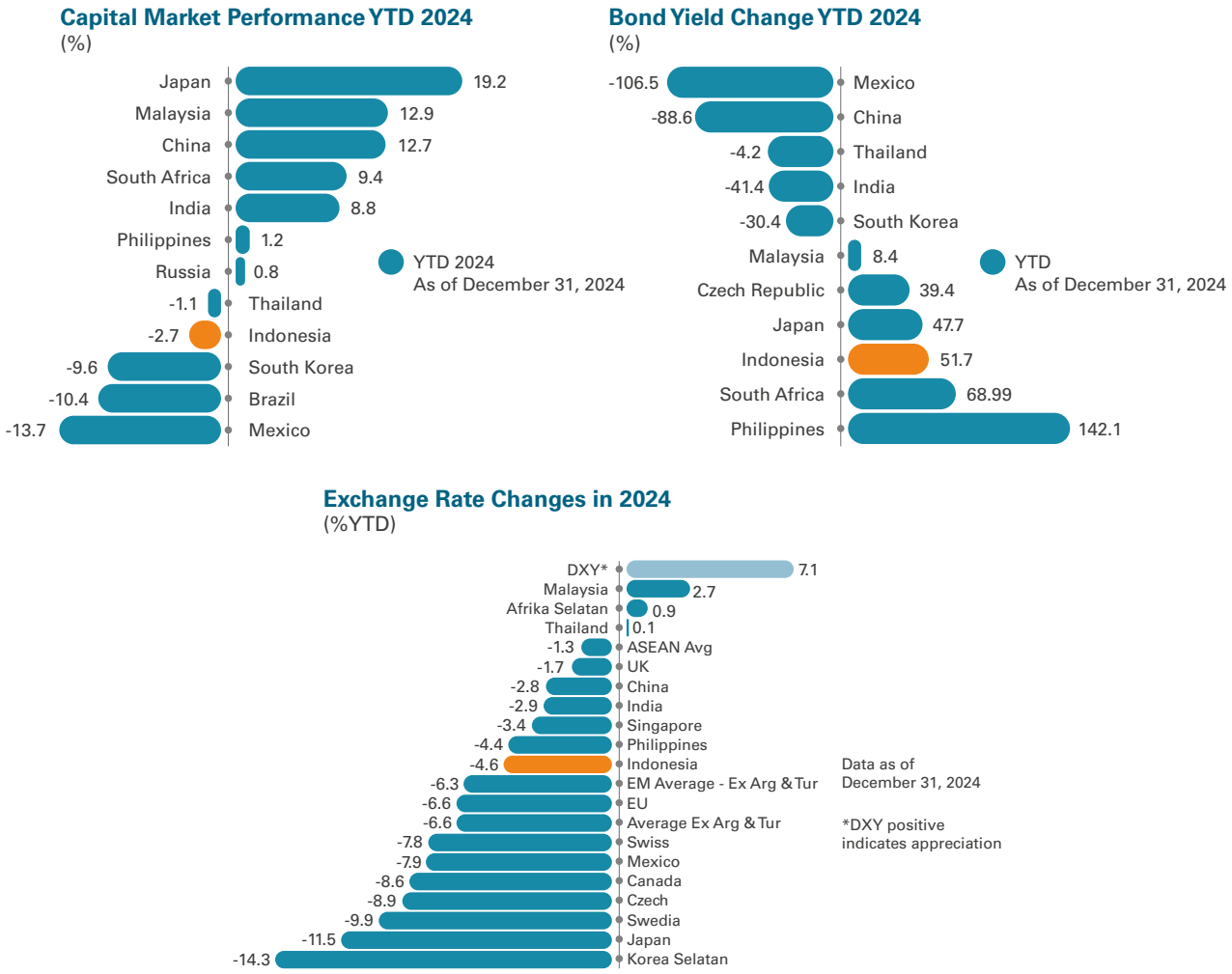


Source: CEIC, BNI Office of Chief Economist

In the mean time, from the financial markets, various events caused the Indonesian financial market to move dynamically in 2024. By the end of the year (Q4), the pressure from capital outflows in Indonesia's financial market was quite high, recording a negative figure (IDR-54 trillion in Q4-2024), driven by various global sentiments, including tensions in the Middle East and the US presidential election, which resulted in Donald Trump being elected as the 47th president of the United States.

As a result of the financial market dynamics throughout the past year, the performance of the Rupiah exchange rate and the capital market showed a decline. The Rupiah exchange rate by the end of 2024 depreciated by -4.6% YTD to IDR16,102 per USD, as well as a -2.7% YTD correction in the IDX Composite (IHSG). Furthermore, bond yields rose by 52bps YTD to 7.0%. However, the Rupiah's depreciation trend was better compared to other emerging market currencies (-6.3% YTD).

Capital Market Performance and Exchange Rate Weakened as a Result of Market Dynamics Throughout 2024



Source: Bloomberg, BNI Office of Chief Economist

THE NATIONAL ECONOMIC CONDITIONS

Until Q3-2024, the Central Statistics Agency (BPS) reported that the growth of Indonesia's economic remained strong and showed resilience, with a growth rate of 5% in September 2024. This growth rate was supported by government spending (7.5% YoY in September 2024) and construction investment (5.6% YoY in September 2024). Government spending was propelled by fiscal support for the presidential election and simultaneous regional elections, followed by the realization of spending on goods and social programs. Furthermore, investment growth was supported by investments in machinery & equipment, as well as buildings & structures, in line with the development projects for the new capital city, Nusantara (IKN), and the completion of national strategic programs (PSN). Meanwhile, household consumption grew moderately at 4.9% YoY in September 2024.

By sector, the high economic growth in 09M24 was perceived in the transportation and warehousing sector (9.0% YoY), accommodation (9.3% YoY), business services (8.5% YoY), and healthcare services (9.2% YoY); while sectors with weak growth performance in 09M24 included manufacturing (4.3%), agriculture and plantation sectors (0.7% YoY), and real estate services (2.3% YoY). The weak growth in primary service sectors and strong growth in tertiary service sectors can be attributed to two factors. First, the stagnation of purchasing power among the lower-middle-income group. Second, the growth in tertiary service sectors is largely supported by the upper-income group.

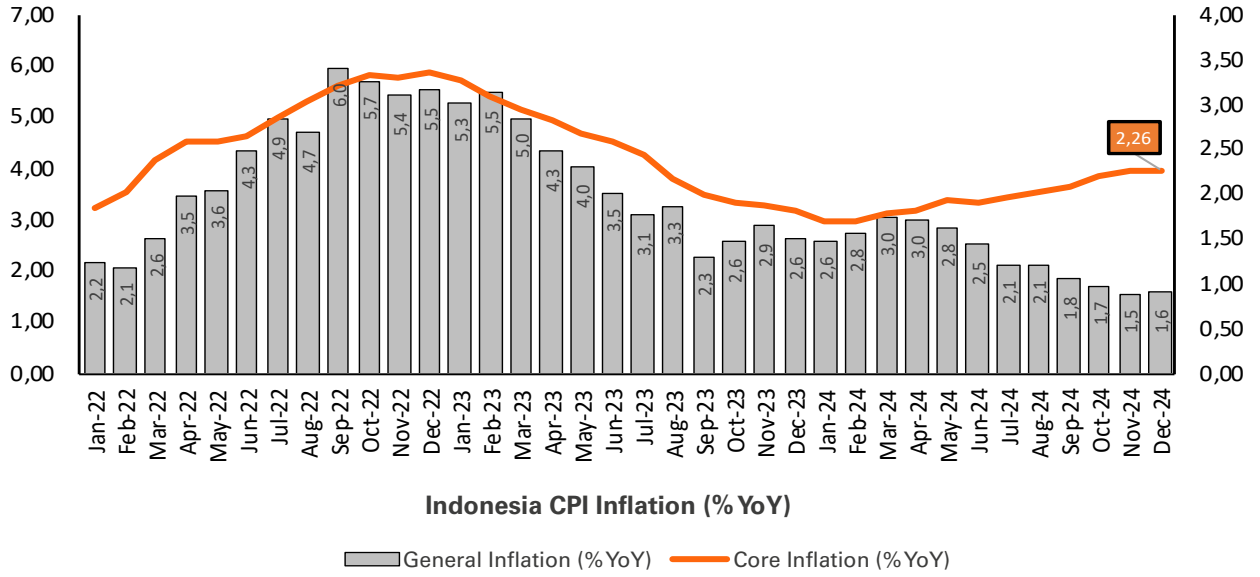
Indonesia's Economic Growth Based on Expenditure Components (% YoY)

	1Q22	2Q22	3Q22	4Q22	1Q23	2Q23	3Q23	4Q23	1Q24	2Q24	3Q24
Aggregate GDP	5.02	5.46	5.73	5.01	5.04	5.17	4.94	5.04	5.11	5.05	4.95
Household Consumption	4.35	5.52	5.40	4.50	4.53	5.22	5.05	4.47	4.91	4.93	4.91
LNPRT Consumption	5.91	5.03	5.99	5.72	6.16	8.59	6.18	18.11	24.29	9.98	11.69
Government Expenditure	-6.60	-4.61	-2.50	-4.72	3.31	10.47	-3.93	2.81	19.91	1.42	4.62
Investment (PMTDB)	4.08	3.09	4.98	3.33	2.11	4.63	5.77	5.02	3.79	4.43	5.15
Net Exports	3.60	37.00	-7.95	84.55	67.02	-1.23	11.90	10.10	1.36	10.15	-1.97
Export	14.40	16.32	19.09	14.95	11.74	-2.91	-3.91	1.64	1.44	8.18	9.09
Import	16.06	13.06	25.73	6.49	4.15	-3.23	-6.75	-0.15	1.46	7.79	11.47

Source: BPS, CEIC, BNI Office of Chief Economist

From the consumer price perspective, by the end of 2024, Indonesia recorded an inflation rate of 1.6% YoY based on the Consumer Price Index (CPI), marking a historically the lowest inflation rate. Throughout 2024, there were five months (May to September) during which Indonesia experienced deflation on a monthly basis. The decline in inflation over the past year was primarily contributed by a drop in food prices due to increased food supply following the impact of El Nino and government market interventions. However, this decline in food prices may also indicate weak domestic demand from the lower-middle-income groups, whose food consumption accounts for nearly 40-50% of their total spending. Meanwhile, core inflation rose to 2.3% YoY, driven by a surge in gold jewelry prices, meaning that core inflation without gold remained low at 1.7% YoY. This low core inflation is also believed to be related to structural issues, such as a weak formal labor market and high informality in employment.

Inflation declines annually to 1.6% YoY by end of 2024



Source: BPS, BNI Office of Chief Economist

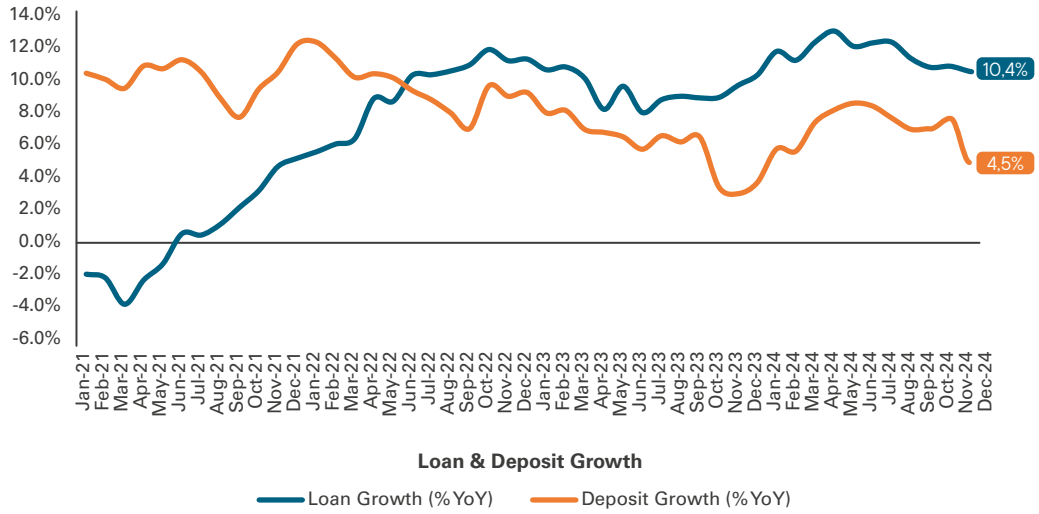
The low inflation throughout the second half of 2024, coupled with the reduction in the Fed Fund Rate (FFR) that initially occurred in September 2024, as well as the strengthening of the Rupiah during that period (by 1.9% YTD in September 2024), constitued factors that were considered by Bank Indonesia in lowering the BI rate by 25bps in September to 6.0%. However, due to the market volatility that occurred in most of Q4-2024 and the election of Donald Trump as US president, which increased inflation risks in the US, the downward trend in Bank Indonesia's policy interest rate did not continue.

THE BANKING INDUSTRY CONDITION

From the credit growth perspective, the trend shows solid growth, with Bank Indonesia reporting banking credit growth of 10.4%YoY as of December 2024. Based on the type of usage, working capital credit, investment credit, and consumer credit grew at 8.4% YoY, 13.6% YoY and 10.6% YoY, respectively. This banking credit growth is supported by third-party funds (DPK), which grew by 4.5% YoY as of December 2024. Throughout 2024, in addition to cutting interest rates once, Bank Indonesia also implemented macroprudential liquidity incentive policies (KLM) to support credit distribution to priority sectors, such as the downstream mining and food sectors, the automotive sector, trade, electricity, gas, and water sectors, tourism and creative economy sectors, as well as MSMEs.

The resilience of the financial system remained well-maintained during 2024. The loan-to-deposit ratio (LDR) stood at 89% as of December 2024. The banking capital adequacy ratio (CAR) in December 2024 was strong at 27%, enabling it to absorb risks and support credit growth. Meanwhile, the non-performing loan (NPL) ratio in the banking sector in December 2024 continued to decline, reaching 2.1% (compared to 2.4% in January 2024).

Loan Growth as of December 2024 Reached 10.4% YoY



Source: BI, OJK, BNI Office of Chief Economist

> "Throughout 2024, in addition to cutting interest rates once, Bank Indonesia also implemented macroprudential liquidity incentive (KLM) policies to support the distribution of credit to priority sectors, such as the downstream mining and food sectors, the automotive sector, trade, electricity, gas, and water sectors, tourism and the creative economy, as well as MSMEs."

BNI Strategic Policy in 2024

Amidst the volatility of the financial market and the challenging liquidity conditions that ensued, BNI has consistently recorded positive and sustainable financial performance growth throughout 2024. Margin stabilization has begun to be seen following BNI's strategy to strengthen its liquidity management amidst financial market turmoil. BNI also kept its credit growth accelerated in 2024, driven by financing to top-tier debtors in the Private Corporation and BUMN segments, financing to the Consumer segment mainly supported by Home Ownership Loans and unsecured loans (personal loans), as well as financing to the MSME and Consumer segments through subsidiaries hibank and BNI Finance.

Throughout 2024, BNI implemented various strategic policies, which involved selectively adjusting loan interest rates, diversifying funding sources, optimizing the LDR (loan-to-deposit ratio) at a level that remains safe, especially with the positive catalyst from BI's GWM incentives, and shifting the loan mix focused on the Rupiah denomination. BNI realizes that the biggest pressure on Cost of Fund comes from foreign currency funding, therefore since the beginning of 2024 BNI has taken strategic steps to reduce foreign currency credit expansion and focus on rupiah-denominated loans.

In terms of funding, one of BNI's strategies has been to optimize the CASA franchise, especially in the long term, by utilizing BNI's new mobile banking channel, wondr by BNI, which was launched on July 5, 2024. The wondr by BNI application can meet various financial needs of retail customers since the app comes with many transaction features such as QRIS payments, e-wallet top-ups, virtual accounts, domestic and international transfers, card management, financial and investment monitoring features, and many other features.

Through wondr by BNI, we are expanding our services through the utilization of the BNI ecosystem to meet customers evolving needs in this era of modern digital banking. Its key objective is to help its customers thrive, from making simple transactions to achieving financial goals.

BNI has also formulated strategic policy aspirations for 2024 that the Bank will continue to implement until 2029. BNI's strategic priorities for the next 5 years are summarized in "3P": Productivity, Platform, and Proposition to help achieve the company's financial targets. Further, in the series of its long-term plans (corporate plan), BNI has made 2024 a year of focus on Productivity by increasing it through skills development, role redesign, office network optimization, and analytics. The main results are transformation in HR skills training and leadership, optimal credit processes, and completion of network change formats.

Based on its Long-Term Plan stated in the BNI Corporate Plan 2024-2028 document, BNI is implementing the 2024 strategic policy in order to achieve its predetermined targets, as stated as follows:

1. **Increasing Business Expansion through Top Tier by Strengthening Risk Management**
   BNI will focus on business expansion in the Corporate Top Tier segment and priority sectors by prioritizing a strong risk management culture. Relationship Manager (RM) Productivity will be increased through more efficient reallocation. In addition, BNI will also acquire quality consumers through payroll loans and mortgage products, with a focus on areas with high business potential. Improving the quality of pipeline management and risk management will be a priority, especially for the SME and Commercial segments.

2. **Improving Digital Platforms to Optimize Transactional Banking and Cross-Selling**
   Optimizing digital platforms to improve transaction and cross-selling services. The Mobile Banking platform for consumers and BNI Direct for corporations will be strengthened to

make them more integrated and efficient. The use of data analytics will be maximized to support cross-selling in the consumer and non-lending segments. BNI will also develop technology-based solutions for government agencies and universities to generate low-cost funds. The focus is on expanding quality customer segments to increase transactions and low-cost funds.

3. **Strengthening Business Networks through Outlet Optimization**
   To strengthen its business network, BNI will optimize outlets in saturated markets and priority markets. The sales model and business processes will be strengthened to support network renewal, while synergy between branches and head offices will increase business penetration in various segments. BNI will also move to digitalization to increase customer transactions and evaluate the implementation of the Regional NWOW organization to ensure the effectiveness of the existing network.

4. **Developing International Business Networks to Support Global Market Penetration**
   Strengthening international business capabilities by improving human resources, technology, and business processes to face global market challenges. International business will continue to be developed through cross-border solutions and services, including trade, diaspora, investment, and international transactions. Expansion will be carried out by opening outlets in countries with high market potential to support BNI's global growth.

5. **Strengthening Human Capital and IT to Increase Productivity**
   Improving human resources (HR) with a focus on developing critical skills through special training for Relationship Managers in the SME, Enterprise, Commercial, and Wealth segments. In addition, IT capabilities and IT security will be strengthened to support more efficient and secure transactions and operations. Data management and analytics will be optimized to maximize business potential and cross-selling, as well as support data-based decisions.

6. **Optimizing BNI Group to Strengthen the Position of Subsidiaries**
   To strengthen the position of subsidiaries, BNI will increase the business capacity of subsidiaries to provide greater contributions to BNI. The main focus is to increase profitability and achieve a higher Return on Equity (ROE) target, and hence, support BNI's overall growth and financial stability.

Operational Overview Per Business Segment

Further explanation about the segments presented below is available for read in the Notes to the Consolidated Financial Statements as an integral part of this Annual Report. In 2024, BNI grouped its segments based on the following 2 (two) aspects:

1. Operating segment, which describes BNI's business segments based on the main customer groups and products as follows: Wholesale & International Banking, Institutional Banking, Enterprise & Commercial Banking, Retail Banking, Treasury, Head Office and Subsidiaries; and
2. Geographic segment, which describes the geographical distribution of BNI's business grouped under Indonesia, the United States, Europe, and Asia.



It takes well-thought strategy to deliver maximum results in meeting end-to-end customer needs with due consideration of market conditions and the portfolio balances in each segment. The objective of determining Operation Segment is to develop end-to-end solutions for customers across channels, both physical and digital, or across products. Customers can make the best use of all BNI products depending on their diverse needs through a one-stop service where a relationship manager is specifically assigned for each product.

BNI uses customer analysis and portfolio management to translate customer needs in the Business Banking sector into value-based industry analysis, Business Banking sector portfolio management, review and refinement of Business Banking credit systems and procedures and develop customized loans for customers with minimal risk. The various results of these analyses should improve the quality of BNI services with a sharper focus on the principle of "customer centric" to cater to customer needs.

This specific approach proves that BNI is becoming more capable of improving across geographies, from its head office, branches, regions, to overseas branches as it continues to provide information for data-supported decision making and improvements in order to deliver even more. The adoption of the Operating Segment system also impacts how the performance of BNI's Operating Segment is measured against customer ownership.

OPERATING SEGMENT

Information on each segment reporting in BNI's Operating Segment reporting includes the following:

Wholesale & International Banking

Loans disbursed, customer deposits and other transactions of corporate customers, both SOEs and private businesses including financial institutions and customers of overseas offices.

Institutional Banking

Loans disbursed, customer deposits and other transactions belonging to customers of Ministries, Institutions and Universities.

Enterprise & Commercial Banking

Loans disbursed, customer deposits and other transactions belonging to medium/commercial scale customers.

Retail Banking

Loans disbursed consist of program and consumer loans as well as retail deposit products, services, and other investments to encourage closed loop transactions of individual customers to MSMEs.

Treasury

Related to the Bank's treasury activities such as foreign exchange, money markets, fixed income and derivative.

Subsidiaries

All transactions carried out by Subsidiaries engaged in insurance, consumer financing, banking, venture capital, securities and investment management.

Head Office

Managing BNI assets and liabilities other than those managed by other operating segments, including receiving cost allocations for providing centralized services to other segments as well as income/costs that are not allocated to other reporting segments.

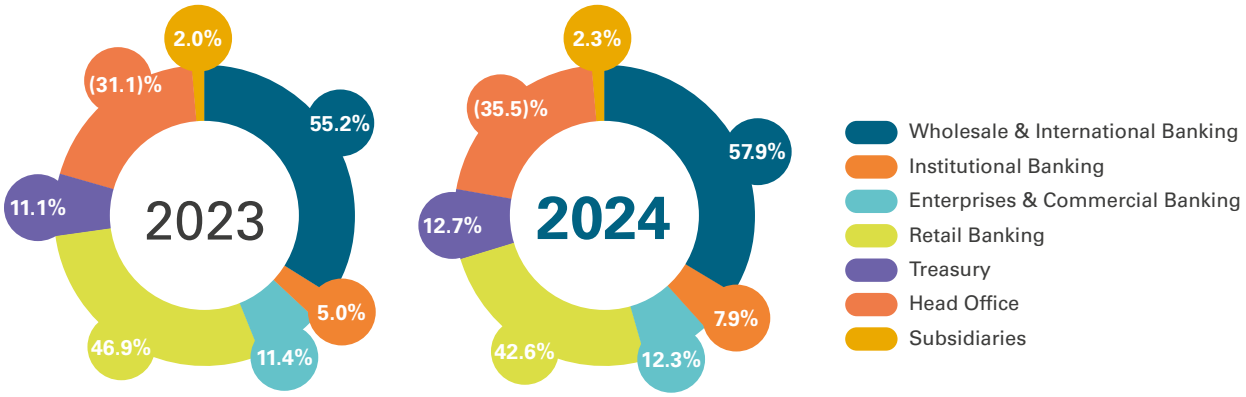
Presented below an overview of the Operating Segment business, presented below is the contribution per segment to BNI's profit, loan disbursed, and Third Party Funds (DPK) collection.

Operating Segment Profit and Loss

Operating Segment	2024		2023		Increase (Decrease)		
	IDR-billion	%	IDR-billion	%	Nominal (IDR-billion)	Percentage (%)	
Wholesale & International Banking	12,538	57.9	11,657	55.2	881	7.6	↑
Institutional Banking	1,702	7.9	1,053	5.0	649	61.7	↑
Enterprise & Commercial Banking	2,668	12.3	2,399	11.4	268	11.2	↑
Retail Banking	9,235	42.6	9,894	46.9	(658)	(6.7)	↓
Treasury	2,746	12.7	2,345	11.1	401	17.1	↑
Head Office	(7,683)	(35.5)	(6,564)	(31.1)	(1,119)	17.0	↑
Subsidiaries	509	2.3	421	2.0	88	20.8	↑
Adjustments and Eliminations	(46)	(0.2)	(99)	(0.5)	53	(53.9)	↓
Operating Segment Net Profit and Loss	21,669	100.0	21,106	100.0	563	2.7	↑

Profit and Loss Composition by Operating Segment

(%)

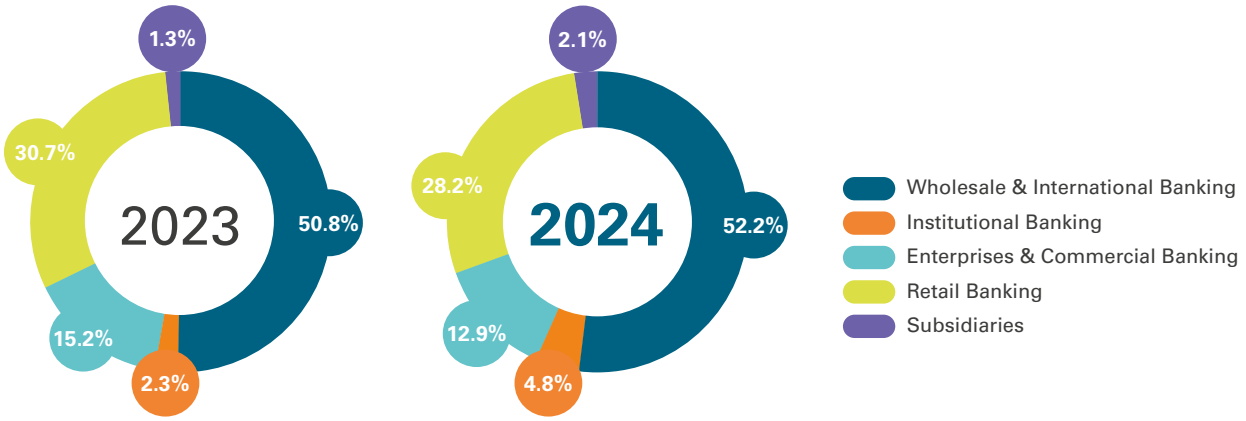


Loans per Operating Segment

Operating Segment	2024		2023		Increase (Decrease)		
	IDR-billion	%	IDR-billion	%	Nominal (IDR-billion)	Percentage (%)	
Wholesale & International Banking	405,376	52.2	353,141	50.8	52,235	14.8	↑
Institutional Banking	37,523	4.8	16,017	2.3	21,506	134.3	↑
Enterprises & Commercial Banking	100,117	12.9	105,519	15.2	(5,402)	(5.1)	↓
Retail Banking	218,534	28.2	213,235	30.7	5,299	2.5	↑
Subsidiaries	16,247	2.1	9,043	1.3	7,204	79.7	↑
Adjustments and Eliminations	(1,925)	(0.2)	(1,870)	(0.3)	(55)	2.9	↓
Total Operating Segment Credit	775,872	100.0	695,085	100.0	80,787	11.6	↑

Loans per Operating Segment

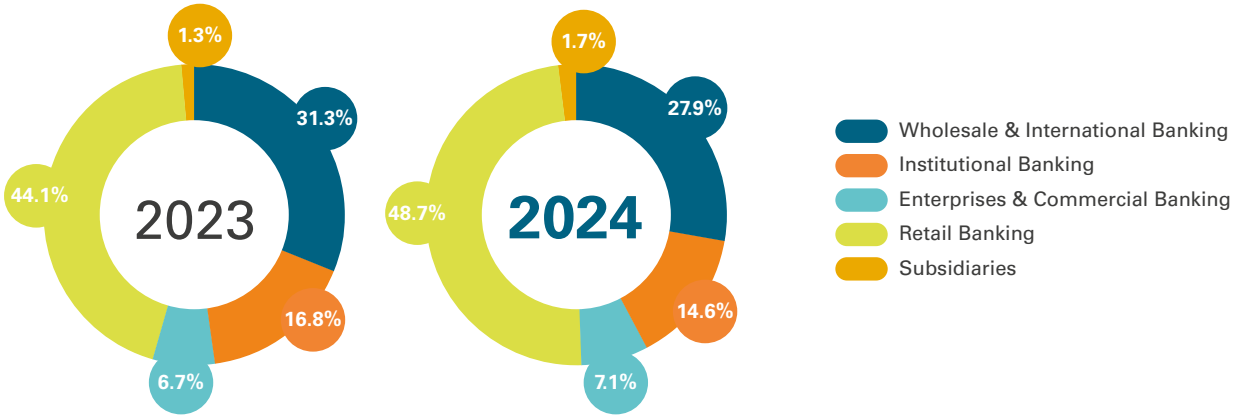
(%)



Third Party Funds per Operating Segment

Segment	2024		2023		Increase (Decrease)		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	
Wholesale & International Banking	224,894	27.9	253,649	31.3	(28,755)	(11.3)	↓
Institutional Banking	117,817	14.6	136,146	16.8	(18,329)	(13.5)	↓
Enterprise & Commercial Banking	57,400	7.1	54,701	6.7	2,699	4.9	↑
Retail Banking	392,561	48.7	357,213	44.1	35,348	9.9	↑
Subsidiaries	13,347	1.7	10,236	1.3	3,111	30.4	↑
Adjustments and eliminations	(508)	(0.1)	(1,215)	(0.1)	707	(58.2)	↑
Total Third Party Funds of Operating Segment	805,511	100.0	810,730	100.0	(5,219)	(0.6)	↓

Third Party Funds per Operating Segment
(%)



WHOLESALE & INTERNATIONAL BANKING

Wholesale & International Banking Solution is a service that offers one-stop financial solution with comprehensive support to help local and international customers with their business operations through loan distribution, fund management, and other transactional activities in a comprehensive manner.

For loan distribution, Wholesale & International Banking Solution Division offers the customers the following groups of solutions: Corporate Finance, Project Finance, Supply Chain Financing and Structured Finance. For fund management and transactional activities, BNI offers need-oriented solutions that help customers with their finance management.

Falling under the criteria in Wholesale & International banking (WHI) are non-individual customers such as private companies, SOEs, Multi National Company (MNC), non-banking financial institutions and financial institutions with the following parameters:

Wholesale & International Banking (WHI) Customer Profile Parameters

Parameter	Customer Profile
Company Size	Companies with Gross Annual Sales (GAS) > IDR1.5 trillion (including business groups) and Maximum Loans > IDR500 billion and/or Average TPF > IDR100 billion.
Customer	a. Domestic: 1. Globe's 150 Richest Indonesians and its groups; Forbes 500 and its groups; LQ45 and its groups; SOEs and its groups; Tbk Company and its groups; Non-Tbk Companies and its groups. 2. Bank and Non-Bank Financial Institutions; Regulatory and Non-Regulatory Pension Funds; State Owned Banks Subsidiaries; Indonesian Financial Group (IFG); Fintech related to financing. 3. Multi National Companies (MNC) Corporate segment companies which majority shares or more than 50% shares owned by foreign entity. b. Overseas: Loans and Funds in Overseas Branches managed by the Overseas Offices.

Competitive Advantage and Wholesale & International Banking Innovation

Competitive Advantage

BNI affirms its position as the Indonesian bank with the largest global network, consistent with the government's vision to make it an institution with global capacity. BNI's international network covers Overseas Offices (KLN) spread across financial centers worldwide, such as Singapore, Hong Kong, Tokyo, London, New York, and Seoul. In addition, BNI is present through Representative Offices in Amsterdam and Sydney and Sub-Branches in Osaka, enabling wider reach to the global market. This presence strengthens BNI's role as a strategic partner in supporting international business while expanding access to financial services that contribute to Indonesia's economic growth on the global stage. With a focus on innovation, collaboration, and the best service, BNI continues to create new opportunities for customers and partners worldwide. BNI's Overseas Offices (KLN) have a strategic role in providing integrated financial solutions for Wholesale and International Banking customers abroad, including business groups and business partners such as suppliers and buyers of BNI debtors. BNI Overseas Office (KLN) actively contributes to financing top-tier syndicated loans. It offers special financing schemes, such as supply chain financing, to support the smooth running of the global supply chain and strengthen the stability of international business.

Through its extensive international network, BNI Overseas Office (KLN) supports the financing needs of large corporations in cross-border trade activities, including trade finance, foreign exchange risk management (forex), and treasury management. BNI Overseas Office (KLN) serves as a strategic partner for companies who seek to expand their operations to international markets with the offerings of various services such as advisory, project financing, and structured financing.

BNI Overseas Office (KLN) has been rigorous in facilitating cross-border trade transactions, from trade settlement to cross-currency payments, to ensure seamless operations of its corporate customers. With a keen focus on the wholesale segment, BNI makes continuous innovations to bring financial solutions designed to help Indonesian pursue global growth and increase their competitiveness in the international market.

As a form of commitment to the Indonesian diaspora, the BNI Overseas Office (KLN) offers support to diaspora entrepreneurs overseas through financial solutions designed to support their business development and match their business with that of Indonesian entrepreneurs through the Xpora program. BNI helps diaspora entrepreneurs contribute to strengthening the Indonesian economy while strengthening cross-country business relations.

Through synergy with various parties, the BNI Overseas Office (KLN) also supports the growth of Indonesian trade with other countries and foreign investments into Indonesia, consistent with the Company's strategy to strengthen its global network and deliver the best service to corporate customers and diaspora entrepreneurs.

Wholesale & International Banking Segment Strategy in 2024

The Commitment of Wholesale & International Banking for BNI is to provide comprehensive solutions and take strategic steps as priorities in maintaining solid performance and delivering optimal income. Given below are some of the strategies implemented by Wholesale & International Banking in 2024:

Productivity and Profitability of Wholesale & International Banking Segment

1. Portofolio strategy
   a. Focusing on priority sectors that have a positive impact on increasing potential market share, credit asset quality and BNI profitability, including energy, agribusiness, manufacturing, telecommunications and digital economy sectors.
   b. Increasing BNI's ESG portfolio exposure by expanding into new renewable energy, energy efficiency, pollution prevention and control, management of natural resources and sustainable land use, environmentally friendly transportation, green buildings, or other industrial sectors that apply ESG principles.
   c. Implementing a one-stop financial solution designed according to the needs of each customer through collaboration with related divisions and subsidiaries.
2. Business strategy
   a. Implementing the "Three Pronged Business Model" by providing transaction solutions to correspondent banks in Indonesia, especially local banks and BPD. Business expansion into the platinum and gold segments and collaboration with new banks are top priorities.
   b. Providing integrated solutions by prioritizing cross-selling of BNI and subsidiary products. In addition, the focus of the strategy is also prioritized with client diversification and the development of a more efficient system.
   c. Collecting healthy quality third-party funds, by offering transactions in one integrated platform and ease of transactions through single sign-on using BNIdirect so that BNI cash management can be the main choice for corporate customers.
   d. Making BNI International Desk a Foreign Direct Investment (FDI) Advisory Unit that provides the best solutions for foreign companies through collaboration with strategic stakeholders, including the Ministry of Investment, Kemenko Marves, KADIN, and related business or entrepreneur associations.

WHOLESALE & INTERNATIONAL BANKING PRODUCTIVITY AND PROFITABILITY

Wholesale & International Banking Segment Productivity

Productivity	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Total Loan	**405,376**	**353,141**	**52,235**	**14.8**	↑
Total Third Party Funds	**224,894**	**253,649**	**(28,755)**	**(11.3)**	↓
Current Accounts	150,108	197,876	(47,768)	(24.1)	↓
Savings	447	1,070	(623)	(58.2)	↓
Deposit	74,339	54,703	19,637	35.9	↑

Wholesale & International Banking Segment Profitability

Profitability	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Net interest income	10,122	11,447	(1,325)	(11.6)	↓
Other operating income	4,809	4,615	194	4.2	↑
Other operational expenses	(4,467)	(4,880)	413	(8.5)	↓
Establishment of allowance for impairment losses	2,073	475	1,598	336.4	↑
Operating profit	12,538	11,657	881	7.6	↑
Net non operating income (expenses)	-	-	-	-	
Profit before tax expense	12,538	11,657	881	7.6	↑

In 2024, Wholesale & International Banking Segment credit grew by 14.8% YoY, with a laid focused on top tier clients by adding diamond plus criteria for higher quality growth. Meanwhile, Third Party Funds were corrected by 11.3% YoY, in line with the Bank's policy of focusing on quality and healthy third party funds.

In terms of profitability, profit before tax was IDR12,538 billion or an increase of 7.6% compared to the previous year. The increase was driven by the growth of other operating income of 4.2% which was dominated by Fee Based Income, consistent with the growth in transaction volume with one of its strategies, which was to optimize BNIdirect that offers a one-stop, need-based solution and easy transactions for customer and Syndication business. Another driver of profitability than increasing growth in other operating income was the more efficient CKPN expenses that resulted from the successful improvements in credit quality in the Wholesale & International Banking segment.

Prospects, Potential and Strategy of the Wholesale & International Banking Segment in 2025

As one of the main driving forces of BNI's business, the Wholesale & International Banking segment is committed to healthy and sustainable growth. This optimism will continue in 2025, especially since the Government introduced 8 missions (asta cita) that will be the catalysts for Indonesia's economic growth. To face the upcoming year's challenges and opportunities, BNI's Wholesale & International Banking segment will execute the following strategic plans:

Portfolio strategy

- Continuing the main focus of the business portfolio on the sectors:
  a. **Prime,** which are sectors with proven high GDP growth and high productivity such as construction, transportation & warehousing, mining & excavation, information & telecommunications and electricity & gas.
  b. **Potential**, which are sectors that have shown low GDP growth and high productivity such as manufacturing, accommodation & food provision, real estate and non-bank finance.
  c. **Sectors that are the current focus of the government in the asta cita** such as agro-maritime, education, healthcare, digital economy, food & beverages.

Business strategy

a. Offering a one-stop financial solution that suits the needs of corporate customers and corporate partners through collaboration with related divisions and subsidiaries to make BNI through the Wholesale & International Banking sector a customer choice as they expand their companies sustainably.
b. Strengthening its position as a global capacity bank as BNI will play a role as an Investment Gate and International Desk as a Foreign Direct Investment (FDI) Advisory that offers the best solutions for foreign companies through collaboration with strategic stakeholders.
c. Making BNI a "Bridge to Indonesia" especially for global banks that do not have or have a limited presence in Indonesia by utilizing BNI Overseas Offices (KLN) and BNI's domestic network.



DARRICK ROCHILI

Chief Innovation Officer (CIO)
at PT Espay Debit Indonesia Koe
(DANA)

On behalf of DANA Indonesia, we extend our heartfelt gratitude to BNI for the unwavering support and collaboration in advancing financial inclusion across Indonesia.

This strategic partnership has empowered us to introduce innovative solutions that simplify access to secure and reliable digital financial services for the community. BNI's support serves as a crucial pillar for DANA as we continue to expand digital adoption and broaden our reach to various segments of society.

We firmly believe that the synergy between DANA and BNI will generate significant value for users while reinforcing an inclusive and sustainable financial ecosystem in Indonesia. Together, we remain optimistic about driving innovation and fostering business growth in the years ahead.



ROBBY SETIABUDI MADJID

Director of Finance and
General Affairs
PT Petrokimia Gresik

On behalf of PT Petrokimia Gresik, we extend our sincere appreciation to BNI, as our partner, for its unwavering support in assisting us with the implementation of key government programs in Indonesia.

Collaborating with banks has proven to be a highly effective strategy in advancing the government's food security and self-sufficiency initiatives. Through this partnership with BNI, we have been able to successfully execute programs entrusted to us.

BNI consistently delivers comprehensive, accurate, and responsive services tailored to our needs in ensuring the sustainability of Indonesia's agricultural sector by offering financing options, streamlined digital payment systems, and a more effective financial transaction ecosystem.



BAYU ADJIE MEGANANDA

Executive Vice President
Treasury Division
PT PLN (Persero)

The collaboration between PLN and BNI has spanned over 40 years, with PLN's achievements to date being inextricably linked to BNI's support, which began with financing and has since evolved into comprehensive financial solutions for both corporate and individual segments across the PLN Group.

BNI's systems have continuously innovated in line with technological advancements, thereby facilitating our daily operational transactions with greater ease and efficiency. This steadfast partnership strengthens our optimism for continued growth and development alongside BNI.



HERI SUPRIADI

Director of Finance and
Risk Management
PT Telkom Indonesia

BNI has served as a strategic partner to Telkom for over 50 years, this can be realized because this relationship is built on professionalism and alignment with the business strategies of both companies.

We sincerely hope that this enduring partnership will continue to drive sustainable business growth and unlock greater opportunities for advancement in the future, and ultimately, will create enhanced value for both organizations, enabling both Telkom and BNI to thrive together as better companies, while making meaningful contributions to society and the nation of Indonesia.

INSTITUTIONAL BANKING

The Institutional Banking Business Segment provides banking products and services for Ministries, agencies or institutions sourced from the State Revenue and Expenditure Budget (APBN). The banking solutions provided include management of savings services (current accounts and deposits), distribution of ASN salaries and performance allowances, distribution of social assistance, state revenues (Tax, PNBP, etc.), digital banking (virtual accounts, platform/ecosystem collaboration, and others), domestic/foreign loans and other banking services to meet the needs of Ministries, agencies or institutions so that BNI can serve the business ecosystem as a whole.

The Institutional banking business segment Customers are divided into clusters of the Ministry of Finance, Coordinating Ministry for Maritime Affairs and Investment (Marves), Coordinating Ministry for PMK, Coordinating Ministry for Political, Legal and Security Affairs, Coordinating Ministry for the Economy, State Agencies/Institutions, Ministry of Education, Culture, Research andTechnology, Self-Regulatory Organization (SRO), SKK Migas Group , Social Insurance and Higher Education which includes Public Service Agencies, Work Units and Regional Government.

Institutional Banking Customer Profile Parameters

Parameter	Customer Profile
Institutional Banking	Ministries; State institutions; Agencies managed other than at the Head Office level; Education & Research Institutions (Top 100 Universities/Colleges determined by Dikti Kemendikti Saintek); Upstream & Downstream Oil and Gas regulatory institutions; Government-owned Social Security Providers; Regional Governments with special criteria.

Institutional Banking Competitive Advantage and Innovation

The Institutional Banking Business involves Liquidity Support in the distribution of the APBN, as a Gate Opener for acquiring ecosystems and APBN derivative businesses, as well as an agent of development as a partner of Ministries, Institutions and Universities in implementing Government programs including Health Operational Assistance (BOK) Puskesmas, Pre-Employment Card Program, Smart Indonesia Card (KIP), Smart Indonesia Program (PIP) and other Social Assistance.

The Institutional Banking Segment has digitized state financial services in its products such as migrating Ministry current accounts into virtual accounts equipped with a Cash Management System (CMS), Government Credit Card (KKP) and digital solution (Govtech) to support Government Programs, the APBN ecosystem and value chains, making BNI a partner in daily operational transactions, and playing a role in providing advocacy within Ministries, Institutions and Universities.

Institutional Banking Segment Strategy for 2024

Here are the activities that BNI rigorously carried out in 2024 to expand its Institutional Banking segment business:

1. Had active participation in distributing and optimizing the APBN as one of the sources of liquidity that were allocated to Ministries, Institutions, Universities, and Public Service Agencies (BLU)/Work Units.
2. Laid a focus on the growth of third-party fund collection from transactional receipts of Institutions and BLUs, contribution receipts, tuition payments at Universities, and increasing the DHE SDA Customer Fund Account.
3. Increased Fee Based Income by increasing financial transactions in optimizing APBN and Non-APBN transactions at BNIdirect, Foreign Exchange Trading, Bank Guarantees, and Custody.
4. Increased the growth of domestic/foreign loans at the Ministry of Finance, Institutions, and Universities and monitored the segment worked the commitment it had in the pipeline to maintain sound credit quality.
5. Became a gate opener for BNI to develop a business ecosystem and become an Agent of Development at Ministries, Institutions, and Universities.
6. Initiated services and advocacy to maintain healthy relations and BNI's existence in the business ecosystem and value chain with the segment's customers such as Ministries, Institutions, and Universities

7. Increased the acquisition of more Work Unit (Satker) to make BNI a financial partner to support and make Government Programs, Teacher Allowances, and Various Other Allowances a success.
8. Optimized Govtech as a digitalization solution for the financial ecosystem and distribution of Government Programs from Ministry, Institution, and University Customers which aims to increase low-cost fund deposits (CASA)
9. The Institutional Banking segment undertook several initiatives to develop derivative businesses, including:
   a. Collaborated with Regions, Centers, Branches, and Subsidiaries to execute business strategies that focused on improving the performance of the value chain of Ministry, Institution, and University customers to optimize the absorption of APBN funds and credit distribution to third parties (vendors, work units and BLU).
   b. Worked in synergy with Subsidiaries in providing complete solutions to customers to improve business achievements with the Parent Account Management (PAM), Regional Account Management (RAM), and Subsidiaries Account Management (SAM) execution models.
10. To become the best financial partner, the Institutional Banking segment remained committed to continuous people development in developing human resource competencies and capabilities.

PRODUCTIVITY AND PROFITABILITY OF THE INSTITUTIONAL BANKING SEGMENT

Productivity of the Institutional Banking Segment

Productivity	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Total Loans	**37,523**	**16,017**	**21,506**	**134.3**	↑
Total Third Party Funds	**117,817**	**136,146**	**(18,329)**	**(13.5)**	↓
Giro	51,806	51,013	793	1.6	↑
Saving	534	440	94	21.4	↑
Deposit	65,477	84,693	(19,216)	(22.7)	↓

Profitability of the Institutional Banking Segment

Profitability	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Interest income - net	2,560	1,821	739	40.6	↑
Other operating income	139	119	20	16.8	↑
Other operational expenses	(977)	(906)	(71)	7.9	↑
Establishment of allowance for impairment losses	(19)	18	(37)	(205.6)	↑
Operational profit	1,702	1,053	649	61.7	↑
Non-net operating income (expenses)	-	-	-	-	
Profit before tax expense	1,702	1,053	649	61.7	↑

In 2024, the Institutional Banking segment focused on increasing Transactional Giro through closed-loop transactions in the Institutional Banking customer ecosystem. On a YoY basis, third-party funds were corrected by 13.5%, corresponding to the strategy to generate quality and sustainable third-party funds. In terms of asset, credit disbursed reached IDR37,523 billion, up 134.3% YoY with the largest contribution from financing the defense equipment sector (main weapon system).

In terms of profitability, the Institutional Banking segment delivered IDR1,702 billion in profit before tax, contributed by an increase of 40.6% in net interest income from the previous year's figure. Other operating income (fee-based income) reached IDR139 billion, also an increase of 16.8%, sending positive signal of BNI's increasing role, especially in encouraging operational transactions through Ministries, Institutions, or Universities.

Institutional Banking Business Prospects in 2025

The Institutional Banking segment foresees that the potential of business development in 2025 will remain enormous as we plan to focus on business expansion to gain from the Government's priority focus on Food Security, Energy & Water, Health Services, and Strengthening Education. The Institutional Banking to increase BNI's market share in the distribution of the State Budget, penetration, and derivative businesses in Ministries/Institutions, Self-Regulatory Organizations (SRO), Universities, and Social Insurance.

With a supportive scheme to absorb some of the State Budget funds, the institutional banking segment will gain from the business ecosystem and value chain of institutional customers such as ministries, institutions, and universities to increase CASA with a focus on closed-loop transactions and optimized customer transactions. Further, the Institutional Banking segment will acquire Ministries/Institutions that can give access to corporate partners to the value chain to increase low-cost funds (partner DPK and employee payroll), consumer loans, and the business banking ecosystem.

The 2025 Draft State Budget for Ministry/Central Institution Expenditure is planned at IDR976.8 trillion. Other than for inclusive and sustainable economic growth, the budget will be allocated to multi-year projects, strengthening the main weapons system (alutsista)/special material equipment (almatsus) and flagship programs that support short-term fiscal policy strategies.

Institutional Banking Work Plan for 2025

The upcoming 2025 expects further recovery and improvements in the domestic economy despite an equally challenging global economy. As it moves ahead, the Institutional Banking segment will execute the following strategies:

1. The State Budget is still one of the sources of liquidity through optimization of revenues and expenditures (transactional) in Ministries, Institutions, and Universities.
2. Optimize the collection of third-party funds from government programs, Institutional and BLU transactions, Receipt of Contributions, and payment of tuition fees at Universities, and Increasing the DHE SDA Customer Fund Account.
3. Increase Fee Based Income through increased financial transaction cooperation, namely BNIdirect, Foreign Exchange Trading, Bank Guarantee, and Custody.
4. Increase the number of Work Unit (Satker) acquisitions to become banking partners through comprehensive financial solutions that support and succeed Government Programs.
5. Optimize and develop customized digital solutions (Govetch) as an entry point for the financial ecosystem in digital transaction services for Ministry, Institution, and University Customers which aims to generate cheap CASA and Fee Based Income (FBI) and accelerate and monitor ongoing projects.
6. Execute business strategies with a focus on improving the performance of the value chain of Ministry, Institution, and University customers to provide customer solutions through optimization and collaboration with Regions, Centers, Branches, and Subsidiaries (RAM and SAM) in optimizing the absorption of APBN funds and credit distribution to third parties (Vendors, Satker, and BLU).
7. Pursue higher credit growth of Ministry, Institution, and University Customers through domestic/foreign loans, monitor how the plan of existing pipeline/commitments is realized, and maintain credit quality.
8. Run continuous people development through training to create reliable human resources.



DENNI PUSPA PURBASARI M.SC., PH.D

Executive Director
Pre-Employment Program
Management Office (PMO)

As the government account management partner of the Pre-Employment Program funds, BNI is a very important part of the success of the Pre-Employment journey.

BNI can keep up with the pace of the Pre-Employment program which relies on technology to run the program with extraordinary speed and large-scale operation excellence, but still always strives to provide various innovations in Virtual Account management and distribution of incentives, payment of training costs, so that the implementation of the Pre-Employment Program can serve faster, more transparent, accountable and auditable. Together with BNI, the Pre-Employment Program has succeeded in reforming the Indonesian government to distribute aid funds to the community (G2P) by providing voice and choice. With BNI as a strategic partner, Pre-Employment is able to build public trust in good public services and still have a significant impact on Indonesia.



PROF. DR. ALI GHUFRON MUKTI, M.SC., PH.D., AAK.

President Director of BPJS Kesehatan

BNI is one of the strategic partners that strongly supports the success of the National Health Insurance (JKN) program managed by BPJS Kesehatan.

Through its comprehensive services, BNI provides full support ranging from channeling for payment of JKN contributions and health service guarantees, to management of operational and investment funds. All of these services are supported by BNI business units, such as transactional banking, securities, and custodial services. Thanks to this synergy, BPJS Kesehatan can carry out its duties as a health social security provider more optimally, especially in financial management.

We greatly appreciate BNI's contribution in supporting the realization of better health services for the people of Indonesia.



DJOKO SISWANTO

Head of SKK Migas

BNI is a strategic partner to SKK Migas, playing a pivotal role in driving digital transformation within the upstream oil and gas sector

The partnership between SKK Migas and Bank BNI has delivered highly positive impacts. The solutions provided by Bank BNI are highly relevant and aligned with the needs of the upstream oil and gas industry, including collaboration in funding for upstream oil and gas project development, as well as the implementation of digital technology to enhance transparent and accountable financial management for SKK Migas, Contractor Cooperation Contracts (KKKS), and their partners.

The SKK Migas Fund Management and Trustee Dashboard and the IOG E-Commerce Platform play an important role in supporting the upstream oil and gas ecosystem, which we greatly appreciate.

Hopefully, Bank BNI's commitment and innovation in providing solutions that are relevant and support the needs of the upstream oil and gas industry will increase, always accompanied by Bank BNI's initiatives in encouraging digital transformation and improving better governance, which has a positive impact on the progress of the upstream oil and gas industry, a pillar of national energy security.



PROF. DR. OVA EMILIA, PHD

Rector of Universitas Gadjah Mada (UGM)

BNI stands as an innovative and strategic trusted partner in realizing sustainable financial services.

We extend our gratitude to BNI for being a trusted partner to UGM, supporting the advancement of education, research, and community service through its comprehensive financial service programs.

May BNI continue to enhance its innovations and strategies for sustainable services, fostering the growth of a high-quality financial ecosystem within higher education institutions in the years to come.

ENTERPRISE & COMMERCIAL BANKING

In the Enterprise & Commercial Banking segment, BNI continues to expand business through the Implementation of the New Way of Working (NWOW) to make customer management more focused on distribution with agreed capabilities. Enterprise Banking is directed at specialization in the economic sector, while Commercial Banking at geographical control through the establishment of Commercial Banking Division 1, which manages the Sumatra and Jabodetabek areas and Commercial Banking Division 2 which manages the Java (non-Jabodetabek), Kalimantan, Bali, Nusa Tenggara, Sulawesi, Maluku, and Papua areas.

Enterprises & Commercial Banking Customer Profile Parameters

Parameter	Customer Profile
Enterprise Banking	Companies with Gross Annual Sales (GAS) > IDR300 billion to 1.5 trillion (including business groups) and Maximum Loans > IDR150 billion to 500 billion and/or Average TPF > IDR50 billion to IDR100 billion.
	Loans and Funds of Tbk company customers and their groups; Non-Tbk companies and their groups; Educational Institutions and Foundations.
Commercial Banking	Companies with Gross Annual Sales (GAS) > IDR30 billion to IDR300 billion (including business groups) and Maximum Loans > IDR10 billion to IDR150 billion and/or Average TPF > IDR10 billion to IDR50 billion.
	Loans and Funds of Tbk company customers and their groups; Non-Tbk companies and their groups; Educational Institutions and Foundations.

Enterprise & Commercial Banking Competitive Advantage & Innovation

The Enterprise & Commercial Banking segment manages the activities of all banking transactions carried out by Enterprise & Commercial segment customers and their business groups by providing a comprehensive solution (one stop solution) for customers in meeting their needs and managing their financial transactions, including through superior products such as BNI Mobile banking, BNI Cash Management, BNI Debit/Credit Card, Trade Finance, Bank Guarantee, Insurance , credit card, and Treasury products by collaborating with related units.

Enterprise & Commercial Banking offers competitive advantages for customers by providing the following:

1. Comprehensive solutions to support customer operations through a variety of asset products, liabilities, and transactional according to customer needs through channels available at branch offices, business centers, as well as flagship digital products such as wondr by BNI and BNIdirect.
2. Strong relationships with anchor clients that open up opportunities for value chain penetration from Corporate and Institutional segment customers who have derivative business potential in the Enterprise & Commercial Banking market segment.

Innovations carried out by the Enterprise & Commercial Banking segment to improve internal business processes and provide solutions that answer customer needs, including:

1. Development of economic sector-based risk acceptance criteria (RAC) and calibration of customer classification as Prime customers as an initial assessment of business potential.
2. Develop expansion guidance for priority sectors and develop expansion directions for sectors in quadrant 1 (sectors to be pushed).
3. Sustainability Linked Loan (SLL) scheme and special team to support a sustainable economy in accordance with Environmental, Social. & Governance (ESG) principles for Enterprise customers.

Enterprise & Commercial Banking Segment Strategy for 2024

In 2024, Enterprise & Commercial Banking Business remained focused on quality growth and credit quality improvements. This quality business growth was pursued through strengthening pipeline management by developing risk acceptance criteria (RAC) to screen high-quality customers. In addition, expansion was directed at target markets within top tier players in priority sectors in each region, export players, value chain/supply chain of Corporate Banking customers, and other potential customers.

The general strategies explained above for Enterprise & Commercial Banking in 2024 are then translated into action steps (quick wins) as follows:

1. Quality & Sustainable Business Growth
   a. Expansion of entrepreneurs in the to-be-push sector quadrant (quadrant 1), those with proven sustainable growth prospects
   b. Improving monitoring of business activities in all centers through connect tools to increase productivity and support the acceleration of pipeline management processes.
   c. Increasing ESG-based portfolios through major players in ESG-based industries in each Region.
   d. Optimizing value chain financing from corporate business anchors through SCF, SPAN, DHE and other financing schemes.

2. Increasing Funds & Transactions
   a. Optimizing data management and data analytics to increase business potential and customer cross-selling for Transaction banking products such as cash management, trade finance, escrow, payroll and so on
   b. Encouraging customer financial activities through cash management as a transaction solution.
   c. Collaboration with the Transaction Banking unit to improve customer transaction platform to meet future needs.
   d. Development, arrangement & strengthening of customer fund and transaction management functions for the Enterprise and Commercial Segments in each Region & Head Office.

3. Increasing Customer Management Capabilities & Competencies
   a. Continuous development of human resources in technical & analytical skills by implementing industry analysis training through in-class and on the spot learning programs.
   b. Strengthening the System Integrated Monitoring tools that can monitor debtor conditions to get the right account strategy for each customer
   c. Developing leadership skills and team potential, through coaching and mentoring programs.

ENTERPRISE & COMMERCIAL BANKING SEGMENT PRODUCTIVITY AND PROFITABILITY

Enterprise & Commercial Banking Segment Productivity

Productivity	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Precentage (%)	
Total Credit	**100,117**	**105,519**	**(5,402)**	**(5.1)**	↓
Total Third Party Funds	**57,400**	**54,701**	**2,699**	**4.9**	↑
Current Accounts	39,448	38,288	1,160	3.0	↑
Savings	2,343	3,313	(970)	(29.3)	↓
Deposit	15,609	13,100	2,509	19.2	↑

Enterprise & Commercial Banking Segment Profitability

Profitability	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Precentage (%)	
Interest income - net	5,028	5,906	(879)	(14.9)	↓
Other operational income	2,783	2,097	686	32.7	↑
Other operational expenses	(2,599)	(3,050)	451	(14.8)	↓
Establishment of allowance for impairment losses	(2,545)	(2,555)	10	(0.4)	↓
Operational profit	2,668	2,399	269	11.2	↑
Non-net operational income (expenses)	-	-	-	-	
Profit before tax expense	2,668	2,399	269	11.2	↑

In 2024, Enterprise & Commercial Banking Segment posted a total Credit of IDR100,117 billion, corrected by 5.1% in line with its strategy to focus on improving asset quality. Meanwhile, the segment posted Third Party Funds of IDR57,400 billion, up 4.9% YoY, driven by optimization of debtor and customer transactions at BNI.

On the profitability side, the Enterprise & Commercial Banking segment posted a profit before tax of IDR2,668 billion, up 11.2% YoY. The largest contribution to the increase came from the increase in Other Operating Income. The increase was in line with the increase in Fee Based Income which reflected BNI's stronger transactional product penetration into the customers of Enterprise & Commercial Banking segment customers, as optimal recovery efforts for low-quality assets. In terms of asset quality, the segment managed to press CKPN Expense to -0.4% YoY, backed d by improvements in the asset quality of the Enterprise segment, while for the Commercial segment, BNI took prudent steps in anticipating debtor conditions in the future that aligns with the Expected Credit Loss (ECL) concept.

Enterprise & Commercial Banking Business Prospects for 2025

BNI sees as one of the catalysts for growth the government's supportive policy direction of industrialization, such as in the downstream sector, as it will give added values, reduce imports, and increase exports. Therefore, in 2025, the Enterprise & Commercial Banking segment will further strengthen quality and sustainable business growth with a primary focus on the following:

1. Explore the business potential of the target market, determined based on the priority sectors and value chain of Corporate Banking customers, including sustainable economic sectors in line with strengthening the ESG portfolio.
2. Implement initiatives for quality business growth by digitizing loan monitoring & processes through RM Tools (Connect). Single Integrated Monitoring Tools (SIMON), and end-to-end loan tools and initiatives in the 2024-2028 Corporate Plan.

Enterprise & Commercial Banking Work Plan for 2025

In 2025, the Enterprise & Commercial Banking segment will implement a work plan and back it up with its comprehensive execution, in line with the aspirations in the 2024-2028 Corporate Plan formulated as follows:

1. Quality & Sustainable Business Growth
   a. Business growth in priority sectors by forming customized RM and product coverage and identifying target sectors in each region through evaluation of sector growth, NPL, risk rating, and field information from CMC
   b. Increasing Green & Sustainable Financing, targeting growth in renewable energy & eco-efficient products
   c. Financing Schemes for Government Programs, nutritious food financing schemes, housing development, school renovation & construction, national food barns, etc.
   d. Development & Evaluation of Credit Schemes with a laid focus on expansion of corporate business derivatives and SCF Diamond Corporate Client financing schemes
2. Increasing Funds & Transactions
   a. Increasing cross-selling for transaction banking products such as cash management, trade finance, escrow, and payroll
   b. Establishing a central team to monitor cross-sales and non-lending product penetration, by utilizing data from RM Connect
   c. Collaboration with the Transaction Banking unit to improve the customer transaction platform to meet future needs.
3. Improving Customer Management Capabilities & Competencies
   a. Learning journey and structured programs and building RM/SRM priority sector competencies
   b. Completing RM Connect with sales enablement features, e.g. wallet sizing, pricing & cross selling guides, performance tracking at portfolio and account levels
   c. Continuing the implementation of end-to-end credit tools to accelerate and digitize business processes while improving credit underwriting & monitoring.
   d. Optimizing RM/SRM and fulfilling the RM-BA1:1 ratio, as well as recruiting experience hires.



HENRY LEO
President Director
Paradise Perkasa Group

PT Paradise Perkasa wishes to express its sincere appreciation to BNI for the significant support provided in financing solutions tailored to our company's needs. Since 2018, BNI has consistently demonstrated an outstanding commitment to delivering financial solutions that are precised and also accommodate the dynamic nature of our business operations.

On numerous occasions, BNI has offered professional support, responsive services, and innovative solutions. The assistance provided extends beyond financing, with BNI serving as a strategic partner who deeply understands the challenges and opportunities faced by Paradise Perkasa and its Group.

The trust and continued support from BNI CMC Tangerang have made a positive contribution to the growth and success of our company. Therefore, we are pleased to wholeheartedly recommend BNI as a reliable and trusted financial partner for companies seeking exceptional service quality and sustainable business relationships. Wishing you continued success!



KPH. ARYA HIDAYAT ADISENO S.H, M.H.
President Director
PT SHA Solo

The Distributor Financing (DF) facility provided by BNI has been instrumental in enabling PT SHA Solo to conduct transactions as a partner of PT Pertamina Patra Niaga, offering a financing scheme tailored to our company's needs. This facility delivers key benefits, including flexibility in working capital and expedited payment processes for DO redemptions, thereby optimizing profitability and enhancing the company's bargaining power.The standout advantages of BNI's Distributor Financing facility include competitive rates, swift transaction processing, straightforward requirements, and guaranteed security.

With the DF facility in place, the trust of PT Pertamina Patra Niaga, our supplier, has significantly increased due to the assurance of timely payments. This directly impacts the potential for increased sales volume for PT SHA Solo and supports the strengthening of our relationship with PT Pertamina Patra Niaga.

We hope that BNI will continue to grow alongside the business development of PT SHA Solo and remain our primary banking partner in the future.

RETAIL BANKING

BNI retail banking is a business activity that provides integrated solutions for retail customers' needs including managing productive retail loans, consumer loans, third-party funds, transaction services and other financial solutions. Retail Banking includes the following segments:

1. Retail Productive banking is a segment that manages productive loans and non-individual third party funds up to IDR10 billion, through offering products and services of savings, current accounts, deposits, productive loans and banking transaction management.
2. Business Program is a segment responsible for managing business related to Government programs and productive loans up to IDR1 billion.
3. Wealth Management is a segment that manages high net worth individual (HNWI) customers with managed funds starting from IDR1 billion and above through excellent customer service which includes managing customer fund portfolios through banking, investment and insurance products.
4. Consumer Banking is a segment that manages individual customers with AUM (Asset Under Management) up to IDR1 billion by offering savings, deposits, consumer loan products and services, and banking transactions management.

Retail Banking Customer Profile Parameters

Parameter	Customer Profile
Retail Productive Banking	Individual and non-individual customers with Gross Annual Sales (GAS) up to IDR30 billion (including business groups) and maximum loan up to IDR10 billion and/or average TPF up to IDR10 billion.
Business Program	Individual and non-individual customers who have program loans (KUR) and other loans with a maximum loan of up to IDR1 billion.
Wealth Management	Individual customers with Asset Under Management (AUM)> IDR1 billion.
Consumer Banking	Individual customers with Asset Under Management (AUM) to IDR1 billion.

Retail Banking Competitive Advantage and Innovation

BNI offers financial solution services for customers through innovative digital channels, nation-wide outlet network, and overseas branch services that all offer convenient customer transactions. In the wholesale segment, BNI has built competitive edges on its solid corporate business portfolio and explored the ecosystem and customer business potentials. It is the services that drive the growth of the retail banking business.

BNI is committed to encouraging the growth of MSMEs in Indonesia and continues to innovate, offering fast and easy services for MSME partners through digitizing loan processing based on the BNI Move application (BNI Mobile Innovation for SME) and supporting MSMEs to go global through BNI Xpora which offers convenience for export-oriented MSMEs.

BNI also continues to increase the value proposition of products through product and service innovations, transformation and acceleration of the end-to-end credit process, as well as operational standards improvements. Innovations are made to create a range of customer-driven banking services by utilizing analytical data focused on payroll-based customers, business owners, and professionals. This step should increase customer loyalty and satisfaction while increasing the quality of the customer base.

The upcoming 2025 still offers strong potential for credit card transactions, and despite the increasingly available digital credit platforms, credit cards have their own market share, with various benefits and features offered to cardholders. This makes credit cards are still sought after across segments, both as payment tools and consumer credit needs.

Retail Banking Strategy in 2024

Here are some of the focuses of strategies that BNI successfully executed in 2024 for the retail segment:

1. Improving customer journey through launching wondr by BNI to increase customer transactions.
2. Focusing expansion on quality segments including top tier players, selected developers, & selected partners for both productive and consumer credit through improving business processes and increasing RM/Sales productivity.
3. Exploring the potential for inorganic business growth through linkage and joint financing through synergy amongst subsidiaries and selected partners.
4. Strengthening risk management through improvements in the scoring system and digital-based credit processes.
5. Strengthening the credit card business through innovation in issuing new products, revamping existing credit card products, adding strategic partners & strengthening digital features.
6. Encouraging MSMEs to Go Global through the Xpora program, exploring export-oriented customers both as direct and indirect exporters.
7. Establishment of the Product Life Cycle Enhancement Taskforce, aimed at aligning and refining the end-to-end product life management process at BNI for both existing and new products.

PRODUCTIVITY AND PROFITABILITY OF THE RETAIL BANKING SEGMENT

Retail Banking Segment Productivity

Productivity	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Total Credit	**218,534**	**213,235**	**5,298**	**2.5**	↑
Total Third Party Funds	**392,561**	**357,213**	**35,347**	**9.9**	↑
Current accounts	60,127	55,914	4,213	7.5	↑
Savings	253,381	226,180	27,201	12.0	↑
Deposits	79,053	75,119	3,934	5.2	↑

Retail Banking Segment Profitability

Profitability	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Interest income - net	20,890	20,114	776	3.9	↑
Other operational income	10,332	9,890	442	4.5	↑
Other operational expenses	(15,289)	(13,587)	(1,702)	12.5	↑
Establishment of allowance for impairment losses	(6,698)	(6,523)	(175)	2.7	↑
Operational profit	9,235	9,894	(659)	(6.7)	↓
Non-net operational income (expenses)	-	-	-	-	
Profit before tax expense	9,235	9,894	(659)	(6.7)	↓

In 2024, the Retail Banking segment managed to record growth in credit and third party funds of 2.5% and 9.9% respectively compared to the same position in 2023. This growth in third party funds was driven by the increase in savings account products to 12% in 2024. This is in line with BNI's strategy to encourage the increase of low-cost funds (current accounts and savings) and optimizing transactional banking by utilizing the potential of the value chain and consumer solutions for wholesale customers.

On the profitability side, the Retail Banking segment posted income before tax of IDR9,235 billion, or corrected by 6.7% YoY due partly to the Bank's anticipatory steps for the settlement of Non-Performing Loan assets in the Retail Productive and Business Program segments. Despite corrected profitability figure, Other Operating Income increased by 4.5% YoY, corresponding to the optimization of digital strategies through the wondr by BNI application, dominated by an increase in transactions that generate funding related fees.

Business Program & Retail Productive Banking

Business Program & Retail Productive Banking is a segment that manages small loans and non-individual third-party funds of up to IDR10 billion. This segment offers ease of financing access and ease of transactions for MSME.

Retail Productive Banking & Business Program supports the development and empowerment of MSMEs, through synergy and collaboration in the following 3 aspects:

Export & Diaspora MSMEs

- An empowerment program for export-ready MSMEs to compete in the global arena through the BNI Xpora Platform which helps develop their business more widely to the international market. The BNI Xpora Platform bridges exporters and importers and helps business matching to ensure seamless, safe, and convenient transactions. This program is also supported by 8 BNI Branch Offices overseas (Singapore, Hong Kong, Tokyo, New York, London, Osaka, Seoul, and Amsterdam) that also give easy access to funding and transactions for Export and Diaspora MSMEs.

Digital Value Chain

- In addition, for the convenience of its corporate customer business derivatives and partners, BNI also gives easy access to funding through digital-based value chain lending schemes, including through the BNIdirect Supply Chain platform that can accommodate financing needs for buying and selling transactions that help Corporations optimize working capital and cash flow management in working with MSME business partners.

Signature Ecosystem

- BNI encourages the formation of a superior ecosystem in each of BNI's service areas, specifically closely observing the large potential of the MSME segment, BNI provides a range of financing facilities, from People's Business Credit (KUR) to Commercial Credit with a focus on the low-risk segment production sector as a form of support for forming an MSME Go Global ecosystem through the MSME Xpora empowerment program, digitalization of MSME financial transactions in collaboration with startups for financial recording, and collaboration on online marketing access through e-commerce.

The three (3) focuses of BNI's strategy are the answer to the challenges faced by MSMEs, by making BNI a one-stop banking solution that encourages MSMEs to Go Productive, Go Digital and Go Global through the various conveniences it offers for MSMEs

Business Program & Retail Productive Banking provides a choice of financing solutions for customers who want to increase their business capacity by adding capital and providing financial services to make it easier for customers to transact, as follows:

1. Working Capital Credit (KMK)
   Is a credit used to increase a company's working capital, e.g., for purchases of raw materials, production costs, marketing, etc.
2. Investment Credit
   Medium or long-term credit for capital expenditures and services needed for the rehabilitation, modernization, or expansion of existing projects and the establishment of future projects.
3. Fast Trex Export Credit
   FastTrex is one of Xpora's solutions in supporting Go Productive MSMEs by providing easy and integrated financing for export-oriented MSMEs (direct and indirect).
4. Supply Chain Financing (SCF) Retail
   BNI Supply Chain Financing Retail (BNI SCF Retail) is BNI's financing solution to Corporate Partners through accelerating payment receipts from Bowheer and in making payments to Principals.
5. Credit to Linkage Institutions (KKLK)
   As a form of BNI's commitment to help develop financial institutions in Indonesia, BNI offers financing solutions in the form of Credit to Financial Institutions (KKLK). Credit to Financial Institutions is a credit facility provided to and/or through Financial Institutions and further distributed to end users through strategic alliances (cooperation).
6. Cash Collateral Credit (CCC)
   Cash Collateral Credit (CCC) is a credit secured by savings in the form of deposits/current accounts/ savings issued by BNI, which customers can use as additional working capital for customer businesses.
7. Bond Collateral Credit (BCC)
   This is a credit facility provided to individual and non-individual customers in the form of Limited Liability Companies (PT) with credit collateral in the form of tradable Government Securities (SBN) issued by the Government of the Republic of Indonesia. Customers can use this credit facility to get additional working capital for customer businesses.
8. People's Business Credit (KUR)
   People's Business Credit (KUR) is a subsidized financing program from the government designed to give Micro, Small, and Medium Enterprises (MSMEs) a broader access to capital.
9. BNI Wirausaha (BWU)
   BWU is a credit facility for productive businesses, both in the form of Working Capital Credit (KMK) and Investment Credit (KI), with a maximum credit of up to IDR 1 billion.

Business Program Performance & Retail Productive Banking

	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Total Loans	79,346	85,129	(5,783)	(6.8)	↓
Third Party Funds	97,959	80,250	17,709	22.1	↑
Fee Based Income	868	768	100	1.9	↑

Retail Productive Banking and Business Program segment credit was recorded at IDR79,346 billion in 2024 or corrected by -6.8% YoY, where the focus was on how to improve small credit the quality of the credit portfolio, which involved improving the credit underwriting process and strengthening the Loan at Risk portfolio management function. Third-party fund in this segment grew 22.1%, mainly driven by the growth of retail current accounts, while FBI grew 12.9% driven by an increase in customer transactions.

Consumer Retail Banking

The consumer retail segment manages individual customers in the affluent, upper mass and mass categories that are differentiated based on the management of AUM up to IDR1 billion. The customer business strategy focus in the consumer retail segment is based on the payroll business, professionals and business owners to selectively target solution-based financial transaction needs. These transaction needs are packaged in a profitable bundling package to create close loop transactions for all customers' financial activities.

The consumer retail segment offers a wide range of financial solutions for customers both through easy access to and financial services to facilitate customer transactions, as follows:

1. **Home Ownership Credit – BNI Griya**
   BNI Griya is a credit facility aimed at individuals for the needs of owning residential houses, apartments, shophouses and holiday homes (villas) for purchasing plots/land, construction, renovation, refinancing, take over and top up.
2. **Unsecured Credit – BNI Flexi**
   BNI Fleksi is a BNI Unsecured Credit product available to active employees and retirees who channel their income, payments and retirement benefits through BNI.
3. **BNI Instan**
   BNI Instan is a credit product guaranteed by Deposits, Savings, BNI Current Accounts and Government Securities (SBN) which can be traded.
4. **Credit Card**
   Credit cards are a consumer loan product as a means of payment using cards or virtual cards which can be used by individuals and corporations to make payments for obligations that arise, such as shopping transactions and/or cash withdrawals. BNI credit card products consist of:
   a. Regular Credit Cards, consisting of: BNI Visa Gold, BNI Mastercard Gold, BNI JCB Gold, and BNI Amex Vibe.
   b. Premium Credit Cards, consisting of: BNI Mastercard Style Titanium, BNI Visa Platinum, BNI JCB Precious, BNI JCB Ultimate, BNI Mastercard World, BNI Visa Signature, and BNI Visa Infinite.
   c. Co-Branding Credit Cards, consisting of Garuda BNI, BNI Pertamina, BNI Telkomsel, BNI Bank BJB, BNI LOTTE Mart, BNI Batik Air, BNI Siloam Hospitals, BNI XL Prioritas, and BNI MAP Club.
   d. Affinity Credit Cards, consisting of: University Affinity Cards, Alumni Association Affinity Cards, Community/Organization Affinity Cards, and Company Employee Affinity Cards.
   e. Corporate Credit Cards, consisting of: BNI Visa Corporate Card Gold, BNI Visa Corporate Card Platinum, BNI Mastercard Corporate Card, BNI Kartu Kredit Indonesia.
   f. Private Label Credit Cards consisting of: BNI Travelling Card, BNI Health Card, BNI Distribution Card, and BNI Gasoline Card.
   g. BNI Kartu Tunai is a revolving unsecured loan that can be converted into fixed installments, can only be used to make cash withdrawals at BNI branches or ATMs. BNI Kartu Tunai also collaborates with fintech companies by providing loans in the form of cash loans carried out with a peer to peer lending scheme.

To manage customer deposits or TPF, BNI has a variety of savings products to meet the needs of all customers, which include savings, current accounts and deposit products.

1. **Savings Products**
   a. Tabungan Plus (Taplus), is a savings account that provides PLUS services with various features and benefits;
   b. Taplus Bisnis, is a savings product intended for business actors and non-business actors, both individuals and non-individuals, which is equipped with features and facilities that provide convenience and flexibility in supporting business ventures;
   c. TAPPA (Taplus Employees/Members), is a savings intended for employees/members of a company/institution/association/professional organization that collaborates with BNI which functions as a means of savings, employee/member identity cards;
   d. Taplus Muda, is a savings product in the form of savings intended for young people with ages ranging from 17 (seventeen) years to 35 (thirty five) years;
   e. Taplus Anak, is a savings product to help teach children to save from an early age, intended for children under 17 (seventeen) years of age;
   f. Tapenas, is a term savings to help financial planning to realize future goals with more certainty through a monthly autodebit feature with higher fund development than regular savings.

2. **Current Account Products**
   The consumer segment offers Individual Giro products to its customers as escrow and transactional accounts. Together with other products, Individual Giro is offered to consumer segment customers in the form of a bundling package together with other consumer products. The focus of the offer is aimed at Business Owner customers as an effort to work on the cash-to-cash business cycle from upstream to downstream so as to create a one-stop-solution for Business Owner customers' finances.

3. **Deposit Product**
   BNI Deposito is a term savings in various currencies (IDR/USD/SGD/JPY/HKD/EUR/GBP/AUD) with attractive interest rates. BNI Deposito can be an investment choice for customers who want relatively higher returns.

Consumer Retail Banking Performance

Description	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Total Loans	132,083	122,510	9,573	7.8	↑
Third Party Funds	175,566	164,678	10,888	6.6	↑
Fee Based Income	6,241	6,236	5	0.1	↑

In 2024, the Consumer Retail Banking segment credit grew by 7.8%, driven by the growth of Griya and Fleksi products. This achievement points to the strategy to increase quality credit that is focused on selected partners. Meanwhile, third-party funds and the FBI grew by 6.6% and 0.1%YoY, respectively, where the growth of BNI's digital banking service transactions was in line with the launch of the wondr by BNI application.

Wealth Management

Wealth Management customers are classified into two segments based on total asset placement (AUM), namely BNI Emerald for individual customers who have a minimum total asset placement of IDR1 billion and BNI Private Banking for individual customers who have a minimum total asset placement of IDR15 billion. BNI Wealth Management synergizes with BNI Group and Top Tier Investment Managers in Indonesia to provide comprehensive wealth products, including mutual funds, bonds, treasury products, and Bancassurance.

Wealth Management Segment Performance

Description	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
AUM	204,318	181,222	23,096	12.7	↑
Net Interest Income	2,964	2,842	122	4.3	↑
FBI Investasi	288	269,4	19	6.9	↑

In 2024 assets under management (AUM) grew by 12.7%, largely driven by a growth of 25.0% in Bond AUM. This increase in AUM pushed a growth of 4.3% in Net Interest Income and 6.9% growth in FBI Investments.

Retail Banking Business Prospects for 2025

In 2025, Indonesia expects a further upward trend in its economy amidst high global economic uncertainty. This gives retail banking a strong outlook that it will remain the main driver of business growth. That has prompted the banking industry to make continuous improvements in digital capabilities, broaden financial inclusion and offer integrated solutions in order to improve customer experience and loyalty. All the possible occurrences present the Retail Banking segment with enormous opportunities that will allow it to keep expanding in the upcoming year.

To optimize this potential, BNI's strategy will focus on increasing transaction-based Retail CASA, sustainable development for digital channels, increasing business penetration from the corporate customer value chain, and offering product bundling packages according to customer needs as an effort to provide a one-stop solution for customers segment.

Retail Banking Work Plan for 2025

In 2025, the Retail Banking Segment is expected to become one of the main driving forces of BNI's business with the following strategic highlights:

1. Strengthen the development of the value chain business and wholesale customer ecosystem to drive the growth of retail CASA, increasing customer PHR and cross-selling products that focus on increasing closed-loop transactions.
2. Continuously develop wondr by BNI & BNIdirect to improve customer journey & customer transactions.

3. Increase transaction-based retail CASA with a focus on closed-loop transactions and increasing PHR to increase customer engagement.
4. Focus on quality expansion on top-tier developers & selected partners for consumer credit.
5. Focus on expanding productive credit to top-tier players in leading sectors of the Region and business ecosystems.
6. Improve credit quality through improving the underwriting process and enhancing risk culture.
7. Increase wealth business through increasing value proposition, strengthening RM, and developing global capacity.
8. Increase credit card business by focusing on acquisitions in quality segments, increasing digital channel transactions, and further exploring business ecosystems.
9. Encourage MSMEs to Go Global through the BNI Xpora program.



CUCUP RUHIAT
Owner of Rumah Tempe Azaki

To date, we have successfully exported tempe to countries such as Japan, South Korea, Taiwan, the United States, Hong Kong, Thailand, Australia, and Qatar, as well as tempe chips to South Korea, Japan, the Philippines, Australia, and Saudi Arabia. As our export business grows, it naturally brings its own set of challenges, one of which is finding trustworthy buyers. BNI, through its BNI Xpora program, has been instrumental in addressing this need. It has enabled us to showcase our soybean-based products and connect with potential buyers across the globe. To fellow SMEs, we can rise to the next level and go global. The key is having the determination and the drive to progress, and with BNI Xpora, that journey becomes a shared success. Keep pushing forward!



I GUSTI AYU AGUNG INDA TRIMAFO YUDHA
Commissioner of PT Bali Coklat

We extend our gratitude to Bank BNI RCC Denpasar for providing an additional Credit Facility to support the purchase of raw materials. This credit facility aligns perfectly with our needs, especially during this challenging year for cocoa cultivation. Many farmers have faced crop failures, leading to skyrocketing prices and limited supply. To ensure our inventory remains stable, we have had to increase our minimum stock levels (buffer stock), which, in turn, has heightened our working capital requirements.



REZA PERAZI ARMADI
President Director of PT Berdayakan Usaha Indonesia (Fintech Peer-to-Peer (P2P) Lending Company)

"Our collaboration with BNI aligns perfectly with our vision and mission to empower MSMEs across Indonesia. This partnership represents a shared commitment to expanding inclusive financial access for MSMEs, the backbone of Indonesia's economy. This synergy enables us to provide fast and tailored financing solutions for small and medium enterprises that remain underserved by conventional banking services. Through this collaboration, BNI and Batumbu reaffirm their joint commitment to creating a robust and inclusive financial ecosystem, empowering MSMEs, and strengthening Indonesia's economic resilience."



EKO KUSLEGOWO
CEO of Tall&Co Leather

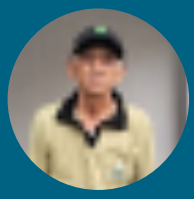
We extend our gratitude to BNI for providing funding to support our leather bag business. The KUR financing from BNI has been instrumental in helping us expand our operations.

The benefits we've experienced are significant—our business has grown, and we've had the opportunity to participate in bazaars and exhibitions organized by BNI. We hope to continue earning BNI's trust as one of its fostered partners.



FLORENTINA WIDARISNAWATI
CEO of Yasokhy

We are deeply grateful to BNI for supporting Yasokhy in its batik business. Through the KUR facility provided by BNI, we have received invaluable assistance in advancing our operations. BNI has greatly supported us and its other customers by facilitating participation in exhibitions, offering essential tools such as EDC machines and QRIS to enhance our business activities.



KOPI HARBOUR 25

Kopi Harbour 25 expresses its gratitude to BNI for the KUR loan, which has significantly helped coffee farmers run their businesses more smoothly and increase their revenue. We, as prosperous coffee farmers, are growing together with BNI.

TREASURY

Treasury Segment Activities

In the Treasury segment, BNI provides investment solutions while still prioritizing customer needs and risk types and offers the best banking products. Treasury business activities include foreign exchange (forex), money market, fixed income and derivative transactions. BNI Treasury is spread across Indonesia through head offices and regional offices (Treasury Regional Areas) in major cities in Indonesia, namely Medan, Batam, Palembang, Bandung, Semarang, Solo, Surabaya, Denpasar, Balikpapan, Manado and Makassar. BNI also provides web-based digital transaction solutions through BNIFX and through the BNI Mobile Banking application (Mobile FX and Secondary Bond Investment Features).

Variety of Treasury Products and Services

BNI Treasury products are classified into Transactional products, Investment products and Hedging products.

1. Transactional
   These transactional products consist of Forex-TOD, Forex-TOM, Forex-SPOT, and Forex-Bank Notes. Details related to transactional products are described as follows:
   a. Forex –TOD
      Buying and selling foreign exchange where the transaction agreement and transaction settlement are carried out on the same day.
   b. Forex –TOM
      Sale and purchase of foreign currency where transaction settlement is carried out 1 (one) working day after the transaction agreement date.
   c. Forex – SPOT
      Sale and purchase of foreign currency where transaction settlement is carried out 2 (two) working days after the transaction agreement date.
   d. Forex – Bank Notes
      Transactions involving the exchange of physical ownership of the currency (banknotes) involved in the transaction.

2. Investment
   Treasury investment products consist of Bonds, Depo Swap, and Market Linked-Dual Currency Investment (ML-DCI). Details related to investment products are described as follows:
   a. Bonds
      Bonds are proof of debt from the issuer which will be repaid at maturity in accordance with previously determined conditions and conditions. Bond transactions that can be carried out between the Treasury Division and Individual Customers include the following transactions:
      - The primary market including corporate bonds and non-retail Government bonds;
      - The secondary market including corporate bonds, Government retail bonds, bonds;
      - Non-retail Government and Government bonds of other countries.
   b. Depo Swap
      Depo Swap is an investment product in foreign currency with a maximum rate of return and 100% guaranteed investment principal. Depo Swap is a combination of forex transactions in the form of FX Swap and deposits. In this transaction, the customer exchanges their foreign currency with another foreign currency and at the same time exchanges

the foreign currency back in the future at the tenor and exchange rate determined at the beginning of the transaction agreement. The exchange rate gain on foreign currency exchange transactions (forex gain) is an optimal return on the customer's investment in placing funds.

c. Market Linked-Dual Currency Investment (ML-DCI)
Market Linked-Dual Currency Investment (ML-DCI) ML-DCI is a structured product, a combination of foreign currency savings products and FX Options. This product provides high returns when compared to conventional savings products as it combines savings products with a view of exchange rate movements. This product has the characteristic of being non-capital protected/ does not guarantee the investment principal.

3. Deposits
The Treasury Deposit products consist of Deposit on Call (DOC) and Money Market Account (MMA). Details regarding these deposit products are as follows:
   a. Deposit on Call (DOC)
      - Funds are placed for a minimum period of 3 (three) days up to 30 (thirty) days;
      - The interest rate is based on the interbank interest rate;
      - Can be withdrawn at any time;
      - Minimum placement is IDR100 million or USD75,000.
   b. Money Market Account (MMA)
      - Minimum term of fund placement is 1 (one) day up to 1 (one) year
      - Interest rate refers to interbank interest rate;
      - Can be disbursed at any time;
      - Minimum placement is IDR1 billion or USD100 thousand.
4. Hedging
   a. Forward Currency
      Buying and selling foreign currency where the transaction settlement is carried out more than 2 (two) working days after the transaction date. The exchange rate used in this forward transaction takes into account forward points.
      - Domestic Non-Deliverable Forward (DNDF)
        Standard (plain vanilla) foreign currency derivative transactions against the rupiah in the form of forward transactions with a fixing mechanism carried out in the domestic market. The fixing mechanism is a transaction settlement mechanism without movement of principal funds by calculating the difference between the forward transaction rate and the reference rate on a certain date specified in the contract (fixing date).
      - PAR Forward
        Par Forward is a derivative contract to carry out a series of sales/purchases of a currency (reference currency) against another currency (non-reference currency) in a period, where the settlement/delivery of funds (settlement) is carried out in more than 2 (two) working days after the date of the transaction agreement (trade date).
   b. Currency Swap
      'Buy and sell' or 'buy and sell' transactions of a currency against another currency carried out (simultaneously) at the same time with the same counterparty (customer).
   c. Currency Option
      An agreement to give the right and not the obligation of the seller (option writer) to the buyer (option holder) to buy or sell a certain nominal amount of currency for the future at a predetermined price (strike price) at or before a certain time (expiry date).
   d. Interest Rate Swap (IRS)
      An agreement between two parties to exchange a series of fixed interest payments (fixed rate) in one currency with a series or series of fluctuating interest payments (variable rate) in the same currency (or vice versa), without exchanging the loan principal.
   e. Overnight Index Swap (OIS)
      OIS is an interest rate derivative product, namely a contract/agreement between 2 parties to exchange interest rate flows in Rupiah periodically during a certain contract period, which is calculated using a daily interest basis (Daily Compounding). The transaction scheme is the same as the Interest Rate Swap (IRS), but the method for calculating interest is daily compounding with the overnight reference interest rate.
   f. Cross Currency Swap (CCS)
      An agreement between two parties to exchange loan principal and interest payments in a different currency. The exchange of loan principal uses the exchange rate at the start of the transaction.

g. Call Spread Option (CSO)
Call Spread Option is a Structured Product with a combination of 2 (two) Currency Option transactions, namely Buy Call Option (purchase of the right to buy a certain currency) and Sell Call Option (sale of the right to buy a certain currency), with nominal and term the same transaction time but with different strike prices for each Buy Call Option and Sell Call Option.
- Series of Call Spread
Series of CSO is a contract for a series of call spread options within a period.

Treasury Competitive Advantage and Innovations

Throughout 2024, BNI Treasury, as one of the key players in the market in Indonesia, continued to demonstrate excellent performance. This was reflected in the various awards received throughout the fiscal year, including: Best FX Bank for Structured Hedging Solutions and Proprietary Trading Ideas by Alpha Southeast Asia, Best FX Bank for Hedging Requirements (Corporates & FIs, CCS, IRS, Forward & Options) by Alpha Southeast Asia, Best Corporate Treasury Sales and Structuring Team by Alpha Southeast Asia, ,m,Best Trade Finance Bank in Indonesia by Alpha Southeast Asia, Best Price Taker - LSEG FX, Second Runner-Up Most Active Price Maker - LSEG FX.

In 2024, BNI launched a new version of its mobile banking app, wondr by BNI, which includes a new Foreign Exchange Transaction feature. This feature was introduced to make it easier for customers to perform foreign exchange transactions through wondr by BNI. With this feature, customers can conduct foreign exchange transactions more easily, quickly, and conveniently, with competitive exchange rates.

For treasury transactions, BNI always follows regulatory provisions from the Regulator, and is actively involved in developing market deepening, including as a Bank Indonesia Agent in carrying out monetary operations for market stability, and as a BNI Main Dealer actively is involved in the issuance of primary market bonds for SBN and SBSN carried out by the Government.

Treasury Segment Plan and Strategy in 2024

The Treasury has a mission to maintain a healthy liquidity condition, ensure strong capitalization, and contribute maximum profits through the execution of superior Treasury business operations as an active player in both the domestic and international markets. Throughout 2024, BNI Treasury implemented the following strategies:

Financial Strategy

1. Managed Rupiah and foreign exchange liquidity so that it is always in an efficient and profitable position.
2. Optimized excess liquidity on instruments that provide the best return (yield) while still paying attention to daily liquidity conditions and financial market conditions.
3. Increased the securities portfolio and forex trading book with measurable risks, both through the Primary Market and Secondary Market.
4. Optimized the banking book securities and NOP positions management by taking into account liquidity needs, customer needs, existing ratios, as well as domestic and global financial market conditions.
5. Optimized hedging product management to support increased hedging solution services to customers, increase FBI, and support financial market deepening.

Non-Financial Strategy

1. Develop/migrate the Treasury Management System (TMS) to support a more optimal Treasury business.
2. Increase synergy with related business units including Corporate Banking, Institutional Banking, Syndication & Corporate Solution, International, and Regions/Branches to acquire top tier and diamond clients including through regional sales.
3. Proactively provide education and offering hedging products to customers that can help them choose the right hedging solution according to their business characteristics and risk appetite for FX and Bonds products (Bond forward and Bond Option)
4. Develop the competence and capabilities of Marketers/RM/Front Liners in business units/ Regional Offices/Branch Offices related to Treasury products as a one-stop solution for customer needs and increasing cross-selling and market share from customer flow.
5. Serve as a treasury expert in providing knowledge enhancement literacy of Treasury products to internal and external parties including becoming a resource person and partner for regulators in the context of deepening the financial market.

6. Increase customer engagement, especially potential customers through customer loyalty programs, sharing sessions/customer gatherings/workshops related to Treasury products to increase the market share of Treasury transactions.
7. Determine effective & efficient marketing program strategies through above/below the line marketing in accordance with customer criteria and aggressive Treasury digital product marketing to increase the volume of forex, derivatives and bonds transactions from customer flow.

Productivity, Operating and Business Performance of the Treasury Segment

Fee Based Income Treasury

Fee Based Income	2024 IDR-billion	2023 IDR-billion	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Marketable Securities Related	1,859	1,217	642	52.7	↑
FX Related	1,261	1,020	241	23.7	↑
Total Fee Based Income	**3,120**	**2,237**	**883**	**39.5**	↑

BNI Treasury segment continues to focus on serving customer transaction needs, especially Forex Related and Marketable Securities transactions. In 2024, BNI Treasury recorded an increase in fee-based income of 39.5% (YoY) driven by an increase in customer transaction volume.

Prospects and Potential

Looking ahead, predictions suggest that certain challenges will still mark global and domestic economic growth. Despite that challenging outlook, the domestic market is expected to remain strong with more potential business opportunities.

Bank Indonesia believes that Indonesia has a strong economic outlook in 2025 with higher growth, lower inflation and stronger exchange rate. The outlook has further convinced the Indonesian central bank to release an estimated growth of around 11-13% in loans distributed in banking in 2025, to be driven by a growth in loans for investment, working capital, and consumption. A driver of growth will be larger investment and banking financing as investment climate improves. Such as strong market outlook for the upcoming 2025 is as source of optimism for BNI Treasury to strengthen quality and sustainable business growth with its stated strategies.

Treasury Segment Strategy in the Coming Year

Here are some the expansion strategies of Treasury to support achievements in the coming year 2025:

Financial Strategy

1. Manage rupiah and foreign exchange liquidity so that it is remains in an efficient and profitable position.
2. Optimize excess liquidity on instruments that provide the best return (yield) while still paying attention to daily liquidity conditions and financial market conditions.
3. Increase the securities portfolio and forex trading book with measurable risks, through both the Primary Market and Secondary Market.
4. Optimize the banking book securities and NOP positions management by taking into account liquidity needs, customer needs, existing ratios, as well as domestic and global financial market conditions.
5. Optimize the hedging product management to support increased hedging solution services to customers, increase FBI, and support financial market deepening.
6. Optimization of Wholesale and Retail segment treasury product transactions through BNI's digital platform for Forex and Bond products.
7. Optimization of USD/IDR carryover open positions with measurable risk management.
8. Optimization of yield enhancement products to increase FBI and with measurable risk management.
9. Optimization of BNI digital platform management to improve bond investment services and use of foreign exchange transactions to improve customer experience.
10. Optimization of the use of tools to support daily activities in transactions and customer portfolio management.

Non-Financial Strategy

1. Develop/migrate the Treasury Management System (TMS) to support a more optimal Treasury business
2. Increase synergy with related business units, including Corporate Banking, Institutional Banking, Syndication & Corporate Solution, International, and Regions/Branches to acquire top tier and diamond customers, including through regional sales.
3. Proactively providing education and offering hedging products to customers to help them choose the right hedging solution based on their business characteristics and risk appetite for FX and Bonds products (Bond forward and Bond Option)
4. Develop the competency and capability of Marketers/RM/Front liners in business units/Regional Offices/ Branches related to Treasury products as a one stop solution for customer needs, as well as increasing cross selling and market share of customer flow.
5. Become a treasury expert in providing knowledge enhancement literacy on treasury products to internal and external parties, including being a resource person and regulatory partner in the context of financial market deepening.
6. Increase customer engagement, especially potential customers, through customer loyalty programs, sharing sessions/customer gatherings/workshops related to Treasury products to increase the market share of Treasury transactions.
7. Determine an effective & efficient marketing program strategy through above/below the line marketing in line with customer criteria and aggressive marketing of digital Treasury products to increase the volume of forex, derivative and bond transactions from customer flow.



GUNTAR P.M SIAHAAN
Director of Finance and Risk Management, PT Sarinah

"We would like to thank the BNI Treasury team for their reliable and innovative services. The treasury cash management service has helped PT Sarinah optimize cash flow management, foreign exchange transactions, and operational efficiency. We hope this synergy continues to grow and provide even greater benefits in the future. Wishing BNI continued success!"



RAFAEL BUHAY CONCEPCION, JR.
Chief Financial Officer, PT SMART Tbk

The dedication and professionalism of BNI's Treasury team have played a crucial role in the effective management of our resources.

We are highly impressed with the innovative solutions and prompt support that consistently exceed our expectations.

BNI's Treasury has set the benchmark for excellence, and we are deeply grateful for the partnership that has been established. We look forward to continuing this successful collaboration and achieving even greater milestones together.



HENNY SANTOSA
Senior Finance Manager,
PT Best Industry Group

We would like to express our gratitude to BNI Treasury for being a reliable partner to our group, consistently providing excellent services and competitive pricing, supported by communicative, dependable, and capable personnel who offer effective solutions.

We hope this collaboration continues to thrive, grow, and achieve success together with our clients.

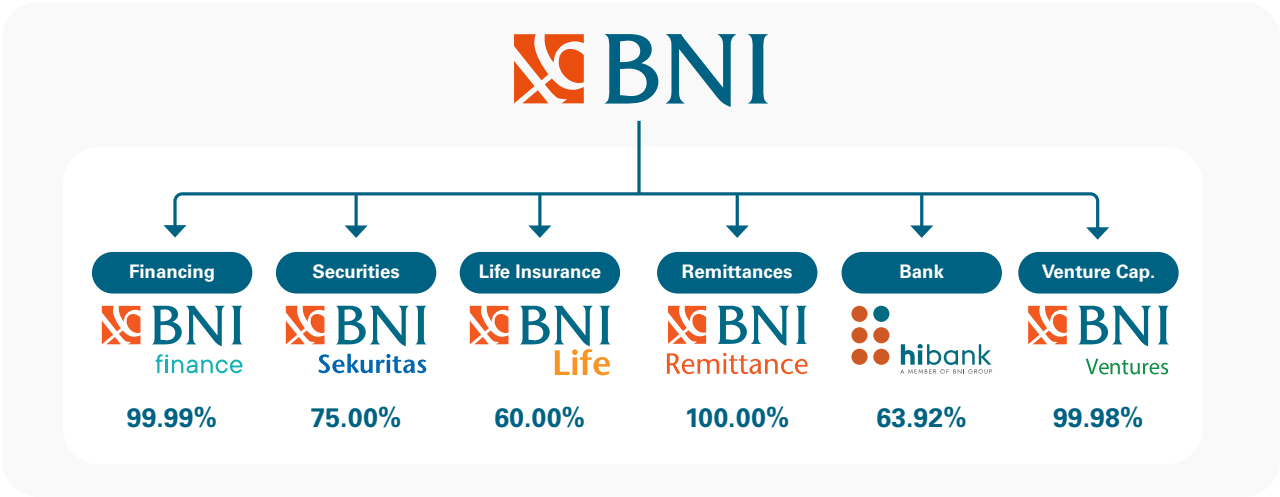
HEAD OFFICE

The Head Office segment manages BNI Wide's assets and liabilities, such as non-productive assets and share investment fees for subsidiaries. Management also covers receiving allocations of operational costs for services carried out centrally to other segments as well as income and expenses that are not allocated to other segments.

SUBSIDIARIES

In order to support BNI's vision of becoming a financial institution that excels in service and performance in a sustainable manner, BNI established subsidiaries in various industries in accordance with customer needs as a one stop financial solution by providing the best products and services.

Subsidiaries play a very important role in complementing the transactional needs of the community, as well as playing a role in improving BNI's overall performance. As of December 31, 2024, BNI had six subsidiaries, with majority ownership, namely, PT BNI Life Insurance (60.00%), PT BNI Sekuritas (75.00%), PT BNI Finance (99.99%), BNI Remittance Ltd (100.00%), PT Bank Hibank Indonesia (63.92%), and PT BNI Modal Ventura (99.98%).



Also, with minority share ownership, namely, PT Bank Syariah Indonesia Tbk 23.24%, PT Pemeringkat Efek Indonesia 0.14%, PT Kustodian Sentral Efek Indonesia 2.50%, PT Bank Mizuho Indonesia 1.0 %, PT Kliring Penjaminan Efek Indonesia 1.11%, and PT Bank SMBC Indonesia Tbk 0.11%.

In 2024, the contribution of Subsidiaries to BNI continued to increase, driven by rising profits across all subsidiaries supported by their flagship programs and synergistic collaboration with BNI as the parent company.

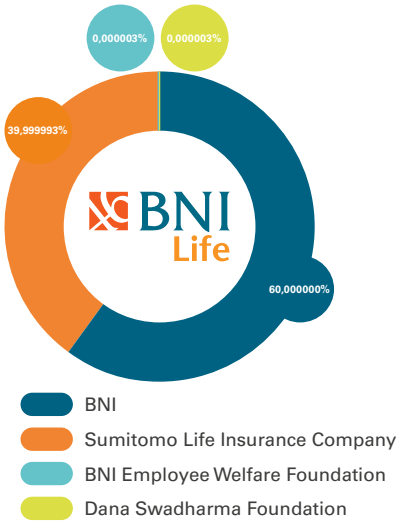
BNI Subsidiaries Profit Performancel

Subsidiary	2024*	2023	Increase (Decrease) 2023-2024		
	Total (IDR-billion)	Total (IDR-billion)	Nominal (IDR-billion)	Percentage (%)	
BNI Life	340	334	6	1.9	↑
BNI Sekuritas	86	71	15	21.2	↑
BNI Finance	1.7	(102)	104	101.7	↑
BNI Remittance	(2)	(3)	0.4	13.8	↑
hibank	132	130	2	1.7	↑
BNI Ventures	7	4	3	79.9	↑
Total	**565**	**434**	**131**	**30.2**	↑

*Unaudited

In 2024, BNI's Subsidiaries posted a net profit of IDR565 billion, marking a 30.2% year-on-year (YoY) growth compared to IDR434 billion in 2023 (audited). The performance of the Subsidiaries continues to improve as a result of business development efforts through transformations within several BNI subsidiaries. BNI Finance posted a profit of IDR1.7 billion, reflecting a 101.7% YoY growth from a loss of IDR102 billion in 2023. BNI Life recorded a profit of IDR340 billion, growing by 1.9% YoY compared to IDR334 billion in the previous year, in line with an increase in premium income and operational cost efficiency. BNI Sekuritas also posted a profit of IDR86 billion, representing a 21.2% YoY growth from IDR71 billion in the previous year, supported by a business strategy focused on retail and corporate segments. hibank reported a profit of IDR132 billion, growing by 1.7% YoY, driven by business growth through healthy and measured loan expansion.

BNI Life Share Ownership
(%)



PT BNI Life Insurance ("BNI Life")

BNI Life operates in the life insurance sector including Sharia life insurance. The insurance products offered by BNI Life include life, health, education, investment, pension and sharia insurance. The following shows is the ownership structure of BNI Life.

The highly dynamic global economic conditions, where societies live amidst uncertainty, compel companies across all industries to pursue continuous innovation and creative disruption. The insurance industry is no exception. According to data from the Indonesian Life Insurance Association (AAJI), life insurance industry premium income declined by 1.2% year-on-year in the third quarter of 2024.

Meanwhile, BNI Life recorded a 3.8% year-on-year decline in conventional premiums, which is still better compared to the overall decline in the national life insurance industry.

To maintain its performance, BNI Life is committed to innovation by creating superior products, which suit needs and to making continuous improvements, so that BNI Life can be the choice for the best insurance services and protection for the community.

The management's strategic policy in 2024 was:
1. Prioritize regular premium products and profitable products.
2. Improve business model and market development (non-captive expansion).
3. Optimize investment income and manage risk prudently.
4. Increase risk mitigation.
5. Efficiency and proper cost management.
6. Optimizing automation, digitalization, and Artificial Intelligence.
7. Strengthening the organization and quality of human resources.
8. Conduct parallel run of IFRS 17 implementation.
9. Sharia Spin Off Preparations.

Throughout 2024, PT BNI Life Insurance has continuously adapted to evolving conditions in pursuit of premium growth. In addition, the Bank continues to be committed to always providing the best service to customers. In line with this, BNI Life continues to improve digitization-based business processes and developments in operational areas by simplifying work systems in operational areas.

BNI Life Financial Performance

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Financial Position					
Assets	26,656	24,967	1,692	6.8	↑
Productive/Investment Assets	25,145	23,353	1,792	7.7	↑
Obligations	20,272	18,602	1,670	9.0	↑
Equity	6,384	6,361	23	0.4	↑
Profit & Loss					
Total Income	6,868	6,981	(113)	(1.6)	↓
Gross Premium Income	5,583	5,380	203	3.8	↑
Investment Income	1,256	1,573	(317)	(20.2)	↓
Non LINK	1,038	1,131	(94)	(8.3)	↓
LINK	218	442	(223)	(50.6)	↓
Other Income	128	127	1	0.8	↑
Total Expenses	(6,478)	(6,637)	159	(2.4)	↓
Insurance/Claim Fees	(5,013)	(5,194)	181	(3.5)	↓
Acquisition Fees	(607)	(634)	27	(4.2)	↓
Business Expenses	(732)	(690)	42	6.1	↑
Non Operational Expenses (Income)	(126)	(118)	7	6.0	↑
Profit before tax	390	344	46	13.3	↑
Tax	(50)	(11)	39	372.1	↑
Net Profit	**340**	**334**	**6**	**1.9**	↑

*Unaudited PSAK 71

In 2024, there was an increase in the growth of total assets and earning assets which grew by 6.8% YoY and 7.7% YoY respectively, illustrates the strong financial condition and the Company's ability to manage and increase asset value. The increase in liabilities reflects a financial strategy aimed at supporting business growth, showing the Company's involvement in managing finances well. The increase in equity reflects the Company's efforts to support growth through a balanced funding strategy. This provides a positive picture of the Company's ability to develop and compete in the market.

Total income decreased by 1.6% (YoY) reaching IDR6,868 billion in 2024. The decline was due to a decline in investment returns. Gross premium income increased by 3.8% (YoY), while investment income decreased by 20.2% (YoY) reaching IDR1,256 billion. Total expenses decreased by 2.4% (YoY), mainly due to lower insurance/claims expenses. Operating expenses increased but by a lower percentage. These increases or decreases in costs reflect an efficient cost management strategy. The company's financial performance during this period showed positive growth and efficient management so that in 2024 BNI Life's net profit reached IDR340 billion or growth of 1.9% (YoY).

BNI Life Financial Ratio Performance

Account	2024* (%)	2023 (%)	Difference (%)	
Return On Asset (ROA)	1.3	1.4	(0.1)	↓
Return On Equity (ROE)	5.3	5.2	0.1	↑
Investment Return/Assets Return	6.7	5.0	1.7	↑
Risk Based Capital (RBC)	796.7	680.6	116.1	↑

*unaudited PSAK 71

The strong financial performance for the 2024 fiscal year has positively impacted the achievement of BNI Life's financial ratios, which have also improved. The Return on Assets (ROA) decreased by 0.1%, from 1.4% in 2023 to 1.3% in 2024. The Return on Equity (ROE) reached 5.3%, an increase of 0.1% compared to the previous year, which was 5.2%. Although this increase is moderate, the improvement in ROE can be considered a positive outcome, as it reflects the company's ability to generate higher returns for its shareholders.

The investment yield ratio to investment assets increased by 1.7%, from 5.0% in December 2023 to 6.7% in 2024. The increase in investment returns indicates that the company's investment strategy has successfully generated better returns and contributed positively to overall financial performance. The Risk-Based Capital (RBC) rose by 116.1%, from 680.6% to 796.7%. This increase demonstrates that the company has a greater capital adequacy to bear risk. It provides confidence that the company possesses strong financial resilience and is capable of overcoming challenges over time.

In recognition of the performance achieved, BNI Life again received awards in 2024, including the following:

No	Award	Predicate	Category	Awarder	Description	Date
1	Indonesia Best CFO Award 2024	Best Performance Chief Financial officer in Strengthening partnership relation for revenue gain optimization	Life Insurance	Warta Ekonomi	This award was presented on January 31, 2024 by Warta Ekonomi Magazine to companies that consistently implement GCG in managing business activities that have a positive impact on the process of sustainable growth.	January 31, 2024

No	Award	Predicate	Category	Awarder	Description	Date
2	InvestorTrust Best Unit Link Award 2024	BNI Life Syariah Balanced Fund - Sharia Mixed Category 3 Year Period	Life Insurance	Investor Magazine	This award was presented on February 29, 2024, by Insurance Media Magazine. The award for BNI Life is based on the assessment of the unit-linked investment performance over the past two years, from December 2021 to December 2023. This award is expected to encourage insurance companies to provide the best protection and investment instruments.	February 28, 2024
3	InvestorTrust Best Unit Link Award 2024	BNI Life Syariah Balanced Fund - Sharia Mixed Category 5 Year Period	Life Insurance	Investor Magazine		
4	InvestorTrust Best Unit Link Award 2024	BNI Life Syariah Balanced Fund - Sharia Mixed Category 7 Year Period	Life Insurance	Investor Magazine		
5	InvestorTrust Best Unit Link Award 2024	BNI Life Syariah Fixed Income Fund - Sharia Fixed Income Category 3 Year Period	Life Insurance	Investor Magazine		
6	InvestorTrust Best Unit Link Award 2024	BNI Life Syariah Fixed Income Fund - Sharia Fixed Income Category 5 Year Period	Life Insurance	Investor Magazine		
7	InvestorTrust Best Unit Link Award 2024	BNI Life Syariah Fixed Income Fund - Sharia Fixed Income Category 7 Year Period	Life Insurance	Investor Magazine		
8	InvestorTrust Best Unit Link Award 2024	BLife Link Fixed Income SL Secure USD - Conventional USD Fixed Income Category 5 Year Period	Life Insurance	Investor Magazine		
9	Media Asuransi Best Unit Link Award 2024	Sharia Shares Unitlink Group on Products: BNI Life Syariah Equity Fund	Life Insurance	Media Asuransi	This award was presented on February 28, 2024, by Investor Magazine. The award for BNI Life is given as recognition for one of the best unit-linked products, which has proven to excel in performance and serves as an encouragement for life insurance companies to issue high-quality products that can provide optimal benefits to the public.	February 29, 2024
10	Media Asuransi Best Unit Link Award 2024	Rupiah Money Market Unitlink Group on Products: BLife Link Liquid Money Market	Life Insurance	Media Asuransi		
11	Media Asuransi Best Unit Link Award 2024	USD Fixed Income Unitlink Group on Products: BLife Link Fixed Income SL Secure USD	Life Insurance	Media Asuransi		

No	Award	Predicate	Category	Awarder	Description	Date
12	Indonesia Inspiring Woman Award 2024	Indonesia Inspiring Woman Award 2024	Special Award	The Iconomics	This award is presented on March 21, 2024 to women who inspire and demonstrate extraordinary strength to achieve their goals and dreams. They also show courage, perseverance and determination and teach the next generation of women that nothing is impossible if we have faith in ourselves and the determination to achieve it.	March 21, 2024
13	The Best "Corporate Secretary & Communication" 2024	The Best Indonesian Corporate Secretary & Communications	Life Insurance	Economic Review	This award was presented on March 28, 2024 to companies that are able to plan, implement, monitor and evaluate Corsec, Corcomm, PR strategies and programs and are able to prove their effectiveness in building the company's reputation. This is expected to increase customer and stakeholder trust in BNI Life.	March 28, 2024
14	13th Infobank-Isentia Digital Brand Recognition 2024	The 2nd Highest Digital Index Unit Link Insurance	Life Insurance	Infobank	This award was presented on April 1, 2024 at the 13th Infobank-Isentia Digital Brand Recognition 2024 as The 2nd Highest Digital Index Unit Link Insurance for the Unitlink product (BNI Life Dana Mantap 2) which is popular in cyberspace based on the 2024 digital brand research and is widely discussed by internet users (buzz) very positively and obtains a very good total index.	April 01, 2024
15	Indonesia Financial Top Leader Awards 2024	Improving Financial Navigation Adaptively and Innovatively In Disruption Era	Life Insurance	Warta Ekonomi	This award was presented on May 16, 2024 to the leaders of financial industry companies who consistently innovate, adapt and develop business in their company's activities. This award is expected to be more synergistic and perform better to build Indonesia.	May 16, 2024
16	Top Global Corporate Brand Award 2024	Indonesia TOP Digital PR Award 2024 Special Achievement for Financial Sector	Financial Sector	Info Ekonomi	This award was presented on May 30, 2024 for the achievements of PT BNI Life Insurance which has won the title of Indonesia TOP Digital PR Award 2024 Special Achievement for Financial Sector at the Top Global Corporate Brand Award 2024 event.	May 30, 2024

No	Award	Predicate	Category	Awarder	Description	Date
17	50 Most Outstanding Women 2024	The Most Outstanding Women 2024 in Financial sector & state owned enterprise	Financial Sector	Infobank	This award was presented on June 1, 2024 to female leaders who have different perspectives that can generate new ideas and concepts and provide motivation to other women so that they can continue to encourage Gender Diversity in the organization.	June 1, 2024
18	Sharia & Halal Top Brand	Indonesia Best Sharia Business Unit of Life Insurance 2024 with Market Potential Optimization to Achieve Target Premium for Sharia Insurance	Sharia Business Unit of Life Insurance	Warta Ekonomi	This award was presented on July 2, 2024 to companies with the best reputation and financial performance as well as innovative sharia products and/or services.	July 2, 2024
19	Indonesia Re International Conference 2024	The Most Innovative Product Development	Life Insurance	Indonesia RE	This award was presented by Indonesia RE on July 25, 2024 to BNI Life as The Most Innovative Product Development. This award is a form of appreciation, hard work, commitment, motivation to continue to innovate.	July 25, 2024
20	25th Insurance Award	The Fastest Gross Premium Growth Life Insurance Company Special Award Trophy	Life Insurance	Infobank	This award was presented by Infobank Magazine on July 26, 2024 to BNI Life at the 2024 Insurance Award event.	July 26, 2024
21	25th Insurance Award	The Excellent Performance Life Insurance Company 2024 (Gross Premium > IDR 5 Trillion)	Life Insurance	Infobank		
22	Insurance Market Leaders Award 2024	Life Insurance Market Leaders 2024	Life Insurance	Media Asuransi	This award was presented by Media Asuransi Magazine on July 30, 2024 to BNI Life at the 2024 Insurance Award event. This award is given to companies based on the best premium and performance achievements in 2023. Market Leaders in any industry have an important role and great influence, besides this can encourage companies to continue to innovate.	July 30, 2024
23	Insurance Market Leaders Award 2024	Sharia Life Insurance Market Leaders 2024	Life Insurance	Media Asuransi		

No	Award	Predicate	Category	Awarder	Description	Date
24	5th Indonesia Top Insurance Awards 2024	Life Insurance 2023 with Assets of IDR10-25 trillion	Life Insurance	The Iconomics	This award was given by The Iconomics Magazine on September 10, 2024 to BNI Life through an assessment of two parameters, namely the Rank Financial Indicator (with a weighting of 60%) and the Rank Financial Growth Indicator (with a weighting of 40%). The assessment based on the Rank Financial Indicator is an assessment given based on financial performance figures in a list of insurance company groups. The Rank Financial Growth Indicator is an assessment given to insurance companies for the achievement or progress of financial performance from the previous year.	September 10, 2024
25	TOP GRC Awards 2024	Top GRC Award 2024 5 Stars	Life Insurance	Top Business	This award was presented by Top Business Magazine on September 11, 2024 to BNI Life. The company that received the TOP GRC Awards was a company that was considered to have complete GRC Systems and Infrastructure and was successful in implementing GCG, Risk Management, and Compliance Management (GRC) to support sustainable business growth.	September 11, 2024
26	TOP GRC Awards 2024	The Most Committed GRC Leaders 2024	Life Insurance	Top Business		
27	Best Sharia Award Infobank 2024	The Best Sharia Life Insurance 2024(Excellent Financial Performance 2023)	Life Insurance	Infobank	This award was presented by Infobank on October 3, 2024 to BNI Life	October 3, 2024
28	Best Sharia Award Infobank 2024	The Best State Owned Enterprise Subsidiary 2024 (Excellent Financial Performance 2023)	Life Insurance	Infobank		
29	TOP 20 Financial Institution & The Finance Awards 2024	The Best Performing Life Insurance 2024 Based on financial Performing 2021-2023	Life Insurance	Infobank	This award was presented by Infobank on October 22, 2024 to BNI Life. This award is a performance assessment carried out by a company that has succeeded in maintaining its performance for 3 financial periods that remain stable and grow positively amidst challenging conditions for the company's finances throughout 2023.	October 22, 2024

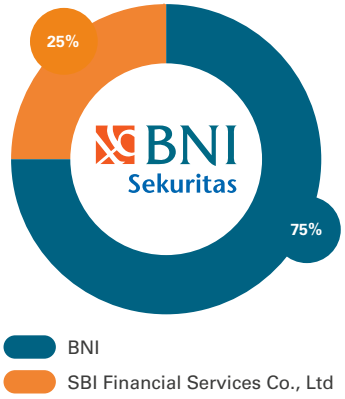
No	Award	Predicate	Category	Awarder	Description	Date
30	Stellar Workplace Award 2024	Top 5 Stellar Workplace Award for Medium Size Employer	Life Insurance	Kontan	This award was presented by Kontan on October 31, 2024 to BNI Life. This award is given to companies that have made efforts to increase the level of employee commitment in assessing behavior in the form of positive contributions that influence the company's success in creating the best workplace so that they can have employees with high emotional attachment (engagement) to the company where they work.	October 31, 2024
31	Stellar Workplace Award 2024	Stellar Workplace Recognition in Employee Commitment	Life Insurance	Kontan		
32	Stellar Workplace Award 2024	Stellar Workplace Recognition in Employee Satisfaction	Life Insurance	Kontan		
33	Digital Financial Excellence Award 2024	Group Life Insurance Category above IDR1.5 Trillion.	Life Insurance	Media Asuransi	This award was given by Media Asuransi on December 5, 2024 to BNI Life. This award is given as an appreciation to companies in the industry that have succeeded in carrying out digital transformation and making significant contributions in supporting economic growth through digital innovation and is expected to be a motivation for the financial industry to continue to adapt and innovate, presenting inclusive and sustainable digital financial solutions and services.	December 5, 2024

PT BNI Sekuritas ("BNI Sekuritas")

BNI Sekuritas is a subsidiary of BNI engaged in securities trading, which includes acting as a securities broker, securities underwriter, and other activities related to these operations, while adhering to applicable laws and regulations.

BNI Sekuritas Share Ownership Structure

(%)



BNI Sekuritas considers 2024 to be a year centered around one core pillar: resilience. With uncertainty, particularly surrounding Indonesia's upcoming general election, remaining a significant challenge, the company is focusing on strategies that enhance its adaptability to shifting dynamics. By closely tracking economic and political developments, BNI Sekuritas is dedicated to proactively identifying new opportunities and delivering optimal solutions for its clients and customers.

BNI Sekuritas Financial Performance

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Balance Sheet					
Assets	1,983	2,377	(394)	(16.6)	↓
Obligations	681	1,206	(525)	(43.5)	↓
Equity	1,302	1,172	130	11.1	↑
Profit/Loss					
Income	699	586	113	19.3	↑
Brokerage commissions	200	119	81	68.1	↑
Investment management fees	98	115	(17)	(14.8)	↓
Brokerage comm. from fix income activities	29	46	(17)	(37.0)	↓
Fees from investment banking activities	299	257	42	16.3	↑
Increase/(decrease) on net asset value of mutual funds	3	1	2	200.0	↑
Interest revenue from fund separation & bond & dividen	26	15	11	73.3	↑
Gain (Loss) on trading of marketable securities - net	10	9	1	11.1	↑
Margin and overdue revenue	22	14	8	57.1	↑
Others	12	9	3	33.3	↑
Business Expenses	(594)	(498)	(96)	19.3	↑
Other income	31	25	6	24.0	↑
Interest & Other Finance Fees	(35)	(23)	(12)	52.2	↑
Total Income	**730**	**610**	**120**	**19.7**	↑
Total Expenses	(629)	(521)	(108)	20.7	↑

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Profit Before Tax	101	89	12	13.5	↓
Tax	(15)	(19)	4	(21.1)	↑
Profit After Tax	86	70	16	22.9	↑

*Unaudited

BNI Sekuritas' total assets in 2024 reached Rp1,983 billion, reflecting a 17% decrease compared to Rp2,377 billion in 2023. This decline was primarily due to a reduction in customer transaction receivables related to the company's securities trading activities.

The Company's liabilities as of December 31, 2024, experienced a notable decrease, largely driven by a reduction in customer transaction payables, which corresponded with the decline in customer transaction receivables. The change in BNI Sekuritas' equity as of December 31, 2024, was primarily attributable to the company's retained earnings balance.

BNI Sekuritas Financial Ratio Performance

Account	2024* (%)	2023 (%)	Selisih (%)	
Return On Asset (ROA)	4.3	3.0	1.3	↑
Return On Equity (ROE)	6.6	6.0	0.6	↑
Operating Expenses to Operating Income (BOPO)	85.1	85.1	0.0	-

*Unaudited

The growth in ROA and ROE was primarily driven by a substantial increase in the company's consolidated profit for FY 2024, rising from IDR70 billion in December 2023 to IDR86 billion in December 2024. This increase was largely attributed to higher brokerage commissions from equity-related commission income and a rise in investment banking income compared to 2023.

BNI Sekuritas continued to receive various awards throughout 2024, as an appreciation for the performance that grew from year to year, including the following.

Alpha Southeast Asia 17th Annual Best Deal & Solution Awards 2023 (Best IPO Deal of the Year in Asia PT Barito Renewables Energy Tbk's IDR3.1 Trillion IPO)
2. Alpha Southeast Asia 17th Annual Best Deal & Solution Awards 2023 (Best Deal of The Year & Best Equity Deal of The Year In Asia PT Amman Mineral Internasional Tbk's IDR10.73 Trillion (US$720 million) IPO)
3. Alpha Southeast Asia 17th Annual Best Deal & Solution Awards 2024 (Best Local Currency Bond Deal of the Year in Indonesia PT Bank Mandiri (Persero) Tbk's IDR5 Trillion (US$333.56 million) Green Bonds)
4. Alpha Southeast Asia 17th Annual Best Deal & Solution Awards 2023 (Best ESG Green Financing in Indonesia PT OKI Pulp & Paper Mills's IDR1.5 Trillion Green Bond)
5. The Asset Triple A Sustainable Finance 2024 (Best Green Bond - Financial Institution)
6. The Asset Triple A Sustainable Finance 2024 (Renewable Energy Deal of the Year)
7. Asian Banking & Finance Awards 2024 (Mergers and Acquisitions Deal of the Year)
8. Asian Banking & Finance Awards 2024 (Indonesia dan Equity Deal of The Year - Indonesia)
9. Euromoney (Best for large cap in Indonesia: BNI Sekuritas)
10. Euromoney (Best for research in Indonesia: BNI Sekuritas)
11. Corporate Governance Performance Index (CGPI) 2024 (Trusted Company)

PT BNI Multifinance ("BNI Finance")

In accordance with Article 3 of the Articles of Association, the scope of activities of BNI Finance carries out activities in the fields of investment financing, working capital financing, multipurpose financing and operating leases. BNI Finance's current focus is on multipurpose financing or the consumer segment, with its superior product being financing for regular (new) four-wheeled vehicles as well as through the fleet Car Ownership Program (COP).

Additionally, BNI Finance offers Fleet and Captive products, which include financing for passenger and non-passenger vehicles (such as buses, trucks, and operational vehicles) as well as heavy equipment, with a customer base primarily from the BNI Group.

BNI Finance Share Ownership Structure

(%)



The business strategy carried out by BNI Finance in 2024 is a development of the previous year's strategy that supports the BNI Finance transformation process.

The business strategy is divided into 5 aspects, namely:

1. Business Innovation
   Increased consumer business growth through expansion of marketing/distribution network, improving relationships with dealers and ATPM, synergy with parent in the form of Joint Financing, opening BNI savings for BNI Finance customers and Autodebit.
2. Internal Business Process
   Strengthening internal control and strengthening management collection.
3. Financial
   Strengthening Funding through additional loan facilities from parent and other financial institutions.
4. Digitalization
   Implementation of QR BPKB, WA blast welcome letter, funding and treasury system, installment payment via wondr by BNI, new operating lease data migration and website update.
5. Human Capital & Organization:
   Fulfillment of employee needs, improvement of employee competencies and implementation of human resource information system.

BNI Finance Financial Performance

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Balance Sheet					
Assets	6,076	3,789	2,287	60.4	↑
Cash and Bank	99	62	37	59.7	↑
Deposits	50	436	(386)	(88.5)	↓
Financing	5,686	3,024	2,662	88.0	↑
CKPN Financing	(184)	(90)	(94)	104.4	↑
Leasing	1,164	516	648	125.6	↑
Consumer Payments	4,501	2,464	2,037	82.7	↑
Factoring	20	44	(24)	(54.5)	↓
Liabilities	5,229	2,938	2,291	78.0	↑
Equity	847	851	(4)	(0.5)	↓
Profit/Loss					
Leasing Income	86	50	36	72.0	↑
Consumer Financing Income	465	95	370	389.5	↑
Factoring Income	3	6	(3)	(50.0)	↓
Interest Income	554	151	403	266.9	↑
Interest Expense	(282)	(96)	(186)	193.8	↑
Net interest income	272	54	217	394.5	↑
Operating Lease Income	64	72	(8)	(11.1)	↓

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Fee Based Income	37	33	4	12.1	↑
Recovery Income	6	12	(6)	(50.0)	↓
Other Operating Income	66	27	39	144.4	↑
Total Operating Income	445	199	246	123.6	↑
Total Operating Expenses	(306)	(220)	(86)	39.1	↑
PPOP	139	(21)	160	761.9	↑
Provisions	(194)	(90)	(104)	115.6	↑
Tax	11	5	6	120.0	↑
Net Profit/(Loss) After Tax	1.7	(102)	104	101.7	↑

*Unaudited

As of December 2024, total assets reached IDR 6.07 trillion, marking a 60.4% increase compared to IDR3.8 trillion in December 2023. This growth was driven by an 82.7% increase in consumer segment financing, which resulted from successful business innovations implemented through targeted marketing strategies, expanding distribution networks in key areas, and strengthening relationships with dealers and authorized vehicle distributors (ATPM).

Due to significant growth on the asset side, interest income grew positively by IDR403 billion so that operating income grew 123.6%. On the other side, operational expenses increased by 39% in line with the transformation carried out including adding branches, IT investment to increase Information Technology capacity and capability, and recruitment of reliable HC in line with the demands of consumer finance business processes.

BNI Finance Financial Ratio Performance

Account	2024* (%)	2023 (%)	Difference (%)	
Non Performing Financing (NPF) (%)	3.2	1.8	1.4	↑
Return on Asset (ROA) (%)	(0.8)	(5.4)	4.6	↑
Return on Equity (ROE) (%)	0.2	(31.6)	31.8	↑
Operating Expenses to Operating Income (BOPO) (%)	107.5	137.7	(30.2)	↓
Debt Equity Ratio (DER) (kali)	6	3.2	2.8	↑

*Unaudited

The Company's Debt Equity Ratio (DER) stood at 6 times and is still below the regulatory threshold of a maximum of 10 times. Gross Non-Performing Loan (Gross NPL) has increased from 1.8% in December 2023 to 3.2% as of December 2024. BNI Finance management will strengthen internal control and collection management functions and always be "prudent" in providing new financing so that Gross NPLs improve and are controlled.

In 2024, the company began to report positive profit after tax, with profitability ratios, including Return on Assets (ROA) and Return on Equity (ROE), showing improvement compared to the previous year. Additionally, the efficiency ratio, specifically the company's BOPO, improved by 30.2%, decreasing from 137.7% to 107.5%. This reflects the company's enhanced efficiency in managing its operating expenses.

BNI finance won several awards throughout 2024 including:
1. The 3rd Best Multifinance Company Asset 1 T - < 5 T: Infobank – April 1, 2024
2. Indonesia Best Multifinance 2024 for Strengthening Transformation and Financing Expansion (Category: Total Asset 1-5 trillion): Warta Ekonomi – September 26, 2024
3. ISO 27001:2022 Certification: National Accreditation Committee – October 14, 2024
4. Best BUMN Award 2024 for Implementing Efficiency Effectivity to Strengthen Business Performance: Warta Ekonomi – October 31, 2024

BNI Remittance Limited ("BNI Remittance")

BNI Remittance Ltd. ("BNI Remittance") is a BNI Subsidiary engaged in the remittance sector and is wholly owned by BNI. BNI Remittance collaborates with BNI in the financial inclusion program that provides financial access to meet the needs of Indonesian Migrant Workers (PMI) in Hong Kong. Apart from the remittance business, the presence of BNI Remittance in Hong Kong plays a strategic role as a representative of BNI retail services in Hong Kong where BNI customers in Hong Kong can use BNI services as easily as services in their homeland.

Synergy with BNI continues by providing various BNI digital services that can also be accessed easily in Hong Kong, the first is the BNI Mobile Banking service, currently a customer favorite in Hong Kong, for carrying out financial transactions, then BNI Taplus account opening digitally either through wondr by BNI or through eForm. BNI Remittance is also actively involved in several activities with PMI such as capacity building, financial literacy, visits to PMI communities in Hong Kong, and so on.

In 2024, BNI Remittance together with BNI KLN Hong Kong conducting a study to carry out business transformation to increase market share and as a responsive step to changes in customer transaction patterns that are currently starting to switch to digital channels.

BNI Remittance Financial Performance

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Balance Sheet					
Assets	9	11	(3)	(24)	↓
Current Assets	6	8	(2)	(26)	↓
Fixed Assets	0.2	(15)	15	99	↑
Other Assets	3	19	(16)	(85)	↓
Liabilities	2	3	(1)	(19)	↓
Current Liabilities	2	3	(1)	(19)	↓
Equity	6	8	(2)	(26)	↓
Profit/Loss					
Income					
Commission Earned	3	3	0.1	4	↑
Exchange gain/Loss	0.8	0.7	0.1	10	↑
Other Commission	5	5	0.8	16	↑
Total Income	9	9	1	11	↑
Operational Expenses	(12)	(11)	(0.5)	4	↑
Earning Before Tax	(2)	(3)	0.5	15	↑
Tax**		-			
Earning After Tax	(2)	(3)	0.5	15	↑

*) Unaudited
**) There is no tax liability for BNI Remittance due to negative accumulated retained earnings in the equity component

In 2024, BNI Remittance reported a negative profit, primarily due to an 4% increase in operating expenses (OPEX). This was largely attributed to the relocation of the office in Causeway Bay, where delays in obtaining regulatory approval for the new office resulted in higher office rental costs. Additionally, BNI Remittance's revenue showed no year-on-year growth, as customer transaction behaviors shifted towards digital channels. The rise of new competitors, particularly from non-banking sectors, offering more convenient services and lower transaction costs for money transfers, further impacted revenue.

BNI Remittance Financial Ratio Performance

Account	2024* (%)	2023 (%)	Difference (%)	
Return On Asset (ROA) (%)	(26)	(17)	(7)	↓
Return On Equity (ROE) (%)	(33)	(23)	(10)	↓
Operating Income (BOPO) (%)	126	128	(2)	↓

*Unaudited

BNI Remittance's ROA and ROE in 2024 were recorded at minus 26% and minus 33%, decreasing compared to 2023, this is in line with the decrease in BNI Remittance's net profit.

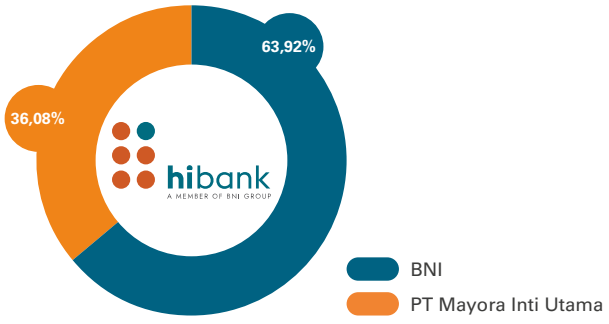
PT Bank Hibank Indonesia ("hibank")

PT Bank Hibank Indonesia ("hibank") officially became a Subsidiary of BNI following BNI's takeover of a majority shares conducted by BNI toward Bank Mayora on May 18, 2022. PT Bank Mayora has officially changed its name to hibank after receiving approval from the OJK on May 17, 2023. hibank will be transformed into a Digital Bank with the vision to become the "Leading Digital-First MSME Bank in Indonesia". hibank's transformation process continues by building a stronger foundation for growth in different aspects, including loans, services, information technology, human capital, risk management and infrastructure.

The financial performance aspects development has continued since hibank joined the BNI Group. Improvement initiatives have been carried out by prioritizing BNI Group's synergy with hibank to be able to provide added value and cost efficiency as a group. hibank has played an active role in supporting the MSME segment through a variety of savings and loan products.

hibank Share Ownership Structure

(%)



hibank continues to undergo digital transformation to achieve its best performance in supporting the bank's operations and providing the best services to its customers. In 2024, hibank is developing a key strategy by implementing several initiatives as follows:

1. Lending to support the Bank's business growth is done selectively, with a focus on lending growth to MSMEs. The Bank also entered into several partnerships with Anchor for Supply Chain Ecosystem Financing. Total loan disbursement is targeted at IDR9.03 trillion, or grew by 50% (YoY). The Bank also plans to distribute Pay-Later loans starting January 2024. In accordance with the Bank's commitment to empowering the MSME segment, the composition of lending to MSMEs is increased from 40.00% in 2023 to 45.00% of total lending in 2024;
2. The growth of lending to be achieved by the Bank will continue to pay attention to prudential aspects, and mitigate risks that may arise, so that healthy and productive asset quality can be maintained. The Bank targets the ratio of non-performing loans or gross NPLs to be in the range of 2.25%;
3. Third Party Funds (DPK) growth in total will increase by 30% in 2024 which will be supported by improvements in the composition of low-cost funds, with an increase in the CASA ratio from 32.9% in 2023 to 37.0% in 2024. The Bank will increase customer transactions both Individual and Corporate through Digital banking (Internet banking/mobile banking retail, Internet banking business) in providing banking service solutions to customers;
4. Operating income other than interest is projected to grow by 137% YoY by the end of 2024. The Bank will increase fee-based income from loan-related income, Bancassurance products, Forex income as well as Digital Banking-related income;
5. The Bank will continue to review the performance of its current branch offices and regularly review the productivity, profitability and customer acquisition and transaction levels of all offices as well as the business potential in the area. From the results of this review, the Bank plans to close 7 (seven) Sub-Branch Offices (KCP) in 2024, respectively 2 KCP in Tangerang, 4 KCP in West Java and 1 KCP in Surabaya;

6. The Bank will launch new products and activities in 2024 where the development of flagship products is ensured to be competitive and value-added and in line with current customer needs. Various initiatives have been undertaken to accelerate the transformation process of each new product and activity so as to assist business growth during 2024 and beyond;
7. The Bank's target market will be approached through community ecosystems such as industry communities, associations, and demographics. The Bank will implement a customer acquisition strategy through various channels including its branch network, value chain and digital channels;
8. The bank will be the orchestrator by connecting the dots between MSMEs where hibank creates the MSME market, and grows the market through education and financing through the Hi! Platform. The single Hi! Platform can fulfill the needs of individuals, micro, and SMEs in transactions, loan applications, several value-added services, and most importantly will provide connectivity for incorporated MSMEs;
9. The Bank will optimize the potential synergies and collaborations with BNI Group and Mayora Group, to increase the Bank's competitiveness in the market and help boost its performance. Some of the potential synergies and collaborations that will be carried out include the utilization of BNI ATMs and Agent 46 as hibank channels, API integration with BNI for bill payment banking services (API sharing biller), BNI as a QRIS acquiring aggregator for hibank merchants at competitive rates, and supplier financing credit distribution in collaboration with Mayora Group.

hibank Financial Performance

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Financial Position					
Assets	17,799	14,599	3,200	21.9	↑
Placements at BI	1,948	1,900	48	2.5	↑
Placements with Other Banks	1,338	655	683	104.3	↑
Securities	2,773	5,569	(2,796)	(50.2)	↓
Loans	10,561	6,018	4,543	75.5	↑
CKPN	(174)	(139)	(35)	25.2	↑
Liabilities	13,202	10,128	3,074	30.3	↑
Third-party funds	12,643	9,500	3,143	33.1	↑
Current Accounts	4,426	2,566	1,860	72.5	↑
Savings	840	979	(139)	(14.2)	↓
Deposits	7,377	5,955	1,422	23.9	↑
Equity	4,597	4,470	127	2.8	↑
Profit/Loss					
Operating Income	701	547	154	28.2	↑
Net interest income	632	524	108	20.6	↑
Interest income	1,144	846	298	35.2	↑
Interest expense	(512)	(321)	(190)	59.5	↑
Other Operating Income	69	23	46	200.0	↑
Operating Expenses	(496)	(352)	(144)	40.9	↑
Pre-Provision Operating Profit	205	195	10	5.1	↑
Provision	(36)	(32)	(4)	12.5	↑
Operating Profit (Loss)	169	163	6	3.7	↑
Non-Operating Profit (Loss)	1	4	(3)	(80.0)	↓
Profit (Loss) After Tax	132	130	2	1.5	↑

*Unaudited

hibank Financial Ratio Performance

Account	2024* (%)	2023 (%)	Difference (%)	
Return On Asset (ROA)	1.1	1.3	(0.2)	↓
Return On Equity (ROE)	3.1	2.9	0.2	↑
Operating Expenses to Operating Income (BOPO)	86.1	81.2	4.9	↑
Current Account Saving Account (CASA)	41.7	37.3	4.4	↑
Net Interest Margin (NIM)	4.3	4.5	(0.2)	↓
Loan to Deposit Ratio (LDR)	83.5	63.3	20.2	↑
Cost of Fund (COF)	4.5	3.8	0.7	↑
Capital Adequacy Ratio (CAR)	47.2	86.2	(39.0)	↓

*unaudited

In 2024, hibank demonstrated excellent performance, as seen in the Operational Income (Gross), which increased by 28.2% (YoY), indicating that the bank has successfully raised the level of loans granted. The CASA ratio improved to 41.7% in December 2024, from 37.3% in December 2023, reflecting that Hibank has implemented the right strategy in funding management.

Non-interest income grew significantly by 200.0% (YoY), reflecting the bank's success in various treasury transactions, fees from bancassurance and wealth management product sales, as well as increased banking transactions.

Operating expenses rose by 40.9% (YoY) due to efforts to increase awareness and support hibank's digital service transformation in corporate rebranding and comprehensive digital transformation activities.

The ROE and ROA ratios in December 2024 were recorded at 3.1% and 1.1%, respectively. These ratios decreased compared to the same period the previous year, in line with the decline in the bank's net profit.

However, hibank posted other positive performance achievements, as seen in credit distribution, which surged by 75.5% (YoY). This achievement indicates the bank's success in building an ecosystem through a channeling model to companies with strong ecosystems.

In line with the bank's new vision and mission, hibank consistently plays an active role in supporting the growth of the Micro, Small, and Medium Enterprises (MSME) sector. This support is also reflected in the percentage of credit given to the MSME sector, which reached 34.4% in December 2024, exceeding the minimum requirement set by the Regulator at 20%.

The Bank's Credit Quality Ratio (gross NPL) decreased to 0.8% in December 2024, improving from the previous period's gross NPL of 1.2%. This achievement reflects the bank's commitment to assisting customers in facing challenges and restructuring credit to maintain asset quality.

On the other hand, the Bank's Liquidity Ratio (LDR) in December 2024 was well-maintained at 83.5%, up from 63.3% in December 2023.

The Bank's funding profile remained well-managed, reflected in the positive growth of the Current Account and Time Deposit portfolios, which increased by 72.5% (YoY) and 23.9% (YoY), respectively, while savings slightly decreased by 14.2%. Maintaining liquidity remains a key focus for the bank's management given external (domestic and global) factors. Strict monitoring continues to ensure the bank's liquidity remains within safe levels.

The Bank's Capital Adequacy Ratio (CAR) was strong at 47.2% in December 2024, demonstrating hibank's stability and sustainability in supporting economic growth. This achievement also reflects hibank's dedication and solid strategy in navigating challenges and optimizing opportunities in the face of modern banking dynamics.

Additionally, hibank received several awards in 2024 as a recognition of its performance, including the following:

Awards Received by Bank Mayora in 2024

No.	Award Name	Date	Event Name	Organizer
1.	Top Digital Innovation in Product Offering and Experience Innovation	February 20, 2024	Indonesia 20 Top Digital Innovation Award 2024	The Iconomics
2.	The 3rd Best Bank Digital 2024 KBMI 1	April 01, 2024	13th Infobank Digital Brand Recognition 2024	Infobank
3.	The Best Indonesia Sales Marketing VII 2024 Gold Award	May 29, 2024	7th Indonesia Sales & Marketing Award 2024	Economic Review
4.	Indonesia Best Bank 2024 for Innovation and Transformation to Increase MSMEs Financial Inclusion	July 31, 2024	Indonesia Best Bank Award 2024	Warta Ekonomi
5.	The Best Indonesia Finance Award VII 2024 Gold Award	August 12, 2024	Indonesia Finance Award VII 2024 & Indonesia Leader Award III 2024	Economic Review
6.	Top GRC Award 2024 4 Star	September 11, 2024	Top GRC Award 2024	Top Business
7.	The Best State Owned Enterprise Subsidiary 2024	October 03 2024	The Asian Post Best State Owned Enterprise 2024	Infobank
8.	The Best Indonesia Annual Report Award 2024 Gold Award	October 11 2024	Indonesia Annual Report Award III 2024	Economic Review
9.	The Best Finance Award 2024 kategori Bank Beraset 10 T - <25T	October 22, 2024	The Finance Executive Forum & Top 20 Financial Institution 2024	Infobank

PT BNI Modal Ventura ("BNI Ventures")

BNI Ventures is a manifestation of BNI Group's commitment to addressing the challenges of exploring the continuously evolving digital economy ecosystem. With a focus on strategic investments, BNI Ventures emphasizes collaboration and synergy with the BNI Group ecosystem. This approach not only accelerates the growth of early-stage startups and potential digital businesses but also strengthens the integration of technology-based financial services, ensuring the sustainability of innovation and creating added value for BNI Group. Through this initiative, BNI Ventures is committed to becoming a relevant and impactful catalyst for digital transformation.

BNI Ventures takes the lead in expanding the reach of digital banking as part of BNI Group's broader vision to adapt and excel in the digital transformation era. As a key catalyst, BNI Ventures partners with strategic collaborators such as fintechs, startups, and technology providers to build a more inclusive and innovative financial ecosystem. Through this approach, BNI Ventures strengthens BNI Group's digital infrastructure through synergy and strategic investments, ensuring sustainable development, creating value, and promoting financial inclusion in Indonesia.

BNI Ventures envisions itself as a leading corporate venture capital firm in Southeast Asia, with a focus on creating synergistic value and achieving superior investment performance while growing sustainably. To achieve this vision, the company engages in various operational activities in the form of equity participation, the purchase of convertible bonds (quasi-equity participation), funding through the purchase of debt securities issued by startups or businesses in the development stage, as well as venture debt financing for productive enterprises. BNI Ventures also aims to manage venture funds that not only provide financial returns through high investment yield potential but also offer strategic benefits such as access to innovation, the expansion of the business ecosystem, and strengthening the competitiveness of BNI Group in the digital economy sector.

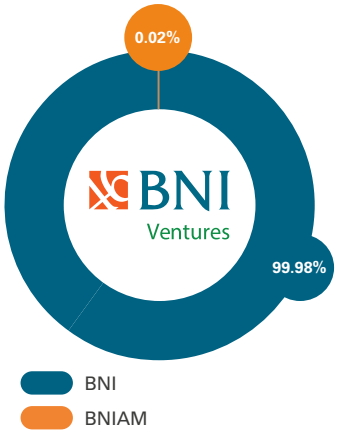
Gradually BNI Ventures has developed 5 (five) main strategic steps in the work plan, namely:

1. Governance, Legal & Compliance
   Overseeing the company's business and operational activities from a legal and compliance perspective by accommodating the company's needs without neglecting the protection of the company's interests and compliance with applicable regulations.

2. Investment & Risk Management
   Proactively, identify investment opportunities and invest in startups that have the potential to provide financial benefits with controlled risks, while making a positive contribution to business development in the BNI Group ecosystem, while adhering to the principle of prudence. This investment strategy is also focused on strengthening business synergies and supporting sustainable digital ecosystem growth.
3. Synergy & Innovation
   Actively participating in ecosystem activation and innovation activities in the industry and acting as a liaison between business solutions offered by startups to business units within the BNI Group.
4. Finance & Operations
   Optimize planning and management of financial resources to achieve targets and objectives, support the execution of strategic plans, and become a bridge for stakeholders.
5. People & Culture
   Encourage increased capability and employee performance and build a positive, creative, agile and collaborative work culture to support sustainable company growth and synergy, while strengthening employee involvement, capability and sense of ownership.

BNI Ventures Share Ownership

(%)



BNI Ventures Financial Performance

Account	2024* (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Balance Sheet					
Assets	524	511	12	2.4	↑
Current Assets	458	463	(5)	(1)	↓
Venture Capital Investment Assets	62	46	16	35.9	↑
Fixed Assets	2	2	(0.1)	(3.9)	↓
Other Assets	0.8	0.9	(0.1)	(10.9)	↓
Liabilities	9	4	5	146.4	↑
Equity	515	508	7	1,4	↑
Profit/Loss					
Operating Income	8	0,6	7	1,069.0	↑
Other Operational Income	25	18	7	38.5	↑
Total Income	32	18	14	74.7	↑
Operational Expenses	(24)	(14)	(10)	71.9	↑
Profit Before Tax	8	4	4	85.8	↑
Deferred Tax	(0.5)	(0.1)	(0.4)	253.4	↑
Tax	-	-	-	-	-
Profit After Tax	7	4	3	79.9	↑

*) unaudited

BNI Ventures Financial Ratio Performance

Account	2024* (%)	2023 (%)	Selisih (%)	
Return On Asset (ROA)	1.4	0.8	0.6	↑
Return On Equity (ROE)	1.4	0.8	0.6	↑

*Unaudited

In 2024, BNI Ventures will continue to demonstrate its commitment to realizing sustainable growth through investment activities, in accordance with its founding mandate. This is proven by the implementation of an investment activity, through participation in a start-up company operating in the fintech ecosystem in February 2024. In addition, BNI Ventures has fulfilled its first Red White Fund capital call in August 2024. On the other hand, the increase in liabilities was mainly influenced by reserves for human resource costs which will be paid at the beginning of the following year, as well as the formation of reserves for professional services expenses to support the increase Company business activities. The Company's equity position also increased along with the accumulated retained earnings for the year.

As part of the BNI Group, BNI Ventures managed to record solid financial performance in 2024. Total revenue was recorded at IDR32 billion, a significant increase of 74.7% compared to the previous year. This increase was driven by the recording of investment asset revaluation, interest income from convertible notes investments, and returns from fund placements.

Meanwhile, operating costs were recorded at Rp24 billion, up 71.9% from the previous year. This increase was mostly allocated to support business development, including the implementation of synergy and innovation activities, as well as recruitment of human resources to meet the company's strategic needs.

The net profit after tax successfully recorded in 2024 was IDR7,2 billion or a significant increase of 79.9% compared to 2023. This achievement not only reflects BNI Ventures' success in improving business performance, but also emphasizes its position as a company with consistent growth potential. Solid financial performance reflects BNI Ventures' bright prospects as a Corporate Venture Capital that supports the development of the digital ecosystem in Indonesia. With the increasing adoption of digital technology, investment opportunities in the fintech, fintech enabler, healthtech, edutech, and agritech sectors continue to grow, in line with the large potential of Indonesia's digital market. Focusing on sustainability-based startups (ESG) is also a strategic step in line with global trends, opening up new opportunities for investment portfolio growth.

BNI Ventures is committed to maximizing potential by consistently seeking startups in the early stages and growth stages that have promising investment prospects, especially those that can synergize with the BNI Group ecosystem. In realizing this goal, BNI Ventures organizes acceleration and incubation programs by collaborating with strategic partners, opening investment opportunities to the global market. This program is designed to accelerate the growth of startups to reach their maximum potential, while providing strategic benefits for the BNI Group in facing competition in the digital economy sector. In addition to being a means for BNI to win the digital economy market, BNI Ventures also plays a role in driving the acceleration of digital transformation in the BNI Group ecosystem.

Subsidiary Segment Profitability

Overall, the revenue and profitability of the Subsidiary Company segment are presented as follows:

Account	2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Profit (Loss)					
Interest income - Net*)	990	632	358	56.6	↑
Premium income - Net	1,724	1,659	65	3.9	↑
Other operating income	989	872	117	13.4	↑
Establishment of impairment reserve	(230)	(125)	(105)	84.0	↑
Other operating expenses	(2,792)	(2,444)	(348)	14.2	↑

Account	2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		
			Nominal (IDR-billion)	Percentage (%)	
Operating profit	681	594	87	14.6	↑
Income Before Tax Expenses		483		7.4	↑
Tax expense	561	483	78	16.1	↑
Net profit	(53)	(62)	9	(14.5)	↓
Financial Position	509	421	88	20.9	↑
Total Assets					
Total Assets	**52,994**	**46,283**	**6,711**	**14.5**	↑
Total Liabilities	**39,400**	**32,940**	**6,460**	**19.6**	↑

SUBSIDIARY SEGMENT PROSPECTS, POTENTIAL AND STRATEGIES FOR 2025 FOR THE FUTURE

BNI Life

The Company consistently strives to strengthen its capacity in facing challenges within the life insurance industry while continuing to deliver added value to stakeholders and enhancing business sustainability for the future.

The recent surge in health claims has become a prominent issue in the life insurance industry. This situation is driven by factors such as medical cost inflation, over-utilization of benefits, overtreatment in hospitals, and extreme climate changes. In response to these challenges, BNI Life has implemented improvements, including strengthening its underwriting processes and evaluating the suitability of products and premiums.

The Company is also preparing for the implementation of the Financial Accounting Standards Statement (PSAK) 117, which will take effect on January 1, 2025. Preparations for this include system readiness, particularly in enhancing the Company's reporting framework.

In addition, the Company plans to adopt broader technological advancements, such as mobile applications, data analytics, and artificial intelligence. These technologies will enable the company to distribute its products and services more effectively and efficiently, reaching a wider audience.

BNI Life's key strategies for 2025 are as follows:

1. Increasing regular premiums and profitable products.
2. Improving the business model.
3. Enhancing financial management.
4. Driving cost efficiency and management.
5. Strengthening risk mitigation.
6. Optimizing business processes.
7. Developing organizational and human resources.
8. Preparing for the spin-off of its Sharia business unit.

BNI Sekuritas

BNI Sekuritas will continue to provide the best solutions for clients and customers and improve the Company's position in the country's capital market industry. BNI Sekuritas' business strategy which to be implemented in 2025 will focus on developing solutions and services, marketing development and synergy with the BNI Group in a number of Company businesses including Retail Brokerage, Institutional Equities Brokerage, Institutional Fixed Income Brokerage, as well as Securities Underwriting and Advisory.

BNI Finance

BNI Finance consistently strives to strengthen its presence and position itself as a top-tier player in the financing industry. Various strategic initiatives have been prepared in alignment with the Company's transformation over the past two years. The Company aims to enhance synergy with its parent entity through joint financing while leveraging Bank BNI's customer database to acquire new consumers for BNI Finance.

Business processes will be fully digitalized through the implementation of a credit scoring system, Bank Statement Analyst, Dashboard Management, and other technological advancements that optimize existing operations. In its financing activities, the Company remains committed to prudent risk management to ensure sustainable business growth.

The key strategic initiatives that BNI Finance will implement in 2025 include:
1. Growth of high-quality financing assets
2. Strengthening business processes
3. Enhancing internal controls
4. Advancing information technology
5. Developing human resources and organizational capacity
6. Strengthening funding sources
7. Enhancing synergy with the parent company and business group

BNI Remittance

Currently BNI Remittance together with BNI KLN Hong Kong is conducting a comprehensive study to prepare for business transformation. This is being done as a responsive step to changes in customer transaction patterns in Hong Kong. In 2025, the target for business transformation will be carried out so that efficient business patterns and increasing market share in the remittance business in Hong Kong can be executed well.

hibank

In 2025, as a continuation of the transformation process stages that have been undertaken, hibank will advance to the next phase, focusing on strengthening the infrastructure and organization built during the transformation phase. This effort aims to ensure sustainable business growth with a primary focus on the Micro, Small, and Medium Enterprises (MSME) segment.

hibank's Business Development Strategy for 2025:
1. Prudent business growth in the digital supply chain through strategic engagement with principals, suppliers, distributors, sub-distributors, and retailers.
2. Strengthening end-to-end visibility within selected ecosystems to reinforce its role as an orchestrator of the MSME ecosystem.
3. Automating business processes to support the digitalization of operations from the middle to the back end.
4. Competing to become a leader in human capital capabilities, driven by a high-performance culture.
5. Enhancing business efficiency through the digitalization of processes and operations, supported by a strong digital work culture.
6. Increasing customer acquisition through digital channels.

To support business growth in alignment with its Vision and Mission, the following is a summary of hibank's optimistic and forward-looking work plans and initiatives for 2025:
1. Establishing partnerships with key anchors as entry points for holistic business chain engagement, alongside credit distribution through channeling and joint financing with selected Fintech Lending customers.
2. Increasing customer transactions—both individual and corporate—through digital banking by providing comprehensive banking solutions and acquiring new customers via community-based approaches.
3. Boosting fee-based income from loan-related fees, third-party fund (TPF) account services (administration fees, transfers), bancassurance products, and treasury activities.
4. Developing products, features, and electronic channel services to facilitate more efficient business operations for MSMEs, enhancing accessibility and user convenience.
5. Reviewing the performance of existing branch offices regularly, focusing on productivity, profitability, customer acquisition, transaction levels, and business potential in each region.
6. Launching new products and activities, ensuring that flagship products are competitive, value-added, and tailored to meet current customer needs.
7. Establishing a strong brand image as the Digital-First Bank for MSMEs in Indonesia.
8. Ensuring the Bank's financial health remains at a sound level while maintaining stability and customer trust.

BNI Ventures

BNI Ventures is committed to managing its Venture Fund in 2025 by adopting a diversified portfolio approach, with a focus on strategic sectors. Fund management will be directed towards achieving a balanced allocation between early-stage and growth-stage startup investments.

Enhancing investment disbursement activities will also be a key strategic priority. The investment deployment process will be accelerated through the enhancement of capabilities to improve the quality of due diligence. BNI Ventures will proactively build a strong investment pipeline by scouting startups through incubators, accelerators, and startup summit events. In addition, collaboration with other venture capital (VC) and corporate venture capital (CVC) firms will be strengthened to unlock greater co-investment opportunities.

In addition, BNI Ventures will explore venture debt-based funding products as an alternative to startup funding that does not involve the release of equity. This product is designed to meet the working capital needs of startups by offering flexible funding schemes and competitive interest rates. For its implementation, BNI Ventures will conduct in-depth market research, launch a pilot program, and collaborate with BNI Group to provide integrated funding solutions that support startup growth.

As part of the BNI Group, BNI Ventures will form strategic partnerships with startups that can provide direct added value to the group's performance. Identification of startups that are relevant to BNI Group's business needs will be carried out to maximize synergies. The Innovation Program will be launched to facilitate collaboration, including the integration of startup technology into the BNI Group's digital ecosystem such as payment services, lending, and data processing.

Through these strategic initiatives, BNI Ventures aims to create a significant positive impact on Indonesia's digital ecosystem while strengthening BNI Group's position in the era of digital transformation. The success indicators of this work plan include an increase in ROI, the acceleration and growth of investment disbursement volumes, as well as the number of strategic partnerships that effectively enhance BNI Group's overall performance.

In line with the growth of the Company's organization and industrial development, BNI Ventures plans 4 (four) work programs which are planned to be implemented during 2025. The four work programs are investments with added value synergies, issuance of venture fund instruments, synergy activities along with innovation programs, and other strategic actions.

Investment activities will be driven by the synergy potential that can create added value between prospective investees and BNI Group's business units. Investments may be carried out through instruments such as direct equity purchases, convertible bonds, or other instruments agreed upon by the parties. The investment process will adhere to the company's internal procedures and applicable regulatory requirements. Additionally, the principle of prudence will remain a priority through the strengthening of risk management and portfolio management.

BNI Ventures is also preparing to issue venture funds, as one of BNI Ventures' efforts to increase its investment scale by collaborating with strategic partners. Apart from that, venture funds can also become a source of new, sustainable income which will be managed separately with an independent and prudent structure. Not to mention, by issuing venture funds, BNI Ventures can also expand the diversity of its investment portfolio in other sectors that have the potential for better returns in the market in accordance with the venture fund theme.

In 2024, BNI Ventures actively contributed to industry development through synergy activities and innovation programs. The innovation program plans to enhance capacity and capabilities, including incubators, accelerators, and venture builders. This indicates that BNI Ventures is seriously committed to fostering the creation of innovations and industry trends that impact the maturity and independence of startup entrepreneurs in Indonesia.

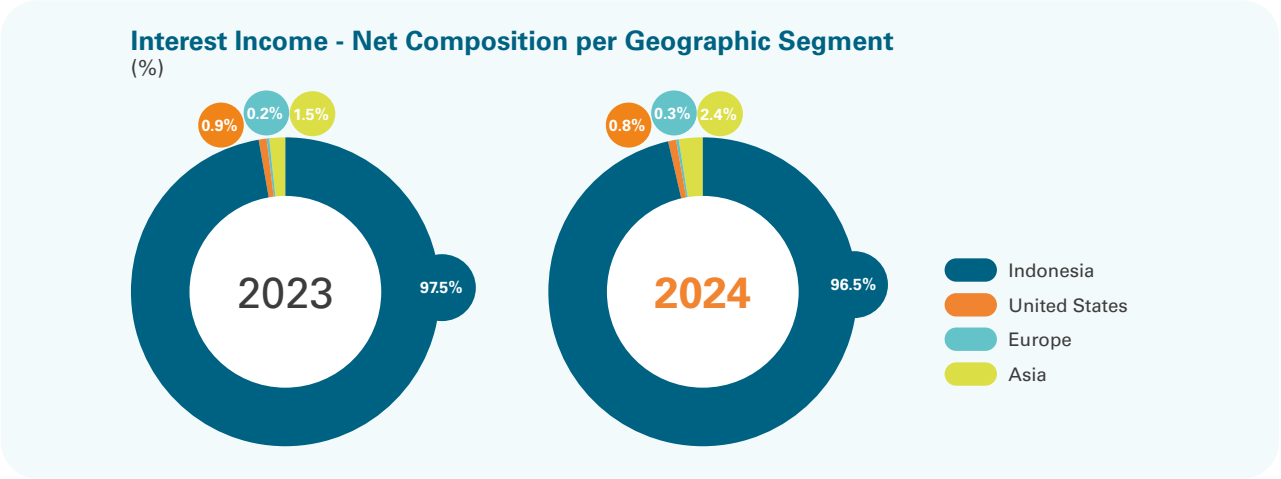
Apart from that, as an agent of change within the BNI Group, BNI Ventures also helps realize the targets and objectives of Bank BNI as the parent company through mandated strategic actions. Apart from being a form of investment vehicle management at BNI, this transaction also provides proof that BNI is fully committed to realizing the government's policy direction to increase and optimize the potential of the digital economy in Indonesia.

GEOGRAPHICAL SEGMENT

In addition to presenting operating segments based on main customer groups and products, BNI's Audited Financial Report also presents geographic segment information that can provide an overview of BNI's business distribution. BNI's geographical segment is divided into Indonesia, the United States, Europe, and Asia. To provide an overview of the distribution of business from the geographical segment, the following shows the contribution per region to BNI's interest income and total assets.

Interest Income - Net Composition per Geographic Segment

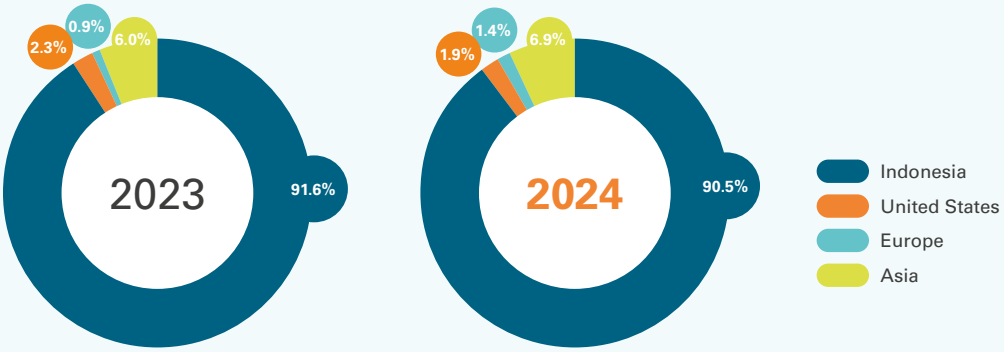
Segment	2024		2023		Increase (Decrease)		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	
Indonesia	39,082	96.5	40,235	97.5	(1,153)	(2.9)	↓
United States	311	0.8	352	0.9	(41)	(11.6)	↓
Europe	132	0.3	86	0.2	46	53.3	↑
Asia	953	2.4	629	1.5	324	51.5	↑
Adjustment and Elimination	2	0	(26)	(0.1)	28	(107.7)	↑
Total Interest Income - Net	**40,480**	**100.0**	**41,276**	**100.0**	**(796)**	**1.9**	↓



Bank Assets Composition per Region

Segment	2024		2023		Increase (Decrease)		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	
Indonesia	1,022,444	90.5	995,001	91.6	27,443	2.8	↑
United States	21,339	1.9	24,964	2.3	(3,625)	(14.5)	↓
Europe	15,820	1.4	10,200	0.9	5,620	55.1	↓
Asia	77,876	6.9	64,844	6.0	13,032	20.1	↑
Adjustment and Elimination	(7,673)	(0.7)	(8,345)	(0.8)	672	(8.1)	↑
Total Interest Income - Net	**1,129,806**	**100.0**	**1,086,664**	**100**	**43,142**	**4.0**	↑

Composition by Region to Bank Assets
(%)



It can be seen from the table and graph above that in 2024, the Indonesian region contributed significantly to BNI's net interest income and sharia income and also to the Bank's total assets. The Bank's net interest income contribution in 2024, other than the Indonesian region, decreased by IDR1.2 trillion or 2.9% compared to 2023 of IDR40.2 billion. Meanwhile, the regional contribution to the Bank's assets in 2024, other than the Indonesian region, amounted to IDR27.4 trillion or 2.8% from the previous year.

The financial performance of the Geographic Segment in 2023-2024 can be presented as follows:

Account	Indonesia				United States			
	2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)	
			Nominal (IDR-billion)	Percentage (%)			Nominal (IDR-billion)	Percentage (%)
Profit (Loss)								
Interest income - Net	39,082	40,234	(1,152)	(2.9)	311	352	(41)	(11.6)
Premium income - net	1,724	1,659	65	3.9	0	-	0	0
Operating income	22,055	19,743	2,312	11.7	55	41	14	34.1
Establishment of allowance for impairment losses	(8,046)	(9,142)	1,096	(12.0)	15	20	(5)	(25.0)
Other operating expenses	(29,023)	(27,140)	(1,883)	6.9	(198)	(287)	89	(31.0)
Operating profit	25,793	25,354	439	1.7	182	126	56	44.4
Non-Operating Income (Expense) - Net	(48)	(131)	83	(63.4)	10	-	10	100.0
Profit Before Tax Expenses	25,744	25,223	521	2.1	192	126	66	52.4
Tax Expenses	(4,911)	(4,534)	(377)	8.3	0	-	0	0
Net Profit	20,833	20,690	143	0.7	192	126	66	52.4
Financial Position								
Total Assets	**1,022,444**	**995,001**	**27,443**	**2.8**	**21,339**	**24,964**	**(3,625)**	**(14.5)**
Total Liabilities	**849,867**	**834,842**	**15,025**	**1.8**	**21,496**	**25,143**	**(3,647)**	**(14.5)**

	Europe				Asia			
	2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)		2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease)	
			Nominal (IDR-billion)	Percentage (%)			Nominal (IDR-billion)	Percentage (%)
	132	86	46	53.3	953	629	324	51.5
	0	0	0	0	0	-	0	0
	206	180	26	14.4	490	390	100	25.6
	40	(23)	63	(273.9)	(219)	(52)	(167)	321.2
	(230)	(195)	(35)	17.9	(687)	(625)	(62)	9.9
	148	48	100	208.3	538	342	196	57.3
	0	(1)	1	100	4	1	3	300
	148	47	101	214.9	542	343	199	58.0
	0	0	0	0	0	0	0	0
	148	47	101	214.9	542	343	199	58.0
	15,820	**10,200**	**5,620**	**55.1**	**77,876**	**64,844**	**13,032**	**20.1**
	15,985	**10,352**	**5,633**	**54.4**	**78,375**	**65,398**	**12,977**	**19.8**

Digital Banking

BNI is implementing a digital banking initiative as one of its main agendas where the key objective is to provide banking services to facilitate customers as they are making online financial transactions through multiple digital platforms. While this is applied internally, BNI also implements digital initiatives to support the 2030 Indonesian Payment System Blueprint (BSPI) issued by Bank Indonesia to encourage the payment industry so it can transform digitally within the framework of developing open banking, data openness, improving retail payment systems, and interlinks between banks and other players in the digital financial service sector.

Based on data from Bank Indonesia (BI), the performance of digital economic and financial transactions in August 2024 remained robust, driven by a safe, smooth, and reliable payment system. In terms of large value, BI-RTGS transactions increased by 11.73% (YoY) to reach IDR14,731 trillion. In retails, the volume of BI-FAST transactions grew by 59.12% (yoy) to reach 312.67 million transactions. Digital banking transactions reached 1,871.19 million transactions, up 31.11% (YoY), while Electronic Money (EU) transactions grew by 21.53% (YoY) to reach 1,246.58 million transactions. Payment transactions using ATM/D cards fell by 6.82% (YoY) to 591.92 million transactions. Credit card transactions grew by 22.79% (YoY) to reach 41.59 million transactions. QRIS transactions showed another rapid growth of 217.33% (YoY), with 52.55 million users and 33.77 million merchants.

BNI has continued to improve digital banking to provide convenience, speed, and comfort for customers, which can be accessed through multiple digital banking service using digital tools, from mobile devices, desktops, as well as ATMs and CRM. BNI has been very consistent in its effort to to improve digital capabilities and continues to innovate in developing customer-driven digital financial solutions.

BNI brings digital excellence through several channels to the retail and wholesale segments, including wondr by BNI, BNI Mobile Banking, BNIdirect, SMS Banking, Internet Banking and ATM/CRM. There are various prominent features, such as Online Debit, SMS Notification as well as Digital Card Issuance. In addition to Company initiatives, BNI also supports government programs, especially Bank Indonesia, to continue to encourage the acceleration of digitalization of payment systems and expansion of cooperation to encourage financial inclusion in the digital economy era.

In supporting customer convenience with their banking transaction activities, BNI offers superior products, namely wondr by BNI and BNI Mobile Banking for retail customers and BNIdirect for wholesale customers. Both superior products have won various national and international awards. In each of the products, there are various customer-centric features that are able to adjust to customer needs for daily activities. These various digital products are supported by qualified IT capabilities, advanced data analytics and Open APIs, making it easier for customers to access their favorite services.

As of December 31, 2024, as many as 18.1 million customers had become users of BNI Mobile Banking which increased by 14.8% compared to the previous year. In line with digital transformation as one of the company's main agendas in 2024, BNI has launched a new application called wondr by BNI. The launch of wondr by BNI on July 5, 2024, coinciding with BNI's 78th anniversary, manifests BNI's transformation in presenting innovative banking applications to facilitate transactions as well as more optimal community future planning. BNI hopes that wondr by BNI can be a solution in improving more comprehensive community banking activities through the 3 Dimensions of Finance feature (Transaction, Insight, and Growth).

Featured with 3 unique Financial Dimensions; Insight allows customers to daily monitor and manage their finances more optimally based on complete historical data. Through Transactions, it supports customers' real-time financial needs with features such as domestic transfers, bill payments, and transfer schedule settings, all of which can be done with simple steps, making it easier for customers to manage daily transactions. Meanwhile, Growth focuses on future planning by providing a variety of financial product options that best suit customers' needs, such as investments and savings, providing the customers with an opportunity to grow and develop financially depending on their future goals.

DIGITAL BANKING PRODUCTS AND SERVICES FOR CONSUMERS

1. wondr by BNI

Launched on July 5, 2024, wondr by BNI is a new mobile banking application that has been equipped with the latest technology with global standards, offering services that are more personalized and tailored to the needs of each customer in managing finances and planning for the future. One of the advantages of wondr by BNI includes 3 financial dimensions that will be a solution for customers, namely Transaction, Insight & Growth. Promoting Hyper-Personalization by utilizing data and analytics to offer services that are more personalized and tailored to the needs of each customer. The wondr by BNI application is equipped with 3 Dimensions of Financial feature (Transaction, Insight, and Growth), which reflect the concept of the present, past, and future to be able to provide the best banking experience in transactions and planning for the future.

wondr by BNI Performance

wondr by BNI Performance	2024
Users (millions)	5.3
Number of Transactions (million)	195
Transaction Volume (IDR-billion)	191



2. ATM and CRM

This Banking service channel is ready to facilitate customers 24 hours a day to conduct cash withdrawals (Cash Recycle Machine/CRM), balance checks, transfers, payments and purchases. As of December 31, 2024, BNI had 13.388 ATM/CRM machines, including 2,990 ATMs for people with disabilities throughout Indonesia, connected to ATM Link, Merah Putih, Bersama, Prima, Alto networks, and international networks such as Mastercard, Visa, JCB, APN, Union Pay and Cirrus.

ATM Performance

	2024	2023	Increase (Decrease)		
			Nominal	Percentage (%)	
Number of Transactions (million)	912	1.189	(277)	(23.2)	↓
Transaction Volume (IDR-trillion)	630	631	(1)	(0.2)	↓

The decline in ATM/CRM transactions reflects the shift in user behavior along with the development of digital channels by BNI, such as mobile banking for daily transaction needs (credit purchases, electricity tokens, e-commerce payments). The trend of digitalization and cashless transactions, especially in big cities, is also a factor in people's reliance on cash. However, that growing trend has not fully affected the company in optimizing ATM/CRM machines as BNI continues to develop ATM/CRM channels through cooperation with various parties to meet the needs of segments that still rely on cash transactions.

The development of ATM/CRM channels focuses on developing partnerships with various third parties such as e-Commerce partners and various BPDs in Indonesia to provide cardless cash withdrawal banking services and various other services. In addition, the development of ATM/CRM channels is also focused on the development of CRM channels, where customers can make cash deposit and withdrawal transactions without having to go to a branch. The use of this CRM channel in the long term makes it easier for customers to make the transition from cash to digital transactions, thus creating a cashless society supported by various BNI digital banking products.



3. BNI SMS Banking

BNI SMS Banking is a banking service facility that can be used by customers for transfers, payments and purchase transactions, which can be accessed via the BNI SMS Banking application (for Android & iOS based smartphone users), SMS Syntax and USSD access *141#. The SMS Banking service provides banking transaction inclusiveness and convenience for BNI customers who want to make financial transactions, but are in areas that have low internet connectivity.

SMS Banking Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Users (millions)	12.7	12.6	0.1	0.8 ↑
Number of Transactions (million)	688	660	28	4.2 ↑
Transaction Volume (IDR-billion)	8.5	16.8	(8)	(49.4) ↓

SMS Banking services remain customers' preferred option in making transactions such as same-bank or inter-bank transfers, BIFAST, e-wallet top ups, and bill payments. The recently faster development of infrastructure that can reach rural areas such as villages has caused a decline in the use of SMS Banking. However, this should not be misconstrued as BNI is paying less attention to this channel, instead BNI is utilizing it as an optional channel that can accommodate the needs of customers in areas where internet access has not been adequate.

4. BNI Internet Banking

Through BNI Internet Banking, customers can enjoy banking service channels that can be accessed via a web browser with the BNI Internet Banking URL. Not only transactional services, BNI Internet Banking also has a flagship feature in the form of Personal Financial Management that allows customers to make financial plans according to their needs, complete with automatic deposit scheduling, and can be used to monitor cash flow and trends in spending/incoming funds in graphical form. BNI Internet Banking is also equipped with security standards that use two types of financial transaction authorization tools, namely BNI e-Secure and BNI m-Secure based on customer needs when conducting business transactions.

Internet Banking Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Users (millions)	2.2	2.2	0	0.0
Number of Transactions (million)	10.3	13.6	(3)	(24.3) ↓
Transaction Volume (IDR-billion)	18.9	29.5	(11)	(35.9) ↓



5. BNI Mobile Banking

BNI Mobile Banking is BNI's flagship product that makes it easier for customers to make transactions anywhere and anytime. There are several features that are superior to BNI customers, namely interbank transfers, telco purchases/payments and utilities. BNI Mobile Banking product has value-added features, such as a digital account opening feature, fast payments with QRIS Payment, cardless cash withdrawals both at ATMs and BNI partners such as Alfamart and Indomaret, investments, foreign exchange transactions in your own account via FX Mobile, International Transfer, Lifestyle such as ordering taxis (Bluebird) and fast trains (Whoosh), and these provide convenience, speed and comfort in customer transactions.

Mobile Banking Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Users (millions)	18.1	16.2	1.90	11.7 ↑
Number of Transactions (million)	1,379	1,043	336	32.2 ↑
Transaction Volume (IDR-billion)	1,495	1,215	280	23.0 ↑

The growth of both users and transactions in BNI Mobile Banking in terms of users and transactions shows the positive impacts of BNI's continuous feature development and business in collaboration with competent partners, especially on BNI customers. BNI Mobile Banking has proven successful in providing easy transactions anywhere and anytime. This transactional capability, in turn, encourages inclusive and sustainable banking, especially for customers in rural areas and overseas.

6. BNI Credit Card Mobile

Apart from using the Mobile Banking/wondr by BNI application, BNI credit card services can also be accessed via the BNI Credit Card Mobile application, an application that makes it easier for credit card holders to access their transaction information via smartphone. BNI Credit Card Mobile is equipped with features such as billing information, recording transactions, installment conversions, bill payments and insurance registration, cash withdrawals, as well as credit limit increase application services, and data updates and new credit card applications. BNI Credit Card Mobile also provides information on BNI Credit Card promos and products.

7. E-KYC Biometric Face Recognition & Liveness

Using the Biometric Face Recognition & Liveness feature as e-KYC in the digital credit card application process provides convenience, security and comfort for prospective card holders in the credit card application process.

8. Digital Card Issuance

Issuance of Digital Credit Cards for those applying for BNI credit cards via digital channels, so that card holders can use their digital credit cards to make transactions at e-commerce merchants or carry out transactions at BNI Mobile Banking.

9. Virtual Card Number for BNI Credit Card

The BNI Credit Card feature is an effective and efficient alternative payment for credit card transactions that provides comfort and convenience in online transactions (card not present) using a unique virtual number as a replacement for the original credit card number used in the BNI Corporate Credit Card.

10. QRIS Source of Funds for Domestic Government Credit Cards (KKPD)

The QRIS payment feature with Domestic Government Credit Card funding sources using BNI Mobile Banking aims to facilitate operational spending and work unit (Satker) official travel, both at the central and regional levels with the Government Credit Card (KKP) payment scheme where processing is carried out through domestic principals.

11. Fitur Contactless

With the Contactless feature, card holders can make transactions easily, quickly and safely by simply holding or tapping their credit card on the EDC Contactless machine, without having to use a PIN (certain nominal amount). Transactions can be made at any time by card holders at merchants displaying the contactless symbol.

12.SMS Notifikasi

An information service for customers' banking transactions delivered via SMS to the mobile number registered by the customer for notification of customers debit/credit transactions, especially BNI Taplus/ BNI Giro IDR Individual account holders. Through SMS Notifications, customers will be informed about all financial transactions that occur in their accounts, and help prevent potential unauthorized transactions.

13.BNI Debit Online

BNI Debit Online (BDO) is a method of paying for online transactions using a Virtual Card Number (VCN) requested via BNI Mobile Banking, thus providing convenience for customers making transactions. The Virtual Card Number also increases the security of customer accounts by preventing the customer's original debit card number from being known by third parties.

14.BNI Agen46

BNI Agen46 are BNI's partners that provide banking services to the community in the context of financial inclusion. BNI Agen46 are also partners in Government programs, such as the distribution of social assistance and subsidies for beneficiary families.

Through BNI Agen46, banking transactions become easier, faster and closer to the surrounding community, especially in rural areas that are not yet reached by banking services. With the number of agents continuing to increase every year, BNI Agen46 act as an extension of the BNI channel so at to exploit the business potential of the surrounding community, such as the potential for TPF receipts through Smart Savings (Tabungan Pandai), making banking transactions such as payments and purchases, and can be used for potential referral transactions for the distribution of People's Business Loans (KUR), BNI Entrepreneurship (BWU), BNI Credit Card, adnd others.

BNI Agen46 Performance

	2024	2023	Increase (Decrease)		
			Nominal	Percentage (%)	
Number of BNI Agen46 (agents)	213,370	185,697	27,673	14.9	↑
Transaction Volume (IDR-million)	79.4	85.5	(6.1)	(7.1)	↓
Fee Based Income (IDR-million)	225.8	92.2	133.7	144.9	↑
TPF BNI Agen46 (IDR-trillion)	4.8	3.7	1.2	29.7	↑

The number of BNI Agen46 continues to increase and expands the reach of banking transaction services to the public. In 2024, the number of BNI Agen46 grew by 14.9%, in 6,196 districts and 34,241 sub-districts/ villages throughout Indonesia. The number of transactions generated by BNI Agen46 in 2024 reached 79.4 million transaction with the dominant transactions being transfers, cash withdrawals, credit purchases, electricity payments and travel ticket purchases. The increase in BNI Agen46 chargeable transactions had a positive impact on the achievement of Fee Based Income which grew by 144.9% (YoY) in 2024. This also had an impact on the increase in BNI Agen46 Operational TPF which grew by 29.7% (YoY) in 2024.

BNI Agen46 is targeted to expand the number of agents by more than 15% and fee based income by more than 30% with a focus on expanding to qualified BNI Agen46 candidates to generate fee based income through transactions by customer-based agents. The increase in BNI Agen46 business in the future will focus on massive business execution targeting the community, potential market captive customers and debtors, value chance ecosystem, and potential customer base balanced with system development, expansion of super agent partner cooperation and strengthening marketing campaigns.



15. BNI TapCash

As part of the all-in-one digital financial ecosystem, BNI has a superior card-based electronic money product, called BNI TapCash. There are several advantages of BNI TapCash, namely:

a. The transaction experience is just a matter of tapping
b. Fast transaction speed
c. Ease of BNI TapCash top up channels through several BNI channels including BNI Mobile Banking, ATM/CRM, EDC, and BNI Agen46, as well as strategic partner channels such as Tokopedia, Shopee, Gopay, LinkAja, Blibli, Indomaret, Alfagroup, and other strategic partners.
d. Acceptance of BNI TapCash cards in payment ecosystems, such as tolls, parking, transportation (KRL, LRT, MRT, TransJakarta), modern retail stores (Alfagroup, Indomaret), tourist attractions, Government institutions and other payment ecosystems.

TapCash Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Number of Transactions (million)	116.0	93.0	23	24.7 ↑
Transaction Volume (IDR-billion)	2,779.0	2,259.0	520	23.0 ↑

Until December 2024, BNI recorded an increase in the number of BNI TapCash transactions reaching 116.0 million or an increase of 24.7% (YoY) from the previous of 93.0 million. Transaction volume also increased by 23.0% (YoY) or reached Rp2,779.0 billion from Rp2,259.0 billion in the previous year. Community movement during Eid was one indicator of an increase in BNI TapCash transactions, when the volume of BNI TapCash card use increases for transportation used for going home, and in toll roads, rest areas and tourist attractions.

The increase in BNI TapCash card transactions has been driven by several factors, including the development of the TapCash top-up mechanism within the wondr by BNI application and growth in the transportation sector, particularly in parking services, due to the rising number of parking partners collaborating with BNI. Additionally, BNI has partnered with Regional Development Banks (BPD) and other institutions to provide cashless payment services through BNI TapCash. Furthermore, BNI continues to expand into various new merchants, including those in the Food and Beverage (F&B) and entertainment sectors.



16.BI-FAST

BI-Fast is Bank Indonesia's payment system infrastructure to facilitate retail payments that can be accessed at any time. BNI as a SOE has been a BI-Fast participant since it was first launched in 2021. BNI as one of the state-owned banks has become a participant to support the creation of an integrated, interoperable and interconnected digital ecosystem.

To improve services, in 2024 new features were added in the BI-Fast transaction system, including:

a. BI FAST API development: carried out to facilitate interbank transfer services using the BI FAST scheme based to standards issued by Bank Indonesia (SNAP API).
b. Direct Debit: A feature designed to make it easier for customers to pay monthly bills with autodebit, bill payments can be made inclusively between banks so that it is simpler and can be done automatically via the BI-Fast platform.
c. RFP (Request for Payment): A feature that allows customers to easily make requests to transfer funds to other customers. This smoother process is expected to reduce difficulties in daily financial transactions.
d. Bulk Credit Transfer: This feature allows corporate customers to use BNIdirect to make transfers to several account destinations simultaneously.

Benefits of these innovations include:

a. Fast: More efficient transactions allowing time savings.
b. Easy: Intuitive user interface making it easy to carry out transactions.
c. Cheap: Competitive transaction fees for all payment types.
d. Safe: Latest security features to protect customer data and funds.
e. Reliable: A stable and reliable system for all financial transactions.

BI FAST Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Number of Transactions (million)	556.6	361.9	194.7	53.8
Transaction Volume (IDR-billion)	1,497,075.3	975,821.3	521,254.0	53.4

During 2024, total BI-Fast transactions increased by 54% with an increase in the total nominal transactions reaching 53% compared to the previous year. Thus showing an increasing adoption and trust of customers in fast and efficient payment systems. The significant increase in BI-Fast services usage is in line with efforts to improve systems and services for customers. The strategy to increase BI-FAST transactions includes improving technological infrastructure, and increasing security features.

17. BNI Merchant Business

BNI's Merchant Business services consists of Electronic Data Capture (EDC), Quick Response Code Indonesian Standard (QRIS) and Online Merchant transactions (Acquiring Online) as part of increasing the digitalization of financial transactions, especially retail transactions. One of BNI's strategies to develop its merchant business is acquisitions at hype locations in Indonesia, and excellent after sales service.

The BNI EDC network serves payment transactions using payment instruments in the form of cards (debit, credit and prepaid cards) and QRIS.The BNI merchant network has wide acceptance, and is a collaboration between BNI and global principals such as VISA, MasterCard, JCB, American Express (AMEX), China UnionPay, and the National Standard, called the Nusantara Payment Gateway (GPN).

In addition, BNI offers superior services such as payments via BNI QRIS using the National QR code standard. With QRIS, BNI Merchants can receive payments from the BNI Mobile Banking application or from other payment service providers (other bank applications, e-wallet applications such as Gojek, DANA, etc.). There are 2 types of QRIS payments used at BNI, namely:

a. Merchant Presented Mode (MPM), where QR customers at BNI Merchants can transact using all application providers connected to the QRIS network.
b. Customer Presented Mode (CPM), where BNI Mobile Banking customers can make QRIS transactions at all QRIS network merchants by simply scanning the QR code generated by the BNI Mobile Banking application.

To increase QRIS transactions, BNI has collaborated with strategic partners such as Government institutions, such as Ministry of Finance and BPJS Employment), fintech, educational ecosystems, hospitals, markets, and others.

In terms of products, BNI is also innovating with new products including QRISTUNTAS (Transfer, Withdraw and Cash Deposit), which allows users to transfer funds between QRIS users via BNI Mobile Banking, as well as make cash withdrawals and cash deposits at ATM and CRM, BNI Agen46 and Partners. In addition, to facilitate international transactions via QR, BNI will launch a QR Cross Border product to make it easier for BNI customers to carry out QRIS-based payment transactions in countries such as Thailand, Malaysia, Singapore (following countries such as Japan, Vietnam, Brunei Darussalam, India, China and South Korea).

BNI also supports merchant convenience through the BNI Merchant application that offers several superior features such as same-day merchant payments, digital merchant registration, transaction notifications in real time transaction reports, and biometric login capabilities.

As well as EDC and QRIS, BNI also has Online Acquiring products, services provided to e-commerce merchants or online merchants. Through online acquiring, customers can carry out different types of transactions such as purchasing goods and services online and other services.

QRIS Performance

	2024	2023	Increase (Decrease)		
			Nominal	Percentage (%)	
Number of Transactions (million)	145.4	60.5	84.9	140.3	↑
Transaction Volume (IDR-billion)	21,224.5	6,947.9	14,276.6	205.5	↑

BNI saw a rapid growth in QRIS transactions in line with the increase in digital payment transactions. Up to December 2024, QRIS transactions grew by 140.3% (YoY), and transaction volume grew by 205.5% (YoY), to reach IDR21,224.5 billion. BNI will continue to expand the network and cooperation in using QRIS through BNI Mobile Banking and QRIS merchant acceptance.

Merchant Business Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Number of Transactions (million)	459.0	270.0	189.0	70.0 ↑
Transaction Volume (IDR-billion)	113,205.9	87,000.0	26,205.9	30.1 ↑

In 2024, BNI recorded transaction growth of 70% (YoY) and Transaction Volume growth of 30.1% (YoY). This was achieved with strategic partnerships with principal networks such as VISA, MasterCard, JCB, American Express (AMEX), China UnionPay, and the National Standard called Nusantara Payment Gateway (GPN), as well as by expanding the merchant network and excellent after sales services from BNI to support improving merchant business performance.



18. Source of funds credit card in BNI Mobile Banking

Customers can carry out BNI credit card transactions on BNI Mobile Banking using the QRIS feature & bill payment feature that provides convenience & a better customer experience in carrying out transactions and paying bills using credit card funding sources.

19. BNI DigiCS & DigiCS Lite

BNI DigiCS & DigiCS Lite are self-service machines that replace the need for Customer Service (CS) officers. With BNI DigiCS & DigiCS Lite, customers can carry out CS activities independently (self-service). The features include account opening, changing cards, unblocking debit cards, activating e-channels, resetting pins, purchasing and topping up Tapcash, and printing account movements/history.

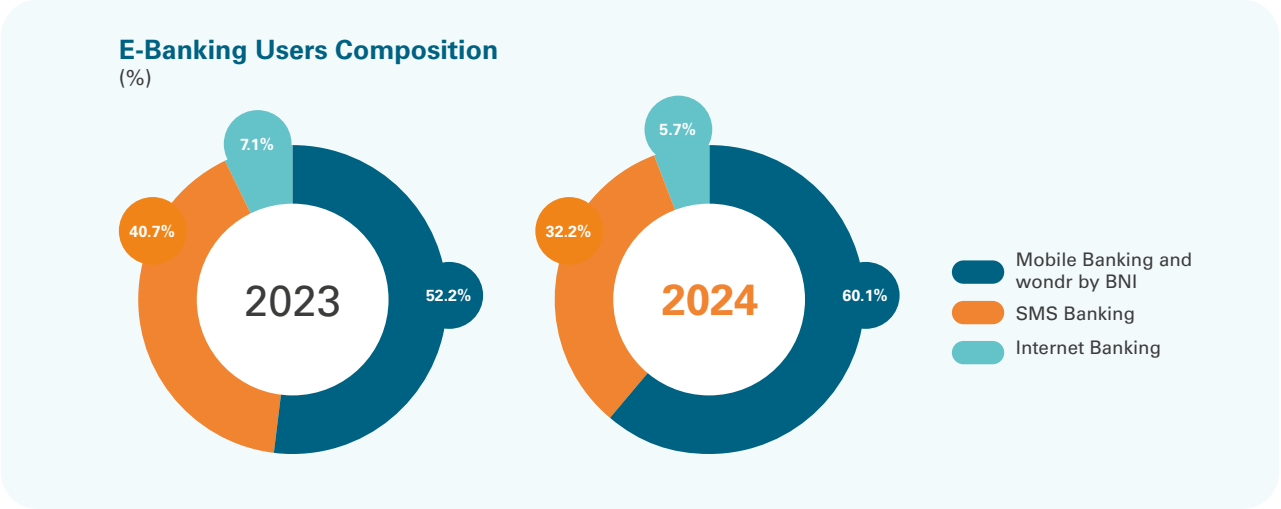
With the DigiCS & DigiCS Lite services, CS officers in branches can focus on CS advisory and sales activities. This service also reduces customer waiting time. Activities can be carried out quickly, easily and safely thanks to user friendly technology.

The Digital Banking products and services for Consumers performance can be seen below.

E-Banking Users Composition*)

	2024		2023		Increase (Decrease)	
	Total (users)	Composition (%)	Total (users)	Composition (%)	Nominal (user)	Percentage (%)
BNI Mobile Banking (million)	18.13	47	16.28	52	1.86	11.4
wondr by BNI (million)	5.30	14	-	-	-	-
SMS Banking (million)	12.71	32.2	12.70	41	0.01	0.1
Internet Banking (million)	2.24	5.7	2.22	7	0.02	0.9
Total	**38.38**	**100**	**31.19**	**100**	**7.19**	**23**

*) Data is presented based on the number of registered users in each product, not taking into account the possibility of customers registered as multi-product users.



By the end of 2024, for Digital Banking users, BNI mobile banking was the customers' first choice for transactions, showing that the programs and developments carried out by BNI are having a positive impact. This was carried out by BNI to support Government programs and the Company's internal initiatives to support economic growth in Indonesia in the digital financial sector.

DIGITAL BANKING PRODUCTS AND SERVICES FOR CORPORATIONS

BNIdirect

BNIdirect is an electronic channel provided by BNI for non-individual customers to carry out financial transaction activities from customer accounts at BNI more quickly, easily and safely. BNIdirect supports optimal business financial management through the following excellent features:

a. **360 view Financial Dashboard**
   This feature provides full visibility of the customer's financial condition, including cash flow, loans, deposits, and other financial information in real-time. The Financial Dashboard allows the customers to monitor in a one integrated view cash flow trends, loan information, deposits, and foreign exchange rates in. The comprehensive information supports fast and accurate data-based strategic decision-making, which is key element of a business success.
b. **Single Access to All Solutions**
   BNIdirect provides easy access through a single sign-on system, which allows customers to manage various services, such as Cash Management, Supply Chain, Trade, Receivables, and others, on one platform. With this system, customers do not need to remember many credentials to access services, allowing them to increase productivity and efficiency in managing financial transactions.

c. **Easy Onboarding Process**
The onboarding process at BNIdirect is designed to make it easier for customers to start services without getting caught up in complex administrative procedures. Now, customers can easily open Giro and Business Savings accounts through this platform, ensuring fast access to the financial solutions needed to support business operations.

d. **Security with Multi-Factor Authentication**
Security is BNIdirect's top priority. Through the implementation of multi-factor authentication, this platform ensures that only authorized parties can access transactions, providing additional protection that is essential in the digital era. This approach gives a sense of security for customers in carrying out financial activities online.

1. BNIdirect Cash

BNIdirect Cash is designed to provide convenience and efficiency in transactions through comprehensive features, such as collection management, payment management, liquidity management, foreign exchange transactions, online trading, and supply chain management. Transaction security is guaranteed through a hard token-based authorization system (BNI e-Secure) or soft token (mobile token) combined with flexible user authority settings according to customer needs.

This platform can be accessed via the web or mobile application, providing convenience for highly mobile customers. In addition, BNIdirect also provides multilingual services, including Indonesian, English, and Mandarin, to support various customer needs. A special responsive team has been prepared to give assistance at every stage of the transaction, both before (pre-transaction) and after (post-transaction) the process takes place.

a. **Collection Management**
BNIdirect Cash supports efficient fund collection through the Autodebit service, which enables automation of fund withdrawals, as well as Virtual Account, which provides unique identification for each transaction. This feature is designed to facilitate real-time fund reconciliation, supporting smooth business operations.

b. **Payment Management**
This service facilitates various types of payments, including mass payments, payroll, and tax payments, with high efficiency and timeliness. With the support of international connectivity, customers can also make payments in various currencies in an integrated manner, increasing flexibility in global transactions.

c. **Liquidity Management**
This feature optimizes cash flow management through strategic solutions such as:
- Cash Pooling: a Merging account balances to maximize the use of company liquidity.
- Range Balance & Target Balance: Management of account balances to ensure operational adequacy.
- Notional Pooling: Cross-currency management without physically moving funds, providing greater flexibility in managing finances.

d. **Online Open Account**
Customers can open Giro and Deposit accounts online through a real-time process, providing convenience and time efficiency. This solution is designed to support easy access to services without the complex administrative procedures.

e. **Information Management**
This feature gives comprehensive access to financial information, including:
- Account Balance and Bank Statement: Ensure full visibility of financial conditions.
- Exchange Rates and Interest Rates: Current information to support strategic decision making.
- Financial Statements: Reports that can be downloaded or sent via e-mail for in-depth financial analysis.

Going forward, BNI will remain to presenting new, more comprehensive and relevant solutions, which should support increasingly complex business needs in the future.

2. BNIdirect Supply Chain

BNIdirect Supply Chain is a solution for Corporations (Anchors) and Corporate Partners (Supplier/Buyer) in making electronic invoice financing transactions through the Supply Chain Financing (SCF) mechanism. This platform offers guaranteed security through a certified system and the application of authorization matrix approval for each transaction. In addition, BNIdirect Supply Chain provides convenience for customers in monitoring transactions in real-time, including the use of monitoring features, data storage, and provision of electronic reports.

SCF transaction services available through BNIdirect Supply Chain include:

- **Supplier Financing**: Financing to Corporate Partners (Supplier) for bills/receivables to Corporations that can be paid faster with a discount.
- **Distributor Financing**: Financing to Corporate Partners (Distributors/Buyers) to settle debts to Corporations with an extension of the tenor by the Bank and fees/interest charged upon settlement.
- **Receivable Financing**: Financing to Corporations (sellers) for accounts receivable/ unpaid bills.
- **Payable Financing**: Financing facility to Corporations (buyers) to pay off debts to Corporate Partners (Supplier) before the due date.

3. BNIdirect Trade

As part of BNI's digital innovation, BNIdirect Trade presents the GB Online service designed to support the efficiency and effectiveness of bank guarantee management for customers. With various superior features such as e-Application for online submission, e-Tracking to monitor issuance status in real-time, e-Reporting to present reports of bank guarantees issued and received, and e-Checking which allows verification of the validity of documents through a digital platform, GB Online provides convenience and security in every transaction. In addition, the BNI m-BG Checking feature strengthens this service with document validation through a mobile application using a QR Code, thus ensuring flexibility and reliability of services anywhere and anytime. Throughout 2024, this service has made a significant contribution in supporting the growth of BNI's digital transactions while strengthening BNI's position as a trusted partner in corporate banking solutions.

4. BNIdirect API

BNIdirect API provides a digital solution for corporate customers to integrate directly with BNI banking services easily and safely. Through this service, customers or companies can integrate various financial transaction features directly into their internal systems, allowing banking transactions to be carried out directly through the company's platform. Currently, BNIdirect API has 280 of its services in this approved by the Financial Services Authority (OJK) and has implemented the National Payment API Standard (SNAP), which is an innovation standard to improve the security and reliability of payment systems in Indonesia.

BNI API services cover various transaction functions, such as disbursement, collection, payment, account information, and digital account opening. In addition, this API also supports non-financial features, such as the Know Your Customer (KYC) process and other account management. This support allows customers to accelerate business processes while increasing operational efficiency.

Through BNIdirect API, BNI partners will get step-by-step guidance, from registration to application testing in a sandbox environment. This portal is also equipped with comprehensive technical specifications, a designated page for reviewing sample errors, and tracking documentation changes, providing a seamless integration experience for partners.

BNI supports Customer businesses both domestically and overseas through API One Gate Payment (OGP), Lender Fund Account (RDL), Virtual Account (VA), and various other API services according to Customer business needs. This is reflected in the increase 0f 58.11% in the volume of BNIdirect API transactions in 2024 from the previous year.

BNIdirect for SME Clients

As a form of BNI's commitment to supporting digital transformation in the micro, small, and medium enterprises (MSMEs) sector, various new capabilities will soon be introduced through BNIdirect specifically for MSMEs. This platform is designed to facilitate MSME players in monitoring cash flow in real-time, manage liquidity better, meet other transaction needs, and present a fresher and

more modern appearance. This capability should provide a more personal experience and facilitate transactions for customers.

In supporting MSMEs to go global, BNIdirect comes with excellent features, such as fast international transfers, multi-currency management in one account, and integration with various other digital financial solutions.

The core value offered by BNI for MSME customers is: "Simplify Transaction, Personalized, and Comprehensive Financial Report."

1. **Simplify Transaction**
   BNIdirect allows MSME customers to run a more efficient daily transaction managements and skip the normally complicated process. This platform simplifies payment and receipt transactions, either through bank transfers, digital payments, or other payment systems, with better speed and security.
2. **Personalized**
   This service allows MSMEs to categorize and mark transactions by type, such as expenses for raw materials, salary payments, or other operational costs. This feature helps MSMEs monitor frequent transactions and pay special attention to areas that require more detailed management.
3. **Comprehensive Financial Report**
   MSMEs are given the convenience of compiling integrated financial reports, thus supporting faster and more accurate business decision making. This feature facilitates business planning, credit applications, and financial analysis. Customers can also monitor their financial position in real-time, including cash balances, receivables, and liabilities, which helps manage finances more effectively, drive business growth, and increase competitiveness.

BNIdirect Mobile

BNIdirect Mobile a complement to the website version of BNIdirect to facilitate customers making transactions via a smartphone. This application is available for Android and iOS operating systems, providing flexibility of access for customers with high mobility. With BNIdirect Mobile, customers can perform transactions instantly and practically, as well as monitor transaction activities in real-time anytime and anywhere.

This convenience is supported by advanced security features designed to ensure that every transaction is protected. The security system includes the use of M-PIN, hard token (BNI e-Secure), and soft token (mobile token) as transaction authorization tools. This combination of technologies not only provides maximum protection, but also ensures that the transaction process remains efficient and easy to use.

With this innovation, BNIdirect Mobile supports a faster, safer, and more convenient business experience, in line with customer needs in the dynamic digital era.

- BNIdirect Mobile Advantages
  a. Accessed via Android and iOS based devices.
  b. Display based on layer size.
  c. No need to carry tokens.
  d. Layered security.
  e. Auto update BNIdirect Mobile feature (no need to reinstall).
- BNIdirect Mobile Security
  a. Transaction authentication uses M-PIN and OTP sent to the User's mobile number registered with BNIdirect.
  b. Access to sensitive menus requires M-PIN.
  c. Data communication between the Device and the App server is AES 256 encrypted.
  d. Web Application Firewall (WAF) verification
- Terms and Conditions for Becoming a BNIdirect Mobile User Customer
  a. Already registered on the web version of the BNIDirect application.
  b. New customers can use the BNIdirect/ BNIDirect Mobile Registration Application by adding the BNIdirect Mobile feature and including the mobile/HP number for each user.
  c. Existing customers can use the BNIdirect/ BNIdirect Mobile Maintenance Application to add BNIdirect Mobile features and mobile/HP number for each user



Landing Page BNIdirect



BNIdirect Mobile

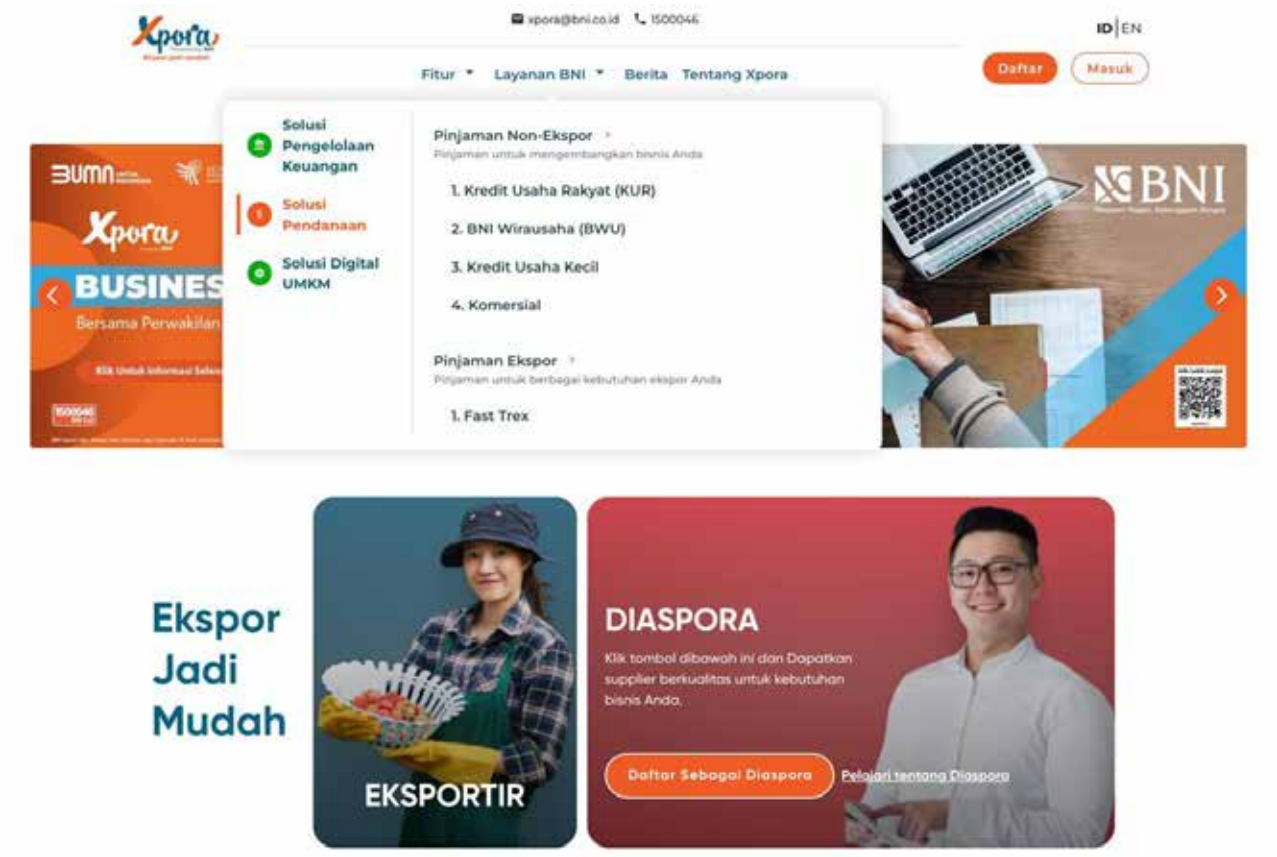


BNIdirect Performance

	2024	2023	Increase (Decrease)	
			Nominal	Percentage (%)
Transaction Volume (IDR-trillion)	7,931	6,433	1,498	23.3 ↑
Number of users	172,670	151,207	21,463	14.2 ↑

The 14.19% growth in the number of BNIdirect users in 2024 resulted in an increase of 23.3% its transaction volume. This reflects the high adoption and trust of customers in digital solutions offered by BNI to support efficiency and productivity in financial management.

BNI Xpora



In line with the development of Xpora as an export-oriented MSME ecosystem, BNI supports increasing the potential of Indonesian MSMEs as they develop their businesses towards MSME Go Productive, Go Digital, & Go Global while serving as a service center for Indonesian diaspora operating overseas. Related to Go Digital, the BNI Xpora portal, whose electronic address is www.xpora.bni.co.id, offers a range of recommendations for financial solutions and digital solutions in a comprehensive and integrated manner through appropriate business development depending on the level of experience of entrepreneurs through Business Level Checks, provides access to business insights through learning videos that can be followed through training and inspiration modules, brings export opportunities to the international market through Market Expansion (Business Matching) with the diaspora or global buyers, provides digital tools to support business activities through SME Tools, and offers various other services.

As of December 31, 2024, the BNI Xpora program has encouraged 43,089 MSME actors to reach the global market. From the Xpora service, the value of BNI's export credit distribution for MSMEs in 2024 reached IDR 33.61 trillion, and grew by 8.46% from the previous year.

BNI DPLK Sure





BNI DPLK SURE is an application to support the BNI DPLK business, and provides convenience and solutions for managing retirement planning for BNI DPLK customers. The BNI DPLK SURE services consist of account opening, deposits, claims, balance information, and fund management according to the investment package chosen by the customer. BNI DPLK SURE is also connected to BNI Mobile Banking, BNI ATM, and BNI Direct so that customers can make transactions anytime and anywhere. The BNI DPLK Investment Package consists of various products, including Deposits, Bonds, Mutual Funds, Sharia Mutual Funds, and others.

As well as the main services for customers, there are other modules in DPLK SURE, such as reconciliation, integration, daily accrual modules, reporting modules to regulators and operational monitoring, which strengthen the reliability of DPLK SURE, while still meeting the requirements of regulators.

Since 2021, DPLK BNI has become a market leader in the pension fund management industry in Indonesia since 2001. As of December 31, 2024, DPLK BNI's AUM (Asset Under Management) reached ID33.3 trillion for a total of more than 900 thousand corporate and individual customers.

Trade Finance Overseas

One of BNI's flagship businesses which is currently still being developed is Trade Finance to support BNI's mission, namely Strengthening International Services to Support the Needs of Global Business Partners. To achieve this, BNI continues to improve the performance of its Trade Finance application. To adopt the SWIFT Changes in 2023, which impacted trade transaction processing, in 2024 BNI upgraded the Trade Finance (TiPlus) application in overseas branches (KCLN) Singapore and Hong Kong. The SWIFT format update was also one of BNI's efforts to fulfill compliance aspects with the latest regulations.

Contribution of Digital Banking to BNI's Financial Performance

The variety of digital banking products and services developed by BNI not only strengthens BNI's image as one of the largest banks in Indonesia, but also has a positive impact on BNI's overall financial performance. In the form of increasing the Current Account Saving Account (CASA) and obtaining Fee Based Income.

BNI's total CASA in December 2024 reached IDR563.3 trillion. This achievement is also supported by BNI's success in increasing digital capabilities which were able to increase customer engagement and transaction experience.

The following is the contribution of digital banking products and services developed by BNI to achieving Fee Based Income:

	2024		2023		Increase (Decrease)		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	
ATM & e-channel	1,549	61.5	1,466	69.6	83	5.7	↑
Payment Point Online Banking (PPOB) & Bill Payment	383	15.2	311	14.8	72	23.1	↑
Wholesale Digital Transaction Platform	587	23.3	321	15.3	266	82.9	↑
Total	**2,519**	**100.0**	**2,098**	**100.0**	**421**	**20.1**	↑

In 2024, total Fee Based Income from digital services reached IDR2.5 trillion. Fees from ATMs & e-channels decreased, influenced by the implementation of the national payment system (BI Fast) which has lower transaction rates. Currently, more than 90% of interbank transfer transactions carried out by BNI customers have been carried out via BI Fast. This is a form of BNI's support for the government's program in integrating the national payment system.

Fees from PPOB & Bill Payment in 2024 increased by 23.1% compared to last year. Meanwhile, fees from the Wholesale Digital Transactional Platform increased by 82.9% compared to 2023, reflected in the value of transactions through BNIdirect which increased 23.3% Year on Year.

It indicates the success of BNI's strategy in increasing digital transactions by customers so that BNI digital services, especially Mobile Banking in the Retail Segment and BNIdirect in the Business Banking Segment, have also been used for transactions other than sending money.

Comprehensive Financial Review

PRESENTATION AND COMPLIANCE WITH ACCOUNTING STANDARDS APPLICABLE IN INDONESIA

The following discussion of the financial performance review is taken from the Consolidated Financial Statements of PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries prepared by Bank management in accordance with Indonesian Financial Accounting Standards. BNI's Consolidated Financial Statements as of the date and for the years ended December 31, 2024, 2023, and 2022 have been audited by KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner and a member firm of the PricewaterhouseCoopers network) with the partner in charge being Jimmy Pangestu, S.E., CPA (2023 and 2022: Drs. M. Jusuf Wibisana, M.Ec., CPA), an independent auditor, based on Audit Standards established by the Indonesian Institute of Public Accountants, with opinions without modification, as stated in their respective reports dated January 22, 2025, January 25, 2024, and January 20, 2023. Since the consolidated financial information above is taken from the Audited Consolidated Financial Statements, thus the information is not a complete presentation of the Audited Consolidated Financial Statements. The presentation of values for the accounts described in this report represents the net value after deducting allowances for impairment losses, unless otherwise stated.

The audited Annual Financial Report is released in less than 60 days from the end of the financial year, on January 22, 2025. [ACGS (B) C.1.1]

FINANCIAL PERFORMANCE ANALYSIS

Consolidated Statements of Financial Position

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Assets	1,129,806	1,086,664	1,029,837	43,142	4.0	↑	56,827	5.5	↑
Liabilities	962,619	931,931	889,639	30,688	3.3	↑	42,292	4.8	↑
Equity	167,187	154,733	140,198	12,454	8.1	↑	14,535	10.4	↑

ASSETS

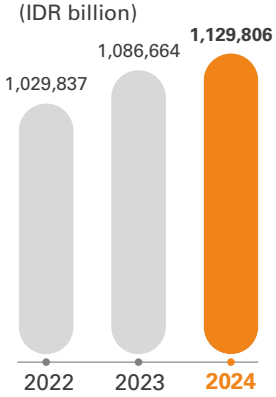
In 2024, total assets reached IDR1,130 trillion, grew by IDR43.1 trillion or 4.0% compared to the achievement in 2023. BNI's Total Asset growth was driven by Financial and Non-Financial Assets.

Financial Assets in 2024 reached IDR1,076 trillion, up 3.9% on an annual basis, mainly derived from the growth of Loans Distributed that contributed 68.7% to Total Assets in 2024 from 64.0% in the previous year. This reflects BNI's main business as a lender.

On the other hand, the other largest contribution from productive assets was Government Bonds, which amounted to 11.7% of Total Assets, which increased by 3.9% from IDR127.1 trillion in 2023 to IDR132.1 trillion in 2024.

Meanwhile, Non-Financial Assets grew by 6.3% to IDR53.8 trillion in 2024. The largest contributor was Fixed Assets and Right of Use Assets (Net) of IDR30.4 trillion, which grew 9.5% on an annualized basis.

Total Assets
(IDR billion)



Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Financial Assets							
Cash	13,710	11,207	13,448	2,503	22.3 ↑	(2,241)	(16.7) ↓
Current accounts with Bank Indonesia	51,669	65,256	82,922	(13,587)	(20.8) ↓	(17,666)	(21.3) ↓
Current accounts with other banks - Net	22,074	35,023	15,922	(12,949)	(37.0) ↓	19,101	120.0 ↑
Placements with other banks and Bank Indonesia - Net	17,076	43,794	51,569	(26,718)	(61.0) ↓	(7,775)	(15.1) ↓
Marketable securities - Net	48,534	37,165	28,556	11,369	30.6 ↑	8,609	30.1 ↑
Securities purchased under agreements to resell - Net	7,972	13,951	16,631	(5,979)	(42.9) ↓	(2,680)	(16.1) ↓
Bills and other receivables - Net	13,243	18,999	20,729	(5,756)	(30.3) ↓	(1,730)	(8.3) ↓
Acceptance Receivables - Net	15,926	17,091	18,912	(1,165)	(6.8) ↓	(1,821)	(9.6) ↓
Derivative Receivables	1,793	996	685	797	80.0 ↑	311	45.4 ↑
Loans disbursed	775,872	695,085	646,188	80,787	11.6 ↑	48,897	7.6 ↑
CKPN Loans disbursed	(38,685)	(47,158)	(50,334)	8,473	(18.0) ↓	3,176	(6.3) ↓
Government Bonds - Net	132,069	127,099	121,291	4,970	3.9 ↑	5,808	4.8 ↓
Equity Investments - Net	637	564	609	73	12.9 ↑	(45)	(7.4) ↓
Other Assets- Net	14,107	16,972	13,856	(2,865)	(16.9) ↓	3,116	22.5 ↑
Total Financial Assets	**1,075,997**	**1,036,044**	**980,984**	**39,953**	**3.9 ↑**	**55,060**	**5.6 ↑**

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Non Financial Assets							
Prepaid Taxes	19	643	644	(624)	(97.0) ↓	(1)	(0.2) ↓
Prepaid Expenses	2,941	2,743	3,244	198	7.2 ↑	(501)	(15.4) ↓
Investments in Associates	12,748	11,284	10,049	1,464	13.0 ↑	1,235	12.3 ↑
Fixed Assets - Net	30,408	27,765	26,549	2,643	9.5 ↑	1,216	4.6 ↑
Intangible assets	743	744	753	(1)	(0.1) ↓	(9)	(1.2) ↓
Deferred Tax Assets - Net	6,950	7,441	7,614	(491)	(6.6) ↓	(173)	(2.3) ↓
Total Non-Financial Assets	**53,809**	**50,620**	**48,853**	**3,189**	**6.3 ↑**	**1,767**	**3.6 ↑**
Total Assets	**1,129,806**	**1,086,664**	**1,029,837**	**43,142**	**4.0 ↑**	**56,827**	**5.5 ↑**

Cash

In 2024, BNI recorded cash of IDR13.7 trillion, an increase of 22.3% compared to the position in 2023 of IDR11.2 trillion. There was an increase in cash in Rupiah of 21.4% to IDR2.2 trillion in 2024. Cash in foreign currencies experienced an increase and was dominated by USD. The portion of cash in Rupiah remained dominant at 92.0% of BNI's total cash.

Current accounts with Bank Indonesia

BNI and its Subsidiaries are required to keep Minimum Statutory Reserve (MSR) in Rupiah for their activities as commercial and sharia banks, as well as an MSR in foreign currency for their activities when conducting foreign currency transactions.

Account	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Rupiah	43,717	84,6	57,795	88,6	76,037	91,7	(14,078)	(24.4) ↓	(18,242)	(24.0) ↓
US Dollar	7,952	15,4	7,461	11,4	6,885	8,3	491	6.6 ↑	576	8.4 ↑
Total	**51,669**	**100,0**	**65,256**	**100,0**	**82,922**	**100,0**	**(13,587)**	**(20.8) ↓**	**(17,666)**	**(21.3) ↓**

In 2024, BNI recorded Current Accounts with Bank Indonesia (BI) of IDR51.7 trillion, a decrease of 20.8% compared to IDR65.3 trillion in the previous year. This decrease corresponds to Bank Indonesia's incentive of relaxed obligation to fulfill the reserve requirement in rupiah to banks that channel credit or financing to certain priority sectors selected by Bank Indonesia.

Minimum Statutory Reserves (GWM)	2024 (%)	2023 (%)	2022 (%)
GWM - Rupiah	6.5	9.5	11.9
GWM - Foreign Currencies	4.0	4.0	4.0

BNI's primary MSR ratio for Rupiah was 6.5% as of December 31, 2024, and 9.5% as of December 31, 2023, whereas for foreign currency, they were 4.0% and 4.0%, respectively. The decrease in primary MSR was due to BNI receiving incentives this year in the form of a 2.6% relaxation of the statutory reserves in Rupiah from Bank Indonesia, as stated in its macroprudential liquidity policy. By utilizing this incentive, banks obtain additional liquidity which can be optimized to increase lending to the public and is reflected in BNI's credit growth in 2024 growing at a healthy 11.6% on an annual basis with an LDR ratio of 96.1%.

Current accounts with Other Banks

Account	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Rupiah	192	0.9	602	1.7	385	2.4	(410)	(68.1) ↓	217	56.4 ↑
Foreign Currencies	21,882	99.1	34,421	98.3	15,537	97.6	(12,539)	(36.4) ↓	18.884	121.5 ↑
Allowance for impairment losses	-	-	-	-	-	-	-	-	-	- -
Total – Net	**22,074**	**100.0**	**35,023**	**100.0**	**15,922**	**100.0**	**(12,949)**	**(37.0) ↓**	**19.101**	**120.0 ↑**

Current accounts with other banks in 2024 reached IDR22.1 trillion with current collectibility delining by 37.0% IDR35.0 trillion in 2023. The decrease was mainly in forex-denominated Current Accounts with Other Banks that reached IDR12.5 trillion, down 36.4% compared to the previous year's position. This was influenced by operational activities with counterparty banks in order to optimize liquidity. The contribution of this account to Total Assets was 2.0% in 2024, an increase compared to the previous year's portion of 3.2%.

Placements with Other Banks and Bank Indonesia

Account	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (Rp-billion)	Percentage (%)
Deposit Facility	10,125	59.3	39,429	90.0	49,389	95.8	(29,304)	(74.3) ↓	(9.960)	(20.2) ↓
Call money	3,142	18.4	1,364	3.1	911	1.8	1.778	130.4 ↑	453	49.7 ↑
Time Deposits	3,809	22.3	2,963	6.8	1,269	2.5	846	28.6 ↑	1.694	133.5 ↑
Negotiable Certificate Deposits	-	-	38	0.1	-	-	(38)	(100) ↓	38	100.0 ↑
Allowance for impairment losses	-	-	-	-	-	-	-	-	-	- -
Total - Net	**17,076**	**100.0**	**43,794**	**100.0**	**51,569**	**100.0**	**(26.718)**	**(61.0) ↓**	**(7.775)**	**(15.1) ↓**

Placements with other banks and Bank Indonesia were recorded at IDR17.1 trillion, or a decrease of 61.0% from the previous year. This decrease was due to BNI's focus on increasing productive assets that have higher yields, such as loans. The annual interest rate for this account in Rupiah was 0.0-7.0% and 0.0-7.3%, respectively, while for foreign currency (USD), it was 2.0-5.2% and 0.0%-5.7% for 2024 and 2023.

Securities

Securities are one of the alternative fund placements carried out by BNI, other than loans. In addition to earning interest income from investing in these securities, BNI also earns non-interest income from sales transactions and mark to market on these securities. As of December 31, 2024, the Bank recorded total securities of IDR48.5 trillion, an increase of 30.6% compared to the previous year's achievement of IDR37.2 trillion. The composition of securities owned by BNI is as follows:

Securities by Type

Securities	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Mutual funds	21,721	44.8	24,199	64.7	19,350	67.2	13,169	(10.2) ↓	4,849	25.1 ↑
Bonds	6,782	14.0	7,348	19.6	7,021	24.4	(566)	(7.7) ↓	327	4.7 ↑
Subordinated Bonds	352	0.7	607	1.6	604	2.1	(255)	(42.0) ↓	3	0.5 ↑
Bank Indonesia Certificates	-	-	-	-	78	0.3	-	-	(78)	(100.0) ↓
Bank Indonesia Rupiah Certificates (SRBI)	18,496	5.9	3,700	9.9	-	-	(851)	399.9 ↑	3,700	100.0 ↑
Bank Indonesia Foreign Currency Certificates (SVBI)	-	-	76	0.2	-	-	(76)	(100.0) ↓	76	100.0 ↑
Other Securities	1,183	2.4	1,478	4.0	1,750	6.1	(295)	(19.9) ↓	(272)	(15.5) ↓
Allowance for impairment losses	(0,3)	(0.0)	(243)		(247)		243	(99.9) ↓	4	(1.6) ↓
Total - Net	**48,534**	**100.0**	**37,165**	**100.0**	**28,556**	**100.0**	**11,369**	**30.6 ↑**	**8,609**	**30.1 ↑**

Securities by Type and Classification of Financial Assets

Securities	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Fair Value through Profit and Loss Statements										
Mutual Funds	2,885	5.9	4,745	12.7	5,425	18.8	(1,860)	(39.2) ↓	(680)	(12.5) ↓
Bank Indonesia Rupiah Certificates (SRBI)	18,496	38.1	2,549	6.8	-	-	15,947	625.6 ↑	2,549	100.0 ↑
Bank Indonesia Foreign Currency Certificates (SVBI)	-	-	76	0.2	-	-	(76)	(100.0) ↓	76	100.0 ↑
Bonds	1,297	2.7	642	1.7	3	-	655	102.0 ↑	639	21.300.0 ↑
Subordinated Bonds	122	0.3	269	0.7	6	-	(147)	(54.6) ↓	263	4.383.0 ↑
Other Securities	1,160	2.4	1	0.0	1,742	6.0	1,159	115.800.3 ↑	(1,741)	(99.9) ↓
Total Fair Value Through Profit and Loss Statement	**23,959**	**49.4**	**8,282**	**22.1**	**7,176**	**24.9**	**15,678**	**189.3 ↑**	**1,106**	**15.4**
Fair Value through Other Comprehensive Income										
SBI	-	-	-	-	78	0.3	-	-	(78)	(100.0) ↓
Mutual Funds	18,836	38.8	19,454	52.0	13,926	48.3	(618)	(3.2) ↓	5,528	39.7 ↑
Other Bonds	5,121	10.6	6,101	16.3	6,303	21.9	(980)	(16.1) ↓	(202)	(3.2) ↓
Subordinated Bonds	231	0.5	338	0.9	597	2.1	(107)	(31.7) ↓	(259)	(43.4) ↓

Securities	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Bank Indonesia Rupiah Certificates (SRBI)	-	-	1,151	3.1	-	-	(1,151)	(100.0) ↓	1,151	100.0 ↑
Other Securities	-	-	1,477	3.9	-	-	(1,477)	(100.0) ↓	1,477	100.0 ↑
Asset Backed Securities	-	-	-	-	-	-	-	-	-	-
Total Fair Value through Other Comprehensive Income	**24,188**	**49.8**	**28,521**	**76.2**	**20,904**	**72.6**	**(4,333)**	**(15.2)** ↓	**7,617**	**36.4** ↑
Amortized Acquisition Cost										
Other Bonds	364	0.7	605	1.6	716	2.5	(241)	(39.8) ↓	(111)	(15.5) ↓
Other Securities	23	0.0	-	-	7	-	23	100.0 ↑	(7)	(100.0) ↓
Total Amortized Acquisition Cost	387	0.8	605	1.6	723	2.5	(218)	(36.0) ↓	(118)	(16.3) ↓
Allowance for Impairment Losses	(0,3)		(243)			(247)	243	(99.9) ↓	4	(1.6) ↓
Total - Net	**48,534**	**100.0**	**37,165**	**100.0**	**28,556**	**100.0**	**11,369**	**30.6** ↑	**8,609**	**30.1** ↑

In 2024, the growth in securities owned by BNI was 30.6% or IDR11.4 trillion. This increase was mainly contributed by an increase in securities with type of instrument newly issued by Bank Indonesia in 2024, namely Bank Indonesia Rupiah Securities (SRBI) resulting in a total portfolio of IDR18.5 trillion.

Securities Based on Issuer	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Corporate	27,993	57.7	30,646	81.9	25,352	88.0	(2,653)	(8.7) ↓	5,294	20.9 ↑
Banks	2,045	4.2	2,986	8.0	3,373	11.7	(941)	(31.5) ↓	(387)	(11.5) ↓
Bank Indonesia	18,496	38.1	3,776	10.1	78	0.3	14,720	389.8 ↑	3,698	4.741.0 ↑
Sub Total	48,535	100.0	37,408	100.0	28,803	100.0	11,126	29.7 ↑	8,605	29.9 ↑
Allowance for Impairment Losses	(0,3)		(243)		(247)		243	(99.9) ↓	4	(1.6) ↓
Total - Net	**48,534**		**37,165**		**28,556**		**11,369**	**30.6** ↑	**8,609**	**30.1** ↑

Looking at the composition of the issuers of these securities, securities issued by corporations had the largest portion reaching 57.7% or IDR28.0 trillion in 2024, a decrease of IDR30.6 trillion (gross) compared to the previous year.

Viewed from collectability perspective, most of BNI's securities were in the current category with portions of 99.3% and 98.6% for the period ending December 31, 2024 and 2023, respectively. Management assesses

that the amount of allowance for impairment losses on securities owned by the Bank is adequate.

Securities Purchased under Agreements to Resell

As of December 31, 2024, Securities Purchased under Agreements to Resell amounted to IDR8.0 trillion, with the current classification decreasing by 42.9% compared to IDR14.0 trillion last year. The biggest decline was with Bank Indonesia counterparties, where the decline in Reverse Repo amounted to IDR12.5 trillion. The contractual interest rates for Securities Purchased under Agreements to Resell as of December 31, 2024, and December 31, 2023, were 6.5%-6.8% and 6.0%-6.7%, respectively.

Export Bills and Other Receivables

In 2024, BNI recorded export bills and other receivables worth IDR13.2 trillion, a decrease of 30.3% from IDR19.0 trillion in 2023.This decrease was mainly due to a decline in export bills transactions in foreign exchange of IDR2.8 trillion, or 21.7%, where the total export bills transactions in 2024 reached IDR10 trillion, from IDR12.7 trillion in the previous year. Export bills and other receivables in Rupiah made up a dominant portion of the BNI export bills and other receivables composition, with portions of 74.8% and 65.9% for 2024 and 2023, respectively. Export bills and other receivables are in the form of Domestic Documented Certificates (SKBDN), export bills, open account financing, and supply chain financing.

Acceptance Receivables

Based on the beneficiary, BNI acceptance receivables are divided into non-bank and bank debtors. In 2024, BNI acceptance receivables reached IDR15.9 trillion, a decrease of 6.8% compared to IDR17.1 trillion the previous period. This decrease was mainly influenced by a decrease in acceptance receivables from customers in foreign exchange from non-bank debtors of IDR1.6 trillion (gross) in 2024. By Financial Service Authority (OJK) Rule Collectibility, all Acceptance Receivables are classified as current, with a provision for impairment losses that have been established in accordance with applicable regulations. Management believes that the amount of allowance for impairment losses established is adequate.

Derivative Receivables

In conducting business, BNI transacts in derivative financial instruments such as foreign currency futures contracts, foreign currency swaps, interest rate swaps, and spot transactions for financing, trading, and hedging. The instruments used by BNI are classified based on the type of risk related to exchange rates, interest rates, or both. Based on the exchange rate, derivative receivables are in the form of buy/sell forward contracts, buy/sell foreign currency swaps, buy/sell foreign currency spots, and buy/sell foreign currency options. Instruments related to interest rates are swaps on interest rates, while instruments related to exchange rates and interest rates are foreign currency swaps and US Dollar interest rates.

Cumulatively, BNI derivative receivables amounted to IDR1.8 trillion in 2024, an increase of 80.0% from the achievement in 2023 of IDR1 trillion. Of the total derivative receivables, foreign currency swap instruments in US Dollars recorded the largest nominal value of USD1.5 billion in 2024 from USD1.3 billion in 2023. All derivative receivables as of December 31, 2024, were classified as current.

Loans Disbursed

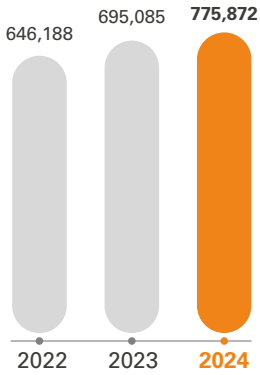
Loans disbursed are BNI's main business, with a contribution of 68.7% to Total Assets in 2024 and 64.0% in 2023. Based on the type of credit, BNI provides loans in the form of working capital loans, investment loans, consumer loans, syndicated loans, employee loans, and government program loans.

BNI's loans disbursed reached IDR775.9 trillion, growing 11.6% compared to the previous year of IDR695.1 trillion. The growth in loans provided was driven by Consumer Loans, which increased by 17.1%, or IDR21.1 trillion, where the current position was IDR144.5 trillion and the position in 2023 was IDR109.4 trillion. BNI loans are provided in Rupiah and foreign currency. Loans in Rupiah still have the largest portion, namely 78.8% (2024) and 80.9% (2023). Meanwhile, loans in foreign currency are dominated by US Dollars with a contribution of 20.4% and 18.6% to total loans in 2024 and 2023, respectively.

As of December 31, 2024, the prime lending rate was recorded at 8.8% for the corporate segment, 9.0% for the retail segment, 10.0%-11.9% for the MSME segment, 9.3% for home ownership loans (KPR), and 10.7% for consumer loans apart from KPR.

Total Loans Disbursed

(IDR billion)



Working capital loans made up the largest portion of BNI's loans portfolio (gross) at 51.5% and 50.8% in 2024 and 2023, respectively. Cumulatively, the loan portfolio was well diversified with contributions from other types, with a relatively large portion being investment loans (17%); consumer loans (18.6%); and syndicated loans (12.5%) in 2024. The composition of loans based on loan type is as follows:

Loans by Type	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Working Capital	399.771	51,5	352.886	50,8	350.624	54,3	46.885	13,8 ↑	2.262	0,7 ↑
Investment	131.623	17,0	117.616	16,9	133.840	20,7	14.007	11,9 ↑	(16.224)	(12,1) ↓
Consumer	144.460	18,6	123.317	17,7	109.424	16,9	21.143	17,1 ↑	13.893	12,7 ↑
Employee	2.894	0,4	3.635	0,5	4.151	0,6	(741)	(20,4) ↓	(516)	(12,4) ↓
Syndicated	97.121	12,5	97.600	14,0	48.079	7,4	(479)	(0,5) ↓	49.521	103,0 ↑
Government Programs	3	0,0	31	0,0	70	0,0	(28)	(91,5) ↓	(39)	(55,7) ↓
Total - Gross	775.872	100,0	695.085	100,0	646.188	100,0	80.787	11,6 ↑	48.897	7,6 ↑
Allowance for Impairment Losses	(38.685)		(47.158)		(50.334)		8.474	(18) ↓	3.176	(6,3) ↓
Total - Net	**737.187**		**647.927**		**595.854**		**89.261**	**13,8** ↑	**52.073**	**8,7** ↑

Regarding syndicated loans, BNI's participation in syndicated loans with other banks amounted to IDR97.1 trillion and IDR97.6 trillion as of December 31, 2024 and 2023, respectively. Syndicated loans are loans provided to debtors based on joint financing agreements with other banks. The percentage of BNI's share in syndicated loans, where BNI acts as the syndication leader, is 5.0%-100.0% in 2024 and 5.0%-100.0% in 2023.

Employee loans are loans given to BNI employees with an interest rate of 0%-5% per year intended for home purchases and other purposes with a term ranging from 1 year to 20 years. Loan principal and interest payments are paid through monthly salary deductions. The Government Credit Program consists of Food Security Credit (KKP) Two Steps Loan (TSL), Cattle Breeding Business Credit (KUPS), and Plantation Revitalization which can be partially and/or fully funded by the Government.

Loans by Type	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Corporate	**365,945**	**47.2**	**317,592**	**45.7**	**255,639**	**39.6**	**48,353**	**15.2**	**61,963**	**24.2**
Rupiah	287,996	37.1	252,995	36.4	207,969	32.2	35,001	13.8	45,026	21.7
Foreign Currency	77,949	10.0	64,597	9.3	47,670	7.4	13,352	20.7	16,927	35.5
Middle	**100,422**	**12.9**	**102,460**	**14.7**	**112,462**	**17.4**	**(2,038)**	**(19.9)**	**(10,002)**	**(8.9)**
Rupiah	89,175	11.5	91,224	13.1	99,092	15.3	(2,049)	(2.2)	(7,868)	(7.9)
Foreign Currency	11,247	1.4	11,236	1.6	13,370	2.1	11	0.1	(2,134)	(16.0)

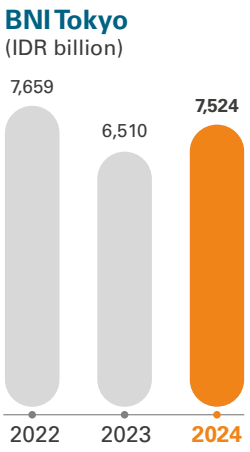
Loans by Type	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Small	**75,752**	**9.8**	**84,892**	**12.2**	**97,210**	**15.0**	**(9,140)**	**(10.8)**	**(12,318)**	**(12.7)**
Rupiah	75,747	9.8	84,876	12.2	97,115	15.0	(9,129)	(10.8)	(12,239)	(12.6)
Foreign Currency	5	0.0	16	0.0	95	0.0	(11)	(68.8)	(79)	(83.2)
Consumer	**142,492**	**18.4**	**124,487**	**17.9**	**109,602**	**17.0**	**18,005**	**14.5**	**14,885**	**13.6**
Rupiah	142,469	18.4	124,463	17.9	109,577	17.0	18,006	14.5	14,886	13.6
Foreign Currency	23	0.0	24	0.0	25	0.0	(1)	(4.2)	(1)	(4.0)
Overseas	**75,014**	**9.7**	**56,611**	**8.1**	**67,405**	**10.4**	**18,043**	**32.5**	**(10,794)**	**(16.0)**
Rupiah	-	-	-	-	-	-	-	-	-	-
Foreign Currency	75,014	9.7	56,611	8.1	67,405	10.4	18,043	32.5	(10,794)	(16.0)
Subsidiaries	**16,247**	**2.1**	**9,043**	**1.3**	**3,870**	**0.6**	**7,204**	**79.7**	**5,173**	**133.7**
Rupiah	16,197	2.1	9,033	1.3	3,834	0.6	7,165	79.3	5,199	135.6
Foreign Currency	50	0.0	10	0.0	36	0.0	40	400.0	(27)	(73.0)
Total Loans	**775,872**	**100.0**	**695,085**	**100.0**	**646,188**	**100.0**	**80,787**	**11.6**	**48,897**	**7.6**
Total Rupiah	**611,584**	**78.8**	**562,591**	**80.9**	**517,587**	**80.1**	**48,993**	**8.7**	**45,004**	**8.7**
Total Foreign Currency	**164.288**	**21.2**	**132.494**	**19.1**	**128.601**	**19.9**	**31.794**	**24.0**	**3.893**	**3.0**

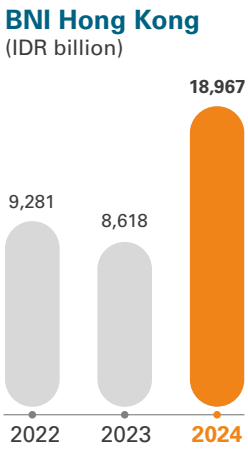
Loan by Economic Sector	2024		2023		2022		Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Trade, restaurants and hotels	125,412	16.2	130,427	18.8	109,753	17.0	(5,015)	(3.8)	↓	20,674	18.8	↑
Industry	159,581	20.6	137,662	19.8	133,896	20.7	21,919	15.9	↑	3,766	2.8	↑
Agriculture	48,890	6.3	56,438	8.1	57,131	8.8	(7,548)	(13.4)	↓	(693)	(1.2)	↓
Business services	52,323	6.7	47,189	6.8	47,153	7.3	5,134	10.9	↑	36	0.1	↑
Construction	60,442	7.8	54,444	7.8	55,865	8.6	5,998	11.0	↑	(1,421)	(2.5)	↓
Transport, warehousing and communication	57,825	7.5	49,271	7.1	44,962	7.0	8,554	17.4	↑	4,309	9.6	↑
Electricity, gas and water	31,643	4.1	21,541	3.1	22,073	3.4	10,102	46.9	↑	(532)	(2.4)	↓
Social services	40,740	5.3	14,431	2.1	23,240	3.6	26,309	182.3	↑	(8,809)	(37.9)	↓
Mining	51,660	6.7	48,943	7.0	39,063	6.0	2,717	5.6	↑	9,880	25.3	↑
Others	147,356	19.0	134,739	19.4	113,052	17.5	12,617	9.4	↑	21,687	19.2	↑
Sub Total	775,872	100.0	695,085	100.0	646,188	100.0	80,787	11.6	↑	48,897	7.6	↑
Allowance for Impairment Losses	(38,685)		(47,158)		(50,334)		(8,473)	(18.0)	↓	3,176	(6.3)	↓
Total - Net	**737,187**		**647,927**		**595,854**		**89,260**	**13.8**	↑	**52,073**	**8.7**	↑

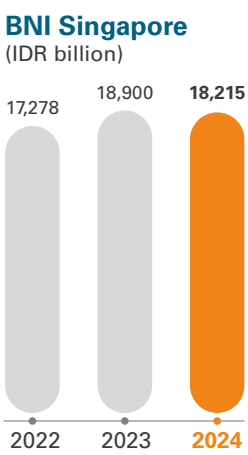
From the economic sector perception, loans disbursed by BNI are well diversified; therefore, they are not exposed to the risk of loan concentration in certain economic sectors. The three economic sectors that have the highest contribution to loans disbursed in 2024 are the industrial or manufacturing sector with a share of 20.6%; trade, restaurants, and hotels (16.2%); and agriculture (6.3%). In the previous year, the portion of loans distribution for the three sectors remained relatively unchanged at 19.8%; 18.8%; and 7.8%, respectively.

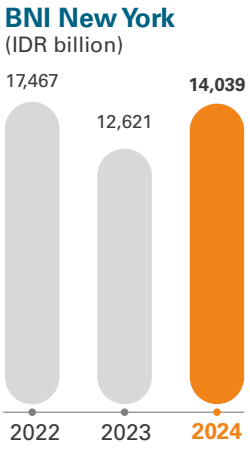
Loans Disbursed by Overseas Offices	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
BNI Tokyo	7,524	10.0	6,510	11.5	7,659	11.4	1,014	15.6 ↑	(1,149)	(15.0) ↓
BNI Hong Kong	18,967	25.3	8,618	15.2	9,281	13.8	10,349	120.1 ↑	(663)	(7.1) ↓
BNI Singapore	18,215	24.3	18,900	33.4	17,278	25.6	(685)	(3.6) ↓	1,622	9.4 ↑
BNI New York	14,039	18.7	12,621	22.3	17,467	25.9	1,418	11.2 ↑	(4,846)	(27.7) ↓
BNI London	13,137	17.5	7,531	13.3	13,161	19.5	5,606	74.4 ↑	(5,630)	(42.8) ↓
BNI Seoul	3,132	4.2	2,431	4.3	2,559	3.8	701	28.8 ↓	(128)	(5.0) ↓
Total	**75,014**	**100.0**	**56,611**	**100.0**	**67,405**	**100.0**	**18,403**	**32.5 ↑**	**(10,794)**	**(16.0) ↓**

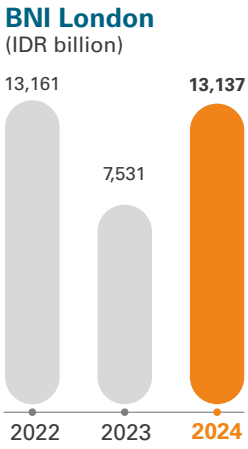
Based on disbursement by Overseas Branches (KLN), loans at BNI Overseas Branches increased by IDR18.4 trillion, or 32.5%, compared to the previous year. The increase in loans disbursement by Overseas Branches was dominated by BNI Hong Kong and BNI England, respectively amounting to IDR10.3 trillion and IDR5.6 trillion, or increased by 120.1% and 74.4% compared to the previous year.

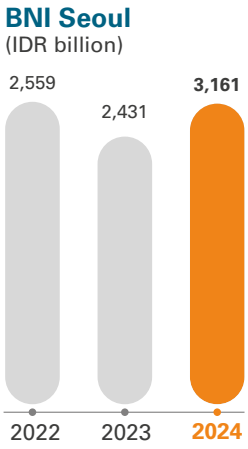












Loan Collectibility	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Current	731,053	94.2	646,349	93.0	605,232	93.7	84,704	13.1 ↑	41,117	6.8 ↑
Special Mention	29,566	3.8	33,901	4.9	22,795	3.5	(4,335)	(12.8) ↓	11,106	48.7 ↑
Substandard	3,838	0.5	2,954	0.4	3,123	0.5	884	30 ↑	(169)	(5.4) ↓
Doubtful	2,138	0.3	2,822	0.4	1,471	0.2	(684)	(24.2) ↓	1,351	91.8 ↑
Loss	9,277	1.2	9,059	1.3	13,567	2.1	218	2.4 ↑	(4,508)	(33.2) ↓
Sub Total	775,872	100.0	695,085	100.0	646,188	100.0	80,787	11.6 ↑	48,897	7.6 ↑
Allowance for Impairment Losses	(38,685)		(47,158)		(50,334)		8,473	(18.0) ↓	3,176	(6.3) ↓
Total - Net	**737,187**		**647,927**		**595,854**		**89,260**	**13.8** ↑	**52,073**	**8.7** ↑

In terms of Bank Indonesia collectibility in accordance with OJK Regulations, the collectibility of loans disbursed by BNI was mostly in the current category, with a portion of 94.2% and 93.0% for 2024 and 2023, respectively. The gross non-performing loan ratio (before deducting allowance for impairment losses) for BNI and Subsidiaries as of December 31, 2024, and 2023 was 2.0% and 2.1%, respectively. BNI Consolidated's net non-performing loan ratio for the same periods reached 0.7% and 0.6%.

Write-off of Loan Assets and Recovery – Bank Only

In 2024, BNI wrote off loan assets amounting to IDR18.7 trillion, higher than in 2023 of IDR14.3 trillion. In its implementation, BNI Management prioritizes debtors who go bankrupt and have legal problems, where maximum efforts have been made. When compared with the total loans provided by the Bank Only, the loan assets write-off ratio is relatively low at around 2.4%. In 2024, the recovery of written-off loans amounted to IDR6.0 trillion with a recovery rate of 32.2%, a decrease compared to 35.9% in 2023.

Government Bonds

Government Bonds are financial instruments that fall under low-risk criteria but offer competitive interest rates. On the other hand, these instruments assist the Government in managing the APBN (State Budget).

Loan Collectibility	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Fair value through profit or loss	3,957	3.0	4,188	3.3	1,775	1.5	(231)	(5.5) ↓	2,413	135.9 ↑
Fair Value through Other Comprehensive Income	90,905	68.8	86,549	68.1	82,328	67.9	4,356	5.0 ↑	4,221	5.1 ↑
Amortized Expenses	37,210	28.2	36,363	28.6	37,189	30.6	847	2.3 ↑	(826)	(2.2) ↓
Total	**132,072**	**100.0**	**127,100**	**100.0**	**121,292**	**100.0**	**4,972**	**3.9** ↑	**5,808**	**4.8** ↑
Fixed interest rate	131,972	99.9	127,001	99.9	121,192	99.9	4,971	3.9 ↑	5,809	4.8 ↑
Floating interest rate	100	0.1	99	0.1	100	0.1	1	1.0 ↑	(1)	(1.0) ↓
Total	**132,072**	**100.0**	**127,100**	**100.0**	**121,292**	**100.0**	**4,972**	**3.9** ↑	**5,808**	**4.8** ↑

Government Bonds are financial instruments that fall under low-risk criteria but offer competitive interest rates. On the other hand, these instruments help the government fund the APBN (State Budget). As of December 31, 2024, BNI recorded Government Bonds amounting to IDR132.1 trillion, or an increase of 3.9% compared to the same position in 2023. BNI's Government Bonds are denominated in Rupiah and foreign currency. Government Bonds denominated in Rupiah reached IDR99.2 trillion, or an increase of 4.1% in 2024, compared to IDR95.3 trillion the previous year. Meanwhile, Government Bonds in foreign currencies amounted to IDR32.8 trillion and IDR31.8 trillion in 2024 and 2023, respectively. The contribution of this account to BNI's total assets in 2024 and 2023 was 11.7% and 11.7%, respectively.

Using the type of Government Bond interest rates, Government Bond transactions with fixed interest rates delivered a dominant portion of 99.9% in 2024 and 2023. Whereas for floating interest rate bonds, the portion of Government Bond transactions was 0.1% and 0.1% in 2024 and 2023.

For fixed interest rates, the market price of Government Bonds ranges between 81.0% and 129.3% and between 73.9% and 132.3% on December 31, 2024 and 2023, respectively. Meanwhile, the market price of Government Bonds with floating interest rates was 100.0% and 100.0% on December 31, 2024 and 2023.

In the Government Bond financial instruments, there are Government Bonds from the recapitalization program; the amount of recapitalization bonds on December 31, 2024, and December 31, 2023, was IDR100 billion each.

The contract interest rate for Government Bonds in 2024 for fixed interest rates was 4.9%-12.0% in Rupiah, 0.5-7.8% in US Dollars, and 0.5%-1.3% in Singapore Dollars. Meanwhile, the contract interest rate for fixed interest rates in the previous year for the three types of currencies was 3.9%-12.0%, 0.5%-7.8%, and 0.5%-1.3%. On the other hand, the annual floating interest rate for Government Bonds in 2024 was 6.0%, up from 4.5% in the previous year.

Prepaid Taxes and Prepaid Expenses

BNI posted prepaid taxes and expenses for the period ending December 31, 2024, amounting to IDR19 billion and IDR2.9 trillion, respectively. In the previous year, the two accounts reached IDR0.6 trillion and IDR2.7 trillion, respectively.

Equity Investments and Investments in Associates

	2024 (%)	2023 (%)	2022 (%)
PT Bursa Efek Indonesia	1.2	1.2	1.2
PT Kustodian Sentral Efek Indonesia	2.5	2.5	2.5
PT Pemeringkat Efek Indonesia	0.1	0.2	0.6
PT Bank Mizuho Indonesia	1	1.0	1.0
PT Bank SMBC Indonesia Tbk	0.1	0.2	0.2
PT PANN Pembiayaan Maritim	-	48.4	48.4
PT Fintek Karya Nusantara	9.8	9.8	9.3
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	17.5	17.5	17. 5
PT Bank Syariah Indonesia Tbk	23.2	23.2	23.2

In 2024, BNI's net equity investments and investments in associates reached IDR13.4 trillion, higher than the position in 2023 of IDR11.8 trillion due to additional participation and recognition of the profit portion of PT Bank Syariah Indonesia Tbk in 2024.

Other Assets

BNI's net Other Assets reached IDR14.1 trillion in 2024, a decrease of 16.9% compared to 2023's position of IDR17.0 trillion due to a decrease in several accounts, including receivables from transactions related to ATMs and credit cards and BI's Export Proceeds Foreign Exchange (DHE).

Fixed Assets

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Land	17,169	16,364	16,023	805	4.7 ↑	341	2.1 ↑
Building	9,970	9,246	8,724	724	7.3 ↑	522	6.0 ↑
Office Equipment and Motor Vehicles	16,300	15,187	13,958	1,113	6.8 ↑	1,229	8.8 ↑
Total Acquisition Cost	43,439	40,797	38,705	2,642	6.1 ↑	2,092	5.4 ↑
Assets in Settlement	2,267	1,239	707	1,028	45.3 ↑	532	75.2 ↑
Right-of-Use Assets	3,110	2,652	2,343	458	14.7 ↑	309	13.2 ↑
Total Acquisition Cost	48,816	44,688	41,755	4,128	8.5 ↑	2,933	7.0 ↑
Accumulated Depreciation							
Land	3,877	3,366	2,814	511	15.2 ↑	552	19.6 ↑
Office Equipment and Motor Vehicles	13,175	12,317	11,345	858	7.0 ↑	972	8.6 ↑
Right-of-Use Assets	1,356	1,240	1,047	116	9.4 ↑	193	18.4 ↑
Total Accumulated Depreciation	18,408	16,923	15,206	1,485	8.8 ↑	1,717	11.3 ↑
Net Book Value	30,408	27,765	26,549	2,643	9.5 ↑	1,216	4.6 ↑

In 2024, BNI posted net fixed assets of IDR30.4 trillion, an increase of 9.5% from IDR27.8 trillion in 2023. None of BNI's fixed assets were pledged. The right-of-use assets as of December 31, 2024, amounted to IDR1.7 trillion (net). In addition, management believes that there was no impairment in the value of fixed assets owned by BNI during the year, as management believes that the carrying value of fixed assets does not exceed the estimated value that can be recovered. The contribution of fixed assets (net) to BNI's total assets in 2024 and 2023 was 2.7% and 2.6%, respectively.

In 2024, the Bank has revaluated its fixed assets for land and buildings, in accordance with the provisions of the Decree of the Chairman of Bapepam (Capital Market and Financial Institution Supervisory Agency) No. KEP-347/BL/2012 dated June 25, 2012 concerning the Presentation and Disclosure in Financial Report of Issuer or Public Company, point 27.e, by considering the book value of fixed assets (land and buildings).

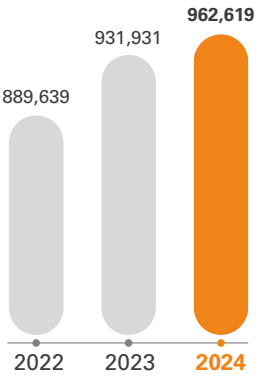
Deferred Tax Assets - Net

In 2024, BNI's Net Deferred Tax Assets amounted to IDR6.9 trillion. This achievement was lower than the previous year's position of IDR7.4 trillion, which was influenced by the provision of provisions for impairment losses on earning assets – other than loans.

LIABILITIES

In 2024, BNI's Liabilities grew by 3.3% to IDR963 trillion, mainly due to an increase in deposits from other banks, securities sold under agreements to repurchase, securities issued, and borrowings. BNI's Third Party Funds (DPK) decreased by 0.6% to IDR805.5 trillion in line with a decrease in Current Account Saving Account (CASA) of IDR14.2 trillion to IDR563.3 trillion, or a decrease of 2.5% from the previous year.

Total Liabilities
(IDR billion)



Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Financial Liabilities									
Obligations due immediately	5,515	5,295	4,686	220	4.2%	↑	609	13.0%	↑
Deposits from customers	805,511	810,730	769,269	(5,219)	-0.6%	↓	41,461	5.4%	↑
Deposits from other banks	18,548	11,894	15,245	6,654	55.9%	↑	(3,351)	-22.0%	↓
Derivative payables	1,479	810	775	669	82.6%	↑	35	4.5%	↑
Securities sold under agreements to repurchase	15,891	6,891	2,885	9,000	130.6%	↑	4,006	138.9%	↑
Acceptance payables	4,229	5,748	5,301	(1,519)	-26.4%	↓	447	8.4%	↑
Accrued expenses	1,529	1,664	1,441	(135)	-8.1%	↓	223	15.5%	↑
Other liabilities	26,564	26,125	21,130	439	1.7%	↑	4,995	23.6%	↑
Debt Securities	12,975	4,893	4,897	8,082	165.2%	↑	(4)	-0.1%	↓
Borrowings	42,931	30,950	35,654	11,981	38.7%	↑	(4,704)	-13.2%	↓
Subordinated Securities	17,699	16,929	17,213	770	4.5%	↑	(284)	-1.6%	↓
Total Financial Liabilities	**952,871**	**921,929**	**878,496**	**30,942**	**3.4%**	↑	**43,433**	**4.9%**	↑
Non-Financial Liabilities									
Taxes payable	318	823	1,551	(505)	-61.4%	↓	(728)	-46.9%	↓
Employee benefits	7,147	7,006	6,880	141	2.0%	↑	126	1.8%	↑
Provisions	2,283	2,173	2,712	110	5.1%	↑	(539)	-19.9%	↓
Total Non-Financial Liabilities	**9,748**	**10,002**	**11,143**	**(254)**	**-2.5%**	↓	**(1,141)**	**-10.2%**	↓
Total Liabilities	**962,619**	**931,931**	**889,639**	**30,688**	**3.3%**	↑	**42,292**	**4.8%**	↑

Financial Liabilities in 2024 increased by Rp30.9 trillion or 3.4% from the previous year, which was dominated by an increase of IDR12 trillion or 38.7% in Loans received, of Rp9.0 trillion or 130.6% in Securities sold under agreements to repurchase, and of IDR6.7 trillion or 55.9% in Deposits from other banks from the previous month.

Non-Financial Liabilities in 2024 decreased by IDR254 billion or 2.5% from the previous year, which was dominated by a decrease of IDR505 billion or 61.4%.in Tax Payables.

Obligations Due Immediately

BNI's Obligations due Immediately increased by IDR220 billion or 4.2% to IDR5.5 trillion compared to the previous position of IDR5.3 trillion. The increase was in line with an increase in temporary deposit transactions not yet settled of IDR543.2 billion and Trust Funds of IDR1.1 trillion compared to 2023. However, there was a decrease in BNI's obligation as issuer bank (ATM) in 2024 of IDR1.8 trillion.

Deposits from Customers

In 2024, BNI recorded total Third Party Funds (TPF) of IDR805.5 trillion amidst tight liquidity conditions in the banking industry. BNI's TPF portfolio was well diversified with a composition of Current Account Savings Accounts (CASA) of 69.9% or IDR563.3 trillion, while Time Deposits were 30.1% or IDR242.2 trillion in 2024.

This TPF achievement was mainly driven by savings, which were able to grow 11.0% compared to the previous year's achievement, for the amount of IDR257.4 trillion in 2024. Therefore, CASA Ratio could be maintained at 69.9% or IDR563.3 trillion. This increase in savings was in line with BNI's strategy to focus more on low-cost funding by increasing the capabilities of customer digital services through the launch of wondr by BNI on July 5, 2024.

Third Party Funds in the form of Deposits increased by IDR9.6 trillion, or 4.1%, from the previous year to IDR242.2 trillion in 2024.

From the currency side, BNI's Third Party Funds in Rupiah had a dominant portion of 79.6% and 78.2% in 2024 and 2023, in line with loan disbursement, which was also dominated in Rupiah. However, the portion of Third Party Funds in foreign currency was 20.4% and 21.8% in 2024 and 2023, respectively. Third Party Funds in foreign currency reached IDR164.0 trillion, with Third Party Funds in US Dollars having the dominant portion of IDR151.2 trillion in 2024 and IDR165.8 trillion in 2023.

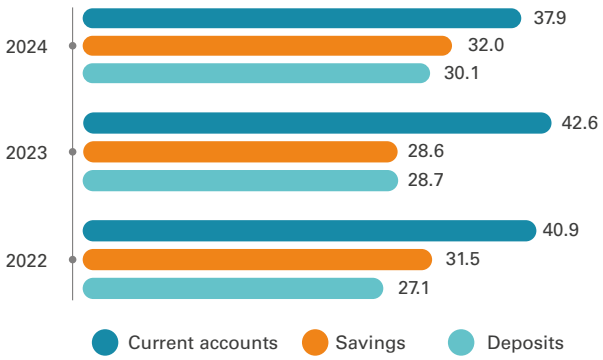
In 2024, the interest rate and annual profit sharing for Third Party Funds in Rupiah were 0.00%-8.10%; 0.0%-6.25% (US Dollar); 0.00%-2.25% (Singapore Dollar); 0.00%-0.10% (European Euro) and 0.00%-0.07% (Japanese Yen). While in the previous year, the interest rate and annual profit sharing for DPK in Rupiah were 0.00%-7.50%; 0.00%-6.90% (US Dollar); 0.00%-1.75% (Singapore Dollar); 0.00%-0.10% (European Euro) and 0.00% (Japanese Yen).

Total Customers Deposits
(IDR billion)



Deposits by Type	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Current Accounts	305,734	37.9	345,496	42.6	314,625	40.9	(39,762)	(11.5) ↓	30,871	9.8 ↑
Rupiah	192,231	23.8	203,157	25.1	211,972	27.6	(10,926)	(5.4) ↓	(8,815)	(4.2) ↓
Foreign Currency	113,503	14.1	142,339	17.6	102,653	13.3	(28,836)	(20.3) ↓	39,686	38.7 ↑
Savings	257,544	32.0	231,982	28.6	242,695	31.5	25,562	11.0 ↑	(10,713)	(4.4) ↓
Rupiah	247,370	30.7	222,513	27.4	230,379	29.9	24,857	11.2 ↑	(7,866)	(3.4) ↓
Foreign Currency	10,174	1.3	9,469	1.2	12,316	1.6	705	7.4 ↑	(2,847)	(23.1) ↓
Total Current accounts and Savings accounts	**563,278**	**69.9**	**577,478**	**71.2**	**557,320**	**72.4**	**(14,200)**	**(2.5) ↓**	**20,158**	**3.6 ↑**
Time deposits	242,233	30.1	232,664	28.7	208,798	27.1	9,569	4.1 ↑	23,866	11.4 ↑
Rupiah	201,908	25.1	208,275	25.7	185,146	24.1	(6,367)	(3.1) ↓	23,129	12.5 ↑
Foreign Currency	40,325	5.0	24,389	3.0	23,652	3.1	15,936	65.3 ↑	737	3.1 ↑
Negotiable Certificate of Deposit (NCD) issued	0	0	588	0.1	3,151	0.4	(588)	(100.0) ↓	(2,563)	(81.3) ↓
Rupiah	0	0	0	0	1,920	0.2	0	0	(1,920)	(100.0) ↓
Foreign Currency	0	0	588	0.1	1,231	0.2	(588)	(100.0) ↓	(643)	(52.2) ↓
Total Deposits from Customers	**805,511**	**100.0**	**810,730**	**100.0**	**769,269**	**100.0**	**(5,219)**	**(0.6) ↓**	**41,461**	**5.4 ↑**
Rupiah	641,509	79.6	633,945	78.2	629,417	81.8	7,564	1.2 ↑	4,529	0.7 ↑
Foreign Currency	164,002	20.4	176,785	21.8	139,852	18.2	(12,783)	(7.2) ↓	36,932	26.4 ↑

Composition of Customer Deposits
Percentage (%)



Deposits from Other Banks

Account	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Current accounts	3,725	20.1	4,376	36.8	4,206	27.6	(651)	(14.9) ↓	170	4.0 ↑
Time Deposits	832	4.5	804	6.8	903	5.9	28	3.5 ↑	(99)	(11.0) ↓
Other Deposits	926	5.0	1,080	9.1	1,173	7.7	(154)	(14.3) ↓	(93)	(7.9) ↓
Interbank Money Market	12,294	66.3	5,118	43.0	8,175	53.6	7,176	140.2 ↑	(3,057)	(37.4) ↓
Negotiable Certificate of Deposit (NCD)	771	4.2	516	4.3	788	5.2	255	49.4 ↑	(272)	(34.5) ↓
Total	**18,548**	**100.0**	**11,894**	**100.0**	**15,245**	**100.0**	**6,654**	**55.9 ↑**	**(3,351)**	**(22.0) ↓**

BNI's Deposits from Other Banks reached IDR18.5 trillion, an increase of 55.9% in 2024, compared to the position in 2023 of IDR11.9 trillion. The increase was due to the Interbank Money Market (PUAB) instruments of IDR12.3 trillion, an increase of IDR7.2 trillion, or 140.2%, compared to the position in 2023 of IDR5.1 trillion.

The interest rate and annual profit sharing for deposits from other banks in Rupiah in 2024 were 0.00%-6.90% (Rupiah); 0.00%-5.14% (US Dollar); 0.00%-0.77% (Japanese Yen); and 0.00%-3.28% (Singapore Dollar). For 2023, the interest rate and annual profit sharing for this account from the four currencies were 0.00%-6.70% (Rupiah); 0.00%-6.05% (US Dollar); 0.00%-0.45% (Japanese Yen); and 0.00%-4.20% (Singapore Dollar).

Derivative Payables

Account	2024 (Rp-billion)	2023 (Rp-billion)	2022 (Rp-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (Rp-billion)	Percentage (%)	Nominal (Rp-billion)	Percentage (%)
Related parties	155	136	118	19	14.0 ↑	18	15.3 ↑
Third parties	1,324	674	657	650	96.4 ↑	17	2.6 ↑
Total	**1,479**	**810**	**775**	**669**	**82.6 ↑**	**35**	**4.5 ↑**

In order to run its business, BNI carries out derivative financial instruments such as foreign currency forward contracts, foreign currency swaps, interest rate swaps, and spot transactions to finance, trade, and hedge. BNI's derivative payables increased by IDR669 billion, or 82.6%, to IDR1.5 trillion from the previous year of IDR810 billion. The increase in derivative payables came specifically from derivative payables to third parties of 96.4% or IDR650 billion.

Securities Sold under Agreements to Repurchase

In 2024, BNI recorded securities sold under agreements to repurchase increased by IDR9.0 trillion or 130.6% from IDR6.9 trillion in 2023 to IDR15.9 trillion. The annual interest rate for securities sold under agreements to repurchase was 5.50%-8.38% (Rupiah) and 1.85%-4.75% (US Dollar) for 2024.

Acceptance Payables

In 2024, BNI recorded a decrease in acceptance payables of IDR1.5 trillion or 26.4% from IDR5.7 trillion in 2023 to IDR4.2 trillion. This decrease was due to acceptance receivables to third parties from the previous year of IDR4.7 trillion to IDR3.3 trillion in 2024.

Accrued Expenses

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Issuer Bank Liabilities	245	461	308	(216)	(46.9)	↓	153	49.7	↑
Office Expenses	413	467	474	(54)	(11.6)	↓	(7)	(1.5)	↓
Technology and Telecommunication Expenses	615	559	510	56	10.0	↑	49	9.6	↑
Loyalty Expenses	49	50	48	(1)	(2.0)	↓	2	4.2	↑
Promotion Expenses	5	5	6	0	0.0		(1)	(16.7)	↓
Others	202	122	95	80	65.6	↑	27	28.4	↑
Total	**1,529**	**1,664**	**1,441**	**(135)**	**(8.1)**	↓	**223**	**15.5**	↑

In 2024, BNI's accrued expenses reached IDR1.5 trillion, a decrease of 8.1% compared to the position in 2023 of IDR1.7 trillion. The decrease in accrued expenses was mainly due to BNI's obligations as the issuer bank of IDR245 billion.

Taxes Payables

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Corporate Income Tax	223	702	1,392	(479)	(68.2)	↓	(690)	(49.6)	↓
Other Taxes	95	121	159	(26)	(21.5)	↓	(38)	(35.9)	↓
Total - Net	**318**	**823**	**1,551**	**(505)**	**(61.4)**	↓	**(728)**	**(46.9)**	↓

In 2024, BNI recorded a decrease in taxes payables of 61.4% from IDR823 billion in 2023 to IDR318 billion. This decrease was in line with the decrease in corporate income tax debt from IDR702 billion in 2023 to IDR223 billion in 2024, a decrease of 68.2% or down IDR479 billion from the previous year.

Employee Benefits

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Short-term employee benefits	3,230	2,525	3,157	705	27.9	↑	(632)	(20.0)	↓
Long-term employee benefits	3,917	4,481	3,723	(564)	(12.6)	↓	758	20.4	↑
Total	**7,147**	**7,006**	**6,880**	**141**	**2.0**	↑	**126**	**1.8**	↑

In 2024, employee benefits reached IDR7.1 trillion, an increase of 2.0% compared to IDR7.0 trillion in 2023. BNI posted an increase in short-term employee benefits of IDR3.2 trillion, up 27.9% from IDR2.5 trillion in 2023. Long-term employee benefits, especially for the defined benefit pension programs, decreased by IDR564 billion or 12.6%, dominated by defined benefit pension programs, decreased by IDR756 billion.

Allowances

BNI's allowance account consists of estimated losses on commitments and contingencies as well as provisions for legal cases and others. In 2024, BNI recorded a provision of IDR2.3 trillion, an increase compared to the previous year's position of IDR2.2 trillion. This increase in provisions was due to estimated losses on commitments and contingencies of IDR2.3 trillion from the previous IDR2.2 trillion. This was due

to the establishment of provisions for off balance sheet accounts as an impact of the implementation of PSAK 109 in 2020. Meanwhile, reserves for legal and other cases increased by IDR2.1 billion compared to the previous position.

Other Liabilities

In 2024, other liabilities increased by 1.7% to IDR26.6 trillion from IDR26.1 trillion in 2023. The increase was driven by Liabilities to policyholders increasing by IDR1.4 trillion. However, there was a decrease in Term Deposits of Foreign Exchange from Export Proceeds (TD DHE) by IDR1.6 trillion compared to 2023.

Securities Issued

By Relationship	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Related parties	1,892	1,764	1,785	128	7.3	↑	(21)	(1.2)	↓
Third parties	11,083	3,129	3,112	7,954	254.2	↑	17	0.5	↑
Total	**12,975**	**4,893**	**4,897**	**8,082**	**165.2**	↑	**(4)**	**(0.1)**	↓

On April 5, 2024, BNI issued USD-denominated Senior Bonds, BNI Global Bond 2024 with a nominal value of USD500,000,000 (full amount) with a tenor of 5 years. As of December 31, 2024, BNI Global Bond 2024 had a net value of IDR8.0 trillion after deducting the unamortized issuance fee of IDR1.5 trillion.

Borrowings

Borrowings by Type	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Two step loans	49	52	56	(3)	(5.8)	↓	(4)	(7.1)	↓
Liquidity loans for members of primary cooperatives	1	1	1	-	0.0		-	-	
Bilateral loans	35,115	21,856	28,916	13,259	60.7	↑	(7,060)	(24.4)	↓
Bankers acceptance	4,171	7,768	6,066	(3,597)	(46.3)	↓	1,702	28.1	↑
Others	3,595	1,273	615	2,322	182.4	↑	658	107.0	↑
Total	**42,931**	**30,950**	**35,654**	**11,981**	**38.7**	↑	**(4,704)**	**(13.2)**	↓

BNI's loans consist of various loans, namely two-step loans, liquidity loans for members of primary cooperatives, bilateral loans, bankers acceptances, and other loans. Total loans received for the period ended December 31, 2024, amounted to IDR42.9 trillion, or increased by 38.7% from the same period in the previous year, which reached IDR30.9 trillion. This increase was dominated by bilateral loans of 60.7% to IDR35.1 trillion in 2024 from IDR21.9 trillion in the previous year.

Subordinated Securities

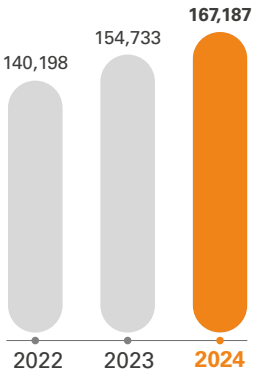
By Relationship	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Subordinated MTN	-	-	100	-	-		(100)	(100)	↓
BNI Tier 2	8,046	7,696	7,780	350	4.5	↑	(84)	(1.1)	↓
BNI Additional Tier	9,653	9,233	9,333	420	4.5	↑	(100)	(1.1)	↓
Total	**17,699**	**16,929**	**17,213**	**770**	**4.5**	↑	**(284)**	**(1.7)**	↓

As of December 31, 2024, BNI Tier 2 Subordinated Notes had a net value of IDR8.0 trillion after deducting unamortized issuance costs of IDR1.3 trillion and had obtained ratings from Moody's and Fitch with Ba2 and BB ratings, respectively.

EQUITY

In 2024, BNI's total equity was recorded at IDR167.2 trillion, an increase of 8.0% from IDR154.7 trillion in 2023. This significant increase came from an increase in retained earnings of 10.7%, or equivalent to IDR11.4 trillion compared to the previous year as a result of BNI's profit growth.

Total Equity
(IDR billion)



Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Share capital: Issued and fully paid	9,055	9,055	9,055	-	0.0		-	-	
Additional paid-in capital	17,010	17,010	17, 010	-	0.0		-	-	
Share-based Payment Reserves	323	260	-	63	24.2	↑	260	100.0	↑
Transactions with non-controlling interests	2,257	2,257	2,257	-	0.0		-	-	
Asset revaluation reserve	16,711	15,448	15,441	1,263	8.2	↑	7	0.0	↑
Unrealized gains (losses) on marketable securities and Government Bonds at fair value through other comprehensive income, net of tax	(1,465)	(896)	(1,971)	(569)	63.5	↑	1,075	(54.5)	↓
Differences in Foreign Currency Translation of Financial Statements	(97)	(58)	(36)	(39)	67.2	↑	(22)	(62.1)	↓
Retained earnings	118,664	107,236	94,060	11,428	10.7	↑	13,176	14.0	↑
Non-controlling interests	4,729	4,601	4,382	128	2.8	↑	219	5.0	↑
Treasury Shares	0	(180)	-	180	(100.0)	↓	(180)	-	
Total Equity	**167,187**	**154,733**	**140,198**	**12,454**	**8.0**	↑	**14,535**	**10.4**	↑

Total BNI equity in 2024 was recorded at IDR167.2 trillion, or an increase of 8.0% compared to last year, as a result of BNI's increasing profitability compared to last year, as further explained in detail in the points below.

Share Capital

BNI's share capital reached IDR9.1 trillion in 2024. This achievement remained the same as in 2023 of IDR9.1 trillion.

Additional Paid-in Capital

Additional paid-in capital/share premium at BNI reached IDR17.0 trillion in 2024. This achievement has not changed from 2023 of IDR17.0 trillion.

Asset Revaluation Reserve

The asset revaluation reserve in 2024 was recorded at IDR16.7 trillion, an increase of 1.3 trillion or 8.2% from 2023 of IDR15.4 billion. This was due to the realization of revaluation losses on fixed assets and buildings carried out in 2024.

Share-Based Payment Reserve

Referring to PSAK 102 concerning share-based payments, banks are required to form a Share-Based Payment reserve according to the market price on the Grant Date. The Company has a share ownership remuneration program for the Board of Directors, non-independent Board of Commissioners and employees whose distribution has been carried out in 2022. However, the opening of the lock up period for this distribution is carried out in stages until 2025. As a result of the program and mechanism for opening the lock up period which is still up to 2025, the bank has set aside reserves for share-based payments of IDR323 billion in 2024.

Transactions with Non-Controlling Interests

In 2024, transactions with non-controlling interests were recorded at IDR2.3 trillion, unchanged from 2023. The value of transactions with controlling interests is all proceeds from Sumitomo Life after deducting transaction costs for the strategic partnership of the acquisition of 40% of BNI Life shares by Sumitomo Life in 2013.

Unrealized Net Gains/Losses in Marketable Securities and Government Bonds at Fair Value through Other Comprehensive Income – Net of Tax

Unrealized Net Losses from the increase in the fair value of Marketable Securities and Government Bonds measured at fair value through other comprehensive income net of taxes at BNI amounted to IDR1.5 trillion in 2024, an increase of IDR569 billion from 2023, which experienced an unrealized loss of IDR896 billion. This increase was due to the mark to market calculation of FVOCI and AC securities with the decrease in the market reference rates in 2024 compared to 2023.

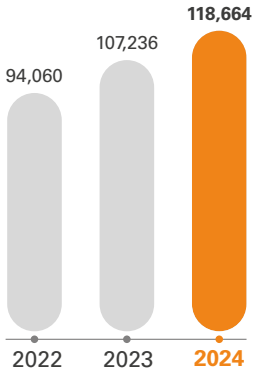
Exchange Difference on Translation of Foreign Currency Financial Statements

In 2024, BNI's losses from exchange differences on translation of foreign currency financial statements reached IDR97 billion, an increase of IDR39 billion compared to IDR58 billion in 2023.

Retained Earnings

In 2024, retained earnings reached IDR118.7 trillion, an increase of IDR11.4 trillion, or 10.7%, compared to IDR107.2 trillion in 2023. The increase in profit achievement in 2024 was supported by BNI's healthy business expansion in the low-risk segments, an increase in fee-based income, and improvements in asset quality. This increase in retained earnings has been reduced by cash dividend payments on profits in the 2023 fiscal year of IDR10.5 trillion.

Total Retained Earnings
(IDR billion)



Non-Controlling Interests

BNI's Non-controlling interests in the consolidated net assets of subsidiaries in 2024 reached IDR4.7 trillion, an increase of 2.8% or IDR128 billion from IDR4.6 trillion in 2023. This increase was due to an increase in profits of BNI subsidiaries.

Treasury Shares: Reacquired Share Capital

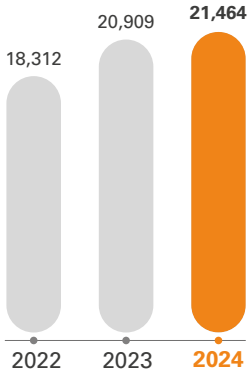
In 2024, the Bank allocated all treasury shares as a Share Ownership Program for Bank Management and Employees in the form of Bonus Shares.

Consolidated Statement of Profit or Loss and Other Comprehensive Income

In 2024, BNI delivered IDR21.5 trillion in profit for the current year attributable to owners of the parent entity, growing 2.7% year on year, and IDR22.5 trillion in Comprehensive Income for the current period attributable to owners of the parent entity, growing 4.5% year on year. The profit growth was mainly driven by an increase of 12.6% year on year in Non-Interest Operating, including digital fee-based income as a result of the Company's efforts to build transactional capabilities and digital services for both the Retail Segment through wondr by BNI and the Wholesale Segment through BNIdirect.

Net Profit (Profit Attributable to Owners of the Parent Entity - as a reference for dividend distribution)

(IDR billion)



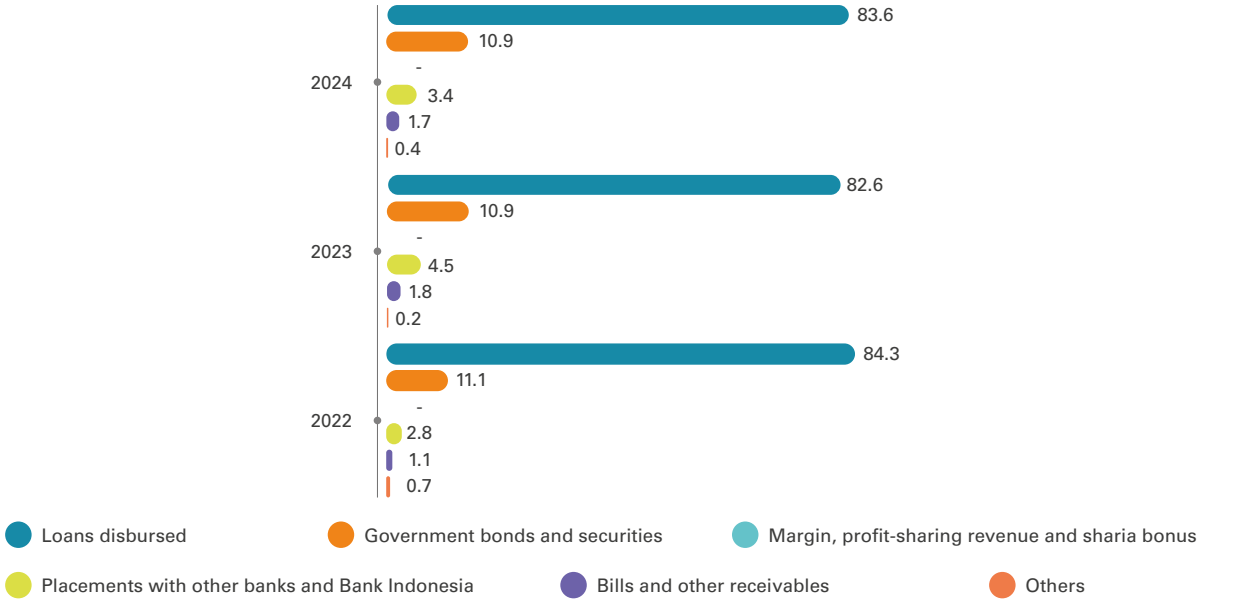
Statement of Profit or Loss and Other Comprehensive Income

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Interest income and sharia income	66,583	61,472	54,659	5,111	8.3	↑	6,813	12.5	↑
Sharia interest expense and income	(26,103)	(20,196)	(13,338)	(5,907)	29.2	↑	(6,858)	51.4	↑
Interest income and sharia income - net	**40,480**	**41,276**	**41,321**	**(796)**	**(1.9)**	↓	**(45)**	**(0.1)**	↓
Net premium income	1,724	1,659	1,551	65	3.9	↑	108	7.0	↑
Other operating income	22,311	19,812	18,600	2,499	12.6	↑	1,212	6.5	↑
Total operating income	**64,515**	**62,747**	**61,472**	**1,768**	**2.8**	↑	**1,275**	**2.1**	↑
Other operating expenses	(29,688)	(27,778)	(27,059)	(1,910)	6.9	↑	(719)	2.7	↑
Establishment of allowance for impairment losses	(8,211)	(9,196)	(11,514)	985	(10.7)	↓	2,318	(20.1)	↓
Operational profit	26,616	25,773	22,899	843	3.3	↑	2,874	12.6	↑
Non-net operating income (expenses)	(36)	(133)	(212)	97	(72.9)	↓	79	(37.3)	↓

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Profit before tax expense	**26,580**	**25,640**	**22,687**	**940**	**3.7** ↑	**2,953**	**13.0** ↑
Tax expense	(4,911)	(4,534)	(4,205)	(377)	8.3 ↑	(329)	7.8 ↑
Current year profit	**21,669**	**21,106**	**18,482**	**563**	**2.7** ↑	**2,624**	**14.2** ↑
Other comprehensive income, after income tax	997	674	(3,826)	323	47.9 ↑	4,500	(117.6) ↓
Total comprehensive income for the period	**22,666**	**21,780**	**14,656**	**886**	**4.1** ↑	**7,124**	**48.6** ↑
Profit for the year attributable to:							
Parent entity owner	21,464	20,909	18,312	555	2.7 ↑	2,597	14.2 ↑
Non-controlling interests	205	197	170	8	4.1 ↑	27	15.9 ↑
Total comprehensive income for the period attributable to:							
Parent entity owner	22,539	21,560	14,594	979	4.5 ↑	6,966	47.7 ↑
Non-controlling interests	127	220	62	(93)	(42.3) ↓	158	254.8 ↑
Earnings per Share Attributable to Owners of the Parent Entity (EPS) (Full Rupiah)	**576**	**561**	**983**	**15**	**2.7** ↑	**(422)**	**(42.9)** ↓

Interest Income and Sharia Income

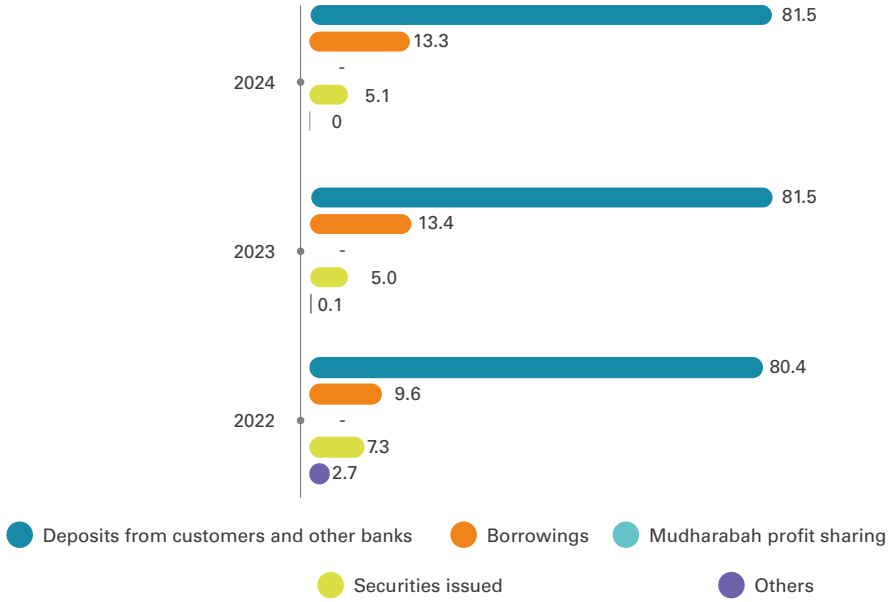
Account	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Loans disbursed	55,681	83.6	50,753	82.6	46,102	84.3	4,928	9.7 ↑	4,651	10.1 ↑
Government Bonds and securities	7,245	10.9	6,695	10.9	6,077	11.1	550	8.2 ↑	618	10.2 ↑
Placements with other banks and Bank Indonesia	2,282	3.4	2,781	4.5	1,537	2.8	(499)	(17.9) ↓	1,244	80.9 ↑
Bills and other receivables	1,133	1.7	1,091	1.8	577	1.1	42	3.8 ↑	514	89.1 ↑
Others	242	0.4	152	0.2	366	0.7	90	59.2 ↑	(214)	(58.5) ↓
Total	**66,583**	**100.0**	**61,472**	**100.0**	**54,659**	**100.0**	**5,111**	**8.3** ↑	**6,813**	**12.5** ↑



BNI's interest income was IDR66.6 trillion in 2024, an increase of 8.3% YoY. Interest income from loans still provided the largest contribution, with 83.6% of total interest income in 2024, followed by interest income from Government Bonds and Securities of 10.9%.

Interest Expense

Account	2024		2023		2022		Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Deposits from customers and other banks	21,276	81.6	16,458	81.5	10,726	80.4	4,818	29.3	↑	5.732	53.4	↑
Other bank borrowings	3,483	13.3	2,713	13.4	1,279	9.6	770	28.4	↑	1.434	112.1	↑
Securities issued	1,334	5.1	1,014	5.0	979	7. 3	320	31.6	↑	35	3.6	↑
Others	10	0	11	0.1	354	2.7	(1)	(9.1)	↓	(343)	(96.9)	↓
Total	**26,103**	**100.0**	**20,196**	**100.0**	**13,338**	**100.0**	**5,907**	**29.2**	↑	**6.858**	**51.4**	↑

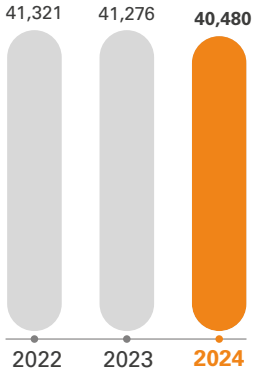


The composition of interest expense in 2024 increased by IDR5.9 trillion, or 29.2%, compared to the previous period. In addition to being dominated by deposits from customers and other banks, which were the main sources of BNI funding with a contribution of 81.6% in 2024 and 81.5% in 2023, the increase in interest expenses was also influenced by an increase in interest expenses on borrowings of IDR770 billion, or 28.4%, and interest expenses on securities issued of IDR320 billion, or 31.6%, from the previous year.

Interest Income - Net

In 2024, BNI booked interest income - net of IDR40.5 trillion, a decrease of 1.9% compared to the previous year, due to a more aggressive increase in interest expense of 29.2% YoY compared to an increase in interest income of 8.3% YoY. The significant increase in interest expense was the impact of tight liquidity, which resulted in an upward trend in interest rates in the market.

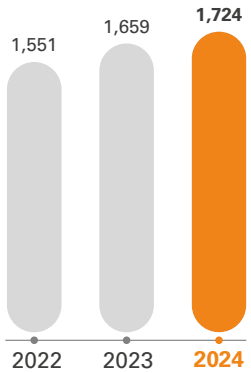
Interest Income and Sharia Income – Net
(IDR billion)



Premium Income - Net

This account represents the contribution of BNI Life as a BNI subsidiary that contributes to BNI's consolidated income. In 2024, BNI Life's net premium reached IDR1.7 trillion, an increase of 3.9% or IDR65 billion compared to IDR1.7 trillion in 2023. In addition, investment income was also affected by fluctuations in market prices for securities and Government Bonds, which are BNI Life's investment vehicles for developing its portfolio.

Premium Income - Net
(IDR billion)

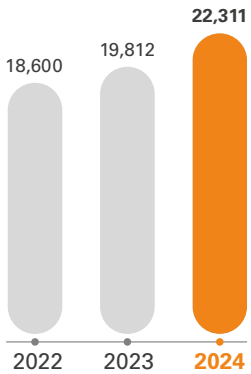


Other Operating Income

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Other fees and commission	10,249	10,120	9,738	129	1.3	↑	382	3.9	↑
Profit for Associated Entities	1,523	1,328	1,083	195	14.7	↑	245	22.6	↑
Recovery of assets written off	6,025	5,030	3,780	995	19.8	↑	1,250	33.1	↑
Unrealized gains/ (losses) from changes in the fair value of financial assets measured at fair value through profit or loss	145	73	15	72	98.6	↑	58	386.7	↑
Gain on sale of financial assets measured at fair value through other comprehensive income and fair value through profit or loss	1,769	1,180	1,332	589	49.9	↑	(152)	(11.4)	↓
Foreign exchange gains - net	1,262	1,019	1,597	243	23.8	↑	(578)	(36.2)	↓
Others	1,338	1,061	1,055	277	26.1	↑	6	(0.6)	↓
Total	**22,311**	**19,812**	**18,600**	**2,500**	**12.6**	↑	**1,212**	**6.5**	↑

In 2024, BNI's other operating income was IDR22.3 trillion, an increase of 12.6% from the position in 2023 of IDR19.8 trillion. The largest increase came from the recovery of assets written off, amounting to IDR6.0 trillion, an increase of 19.8% compared to the previous year's realization. BNI also recorded operating income from the profits of the associated entity PT Bank Syariah Indonesia Tbk of IDR1.5 trillion, an increase of 14.7% compared to IDR1.3 trillion in the December 2023 period. Revenue from other fees and commissions also increased by IDR129 billion, or 1.3%, compared to the previous year's realization.

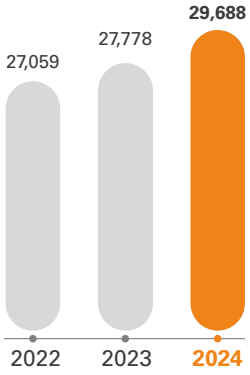
Other Operating Income
(IDR billion)



Other Operating Expenses

Account	2024		2023		2022		Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Salaries and Employee Benefits Expenses	13,948	47.0	12,834	46.2	12,456	46.0	1,114	8.7	↑	378	3.0	↑
General and Administrative Expenses	9,185	30.9	9,193	33.1	8,792	32.5	(8)	(0.1)	↓	401	4.6	↑
Promotion Expenses	1,136	3.8	1,067	3.8	1,116	4.1	69	6.5	↑	(49)	(4.4)	↓
Guarantee Savings Premiums	1,567	5.3	1,476	5.3	1,412	5.2	91	6.2	↑	64	4.5	↑
Others	3,852	13.0	3,208	11.5	3,283	12.2	644	20.1	↑	(75)	(2.3)	↓
Total	**29,688**	**100.0**	**27,778**	**100.0**	**27,059**	**100.0**	**1,910**	**6.9**	↑	**719**	**2.7**	↑

Total Other Operating Expenses
(IDR billion)



In 2024, other operating expenses increased by 6.9% or IDR1.9 trillion to IDR29.7 trillion from IDR27.8 trillion in 2023. This increase supported BNI's business expansion throughout 2024. The increase in other operating expenses was dominated by other expenses, which grew 20.1% year on year due to the increase in BNI's investment in digital banking services through the launch of wondr by BNI and New BNI Direct to increase customer transactions and is expected to be a catalyst for future business growth.

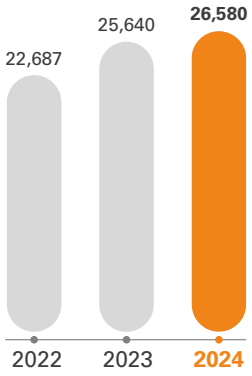
Establishment of Allowance for Impairment Losses

In 2024, the establishment of allowance for impairment losses decreased by IDR985 billion or 10.7% to IDR8.2 trillion from IDR9.2 trillion in 2023. The establishment of this allowance for impairment losses is in line with consistent improvements in asset quality and the impact of business acceleration in the low-risk segments.

Profit Before Tax Expenses

In 2024, BNI posted a profit before tax of IDR26.6 trillion, an increase of 3.7% compared to IDR25.6 trillion in 2023.

Profit Before Tax Expenses
(IDR billion)



Tax Expense

BNI's tax expense was IDR4.9 trillion in 2024, an increase of 8.3% compared to IDR4.5 trillion in 2023. This increase was mainly due to an increase in profit before tax of IDR940 billion from IDR25.6 trillion in 2023 to IDR26.6 trillion in 2024.

Other Comprehensive Income, After Income Tax

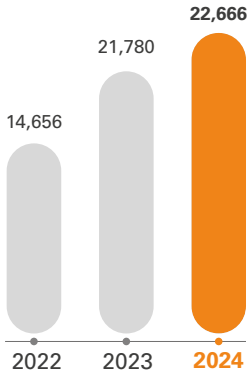
In 2024, BNI's other comprehensive income experienced a profit of IDR997 billion, from IDR674 billion in 2023. This was dominated by profits from the revaluation of fixed assets in 2024.

Total Comprehensive Profit for the Current Period

BNI's attributable profit and comprehensive income reached IDR22.7 trillion, an increase of IDR886 billion or 4.1% compared to IDR21.8 trillion in 2023.

Total Comprehensive Profit for the Current Period

(IDR billion)



Earnings per Share Attributed to Owners of the Parent Entity

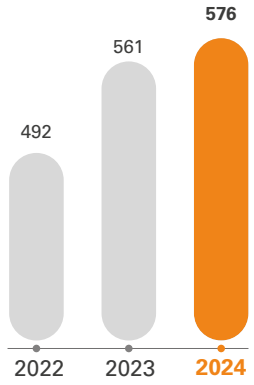
Basic earnings per share are calculated by dividing the profit for the year attributable to owners of the parent entity by the weighted average number of ordinary shares outstanding in the relevant year.

Account	2024 (IDR-billion)	2023*) (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Profit for the current year attributable to Equity Holder of the Parent Entity (IDR billion)	21,464	20,909	18,312	555	2.7	↑	2,597	14.2	↑
Weighted average number of ordinary shares outstanding (million shares)	37,290	37,257	18,638	33	0.1	↑	18,619	99.9	↑
Basic earnings per share attributable to Equity Holder of the Parent Entity (full amount)	576	561	492	15	2.7	↑	70	14.1	↑

*) In 2023, BNI carried out a corporate action in the form of a stock split with a ratio of 1:2 which effective starting October 6, 2023. The stock split did not cause a change in the value of share ownership by investors because the number of shares in circulation will double, followed by the share price adjusting 0.5 times the previous price.
**) Earnings per share for 2022 is recalculated as net income for 2022 divided by the number of shares for 2022 multiplied by 2 (following the 2023 stock split ratio of 1:2).

In 2024, Earnings per Share Attributable to Owners of the Parent Entity were recorded at IDR576, an increase of IDR561 or 2.7% from 2023.

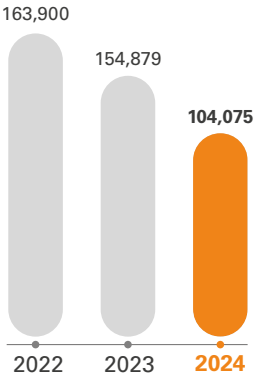
Basic Earnings per Share
(IDR)



Consolidated Statement of Cash Flows

In 2024, BNI recorded a decrease in net cash flows of IDR50.8 trillion, an increase of 472.3% compared to the decrease in net cash flows in 2023 of IDR8.9 trillion.The decrease in net cash flows was influenced by financing activities for dividend payments on current profit for the 2023 financial year and investment activities for the purchase of Securities and Government Bonds during 2024. Net cash flows from Operating, Investing and Financing Activities in 2024 were IDR63.2 trillion, IDR5.2 trillion, and IDR17.7 trillion, respectively.

Cash and Cash Equivalents at the End of the Year
(IDR billion)



Consolidated Statement of Cash Flows

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Net cash provided by operating activities	(63,218)	10,393	19,953	(73,611)	(708.3)	↓	(9,560)	(47.9)	↓
Net cash used for investment activities	(5,270)	(10,771)	(32,233)	(5,501)	(51.1)	↓	21,462	(66.6)	↓
Net cash from/ (used for) financing activities	17,718	(8,493)	2,725	26,211	(308.6)	↓	(11,218)	(411.7)	↓
Net increase in cash and cash equivalents	(50,770)	(8,871)	(9,555)	(41,899)	472.3	↑	684	7.2	↑
Impact of losing control	-	-	-	-	-		-	-	
Net cash flow after the impact of loss of control	(50,770)	(8,871)	(9,555)	(41,899)	472.3	↑	684	7.2	↑
Exchange rate impact	(34)	(150)	115	116	77.3	↑	(265)	(2.3)	↓
Cash and cash equivalents at the beginning of the year	154,879	163,900	173,340	(9,021)	(5.5)	↓	(9,440)	(5.4)	↓
Cash and cash equivalents at the end of the year	104,075	154,879	163,900	(50,804)	(32.8)	↓	(9,021)	(5.5)	↓

Cash Flows from Operating Activities

BNI's net cash used in operating activities was IDR63.2 trillion in 2024, and provided from operating activities was IDR10.4 trillion in 2023. The operating cash flow activity was influenced by deposits from customers of IDR5.2 trillion in 2024 while in 2023 it was IDR41.5 trillion. In terms of the operating assets, the decrease in operating cash flows was also influenced by loans of IDR36.2 trillion from the previous IDR63.3 trillion in 2023 to IDR99.5 trillion in 2024.

Cash Flows from Investment Activities

In 2024, BNI posted net cash flows from investment activities of IDR5.3 trillion, dominated by the proceed from Government Bonds (net) of IDR1.2 trillion and the purchase of Securities (net) of IDR974 billion and a reduction in fixed assets of IDR3.1 trillion.

Cash Flow from Financing Activities

In 2024, net cash flows obtained for financing activities was recorded at IDR17.7 trillion. There are 2 financing activities that dominate, namely receipt from borrowings of IDR29.0 trillion and borrowings payments of IDR16.6 trillion. In addition, there was also proceed in securities sold under agreements to repurchase (net) of IDR8.4 trillion and receipt in securities issued (net) of IDR8.2 trillion. On the other hand, there was a payment of dividends of IDR10.5 trillion.

Cash and Cash Equivalents at the End of the Period

In 2024, BNI posted a net decrease in cash and cash equivalents deficit of IDR50.8 trillion, dominated by cash flow from borrowings from operational activities and payment of dividends from financing activities, so that the cash and cash equivalents at the end of 2024 were IDR104.1 trillion.

Statements of Changes in Equity

PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Transaksi dengan kepentingan nonpengendali/ *Transactions with non-controlling interest*	Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealised losses on marketable securities and Government Bonds at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference on translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan pembayaran berbasis saham/ *Share-based payment reserve*	Total ekuitas pemilik entitas induk/*Total equity owners of parent*	Kepentingan nonpengendali/ *Non-controlling interest*	Total ekuitas/ *Total equity*	
								Dicadangkan/ *Appropriated*						
							Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated**)						
Saldo pada tanggal 31 Desember 2023		**9,054,807**	**17,010,254**	**2,256,999**	**(896,178)**	**(58,367)**	**15,447,829**	**2,778,412**	**104,457,102**	**(179,960)**	**260,116**	**150,131,014**	**4,601,506**	**154,732,520**	***Balance as of 31 December 2023***
Laba tahun berjalan		-	-	-	-	-	-	-	21,882,818	-	-	21,882,818	205,798	22,088,616	*Profit for the year*
Laba komprehensif lainnya untuk tahun berjalan	8,13	-	-	-	(568,881)	(38,631)	1,263,566	-	-	-	-	656,054	(78,332)	577,722	*Other comprehensive income for the year*
Pembagian dividen	34	-	-	-	-	-	-	-	(10,454,738)	-	-	(10,454,738)	-	(10,454,738)	*Distribution of dividends*
Saham treasuri		-	-	-	-	-	-	-	-	179,960	-	179,960	-	179,960	*Treasury shares*
Penambahan cadangan pembayaran berbasis saham	43	-	-	-	-	-	-	-	-	-	62,473	62,473	-	62,473	*Additional of share-based payment reserve*
Saldo pada tanggal 31 Desember 2024		**9,054,807**	**17,010,254**	**2,256,999**	**(1,465,059)**	**(96,998)**	**16,711,395**	**2,778,412**	**115,885,182**	**-**	**322,589**	**162,457,581**	**4,728,972**	**167,186,553**	***Balance as of 31 December 2024***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

*) *Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

ABILITY TO OPERATE AS WELL AS ABILITY TO GENERATE PROFITS AND PERFORM EFFICIENCIES

Description	2024 (%)	2023 (%)	2022 (%)	Difference 2023-2024 (%)	Difference 2022-2023 (%)
Asset Quality					
Non Performing Loan (NPL)	2.0	2.1	2.8	(0.1)	(0.7)
NPL Coverage Ratio	255.8	319.0	278.3	(63.2)	40.7
Profitability					
Return on Assets (ROA)	2.5	2.6	2.5	(0.1)	0.1
Return on Equity (ROE)	15.8	16.8	16.4	(1.0)	0.4
Return on Equity (ROE) - Equity Based	14.2	15.2	14.9	(1.0)	0.3
Net Interest Margin (NIM)	4.2	4.6	4.8	(0.4)	(0.2)
Efficiency					
Operating Expenses to Operating Income (BOPO)	70.0	68.4	68.6	1.6	(0.2)
Cost to Income (CIR)	44.6	42.9	42.6	1.7	0.3
Liquidity					
Loan to Deposit Ratio (LDR)	96.1	85.8	84.2	10.3	1.6
Macroprudential Intermediation Ratio (RIM)	93.3	89.0	83.4	4.3	5.6

Asset Quality Ratio

1. **Non Performing Loan (NPL) Ratio**
   BNI's NPL as of December 31, 2024 decreased from the previous year's 2.1% to 2.0%, while Net NPL increased from 0.6% to 0.7%. This achievement was due to BNI's policy of prudently managing productive assets amidst the loan expansion period, by selectively choosing loan sectors that focus on Top Tier debtors and their derivative businesses supported by management of debtors in trouble through remedial and restructuring schemes to support improvements in debtors' financial and business conditions. All the key measures for BNI's NPL management.
2. **NPL Coverage Ratio**
   BNI's NPL Coverage Ratio as of December 31, 2024 was maintained at 255.8% in line with the quality improvements made, as seen from the decrease in the NPL ratio. The improvement in the NPL ratio accompanied by maintaining the NPL coverage ratio proves that BNI is always conducting healthy and prudent business growth.

Profitability Ratio

1. **Return on Assets (ROA)**
   BNI's Return on Assets (ROA) for the period of December 31, 2024 was at the level of 2.5%, in line with BNI's profit in 2024 which grew by 2.7%.
2. **Return on Equity (ROE)**
   BNI's Return on Equity (ROE) - Equity Based was recorded at 14.2%, in line with BNI's profit in 2024 of IDR21.5 trillion.
3. **Net Interest Margin (NIM)**
   BNI's Net Interest Margin (NIM) experienced a slowdown from 4.6% in 2023 to 4.2% in 2024 which was due to the significant percentage increase in interest expenses, which was above the growth in interest income.

Efficiency Ratio

1. **Operating Expense to Operating Income Ratio**
   BNI's BOPO (Operating Expense to Operating Income) ratio increased to 70.0% in 2024 from 68.4% in 2023. This was in line with the increase in interest expenses due to liquidity pressures in the market, which has an impact on the decline in NIM.
2. **Cost to Income Ratio (CIR)**
   Cost to Income Ratio (CIR) is a ratio that measures the level of efficiency of operating expenses incurred to obtain optimal income. BNI's CIR increased by 1.7% from 42.9% in 2023 to 44.6% in 2024 in line with the increase in operating expenses in 2024, especially in digitalization costs, due to BNI's efforts to invest more resources to improve its digital services through the launch of wondr by BNI and BNIdirect.

Liquidity Ratio

1. **Loans to Deposit Ratio (LDR)**
   Loans to Deposit Ratio reports the ratio of loans disbursed to deposits collected by BNI. In 2024, BNI's LDR was recorded at 96.1%, an increase of 10.3% compared to 2023 of 85.8%. LDR 2024 was 96.1% due to BNI receiving incentives to reduce MSR by around 3%, from the original MSR of 9% to around 6% accompanied by a reduction in the portion of special rate funds, therefore, the Cost of Fund is expected to be more efficient.
2. **Macroprudential Intermediation Ratio (RIM)**
   In 2024, BNI's Macroprudential Intermediation Ratio increased to 93.3% compared to 89.0% in 2023. The RIM ratio level met the regulator's requirements of 84% -94%.

Compliance Ratio

Account	2024 (%)	2023 (%)	2022 (%)	Difference 2023-2024 (%)	Difference 2022-2023 (%)
Minimum Statutory Reserve (MSR)					
MSR (Rupiah)	6.5	9.5	11.9	(3.0)	(3.4)
MSR (Foreign Currencies)	4.0	4.0	4.0	-	-
Net Open Position	0.9	1.7	1.6	(0.8)	0.1
BMPK Violation Percentage	Nil	Nil	Nil	-	-
BMPK Exceedance Percentage	Nil	Nil	Nil	-	-

1. **Minimum Statutory Reserves (MSR)**
   BNI consistently maintained an optimal level of liquidity adequacy to its support daily operations and fulfill Bank Indonesia's regulations through the Minimum Statutory Reserves (MSR). In 2024, BNI's Rupiah MSR position was 6.5% and Foreign Currency MSR was 4.0%, a decrease compared to the position in 2023, especially in the Rupiah MSR of 3.0%. BNI's Minimum Statutory Reserves (MSR) is in accordance with Bank Indonesia Regulation (PBI) No. 24/4/PBI/2022 dated March 1, 2022 concerning the Minimum Mandatory Reserves for Commercial Banks in Rupiah and Foreign Currency for Conventional Commercial Banks, and the Board of Governors Members Regulation (PADG) Number 2 of 2023 dated April 1, 2023. The decrease in Rupiah MSR was due to BNI receiving incentives for MSR relaxation in accordance with Bank Indonesia's Macroprudential Liquidity Policy (KLM).
2. **Net Open Position**
   BNI's Net Open Position (NOP) for the period ending December 31, 2024 was recorded at 0.9%, lower than the position in the same period the previous year of 1.7%. This figure is still far below the maximum amount set by BI in PBI No. 5/13/PBI/2003 concerning the Net Open Position for Commercial Banks, as amended several times, most recently by PBI No. 17/5/PBI/2015, which is 20% of capital.
3. **Fulfillment of Compliance with the Legal Lending Limit (LLL)**
   Throughout 2024, there was neither any breach nor violation of exceeding the Legal Lending Limit. BNI has established adequate policies and monitors the Legal Lending Limit (LLL) and House Limit (Maximum Limit of Credit License) for large debtors.

Commitments and Contingencies

BNI's commitments and contingencies with details stated in the contract value as follows:

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Commitment Receivables							
Unsettled Purchase of Foreign Currency Futures	211,120	95,743	95,553	115,377	120.5	190	0.2
Others	87	83	84	4	5.3	(1)	(1.2)
Total	**211,207**	**95,826**	**95,637**	**115,381**	**120.4**	**189**	**0.2**
Commitment Payables							
Unused Customer Loan Facilities	57,553	55,883	57,335	1,670	3.0	(1,452)	(2.5)
Outstanding Irrevocable Letters of Credit	9,953	16,854	16,074	(6,901)	(40.9)	780	4.9
Sales of Foreign Currency Futures Unresolved	210,838	95,576	96,358	115,262	120.6	(782)	(0.8)
Others	87	84	85	3	3.6	(1)	(1.2)
Total	**278,431**	**168,397**	**169,852**	**110,034**	**65.3**	**(1,455)**	**(0.9)**
Contingent Receivables							
Bank Guarantees Received	27,162	23,426	20,691	3,736	15.9	2,735	13.2
Interest Receivable on Non Performing Assets	11,790	12,030	11,673	(240)	(2.0)	357	3.1
Others	533	459	382	74	16.1	77	20.2
Total	**39,485**	**35,915**	**32,746**	**3,570**	**9.9**	**3,169**	**9.7**
Contingent Payables							
Guarantees Issued in the form of Performance Bonds	29,531	29,116	26,927	415	1.4	2,189	8.1
Advance Payment Bonds	12,002	11,951	10,809	51	0.4	1,142	10.6
Standby Letters of Credit	20,640	15,062	12,868	5,578	37.0	2,194	17.1
Other Bank Guarantees	9,717	9,465	10,412	252	2.7	(947)	(9.1)
Bid Bonds	1,560	1,183	2,092	377	31.9	(909)	(43.5)
Shipping Guarantee	0	-	-			-	-
Others	3,120	2,001	571	1,119	55.9	1,430	250.4
Total	**76,570**	**68,778**	**63,679**	**7,792**	**11.3**	**5,099**	**8.0**

Commitment and contingency transactions that occur in the Bank's normal activities that carry credit risk are explained in the following table:

	2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease) 2023-2024	
			Nominal (IDR-billion)	Percentage (%)
Bank Guarantees Issued				
Related Parties	22,790	22,324	466	2.1
Third Parties	50,661	44,453	6,208	14.0
Irrevocable Letters of Credit				
Related Parties	3,908	12,276	(8,368)	(68.2)
Third Parties	6,044	4,578	1,466	32.0
Unused Loan Facilities				
Related Parties	16,172	9,205	6,967	75.7
Third Parties	41,381	46,679	(5,298)	(11.3)
Total	**140,956**	**139,515**	**1,441**	**1.0**

Commitment and contingency transactions that have loan risks based on collectibility are explained in the following table:

Account	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Current	137,900	135,987	133,206	1,913	1.4	2,781	2.1
Special Mention	2,128	2,879	2,735	(751)	(26.1)	144	5.3
Substandard	42	68	39	(26)	(38.2)	29	74.4
Doubtful	54	80	65	(26)	(32.5)	15	23.1
Loss	832	501	473	331	66.1	28	5.9
Total	**140,956**	**139,515**	**136,518**	**1,441**	**1.0**	**2,997**	**2.2**

Commitment Receivables in 2024 increased by 120.4% or IDR115.4 trillion, dominated by Unsettled Purchased of Foreign Currency Futures. The amount of Commitment Payables in 2024 increased by IDR110.0 trillion or 65.3% compared to 2023, which was mostly influenced by an increase in Sales of Foreign Currency Futures Unresolved. Contingent Receivables in 2024 increased by 9.9% compared to 2023, dominated by an increase in Bank Guarantees received by 15.9% and Others by 16.1%. The Contingent Payables position increased by 11.3% in 2024 compared to 2023, influenced by an increase in Standby Letter of Credit by 37.0% and Others by 55.9%. In general, fluctuations in the movement of commitments and contingencies posts were in line with credit growth, considering that debtors were increasingly optimizing the use of BNI's diverse products and services with competitive features.

Spot Transactions, Derivatives, and Hedging Facilities

PT Bank Negara Indonesia (Persero) Tbk (BNI) actively carries out derivative financial instrument transactions both for the Bank's interests and to meet customer needs. Through the implementation of a structured strategy, BNI utilizes derivative instruments including SPOT, Forward, Currency Swap, Interest Rate Swap, Cross Currency Swap, and Options to manage exposure to market risks, such as foreign currency risk and interest rate risk.

All derivative instruments are recognized in the consolidated statement of financial position at fair value in accordance with applicable accounting standards. Derivative assets are recorded if the fair value of the contract shows a positive number, and derivative liabilities are recorded if the fair value of the contract shows a negative number.

Changes in fair value are recorded directly in the consolidated statement of income, thereby reflecting the real-time impact of market movements. Fair value measurements are based on discounted cash flow models, financial pricing models, or prices quoted by brokers for similar instruments that have the same market characteristics.

BNI has expertise and experience in executing derivative instruments with a balanced strategy between the Bank's internal needs and those of customers. The focus on compliance, efficiency, and accuracy allows BNI to provide significant added value for investors.

With this step, BNI not only maintains its financial stability but also provides innovative solutions for risk management for customers. This combination creates a competitive advantage that supports BNI's vision as a trusted financial partner at the national and global level.

With a commitment to prioritizing the principles of good corporate governance (GCG), BNI continues to innovate in providing optimal added value for shareholders and all stakeholders.

All derivative receivables as of December 31, 2024 and 2023 are classified into the current category based on the results of the Bank's management review and evaluation.

Derivative Receivables and Payables by Type and Currency

Instruments	2024			2023		
	Notional Amount In Foreign Currency (Full Amount)	Fair Value		Notional Amount In Foreign Currency (Full Amount)	Fair Value	
		Derivative Receivables (IDR-Million)	Derivatif Payables (IDR-Million)		Derivative Receivables (IDR-Million)	Derivative Payables (IDR-Million)
Exchange Rate Related						
Forward contract - buy						
AUD	1,000,000	-	(727)	-	-	-
CNY	490,150,583	5,156	(4,938)	416,972,397	7,084	-
USD	619,063,138	145,043	(16,782)	543,853,761	3,039	(78,127)
Forward contract - sell						
CNY	-	-	-	102,000,000	19	-
EUR	-	-	-	4,000,000	-	(988)
USD	709,039,849	35,034	(114,357)	246,529,197	38,242	(7,255)
Foreign currency swaps - buy						
EUR	7,000,000	-	(1,565)	46,764	18	-
GBP	2,500,000	-	(828)	-	-	-
JPY	35,963,593,684	5,170	(74,125)	27,529,802,340	72,213	(929)
SGD	43,000,000	-	(1,599)	15,000,000	969	-
USD	1,720,986,416	423,786	(55,650)	968,073,582	11,349	(198,979)
Foreign currency swaps - sell						
AUD	200,000	68	-	11,000,000	270	(50)
EUR	118,766,365	43,757	(1,458)	85,959,000	1,228	(16,180)
GBP	20,500,000	5,724	(401)	15,000,000	294	(1,447)
NZD	7,000,000	117	-	-	-	-
SGD	57,890,550	1,953	(6,592)	88,844,400	8,123	(238)
USD	1,454,456,761	41,171	(256,972)	1,328,878,993	300,017	(6,393)
Foreign currency spots - buy						
AUD	461,560	3	(5)	40,800,000	-	(825)
EUR	6,550,000	16	(117)	16,500,000	-	(783)
GBP	2,100,000	-	(47)	3,250,000	-	(281)
USD	233,043,126	218	(13,280)	198,539,729	956	(4,759)
Foreign currency spots - sell						
AUD	8,000,000	41	(160)	35,064,185	482	(40)
CNY	90,000,000	1,484	-	-	-	-
EUR	1,402,632	5	(7)	9,900,000	337	-
GBP	97,000	1	-	-	-	-
USD	361,110,000	12,705	(394)	197,070,000	3,871	(834)
OTC Option - buy						
USD	2,490,000,000	362,558	(73,145)	-	-	-
OTC Option - sell						
USD	2,490,000,000	106,802	(362,141)	-	-	-
Exchange and Interest Rate Related						
Interest rate swap						
USD	530,138,055	167,815	(139,124)	530,138,055	356,400	(321,987)
Cross currency swaps and interest rate						
USD	758,826,078	340,969	(243,174)	776,376,200	157,150	(109,419)
Risk Free Rate						
IDR	1,000,000,000,000	22,306	(16,153)	1,000,000,000,000	11,408	(4,080)
USD	672,791,977	71,076	(95,444)	350,398,400	22,208	(56,868)
Total		**1,792,978**	**(1,479,185)**		**995,677**	**(810,462)**

Derivative Receivables and Payables by Relationships

	2024 (IDR-billion)	2023 (IDR-billion)	Increase (Decrease) 2023-2024	
			Nominal (IDR-billion)	Percentage (%)
Derivative Receivables				
Related Parties				
Foreign Currencies	341,832	37,939	303,893	801.0
Third Parties				
Rupiah	22,306	11,407	10,899	95.5
Foreign Currency	1,428,840	946,331	482,509	51.0
Total	**1,792,978**	**995,677**	**797,301**	**80.1**
Derivative Payables				
Related Parties				
Foreign Currencies	(154,840)	(136,138)	(18,702)	13.7
Third Parties				
Rupiah	(16,153)	(4,080)	(12,073)	295.9
Foreign Currencies	(1,308,192)	(670,244)	(637,948)	95.2
Total	**(1,479,185)**	**(810,462)**	**(668,723)**	**82.5**

All derivative receivables as of December 31, 2024 and 2023 are classified as current based on the Bank's management review and evaluation.

Pledged Bank Assets

There were no pledged assets at BNI in the period ending December 31, 2024.

Prime Lending Rate (SBDK)

Based on OJK Regulation No. 37/POJK.03/2019, as updated through POJK No. 13 of 2024 dated July 30, 2024 concerning Transparency and Publication of the Prime Lending Rate (SBDK) for Conventional Commercial Banks, it is stipulated that Conventional Commercial Banks are required to prepare, announce and submit SBDK.

The prime lending rate implementation aims to provide clarity to customers and facilitate customers in weighing the benefits, costs and loan risks offered by the Company. In addition, publication of SBDK is intended to improve Good Governance and promote healthy competition in the banking industry, among others, through the creation of better market disciplines.

In addition, the prime lending rate is used as an indicator of the amount of loan interest rates that will be charged to customers applying for Bank loans. Therefore, BNI updates the prime lending rate in accordance with the movement of the reference interest rate set by Bank Indonesia.

In general, SBDK is calculated based on 3 (three) components, namely the Principal Cost of Funds for Credit (HPDK) arising from customer fund collection activities, operating expenses incurred for fundraising and lending and the profit margin component set by the Company in its lending activities. The prime lending rate calculation does not take into account the risk premium component of the debtor, the amount of which depends on the risk assessment of each debtor. Thus, the loan interest rate charged to debtors is not necessarily the same as the prime lending rate.

BNI is required to report the prime lending rate calculation to OJK and the public. With the enactment of POJK No. 13 of 2024, there are several changes to the preparation of the prime lending rate as of September 2024, including the method/reference for the preparation of the prime lending rate and the addition of Credit Segmentation, from the previous 5 (five) segmentations to 7 (seven) segmentations.

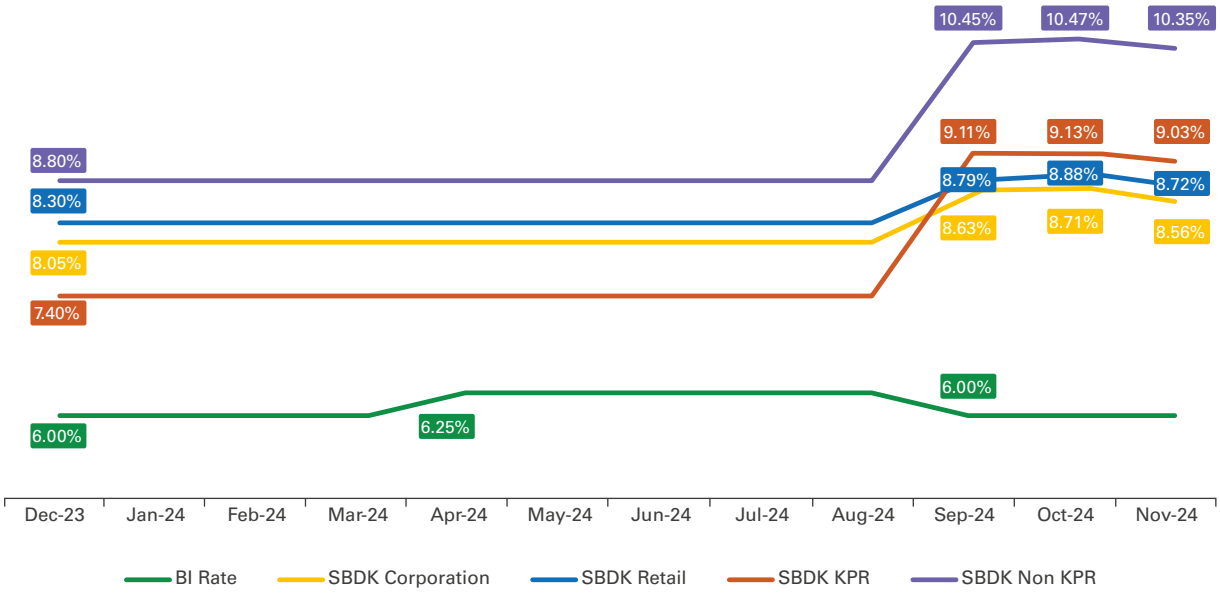
The following shows the prime lending rate determined by BNI in 2024:

(Effective % per annum)

Month	Prime Lending Rate						
	Based on Type of Credit						
	Non MSME Credit		MSME Credit			KPR/KPA	Non KPR/ NonKPA
	Corporate	Retail	Medium*	Small*	Micro		
January 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
February 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
March 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
April 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
May 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
June 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
July 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
August 2024	8.05%	8.30%	-	-	-	7.40%	8.80%
September 2024	8.63%	8.79%	9.80%	10.43%	11.61%	9.11%	10.45%
October 2024	8.71%	8.88%	9.83%	10.46%	11.62%	9.13%	10.47%
November 2024	8.56%	8.72%	9.71%	10.47%	11.59%	9.03%	10.35%
December 2024	8.80%	9.00%	9.96%	10.85%	11.89%	9.32%	10.69%

* *There is a new segmentation in September 2024

IMPACT OF CHANGES IN INTEREST RATES ON BNI PERFORMANCE



Throughout 2024, Bank Indonesia raised the benchmark interest rate once on April 24, 2024, by 25bps to 6.25%, then brought it back down on September 18, 2024 by 25bps to 6.00%. The Bank Indonesia Board of Governors (RDG) Meeting on November 20, 2024 decided to keep its BI-Rate at 6%, the Deposit Facility interest rate at 5.25%, and the Lending Facility interest rate to 6.75%. The decision to maintain the BI-Rate at 6.00% remains consistent with the focus of pro-stability monetary policy which is to strengthen Rupiah exchange rate stabilization as well as pre-emptive and forward looking measures to ensure inflation remains under control within the target of 2.5±1% in 2024.

The movement of the benchmark interest rate did not affect the SBDK directly. It can be seen in the Corporate, Retail, KPR, and Non-KPR SBDK from BNI which has not changed from January to August 2024.

FEE BASED INCOME ACCELERATION GROWTH

Account	2024		2023		2022		Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Total (IDR-billion)	Composition (%)	Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Recurring Fee	15,669	96.2	14,438	97.7	13,629	92.0	1,231	8.5	809	5.9
Non Recurring Fee	617	3.8	344	2.3	1,191	8.0	273	79.4	(847)	(71.1)
Total	**16,286**	**100.0**	**14,783**	**100.0**	**14,820**	**100.0**	**1,504**	**10.2**	**(38)**	**(0.3)**

Development of Fee Based Income

(IDR billion)



In 2024, fee-based income was IDR16.3 trillion on a consolidated basis or grew by 10.2% from the previous year of Rp14.8 trillion. The biggest increase was in recurring fees which were able to grow 8.5% YoY, mainly driven by fees based on digital transactions such as Billpayment fees which grew by 25.2% YoY, cash management fees (API, Cash Pooling) which were able to grow 82.8% YoY as a positive impact of improving digital banking services through the launch of wondr by BNI and New BNIdirect this year.



Ability to Pay Debt

BNI maintains a good level of liquidity and solvency.This is demonstrated by BNI's ability to fulfill all maturing obligations on time, both in terms of debt principal payments and interest payments.

1. **Bank Liquidity: Ability to Pay Short-Term Debt**
   BNI's ability to fulfill short-term obligations is carried out with good liquidity management. In order to improve short-term liquidity resilience, BNI always maintains adequate liquidity by managing several indicators including Primary Reserve (Statutory Reserves and Cash), Secondary Reserve (liquidity reserves), and Liquidity Coverage Ratio (LCR) in accordance with regulatory requirements.

   LCR is a comparison ratio between High Quality Liquid Assets (HQLA) and estimated total net cash outflow for the next 30 days in a crisis scenario. In December 2024, BNI's LCR reached 147.95% (bank only) and 150.67% (consolidated), above the regulator's provisions which stipulate that LCR fulfillment is at least 100%.

   To manage liquidity over a longer period (1 year), BNI maintains the Net Stable Funding Ratio (NFSR) by increasing the Bank's funding stability, adjusted to the composition of assets and administrative accounts. NSFR is a ratio comparing the Available Stable Funding with the Required Stable Funding. As of December 2024, BNI's NSFR was 132.48% (bank only) and 133.08% (consolidated), above the regulatory provisions which stipulate NSFR compliance at a minimum of 100%.

Description	2024 (%)	2023 (%)	2022 (%)	Difference 2023-2024 (%)		Difference 2022-2023 (%)	
Liquidity Coverage Ratio (LCR)							
Bank Only	147.95	191.5	219.0	(43.55)	↓	(27.5)	↓
Consolidation	150.67	197.2	223.4	(46.53)	↓	(26.2)	↓
Net Stable Funding Ratio (NFSR)							
Bank Only	132.48	145.3	164.1	(12.82)	↓	(18.8)	↓
Consolidation	133.08	146.4	165.7	(13.32)	↓	(19.3)	↓

2. **Bank Solvency: Ability to Pay Long-Term Debt**
   Bank capital is the most important component in measuring the ability to pay long-term debt (solvency ratio). Therefore, BNI always ensures that its capital is able to meet the Capital Adequacy Ratio (CAR) requirements.

Description	2024 (%)	2023 (%)	2022 (%)	Difference 2023-2024 (%)		Difference 2022-2023 (%)	
Capital Adequacy Ratio (CAR)-Tier I	20.0	20.3	17.5	(0.3)	↓	2.8	↑
Capital Adequacy Ratio (CAR)-Tier II	1.4	1.7	1.8	(0.3)	↓	(0.1)	↓
Capital Adequacy Ratio (CAR) (Loan, Market and Operational Risk)	21.4	22.0	19.3	(0.6)	↓	2.7	↑

BNI's Capital Adequacy Ratio (CAR) represents the ratio of capital to Risk-Weighted Assets (RWA). In 2024, BNI's CAR stood at 21.4%, reflecting a slight decline of 0.6% from 22.0% in 2023. However, this figure still indicates that BNI's capital structure remains robust and capable of absorbing credit risk, market risk, and operational risk. Moreover, the ratio remains well above the minimum capital adequacy requirements set by regulators.

Company Receivables Collectibility Level/Loan Collectibility Level

Asset Quality

Description	2024 (%)	2023 (%)	2022 (%)	Difference 2023-2024 (%)		Difference 2022-2023 (%)	
Non-Performing Loan (NPL) Neto	0.7	0.6	0.5	0.1	↑	0.1	↑
Non-Performing Loan (NPL) Gross	2.0	2.1	2.8	(0.1)	↓	(0.7)	↓
Adequacy ratio of provision for losses to non- performing loans/Coverage Ratio	255.8	319.0	278.3	(63.2)	↓	40.7	↑

In December 2024, BNI's Gross NPL Ratio was recorded at 2.0%, a better figure of 0.1% compared to the previous year as continuous improvements in credit quality through selective efforts of expansion in leading sectors that had low risk, more stringent credit underwriting process, and more prudent credit monitoring process. Along with the decline in NPLs, we also maintained an adequate level of credit risk provisioning, as seen from the NPL Coverage Ratio which was maintained at 255.8% this year.

Loan Restructuring

Total restructured loans as of December 31, 2024 amounted to IDR66.8 trillion, down IDR9.0 trillion or 11.9% from IDR75.8 trillion in the previous year.

Restructured Loans Based on Restructuring Categories

Category	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Decrease in Loan Interest Rates	25,710	23,729	27,824	1,981	8.3	↑	(4,095)	(14.7)	↓
Extension of Loan Period	24,754	25,940	26,100	(1,186)	(4.6)	↓	(160)	(0.6)	↓
Other Restructuring Scheme	16,294	26,122	38,135	(9,828)	(37.6)	↓	(12,013)	(31.5)	↓
Total	**66,758**	**75,791**	**92,059**	**(9,033)**	**(11.9)**	↓	**(16,268)**	**(17.7)**	↓
Allowance for Impairment Losses	(27,930)	(33,615)	(36,560)	5,685	(16.9)	↓	2.945	(8.1)	↓
Total - Net	**38,829**	**42,176**	**55,499**	**(3,347)**	**(7.9)**	↓	**(13.323)**	**(24.0)**	↓

Restructured Loans per Collectibility

Description	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Current	34,478	40,863	62,684	(6,385)	(15.6)	↓	(21,821)	(34.8)	↓
Special Mention	25,255	29,500	19,183	(4,245)	(14.4)	↓	10,317	53.8	↑
Substandard	2,954	2,388	2,804	566	23.7	↑	(416)	(14.8)	↓
Doubtful	667	678	723	(11)	(1.6)	↓	(45)	(6.2)	↓
Loss	3,404	2,362	6,665	1,042	44.1	↑	(4,303)	(64.6)	↓
Total	**66,758**	**75,791**	**92,059**	**(9,033)**	**(11.9)**	↓	**(16,268)**	**(17.7)**	↓

Restructured Loans per Type of Business Sector

Description	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Business Services	6,942	9,129	11,250	(2,187)	(24.0)	↓	(2,121)	(18.9)	↓
Social Services	823	995	1,339	(172)	(17.3)	↓	(344)	(25.7)	↓
Construction	13,093	13,156	14,570	(63)	(0.5)	↓	(1,414)	(9.7)	↓
Others	3,546	3,765	6,908	(219)	(5.8)	↓	(3,143)	(45.5)	↓
Electricity, Gas and Water	788	364	428	424	116.5	↑	(64)	(15.0)	↓
Freight, warehousing and communications	5,279	5,258	6,963	21	0.4	↑	(1,705)	(24.5)	↓
Trading, Restaurants and hotels	9,406	13,292	19,741	(3,886)	(29.2)	↓	(6,449)	(32.7)	↓
Mining	5,771	7,743	1,283	(1,972)	(25.5)	↓	6,460	503.5	↑
Industry	19,517	19,073	24,557	444	2.3	↑	(5,484)	(22.3)	↓
Agriculture	1,593	3,016	5,020	(1,423)	(47.2)	↓	(2,004)	(39.9)	↓
Total	**66,758**	**75,791**	**92,059**	**(9,033)**	**(11.9)**	↓	**(16,268)**	**(17.7)**	↓

The smaller number of restructured loans corresponds to the decline in the most affected sectors such as the Trade, Restaurant and Hotel sector with IDR3.9 trillion or 29.2%, the Business Services sector with IDR2.2 trillion or 24.0%, the Agriculture sector with IDR1.4 trillion or 47.2% and the mining sector with IDR2.0 trillion or 25.5% from the previous year's position.

Restructured Loans per Designation Type

Designation	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Working capital Loans	50,651	54,956	60,116	(4,305)	(7.8)	↓	(5,160)	(8.6)	↓
Investment Loans	12,561	17,095	26,191	(4,534)	(26.5)	↓	(9,096)	(34.7)	↓
Consumptive Loans	3,546	3,740	5,752	(194)	(5.2)	↓	(2,012)	(35.0)	↓
Total	**66,758**	**75,791**	**92,059**	**(9,033)**	**(11.9)**	↓	**(16,268)**	**(17.7)**	↓

Total restructured loans decreased significantly or by IDR9 trillion or 11.9% from the corresponding figure in 2023. The composition of restructured loans as of December 31, 2024 was dominated by Working Capital Loans that accounted for 75.9% of the total restructured loans or IDR51 trillion.

Restructured Loans per Segment Type

Segment	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024		Increase (Decrease) 2022-2023	
				Nominal (IDR-billion)	Percentage (%)	Nominal (IDR-billion)	Percentage (%)
Consumer	935	3,738	5,766	(2,803)	(75.0) ↓	(2,028)	(35.2) ↓
Corporate	45,692	49,319	48,418	(3,627)	(7.4) ↓	901	1.9 ↑
Small	8,646	9,328	13,543	(682)	(7.3) ↓	(4,215)	(31.1) ↓
Middle	11,485	13,406	24,332	(1,921)	(14.3) ↓	(10,926)	(44.9) ↓
Total	**66,758**	**75,791**	**92,059**	**(9,033)**	**(11.9)** ↓	**(16,268)**	**(17.7)** ↓

Segments that experienced decreases in restructured loans were the corporate segment that decreased by IDR3.6 trillion or 7.4% (YoY), followed by the medium segment that decreased by IDR1.9 trillion or 14.3% (YoY) and the consumer segment that decreased by IDR2.8 trillion or 75.0% (YoY).

Credit Risk Management

Credit risk management at BNI is an essential process, which is run to maintain the quality of the Bank's earning assets, and manage all potential losses that may arise due to failure on the part of debtors to meet their credit obligations. BNI's strategy has always been provide loan facilities to customers with proven credit track record. In addition, BNI runs very prudent risk process and applies a very strict loan monitoring.

STRATEGY AND POLICY FOR 2024

BNI continues to apply its sustainable loan risk management strategies and policies to produce consistent quality loan growth. BNI continues to optimize Credit Risk Management and carries out enhancements at every stage of the credit process by determining target markets based on priority sectors, developing Pipeline Management with Pre Screening and Risk Acceptance Criteria (RAC) that have been sharpened, strengthening the underwriting process, credit monitoring, and credit remedial & recovery.

In 2024, BNI implemented a New Way of Working (NWOW) by strengthening credit risk management in all BNI loan segments, with the assistance of SEVP Credit Risk and Senior Credit Risk Executive (SCX), and by strengthening the risk function in all operational units.

To improve loans, BNI continued to improve its risk culture through an end-to-end credit process transformation program that included strengthening LaR management strategies. In 2024, BNI instigated strategic policies supported by initiatives to strengthen discipline in the credit risk management and processes. Here are some of the strategies and policies BNI executed in 2024 to strengthen risk management in the corporate, enterprise, and commercial banking segments:

1. Pipeline Management Development
   a. Increasing business expansion in Diamond Clients, Diamond+ Clients, Wave Clients, KLN debtors, Regional Target Market, value chain, supply chain financing, expansion in to be pushed & potential sectors, and Cross Selling with due consideration of Environmental, Social and Corporate Governance (ESG) factors and by weighing Industry Risk Appetite, Risk Acceptance Criteria, Risk Appetite Statement for Credit Risk, and Loan Exposure Limit.
   b. Supporting quality credit expansion through the preparation of sector expansion quadrant guidance in exploring the business potential of each industrial sector in each region.
   c. Running a better risk management by developing technology infrastructure and digital innovation through data driven based on customer experience analytics and partnership expansion.
   d. Consistently assuming a supportive role in MSME businesses through BNI Xpora to increase MSMEs to Go Global potential.
   e. Developing solutions that support the value chain, which involved reviewing Supply Chain Financing/Open Account Financing and Bank Guarantee products (including the application of scoring for Bank Guarantee products) to support transaction solutions that can increase debit balances and fee-based income (FBI).

2. Development of the underwriting process
   a. Integrating all credit process applications end-to-end through the development of the Loan Management System (LMS) in all segments with the hope of increasing efficiency, productivity, and asset quality.
   b. Self-assessment checklist for ESG fulfillment criteria according to the industrial sector.
   c. Increasing understanding of the financed industrial sector through the preparation of Credit Guidance for priority sectors.
   d. Adjusting customer-centric segmentation and fine tuning credit scoring and Risk Acceptance Criteria based on industrial sectors.
   e. Implementing credit risk analytics through sensitivity analysis and stress testing of credit portfolios along with changes in economic conditions, reviewing credit risk methodologies, risk-based pricing, and enhancing impairment models.
   f. Optimizing underwriting tools with adjustments to BNI policies and accommodating business needs.

g. Enhancement of verification tools (including PACE) in an effort to improve the quality of verification in the Commercial segment.

3. Strengthening the Monitoring Process
   a. Optimizing the use and development of the Single Integrated Monitoring Tool (SIMON) as a tool to monitor debtors.
   b. Using monitoring tools such as EWS Moody's, Bloomberg, and Checklist Monitoring as initial screening for action against debtors.
   c. Intensive monitoring of debtor conditions and pairing that effort with comprehensive evaluation and handling of debtors to determine the level of debtor loans that are more sustainable and handling troubled debtors more progressively, including restructuring, strategic investors, phase out or downsizing through the sale of collateral (joint effort business units, risk, and remedial recovery).
   d. Determining action plans based on the results of monitoring the performance of debtors of overseas branches which covered historical credit facility utilization, fulfillment of covenants, accuracy of payment of obligations, transactions, and assessment of potential lawsuits.
   e. Implementing the Credit Risk Portfolio Committee to optimize credit risk management that can affect the bank's health level by conducting credit risk assessments as a basis for determining the adequacy of reserves, discussing developments in conditions along with portfolio quality, and determining follow-up strategies for credit management.
   f. Running business banking credit portfolio management through credit quality monitoring to maintain bank-wide target achievement.

4. Improving Human Resources Capabilities and Competencies
   a. Improving competencies through the implementation of Risk Awareness/training/certification and risk mitigation through the provision of industry data/information in accordance with industry specializations.
   b. Enhancing Corporate and Enterprise Credit Risk Manager (CRC) capabilities in accordance with the managed industry specializations and Commercial Credit Risk (CCR) through various soft skill and hard skill trainings.
   c. Improving HR capabilities in risk management through a focused and structured Risk Culture development program in accordance with AKHLAK.
   d. Implementing Credit Risk Review for KLN and enhancing the capabilities of KLN HR who carry out risk functions to support the development of trade and investment centers.

5. Strengthening Remedial & Recovery
   Optimizing credit rescue and settlement using conventional strategies such as restructuring debtors' troubled yet still prospective loans and meeting the 3 (three) pillars, massive auctions, optimizing cooperation with Third Parties and non-conventional strategies including credit collateral sales acceleration programs.

At the same time, the plan and strategy of risk management in the retail credit segment was continuously run comprehensively and prudently with constant improvements, as given below:

1. Increasing selective retail credit business expansion through:
   a. Focus on BNI Fleksi expansion to the low-risk segment through:
      - Optimizing the provision of BNI Fleksi Aktif to fixed income selected institutions and Corporate Client companies based on the determination of institutional classification.
      - Optimizing the provision of BNI Fleksi Pensiun to Taspen, ASABRI, and selected participants of SOE/ROE Pension Fund in accordance with the established Risk Acceptance Criteria (RAC).
      - Automation of BNI Fleksi approval on the mobile banking channel for selected segments based on the established RAC criteria.
      - Adjustment of BNI Fleksi provisions for financing to prospective debtors who work in companies included in the Warning List with due attention to the prudential principle.
   b. Focus on Credit Card expansion to the low-risk segment through:
      - Optimizing acquisition through staff channels with relaxation without fixed lines to selected segments (having a good SLIK history, passing scoring, already on payroll/customers, permanent employees of selected companies).
      - Calibration of Credit Card eForm scoring to ensure optimum results of decision automation
      - Selective in providing credit cards with the Pre Embossed mechanism or providing management references for credit card applications.

c. Focus on BNI Griya expansion to the low-risk segment through:
   - Optimizing BNI Griya expansion to purchase new homes in developers in collaboration with BNI (primary market segment) especially in top highly selected developers, highly selected developers, selected developers, and local selected developers.
   - Optimizing BNI Griya for the fixed income segment of selected institutions, BNI payroll customers, Emerald customers, and existing BNI Griya/Business Banking debtors with good performance.
   - Making adjustments to BNI Griya provisions for financing to prospective Non-fixed income debtors in the secondary market segment (i.e., purchasing a new property from non-collaborating developers, purchasing a second property, take over, top up, renovation/construction, refinancing, and BNI Griya Multiguna) with due regard of prudential principle.

d. Retail credit expansion through cooperation with financial technology-based third parties, digital partners, and utilization of data leads.

2. Strengthening risk management role, especially in the expansion of the Business Program on:
   a. Preparation of Risk Acceptance Criteria (RAC) for BNI Wirausaha Loan Andalan UMKM (BWU Pandu) Products for KUR facility debtor graduations.
   b. Preparation of RAC for BNI Wirausaha Products (BWU) linkage channeling.
   c. Strengthening risk analysis and mitigation in each proposal for Core Plasma Investment Credit Facilities.
   d. Implementation of non-relationship based as a quality expansion management strategy with a focus on separating expansion management in business units and on quality management in the RCR unit in the business program segment.
3. Implementing the use of credit scoring in running credit processes up to IDR 10 billion in retail productive credit.
4. Sharpening the management of retail productive credit portfolios by determining regional and unit categories based on credit quality indicators that are used as references for expansion policies in regions and units.
5. Remapping Retail Productive Credit Risk (RPR) management to run a more effective retail productive credit management.
6. Improving risk culture through end-to-end credit process transformation by simplifying the credit process based on segments with due attention to the principle of prudence.
7. Setting up the Head of Retail Productive Credit Risk (HRP) responsible for expansion and quality of credit for the managed regional portfolio and authorized to decide on credit distribution.
8. Strengthening digital capability through sustainable innovation, including:
   a. Development of a mobile collection system to improve collection in consumer product and business program (dhi. BNI Griya, BNI Fleksi, KUR, and BWU).
   b. Improvement of assessment (standardized digitally through BNIMove within a radius coverage of 10 km and RAC Finance) on business program credit.
   c. Expansion of product features that can be accessed through BNIMove (KUR, BWU, and BWU Pandu).
   d. Integration of BNIMove with the Financial Supply Chain Management (FSCM) system to facilitate credit disbursement on BWU retail financing products.
   e. Development of pre-screening automation and other underwriting-related capability tools to support business processes for business program products
   f. Enhancement of verification tools (including PACE) in an effort to improve the quality of verification on retail productive credit.
   g. Implementation of Credit Decree (SKK) and Credit Agreement (PK) automation of standardization and acceleration of SKK & PK preparation time for BNI Fleksi and BNI Griya Pembelian.
   h. Storage of Integrated Credit Documentation (PDKT) for consumer credit.
   i. Automation of credit insurance closing (for BNI Fleksi) through ePolis.
   j. Automation Instruction Credit (ASIC) as a process of automating credit bookkeeping orders and loan account maintenance while also a means of documenting underlying transaction processes.
   k. E-Office365 as a means of communication and acceleration of the decision-making process in the context of validating SKK, PK, and credit disbursement through automation and document integration with real-time collaboration equipped with OneDrive and sharepoint features as well as a guaranteed data security and protection system.
9. Improving HR capabilities through end-to-end credit process training.
10. Maximizing the strategies that have been implemented since the previous year as follows:
    a. Optimizing the use of Interactive WA.
    b. Optimization of Legal Action Collection (simple lawsuits, lawyer's summons, cession, bankruptcy, and Attorney General's Office).
    c. Acceleration of auctions based on the classification of potential collateral.

In the event of a troubled credit portfolio in the Corporate Banking, Enterprise Banking, Commercial Banking, and Retail Banking segments, BNI made credit rescue efforts referred to as collection, remedial and/or recovery activities. To avoid Corruption, Collusion, and Nepotism (KKN) practices including gratification in the credit granting process, BNI strengthened the implementation of the Integrity Pact by requiring debtors or prospective debtors to sign the Integrity Pact before signing the credit agreement (PK).

In managing credit risk, BNI continued to make improvements through:
1. The preparation of electronic Company Guidelines (e-PP) that offered guidance for implementing credit granting.
2. Monitoring of maximum credit limit or BMPK and House Limit for large debtors.
3. The implementation of PSAK 71 in the context of credit risk reserves or ECL.

IMPROVEMENT OF THE CREDIT PROCESS

BNI continues to improve the credit distribution process flow in Business Banking (Corporate, Enterprise, Commercial and Retail Banking Segments). The improvement of the credit granting process flow carried out includes:

1. Sharpening the function of the business unit in planning prospect lists, marketing, making comprehensive assessments of creditworthiness (including first way out and second way out analysis) and monitoring debtors.
2. Sharpening the function of the risk unit starting from the Pipeline Management stage, making credit risk analysis (deep dive) and identification-mitigation/risk control, as well as analyzing and monitoring information related to credit and the debtor's industry.
3. Implementing in phases the collateral valuation function in Credit Operations to do checks & balances on the results of the Public Appraisal Service Office (KJPP) assessment, collateral CEV calculations, collateral assessments in the retail segment, implementation of advisory functions related to the credit facility structure in the credit committee, and credit operations documentary.
4. Simplification of the BNI Fleksi credit disbursement process flow while still considering risk mitigation at each stage.
5. Conducting reviews related to the tiering of credit document validation authority (SKK & PK) and credit disbursement at the Retail Credit Operations unit.

In addition, to minimize the risk in credit distribution for the Business Banking segment, there is a Rejected Debtor Directory (3D) application through which the Business unit can access data to verify declined debtors or declined prospective debtors.

The retail segment also continued to improve end-to-end credit digitalization through the development of a Loan Management System (LMS) to simplify and accelerate the debtor acquisition process, as well as strengthen the underwriting process more standardized with measurable risks.

CREDIT MONITORING

BNI carefully monitors credit and the condition of the debtor industry as well as intensive credit collection to create quality asset growth. We conduct monitoring using various methods, which involve closely attending to business progress both indirectly (online) and directly, conducting a review of the creditworthiness of the debtor, and monitoring the payment of debtor obligations. In principle, the credit monitoring process is based on an assessment of the 3 (three) pillars in the OJK provisions on the quality of productive assets.

The following are efforts BNI has made in the credit quality monitoring process in the Business Banking segment:
1. Developing and strengthening of Single Integrated Monitoring Tools (SIMON) as an early warning system to detect debtors who have the potential to be problematic and monitor their action plans.
2. Sharpening portfolio management analysis through intensive monitoring of the adequacy and availability of funds in the debtor's account to fulfill their obligations.
3. Optimizing LaR portfolio management by implementing 4M (mapping, reducing, avoiding, and controlling).
4. Setting action plan based on monitoring results of performance of overseas branch debtor which include historical utilization of credit facilities, fulfillment of covenants, accuracy of payment of obligations, transactions, and assessment of potential lawsuits.
5. Implementing the Credit Risk Portfolio Committee in order to optimize credit risk management that can affect the bank's health level by conducting credit risk assessments as a basis for determining the adequacy of reserves, discussing developments in conditions along with portfolio quality, and determining follow-up strategies for credit management.

6. Business Banking credit portfolio management through credit quality monitoring to maintain bank-wide target achievement.

Meanwhile, credit monitoring for retail credit is carried out by:

1. Determining credit quality thresholds (Pre NPL and NPL) for each program and cooperation with third parties.
2. Monitoring and limiting the BNI Griya and BNI Fleksi credit process for certain segments at Branch Offices included in the corrective action and institutions where debtors work that are included in the warning list
3. Conducting quarterly performance reviews of developers working with BNI Griya
4. Monitoring the implementation of non-relationship based implementation and determining the threshold for Corrective Action KUR & BWU
5. Overseeing the retail productive credit processing unit in order to evaluate the credit process and explain credit quality.
6. Adjusting the provisions of the Debt Service Payment Account (DSPA) and Debt Service Reserve Account (DSRA) so that it can increase engagement with debtors in retail productive credit
7. Improving the provisions of the Cycle Payment Date to ensure its determination aligns with the Cash to Cash Cycle of debtors in retail productive credit
8. Increasing debtor monitoring through the SIMON application by strengthening the RPR function as SIMON approval
9. Conducting routine monitoring of the Implementation of SIMON tools.
10. Conducting intensive monitoring of the availability of debtor funds to pay their obligations to the Bank.
11. Segmenting collection priority based on historical transaction scoring analysis and historical credit card payments.
12. Prioritizing collection based on warning list institution segmentation for BNI Fleksi products.
13. Increasing collection productivity through the implementation of the Mobile Collection application for credit card products.
14. Submitting credit quality improvements to centers/branches.
15. Making adjustment of debtor due dates based on payment behavior.
16. Collaborating on buyback guarantees to related developers.
17. Submitting notification to debtors and collateral owners to immediately extend collateral documents that will mature through a Notary/PPAT appointed by the Bank.

CREDIT RESCUE AND SETTLEMENT

To strengthen financial fundamentals and maintain loan quality, BNI implemented efforts to optimally handle nonperforming loans, coupled with a prudent increase in the coverage ratio. In this case, including loans that have been written off, efforts are also being made to optimally resolve them to minimize the Bank's losses.

Efforts to deal with non-performing loans in the corporate, medium and small segments are generally pursued through 2 (two) strategies, namely credit rescue and settlement. The rescue strategy includes:

1. Restructuring (restructuring, reconditioning, rescheduling) for debtors who are experiencing difficulties in fulfilling their obligations but still have prospects and are considered cooperative;
2. Proactively conducting monitoring and Joint Effort Loan at Risk (LaR).
3. Increasing collection of principal & interest installments.
4. Selling collateral with downsizing facilities to suit the debtor's capabilities

Meanwhile, the settlement strategy is applied to debtors who are considered to have no prospects, and/or ability to pay, including:

1. Sale of collateral (auction and non-auction).
2. Debt settlement through strategic investors.
3. Legal action through litigation, bankruptcy/PKPU, civil lawsuits, and debt collection (personal guarantee and company guarantee).

In addition to the efforts mentioned above, alternative credit rescue or settlement processes are also carried out through both program initiatives and non-conventionally, including:

1. Acceleration of settlement of problematic assets through auction programs by increasing coordination and cooperation with related parties (DJKN/KPKNL and ATR/BPN).

2. Acceleration program for settlement of problematic assets through a governed scheme (cessie or other programs).
3. Strengthening cooperation with third parties (Lawyers, Collection Agents, JPN, Securities and others).
4. Investor Gathering.

As mentioned above, troubled retail loans were handled using 2 (two) strategies, namely credit rescue and settlement. Credit rescue and settlement strategies carried out include:

1. Asset Quality Improvement and Recovery Acceleration Program (PPKA) for debtors who are having difficulty meeting their obligations but still show prospects and thus are considered feasible through restructuring and/or special discounts.
2. Optimization of buyback guarantees and Collateral Auction sites/websites.
3. Optimization of Legal Action Collection (simple lawsuits, cession, summons, bankruptcy, and JPN).
4. Acceleration of auctions based on the classification of collateral potential and optimization of the Collateral Auction website, as well as cooperation with third parties (dhi. Property Agents).
5. Credit settlement through the transfer of NPL receivables and Write-Off (cession-transfer or sale of credit bills owned by the bank against debtors to other parties or investors according to the criteria set by the Bank).
6. Optimization of remedial and recovery through cooperation with third parties (dhi. collection agencies).

CREDIT RISK MANAGEMENT PERFORMANCE IN 2024

BNI's Gross NPL ratio at the end of 2024 improved from the end of 2023, from 2.1% to 2.0% or up 0.1% (YoY). The achievement was also seen in the LaR ratio, which improved by 2.6% (YoY) from December 2023 12.90% to 10.3% in December 2024. With the improvement in credit quality, BNI also recorded a decrease of 10.7% in loss impairments.

STRATEGY AND WORK PLANS FOR THE NEXT YEAR

In 2025 BNI will continue to optimize the previous program and has instigated strategic policies in the Corporate Banking, Enterprise Banking, Commercial Banking and Retail Productive Banking segments by planning several initiatives as follows:

1. Pipeline Management Development
   a. Continuing the expansion of Corporate Banking, Enterprise Banking, and Commercial Banking portfolios focusing on priority sectors.
   b. Quality credit expansion to improve market share, with a focus on prospective industries across all segments by reviewing Industry Risk Appetite, Risk Acceptance Criteria, Risk Appetite Statement for Credit Risk and Loan Exposure Limit while sharpening the guidance of the expansion sector quadrant exploring business potential of each industrial sector in each region.
   c. Considering Environmental, Social and Corporate Governance (ESG) factors in making expansion.
   d. Enhancement of the pipeline process for KLN debtors through the implementation of IRA and RAC.
   e. Enhancement of credit risk analytics, especially sensitivity analysis and commodity stress testing in response to macro changes.
   f. Further improvement in transaction solutions through optimization of transaction solutions to increase global market expansion, fee-based income, and sustainable CASA through Xpora, Supply Chain Financing/Open Account Financing, and other trade finance.
   g. Enhancement of 3D application (Debtor Directory Rejected) to strengthen pre-screening.

2. Development of Underwriting Process
   a. Self-assessment of ESG fulfillment criteria according to the industrial sector to improve BNI's ESG performance.
   b. Implementation of Loan Management System (LMS) in all segments that integrates the entire credit process starting from Pipeline Management, analysis, approval, administration and remedial & recovery processes that have an impact on increasing efficiency, productivity, and asset quality.
   c. Supporting quality credit expansion through the creation of risk studies based on priority sectors.
   d. Adjustment of customer-centric segmentation and Risk Acceptance Criteria based on industrial sectors.
   e. Enhancement of credit risk analytics through sensitivity analysis and stress testing of credit portfolios along with changes in economic conditions, review of credit risk methodology, risk-based pricing, and enhancement of impairment models.

f. Strengthening and optimizing underwriting tools that are adjusted to policies and accommodate business needs.
g. Implementation of PACE 2.0 as a tool to improve the quality of checking account verification in the Commercial segment.

3. Strengthening the Monitoring Process
   a. Continuous strengthening and enhancement of Single Integrated Monitoring Tools (SIMON) for all segments.
   b. Continued development of Checklist Monitoring phase II for Corporate & Enterprise segments and initiation of Checklist Monitoring development for Commercial segments that can assist managers in monitoring debtor conditions every quarter.
   c. Use of monitoring tools such as EWS Moody's, Bloomberg, Checklist Monitoring as initial screening for action on debtors and expansion of the use of EWS Moody's for KLN.
   d. Intensive monitoring of debtor conditions, accompanied by evaluation and comprehensive handling of debtors to determine the level of debtor loans that are more sustainable and handling of problematic debtors more progressively, including restructuring, strategic investors, phase out or downsizing through collateral sales (joint effort business units, risk and remedial recovery).
   e. Determination of action plans based on the results of monitoring the performance of KLN debtors which include historical utilization of credit facilities, fulfillment of covenants, accuracy of payment of obligations, transactions, and assessment of potential lawsuits.
   f. Improvement of the implementation of the Credit Risk Portfolio Committee in order to optimize the management of credit risk that can affect the bank's health level by conducting a credit risk assessment as a basis for determining the adequacy of reserves, discussing the development of the following conditions with portfolio quality, and determining follow-up strategies for credit management.
   g. Business Banking credit portfolio management through more precise credit quality monitoring for the achievement of bankwide targets.
   h. Intensive monitoring of debtor conditions, accompanied by comprehensive evaluation and handling of debtors to determine the level of debtor loans that are more sustainable and handling problematic debtors more progressively, including restructuring, strategic investors, phase out or downsizing through collateral sales (joint effort business units, risk and remedial recovery).

4. Improving Human Resources Capabilities and Competencies
   a. Improving HR capabilities in risk management through a focused and structured Risk Culture development program in accordance with AKHLAK.
   b. Improving HR capabilities and competencies, both soft skills and hard skills, through training, socialization related to credit process systems & automation, and certification.
   c. Enhancement of Credit Risk Review implementation and KLN HR capabilities that carry out risk functions to support credit distribution, trade development, and investment centers.

5. Strengthening Remedial & Recovery
   Optimizing credit rescue and settlement using conventional strategies such as restructuring NPL debtors who still have prospects and meet the 3 (three) pillars, massive auctions, optimizing cooperation with Third Parties, and programs to accelerate the sale of collateral of troubled loans.

6. Expansion of ASIC implementation in all Corporate & Enterprise segments for loan accounts that have booking offices throughout Indonesia.

7. Document Management System (DMS) for digital credit document management.

8. Collateral Management System (CMS) as credit guarantee database automation.

Meanwhile, the following are plans and strategies to improve credit quality in the retail credit segment in 2025:

Meanwhile, the following are plans and strategies to improve credit quality in the retail credit segment in 2025:

1. Focus on business expansion that prioritizes risk culture with a focus on low-risk segments:
   a. **BNI GRIYA** on fixed income selected (BUMN/ BUMD/BHMN Employees, Government Agencies, Educational Institutions, TNI/ Polri Members), Diamond Client, Deal Team, and Fund Customers, Emerald, Existing Debtors. Optimizing penetration on selected developers (Top Highly Developer Selected, Highly Selected, and Top 10 Local Selected Areas).

b. **BNI FLEKSI** on Fixed Income Selected (BUMN/ BUMD/BHMN Employees, PTN, CASN/ASN, Regulators, Higher Institutions/Government Agencies) and employees of institutions managed by the head office.
c. **CREDIT CARDS** on fund customers, payroll, selected companies, and management references that have a mature relationship with BNI.

2. Channeling cooperation with third parties (fintech and other financial institutions) by determining measurable RAC for flexi products, credit cards, and Linkage Channeling.
3. Compiling and reviewing Risk Acceptance Criteria (RAC) for retail credit distribution through debtor risk mapping (High – Low Risk).
4. Conducting credit process assessments to increase business expansion by prioritizing prudent risk culture:
   a. BNI Griya
      1) Simplifying the credit process for selected developers (Top Highly Developer Selected, Highly Selected, and Top 10 Local Selected Areas) while still carrying out the verification process.
      2) Adjusting BNI Griya processing provisions in order to improve credit quality at LNC or Branch Offices that have BNI Griya NPL credit quality above the threshold.
      3) Expansion in the non-fixed income secondary market segment is carried out by adhering to the principle of prudence and referring to applicable provisions.
   b. BNI Fleksi
      1) Expansion of the BNI Fleksi Pensiun (BFP) distribution market to Corporate Clients.
      2) Adjustment of policies for BNI Fleksi Aktif based on company profiling for the Private Company employee segment.
      3) Enrichment of BNI Fleksi Aktif features.
      4) Optimizing data leads through the BNI Fleksi Mobile Banking Digital Loan program with eligible debtor filtering on the datamart.
   c. Credit Cards
      1) Providing selective Management References for credit card applications based on the historical credit quality generated from the channel.
      2) Increase credit card credit limits carried out selectively to loyal cardholders who actively use BNI banking services.
      3) Be selective in providing credit cards with the Pre Embossed mechanism with the addition of corrective action to applicant geographies.
      4) Collaborate with BNI subsidiaries to explore new market potential while remaining prudent.
      5) Improvement and expansion of telesales channels (fintech debtors, home debtors, flexi debtors, and wondr by BNI users) as Credit Card acquisition channels.
      6) Optimization of Credit Card acquisition through e-form channels with card for card credit assessments from selected banks.
   d. BWU Credit
      1) Development of BWU Pandu Mikro Digital product to increase credit expansion program to value chain and digital partners, through easy additional collateral requirements but still paying attention to risk mitigation through transactional-based potential selection and digital ecosystem.
      2) Improvement of Working Capital Turnover (PMK) calculation for KMK credit facilities in the business program segment.
   b. Retail Productive
      1) Improve risk management function in developing special schemes to support retail productive credit growth.
      2) Improvement of Working Capital Turnover (PMK) calculation for retail productive credit segment.
      3) Improvement in managing retail productive credit portfolio by determining regional and unit categories based on credit quality indicators that are the reference for expansion policies in regions and units.

5. Increase risk awareness and risk culture, especially for retail credit through various digital channels, including: employee exams through the "deep46" menu on the employee application, the "Knowledge" menu on the BNI Move application, routine delivery of lessons learned to all retail credit processing units and others.
6. Conducting regular training and brevets related to retail credit provisions and processes for credit processing units including the Head of Retail Productive Credit (HRP) and Retail Productive Credit Risk (RPR) who act as credit decision makers so that credit decisions are increasingly qualified.
7. Increasing the number of Heads of Retail Productive Credit Risk (HRP) and implementing Retail Productive Credit Risk (RPR) clustering to strengthen the function of retail productive credit risk management.
8. Strengthening digital capability through enhancement of the underwriting process through:
   a. Development of the PACE 2.0 application for automation of analysis of bank statement mutations for prospective and existing debtors.
   b. Optimizing the use of the BNIdirect Supply Chain system which has been integrated with BNI Move for the credit disbursement process for BWU retail financing products.
9. Optimizing efforts to improve credit quality and recovery of the retail segment through:
   a. Implementation of write-offs the Micro and Small Business Funding Program (PUMK) in accordance with the policy to be regulated by the Ministry of SOEs.
   b. Increasing the intensity of visits to EWS (Early Warning System) Yes debtors by BNI Griya collection officers at STA branches.
   c. Segmentation of Pre-NPL debtors for collection priority (dunning, visit, and digital collection).
   d. Increasing the portion of collection in Col-4 from internal collection (inhouse) to third parties (collection agencies).
   e. Initiation of control of unfulfilled DSRA/DSPA for RPB products through the use of reminder automation (WhatsApp blast/SMS/voice blast).
   f. Acceleration of execution of debtor account hand over (AHO) for RPB products.
   g. Cooperating with property agents and Private Auction Houses (BLS) and e-Commerce.
   h. Focus on liquidation value, unoccupied, and collateral value above the debit balance as potential cession.
10. Strengthening digital capability in maintaining credit quality through innovations below:
    a. Utilizing Artificial Intelligence (AI) technology to increase collection productivity.
    b. Developing an auction website to monitor the auction process (from auction preparation to auction results).
11. Providing easy access to the BNI Griya developer Cooperation Agreement (PKS) database in supporting operational activities of collateral valuation in the retail segment.

Capital Structure and Management Policy for Capital Structure and Capital Risk Management Practices

Details of Bank Capital Structure

Capital Component-Bank Only	2024	2023	2022	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal	Percentage (%)		Nominal	Percentage (%)	
Core Capital (IDR billion)	142,043	130,938	118,936	11,105	8.5	↑	12,002	10.1	↑
Supplementary Capital (IDR billion)	10,264	11,079	12,400	(815)	(7.4)	↓	(1,321)	(10.7)	↓
Total Core Capital and Supplementary Capital (IDR billion)	152,307	142,016	131,336	10,291	7.2	↑	10,680	8.1	↑
Risk Weighted Assets (RWA) for Credit Risk (IDR billion)	660,200	609,161	586,142	51,039	8.4	↑	23,019	3.9	↑
Risk Weighted Assets (RWA) for Operational Risk (IDR billion)	37,411	34,967	92,999	2,444	7.0	↑	(58,032)	(62.40)	↓
Risk Weighted Assets (RWA) for Market Risk (IDR billion)	14,162	2,812	2,244	11,350	403.6	↑	568	25.3	↑
Core Capital Ratio (%)	20.0	20.2	17.5	(0.2)		↓	2.7		↑
Capital Adequacy Ratio for Credit Risk, Operational Risk and Market Risk (%)	21.4	22.0	19.3	(0.6)		↓	2.6		↑

Management Policy on Bank Capital Structure [ACGS B.3.1]

To anticipate domestic and global economic challenges as well as the increasing risk exposure faced by BNI, an effective and integrated capital management system is required. This system must support the achievement and sustainable growth of performance while enhancing BNI's competitiveness. BNI's capital management is conducted by maintaining a strong capital position to support business growth, retain investor, depositor, customer, and market confidence, and ensure compliance with capital adequacy requirements set by regulators while covering the risks managed by the Bank.

In its capital management, BNI maintains capital levels according to risk exposure and conducts periodic reviews.The Bank also considers factors such as optimizing shareholder returns, balancing higher profitability with the gearing ratio, and ensuring security through a sound capital position. This approach reflects BNI's strong commitment to maintaining a capital structure composition that complies with regulations and does not fall below the minimum limits set by the Financial Services Authority (OJK) as the banking regulator.

Basis for Policy

1. Core Capital
   Core capital consists of primary and additional core capital in accordance with the Financial Services Authority Regulation (POJK) on "Minimum Capital Requirement for Commercial Banks". BNI's core capital increased by 8.5%, rising from IDR130.9 trillion in 2023 to IDR142.0 trillion in 2024. This increase was driven by the Bank's profit throughout 2024 and a revaluation surplus balance of fixed assets amounting to IDR1.3 trillion.

2. Supplementary Capital (maximum 100% of core capital)
   Supplementary capital (referring to bank capital) consists of general reserves for productive assets and capital instruments that meet Tier 2 requirements. BNI's supplementary capital decreased by 7.4%, from IDR11.1 trillion in 2023 to IDR10.3 trillion in 2024. This IDR1.5 trillion decline was primarily due to the amortization of capital-characterized securities amounting to USD 500,000,000. The reduction in supplementary capital was influenced by the amortization of subordinated bond values, which are considered as part of the supplementary capital component.

Capital-Related Risk Management Practices

How BNI's capital can absorb risks is measured by calculating KPPM as prescribed by regulators, which involves the following phases:

1. Calculating the minimum capital adequacy based on the Risk-Weighted Assets (RWA) measurement method:
   a. Credit Risk: Standardized Approach
   b. Market Risk: Standardized Approach
   c. Operational Risk: Standardized Approach

2. Calculating the Minimum Capital Requirement according to BNI's risk profile.
   As of December 31, 2024, BNI's risk profile, which serves as one of the assessment factors for the Bank Soundness Rating (TKB), was rated at level 2 (Low to Moderate). Due to this Low to Moderate risk profile and calculations based on the Internal Capital Adequacy Assessment Process (ICAAP), the minimum Capital Adequacy Ratio (CAR) for BNI is set at 9.80%.

3. In addition to calculating the Minimum Capital Adequacy Requirement based on the risk profile, BNI also determines additional capital buffers to safeguard against financial and economic crises that could disrupt financial system stability. These additional capital buffers include Capital Conservation Buffer, Countercyclical Buffer, and Capital Surcharge for Systemic Banks. Additional buffer capital is carried out in accordance with the provisions of the Regulator.
   a. Capital Conservation Buffer is additional capital that functions as a buffer in the event of losses during a crisis period.
   b. Countercyclical Buffer is additional capital that functions as a buffer to anticipate losses in the event of excessive banking credit growth that has the potential to disrupt the stability of the financial system.
   c. Capital Surcharge is additional capital capacity that functions to reduce the negative impact on the stability of the financial system and the economy in the event of a Systemic Bank failure by increasing the Systemic Bank's ability to absorb losses.

When incorporating these capital buffers, Conservation Buffer of 2.50%, Countercyclical Buffer of 0.00%, and Capital Surcharge of 1.50%, BNI's total Minimum Capital Adequacy Requirement (KPMM) ratio threshold stands at 13.80%.

Material Commitments for Capital Goods Investments

During 2024, BNI recorded material commitment for investment in capital goods as follows:

No.	Project Name	Vendor
1	Construction of Pantai Indah Kapuk 2	- PT Virama Karya - PT Pembangunan Perumahan (Persero) Tbk - PT Alien Desain Nusantara - PT Kanta Karya Utama
2	Office Automation	- PT Air Mas Perkasa - PT Belpin Blessin Indonesia - PT Berca Hardayaperkasa - PT Bhinneka Mentaridimensi - PT Bismacindo Perkasa - PT Datascrip - PT Digital Teknologi Nusa - PT Multipolar Technology - PT Nextindo Global Solusi - PT Nusantara Compnet Integrator - PT Pandu Siwi Sentosa - PT Sentra Paramitra
3	Maverick MMP 1	- KJPP Toha, Okky, Heru, and Partner - PT Accenture - PT Adi Data Informatika - PT Bhinneka Mentaridimensi - PT Deloitte Konsultan Indonesia - PT Dymar Jaya Indonesia - PT Fan Integrasi Teknologi - PT Idpay Asia Jaya - PT Indocyber Global Teknologi - PT Ipsos Market Research - PT Karlin Mastrindo - PT Mastersystem Infotama - PT Mitra Integrasi Informatika - PT Niagaprima Paramitra - PT NTT Indonesia Technology - PT Nusantara Compnet Integrator - PT Phintraco Technology - PT Sentra Paramitra - PT Swadharma Duta Data
4	Treasury Management System	- PT Aurionpro Solutions Indonesia
5	Enterprise License	- PT Metrocom Global Solusi - PT Multipolar Technology
6	Base 24 Extension	- PT Abhimata Persada
7	LMS Wholesale	- PT FIS Systems Indonesia
8	#26 & 27 30 Raffles Place Rent	- ADM Design & Build (S) Pte Ltd - Crimsign Graphic Pte Ltd - Oxley Beryl Pte Ltd
9	Grha BNI Rennovation	- PT Setara Karya Permata - PT Alien Bangun Nusantara - PT Bumi Inti Persada Raya - PT Solargard Indonesia - PT Grafindo Triutama - PT Karya Perdana Baru - PT Grahacipta Hadiprana
10	Enterprise License Agreement – Dynatrace	- PT Mitra Integrasi Informatika

Commitment Purpose

The material commitment for capital goods investments includes the commitment to purchase capital goods as planned in BNI's Bank Business Plan (RBB).

Source of Funds

BNI's funding sources utilise the remaining investment budget, total depreciation expense and a share or percentage of net profit from the previous financial year as funding sources for capital expenditure from the previous financial year as a source of funding for capital expenditure.

Currency Used

All transactions carried out in the context of binding investment materials for capital goods are denominated in Rupiah.

Planned Steps to Protect Foreign Currency Risk

BNI does not protect against foreign currency protection risks as all investment capital goods commitments are carried out in Rupiah.

Capital Goods Investments Realized In The Last Fiscal Year

BNI issued funds for Capital Goods Expenditure investment to purchase a number of fixed assets or to increase the value of fixed assets that are expected to provide value for future benefits.

Types of Capital Goods Investment

The capital goods investments in 2024 totalled IDR3,894 billion, and consisted of buildings and land, automation equipment, non-automation equipment and vehicles, amounting to IDR1,689 billion, IDR1,689 billion, IDR274 billion and IDR62 billion, respectively.

Capital Goods Investment Purpose

BNI purchases capital goods to support the Company's overall operational activities.

Capital Goods Investment Value

The following table explains the capital goods investment value.

Types of Capital Goods Investment	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
Building and Land	1,689	1,027	404	662	64.5	↑	623	154.2	↑
Automation Equipment	1,869	1,236	899	633	51.2	↑	337	37.5	↑
Automation Equipment	274	207	146	67	32.4	↑	61	41.8	↑
Vehicles	62	1	3	61	6,100.0	↑	(2)	(66.7)	↓
Total	**3,894**	**2,471**	**1,452**	**1,423**	**57.6**	↑	**1,019**	**70.2**	↑

Property for Investment

As of the financial year ending December 31, 2024, BNI does not hold any property assets for investment purposes.

Information and Material Facts That Occurred After The Date of the Accountant's Report

During 2025, there is information and material facts to report that occurred after the date of the accountant's report until this Annual Report was published on January 22, 2025 as set out below. [ACGS C.8.1, C.8.2, C.8.3]

Share Buyback Plan

The Company announced its Share Buyback Plan issued by the public company and the Share Transfer Plan from the Buyback Results on February 4, 2025. Later, on February 17, 2025, the Company made some updates in the Information Disclosure pertaining to the Buyback Plan and the Share Transfer Plan from the Buyback Results. Furthermore, the Buyback Plan and the transfer of Buyback Shares will be submitted for approval at the Annual General Meeting of Shareholders for the 2024 fiscal year.

Business Target Achievements in 2024 [ACGS C.2.1]

PRESUMPTIONS FOR 2024 TARGET FORMULATION

When the 2024 target formulation process was underway at the end of 2023, global economic growth was projected at a lower 2.9% as various geopolitical factors were expected, during which FY2023 economic growth was estimated to close at 3.0%). As 2024 unfolded, the economy appeared to be growing at a stronger pace than initial expectations, so the IMF edged up its projection to 3.2% for the year in review and revised its projection for FY2023 to 3.3%.

Seeing stronger global economic growth, increased investments and the general elections in 2024, which were expected to be economic catalysts, BNI expected Indonesia's economic growth would remain resilient at around 4.8-5.2%YoY. Furthermore, investment growth is projected to be driven by investments in machinery & equipment and buildings & structures, in line with the development project of the Indonesian Capital City (IKN) and the completion of the national strategic program (PSN) towards the end of President Joko Widodo's administration. This economic growth range was maintained throughout 2024 and was not revised.

In terms of consumer price levels, inflation in 2024 was expected to remain within Bank Indonesia's projection range. Initially, BNI expected a higher range of inflation at 2.8–4%. However, as inflation lowered in Quarter IV – 2024, BNI revised it projection down to 1.5 – 2.5%. Amongst the causes of low inflation in 2024 were: first, the normalization of food prices after a sharp increase post El Nino in May 2024. Second, the unrestored people's purchasing power, especially in the low-middle income earner group. Third, structural problems, such as a weak formal labor market and high informality of work, underlay much weaker purchasing power. At the end of 2024, inflation closed at the lower end of the projection, which was 1.6% YoY, with core inflation of 2.3% YoY.

Furthermore, the rupiah was projected to hover at IDR15,200 - 16,200 per US dollar. The Rupiah exchange rate fluctuated throughout the year due to various factors, including the decrease in the Fed Fund Rate (FFR) in the US in the first half of 2024 and the year's various geopolitical conflicts, causing markets to gravitate towards safe-haven assets as the Dollar was strengthening against the currencies of developing countries (EMs), so BNI maintained its projection range throughout 2024. As of December 31, 2024, the average Rupiah exchange rate was IDR15,844 per US dollar.

The BI-rate interest rate projection for 2024 was 6.0-6.5% and was maintained at that level until the end of 2024. The BI rate at the beginning of the year was 6.0%. As the year went on, BI raised interest rates once in April 2024 to 6.25% and brought it back to 6.0% in September, in line with the FFR rate cut. At the end of the year, BI's policy interest rate closed at 6.0% as the pressure on the exchange rate continued in Q4 of 2024.

Considering macroeconomic and financial market movements, BNI estimated credit growth in the banking industry for 2024 at 7.0–12.0%, supported by TPF growth of 5.0–10.0%. This projection was maintained throughout 2024. The realization of credit growth in 2024 closed at 10.4% FY2024 and was in line with BNI's projection, while the realization of TPF growth was 4.5% FY2024, slightly lower than BNI's projection. BNI did not adjust the projection of TPF growth because, as of November, the realization appeared in line with its projection range (November 2024: 7.5% YoY); the below-projection realization happened once in December 2024. With such realization, the loan-to-deposit (LDR) ratio position in December 2024 was 88.6%, up from 2023 (83.8%).

Based on these external conditions, BNI felt that it needed to adjust its views of several macro assumptions and business targets for 2024, as given in the following presumptions:

Macroeconomic Variable Projections and Realization 2024

Indicator	2024 Projection	2024 Realization
Economic Growth (%)	4.8 – 5.2	5.0*
Inflation Rate (%)	1.5 – 2.5	1.6
Rupiah Exchange Rate (IDR/USD)	15.200 – 16.200	15,844
BI-7 Days Repo Rate (%)	6.0-6.5	6.0
Loan Growth (%)	7.0 – 12.0	10.4
Third Party Funds Growth (%)	5.0 – 10.0	4.5

*) Preliminary estimated figures

Source: BPS, BI, BNI Office of Chief Economist

COMPARISON BETWEEN TARGET AND REALIZATION YEAR 2024

Comparison between Target and Realization of Business Year 2024

Description	2024 Realization (IDR-billion)	2024 Target (IDR-billion)	2024 Target Achievement (%)
Loans disbursed	775,872	774,977	100.1
Deposits from Customers	805,511	856,642	94.0
Current Accounts	305,734	357,266	85.6
Savings	257,544	264,175	97.5
Deposits	242,233	235,200	103.0

In general, BNI was able to achieve its stated targets in 2024. BNI managed to deliver this strong achievement by adapting to the dynamic business environment in 2024 on healthy financial fundamentals and a competitive digital platform. Given below are some of the strategies we carried out to optimize business achievements:

- Optimization of KLM (Macroprudential Liquidity Policy) incentives in the second half to manage liquidity to reduce Cost of Fund (CoF).
- Optimization of LDR, followed by acceleration of credit growth
- Increasing CASA acquisition, especially savings, utilizing the momentum of the release of wondr by BNI, which had positive acceptance from customers.
- Optimization of data analytics to generate leads and encourage cross-selling.

Through disciplined execution of the strategies above, BNI managed to close 2024 with quite positive achievements.

Comparison between Target and Actual Profitability and Other Important Financial Ratios in 2024

Description	2024 Realization	2024 Target	2024 Target Achievement (%)
Revenue (IDR Billion)	40,480	40,014	101.2
Net Profit (IDR billion)	21,464	21,244	101.0
Return on Asset (ROA) (%)	2.5	2.4	104.2
Return on Equity (ROE) (%)	15.8	15.8	100.0
Return on Equity (ROE) - Equity Based (%)	14.2	14.2	100.0
Net Interest Margin (NIM) (%)	4.2	4.0	105.0
Operating Expenses to Operating Income (BOPO) (%)	70.0	70.3	99.6
Cost to Income Ratio (CIR) (%)	44.6	43.8	101.8

BNI's profitability realization showed quite satisfactory performance, with profitability indicators such as Net Profit, Net Interest Margin (NIM), Return on Equity (ROE), and Return on Asset (ROA) exceeding their predetermined targets. BNI's net profit in the 2024 financial year was recorded at IDR21.5 trillion, or grew by 2.7% YoY. This profit achievement was 101.0% of the target and in line with market expectations (consensus).

Target vs Realization of Capital Structure in 2024

Description	2024 Realization (%)	2024 Target (%)	2024 Target Achievement (%)
Minimum Capital Adequacy Ratio (KPMM)	21.4	20.3	105.4
Gross Non Performing Loan (NPL)	2.0	1.9	105.3

BNI's capital management strategy was reflected in its achieved capital structure target, namely the Minimum Capital Provision Obligation (KPMM) ratio, in 2024, even exceeding its predetermined target. The achievement of the Minimum Capital Provision Obligation (KPMM) target was due to BNI's increasing profitability in 2024, allowing for an organic increase in capital accumulation. BNI's success was further seen in the quality management of its earning assets. The realization of Gross Non-Performing Loans (NPL) was suppressed from the previous year at 2.14% and achieved the target. This shows BNI's strong commitment to continue to maintain the quality of its assets.

Target vs Realization in Human Resources in 2024

Description	2024 Realization	2024 Target	2024 Target Achievement (%)
Total Headcount (Employees)	27,203	27,200	100.00
Number of employees participating in training (people)	26,919	26,925	99.98
Education and Training Costs (IDR-billion)	200.98	200.98	100.00

As one of the important capital factors for the sustainability of the Bank, BNI knows that it needs competent and professional human resources (HR) to achieve all of its stated targets. That's why BNI always organizes HR education and training and see them as an investment that will help employees to achieve the expected skills, knowledge, and creativity and ultimately increase the Bank's productivity and competitiveness.

In 2024, BNI had a total of 27,203 headcount and spent IDR 201 billion for investment in education and training. The realization of education and training costs was equivalent to 3.8% of total gross salary, higher than the level set by the regulator in POJK No. 24 of 2022 of 3.5% of gross salary. The cost of education and training is an important investment for BNI in the future.

Business Continuity Information

MATTERS WOULD POTENTIALLY HAVE A SIGNIFICANT IMPACT ON THE BANK'S BUSINESS CONTINUITY IN 2024

BNI had identified some economic risk exposures ahead. The first would be regressing growth momentum if manufacturing activity did not improve. The second would be a possible economic slowdown in Indonesia's main trading partners, such as China. The third would be a deeper slowdown in the Chinese economy due to the aggressive import tariff policy the US was likely to impose on this closest economic rival of, which might slow Indonesia's economy given the latter's economic concentration with China. Furthermore, structural problems in China, such as a declining productive population, a property sector crisis, and high private debt to GDP, also had spillover effects on the country's economic growth in the medium term. The fourth would be geopolitical factors, such as relations between countries such as the Russia-Ukraine conflict, tensions with NATO, and the boiling situation in the Middle East region - including changes in leadership in major countries that could bring changes in global policy. The fifth and final risk BNI would be observant was the slowing economic growth from a structural perspective, which could be triggered by a lack of adequate employment opportunities and an increasing proportion of the informal economy.

Investment Will Remain a Drive for Economic Growth in the Medium Term

In the medium-term context, BNI had envisioned an economic growth that would be driven by higher quality investment and consumption. In its calculation, BNI spotted a need for an average increase of 6% in economic growth towards 2045 (vs. current growth of 5%) for the country to evade middle-income trap. To achieve this target, investment growth needs to increase to 8% from current average of 4% in 2021-2024. Investment would be directed to high-tech manufacturing and service sectors, including downstreaming of natural resources and agriculture (agro-downstream).

Demographic Dividend Would Be A Catalyst For Indonesia's Consumption Growth In The Medium Term

Indonesia's consumption growth, which represents 54% of the economy, was also expected to remain solid in the future along with a supportive demographic profile. Indonesia is currently experiencing the peak of the demographic dividend because the dependency ratio had hit its lowest level since >50% of the country's population then consisted of millennials (born in 1981-1996) and Generation-Z (born in 1997-2012). Indonesian consumption would also be driven by the growth of the aspiring middle class and middle class which currently accounts for 66% of the total population.

That's why BNI saw a higher potential for consumption growth in the medium term when Indonesia's GDP per capita reaches USD5000 level. The experience of other countries shows that when GDP per capita reaches that level, consumption growth has the potential to increase by 2-3% in the medium term supported by more diversified consumption. To illustrate this, he higher the GDP per capita of a country, the higher the proportion of durable goods and services consumption.

MANAGEMENT ASSESSMENT OF MATTERS WITH A POTENTIALLY SIGNIFICANT INFLUENCE ON THE BANK'S BUSINESS CONTINUITY

Overall, BNI carries out scenario analysis covering 2 (two) levels of crisis, namely liquidity and solvency. Liquidity crisis to see the impact of stress conditions on BNI's liquidity conditions as shown by liquidity indicators, namely MSR, LCR and NSFR. While, the solvency crisis is to see the impact of stress conditions on asset quality (NPL Gross and NPL Net), profitability (ROA, ROE and BOPO) and capital (KPMM and KPMM CET 1) of BNI. Each crisis condition includes scenarios of idiosyncratic crisis conditions, market-wide shock, and a combination of both.

1. Liquidity Stress Test Scenario
   The liquidity stress scenario is divided into 3 (three) scenarios, namely idiosyncratic, market wide, and a combination, which are prepared based on Bank Indonesia's granular stress test scenarios, and the LCR calculation scenario which is adjusted to BNI's internal conditions.

2. Solvency Stress Test Scenario
   The solvency aspect stress test is designed to see the impact of changes in internal factors (idiosyncratic), as well as external factors (market wide) or together, both directly and indirectly, on the Bank's solvency. These scenarios are interrelated with stress tests on indicators of asset quality, profitability and capital.

   A number of internal and external (market wide) factors for stressful conditions are seen to be independent or interrelated, influencing several bank performance variables. These changes are then transmitted into the Balance Sheet and Profit/Loss items so that they have an impact on the Bank's financial ratios. The relationship between each solvency indicator in each stress scenario will ultimately have an impact on the Minimum Capital Adequacy Ratio (KPMM).

   The stress test scenario is carried out for 3 scenarios, the first scenario is the shock condition triggered by internal factors (idiosyncratic) such as a decline in loan quality, especially in a number of quality Debtors who have shifted from current to default, then in the second scenario the trigger factors taken into account come from external factors. The third scenario is a combination of internal (idiosyncratic) trigger factors together with external (market wide).

   Some of these disturbances are transmitted into the Bank's financial performance in the form of changes in a number of variables. Changes in the quality of the loan portfolio, Net Open Position, and market prices in the securities and bond portfolio will affect the value of Risk Weighted Assets (RWA).

   Changes in income, reserve value, unrealized gains/losses and other comprehensive income of the bank will be transmitted to further influence Profit/loss for the current period which has an impact on the Bank's capital. In the end, changes in Profit/Loss and RWA will affect the Bank's minimum capital adequacy (KPMM).

ASSUMPTIONS USED BY MANAGEMENT IN CONDUCTING ASSESSMENT OF MATTERS THAT HAVE A POTENTIALLY SIGNIFICANT EFFECT ON THE BANK'S BUSINESS CONTINUITY

Several assumptions BNI considers when conducting a business continuity assessment include:

1. Liquidity Stress Test Assumptions
   The liquidity stress test assumptions for each scenario are as follows:
   a. Idiosyncratic Scenario
      Liquidity stress is triggered by a decrease in BNI's trust or reputation that can be caused by evevnts such as a decrease in BNI's rating, IT failure, the occurrence of significant internal fraud or other risk events that have an effect on decreasing public trust in BNI that can trigger large withdrawals by customers of TPF.
   b. Market-wide scenario
      Liquidity stress is triggered by a decrease in liquidity in the interbank market due to worsening overall domestic and/or global economic conditions, resulting in significant deposit withdrawals and difficulty in obtaining funding in the market, either through the liquidation of assets owned or through interbank loans.
   c. Combination Scenario
      Liquidity stress is triggered by stress resulting from a combination of idiosyncratic and market-wide events.

2. Solvency Stress Test Assumptions The solvency stress test assumptions for each scenario are as follows:
   a. Idiosyncratic Scenario
      Solvency stress is triggered by an inaccurate loan growth strategy, and accompanied by an inaccurate loan monitoring process, causing several debtors to default using MEV in the baseline scenario. The default debtors are determined based on the results of an assessment of the impact of macroeconomic conditions on BNI's loan portfolio for the Q3 2024 period. It was projected that there was a shadow NPL (collection of 1 restructured non-Covid and Pre NPL) of IDR30.27 trillion, and assumption that 25% (IDR7.56 trillion) of total shadow NPL will default.
   b. Market-wide scenario
      Solvency stress is triggered by tight global financial conditions, market financial turmoil and economic recession that will have an impact on bank solvency conditions in terms of loan risk and market risk, including:
      - Decreasing GDP growth rate
      - Increasing inflation
      - Increasing interest rates
      - Changing exchange rates
      - Worsening commodity prices
      - Other macroeconomic worsening
      - Market risk increasing due to high Government bond yields
   c. Combination Scenario
      Solvency stress is triggered by stress from idiosyncratic and market-wide conditions that influence simultaneously.

Details of Matters Arising in 2024

Throughout 2024, the Bank remained observant of the dynamic macroeconomic conditions and the spillover effects they might have on the banking business as we worked to mitigate their impacts on our 2024 performance. Given below are some of the referred impacts and how BNI overcame the issues:

Interest Rate Hike Trend

The trend of high global interest rates (higher for longer) and volatile global geopolitical & economic conditions in 2024 had an impact on the financial market in the form of tight liquidity conditions and a more limited decrease in the benchmark interest rate (BI-rate) as the Rupiah remained under pressure. Since April 2024, BI had paused rate at a high 6.25% and only decreased it once by 25 bps in September.

Impact on BNI:
The pressure on DPK (Cost of Fund) costs became heavier due to tight liquidity conditions that lead tod an increase in interest expenses and put pressure on Net Interest Margin (NIM). In response to this condition, BNI took proactive steps to optimize incentives from Bank Indonesia in the form of relaxation of the obligation to fulfill the minimum reserve requirement (GWM) in rupiah to banks that distribute credit or financing to certain sectors' a policy that took effect in June 1, 2024. The incentive package allowed the Company to have extra liquidity that can be optimized to increase credit distribution to the public while improving its third-party fund structure, and eventually improve NIM. Another strategy BNI executed was strengthening its e-channels, both retail and corporate, to strengthen transactions and increase CASA.

Weakening Purchasing Power

There were indications of weakening public purchasing power as reflected in e.g. the lower household consumption throughout 2024 that tended to remain below 5%, and has not yet to reach the pre-pandemic growth rate. The moderate growth in household consumption was largely influenced by stagnant purchasing power for the lower middle class, as also reflected by the low core inflation rate.

Impact on BNI:
Higher credit risk, especially in small loans, which had not fully recovered from the Covid-19 pandemic. As a mitigation measure, BNI adopted selective and prudent growth in the small segment with a growth orientation on the wholesale customer value chain, optimized data leads, and implemented a scoring model to maintain a fast and accurate credit assessment process based on data and statistical models while maintaining the quality of the credit disbursed.

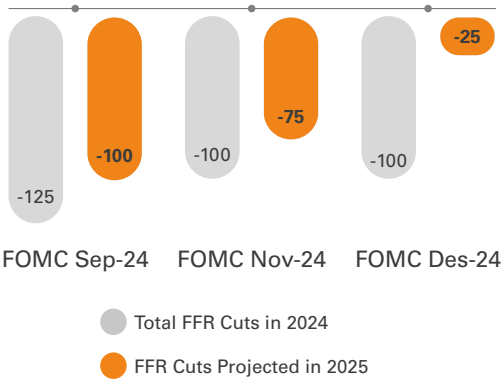
Business Prospects for 2025

Based on the assessment of macroeconomic conditions we have disclosed in the previous section, BNI had estimated that Indonesia's economic growth in 2024 would close in the range of 5% (GDP figures in Q4-2024 will not be published until February 2025). For 2025, BNI projects that Indonesia's economic growth will be in the range of 4.9%-5.4%, driven by household consumption and investments. One of the projected driving factors of higher consumption will be the effect of fiscal spending, which is more directed at domestic demand, while the main factor driving investment is capital expenditure activity from the private sector. This corresponds with historical trends, where private investment tends to increase around four quarters after the election. In addition, the formation of a cabinet and the clear direction of the new government's pro-growth and pro-consumption policies can provide greater confidence for investors.

Furthermore, BNI projects that inflation will reach the range of 2.5-3.5% in 2025, higher than 1.6% in the year in review. The first of two key factors that may cause inflation to increase in 2025 will be the effect of the increase in VAT rates for luxury goods and the implementation of excise on sweetened beverages. The second will be an increase in core inflation as household consumption improves evenly.

In terms of risk, BNI foresees that the largest source will still come from external factors, especially after the election of Donald Trump as president of the United States (US) for the 2025-2029 period. The recent election of Donald Trump will bring with it a risk of a more inward-looking, potentially more aggressive US policy direction than the 2017-2020 period when he was in office for the first time. Specifically, the Trump administration has the idea of imposing a broad import tariff of 10-20%, where specifically for China, the tariff is planned to reach 60% (higher than the import tariff to China of 15-20% in Trump's first term). Knowing that income tax cuts and continued fiscal incentives in the US will likely ensue, BNI again foresees a higher risk of US inflation in 2025, which may lead to a smaller room for lowering the US benchmark interest rate/ Fed Fund Rate (FFR) than previously estimated. As an illustration, market consensus has revised the FFR cut in 2025 by only 25bps compared to the September 2024 estimate of 100bps.

Market expectations on FFR rate cuts continue to decline



Source: Bloomberg, BNI Office of Chief Economist

Therefore, along with the strengthening of the Dollar index and the 10-year US Treasury yield >4.0%, BNI foresees the potential of the Rupiah exchange rate average to reach IDR15,000 - 16,200/USD in 2025, which may lead to a more restrictive room for Bank Indonesia to lower its benchmark interest rate. At this point, BNI estimates that the BI rate will only decrease in the range of 25bps in 2025. After weighing all the above factors, BNI projects that credit and TPF will grow at around 9.0-12.5% and 8.0-11.0%, respectively.

Macroeconomic Variable Projection, Bank Business Plan 2025-2027

	2024F	2025F	2026F	2027F
GDP Growth (% FY)	4.8 – 5.2	4.9 – 5.4	5.0 – 5.6	5.1 – 5.7
Inflation (% FY)	1.5 – 2.5	2.5 – 3.5	2.5 – 3.5	2.4 – 3.4
BI7DRRR (%)	6.00 – 6.50	5.00 – 5.75	4.25 – 5.00	4.00 – 4.75
Exchange Rate (Rp/USD, rerata)	15,200 – 16,200	15,000 – 16,200	14,800 – 15,800	14,400 – 15,300
Growth of TPF (%YoY)	5.0 – 10.0	8.0 – 11.0	9.0 – 11.0	9.0 – 12.0
Growth of Credit (%YoY)	7.0 – 12.0	9.0 – 12.5	9.0 – 13.0	9.5 – 13.0

Source: Estimation of BNI Office of Chief Economist



Performance Projections for 2025

After considering the business prospects and potential as well as macro and micro conditions as explained above, BNI has prepared a Bank Business Plan (RBB) for 2025 with several important points as shown below:

Performance Indicator	2025 Projection
Quality Balance Sheet Growth	
Credit Growth	8%-10%
DPK Growth	9%-11%
CASA Ratio	>70%
NPL Gross	< 2.0%
Credit Cost (CKPN Cost to Total Loans)	1.0%-1.1%
Profitability	
Net Interest Margin (NIM)	4.0%-4.2%
Return on Equity (ROE) - Equity Based	14.0%-15.0%
Capital Structure	
Capital Adequacy Ratio (CAR)	>20%
Dividend Policy	
Projected Dividend Payment in 2025	minimal 25%

Credit growth historically has a strong correlation with GDP growth. Hence, as the domestic economy will likely remain in fine fettle, we expect an even bigger role of banking intermediation. We are projecting that credit distribution in 2025 will continue the positive trend it has shown in resilient sectors and sectors on which the new administration has placed their priority on. Internally, BNI also has aspired to grow at a stronger 8.0%-10.0% compared to 2024 (year on year). Besides corporate and consumer segments as our main growth engines, BNI foresees opportunities for stronger credit growth in the small and medium segments.

While tight banking liquidity is likely into the first half of 2025, we still expect to see a relatively healthy growth in the third-party fund of the banking industry. However, as we plan to remain focused on third-party fund growth in retail funds and transactional funds, continue to optimize wondr by BNI app (personal banking super-app) and BNIdirect (business banking Transactional platform), as well as other digital platforms that can strengthen the customer journey, encourage the entire network of outlets and subsidiaries to increase productivity and see business potential in each region, we are projecting a growth of 9.0%-11.0% year on year (YoY) in third-party funds.

In terms asset quality, through our ongoing transformation since 2021, we have made fundamental improvements in the credit process and risk management, including the use of credit scoring and digitalization in the small segment, as well as optimizing the corporate segment value chain that will allow for healthy growth in the small and medium segments. With selective and prudent credit growth, our NPL ratio is projected to show impressive and sustainable improvements in 2025 and dip below 2.0%.

Such a strong projection of quality balance sheet growth should have positive impacts as it will improve BNI's profitability in 2025 with NIM projected to reach f 4.0%-4.2% and ROE Equity Based to reach 14.0% to 15.0%. This projection of increased profitability should then strengthen capital as reflected in the Capital Adequacy Ratio (CAR) at above 20%. This level provides BNI with the ability to meet the needs of BNI Group's business expansion and investment, as well as promising dividends without having a negative impact on capital adequacy.

With the increasingly better performance projection, we are optimistic about increasing profit in 2025, consistent with BNI's commitment to deliver optimal value for all stakeholders, especially shareholders.

In achieving the established projections, based on the Business Plan stated in the Bank Business Plan (RBB) 2025-2027 document, BNI has set 6 (six) the following strategic policies in 2025 as an effort to continue to grow in line with market demand:

1. Branch Transformation, which will involve arranging distribution networks, both conventional and digital and their integration, increasing RM productivity, sales and outlets, and streamlining processes through digitalization, and strengthening the back office.
2. Increasing Retail Savings and Deposits, as well as transaction-based Giro.
3. Pursuing healthy and sustainable growth across all segments, with a primary focus on the corporate segment and its derivatives, as well as quality consumers and wealth.
4. Improving asset quality to reduce Loan at Risk (LAR).
5. The development of excellent digital platforms, including the ongoing development of wondr by BNI and BNIdirect, and other platforms that support the customer journey.
6. Strengthening supporting factors including Human resource transformation, strengthening IT architecture, and improving cost efficiency ratios and operational excellence.

Marketing Aspect

MARKETING STRATEGY

BNI is committed to always bringing the best products and services, not only to strengthen brand image and increase market share, but also to create added value for all stakeholders anywhere and anytime. In today's era where digitalization is still growing rapidly, BNI has consistently become a leading financial institution that is agile in facing rapid market changes and needs as well as increasingly tight business competition.

In communicating its signature products and services, BNI executes an integrated marketing communication strategy and uses more digital media, both the publication of BNI as a corporation and BNI's products. The message covers a range of information, from BNI's aspiration to become a state-owned bank with global capabilities to its commitment to becoming a digital-based bank.

BNI has an aspiration to become a state-owned bank with global capabilities in that it bridges players in the business circle to the global arena. BNI cements its position overseas as a gateway for investors, diaspora, and potential customers to drive international banking performance. In addition, BNI continues to develop digital-based products and services for both the wholesale and retail segments to make a significant contribution to Indonesia's economic growth. This idea is the basis of BNI's corporate message and was emphasized at the commemoration of its 78th anniversary in 2024 with the theme "Leading a Wondrous Nation," portraying BNI's efforts to become the leading financial institution in service and performance to realize Golden Indonesia by 2045. This theme reaffirms BNI's mission of realizing a big goal: to always serve the country and become a source of pride for the Indonesian people.

In terms of digital marketing, BNI optimizes its own digital media platforms to reach a wide market segment. One way to use the media platforms is by making the best use of BNI's organic social media. According to data as of December 31, 2024, Instagram @bni46 had 1,766,438 followers. BNI Facebook had 411,835 fans, Twitter/X @BNI had 1,245,035 followers. TikTok @bni46 had respectively 521,500 current followers, and Youtube had 42,200 subscribers with more than 8,000 total posts throughout 2024, showing a high engagement rate that has made BNI's social media one of the best in the banking business sector.

BNI also ran marketing communication campaigns in conventional media, such as television, radio, OOH & public transportation, as a strategy to reach out to more audiences offline with a more massive number of viewers. In addition to conventional media campaigns, BNI also used online media platforms such as publishers, KOL/influencers, and other digital media that aim to expand the reach of the audience in all segments. For certain/specific target segments, BNI remained active in carrying out various activations through events, sponsorships, and branding in premium and strategic areas.

MARKET SHARE

Account	2024	2023	2022	Increase (Decrease) 2023-2024		
				Nominal	Percentage (%)	Trend
Based on Banking Industry Assets						
Industry*) (IDR-billion)	12,172	11,428	10,488	744	6.5	↑
BNI (IDR-billion)	1,130	1,087	1,030	43	4.0	↑
Industry Market Share (%)	9.3	9.5	9.8	-	(0.2)	
Based on Banking Industry Outstanding Loans						
Industry*) (IDR-billion)	7,657	6,966	6,275	691	9.9	↑
BNI (IDR-billion)	776	695	646	81	11.7	↑
Industry Market Share (%)	10.1	10.0	10.3	-	0.1	↑
Based on Outstanding Third Party Funds in the Banking Industry						
Industry*) (IDR-billion)	8,751	8,216	7,647	535	6.5	↑
BNI (IDR-billion)	806	811	769	(5)	(0.6)	↓
Industry Market Share (%)	9.2	9.9	10.1	-	(0.7)	
Comparison of Capital Adequacy Ratio (CAR) with the Commercial Bank Industry Average						
Industry*) (IDR-billion)	27.0	27.9	25.2	-	(0.9)	↓
BNI (IDR-billion)	21.4	22.0	19.3	-	(0.6)	↓
Comparison of Operating Expenses to Operating Income (BOPO) Ratio with the Commercial Bank Industry Average						
Industry*) (IDR-billion)	79.0	76.8	77.1	-	2.2	↑
BNI (IDR-billion)	70.0	68.4	68.6	-	1.6	↑
Comparison of Return On Asset (ROA) Ratio with Commercial Bank Industry Average						
Industry*) (IDR-billion)	2.7	2.7	2.5	-	0.0	↑
BNI (IDR-billion)	2.5	2.6	2.5	-	(0.1)	↓
Comparison of Loan to Total Deposits (LDR) with the Average of the Commercial Bank Industry						
Industry*) (IDR-billion)	87.5	84.8	82.1	-	2.7	↑
BNI (IDR-billion)	96.1	85.8	84.2	-	10.3	↑

*) Source: Indonesian Banking Statistics, Financial Services Authority, Position as of October 2024

MARKET SHARE BASED ON ASSETS

BNI has positioned itself as one of the leading banks in Indonesia in terms of assets. BNI assets in 2024 will increase to IDR1,130 trillion, with a market share value based on assets to industry of 9.3%.

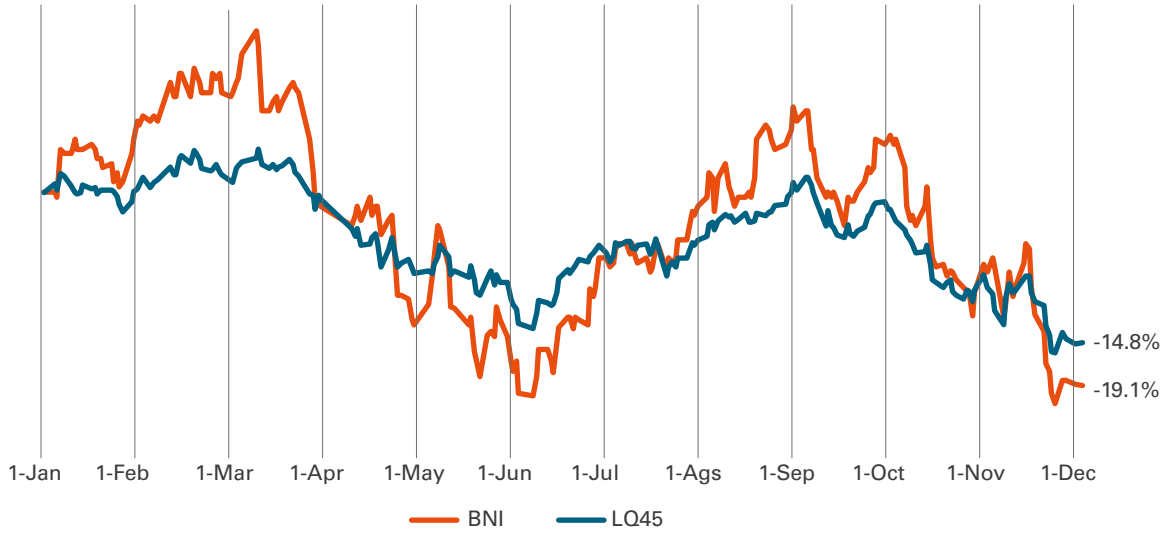
MARKET SHARE BASED ON THIRD PARTY FUNDS (TPF)

In terms of fund raising, BNI was able to maintain its position as one of the largest banks in Indonesia. In 2024, BNI's TPF reached IDR806 trillion, BNI's market share in terms of TPF was 9.2%.

MARKET SHARE BASED ON LOANS

Disbursed In line with the increase in TPF, BNI optimized its loans disbursed by paying attention to loan quality, as it reached IDR776 trillion by 2024 with a market share of 10.1%.

COMPARISON OF BNI STOCK PERFORMANCE AND LQ-45 (YTD) IN 2024



In the midst of various external challenges in 2024, BNI successfully maintained solid performance, delivering optimal returns for shareholders and strengthening market confidence. BNI's commitment to transformation, which is focused on strengthening fundamentals, was reflected in improvements to its cost of funds structure, the enhancement of its portfolio for blue-chip customers, and lower risk profiles as indicated by better NPL and Credit Cost ratios. This transformation ensures BNI's ability to sustainably increase its Return on Equity (ROE).

With the onset of a new government era, BNI is optimistic about becoming one of the frontrunners in supporting national economic growth by capitalizing on various strategic opportunities. BNI envisions significant and sustainable business growth aligned with the government's vision to boost GDP, alleviate poverty, and support various sectoral programs such as infrastructure development, energy and food security, SME empowerment, and industrial downstream, including agriculture, fisheries, and housing programs. Optimism surrounding the new government's economic priority policies, coupled with a smooth transition process, is expected to serve as a catalyst for credit growth in the banking sector.

The year 2024 marked a pivotal moment for BNI's corporate transformation. The primary focus was on strengthening the structure of third-party funds, with an emphasis on securing more robust funding from the retail segment. In this journey, BNI has embarked on two major initiatives to support its strategic vision.

The transformation of branch offices was one of the key initiatives. This new approach aims to shift the role of branch offices, which previously focused on transactions and services, towards a more sales-oriented culture. This transformation has been implemented gradually since 2024, creating a more productive work pattern that aligns with customer needs.

Another equally important initiative is digital transformation. As one of Indonesia's largest systemic banks, BNI prioritizes agile services and products through digital transformation. This commitment is reflected in various innovations launched throughout 2024. On October 9, 2024, BNI introduced BNIdirect with new capabilities as a wholesale banking platform supporting digital business transactions, equipped with a single sign-on feature for seamless access to integrated services. Earlier, on July 5, 2024, BNI also launched its latest digital banking application for the retail segment, wondr by BNI, which achieved positive performance indicators and significantly contributed to low-cost funding (CASA). Currently, 70% of BNI savings customers are users of wondr by BNI, supporting improvements in the Cost of Funds (CoF), which contribute to an increase in Net Interest Margin (NIM).

Through solid strategic initiatives and consistently improving financial performance, BNI has successfully maintained the trust of shareholders and the public. Strong fundamentals and consistent transformation have provided a positive outlook for BNI's future performance. This trust is reflected in BNI's stock performance (BBNI), which recorded positive results throughout 2024.

As of the close of trading on the Indonesia Stock Exchange on December 31, 2024, BBNI shares ended at IDR 4,350 per share, marking a year-on-year (YoY) decline of -19.1%, slightly lower than the LQ-45 index's decline of -14.8% YoY. This was influenced by global uncertainties, exchange rate fluctuations, and tight liquidity at the end of 2024. However, based on the average monthly daily stock price throughout 2024, the performance was generally better than in 2023, with an FY24 average stock price of IDR 5,239, an 11.1% increase compared to the FY23 average. This indicates that investor confidence in BNI remains strong.

These achievements were accompanied by several record-breaking milestones for the company: (1) A market capitalization value of IDR 232 trillion, the highest ever recorded in the company's history; (2) A continuous increase in market cap, supported by strong investor confidence, despite BNI recording a net foreign sell off -IDR 868.7 billion (equivalent to 0.5% of total market cap) throughout 2024 due to external factors; and (3) BBNI remains one of the issuers with high trading liquidity in 2024, with a total trading value reaching IDR 71 trillion.

BNI believes that its strong stock performance reflects the quality of its achievements throughout 2024, supported by the implementation of effective long-term strategies. Moving forward, BNI remains committed to sustainably increasing profitability and creating optimal value for all stakeholders, especially shareholders. This strategy aims to ensure that BNI continues to be one of the key pillars in supporting national economic growth.



Dividend and Distribution Policy [ACGS C.2.4]

BASIS OF DIVIDEND DISTRIBUTION POLICY

BNI implements a cash dividend payment policy referring to Article 21 paragraph (2) letter b in conjunction with Article 26 of the Bank's Articles of Association. The Articles of Association governs that in the Annual GMS, the Board of Directors shall submit a proposed use of net profit on condition that the Bank has earned a positive profit to the Annual GMS, here referred to as the amount of dividends to be distributed to the Shareholders. Dividends shall only be paid based on decisions taken in the Annual GMS. The Company shall then make cash dividend payments to entitled Shareholders no later than 30 (thirty) days after the announcement of the Summary of Minutes of the GMS which decided on the distribution of cash dividends. Further, referring to Article 70 and Article 71 of Law No. 40 of 2007 concerning Limited Liability Companies, it is stipulated that all net profit after the provision for reserves is deducted shall be distributed to shareholders as dividends, unless otherwise specified in the GMS. The use of net profit including the determination of the amount of provision for reserves is decided by the GMS. Dividends shall only be distributed if the Bank has a positive retained earnings.

BNI has had and implemented Dividend Policy Guidelines and has published them on its official website. In the Policy Guidelines, BNI's dividend distribution shall be a minimum of 25% of net profit per year in line with the BNI prospectus, the amount of which is determined at the GMS. BNI's Dividend Policy Guidelines regulate, among others:

1. Purpose of Dividend Policy.
2. Principles of Dividend Distribution.
3. The Company's considerations in distributing Dividends.
4. Type of Dividend
5. Amount of Dividend distributed
6. Approval mechanism for proposed Dividend distribution
7. Period of Dividend payment
8. Tax provisions for Dividend distribution
9. Authority of the Financial Services Authority and the Company in certain circumstances
10. Policy communication
11. Dividend Policy update period

DIVIDENDS DISTRIBUTED IN 2024 AND DIVIDEND DISTRIBUTION HISTORY

BNI's Annual GMS for the 2023 financial year held on March 4, 2024, approved the use of Net Profit for the 2023 Financial Year of Rp20,909,476,149,342,- with the following details:

1. 50% or IDR10,454,738,074,671,- or IDR280.49516984960 per share was determined as Cash Dividends. The payment was made with the following provisions:
   a. Dividends of the Republic of Indonesia's portion of IDR6,277,029,672,896.46 were deposited into the State Treasury account.
   b. Dividends for the 2023 Financial Year were paid proportionally to each Shareholder whose names were registered in the Shareholders register on the Recording Date.
   c. The Board of Directors was delegated the power and authority with the right of substitution to:
      i. Determine the schedule and procedures for distribution related to the payment of Dividends for the 2023 financial year in accordance with applicable provisions.
      ii. Deduct Dividend tax in accordance with applicable tax regulations.
      iii. Decide on other technical matters in accordance with applicable provisions.
2. 50% or IDR10,454,074,671,- was determined as Retained Earnings.

Based on this decision, the GMS has approved the payment of dividends from net profit of IDR10,454,738,074,671,- or at least IDR280,49516984960 per share that would be distributed to shareholders with the following schedule and procedures for the distribution of cash dividends for the 2023 Financial Year:

No	Description	Date
	End of Trading Period Shares With Dividend Rights (Cum Dividend)	
	• Regular and Negotiation Market	March 14, 2024
	• Cash Market	March 18, 2024
	Beginning of Stock Trading Period Without Dividend Rights (Ex Dividend)	
	• Regular and Negotiation Market	March 15, 2024
	• Cash Market	March 19, 2024
	List of Shareholders entitled to Dividends (Recording Date)	March 18, 2024
	Cash Dividend Payment Date	April 2, 2024

Description: Taking into account international best practice, the company will make payments in 2024 within 30 (thirty) days from the date of the GMS approving the use of the Company's net profit to be paid as cash dividends. GMS approving the use of the Company's net profit to be paid as cash dividends. [ACGS A.1.1]

The following details procedure for distributing cash dividends from BNI's net profit for the 2023 Fiscal Year:

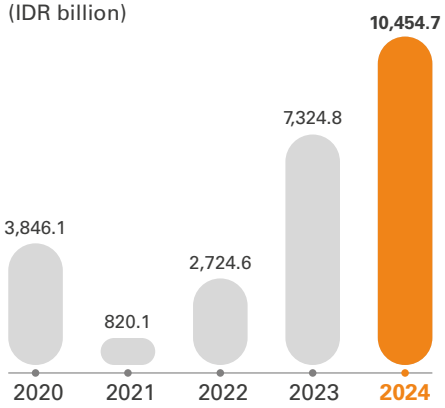
1. Cash Dividends were distributed to Shareholders whose names were registered in the Shareholders Register ("DPS") or recording date and/or shareholders in the securities sub-account at PT Kustodian Sentral Efek Indonesia ("KSEI") at the close of trading on March 18, 2024.
2. For Shareholders whose shares were included in KSEI's collective custody, cash dividend payments were made through KSEI and distributed on April 2, 2024, into the Customer Fund Account (RDN) at the securities company and/or custodian bank where the Shareholders have a securities account. Meanwhile, for Shareholders whose shares were not included in KSEI's collective custody, cash dividend payments would be transferred to the Shareholder's account.
3. The cash dividends were subject to tax in accordance with applicable tax laws and regulations.
4. Based on the applicable tax laws and regulations, the cash dividends would be exempt from taxation if received by domestic corporate taxpayer shareholders ("DN Corporate Taxpayers") and the Company did not deduct Income Tax on the cash dividends paid to the referred Domestic Corporate Taxpayers. Cash dividends received by domestic individual taxpayer shareholders ("DN Taxpayers") would be exempt from taxation as long as the dividends were invested in the territory of the Republic of Indonesia. For Domestic Taxpayers who did not meet the investment requirements as stated above, the Cash Dividends received by the person concerned would l be subject to income tax ("PPh") in accordance with the applicable laws and regulations, and the PPh must be paid by the relevant Domestic Taxpayers themselves in accordance with the provisions of Government Regulation No. 9 of 2021 concerning Tax Treatment to Support Ease of Doing Business.
5. Shareholders could obtain confirmation of dividend payments through securities companies and/or custodian banks where the Shareholders had securities accounts, then the Shareholders were required to be responsible for reporting the receipt of the said dividends including in the tax reporting in the relevant tax year in accordance with the applicable tax laws and regulations.
5. For Shareholders who were Foreign Taxpayers whose tax deductions would l use rates based on the Double Tax Avoidance Agreement ("P3B"), they had to fulfill the requirements of the Regulation of the Director General of Taxes No. PER-25/PJ/2018 concerning Procedures for Implementing the Double Tax Avoidance Agreement and submit proof of record documents or receipts of DGT/SKD that have been uploaded to the Directorate General of Taxes website to KSEI or BAE within the deadline according to KSEI regulations and provisions, and without the said documents, cash dividends paid would be subject to Article 26 Income Tax of 20%.

Distribution and payment history of dividends for the last 5 (five) years is as follows:

	Dividend Distribution Year				
	2024 (For Business Results In 2023)	2023 (For Business Results In 2022)	2022 (For Business Results In 2021)	2021 (For Business Results In 2020)	2020 (For Business Results In 2019)
Cash Dividend Distributed (IDR billion)	10,454.7	7,324.8	2,724.6	820.1	3,846.1
Dividend per Share (IDR)	280.5	196.4	146.3	44.0	206.2
Percentage of Total Dividends to Net Profit (%)	50% of net profit for the year attributable to owners of the parent entity for the 2023 fiscal year	40% of net profit for the year attributable to owners of the parent entity for the 2022 fiscal year	25% of net profit for the year attributable to owners of the parent entity for the 2021 fiscal year	25% of net profit for the year attributable to owners of the parent entity for the 2020 fiscal year	25% of net profit for the year attributable to owners of the parent entity for the 2019 fiscal year
Announcement Date	March 5, 2024	March 16, 2023	March 17, 2022	March 31, 2021	February 24, 2020
Payment Date	April 2, 2024	April 14, 2023	April 14, 2022	April 30, 2021	March 24, 2020

Development of Total Cash Dividends Distributed in the Last 5 Years

(IDR billion)



BNI's Contribution to National Development

BNI acts as a taxpayer and tax withholding/collector as its contribution to the State. BNI's biggest contribution as a taxpayer is by fulfilling its Corporate Income Tax obligations. BNI also actively contributes to withholding tax when carrying out its function as a tax with holder. BNI is always on time in terms of paying tax obligations for Corporate Income Tax, Employee Income Tax, VAT and PBB. BNI also submits tax liability documents, such as annual and monthly tax returns, as well as liability documents to regulatory agencies in a timely manner.

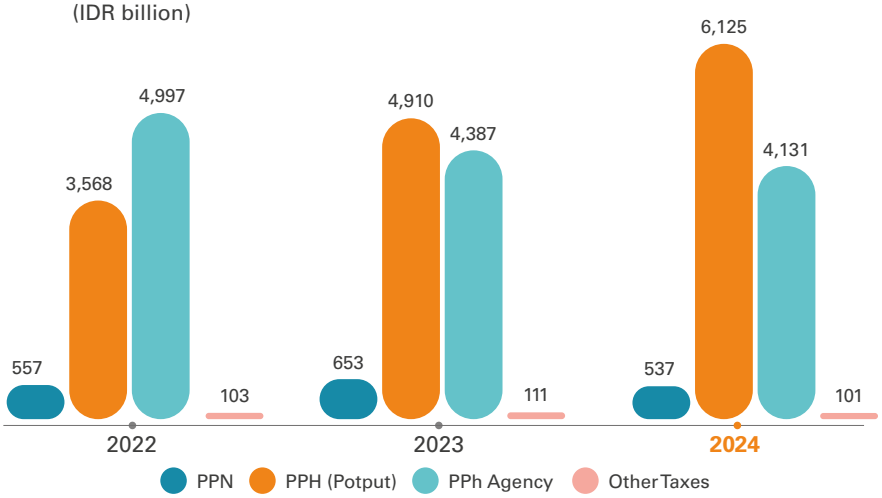
Tax Payments 2022-2024 (Bank Only)

Type of Tax	2024 (IDR-billion)	2023 (IDR-billion)	2022 (IDR-billion)	Increase (Decrease) 2023-2024			Increase (Decrease) 2022-2023		
				Nominal (IDR-billion)	Percentage (%)		Nominal (IDR-billion)	Percentage (%)	
VAT	537	653	557	(116)	(17.76)	↓	96	17.2	↑
Withholding Income Tax*)	6,125	4,910	3,568	1,215	24.75	↑	1,342	37.6	↑
Corporate Tax	4,131	4,387	4,997	(256)	(5.84)	↓	(610)	(12.2)	↓
Other Taxes	101	111	103	(10)	(9.01)	↓	8	7.8	↑
Total	10,894	10,061	9,225	833	8.3	↑	836	9.1	↑

*) Income Tax Withholding/Collection consists of Income Tax Articles 21/26, 15, 22, 23/26, and Income Tax Article 4 paragraph (2).

Development of Total Tax Payment 2020 - 2024

(IDR billion)



Information Regarding the Realization of Use of Public Offering Proceeds

PUBLIC OFFERING OF SHARE SECURITIES ON

November 25, 2010, at the Extraordinary General Shareholders' Meeting, the shareholders decided, among other matters, to increase the issued and paid-up capital through a limited public offering with preemptive right (LPO III) to shareholders for the issuance of 3,374,715,948 new Class C shares with a nominal value of IDR375 (full amount) per share. The Preemptive Rights could be traded on and off the Indonesia Stock Exchange (IDX) from December 10, 2010 to December 16, 2010, taking into account the applicable provisions in the capital market.

Total Proceeds

Proceeds generated from the Rights Issue III, the net realized value after share issuance costs were deducted was Rp10.2 trillion. Here is the proposed allocation scheme of proceeds from the Limited Public Offering III:

1. 80% for Corporate, Commercial, Small Business and Consumption loans;
2. 15% for infrastructure development in information technology, outlets, ATMs and others;
3. 5% for the development of subsidiaries, namely BNI Life, BNI Syariah, BNI Sekuritas and BNI Finance.

Fund Balance

On December 31, 2018, the proceeds from the Limited Public Offering III were Nil, as 100% of the funds obtained had been distributed.

Use Of Proceeds Realization From Limited Public Offering III	Nominal
Proceeds from Public Offering (after expenses) - nett	Rp10,216,388,163,029
Use of Proceeds Realization	
About 80% used for corporate, commercial, small business and consumer loans	as of December 31, 2014 Rp8,173,110,530,423,-
About 15% used for infrastructure development on information technology, outlets, ATMs and others	as of December 31, 2014 Rp1,532,458,224,454,-
About 5% used for the development of subsidiaries namely BNI Life, BNI Syariah, BNI Securities and BNI Finance	as of December 31, 2014 Rp510,819,408,152,-
Balance of Funds	Nil

In 2024, BNI was not obliged to submit a report on the realization of the use of funds from a public offering in accordance with OJK Regulation No. 30/POJK.04/2015 concerning Realization Report on the Use of Public Offering Proceeds.

PUBLIC OFFERING OF SUBORDINATED MTN BONDS

Subordinated Medium Term Notes (MTN)

BNI issued Subordinated Medium Term Notes (MTN) with the aim of strengthening supplementary capital (tier 2) and working capital for business development, especially lending and increasing the composition of the long-term fund association structure, in accordance with OJK Regulation No. 11/POJK.03/2016 concerning the Minimum Capital Adequacy Requirement for Commercial Banks as amended by OJK Regulation No. 34/POJK.03/2016.

This Subordinated MTN is not guaranteed by any special collateral, including not guaranteed by the Bank or its Subsidiaries, the Republic of Indonesia or other third parties and is not included in the bank guarantee program implemented by the Deposit Insurance Agency or its replacement in accordance with the applicable laws and regulations and follows the provisions in article 19 paragraph (1) letter f in accordance with OJK Regulation No. 11/POJK.03/2016, as amended by OJK Regulation No. 34/POJK.03/2016 and is a subordinated Bank obligation, in accordance with the provisions of the Subordinated MTN issuance agreement. The rights of Subordinated MTN holders are junior to the rights of other creditors.

Information about the Subordinated MTN Offered

Subordinated MTN were issued in the amount of IDR100,000,000,000.00 with a coupon payment period of 8% p.a and every 3 months (quarterly), based on the interest calculation of 30/360 with a tenor of 5 (five) years.

Name	Subordinated Medium Term Notes I BNI - 2018
Principal amount	IDR100,000,000,000
Bid Price	100.00% from Subordinated MTN principal value
Tenor	5 years from date of issue
Coupon Rate	8.00% per annum
Type of Interest Rate	Fixed
Interest Payment Periode	Quarterly
First Interest Payment Date	November 10, 2018
Collateral	This Subordinated MTN is not guaranteed by any special collateral, including not guaranteed by the company or subsidiaries, the Republic of Indonesia or other third parties, and is not included in the bank guarantee program in the deposit insurance agency, in accordance with applicable laws and regulations, and following the provisions in Article 19 Paragraph (1) point f in POJK No. 11/POJK.03/2016 as amended by the Financial Services Authority Regulation No. 34/POJK.03/2016 and is a subordinated liability of the Company, in accordance with the provisions of the Subordinate MTN issuance agreement. The rights of Subordinated MTN holders are junior to the rights of other corporate creditors at the time of liquidation in accordance with the applicable laws and regulations.
Securities Rating	idAA (double A flat) from PT Pemeringkat Efek Indonesia (Pefindo)

Purpose of Use of Subordinated MTN Funds

The issuance of the Subordinated MTN aims to comply with OJK Regulation No. 14/POJK.03/2017 article 24 and article 37 concerning the Recovery Plan, in which systemic banks are required to have capital characteristics debt notes by December 31, 2018 at the latest.

Subordinated MTN Fund Balance

As of December 31, 2024, the Subordinated MTN balance was 0 (already paid off).

Subordinated MTN Interest Payment Schedule

The interest rate of 8% per year was paid periodically every 3 (three) months with the following schedule:

Subordinated MTN Interest Payments

Interest No.	Date of Interest Payment	Interest (%)
1	November 10, 2018	8.0
2	February 10, 2019	8.0
3	May 10, 2019	8.0
4	August 10, 2019	8.0
5	November 10, 2019	8.0
6	February 10, 2020	8.0
7	May 10, 2020	8.0
8	August, 10 2020	8.0
9	November 10, 2020	8.0
10	February 10, 2021	8.0

Interest No.	Date of Interest Payment	Interest (%)
11	May 10, 2021	8.0
12	August 10, 2021	8.0
13	November 10, 2021	8.0
14	February 10, 2022	8.0
15	May 10, 2022	8.0
16	August 10, 2022	8.0
17	November 10, 2022	8.0
18	February 10, 2023	8.0
19	May 10, 2023	8.0
20	August 10, 2023	8.0

Tier II Capital Bond 2021

BNI issues debt instruments with capital characteristics in the form of Tier II Capital Bonds which are listed on the Singapore Exchange (SGX Listing) with a principal amount of USD500,000,000.00 with a write down feature and can be calculated as a Tier II capital component through OJK letter No. S-64/PB.31/2021 dated March 31, 2021. The issuance of the Tier II Capital Bond is one of BNI's strategies in increasing bank capital through Tier 2 Capital.

Tier II Capital Bonds are offered with a fixed interest rate of 3.75% p.a. for term of 5 (five) years. Acting as supporting institutions and professions for the issuance of Tier II Capital Bonds were HSBC and Citi Group. The legal consultants used were Ginting & Reksodiputro and Allen & Overy, and HSBC acting as Trustees and Paying Agents. The bonds have received a rating on long-term debt securities from Fitch Rating with a BB rating, and a Moody's Rating of Ba2.

Description of Tier II Capital Bonds Offered

Tier II Capital Bonds issued for IDR500,000,000.00 have a coupon payment period of 3,75% p.a every 6 months (semi-annually), with an interest calculation basis of 30/360 with a tenor of 5 years.

Name	Tier II Capital Bond 2021
Principal Amount	USD500,000,000.00
Bid price	100.0% of principal
Time period	5 years from the date of issuance
Interest Rate	3.75% per year
Type of Interest Rate	Fixed
Interest Payment Period	Half Yearly
First Interest Payment Date	September 30, 2021
Loss Absorption	Permanent write-down (partial is allowed) as determined by the issuer and with the approval of FSA
Securities Rating	Fitch Rating of BB Moody's Rating of Ba2.

Purpose of Funds Use from Tier II Capital Bonds

The issuance of Tier II Capital Bonds aims to increase Bank capital through Tier II Capital, for general funding needs and to increase long-term funding.

Tier II Capital Bond Fund Balance

As of December 31, 2024, the remaining balance of funds from the Tier II Capital Bond is Rp8,046 billion or in other words, 100% of the funds obtained have been disbursed.

Tier II Capital Bond Interest Payment Schedule

The interest rate is 3.75% per annum which is paid periodically every 6 months with the following schedule:

Tier II Capital Bond Interest Payments

Interest No.	Date of Bond Interest Payment	Interest (%)
1	September 30, 2021	3.75%
2	March 30, 2022	3.75%
3	September 30, 2023	3.75%
4	March 30, 2023	3.75%
5	September 30, 2024	3.75%
6	March 30, 2024	3.75%
7	September 30, 2024	3.75%
8	March 30, 2025	3.75%
9	September 30, 2025	3.75%
10	March 30, 2025	3.75%

Additional Tier I Capital Bond 2021

BNI issues debt instruments with capital characteristics in the form of Additional Tier I Capital Bonds which were registered on the Singapore Exchange (SGX Listing) with a principal amount of USD600,000,000.00 which has a write down feature and can be counted as a Tier I capital component through OJK letter No S-210/PB.31/2021 September 30, 2021.

The issuance of the Additional Tier I Capital Bond aims to increase Tier I Capital, general funding, and improve the structure of long-term funds. Additional Tier I Capital Bonds are offered with a fixed interest rate of 4.30% p.a. perpetual timeframe (no maturity) with a call option after 5.5 (five and a half) years. Acting as supporting institutions and professionals in the issuance of Additional Tier I Capital Bonds were BNI Sekuritas, JP Morgan and UBS. The legal consultants used were Hadiputranto, Hadinoto & Partners and Baker McKenzie, and HSBC as Trustee and Paying Agent. The bonds have received a rating on long- term debt securities from Moody's Rating, of Ba3.

Information on the Additional Tier I Capital Bonds Offered

Additional Tier I Capital Bonds issued for USD600,000,000.00 with a coupon payment period of 4.3% p.a every 6 months (semester), with an interest calculation basis of 30/360 with a tenor of 5.5 years until the date of the call option.

Name	Additional Tier I Capital Bond BNI of 2021
Principal amount	USD600,000,000.00
Bid Price	100.0% of principal
Tenor	Perpetual, Non Callable 5.5 years from the date of issue
Coupon Rate	4.3% per year
Type of Interest Rate	Fixed
Interest Payment Periode	Half yearly
First Interest Payment Date	March 24, 2022
Loss Absorption	Permanent write-down (full or partial) if the Point of Non-Viability condition is determined by FSA.
Securities Rating	Moody's Rating Ba3.

Purpose of Use of Additional Tier I Capital Bond Funds

The issuance of Additional Tier I Capital Bonds aims to increase the Bank's capital through Tier II Capital, for general funding needs and to increase long-term funding.

Additional Tier I Capital Bond Fund Balance

As of December 31, 2024, the remaining balance of funds from Additional Tier I Capital Bond is Rp9,653 billion or in other words, 100% of the funds obtained have been disbursed.

Additional Tier I Capital Bond Interest Payment Schedule

The interest rate is 4.30% per annum paid every 6 months with the following schedule:

Tier I Capital Bond Interest Payments

Interest No.	Date of Bond Interest Payment	Interest (%)
1	March 24, 2022	4.3%
2	September 24, 2023	4.3%
3	March 24, 2023	4.3%
4	September 24, 2024	4.3%
5	March 24, 2024	4.3%
6	September 24, 2025	4.3%
7	March 24, 2025	4.3%
8	September 24, 2026	4.3%
9	March 24, 2026	4.3%
10	September 24, 2026	4.3%
11.	March 24, 2027	4.3%

Environmentally Friendly Bonds (Green Bond) I

BNI received an effective statement from OJK through letter No. S-93/D.04/2022 on June 10, 2022 to issue PT Bank Negara Indonesia (Persero) Tbk 2022 environmentally Friendly Green Bond I. Green Bonds were issued with a value of IDR5,000,000,000,000.00 in 2 (two) series, series A and B, with consecutive tenors of 3 years and 5 years, and consecutive coupons of 6.35% and 6.85%. The Green Bonds were issued on June 21, 2022 and listed on the Indonesia Stock Exchange (IDX) on June 22, 2022. BNI has obtained an idAAA rating on Green Bond from PT Pemeringkat Efek Indonesia (PEFINDO) and a Second Party Opinion provided by Sustainalytics.

Name Obligasi	Environmentally Friendly Bonds (Green Bond) I of PT Bank Negara Indonesia (Persero) Tbk in 2022
Bond Principal Amount	IDR5,000,000,000,000.00
Bid price	100.00% of the principal amount of the Bonds
Time period	Series A : 3 (three) years from the date of issuance Series B : 5 (five) years from the date of issuance
Overbooking Unit	IDR1 or multiples thereof
Unit/Trade	IDR5,000,000 or multiples thereof
Bond Interest Rate	Series A : 6.35% per annum Series B : 6.85% per annum
Type of Interest Rate	Fixed
Interest Payment Period	Quarterly
First Interest Payment Date	September 21, 2022
Collateral	This bond is not guaranteed by a special guarantee, but is guaranteed by all of the Bank's assets, both movable and immovable property, both existing and those that will exist in the future as collateral for the Bondholders in accordance with the provisions in articles 1131 and 1132 of the Indonesian Civil Code. The rights of the Bondholders are paripassu without preferential rights with other creditor rights, both current and future, except for creditor rights that are specifically guaranteed by the Bank's assets, both existing and future.
Securities Rating	idAAA (triple A) from Pefindo
Sinking Fund	The Bank does not provide a sinking fund for Bond Principal redemption funds with the consideration of optimizing the use of emission proceeds in accordance with the purpose of the planned use of emission funds.
Buy Back	This Green Bond has an buy back option based on the terms and conditions of the Trustee Agreement.
Trustee	PT Bank Mandiri (Persero) Tbk was appointed as the Trustee in the issuance of this Bond in accordance with the provisions contained in the Trustee Agreement

Plan of Use from Public Offering of Environmentally Friendly Bonds (Green Bond) I Funds

The proceeds from the issuance of the Green Bonds after deducting issuing costs, will all be used by BNI to finance and refinance projects in the Environmentally Friendly Business Activities category (KUBL), namely projects related to renewable energy, energy efficiency, processing waste into energy. and waste management, sustainable use of natural resources and land use, conservation of land and aquatic biodiversity, environmentally friendly transportation, sustainable management of water and wastewater, climate change adaptation, environmentally sound buildings, and sustainable agriculture, taking into account OJK Regulation No. 60/POJK.04/2017 concerning Issuance and Requirements for Environmentally Friendly (Green Bond) Debt Securities.

Information on Changes in Use of Funds

During 2024 there were no changes in the use of funds.

Use of Proceeds from Bond Public Offering Realization

Realization of Use of Proceeds from the Public Offering of Environmentally Friendly Bonds, (Green Bond) I PT Bank Negara Indonesia (Persero)Tbk.

Use of Funds Realization	Effective Date	Realized Public Offering Results			Realized Public Offering Results		Use of Funds Realization		Remaining Funds from Public Offering (IDR-billion)
		Total Public Offering Results (IDR-billion)	Total Public Offering Results (IDR-billion)	Net Yield (IDR-billion)	Financing or refinacing of projects in the KUBL category*) (IDR-billion)	Total (IDR-billion	Financing or refinacing of projects in the KUBL category*) (IDR-billion)	Total (IDR-billion	
Environmentally Friendly Bonds (Green Bond) I PT Bank Negara Indonesia (Persero)Tbk 2022	June 10, 2022	5,000	16	4,929	4,929	4,929	4,929	4,929	-

*) KUBL Category (Environmentally Friendly Business Activities): projects relate to renewable energy, energy efficiency, processing waste into energy and waste management, sustainable use of natural resources and land use, land and water biodiversity conservation, environmentally friendly transportation, sustainable water and wastewater management, climate change adaptation, environmentally sound buildings, and sustainable agriculture, and take into account Financial Services Authority Regulation Number 60/POJK.04/2017 concerning Issuance and Requirements for Environmentally Sound Debt Securities (Green Bond).

Fund Balance

As of December 31, 2024 the remaining balance of funds from the Green Bond is IDR4,929 billion or in other words, 100% of the funds obtained have been disbursed.

Interest Payment Schedule

Green Bond Payments				
Interest No	Series A		Series B	
	Date of Interest Payment	Interest (%)	Date of Interest Payment	Interest (%)
1	September 21, 2022	6.35%	September 21, 2022	6.85%
2	December 21, 2022	6.35%	December 21, 2022	6.85%
3	March 21, 2023	6.35%	March 21, 2023	6.85%
4	June 21, 2023	6.35%	June 21, 2023	6.85%
5	September 21, 2023	6.35%	September 21, 2023	6.85%
6	December 21, 2023	6.35%	December 21, 2023	6.85%
7	March 21, 2024	6.35%	March 21, 2024	6.85%
8	June 21, 2024	6.35%	June 21, 2024	6.85%
9	September 21, 2024	6.35%	September 21, 2024	6.85%
10	December 21, 2024	6.35%	December 21, 2024	6.85%
11	March 21, 2025	6.35%	March 21, 2025	6.85%
12	June 21, 2025	6.35%	June 21, 2026	6.85%

Green Bond Payments				
Interest No	Series A		Series B	
	Date of Interest Payment	Interest (%)	Date of Interest Payment	Interest (%)
13			September 21, 2025	6.85%
14			December 21, 2025	6.85%
15			March 21, 2026	6.85%
16			June 21, 2026	6.85%
17			September, 21 2026	6.85%
18			December 21, 2026	6.85%
19			March 21, 2027	6.85%
20			June 21, 2027	6.85%



Negotiable Certificate of Deposit (NCD) Rupiah & Foreign Currencies

BNI issued Rupiah scripless Negotiable Certificates of Deposit (NCD) Rupiah and Forex aimed at strengthening the liquidity and structure and composition of Rupiah funding as follows:

1. In semester I 2016, BNI issued its first scripless Rupiah NCDs for IDR3.0 trillion in 6 series of tenors (6 months to 3 years.)
2. In semester II 2016, BNI issued another scripless Rupiah NCDs for IDR2.2 trillion, from an original target of IDR1 trillion (oversubscribed). This oversubscribe shows the high level of investor trust and interest in BNI.
3. In semester I 2017, BNI issued scripless Rupiah NCDs for IDR2.7 trillion.
4. In semester I 2019, BNI issued scripless Rupiah NCDs twice with a total issuance of IDR950 billion (NCD IDR I BNI 2019) and IDR1 trillion (NCD IDR II BNI 2019)
5. In semester II 2019, BNI again issued scripless Rupiah NCDs for IDR2.39 trillion.
6. In semester I 2020, BNI issued scripless Rupiah NCDs for IDR1.39 trillion.
7. In Semester II 2022, BNI issued scripless Rupiah NCDs for IDR2.5 trillion and scripless USD NCDs for USD 31.5 million (IDR500 billion).

Issuance Phase	Date	Currency	Principal (IDR Billion)	Amount (IDR Billion)	Average Rate (%)
1	June 16, 2016	IDR	3,023	2,598	8.20%
2	September 27, 2016	IDR	2,200	1,877	6.70%
3	March 10, 2017	IDR	2,700	2,483	7.00%
4	March 28, 2019	IDR	1,000	950	7.70%
5	June 28, 2019	IDR	1,000	1,000	7.55%
6	September 25, 2019	IDR	2,390	2,232	6.61%
7	May 12, 2020	IDR	1,390	611.6	5.60%
8	December 8, 2022	IDR	2,500	2,390	6.04%
9	December 8, 2022	USD	500	489	4.25%

Material Information Regarding Corporate Action, Investments, Expansions, Divestments, Business Mergers, Acquisitions, and/or Restructuring

MATERIAL INFORMATION REGARDING CORPORATE ACTION

Throughout 2024, BNI did not carry out any corporate action plans such as asset sales, debt issuance, and capital injections.

MATERIAL INFORMATION REGARDING THE ISSUANCE OF DEBT SECURITIES

1.	Date of Event	:	April 5, 2024 and April 8, 2024
2.	Type of Material Information or Facts	:	Other Material Information or Facts: Issuance of BNI Senior Debt Notes 2024 amounting to USD500,000,000 (five hundred million United States Dollars) and listed on the Singapore Stock Exchange.
3.	Description of Material Information or Facts	:	On April 5, 2024, the Company issued BNI Senior Debt Notes 2024 amounting to USD 500,000,000 (five hundred million United States Dollars) with an annual interest rate of 5.28% (five point two eight percent). The issuance was conducted in accordance with Regulation S ("Reg S") under the U.S. Securities Act and was subsequently registered on the Singapore Stock Exchange on April 8, 2024. The BNI Senior Debt Notes 2024 are issued under the Euro Medium Term Note (EMTN) Program, which was established on May 6, 2020, and subsequently renewed on March 22, 2021, and March 26, 2024. Under the EMTN Program, the Company is authorized to issue debt securities in tranches, with a maximum principal amount of USD 2,000,000,000 (two billion United States Dollars). The proceeds from the issuance of BNI Senior Debt Notes 2024, totaling USD 500,000,000 with a five-year term, will be allocated for the Company's general financing and funding needs.
4.	Impact of the event, information or material facts on the operational activities, law, financial condition, or business continuity of the Issuer or Public Company.	:	The establishment and issuance plan of BNI Senior Debt Notes 2024 is expected to have a positive impact on the Company's financial position.
5.	Other information	:	The offering of BNI Senior Debt Notes 2024 does not constitute a public offering in Indonesia as defined under Law No. 8 of 1995 on Capital Markets, as amended by Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector, along with its implementing regulations. Furthermore, the planned issuance of BNI Senior Debt Notes 2024 represents less than 20% of the Company's equity, based on the audited Financial Statements as of December 31, 2023, prepared by KAP Tanudiredja, Wibisana, Rintis & of the supplementary capital component (a member firm of the PricewaterhouseCoopers network) as an independent auditor. As a result, the issuance does not qualify as a Material Transaction under OJK Regulation No. 17/POJK.04/2020 on Material Transactions and Changes in Business Activities.

MATERIAL INFORMATION REGARDING INVESTMENT

On September 26, 2024, the Company effectively completed a capital participation in PT Kliring Penjaminan Efek Indonesia ("KPEI"), an entity serving as the Clearing and Guarantee Institution for the Indonesian Capital Market. The investment amounted to IDR 20,000,000,000 (twenty billion Rupiah) or 2,500 shares. This capital participation was intended to support the development of a Central Counterparty for Over-The-Counter Interest Rate and Exchange Rate Derivative Transactions ("CCP-SBNT"), in alignment with the implementation of Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector, as well as Bank Indonesia Regulation No. 6 of 2024 on the Money Market and Foreign Exchange Market. As a result of this investment, the Company now holds a 1.11% ownership stake in KPEI. Capital participation was also carried out by Bank Indonesia together with 7 other commercial banks.

This capital participation was part of a broader initiative, with Bank Indonesia and seven other commercial banks also making similar investments. Prior to executing this investment, the Company obtained all necessary approvals and permits and complied with the applicable regulatory requirements, including securing investment approval from the relevant authorities and regulators.

MATERIAL INFORMATION REGARDING EXPANSION, DIVESTMENT, BUSINESS MERGER, ACQUISITION, AND DEBT/ CAPITAL RESTRUCTURING

Throughout 2024, the Company did not make any expansion, divestment, business merger, acquisition, or debt/capital restructuring activities. Hence no information about the objectives, transaction values, and sources of funds related to these activities is available. [ACGS A.3.1]

Information on Material Transactions That Contain Conflicts of Interest and/or Transactions with Affiliated/Related Parties

To safeguard the interests of shareholders and stakeholders, all material transactions, particularly those involving potential conflicts of interest and/or affiliated transactions, are conducted in accordance with proper procedures. [ACGS A.8.1]

The BNI Board of Directors ensures that material transactions and affiliated/related party transactions are conducted in line with generally accepted business practices. The Board of Commissioners and the Audit Committee also play a critical role in overseeing that these transactions adhere to such practices and are executed through proper procedures. This involves ensuring compliance with the arm's length principle and appointing an independent party to assess the fairness of the transaction value. [ACGS A.3.1, A.8.1, A.9.1]

Material transactions and affiliated/related party transactions are conducted in compliance with applicable laws and regulations, including the Indonesian Financial Accounting Standards (PSAK), OJK Regulation No. 42/POJK.04/2020 on Affiliated Transactions and Conflict of Interest Transactions ("POJK 42"), and OJK Regulation No. 32/POJK.03/2018 concerning the Maximum Credit Limit (BMPK) for Commercial Banks.

MATERIAL TRANSACTIONS AND TRANSACTIONS THAT CONTAIN CONFLICTS OF INTEREST

Pursuant to POJK 42, for affiliated/related party transactions that meet the material transaction value thresholds, the Company requires prior approval from independent or minority shareholders (disinterested shareholders). During the General Meeting of Shareholders (GMS), the transaction must receive an affirmative vote from more than 50% of disinterested shareholders. Controlling shareholders with a conflict of interest are considered to have approved the decision made by the minority shareholders. [ACGS A.9.2]

During 2024, there were no material transactions or transactions that contain conflicts of interest that required independent/minority shareholder approval at the GMS.

AFFILIATE TRANSACTIONS WITH AFFILIATED/RELATED PARTIES

Definition of Affiliated/Related Parties

Affiliation is defined as:

1. Family relationship by marriage and descent to the second degree, both horizontally and vertically.
2. Relationship between the party and the employee, director, or commissioner of the party.
3. Relationship between 2 (two) companies in which there are 1 (one) or more members of the same board of directors or board of commissioners.
4. Relationship between the company and the party, either directly or indirectly, controlling or controlled by the company.
5. Relationship between 2 (two) companies that are controlled, either directly or indirectly, by the same party.
6. Relationship between the company and its major shareholders.

Company Policy concerning Review Mechanism for Transactions and Compliance with Related Regulations and Provisions

BNI conducts transactions with affiliated/related parties in accordance with PSAK 7 concerning "Related Party Disclosures" and Financial Services Authority Regulation No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions ("POJK 42"), and Financial Services Authority Regulation No. 38/POJK.03/2019 concerning the Legal Lending Limit and Provision of Large Funds for Commercial Banks.

Based on POJK 42, AffiliatedTransactions are defined as any activities and/or transactions carried out by a public company or a controlling company with Affiliates that are a public company or are Affiliated to members of the Board of Directors, members of the Board of Commissioners, the Majority and

Controlling Shareholders, including all activities and/or transactions conducted by public companies or controlling companies for the benefit of affiliates of public companies or affiliates of members of the Board of Directors, and the Board of Commissioners, and the Majority and Controlling Shareholders.

All affiliate transactions at BNI are conducted based on adequate procedures to ensure that affiliate transactions are carried out in accordance with generally accepted business practices.

Statement of Board of Directors and Board of Commissioners on Affiliated Transactions

In carrying out affiliate transactions, BNI always adheres to POJK 42. By referring to the regulation, the Board of Directors states that each affiliate transaction has gone through adequate procedures to ensure that affiliate transactions are carried out in accordance with generally accepted business practices, including by fulfilling the arm's-length principle, as well as compliance with Article 3 of POJK 42. The Board of Commissioners and the Audit Committee play a role in carrying out adequate procedures to ensure that affiliate transactions are carried out in accordance with generally accepted business practices, including by fulfilling the arm's-length principle. [ACGS A.8.1, A.9.1]

The Board of Commissioners, in collaboration with the Board of Directors, continually develops, adopts, discloses, and refines policies regarding affiliated/related transactions, ensuring a robust process for approving, reviewing, and monitoring such transactions, particularly those involving potential conflicts of interest. This includes the formation and/or involvement of the Audit Committee. The BNI Audit Committee is responsible for reviewing and providing recommendations on significant affiliated/related party transactions, presenting these to the Board of Commissioners to assess whether the transaction serves the best interests of the Company. If deemed appropriate, the Audit Committee ensures that the terms of the transaction are fair and reasonable. [ACGS C.4.1]

AFFILIATE/RELATED TRANSACTION DISCLOSURE

POJK 42 outlines the procedural requirements for Public Companies, including exceptions, in the execution of Affiliate Transactions. In accordance with Articles 8 and 9 of POJK 42, Affiliate Transactions that involve business activities aimed at generating income and are conducted routinely, repeatedly, and/or continuously must be disclosed in the annual report or annual financial statement of the Public Company.

In 2024, the affiliate/related transactions conducted by BNI to generate business income and carried out routinely, repeatedly, and/or continuously are as follows:

Disclosure of Affiliated/Related Parties [ACGS C.4.2]

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
Social Security Agency (BPJS) Health	Loans provided	Control through the Government of the Republic of Indonesia	180,259,621
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	5,026,165,185
Social Security Agency (BPJS) Employment	Issued securities	Control through the Government of the Republic of Indonesia	629,937,505,333
Ministry of Finance of the Republic of Indonesia	Securities	Control through the Government of the Republic of Indonesia	1,675,069,413,441
	Issued securities	Control through the Government of the Republic of Indonesia	619,938,497,312
	Government bonds	Control through the Government of the Republic of Indonesia	126,661,172,018,732
	Borrowings	Control through the Government of the Republic of Indonesia	48,557,045,663
	Loans provided	Control through the Government of the Republic of Indonesia	36,774,521,685,704
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	5,841,173,354,281

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
Perum BULOG and Subsidiaries	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	398,922,121,141
	Loans provided	Control through the Government of the Republic of Indonesia	19,742,437,677,134
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	155,217,734,949
Perum Percetakan Uang Republik Indonesia ('Perum Peruri') and Subsidiaries	Bank guarantee	Control through the Government of the Republic of Indonesia	89,931,586,172
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	21,664,626,944
	Loans provided	Control through the Government of the Republic of Indonesia	124,997,642,360
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	1,710,762,283
Perum Perumnas	Bank guarantee	Control through the Government of the Republic of Indonesia	600,708,256
	Loans provided	Control through the Government of the Republic of Indonesia	127,875,981,917
PT Adhi Karya (Persero) Tbk and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	49,917,012,084
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	104,616,414,732
	Acceptance receivables	Control through the Government of the Republic of Indonesia	59,768,561,562
	Bank guarantee	Control through the Government of the Republic of Indonesia	1,648,980,340,583
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	11,051,002,535
	Loans provided	Control through the Government of the Republic of Indonesia	1,667,598,621,058
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	965,677,837
PT Amarta Karya (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	2,402,903,050
PT Asuransi Jiwasraya (Persero)	Loans provided	Control through the Government of the Republic of Indonesia	44,274,139
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	269,712,660
PT Asuransi Sosial Angkatan Bersenjata Republik Indonesia (Persero)	Issued securities	Control through the Government of the Republic of Indonesia	39,996,032,084
PT Aviasi Pariwisata Indonesia (Persero) dan Entitas Anak	Bank guarantee	Control through the Government of the Republic of Indonesia	45,025,133,436
	Loans provided	Control through the Government of the Republic of Indonesia	2,065,008,106,641
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	2,943,963,147
PT Bahana Pembinaan Usaha Indonesia (Persero) dan Entitas Anak	Securities	Control through the Government of the Republic of Indonesia	1,980,974,733,644
	Issued securities	Control through the Government of the Republic of Indonesia	85,975,640,880
	Bank guarantee	Control through the Government of the Republic of Indonesia	38,019,424,023
	Loans provided	Control through the Government of the Republic of Indonesia	631,452,026,818
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	3,578,754,283

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
PT Bank Mandiri (Persero) Tbk and Subsidiaries	Demand deposits with other banks	Control through the Government of the Republic of Indonesia	40,262,568,346
	Placements with other banks and Bank Indonesia	Control through the Government of the Republic of Indonesia	1,097,013,340,003
	Securities	Control through the Government of the Republic of Indonesia	1,278,725,065,288
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	668,800,314,797
	Acceptance receivables	Control through the Government of the Republic of Indonesia	41,508,981,201
	Derivative receivables	Control through the Government of the Republic of Indonesia	57,994,021,775
	Investments in associate entities and equity participation	Control through the Government of the Republic of Indonesia	12,748,126,558,168
	Issued securities	Control through the Government of the Republic of Indonesia	55,982,782,107
	Borrowings	Control through the Government of the Republic of Indonesia	1,525,653,953,451
	Subordinated securities	Control through the Government of the Republic of Indonesia	3,218,478,599
	Derivative Payables	Control through the Government of the Republic of Indonesia	37,180,391,561
	Acceptances Payables	Control through the Government of the Republic of Indonesia	834,267,224,219
	Bank guarantee	Control through the Government of the Republic of Indonesia	1,942,938,879,652
PT Bank Rakyat Indonesia (Persero) Tbk and Subsidiaries	Demand deposits with other banks	Control through the Government of the Republic of Indonesia	2,357,286,359
	Placements with other banks and Bank Indonesia	Control through the Government of the Republic of Indonesia	50,000,000,000
	Securities	Control through the Government of the Republic of Indonesia	689,191,896,376
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	203,484,517,318
	Derivative receivables	Control through the Government of the Republic of Indonesia	31,688,802,667
	Issued securities	Control through the Government of the Republic of Indonesia	352,030,375,559
	Derivative payables	Control through the Government of the Republic of Indonesia	20,802,514,529
	Bank guarantee	Control through the Government of the Republic of Indonesia	96,802,421,825
	Loans provided	Control through the Government of the Republic of Indonesia	7,821,687,896,386
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	902,904,988,272
PT Bank Tabungan Negara (Persero) Tbk	Demand deposits with other banks	Control through the Government of the Republic of Indonesia	354,460,010
	Placements with other banks and Bank Indonesia	Control through the Government of the Republic of Indonesia	473,177,550,251
	Securities	Control through the Government of the Republic of Indonesia	24,486,656,740
	Acceptance receivables	Control through the Government of the Republic of Indonesia	1,000,000

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
PT Barata Indonesia (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	1,649,520,662
PT Bio Farma (Persero)	Loans provided	Control through the Government of the Republic of Indonesia	2,171,366,376,651
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	1,094,969,983
	Bank guarantee	Control through the Government of the Republic of Indonesia	74,400,000
PT Biro Klasifikasi Indonesia (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	164,897,120,199
PT Brantas Abipraya (Persero)	Export bills and other receivables	Control through the Government of the Republic of Indonesia	1,905,956,488,564
	Acceptance receivables	Control through the Government of the Republic of Indonesia	38,703,348,125
	Bank guarantee	Control through the Government of the Republic of Indonesia	551,717,728,630
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	10,256,091,828
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	25,000,000,000
PT Danareksa (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	2,758,638,784,000
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	321,559,467,813
	Acceptance receivables	Control through the Government of the Republic of Indonesia	146,703,744,656
	Bank guarantee	Control through the Government of the Republic of Indonesia	1,549,759,701,688
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	91,520,942,167
	Loans provided	Control through the Government of the Republic of Indonesia	370,052,407,864
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	1,276,863,209
PT Djakarta Lloyd (Persero) and Subsidiaries	Loans provided	Control through the Government of the Republic of Indonesia	110,792,997,226
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	21,365,623
PT Garuda Indonesia (Persero) Tbk and Subsidiaries	Derivative receivables	Control through the Government of the Republic of Indonesia	390,748,133
	Loans provided	Control through the Government of the Republic of Indonesia	3,695,997,525,163
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	446,520,016
	Bank guarantee	Control through the Government of the Republic of Indonesia	196,250,000
PT Hutama Karya (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	386,870,400,000
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	993,367,141,919
	Acceptance receivables	Control through the Government of the Republic of Indonesia	445,931,142,858
	Bank guarantee	Control through the Government of the Republic of Indonesia	2,964,795,832,456
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	185,879,475,513
	Loans provided	Control through the Government of the Republic of Indonesia	1,813,311,642,966
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	152,570,798,954

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
PT Indonesia Asahan Aluminium (Persero)	Securities	Control through the Government of the Republic of Indonesia	24,465,475,280
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	791,975,345
	Loans provided	Control through the Government of the Republic of Indonesia	3,244,823,056,789
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	5,072,763,175
	Bank guarantee	Control through the Government of the Republic of Indonesia	76,075,200
PT Indra Karya (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	6,654,954,387
PT Industri Kereta Api (Persero) and Subsidiaries	Bank guarantee	Control through the Government of the Republic of Indonesia	50,870,260,484
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	573,806,355,277
PT Industri Telekomunikasi Indonesia (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	308,072,518
PT Jasa Marga (Persero) Tbk and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	4,825,057,560
	Bank guarantee	Control through the Government of the Republic of Indonesia	150,374,783,508
	Loans provided	Control through the Government of the Republic of Indonesia	14,511,462,813,927
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	272,956
PT Kereta Api Indonesia (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	41,635,462,230
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	8,681,769,696
	Loans provided	Control through the Government of the Republic of Indonesia	4,687,981,821,471
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	5,205,826,588
PT Krakatau Steel (Persero) and Subsidiaries	Export bills and other receivables	Control through the Government of the Republic of Indonesia	12,198,147,099
	Acceptance receivables	Control through the Government of the Republic of Indonesia	10,860,808,950
	Bank guarantee	Control through the Government of the Republic of Indonesia	5,249,468,381
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	27,116,725,950
	Loans provided	Control through the Government of the Republic of Indonesia	4,699,123,467,623
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	1,208,377,429,417
PT Len Industri (Persero) and Subsidiaries	Acceptance receivables	Control through the Government of the Republic of Indonesia	266,911,335,996
	Bank guarantee	Control through the Government of the Republic of Indonesia	781,895,847,770
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	337,571,241,955
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	211,190,749,404
	Loans provided	Control through the Government of the Republic of Indonesia	3,583,347,905,064

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
PT Pelabuhan Indonesia (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	65,718,283,155
	Bank guarantee	Control through the Government of the Republic of Indonesia	62,791,568,453
	Loans provided	Control through the Government of the Republic of Indonesia	870,707,856,243
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	3,956,960,827
PT Pelayaran Nasional Indonesia (Persero) and Subsidiaries	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	10,801,487,806
PT Pembangunan Perumahan (Persero) Tbk and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	122,127,936
	Acceptance receivables	Control through the Government of the Republic of Indonesia	1,218,513,113,471
	Bank guarantee	Control through the Government of the Republic of Indonesia	514,688,045,623
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	548,384,084,871
	Loans provided	Control through the Government of the Republic of Indonesia	540,958,445,525
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	1,933,554,475
PT Pengembangan Pariwisata Indonesia (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	58,198,855,995
	Loans provided	Control through the Government of the Republic of Indonesia	67,924,581,814
PT Perkebunan Nusantara III (Persero) and Subsidiaries	Acceptance receivables	Control through the Government of the Republic of Indonesia	292,727,490,600
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	11,122,297,625
	Loans provided	Control through the Government of the Republic of Indonesia	7,540,938,939,984
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	2,187,737,755
PT Pertamina (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	69,078,054,895
	Acceptance receivables	Control through the Government of the Republic of Indonesia	8,545,582,147
	Derivative receivables	Control through the Government of the Republic of Indonesia	2,567,652,733
	Issued securities	Control through the Government of the Republic of Indonesia	12,996,002,989
	Derivative liabilities	Control through the Government of the Republic of Indonesia	26,893,175,416
	Bank guarantee	Control through the Government of the Republic of Indonesia	4,728,735,075,224
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	1,017,057,252,609
	Loans provided	Control through the Government of the Republic of Indonesia	4,288,890,195,329
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	19,261,164,263
PT Perusahaan Listrik Negara ("PLN") (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	719,619,280,747
	Derivative receivables	Control through the Government of the Republic of Indonesia	228,720,194,900
	Derivative liabilities	Control through the Government of the Republic of Indonesia	69,963,823,603
	Bank guarantee	Control through the Government of the Republic of Indonesia	363,998,928,063

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	135,576,230,886
	Loans provided	Control through the Government of the Republic of Indonesia	8,538,267,520,696
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	1,014,647,434,792
PT Pos Indonesia (Persero) and Subsidiaries	Bank guarantee	Control through the Government of the Republic of Indonesia	1,700,582,143
	Loans provided	Control through the Government of the Republic of Indonesia	369,776,603,848
PT Primissima (Persero)	Loans provided	Control through the Government of the Republic of Indonesia	3,560,316
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	392,617,442
PT Pupuk Indonesia Holding Company (Persero) and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	49,455,500,000
	Acceptance receivables	Control through the Government of the Republic of Indonesia	211,198,870,275
	Derivative receivables	Control through the Government of the Republic of Indonesia	20,470,826,194
	Bank guarantee	Control through the Government of the Republic of Indonesia	3,114,170,473,267
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	413,434,811,203
	Loans provided	Control through the Government of the Republic of Indonesia	4,055,706,475,560
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	2,713,791,668,349
PT Rajawali Nusantara Indonesia (Persero) and Subsidiaries	Acceptance receivables	Control through the Government of the Republic of Indonesia	34,069,896,000
	Acceptances Payables	Control through the Government of the Republic of Indonesia	41,394,179,407
	Bank guarantee	Control through the Government of the Republic of Indonesia	36,551,391,071
	Loans provided	Control through the Government of the Republic of Indonesia	925,702,116,441
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	115,156,377,054
PT Reasuransi Indonesia Utama (Persero) and Subsidiaries	Issued securities	Control through the Government of the Republic of Indonesia	19,998,016,042
PT Semen Indonesia (Persero) Tbk and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	117,269,293,980
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	1,638,492,267,855
	Acceptance receivables	Control through the Government of the Republic of Indonesia	31,933,062,744
	Acceptances Payables	Control through the Government of the Republic of Indonesia	7,005,734,836
	Bank guarantee	Control through the Government of the Republic of Indonesia	72,760,244,417
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	82,114,257,174
	Loans provided	Control through the Government of the Republic of Indonesia	3,019,879,556,918
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	10,226,197,613
PT Telkom Indonesia (Persero) Tbk and Subsidiaries	Securities	Control through the Government of the Republic of Indonesia	221,354,083,701
	Export bills and other receivables	Control through the Government of the Republic of Indonesia	254,116,638,456

Affiliate/Related Party/ Transacting Party	Type of Affiliate/ Related Transaction	Nature of Affiliate/ Related Relationship	Transaction Value (IDR)
	Investments in associate entities and equity participation	Control through the Government of the Republic of Indonesia	369,614,560,000
	Bank guarantee	Control through the Government of the Republic of Indonesia	1,596,543,919,713
	Loans provided	Control through the Government of the Republic of Indonesia	7,577,536,214,515
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	3,687,388,755,183
PT Virama Karya (Persero)	Bank guarantee	Control through the Government of the Republic of Indonesia	35,648,676,410
	Loans provided	Control through the Government of the Republic of Indonesia	54,444,321,155
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	15,555,678,845
PT Waskita Karya (Persero) Tbk and Subsidiaries	Acceptances Payables	Control through the Government of the Republic of Indonesia	18,084,383,770
	Bank guarantee	Control through the Government of the Republic of Indonesia	301,927,001,862
	Loans provided	Control through the Government of the Republic of Indonesia	11,476,159,039,155
	Unutilized loan facility	Control through the Government of the Republic of Indonesia	820,897,045
PT Wijaya Karya (Persero) Tbk and Subsidiaries	Export bills and other receivables	Control through the Government of the Republic of Indonesia	106,144,434,550
	Acceptance receivables	Control through the Government of the Republic of Indonesia	17,883,554,478
	Acceptances Payables	Control through the Government of the Republic of Indonesia	3,189,000
	Bank guarantee	Control through the Government of the Republic of Indonesia	1,761,163,470,708
	Irrevocable Letters of Credit	Control through the Government of the Republic of Indonesia	22,596,814,802
	Loans provided	Control through the Government of the Republic of Indonesia	1,995,018,367,071
Key Management	Loans provided	Pengendalian Kegiatan Bank	236,666,767,453
	Unutilized loan facility	Pengendalian Kegiatan Bank	61,177,068,710
	Customer Deposits	Pengendalian Kegiatan Bank	140,859,001,012
Dana Pensiun ("DP") BNI	Issued securities	Berdasarkan Kepemilikan dan/ atau Kepengurusan	14,995,388,064
Dana Pensiun Lembaga Keuangan ("DPLK") BNI	Issued securities	Berdasarkan Kepemilikan dan/ atau Kepengurusan	59,981,552,257
PT Asuransi Tripakarta	Bank guarantees	Berdasarkan Kepemilikan dan/ atau Kepengurusan	48,286,694,443
	Loans provided	Berdasarkan Kepemilikan dan/ atau Kepengurusan	44,442,790
	Unutilized loan facility	Berdasarkan Kepemilikan dan/ atau Kepengurusan	961,205,177
Entity controlled through the Government of the Republic of Indonesia	Deposits from other banks	Pengendalian melalui Pemerintah Republik Indonesia	4,164,696,998,874
Entity controlled through the Government of the Republic of Indonesia	Customer Deposits	Control through the Government of the Republic of Indonesia	112,692,952,012,042
Total			484,771,618,480,790

Realization of Balances and Transactions with Affiliated/Related Parties

Information regarding the balances and transactions of each affiliated/related party recorded by BNI can be found in Note 45 of the Financial Statements, "Transactions with Related Parties," which is an integral part of this annual report. The realization of balances and transactions with affiliated/related parties is presented as follows:

Realization of Balances and Related Party Transactions in the Period of Financial Year 2023 and 2024

Related Party Balances in Assets	2024 (IDR-billion)	2023 (IDR-billion)	Percentage of Total Assets		Increase (Decrease) 2023-2024		
			2024 (%)	2023 (%)	Nominal (IDR-billion)	Percentage (%)	
Current Accounts with Other Banks	43	52	0.0	0.0	(9)	(17.3)	↓
Placements With Other Banks	1,620	1,211	0.1	0.1	409	33.8	↑
Marketable Securities	10,157	11,428	0.9	1.1	(1,271)	(11.1)	↓
Government Bonds	126,661	125,021	11.2	11.5	1,640	1.3	↑
Bills and Other Receivables	6,209	10,085	0.5	0.9	(3,876)	(38.4)	↓
Acceptances Receivables	2,825	3,159	0.3	0.3	(334)	(10.6)	↓
Derivative Receivables	342	38	0.0	0.0	304	800.0	↑
Loans	159,403	126,359	14.1	11.6	33,044	26.2	↑
Investment in Associates and Equity Investments	13,118	11,661	1.2	1.1	1,457	12.5	↑
Total Assets with Related Parties	320,378	289,014	28.4	26.6	31,364	10.9	↑
Total Consolidated Assets	**1,129,806**	**1,086,664**	**100.0**	**100.0**	**43,142**	**4.0**	↑

Asset balances from related parties increased by IDR31.4 trillion or 10.9% compared to the previous year. This increase was dominated by an increase in the balance of related party loans granted amounting to IDR33.0 trillion or 26.2% from the previous year.

Related Party Balances in Liabilities	2024 (IDR-billion)	2023 (IDR-billion)	Percentage of Total Assets		Increase (Decrease) 2023-2024		
			2024 (%)	2023 (%)	Nominal (IDR-billion)	Percentage (%)	
Customer Deposits	112,834	152,080	11.7	16.3	(39,246)	(25.8)	↓
Deposits from other banks	4,165	2,705	0.4	0.3	1,460	54.0	↑
Securities Issued	1,892	1,765	0.2	0.2	127	7.2	↑
Borrowings	1,574	824	0.2	0.1	750	91.0	↑
Subordinated Securities	3	3	0.0	0.0	0	0.0	
Derivative Liabilities	155	136	0.0	0.0	19	14.0	↑
Acceptances Payables	901	1,071	0.1	0.1	(170)	(15.9)	↓
Total Liabilities with Related Parties	121,523	158,584	12.6	17.0	(37,061)	(23.4)	↓
Total Consolidated Liabilities	**962,619**	**931,931**	**100.0**	**100.0**	**30,688**	**3.3**	↑

Liability balances from related parties decreased by IDR37.1 trillion or 23.4% compared to the previous year. This decrease was dominated by a decrease in the balance of related party customer deposits amounting to IDR39.2 trillion or 25.8%.

Prohibitions, Restrictions and/or Significant Barriers to Transferring Funds Between Banks and Other Entities in One Business Group

BNI provides funds to related parties (individuals and groups, including Executive Officers, Board of Directors, and Commissioners of the Bank) based on internal policies fairly with reasonable conditions after approval from the Board of Commissioners. Transactions on the provision of funds to related parties are explained in the chapter on Material Conflict of Interest Transactions and Transactions with Affiliated Parties/ Related Parties.

Total of Fund Provisions to Related Parties up to December 2024	
Subject	**Amount (IDR-billion)**
Total of Provision of Funds	2,192
Capital	152,307
LLL (10% of Capital)	15,231
Over (Under) LLL	13,039 (Under BMPK)

Types of Fund Provisions to Related Parties up to December 2024		
Related Parties	**Type of Provision of Funds**	**Provision of Funds (IDR-Billion)**
PT Bank Syariah Indonesia (Tbk)	Securities	14
BNI Finance	Loans, Bank Guarantees	1,657
BNI Life Insurance	Bank Guarantees	4
BNI Sekuritas	Loans	200
Hibank	Bank Guarantees	151
Individual	Loans	167
Total Provision of Funds to Related Parties		2,192
Capital		152,307
LLL (10% of Capital)		15,231
Over (Under) LLL		13,039 (Under BMPK)

Changes in Legislation that Have a Significant Impact on BNI

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
Law Number 1 of 2024 on the Second Amendment to Law Number 11 of 2008 on Electronic Information and Transactions	- The selected Electronic Certification Provider (PSrE) must have received recognition from the Minister by being affiliated with the parent PSrE organized by the Minister. - Mutual Recognition is carried out by Foreign PSrEs that have been registered in Indonesia. - For electronic transactions that have high risks, BNI must use Electronic Signatures secured by Electronic Certificates. - The preparation of international contracts with standard clauses made by the Electronic System Provider must be regulated by Indonesian law if the service user originates and is in the jurisdiction of Indonesia, the implementation of the contract is within the jurisdiction of Indonesia and the Electronic System Provider carries out business activities in the territory of Indonesia. - It is prohibited to intentionally: 1. Attack the honor/good name of others by using Electronic Information and/or Electronic Documents. 2. Use Electronic Information and/or Electronic Documents with threats of violence, defamation and revealing secrets with the aim of benefiting oneself or others. 3. Disseminate Information and/or Electronic Documents containing false/misleading information that can cause material losses for consumers and unrest in society. 4. Sending Information and/or Electronic Documents containing threats of violence to users of its services. - The Electronic System Organizer may terminate access if there are findings and orders from the Government regarding the existence of Information and/or Electronic Documents containing prohibited content in the BNI Electronic System. - The Electronic System Organizer is required to carry out orders from the Government in order to create a digital ecosystem and there is a risk of being subject to administrative sanctions if BNI does not carry out these orders.	- Changing provisions that are considered open to multiple interpretations - To provide legal certainty and protect the public interest in the use of information technology and electronic transactions	- BNI is required to include child protection in products, services and features organized by BNI through the Electronic System. - BNI is required to use electronic signatures with electronic certificates for electronic transactions that have high risks. - BNI is required to carry out orders from the Government in order to create a digital ecosystem and there is a risk of being subject to administrative sanctions if BNI does not carry out these orders. - BNI is required to prepare standard clauses in international electronic contracts in carrying out electronic transactions which are stated in international electronic contracts in accordance with the provisions of Law No. 1 of 2024.	This does not impact the Financial Statements.
Government Regulation Number 47 of 2024 concerning the Write-off of Bad Debts in Micro, Small, and Medium Enterprises (MSMEs)	- Regulates the write-off of bad debts for MSMEs in various economic sectors which provide a legal basis for BNI to write off MSME bad debt bills by means of write-off and write-off of bad debt collections. - Write-off of bad debts by BNI is carried out on: 1. Bad debts that have been restructured in accordance with the provisions applicable to BNI; and 2. BNI has made optimal collection efforts including restructuring efforts, but are still uncollectible.	To provide easy access to financing for micro, small and medium enterprises through write-offs and write-offs.	- BNI is required to ensure that debtors who wilål be written off or write-off bad debts are in accordance with the criteria for credit or financing that can be written off and written off in accordance with the provisions of PP No. 47 of 2024.	This does not impact the Financial Statements., as the loans have been written off prior to the write-off.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
	Write-off of bad debts does not eliminate BNI's right to collect against the bad debts. - BNI writes off bad debts that have been written off in the form of: 1. MSME credit or financing which is a government program whose funding source is from BNI and the program has been completed when this PP comes into effect 2. MSME credit or financing outside the government program whose distribution uses funds from BNI 3. MSME credit or financing due to natural disasters such as earthquakes, liquefaction or other natural disasters determined by the central government, regions and/or authorized agencies - Credit or financing that can be written off must meet the following criteria: 1. The principal value of bad debts is a maximum of IDR 500 million per debtor per customer; 2. Has been written off for at least 5 (five) years when this PP comes into effect; 3. Not credit or financing guaranteed by insurance or credit or financing guarantees and 4. There is no credit or financing collateral or there is credit or financing collateral but in a condition that does not allow it to be sold or the collateral has been sold out but cannot pay off the customer's loan/ obligations. - BNI submitted a report on the realization of the implementation of the write-off of bad debts to the Minister who handles government affairs in the BUMN sector.		- BNI needs to prepare internal provisions regarding the write-off and write-off of bad debts in accordance with the provisions of PP No. 47 of 2024.	
Regulation of the Minister of Finance Number 44 of 2024 concerning the Strategy and Implementation of Management of Surplus and Shortfalls of Central Government Cash	- Financial Services Institutions (LJK) can become Working Partners in managing excess and shortages of Government Cash by submitting an application to become a Working Partner to the Director General of Treasury as the Authorized State Treasurer (BUN) of the Center. - One of the instruments for managing excess and shortages of central government cash is by placing state money in Commercial Banks and withdrawing state money from Placement Accounts at Commercial Banks. - The Authorized BUN of the Center can place state money in Commercial Banks after coordinating with the Governor of BI. Placement of State Money is carried out in the form of overnight, deposit on call and time deposit and Commercial Banks provide interest or yields on the placement of state money. - Withdrawals on the placement of state money in Commercial Banks are carried out at maturity or before maturity by referring to the Agreement for the implementation of the placement of state money in Commercial Banks.	In order to implement more effective, optimal and adaptive management of excess and shortage of central government cash to the development of cash management practices.	BNI is required to provide interest or returns on the placement of state money as one of the instruments for managing excess central government cash.	This does not impact the Financial Statements.
Regulation of the Minister of Finance Number 47 of 2024 concerning the Third Amendment to Regulation of the Minister of Finance Number 70/-MK/03/2017 concerning Technical Instructions Concerning Access to Financial Information for Tax Purposes	- Prohibition of Financial Services Institutions (LJK) from serving the opening of new financial accounts or new transactions related to old financial accounts owned by individuals and/or entities that refuse to comply with the provisions of the financial account identification procedures and documentation. - Prohibition for LJK from entering into agreements and/or practices with the intent and purpose of avoiding obligations as stipulatedå in laws and regulations governing access to financial information for tax purposes.	Providing legal certainty for LJK in submitting reports containing financial information for tax purposes and to regulate anti-avoidance provisions in accordance with common reporting standards.	- Prohibition for BNI to: a. Open new financial accounts or new transactions related to old financial accounts for individuals and/or entities that refuse to follow the financial account identification and documentation procedures;	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
	- Prohibition for LJK from making false statements or hiding or reducing actual information from information that must be submitted. - Changes regarding the provisions for imposing sanctions in the event of indications of violations of the fulfillment of provisions regarding access to financial information for tax purposes.		b. Make agreements and/or practices with the intent and purpose of avoiding obligations as stipulated in laws and regulations governing access to financial information for tax purposes; c. Make false statements or hide or reduce actual information from the information that must be submitted.	
Regulation of the Minister of Finance Number 81 of 2024 concerning Tax Provisions in the Framework of Implementing the Core Tax Administration System (SIAP)	- The implementation of tax rights and fulfillment of tax obligations by Taxpayers is carried out electronically, namely through the taxpayer portal, other pages/applications integrated with the Directorate General of Taxes administration system and/or contact center. - Deposits and reporting of tax obligations for Corporate Taxpayers who have Branch Offices are carried out centrally. - Changes in the due date for tax deposits and reporting to be simultaneous on the 15th (fifteenth) of the following month for all types of taxes. - Changes in the format of tax deduction evidence documents, the format of the Annual Corporate Income Tax Return report, and so on.	- Arrangement of laws and regulations in the scope of business processes, information technology and databases to implement a more transparent, effective, efficient, accountable and flexible tax administration system update. - Strengthening previous regulations. - Adjustment of state financial policies to the economic situation.	BNI needs to adjust the reporting system and tax payment mechanism in accordance with the Core Tax Administration System (SIAP).	This does not impact the Financial Statements.
Regulation of the Minister of Finance Number 74 of 2024 concerning the Establishment of Reserves for Doubtful Accounts that May be Deducted from Gross Income	- Bank business taxpayers can charge for the write-off of bad debts through the formation of reserves, namely the charge for the write-off of bad debts through provisions formed since the initial recognition of receivables. - The calculation of reserves is calculated in accordance with Financial Accounting Standards (SAK) with certain limitations (applied to the calculation of the carrying value of the reserve for bad debts at the end of the tax year determined by the OJK for each group of receivables quality including receivables quality groups based on good, less good and bad stages (staging) or other receivables quality groups (based on collectability).	- Provide convenience in calculating the cost of forming reserves for doubtful accounts for banking businesses and other business entities that distribute credit, leases with option rights, consumer finance companies and factoring companies for tax purposes. - Alignment of tax provisions on the calculation of the cost of forming reserves for doubtful accounts for banks for tax purposes.	– BNI needs to adjust the calculation of BNI reserves calculated according to SAK for each credit quality based on staging. – BNI needs to adjust the policy regarding the calculation of BNI reserves calculated according to SAK for each credit quality based on staging.	Has been applied to the calculation of tax expense and deferred tax assets
Financial Services Authority Regulation Number 4 of 2024 concerning Reports of Ownership or Any Changes in Ownership of Public Company Shares and Reports of Activities of Pledge of Public Company Shares	– The obligation to report ownership or any changes in share ownership of a public company applies to: 1. Members of the board of directors or members of the board of commissioners who own shares with voting rights either directly or indirectly. 2. Any party who owns shares with voting rights of at least 5% (five percent), including when there is a decrease in the percentage of share ownership with voting rights to less than 5% (five percent). 3. Parties who are controllers of the Public Company.	In order to improve the quality of information disclosure by certain shareholders and supervision carried out on share ownership reports, adjustments to international standards/ comparative study results in other countries and expanding the scope of regulations to include other types of transactions carried out by shareholders of Public Companies such as share pledge activities.	BNI needs to make adjustments regarding reporting obligations on ownership reports or any changes in share ownership of public companies and reports on share pledge activities of public companies.	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
	– The period for fulfilling the reporting obligation is as follows: 1. Reporting of ownership or any changes in share ownership of a Public Company must be done immediately no later than 5 (five) working days since the occurrence of ownership of voting rights over shares or any changes in ownership of voting rights over shares of the Public Company. 2. Reporting of activities to pledge shares of a Public Company immediately no later than 5 (five) working days since the signing of the Agreement on activities to pledge shares of a Public Company which results in the fulfillment of the number of shares pledged by 5% (five percent) of voting rights. 3. In the event that the OJK has provided an electronic reporting system, submission of reports as referred to in letters a and b must be done immediately, no later than 3 (three) working days.			
Financial Services Authority Regulation Number 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions	- Financial Services Institutions (LJK) are required to prepare and submit anti-fraud strategy policies and fraud incident reports, both routine and incidental reports, and late submission fines that are adjusted to the complexity of business activities. - LJK are required to determine a work program to achieve the target of implementing an anti-fraud strategy. - LJK are required to submit a report on the implementation of an anti-fraud strategy every semester. - LJK are required to submit a report on changes to the anti-fraud strategy no later than 7 (seven) working days since the changes are made. - LJK are required to implement a Fraud Detection System accompanied by increased understanding of related internal and external parties, and supported by the implementation of adequate risk management.	Integration of OJK provisions related to the implementation of anti-fraud strategies that have been in effect in several financial services sectors and the expansion of coverage to apply to all LJK	- BNI is required to submit a report on the implementation of the Anti-Fraud Strategy to OJK. - BNI is required to submit a report on Fraud incidents with significant impacts to OJK within a maximum period of 3 (three) working days after it is known that Fraud has occurred with significant impacts	This does not impact the Financial Statements.
POJK No. 4 of 2024 concerning Ownership Reports or Any Changes in Ownership of Public Company Shares and Reports on Activities Securing Public Company Shares	• Members of the Board of Directors or members of the Board of Commissioners who hold shares with voting rights, either directly or indirectly, are required to submit a report on their ownership of voting rights over shares and any changes in ownership of voting rights over shares of the public company to OJK. • The report must be submitted immediately, no later than 5 (five) working days from the occurrence of the ownership of voting rights over shares or any changes in ownership of voting rights over shares of the public company. • The report on ownership of voting rights over shares or any changes in ownership of voting rights over shares of the public company must contain at least: 1. name, residence, and nationality; 2. name of the public company's shares; 3. number of shares and percentage of ownership of shares with voting rights over the public company's shares before and after the transaction; 4. type of transaction conducted; 5. number of shares purchased, sold, or transferred;	In order to improve the quality of information disclosure by certain shareholders and the oversight conducted on share ownership reports, adjustments are made in accordance with international standards/ comparative studies in other countries and to expand the scope of regulations.	BNI is required to report to OJK on the Ownership Report or Any Changes in Ownership of Public Company Shares from members of the Board of Directors or members of the Board of Commissioners who hold shares with voting rights, either directly or indirectly.	This does not impact the Financial Statements.
POJK No. 5 of 2024 concerning the Determination of Supervisory Status and Handling of Issues in Commercial Banks	• Adjustment of bank supervisory status and supervisory actions. • Applicable to banks other than systemic banks. • Adjustment of the establishment and capital mechanism for intermediary banks.	Alignment and updating of provisions in connection with the issuance of the Law on Development and Strengthening of the Financial Sector (Law No. P2SK).	BNI has updated the Company Guidelines to align with the provisions as stipulated in the POJK.	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
PADG No. 3 of 2024 concerning the Fourth Amendment to PADG No. 22/23/PADG/2020 on the Implementation of Open Market Operations	• Addition of Open Market Operation (OMO) instruments in the form of repo transactions and domestic non-deliverable forward (DNDF) transactions with a non-auction mechanism. • Bank Indonesia may accept all or part of the repo transaction proposals for conventional OMOs submitted by conventional OMO participants using a non-auction mechanism. • Bank Indonesia may reject DNDF transaction proposals on a non-auction basis based on certain considerations.	Strengthening monetary operation strategies integrated with the development of the money market and foreign exchange market.	BNI has updated the Company Guidelines to align with the provisions as stipulated in the PADG.	This does not impact the Financial Statements.
PBI No. 2 of 2024 concerning Information System Security and Cyber Resilience for Payment System Providers, Money Market and Foreign Exchange Market Participants, and Other Parties Regulated and Supervised by Bank Indonesia	• Providers conduct periodic evaluations of the Information System Security and Cyber Resilience (KKS) strategic plan in accordance with the developments in cyber risk. • KKS policies, standards, and procedures encompass human, process, and technology aspects, which at a minimum include: - Data, application system, and information technology infrastructure security; - Third-party security; and - Consumer protection and fraud prevention. • Providers establish a Cyber Incident Response Team at the organizational level that plays a role in handling cyber incidents.	As a mitigation for Cyber Risk, it is necessary to establish regulations and oversight for information system security and cyber resilience for Payment System Providers, Money Market participants, and Foreign Exchange Market participants, as well as other parties regulated and supervised by Bank Indonesia.	BNI is required to develop strategies and policies for Information System Security and Cyber Resilience, conduct periodic evaluations of these policies, and activate a Cyber Incident Response Team at the organizational level.	This does not impact the Financial Statements.
PBI No. 5 of 2024 concerning Competency Standardization in the Payment System Field (PBI SK SP) and PADG No. 17 of 2024 concerning Implementation of Competency Standardization in the Payment System Field	1. PBI SK SP adjusts several terminologies, particularly aligning the terminology of the Payment System and Rupiah Currency Processing (SPPUR) to SP (Payment System), which also includes Rupiah currency processing activities. 2. SK SP encompasses Payment System Activities, which include: - Operational activities of the payment system; - Operational activities of Rupiah currency processing services; - Foreign exchange trading activities and the carrying of foreign banknotes. 3. SK SP is implemented through the application of: - National Work Competency Standards of Indonesia (SKKNI) in the Payment System; and - National Qualification Framework of Indonesia (KKNI) in the Payment System. 4. The Qualification Levels in the Payment System consist of: - Payment System Qualification Level 4 for Implementers; - Payment System Qualification Level 5 for Supervisors; and - Payment System Qualification Level 6 for Executive Officials and Board Members. 5. The implementation of SK SP is carried out through: - Competency-Based Training (PBK) in the Payment System organized by Payment System Training Institutions (LPK); and - Competency Certification in the Payment System organized by Professional Certification Institutions (LSP) in the Payment System.	As a fulfillment of the Law on Development and Strengthening of the Financial Sector (UU P2SK), which among other things regulates the enhancement of the quality of human resources in the financial sector, including the payment system sector, Bank Indonesia re-regulates the implementation of Competency Standardization in the Payment System.	BNI is required to obtain a Competency-Based Training Certificate in the Payment System and/or a Payment System Competency Certificate no later than 6 months from the effective date of assuming the position.	This does not impact the Financial Statements.
PBI No. 6 of 2024 concerning the Money Market and Foreign Exchange Market	• Regulations related to the roles of participants, types, transaction scopes, and forms of licensing in the Money Market and Foreign Exchange Market (PUVA) • Bank Indonesia's authority to establish the use of identity standards for participants in PUVA transactions, regulate mechanisms, and set the timing for PUVA transactions (as well as the obligation of participants to comply). • Forms of Licensing in the Money Market and Foreign Exchange Market.	Bank Indonesia conducts comprehensive (end-to-end) regulation, development, and supervision of Products, Pricing, PUVA participants, and the provision of Financial Market Infrastructure to create a more organized and well-functioning Money Market and Foreign Exchange Market.	BNI has made adjustments to its internal Company Guidelines related to this.	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
PADG No. 6 of 2024 concerning Amendments to PADG No. 4 of 2023 on Export Proceeds and Import Payment Foreign Exchange	1. Bank obligations related to the inflow and placement of Export Proceeds in Foreign Exchange from Natural Resources (DHE SDA) to ensure, among other things: - The inflow and placement of funds originating from DHE SDA by the Bank are conducted through instruments available domestically. - Exporters with Export Values of less than USD 250,000.00 who deposit DHE SDA into the DHE SDA Mutual Fund have submitted a voluntary declaration letter. 2. Regarding the utilization of DHE SDA: - The transfer from conventional foreign currency term deposit transactions in the open market at Bank Indonesia to Bank swaps with Bank Indonesia must be accompanied by a declaration letter from the Exporter. - Bank Indonesia may request the Bank to provide information on the utilization of placement instruments in the form of rupiah credit collateral and FX swap transactions of Exporters with the Bank.	In order to strengthen the oversight mechanism over the inflow, placement, and utilization of Export Proceeds in Foreign Exchange from Natural Resources (DHE SDA) into the Indonesian financial system to support the optimization of DHE utilization, additional regulations have been established for Banks and the Indonesia Export Financing Agency (LPEI) in managing DHE SDA to clarify the obligations set forth in Bank Indonesia Regulations regarding Export Proceeds and Import Payment Foreign Exchange.	BNI has made adjustments to its internal Company Guidelines related to this.	This does not impact the Financial Statements.
POJK No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Service Institutions	• Types of acts classified as fraud include: corruption, asset misuse, financial statement fraud, deception, leakage of confidential information, and/or other actions that can be equated with fraud in accordance with the provisions of laws and regulations. • Financial Service Institutions (LJK) ensure that the organizations they control (including subsidiaries and/or foundations) have an Anti-Fraud Policy (SAF) and implement it. • Changes in the scope of parties involved in implementing SAF include non-bank LJK. • Criteria for fraud incidents that must be reported in the Significant Fraud Incident Report include: a. Significant violations of laws and regulations committed by the fraud perpetrator; b. Fraud incidents that could jeopardize the continuity of the LJK's business; and/or fraud incidents that have the potential to attract public attention or diminish the reputation of the LJK.	The increasing complexity of business activities in the financial services sector has made Financial Service Institutions (LJK) more exposed to the risk of fraud, which can result in losses to the financial services industry, the government, and/or the public.	• BNI is required to develop and submit an anti-fraud strategy policy and fraud incident reports (routine/ incident reports), implement a Fraud Detection System, and have a work unit or function for the implementation of the anti-fraud strategy. • BNI must ensure that its subsidiaries have an Anti-Fraud Policy (SAF) and implement it. • BNI is required to submit the first SAF Implementation Report no later than January 31, 2025.	This does not impact the Financial Statements.
PBI No. 7 of 2024 concerning the Foreign Funding Ratio of Banks and PADG No. 7 of 2024 concerning the Implementation Regulations of the Foreign Funding Ratio of Banks	1. The Foreign Funding Ratio of Banks (RPLN) is the ratio of Short-Term Liabilities to Bank Capital calculated on a daily basis. Bank Indonesia sets the maximum RPLN limit at 30% with an addition or reduction of the percentage of the countercyclical parameter. 2. Short-Term Liabilities included in the RPLN consist of Short-Term Bank Foreign Loans, Short-Term Domestic Foreign Currency Bonds, and/or Short-Term Time Deposits. 3. Components not included in the calculation of Short-Term Liabilities are as follows: a. Short-Term Foreign Loans b. Deposits owned by non-residents c. Deposits or time deposits owned by non-residents intended for temporary storage of capital contribution funds as referred to in OJK Regulations. d. Deposits, savings, and time deposits: • Owned by foreign state representatives and international institutions, including staff members of foreign state representatives and international institutions; • Owned by non-residents placed in the foreign branches of banks headquartered in Indonesia and used for the distribution of credit or financing to non-residents;	The necessity of macroprudential policy instruments to manage banks' short-term foreign funding sources by considering financial and economic cycles, as well as a risk-based approach and strengthening the principles of prudence in the management of banks' foreign funding.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
	e. Liabilities of the bank to non-residents arising: • from hedging transactions; • due to repurchase agreement (repo) transactions of foreign exchange instruments issued by the Government or BI; f. Business funds of a branch office of a Bank domiciled overseas up to 100% of the declared business funds; and/or g. Other forms of funding determined by Bank Indonesia.			
POJK No. 13 of 2024 concerning Transparency and Publication of the Basic Interest Rate for Conventional Commercial Banks	• The definition of the Basic Interest Rate for Credit (SBDK) has been changed to indicate the lowest effective interest rate, to avoid confusion with interest rates that are specific or related to certain policies. • The SBDK set by the Bank considers benchmark interest rates such as the BI 7-day repo rate and the LPS guarantee interest rate. • The announcement of the SBDK to the public is made through the website, each Conventional Commercial Bank office, and digital channels. • Banks are required to maintain 5 years of historical SBDK information.	Referring to the P2SK Law, where commercial banks are required to ensure transparency in interest rates to encourage efficiency in the determination of banking interest rates to support economic financing in the form of transparency in the components of the calculation of the bank's basic interest rate, namely the Cost of Funds (HPDK), overhead, and margin.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.
PADG No. 10 of 2024 concerning the Settlement of Bilateral Transactions between Indonesia and South Korea using Rupiah and Won	1. Financial activities in the Bilateral Transactions of Rupiah and Won include: a. Opening or Designation of Special Purpose Non-Resident Accounts (SNA) in Rupiah and Won; b. Management of SNA in Won; c. Opening or Designation of Sub-SNA in Won; d. Management of Sub-SNA Balances in Won and Rupiah, including: • Management of Sub-SNA Balances in Won; • Addition to Sub-SNA Balances in Won; • Reduction of Sub-SNA Balances in Won; and • Management of Sub-SNA Balances in Rupiah; e. Transfer of Rupiah and Won; and f. Financing. 2. Transactions of Won against Rupiah include: a. Spot transactions; b. Forward transactions; c. Swap transactions; d. Cross currency swap transactions; e. Domestic non-deliverable forward transactions; and/or f. Other transactions as determined by agreement between Bank Indonesia and the Bank of Korea. 3. The implementation of transactions under the Bilateral Transactions scheme of Rupiah and Won is exempt from the prohibition on conducting domestic non-deliverable forward transactions in South Korea in Won against Rupiah.	To encourage the use of Rupiah and Won for the settlement of bilateral transactions between Indonesia and South Korea.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.
PADG No. 11 of 2024 concerning Foreign Exchange Market Transactions	1. The scope of regulation, development, and supervision of Foreign Exchange Market transactions includes: • Designation of types of Foreign Exchange Market transactions; • Underlying transactions in the Foreign Exchange Market; and • Prohibitions and limitations on Foreign Exchange Market transactions. 2. Regulations regarding foreign exchange market products include contracts and written confirmations, including the use of smart contracts, benchmark rates that can be used in foreign exchange market transactions, and foreign exchange market transactions.	Regulation, development, and supervision in the Foreign Exchange Market are carried out with a transformative perspective that aligns with the direction of Bank Indonesia's transformation and takes into account international best practices to support optimal and efficient domestic foreign exchange liquidity, thereby accelerating the realization of a modern and advanced Foreign Exchange Market.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
PADG No. 13 of 2024 concerning Money Market Transactions	• Regulating the forms and types of Money Market instruments, the use of benchmark rates in the Money Market, and the issuance of Money Market instruments. • Regulations regarding the implementation of Money Market Transactions, which include types of transactions, criteria, qualifications of participants, transaction mechanisms, transaction timing, transaction settlement, and standardization of money market transactions.	As a basis for the regulation and supervision of the mechanisms of Money Market Transactions and the mechanism for establishing Benchmark Prices in the Money Market.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.
POJK No. 15 of 2024 concerning the Integrity of Bank Financial Reporting	• Banks are required to have an integrity-based financial reporting process to ensure the truthfulness, accuracy, and transparency of the Financial Information and Financial Reports produced. • The Board of Directors, Board of Commissioners, and Executive Officers are prohibited from taking actions that intentionally cause: - Financial Information and/or Financial Reports of the Bank not to reflect the actual condition of the Bank; - Manipulation of Financial Information and/or Financial Reports of the Bank; - Financial Reports of the Bank not to comply with Financial Accounting Standards and OJK regulations regarding the recording of financial transactions; and/or - Financial Information and/or Financial Reports of the Bank not to comply with the provisions of laws and regulations in the financial services sector. • Banks are required to establish and implement internal control policies and procedures in the financial reporting process (establishment to be carried out by the President Director after obtaining approval from the Board of Commissioners). • Banks are required to form a special working unit that may be combined with the working unit handling risk management functions, compliance functions, or anti-fraud functions. • The Board of Directors must submit an internal control report in the financial reporting process of the Bank to OJK. The internal control report in the financial reporting process of the Bank must at least contain: - A statement from the Board of Directors regarding their responsibility for the implementation of internal controls in the financial reporting process of the Bank; and - The results of the Board of Directors' assessment of the effectiveness of internal controls in the financial reporting process of the Bank. • Affiliated Parties are prohibited from intervening with the Board of Directors, Board of Commissioners, Controlling Shareholders, and/or Executive Officers in the financial reporting process of the Bank. Intervention actions are actions that: - Harm or potentially harm the Bank; and/or - Cause the Bank to be non-compliant with the provisions of laws and regulations in the financial reporting process.	• Emphasis on the importance of integrity behavior from the Board of Directors, Board of Commissioners, Sharia Supervisory Board, and all other individuals involved in the preparation of financial reports in accordance with the Banking Law as last amended by the P2SK Law. • The implementation of internal controls in the financial reporting process or internal control over financial reporting (ICOFR) in several countries to encourage reliable financial reports that comply with accounting standards.	• BNI has established internal control policies and procedures in the financial reporting process of the Bank. • BNI is required to form a special working unit or appoint an Executive Officer responsible for preventing fraud or manipulation in the Financial Information and/or Financial Reports of the Bank.	Impacting the Financial Reports, where BNI must ensure an integrity-based financial reporting process.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
PADG No. 14 of 2024 concerning the Second Amendment to PADG No. 22/20/PADG/2020 concerning the Settlement of Bilateral Transactions between Indonesia and Japan	1. The designation of the Bank as the ACCD Bank of Indonesia by BI is carried out with consideration of: a. Size; b. Interconnectedness; and c. Complexity. 2. The opening of the Rupiah SNA is conducted by: a. Opening a new Rupiah SNA account at the ACCD Bank of Indonesia; or b. Designating an existing account held by the ACCD Bank of Japan at the ACCD Bank of Indonesia. 3. The opening of the Yen SNA is conducted by: a. Opening a new Yen SNA account at the ACCD Bank of Japan; or b. Designating an existing account held by the ACCD Bank of Indonesia at the ACCD Bank of Japan.	In order to encourage the development of bilateral transactions using Rupiah and Yen.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.
PADG No. 15 of 2024 concerning the Amendment to PADG No. 23/16/PADG/2021 concerning the Settlement of Bilateral Transactions between Indonesia and China using Rupiah and Yuan through Banks	1. Settlement of Bilateral Transactions Using Rupiah and Yuan (Local Currency Settlement), hereinafter referred to as LCS Rupiah and Yuan, is the settlement of transactions conducted bilaterally by business actors in Indonesia and China using Rupiah and Yuan, both onshore Yuan and offshore Yuan. 2. The designation of the Bank as the ACCD Bank of Indonesia by BI is carried out with consideration of: a. Size; b. Interconnectedness; and c. Complexity. 3. The opening of the Rupiah SNA is conducted by: a. Opening a new Rupiah SNA account at the ACCD Bank of Indonesia; or b. Designating an existing account held by the ACCD Bank of China at the ACCD Bank of Indonesia. 4. The opening of the Yuan Sub-SNA is conducted by: a. Opening a new Yuan Sub-SNA account at the ACCD Bank of Indonesia; or b. Designating an existing account held by Indonesian Customers at the ACCD Bank of Indonesia to become a Yuan Sub-SNA.	In order to encourage the use of Rupiah and Yuan.	BNI has made adjustments to its internal Company Guidelines related to this	This does not impact the Financial Statements.
SEOJK No. 13/SEOJK.08/2024 concerning the Preparation and Submission of Financial Literacy and Financial Inclusion Plan Reports and Realization Reports	PUJK is required to prepare and submit the following reports: 1. Financial Literacy Reports a. Activity plan report to enhance Financial Literacy; and b. Realization report of activities to enhance Financial Literacy. 2. Financial Inclusion Reports a. Activity plan report to enhance Financial Inclusion; and b. Realization report of activities to enhance Financial Inclusion.	As a guideline for PUJK regarding the preparation and submission of financial literacy and financial inclusion plan reports and realization reports, including the format, preparation, and procedures for submitting financial literacy and inclusion reports.	BNI is required to submit the Financial Literacy and Financial Inclusion Report to OJK.	This does not impact the Financial Statements.
PADG No. 22 of 2024 concerning the Report on the Implementation of Competency Standardization in the Payment System Sector	• The Reporter of the Report on the Implementation of Competency Standardization in the Payment System Sector is the SK SP Actors and the SK SP Organizers, and is required to prepare and submit the report to BI in a complete, accurate, current, comprehensive, and timely manner. • The Reporter must appoint and register the reporting officers and responsible parties into the Bank Indonesia reporting system. • The reports submitted by the Reporter consist of: - Periodic reports, which are submitted quarterly and annually, and - Incidental reports. • Reports must be submitted by the Reporter quarterly, annually, and incidentally in accordance with the deadlines set by BI.	In order to enhance the efficiency of report submission and improve the quality of report data, Bank Indonesia has developed a metadata-based reporting system that can accommodate the online submission of the Report on the Implementation of Competency Standardization in the Payment System Sector.	BNI is required to submit the Report on the Implementation of Competency Standardization in the Payment System Sector to BI.	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
PADG No. 23 of 2024 concerning the Primary Dealers in the Money Market and Foreign Exchange Market	a. Obligations of the Primary Dealers in the Money Market and Foreign Exchange Market (PUVA): to act as market makers, actively engage in OPT transactions, actively conduct transactions in the Money Market and Foreign Exchange Market, and fulfill other obligations to carry out activities in the Money Market and Foreign Exchange Market as stipulated by BI, providing data, information, reports, explanations, and/or clarifications related to the execution of their role as Primary Dealers in PUVA to BI. b. Activities of the Primary Dealers in PUVA: accessing facilities provided for Primary Dealers in PUVA, participating in OPT transactions with other Primary Dealers in PUVA, obtaining information related to their role as Primary Dealers in PUVA, and/or other activities as determined by BI. c. Submission of data, information, reports, explanations, and/or clarifications by Primary Dealers in PUVA to BI: surveys, reporting, and/or other methods as stipulated by Bank Indonesia. d. Reporting by Primary Dealers in PUVA: periodic reports and incidental reports.	Regulation, development, and supervision of the Money Market and Foreign Exchange Market are directed towards building a modern and advanced Money Market and Foreign Exchange Market to support the effectiveness of monetary policy, financial system stability, and synergy in economic financing.	BNI has registered with BI to become a Primary Dealer in the Money Market and Foreign Exchange Market.	This does not impact the Financial Statements.
SEOJK No. 18/ SEOJK.08/2024 concerning Self-Assessment of Compliance with Consumer Protection and Community Provisions in the Financial Services Sector	This SEOJK regulates the self-assessment of compliance with consumer protection and community provisions in the financial services sector, including: a. the format and preparation of the self-assessment report; b. the submission of the self-assessment report; c. the responsible parties for the report; and d. the procedures for submitting the self-assessment report.	As a guideline for the implementation of self-assessment of compliance with consumer protection and community provisions in the financial services sector.	BNI is required to conduct a self-assessment of compliance with consumer protection and community provisions in the financial services sector and submit it to OJK.	This does not impact the Financial Statements.
POJK No. 26 of 2024 concerning the Expansion of Banking Business Activities	1) Adjustment of the scope of subsidiaries (investee) of Commercial Banks to align with the P2SK Law. 2) Commercial Banks conducting conventional business activities are prohibited from making Capital Participation except to Financial Services Institutions (LJK) and/or other companies that support the banking industry. 3) In the event that a subsidiary of a Commercial Bank in the form of a financial services institution engages in capital participation, the Commercial Bank must ensure that the capital participation by the subsidiary is conducted in: a. financial services institutions; b. other companies that support the banking industry; c. non-financial institutions that support Islamic banking financing; d. (specifically for capital participation by subsidiaries of Commercial Banks that operate based on Sharia Principles). 4) The transfer of receivables by Banks includes Commercial Banks, Islamic Commercial Banks, Rural Banks (BPR), and Islamic Rural Banks (BPR Syariah). 5) Guarantees by Commercial Banks must refer to internationally applicable standards/ practices. 6) Implementation of Electronic Signatures (TTE) and electronic agreements in the provision of Bank products, in accordance with the provisions of legislation. 7) Bank activities as organizers of Foreign Exchange Trading Business Activities (KUPVA).	Alignment and updating of provisions in relation to the issuance of the P2SK Law.	BNI is required to ensure that the capital participation conducted (by BNI and its Subsidiaries) is in accordance with the provisions as regulated in the POJK.	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
POJK No. 28 of 2024 concerning the Management of Information on the Track Record of Actors through the Actor Information System in the Financial Services Sector	1) The scope of parties classified as Actors includes individuals, corporations, business entities both in the form of legal entities and those not in the form of legal entities, or other bodies. 2) The scope of parties classified as Users includes Financial Services Institutions (LJK) and parties conducting activities in the financial services sector. 3) Requirements for Users to obtain Access Rights to the Actor Information System (SIPELAKU). 4) Criteria for Users' considerations in accessing and using Track Records in SIPELAKU. 5) Coverage and sources of data and/or information contained in the Track Records in SIPELAKU. 6) Obligations and prohibitions for Users in the use and management of Track Records in SIPELAKU. 7) Administrative sanctions for violations of obligations and prohibitions regulated in this Financial Services Authority Regulation.	To support the strengthening of supervision and law enforcement as well as the enhancement of integrity in the financial services sector, it is necessary to provide data and information on the Track Record of Actors in the financial services sector through the Actor Information System in the Financial Services Sector (SIPELAKU).	BNI is required to have and implement policies and procedures related to the Actor Information System (SIPELAKU).	This does not impact the Financial Statements.
POJK No. 30 of 2024 concerning Financial Conglomerates and Parent Companies of Financial Conglomerates	• Controlling Shareholders (PSP) and/or Ultimate Controlling Shareholders (PSPT) of Financial Conglomerates are required to establish a Parent Company of Financial Conglomerates (PIKK) if the Financial Conglomerate (KK) meets the criteria: a. the total assets of the Financial Services Institutions (LJK) in the Financial Conglomerate are at least IDR 100,000,000,000,000.00 (one hundred trillion rupiah), and consist of at least 2 (two) LJKs in 2 (two) different sectors within the Financial Conglomerate; or b. the total assets of the Financial Services Institutions (LJK) in the Financial Conglomerate are at least IDR 20,000,000,000,000.00 (twenty trillion rupiah) but less than IDR 100,000,000,000,000.00 (one hundred trillion rupiah), and consist of at least 3 (three) LJKs in 3 (three) different sectors within the Financial Conglomerate. • The establishment of PIKK must obtain approval from OJK. • The LJK designated as the Operational PIKK must submit documents no later than 6 months after meeting the conditions as a KK that is required to establish a PIKK. • The Operational PIKK must hold a General Meeting of Shareholders (GMS) that includes an agenda for the approval of amendments to the articles of association (after obtaining OJK approval) which must at least include: a. the authority, responsibilities, and term of office of directors overseeing the management functions or units of the Financial Conglomerate; b. a clause stating that members of the board of directors overseeing the management functions or units of the Financial Conglomerate must obtain approval from the Financial Services Authority before carrying out their actions, duties, and functions; and c. prohibitions for PIKK as at least regulated in the Financial Services Authority Regulation. • PIKK is required to prepare a strategic plan for the Financial Conglomerate in the form of a corporate plan for the Financial Conglomerate (prepared by the board of directors of PIKK and approved by the board of commissioners of PIKK). • PIKK is required to prepare and have a corporate charter for the Financial Conglomerate.	Alignment and updating of provisions related to Financial Conglomerates and Parent Companies of Financial Conglomerates in relation to the issuance of the P2SK Law.	• BNI is required to seek approval from OJK for the establishment of the Parent Company of Financial Conglomerates (PIKK) and subsequently hold a General Meeting of Shareholders (GMS) (after obtaining OJK approval) that includes an agenda for the approval of amendments to the articles of association as regulated in the POJK. • BNI is required to prepare a strategic plan for the Financial Conglomerate and have a corporate charter for the Financial Conglomerate.	This does not impact the Financial Statements.

Legislation	Significant Changes from Previous Regulations or Main Points of New Regulations	Reasons for Changes	Impact and Adjustments Made by BNI and Subsidiaries	Impact on Financial Statements
POJK No. 44 of 2024 concerning Bank Secrecy	• Banks and Affiliated Parties are required to keep confidential information regarding Depositor Customers and their Deposits and/or Investor Customers and their Investments. • In the event that: a. Depositor Customers are also Debtor Customers; b. Depositor Customers are also Customers receiving facilities; c. Investor Customers are also Customers receiving facilities; or d. Investor Customers are also Debtor Customers, the obligation of Banks and Affiliated Parties to maintain the confidentiality of information regarding Customers is carried out in their capacity as Depositor Customers and their Deposits and/or Investor Customers and their Investments. • The obligation to keep confidential information regarding Depositor Customers and their Deposits and/or Investor Customers and their Investments does not apply, among others, to: a. the interests of the judiciary in civil cases between Banks and Customers, Customers and Customers, and related to Customers; b. the interests of the judiciary in criminal cases; c. requests from curators appointed based on court decisions regarding bankruptcy or requests from liquidators appointed based on court rulings in the context of asset settlement; d. requests, approvals, or powers of attorney from Depositor Customers and/or Investor Customers made in writing; e. requests from legitimate heirs of Depositor Customers and/or Investor Customers who have passed away; f. information exchange between Banks; • In conducting the opening of Bank Secrecy, Banks are required to have internal procedures regarding the opening of Bank Secrecy. • OJK is authorized to grant written permission to open Bank Secrecy for: a. the interests of the judiciary in criminal cases; b. fulfilling mutual legal assistance in criminal matters; and c. the settlement of receivables that have been submitted to the State Receivables Committee. • In the context of information exchange between Banks, the board of directors of a Bank or equivalent may disclose Bank Secrecy to another Bank.	Alignment in relation to the issuance of the P2SK Law.	BNI is required to make adjustments to the relevant internal Company Guidelines.	This does not impact the Financial Statements.

Changes in Accounting Policies and Their Impact on BNI

Changes in PSAK and ISAK Numbering in Indonesian SAK		
Explanation of Changes in Accounting Policies Enacted	:	The Financial Accounting Standards Board of the Indonesian Institute of Accountants has ratified the Indonesian Financial Reporting Standards Framework (KSPKI) and changes to the numbering of Statements of Financial Accounting Standards (PSAK) and Interpretations of Financial Accounting Standards (ISAK) in the Indonesian Financial Accounting Standards. These changes are intended to distinguish PSAK and ISAK that refer to IFRS Accounting Standards from PSAK and ISAK that do not refer to these standards. The change in numbering does not affect the substance of the regulations in each PSAK and ISAK in the Indonesian SAK.
Impacts on BNI	:	This change does not have a material impact on reporting or substantial impact on accounting policies at BNI and its subsidiaries.

Amendment to PSAK 116: Leases		
Explanation of Changes in Accounting Policies Enacted	:	The amendments to PSAK 116 aim to address the gap in how sellers-lessees should measure right-of-use assets arising from leasebacks. The current amendments to PSAK 116 govern how to measure lease liabilities, sellers-lessees determining 'lease payments' and revisions to lease payments. However, this amendment does not result in sellers-lessees recognizing any gains or losses related to their respective right of use.
Impacts on BNI	:	This amendment does not have a significant impact on BNI and its subsidiaries because BNI's accounting policies are basically still relevant to this amendment.

Amendment to PSAK 201: Presentation of Financial Statements		
Explanation of Changes in Accounting Policies Enacted	:	The amendment to PSAK 201 clarifies one of the criteria in classifying liabilities as long-term, requiring an entity to have the right to defer settlement of the liability for at least 12 months after the reporting period. When an entity classifies a liability arising from a loan agreement as a long-term liability and the liability is subject to covenants that the entity must comply with within twelve months of the reporting date, then the entity shall disclose information in the notes that enables users of the financial statements to understand the risk that the liability will be repaid within twelve months of the reporting period.
Impacts on BNI	:	This amendment does not have a material impact on reporting or substantial impact on the accounting policies of BNI and its subsidiaries.

Amendments to PSAK 207: Cash Flow Statement and PSAK 107: Financial Instruments: Disclosures		
Explanation of Changes in Accounting Policies Enacted	:	Amendments to PSAK 207 and PSAK 107 that require specific disclosures about Supplier Finance Arrangements (SFAs). These amendments respond to investors who have expressed a strong need for more information about SFAs in order to assess how these arrangements affect an entity's liabilities, cash flows, and liquidity risk.
Impacts on BNI	:	This amendment does not have a material impact on reporting or substantial impact on accounting policies at BNI and its subsidiaries.

Bank Health Level

Bank Health Level (TKB) is the result of a condition assessment conducted on a Bank's risk and performance. Amongst the benefits of the Bank Health Level assessment are identifying issues early, determining future business strategies, preparing and taking corrective actions for weaknesses/issues found, providing a basis for the process of linking capital to risk as one of the bases in decision-making, and increasing competitiveness.

BNI Health Level Assessment is carried out in accordance with Financial Services Authority Regulation (POJK) No. 4/POJK.03/2016 dated January 26, 2016 concerning Assessment of the Health Level of Commercial Banks and Ministerial Regulation (Permen) for State-Owned Enterprises (BUMN) No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.

A. Bank Health Level Based on Financial Services Authority (OJK) Regulations

Based on the provisions of POJK No.4/POJK.03/2016, the assessment of the Bank's Health Level is carried out using a risk approach (Risk-based Bank Rating) both individually and on a consolidated basis, with the scope of the assessment carried out based on the following 4 (four) factors:

1. Risk Profile
   Risk Profile Assessment is carried out by assessing the Inherent Risk (risk inherent in the Bank's activities) and the Quality of Risk Management Implementation (KPMR) for 8 types of risk.
2. Governance (Good Corporate Governance)
   Governance Assessment is an assessment of the quality of Bank management regarding the implementation of Governance principles.
3. Profitability (Earnings)
   Assessment of the profitability factor includes evaluation of profitability performance, profitability sources, sustainability of profitability, and profitability management.
4. Capital
   Assessment of capital factors includes evaluation of capital adequacy and capital management adequacy. In assessing capital adequacy, BNI links capital adequacy to its risk profile.

Bank Health Level Assessments are reported to the regulator (OJK) every 6 months (semesterly) in the June and December periods. The result of Bank BNI Health Level assessment for the period December 31, 2024, is presented in the following table:

Assessment Factor	Assessment (Rating)	
	As of December 31, 2024	As of December 31, 2023
Risk Profile	2	2
Good Corporate Governance	2	2
Earnings	2	2
Capital	2	2
Bank Health Composite Rating	2	2

The results of the Bank BNI Health Level assessment for the period December 31, 2024 are ranked "Healthy", which means that:

1. BNI's condition is generally healthy, so it is considered capable of facing significant negative impacts from changes in business conditions and other external factors.
2. The rating of the assessment factors (Risk Profile, Governance, Profitability and Capital) is generally good. If there are weaknesses, then in general these weaknesses are less significant.

B. Bank Health Level Based on the Regulations of the Ministry of State-Owned Enterprises (BUMN)

Based on BUMN Ministerial Regulation No. PER-2/MBU/03/2023, Bank Health Levels are assessed using Ratings which are based on ratings carried out by National Rating Companies, International Rating Companies, and National Rating Companies affiliated with International Rating Companies.

The rating carried out to assess the Bank's Health Level is carried out 1 (one) time in 1 (one) year based on the performance of the consolidated audit financial report for the relevant financial year and submitted to the Ministry of BUMN no later than May of the current year.

In order to comply with Article 80 paragraph (1) of the Minister of State-Owned Enterprises Regulation Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises, Bank Health Level Assessment through Ratings is carried out by the International Rating Agency (Fitch Ratings, Moody's, and S&P) and the National Rating Agency (Pefindo) with the Health Level results for PT Bank Negara Indonesia (Persero) Tbk as follows:

Final Rating

Rating Agency	Rating	Health Level	Classification
Fitch Ratings	BBB-/Stable	AAA	Very Healthy
Moody's	Baa2/Stable	AAA	Very Healthy
S&P	BBB/Stable	AAA	Very Healthy
Pefindo	idAAA/Stable	AAA	Very Healthy

Thus, the Soundness Level for PT Bank Negara Indonesia (Persero) Tbk is AAA with a Very Healthy classification.

PMN Additional Use Report

During 2024, BNI did not receive any additional State Capital Participation (PMN).

Implementation of National Strategic Projects or Other Assignments

Throughout 2024, BNI did not record any National Strategic Project (PSN) or other Government assignments. Information regarding other assignments carried out by BNI has been fully described in the TJSL chapter of the special assignment sub-chapter in this Annual Report.

Legal Basis	Year of Commencement of Assignment	Assignment from the Government	Compensation	Description
PKS No. 02/5.4/PKS/HK.01/01/2024 and No. INS1/004/PKS/2024	2017	Distribution of Social Assistance for the Basic Food Program	Third party fund	Total Beneficiaries: 5,757,453 Nominal: IDR13,556,445,600,000
PKS No. 4/3.4/HK.01/1/2024 and No. INS1/006/PKS/2024	2016	Distribution of Social Assistance for the PKH Program	Third party fund	Total Beneficiaries: 2,781,066 Nominal: IDR7,264,380,958,326
PKS No. HK.01.03/A/651/2024	2023	Distribution and Management of Health Operational Assistance Funds for Health Centers in the 2024 Fiscal Year	Third party fund	Total Beneficiaries: 9,709 Health Centers Nominal: IDR8,100,000,000,000
PKS No. 11/PMO/PK.PKP/PKS/08/2021 and No. DIR/612.1	2020	Distribution of Incentive Funds in the Pre-Employment Card Program	Third party fund	Total Beneficiaries: 1,530,968 Nominal: IDR6,430,065,600,000 Fiscal Year 2024

05

Business Support Function

Human Capital	416
Information Technology	432
Information Technology Governance	444
Service Digitization	451
Services and Networks	459
Customer Experience Center	460
Data Management & Analytics	463
Service Quality Function	466



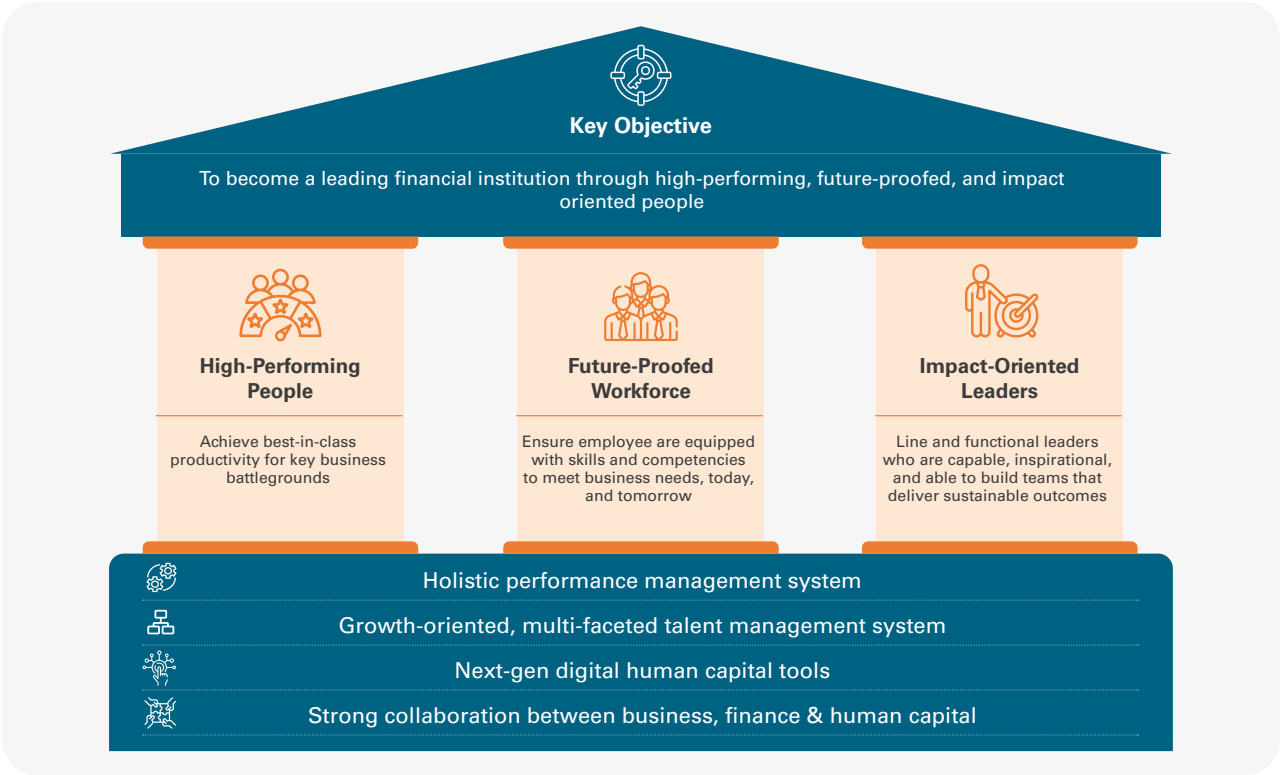
Business Support Function


BNI

Human Capital

HUMAN CAPITAL ROADMAP

BNI has prepared a Corporate Plan to realize the vision of "Becoming the Leading Financial Institution in Sustainable Service and Performance". One part of the Corporate Plan is the Human Capital aspect, which in 2024 will be compiled into the Human Capital (HC) Roadmap as an integrated Human Capital management strategy. The stages of preparing the HC Roadmap in 2024 include three phases, namely the "Diagnose", "Design", and "Deliver" phases. The "Deliver" phase will begin in 2025.

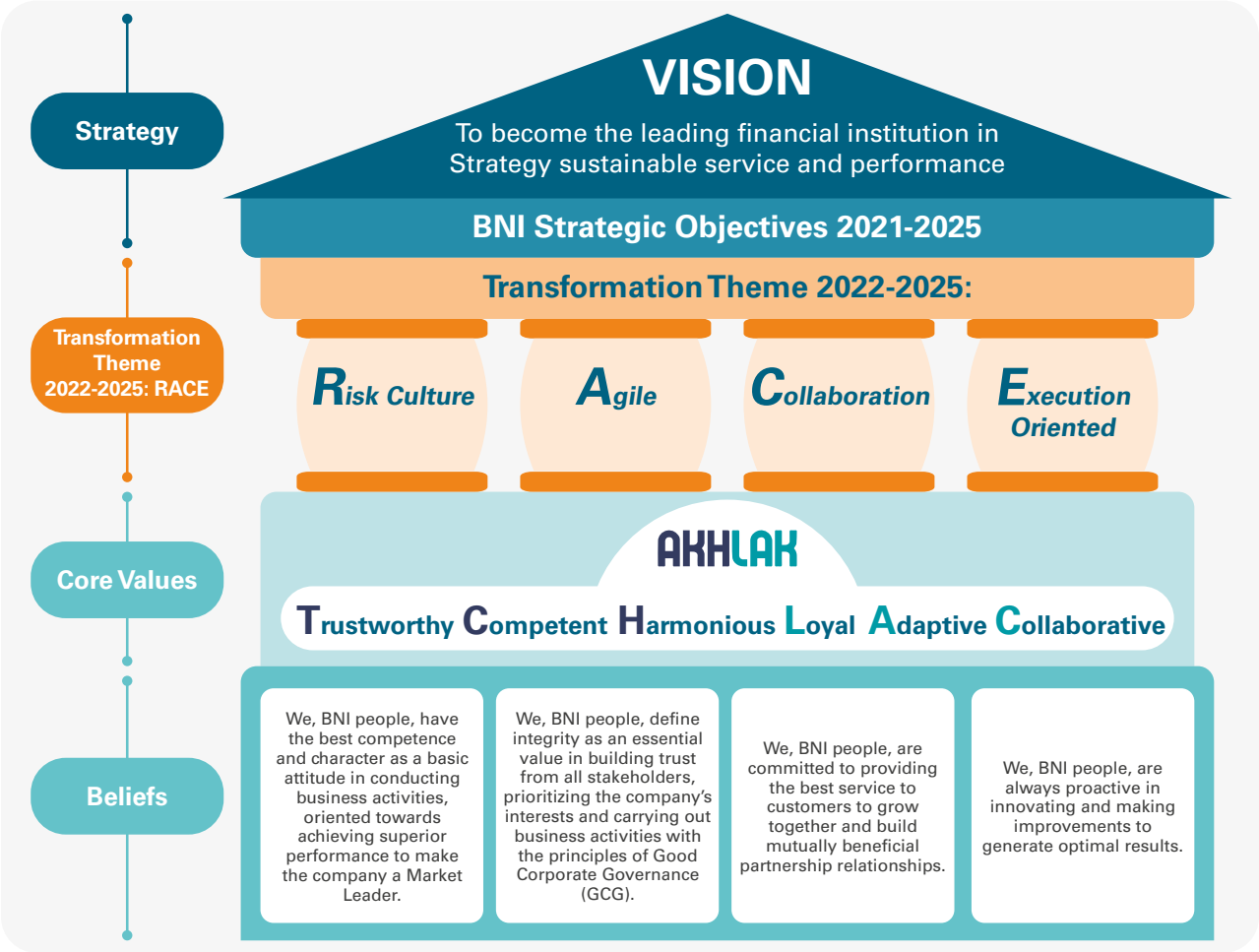


By implementing the HC Roadmap, BNI ensures that human capital management aligns with best industry practices to provide value for the company's business while boosting the achievement of its vision and goals. In general, the components in the BNI HC Roadmap consist of:

1. **Key Objective:** The goal of HC management is to ensure BNI's vision is achieved through high-performing employees and impactful leaders for the team and the company.
2. **High-Performing People:** Productive employees according to their respective functions and responsibilities.
3. **Future-Proofed Workforce:** Employees who are prepared to have the skills and competencies to meet current and future business needs.
4. **Impact-Oriented Leaders:** Competent, inspirational leaders who can build their teams to produce optimal output.
5. **Enablers:** The HC Roadmap is supported by enablers as a foundation consisting of holistic performance management policies, talent management policies, development of human capital tools & technology and supported by strong collaboration from business, finance, & human capital units.

While running the above, in 2024, BNI remained focused on driving sustainable business growth through the transformation of work culture initiated in 2023 and strengthening well-being programs to drive employee productivity.

CULTURAL TRANSFORMATION TO DRIVE SUSTAINABLE BUSINESS GROWTH



Since 2023, BNI has had a BNI Cultural Transformation Management framework implemented and monitored to date. The main components of the framework are:

1. Transformation theme, a cultural element that is considered important and needs to be the focus in the BNI Transformation process so that BNI can #LeapHigher.
2. Core Values, principles that are believed to be important in running the BNI organization, as well as being the identity and glue of the SOEs Work Culture to support continuous performance improvement
3. Belief, a hypothesis/assumption/matter that BNI believes to be something good and true, formed by experience and direct behavior.

BNI is optimistic that these three aspects drive a sustainable performance growth to realize its strategic objectives and stated Vision.

BNI knows very well that effective internalization of cultural transformation requires the support of change agents who can act as role models. The RACE Network team has been established to act as a change agent network mainly tasked with internalizing work culture transformation to BNI & BNI Group.

WORK CULTURE TRANSFORMATION MILESTONE



2022
Development of a framework for work culture transformation through leadership alignment culture transformation.



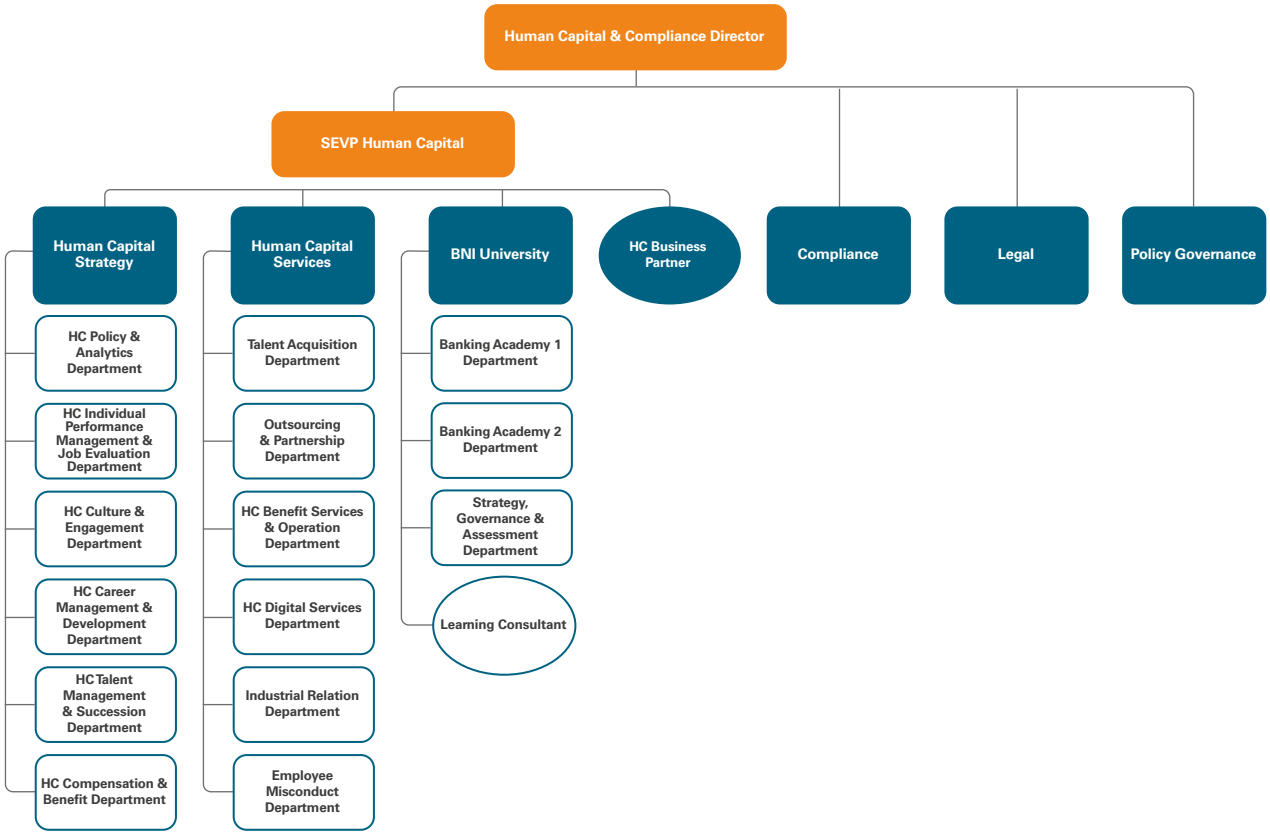
2023 – 2024
Launching of work culture transformation management framework & preparation of unit work culture program along with the formation of RACE champions (culture change agents) and debriefing through trainee for trainer program.



2024 & Beyond
Continuous monitoring by conducting culture site visits, Focus Group Discussions, Implementation Program Presentation & Implementation of BNI Culture Fest. Internalization of the cultural program that has been initiated is then monitored to ensure its sustainable implementation with one of the transformation milestones carried out this year being BNI Culture Fest.

BNI HUMAN CAPITAL MANAGEMENT ORGANIZATION STRUCTURE

BNI has a Human Capital management organization under direct oversight of the Human Capital & Compliance Director and SEVP Human Capital. BNI's Human Capital management organization consists of the Human Capital Strategy Division with the authority to determine Human Capital policies, the Human Capital Services Division that plays a role in operationalizing Human Capital policies, BNI University that is responsible for developing employee capabilities, and HC Business Partner that functions in carrying out its role as a strategic partner. In running its functions while ensuring they align with the company's strategy and objectives, the HC function collaborates closely with the business and finance functions.



EMPLOYEE PROFILE

As of December 31, 2024, BNI had a total headcount of 27,203 employees, down 367 employees or 1.3% compared to the figure of December 31, 2023, when the Bank had 27,570 employees. The size of BNI's workforce in 2024 aligned with its corporate strategy to increase productivity, which was paired with the optimization of business process improvements & service digitalization. This is reflected in employee productivity as measured based on the earning per employee (EPE) measurement matrix of IDR779.6 million/employee or an increase of 3.4% from 2023.

Further information about the profiles of BNI employees is available in the Company Profile Chapter in this Annual Report.

IMPLEMENTATION OF THE HUMAN CAPITAL MANAGEMENT STRATEGY IN 2024

In 2024, BNI's Human Capital management strategy was focused on how to enhance employee productivity by strengthening performance culture as the Bank executed an end-to-end human capital strategy that covered strategic workforce planning, discipline performance management, learning & development, career management, reward & recognition, and employee well-being.

Increasing Employee Productivity Through Performance Culture

The achievement of the Company's strategy and business certainly depends on the efforts and role of employees (Hi-Movers) in increasing their productivity. BNI's performance cycle is a continuous cycle consisting of Goal Setting to determine intended performance targets, Performance Driving aimed at driving performance achievement, and Performance Evaluation as a mechanism for evaluating employee performance.

Optimal productivity starts with transparent, measurable, and sustainable performance management. A utilized performance monitoring tools let managers monitor their unit's performance periodically based on accurate data.

Besides, we realize that humans remain the most important element in supporting performance development. Hence, we have integrated coaching into the performance management process, with a central role by line managers.

As ones that understand the dynamics of their own units, line managers are trained to provide coaching effectively. Here, not only do they help employees understand their unit's strengths and challenges, but they also act as mentors who provide practical

guidance in achieving performance targets. With a personal and solution-based coaching approach, line managers can create a work environment that encourages collaboration, innovation, and team growth.

This integrated approach is one aspect that can encourage employee productivity through increasing overall unit productivity, more timely project completion, and employee satisfaction with the performance management process. It also brings more harmonious relationship between line managers and their units, helping to create an inclusive and results-oriented work culture.

Strategic Workforce Planning Aligned with BNI's Business Strategy

For it to appropriately respond to evolving banking business trends and future challenges, BNI needs highly competent human resources that can compete at both national and global levels. One priority is to ensure we have employees in each function to help BNI achieves its business strategies. Consistent with these strategies, this year's workforce planning focused on strengthening corporate and international banking, IT, and digital business while increasing CASA and FBI.

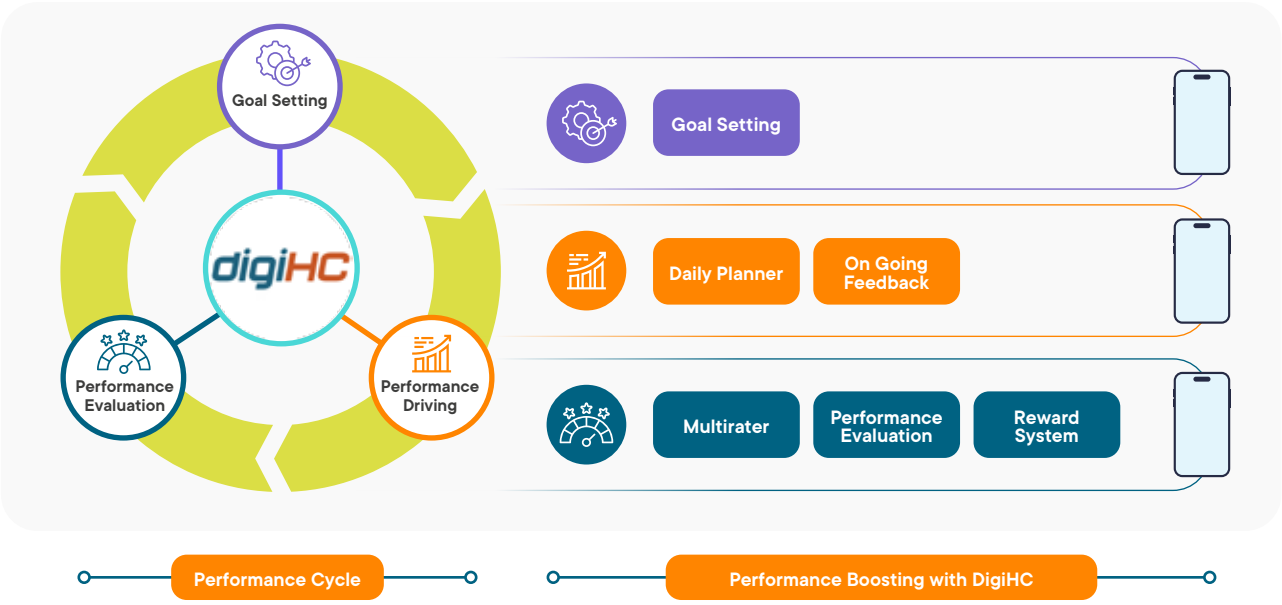
BNI pairs this effort with recruitment through several programs, including the Officer Development Program (ODP) and the Assistant Development Program (ADP).The program's objective is to ensure the Bank has adequate talents to meet current business needs and to develop these talents into its future leaders.

Employee recruitment is carried out through a number of sourcing channels to get the best employees who will have a career with BNI, including:

1. Campus hiring with partnering universities.
2. Collaboration with government offices like Ministry of SOEs, Education Fund Management Institute (LPDP), diaspora student associations.
3. Early Recruitment Program (ERP) which is a special recruitment path through providing scholarships to outstanding students from leading universities to become prospective BNI employees.
4. Ministry of SOEs programs such as the Joint SOE Recruitment Program (RBB) as a form of BNI's commitment to providing employment

End to End Performance Cycle Supported by Integrated Applications

In alignment with the strengthening of performance culture, all stages of the performance cycle at BNI are supported by DigiHC, a digital platform accessible to all employees via their gadgets. The use of this application enables employees to monitor and manage their performance in an integrated manner.



Leaders Succession through Growth Oriented & Multi-Faceted Talent Management System

This year, we are committed to continuing to strengthen our talent management strategy for the succession of future leaders who are resilient, adaptive, and able to face dynamic business challenges. Through a growth-oriented and multi-faceted talent management system, we create an integrated, relevant, and organizationally appropriate development ecosystem. In 2024, some career development programs were implemented, including:

1. **Competency Enhancement**
   As an initial step, we've been running a Competency Enhancement Program by compiling a new competency dictionary that aligned with the organizational strategic needs. This competency dictionary not only covers technical skills (hard competency), but also leadership and behavioral competencies (soft competency) as the foundation for end-to-end human capital management, including employee recruitment, development, and promotion processes. The objective of this competency dictionary compilation is to ensure that each individual had clear guidance to improve their capabilities in accordance with business demands and organizational transformation.

   In this renewed competency, BNI has set two categories of competency size: the 9 wondrs or 9 competencies that all employees ought to possess and role specific competencies as competencies that everyone needs to effectively discharge their respective tasks and responsibilities in relation to a particular role or position.

2. **Individual Development Plan**
   To support the individual development journey, we've implemented a personalized Individual Development Plan (IDP) according to the needs of each employee. The IDP has been designed to help employees identify development goals, training opportunities, and relevant exposure. With an approach that focuses on individual needs, BNI ensures that each employee had clear guidance to optimize their potential.

   BNI makes it mandatory for each employee to prepare an Individual Development Plan (IDP) consisting of hard competency, soft competency and leadership competency based on the assessment results. Furthermore, employees will have a one-on-one discussion with their direct superiors to settle on which development plan both will run in the following year. The IDP data offers guidance for BNI University in providing capability improvement programs that are in line with employee needs.

3. **Career Acceleration**
   Consistent with KBUMN's mission and the company's strategy to facilitate young talents with qualified competencies to fill leadership positions, BNI offers a career acceleration program. This program is a designated path that allows employees to get promoted to higher positions in a shorter period of time than the standard. Participating employees are selected strictly to ensure that they have the competency and learning agility. This program should give the talents direct access to opportunities that can prepare them for broader leadership roles in the organization.

4. **Global Postgraduate Program (GPP)**
   To increase BNI employees' competitiveness so they have competence at the global level, BNI gives its best talents the opportunity to develop themselves granting Masters Scholarships at the Top 30 Best Universities in the World. As part of our efforts to build leaders with global insight, we continue the Global Postgraduate Program (GPP). This program gives opportunities for talented employees to continue their postgraduate education at leading universities in the world. Through GPP, we equip participants with global insight, international networks, and the ability to face business challenges on an international scale.

5. **Succession Planning**
   While focusing on individual development, we also strengthen the succession planning process as part of our comprehensive talent management strategy. Succession planning is designed to identify, develop, and prepare potential employees who assume key roles in the organization. This process is run systematically by involving evaluation of competency, performance, and potential, and matching them with long-term business needs.

Through integrated succession planning, BNI not only ensures leadership succession in the future, but also creates opportunities for talent to develop. This is an important part of building organizational stability and resilience amidst dynamic business changes.

6. **Self Development Program (SDP)**
   In addition to supporting employee capability improvement through Study at Top 30 Global Universities, BNI also supports employees who wish to complete tåheir Bachelor's, Master's, and Doctoral degrees at the best universities in Indonesia independently through the Self Development Program.

7. **Executive Development Program for BOD - 1**
   BNI has prepared a special development program for employees at the BoD-1 level through a series of executive training in collaboration with prominent global business schools and coaching/ mentoring with professionals and senior leaders from leading companies.

Employee Competency Development in Supporting Business Productivity

To support continuous performance improvement and global competitiveness, BNI has prepared a development program that aligns with its corporate vision, mission, and strategy. There has been a change in the mindset of Human Capital management to Co-Creation Centric 20:40:40, by collaborating the roles of **HC Unit** as Strategic Partner (20%), **Leader** as Coach (40%), and **Employee** as Performer (40%). Hence, as part of HC management in employee development management, we have divided responsibilities between employees as the main focus of development, direct superiors as coaches who give motivation and explore their potential, and the Human Capital Team as a strategic partner that synergizes all infrastructure and elements that help develop employee capabilities.

Employee development management is carried out to fulfill 3 Aspects of Employee Development consisting of Hard Competency (Knowledge and Skill), Soft Competency (including Behavioral Competency and Motivation), and Leadership Competency based on the Learning Value Chain (LVC), with the following stages.

No.	Stages	Description
1.	Learning Need Diagnostic	Conducting employee development needs analysis, based on the Development Need Analysis (DNA) and Learning Need Analysis (LNA) processes.
2.	Learning Design & Development	Developing development programs based on employee competency gaps according to level and position, both for current and future roles.
3.	Learning Delivery & Deployment	Implementing development programs by paying attention to the proportions: 10% (Formal Learning) – 20% (Social Learning) – 70% (Experiential Learning).
4.	Learning Impact Measurement	Conducting an evaluation of the learning process that has been carried out based on the response to learning, increased knowledge, changes in attitude, to the impact on achieving business targets. The evaluation results will serve as the basis for making continuous improvement at each stage in LVC.

In addition to the learning impact measurement mentioned above, an evaluation of the use of the education and training budget is periodically made to show the total realization of training costs for all employees and training costs per employee. This is done to ensure that the use of the budget complies with regulatory provisions and the selection of the best delivery method (best practices).

There are various learning infrastructures that are used in the process of improving employee competency, especially to instill a culture of Self Directed Learning. One of the digital platforms used in the development process is BNI Smarter as the main learning media for all BNI employees in addition to collaboration with well-known Digital Learning Platforms such as GoFluent, LinkedIn Learning, Moody's, and so on.

To prepare employees who are future ready and global savvy, BNI University also collaborates with various other International Educational Institutions such as IMD, Harvard Business School, Columbia Business School, and so on for selected talents to prepare employees as BNI Future Leaders.

LEADERSHIP DEVELOPMENT PROGRAM TESTIMONY



HESTI NATALIA LODOROHI
Branch Business Manager
Ende Branch,
Regional Office 08

I would like to express my sincere gratitude to BNI for providing this opportunity. It is truly an honor for me to participate in the Firstline Management Leadership Program (FMLP). Each training session was highly engaging, with interactive discussions that offered a wealth of new perspectives. As a leader, I now understand that success is not just about the results, but also about appreciating every step of the process. A team develops through the process, and it is essential for us to actively participate in this journey to build a team grounded in integrity, intelligence, and energy.

As Jack Welch said, "Before you are a leader, success is all about growing yourself. When you become a leader, success is all about growing others."

As leaders, we must inspire our teams and guide them towards meaningful goals. When they have a clear sense of purpose, they will take full responsibility for their work. There is no fixed formula for leadership, but one thing is certain: a leader is responsible for the people (the team) who are accountable for the results.

Through programs like this, BNI, via BNI University, is laying the groundwork for future leaders who will help BNI grow stronger, more resilient, and bigger in the face of the ongoing challenges and changes, both from within and outside the organization.

BRANCH MANAGEMENT COURSE PROGRAM TESTIMONY



HENDRO WIDIARTO
Branch Manager
Malang Branch,
Regional Office 18

The Branch Management Course (BMC) provided an invaluable learning experience that significantly changed my approach to my role as Branch Manager at one of BNI's branches. The training program equipped me with comprehensive, practical knowledge. With its relevant and in-depth curriculum, I gained a clear understanding of various operational, service, business, and credit-related aspects that had previously been gaps in my capabilities.

I feel incredibly fortunate to have learned directly from instructors who are highly experienced professionals at the RCEO level, General Managers, and even Directors, as well as experts in management and business. Their insights were not only practical but also provided me with a strategic perspective on how to manage a branch holistically.

I learned how to make data-driven decisions while remaining sensitive to the needs of my team and customers. The materials presented not only enhanced my professional competencies but also improved my technical skills and broadened my understanding of effective leadership. This training is a valuable investment that has truly prepared me to face challenges and lead my branch toward greater achievements.

Optimum Reward & Remuneration Strategy

Employee remuneration is adjusted to internal provisions with due consideration of applicable laws so it remains within or above the minimum wage standards set by the government. Determination of the wage structure and scale in the form of a salary range according to the workload is reviewed periodically to ensure BNI's remuneration is competitive in the labor market. The provision of remuneration at BNI does not discriminate against gender, race, or ethnicity but is purely determined based on position and encourages a performance culture.

BNI implements a Reward & Remuneration strategy aimed at increasing effectiveness in attracting, motivating, and retaining targeted talented groups with outstanding performance and competence to support BNI's vision & mission, strategy achievement, and realizing the Employee Value Proposition (EVP). The remuneration philosophy applied by BNI is total rewards, which is a single package of rewards/awards given to employees, both in cash and non-cash.

Supporting Performance Culture through a Harmonized Remuneration Strategy

To support the creation of a performance-based work culture, BNI implements a remuneration strategy that aligns awards with performance achievements. This strategy includes:

- **Periodic Incentive Review:** A comprehensive review of the incentive scheme to ensure relevance and effectiveness in motivating employees to achieve their best performance.
- **Performance-Based Rewards:** Variable reward components, such as annual bonuses, incentives, discretionary bonuses, and retention programs, are given based on evaluations of company, unit, and individual performance.

- **Awards for Outstanding Employees:** BNI appreciates employee contributions through the Best Employee Award and long-service awards, which aim to increase work enthusiasm and create a positive work environment.

Policy Alignment in BNI Group

As part of an integrated group, BNI's Reward & Remuneration policies are aligned with BNI Group to ensure consistency and strategic alignment in supporting common goals. This alignment includes remuneration structures, additional benefits, and employee development programs, thus creating synergy between business units within the group.

Total Rewards Philosophy: FoR MoRe Benefit WE GO [ACGS B.6.3]

The Total Rewards philosophy at BNI is a holistic approach to rewarding employees, including:

1. **FoR (Foundational Rewards),** a fixed income received by employees in the form of fixed salaries & allowances.
2. **MoRe (Motivational Rewards),** a variable reward component given in an effort to increase employee motivation at work and improve performance culture, and is given based on the Company performance, unit performance and individual employee performance, both as a short term and long term reward, and includes annual bonuses, incentives, discretionary bonuses, employee share ownership programs, retention programs, as well as recognition in the form of the Best Employee Award and Long Service Award.
3. **Benefits,** as rewards given in an effort to provide comfort for employees while working at BNI and after work, including health insurance while still active through the health insurance program and mandatory BPJS Health program, as well as preparation of health funds for retirement through the Retirement Health Fund Program (DKMP), as well as benefits for retirement in the form of a Defined Benefit Pension Program (PPMP), and/or a Defined Contribution Pension Program (PPIP), Old Age Security, and Pension Security. For employees who are about to enter retirement age, BNI also provides a Retirement Preparation Period, as well as seminars or workshops related to entrepreneurship, health and financial management to provide for prospective retirees to remain prosperous and productive in retirement.
4. **WE (Working Environment),** a conducive work environment that can influence employee performance, thereby creating a condition that supports optimal performance, including work space, breastfeeding room and sports facilities in the work environment.
5. **GO (Growth Opportunities),** an opportunity given to employees to develop their potential and career, including career development from clerical to officer through the Internal ODP Program, providing Master's Scholarships Overseas, internships at Overseas Offices (KLN), as well as assignments to Subsidiaries and other SOEs.

CREATING AN INCLUSIVE, CONDUCIVE AND PRODUCTIVE WORK ENVIRONMENT FOR ALL EMPLOYEES

Improving Employee Experience through Integrated Digital Infrastructure

BNI has several integrated applications that are intended to improve employee experience and the effectiveness of Human Capital Management, including DigiHC and BNI Smarter. DigiHC is one app for all that BNI Hi-Movers can use daily in human capital, from attendance, surveys, work plans and daily realizations, financial information, and ongoing feedback, to getting information updates on the latest human capital policies.

To improve employee competence, we operate the BNI Smarter application that all employees can use to plan, monitor, and record learning realization according to their development needs.

Appreciation for Outstanding Employees through the Best Employee Award

As a form of appreciation from Management to high-performing employees who have also become role models for their respective work units, on July 3, 2024, BNI held another Best Employee event to reward 50 (fifty) of its employees who had consistently delivered their best for the company. The award-winning ceremony was attended by all members of the Board of Directors and the Board of Commissioners.



EMPLOYEE TESTIMONY



SEPTIAJI TRI WIBISONO

Branch Business Manager – Pekalongan Branch Office – Regional Office 5

The management appreciation through the BEE Award, not only gave me the opportunity to learn and develop directly, but also became a reinforcement of steps to continue learning, growing and giving the best for BNI. Currently, I am given a new mandate to oversee the business and services at the forefront as Branch Business Manager. I am sure this opportunity will be able to increase my sharpness in managing the business and be the best opportunity for my career development in the future.

I would like to thank BNI and all colleagues and leaders at BNI Regional Office 05 who have succeeded in building a positive work environment and continue to motivate me and other Hi Movers BNI to continue to work and achieve.

★★★★★

EMPLOYEE TESTIMONY



A. ARDHIZA SAVITRI

Commercial Banking Relationship Manager Makassar Commercial Business Center Commercial Banking 2 Division

The company's trust given through the "Top 50 BNI Best Employee 2024" award not only makes me feel appreciated, but also strengthens my pride and loyalty to BNI and motivates me to improve my performance and desire to contribute significantly to BNI's progress in the future.

My deepest gratitude for the appreciation that BNI management has given me. This award means a lot and motivates me to continue to give my best in every task and responsibility given.

I am proud to be a BNI Hi-Movers person!

★★★★★

Respectful Working Place (RWP) as an Effort to Create a Safe, Comfortable, and Equality-Respecting Work Environment

BNI highly upholds the principle of equality and dignity of every individual and imposes a strict policy against sexual harassment and discrimination of any form. BNI is committed to creating an inclusive and diversity-respecting work environment by operating a safe reporting channel, running a transparent handling mechanism, and providing continuous education to raise awareness and prevent actions that are against these values.

Following up on the direction of KBUMN through Letter no. SE-1/MBU/01/2024 dated January 18, 2024, BNI has issued regulations in the Company Guidelines Instruction Number IN/013/HCS/001 regarding the implementation of Respectful Working Place (RWP) which aims to create a safe, comfortable work environment, respect and protect human dignity, prioritize mutual respect, free from discrimination, exclusion or restrictions, bullying and harassment and various other forms of violence, both mental and physical, for all BNI Group employees.

Child Labor and/or Forced Labor Policy

As part of its social and ethical responsibility, BNI ensures that its entire operations remain in compliance with national labor laws and international standards that prohibit child labor and forced labor. Through a strict recruitment process and regular audits, BNI fulfils its commitment to protecting workers' human rights and supporting fair and sustainable labor practices.

Commitment to Upholding Human Rights

As a form of responsibility for sustainable and inclusive development, BNI is committed to upholding Human Rights (HAM) in every aspect of its operations. By promoting the values of justice, equality, and transparency, BNI makes sure that all its policies and actions adhere strictly to internationally recognized human rights principles. Through a collaborative approach with stakeholders, BNI has been seeking to create a safe working environment, celebrate diversity, and support protecting the rights of every individual and our surrounding communities. This commitment serves as the foundation on which the Bank can keep the trust of while giving positive impacts to the broader community.

Recruitment of Disabled Employees

One of BNI's efforts to create inclusivity is by preparing a disability-friendly work environment, both in terms of infrastructure and career opportunities. Hence, BNI recruits people with disabilities every year to give everyone from the society, without exception, equal opportunities to work, contribute, and have a career at BNI.

Healthy, Comfortable and Safe Work Environment to Increase Employee Productivity [ACGS B.6.1]

BNI is committed to providing a safe, healthy and decent work environment for all employees. Through the implementation of high occupational safety standards, regular training and adequate health facilities, BNI also ensures protection against work risks while creating a work atmosphere that can support employee welfare. This commitment and initiative are supported by proactive policies to continue to improve the quality of the work environment in order to increase productivity and mutual comfort.

In addition, BNI realizes that one of the important aspects of sustainable and growing employee productivity is strengthening the employee well-being, and therefore, in 2024, BNI initiated an employee well-being program through the BNI Holistic Employee Wellbeing Program which focuses on mental & physical health, financial health and social health.



1. Maintaining Employee Mental and Physical Health

BNI Employee Assistance Program 2.0

BNI Employee Assistance Program 2.0

BNI always strives to provide a healthy, comfortable and safe workplace, through well-being programs, especially programs that can support employee mental and physical health. BNI realizes that mentally and physically healthy employees can work more optimally and productively. In 2024, BNI collaborated with consultants to get their consulting services (employee assistance program) where they developed an app that can be accessed by employees. This application lets employees consult with experts on their mental health and physical health; the app can also create systematic programs to support the improvement of mental and physical conditions that are personalized according to the health needs and objectives of each employee.

BNI Little Explorers

BNI provides employee performance support facilities through BNI Little Explorer Daycare, a program designed for BNI female employees who have mothered children and to support their welfare and productivity. BNI Little Explorer Daycare is a childcare program with comprehensive facilities, including play areas with open-ended toys that can train children's imagination, infrastructure that is guaranteed to be clean and safe, professional staff who pay regular visits from Child Psychologists and Pediatricians and nutritious food made and monitored by Nutritionists. This program also provides a quality curriculum that has been adjusted to the growth and development of children through a routine activity schedule. To maximize employee safety and trust in this program, parents can monitor their children's daily activities through a special parent application that is directly connected in real-time to the daycare area CCTV system.

BNI Little Explorers Daycare Facilities



Front Desk BNI Little Explorers Daycare


Playground

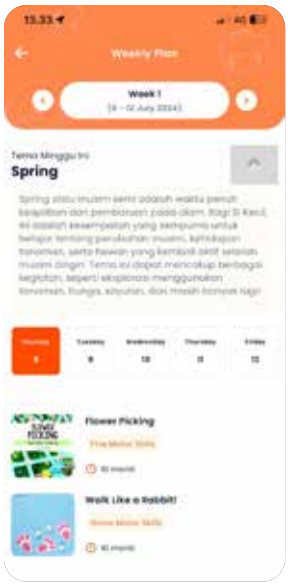

Playground

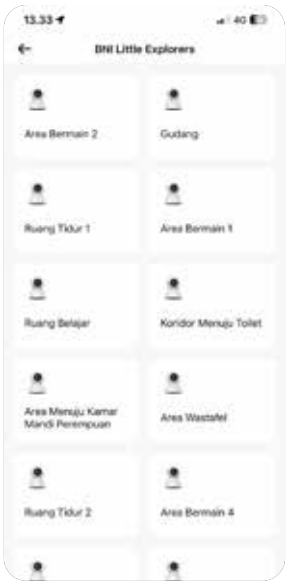

Children's Bedroom


Multifunctional Room


Children's Study Room

Supported by applications that make it easy for employees to monitor children's activities and development while in daycare.









DAYCARE PROGRAM EMPLOYEE TESTIMONY



ANDHIKA NUGRAHA SYAHPUTRA

AMGR Business Development – Business Development Department – Commercial Banking 1 Division

I feel very helped as an employee whose spouse works and does not live in the city, so that we feel calmer and more comfortable leaving our children at a daycare located in the same building as where I work.

In addition to being easy to monitor, the existence of the daycare also greatly helps the child's growth and development process by providing the curriculum provided by the daycare.

This program is very important, especially for employees whose partners also work so that they cannot entrust their children to other people, and this program is expected to continue and be expanded in capacity so that more employees can take advantage of the program.



DAYCARE PROGRAM EMPLOYEE TESTIMONY



ARNI WIJAYATI PURWANDAKA

AMGR Payroll Business Partnership - Payroll Business Value Proposition & Cust. Journey Department - Consumer Segment Division

The benefits of daycare held in the office are getting closer to the child. Reducing anxiety as a working parent while working and being separated from the child temporarily, because now if something happens, you can meet the child more quickly.

With daycare in the office, parents can work more focused because dramas are minimized. I also feel happier because indirectly I have more time to meet the child because we go to and come home from work together.



2. Maintaining Employee Financial Health

To support employee welfare, BNI provides consultation services with financial planners through an application that employees can access. This initiative has been designed to help employees manage their personal finances more wisely and in a planned manner. This program aims to provide not only knowledge but also practical skills that employees can apply instantly to their everyday routines. The ultimate objective is to improve employee financial literacy, create financial stability, and support employee productivity at work.

EMPLOYEE TESTIMONY



AZIZAH YULIA SAFITRI

Retail Relationship Manager - Retail Productive Business Center Jatinegara

This program really helps me in my process of achieving mental, physical and financial health, especially because it is facilitated by Management as a whole and is free of charge where the cost of consulting with professionals is quite expensive.

This program also makes me more aware of myself and feel more supported by management and have a place to tell stories related to professional and personal.



EMPLOYEE TESTIMONY



FARAH DIBA NURAISYAH PUTRIE

AMGR Business Owner Partnership - Business Owner Value Proposition & Customer Journey Dept - Consumer Segment Division

Through the Instinct application, I have the opportunity to consult with experts regarding the often-disturbing emotions I experience, yet struggle to manage. Additionally, I can express my feelings without the concern of them being known by my colleagues. The Employee Assistance Program (EAP) has been incredibly helpful and valuable to me, providing much-needed support.

After consulting with experts in the Instinct application, I can clearly know and be aware of the conditions I am experiencing so that as soon as possible I will restore my mood or overcome the unpleasant feelings that are felt so that they do not affect my performance in the work environment.



Retirement Health Fund (DKMP): Healthy Investment for a Prosperous Future [ACGS B.6.3]

BNI understands that retirement is when employees get to enjoy the fruits of their labor and live a comfortable and peaceful life. One of the challenges employees usually find after retirement is how to continue having access to quality health services. Addressing this need, BNI presents the Retirement Health Fund (DKMP), an innovative program designed to provide comprehensive health protection for employees after they retire.

As old age requires more health services, DKMP has been presented as a strategic solution to ensure that employees not only have access to financial protection but also live a peaceful life long after retirement. DKMP provides benefits in the form of guaranteed access to health care, reducing concerns about unexpected health costs and helping employees enjoy retirement with optimal quality of life.

3. Maintaining Social Health

BNI believes that building a healthy balance between work and personal life can create a conducive work environment to increase employee productivity. One effort to encourage and realize this is forming a community for employees, with the aim of facilitating the employees in expressing their hobbies and talents while maintaining their physical and mental health.

BNI has more than 25 employee communities of different interests collectively run under one forum called the "46 Society." It is a designated forum that not only lets employees collaborate, but also allows them to prove themselves at events where they get to represent BNI.

COMMUNITY TESTIMONY



46 VOLI

Persatuan Bola Voli BNI 46 (PBV BNI 46) is a community that facilitates employees in developing their volleyball talents and interests, while also fostering team spirit, work-life balance, and enhancing BNI's image through both internal and external competitions.

In carrying out community activities, we consistently apply collaboration with all units across each region and maintain effective and efficient communication with BNI Management. This approach ensures we consistently achieve positive results, while also promoting health and motivation in our daily work.

We are deeply grateful to BNI 46 for its unwavering support of the employee volleyball community. This support not only strengthens our enthusiasm but also enhances our playing skills and strengthens the bonds of friendship among team members. We take pride in being part of the BNI 46 team, which values the balance between work and personal hobbies. Thank you for this opportunity!

COMMUNITY TESTIMONY



46 CYCLIST

Since its establishment, 46Cyclist has reached its 12th anniversary, with BNI Management consistently providing support, both financially and through facilitating necessary permissions. Several major events organized by 46Cyclist have been attended by representatives of Hi-Movers Cyclists from all BNI Regional Offices and the Headquarters.

The goal of founding 46Cyclist was to promote physical fitness through cycling activities, which contribute to increased productivity among Hi-Movers, strengthen relationships between employees across different units/divisions/branches, reduce the gap between management levels and staff, and promote cycling as a key sport within BNI (embodying BNI's "Go Green" program and "Bike to Work" initiative).

The Hi-Movers Cyclists, whether engaging in large or small group activities or individual cycling, experience increased happiness, satisfaction, and benefits for both physical and mental health. Hi-Movers Cyclists with a high level of well-being are better equipped to face challenges and obstacles in their daily work, socialize effectively, and manage stress efficiently.

IMPACT ON HUMAN CAPITAL MANAGEMENT STRATEGIC INITIATIVES IN 2024

All the strategies and initiatives BNI executed in running its Human Capital throughout 2024 had a key objective of producing Highly Engaged & Highly Productive Employees, consistent with its Human Capital management framework. We can see the positive impacts of the strategy execution and initiatives in the higher score of 35% in Employee Engagement Score (EES) from 34% earned in the previous year.

The realization of total headcount in 2024 was 27,203 employees with an increase of employee productivity of IDR779.6 million/employee or increase of 3.4% measured based on the earning per employee (EPE) measurement matrix 2023.

APPRECIATION AND AWARDS IN 2024

BNI spends each passing year with continuous participation in activities involving external parties both nationally and internationally to evaluate its Human Capital management. In 2024, BNI again garnered appreciation and awards in Human Capital management, including the following:

1. Forbes World's Best Employer - Forbes
   PT Bank Negara Indonesia (Persero) Tbk (BNI) made an achievements when it was named amongst the World's Best Employers 2024 released by Forbes, or in 718th place. This recognition confirms BNI's commitment to creating a superior work environment and supporting employee welfare and career development
2. Best Employer Brand - LinkedIn Talent Award
   In the 2024 LinkedIn Talent Awards for the category of Companies with over 10,000 employees, BNI was named one of the companies leading the future of the world of work by demonstrating adaptability, innovation, and creativity.
3. Indonesia Human Capital Award X – Economic Review
   In this activity, BNI won 3 (three) awards, namely:
   - The Best Human Capital Director – 2024
   - Best Company in Strategic Sustainability 2024
   - Best Company in Human Capital 2024
4. Stellar Workplace Award 2024 – Kontan & OneGML
   - Stellar Workplace Recognition in Employee Commitment
   - Stellar Workplace Recognition in Employee Satisfaction

STRATEGIC INITIATIVES FOR HUMAN CAPITAL MANAGEMENT IN 2025

Aligned with the Human Capital Roadmap 2025–2029, the year 2025 marks a pivotal moment for BNI to strengthen Human Capital (HC) management as a strategic element in supporting the success of dynamic business transformation. Human Capital must take a proactive role in formulating policies and initiatives that align with the company's strategy, effectively address challenges, and seize opportunities to drive sustainable business growth.

1. Improvement of Performance Management Policy
   Encouraging optimal performance through structured and data-based performance management, through:
   - Improvement of the end-to-end performance management cycle that includes goal setting, performance driving, and performance appraisal
   - Improvement of the capabilities of first-line leaders in managing the performance of their units.
2. Strengthening Recruitment and Onboarding Programs
   Aiming to obtain the best talent with a fast and accurate recruitment process according to the needs of the organization by:
   - Increasing collaboration between Human Capital and units in implementing recruitment.
   - Optimizing the onboarding process to accelerate the adaptation and productivity of new employees.
3. Improvement of employee career management policies
   This initiative aims to provide career competence-based paths (including generalists & specialists) through AI to improve career management policies while ensuring alignment with organizational needs.
4. Improving Employee Capabilities
   Improving employee competencies to support business achievements, including through training programs tailored to individual and organizational competency needs analysis.
5. Improvement of Strategic Workforce Planning
   Ensuring appropriate workforce planning in line with digital transformation and business process improvement
6. Strengthening Programs of Culture and Risk Culture
   Shaping a work culture that aligns with the company's values and vision, through:
   - Re-alignment of BNI's cultural program.
   - Strengthening risk culture to support good governance.
7. Optimizing total rewards
   Increasing employee satisfaction and motivation through competitive total reward policies and encouraging performance culture
8. Advancing Human Capital Technology & Digitalization
   Optimizing the use of technology to support the efficiency and effectiveness of Human Capital management.

Information Technology

INFORMATION TECHNOLOGY IN BNI BUSINESS ACHIEVEMENT AND TRANSFORMATION

To strengthen competitiveness and business growth in the digital era, Information Technology (IT) plays an important role in BNI's business achievement and transformation. IT supports BNI's business transformation in terms of operations, improving customer service and creating innovations that are relevant to increasingly dynamic market needs.

During 2024, BNI continued to carry out various initiatives to support digital transformation, which referred to the Corporate Plan to answer the need for business expansion and optimize operations. With the aspiration statement "4-t-6 Technology Formula of Transforming BNI with IMPACT" or abbreviated as "46 with IMPACT", the vision, mission and main IT program are formulated which will be a reference in mapping IT projects in the next 5-year strategic plan. BNI's IT initiatives focus on 4 (four) IT missions, namely Enterprise Agility to quickly adapt to market and environmental changes in a productive manner, Data Driven Transformation where decisions, actions and business processes are guided by insights gained from data analysis, Future-Proof Innovation to remain relevant and effective with future market needs, and Revolutionize Beyond Ecosystem to include cross-industry collaboration in the use of new technologies.

BNI's IT plays an active role in fulfilling IT solution support for business needs, especially in the context of supporting BNI's business achievements and transformation. This has been demonstrated by increasing IT investment with the CAPEX budget increasing by 154% which was fully absorbed according to the IT budget planning. This IT investment was used to resolve business demands and prepare Reliable, Available, Scalable and Secure (IT RASS) IT capabilities.

BNI INFORMATION TECHNOLOGY VISION AND MISSION

VISION

To be the primary enabler in driving BNI's transformation towards sustainable business growth.

This vision is in line with BNI's vision, namely "Becoming the Leading Financial Institution in Sustainable Service and Performance". IT as an enabler supports BNI in realizing its vision to become the leading financial institution in service and performance by encouraging BNI to transform for sustainable business growth by providing the best experience for customers and increasing overall efficiency.

MISSION

1. **Fostering Core of Excellence with Enterprise Agility**
2. **Catalyst for Data Driven Transformation**
3. **Fortify Resilience with Future-proof Innovation**
4. **Revolutionize beyond Ecosystem**

The elaboration of the IT Vision is conveyed in 4 BNI IT Missions, as follows:

1. **Fostering Core of Excellence with Enterprise Agility**
   This mission relates to efforts to increase productivity through sustainable initiatives including HR transformation, increasing collaboration between teams, centralizing work functions in certain areas (Center of Excellence), and adopting an agile approach in IT organizational activities in order to build a strong foundation for BNI in its sustainable transformation journey.

2. **Catalyst for Data-Driven Transformation**
   This mission relates to the role of IT as a key driver in changing the way banks operate by maximizing data, where IT is not only a technical supporter but also a catalyst in changing organizational culture, business processes, and data-driven decision-making. By utilizing data effectively, banks can make better business decisions, improve efficiency, provide a more personalized customer experience, and increase competitiveness and relevance in the digital era.

3. **Fortify Resilience with Future-proof Innovation**
   This mission relates to efforts to strengthen the bank's resilience to various risks, both from within and outside the organization. This includes the ability to deal with disruptions, regulatory changes, cyber-attacks, and other business uncertainties. In its implementation, this is supported by technological innovations that are not only relevant today but can also survive and thrive in the future.

4. **Revolutionize beyond Ecosystem**
   This mission relates to efforts to carry out innovative transformations beyond the boundaries of the traditional banking ecosystem. With this mission, BNI continues to develop through innovative propositions and seeks new opportunities outside conventional banking services with ecosystem expansion, which can also help BNI maintain its competitive advantage.

BNI INFORMATION TECHNOLOGY EXCELLENCE

BNI's advantages in IT have supported BNI's business continued growth, and includes:

1. IT Maturity Level 4 (Predictable)
   To support the achievement of business objectives through the effective and efficient use of information technology, BNI implements the COBIT 5 and COBIT 2019 frameworks as references for IT governance and management. Success in the application of these COBIT frameworks is measured as the level of IT Maturity, which indicates how well IT practices are applied and integrated.

   BNI's IT Maturity has been successfully maintained at a capability level of 4 (predictable) through periodic evaluations, continuous improvement efforts, management commitment to support these enhancement initiatives, employee training and competency development, increased awareness and ownership of IT governance, as well as performance monitoring against relevant KPIs. This demonstrates that BNI's IT processes and governance are in line with best practices. This is supported by efforts to enhance IT Maturity through fulfilling gaps in assessment results, including meeting obligations to regulators and shareholders.

2. INDI 4.0 Level 4 (Already Implemented)
   In order to fulfill the implementation of the Indonesia Industry 4.0 Readiness Index (INDI 4.0) assessment for State-Owned Enterprises (BUMN) as outlined in the MoU between KBUMN and the Ministry of Industry No. MoU-03/MBU/04/2021 No. 1 of 2021, BNI has conducted a self-assessment of INDI 4.0 and reported the results to the Ministry of SOEs as of December 30, 2024, with a level 4 result (level: already implemented). The monitoring of INDI 4.0 achievement can be fulfilled through periodic evaluations and adaptations to changes in the business environment, continuous investment in technology, and human resource development, including the establishment of an innovation and creativity culture, as well as implementing strong governance. The success in maintaining the INDI 4.0 level demonstrates BNI's readiness as a bank that complies with industry standards.

3. Disaster Recovery Capability
   To ensure the continuity of IT operations, including in the event of disasters or mass disruptions, BNI utilizes a disaster recovery backup system, with placements at separate data centers functioning as a Disaster Recovery Center (DRC) and with redundancy configurations functioning as High Availability (HA). Furthermore, to ensure the readiness of the backup system in facing emergency conditions, testing of the operation switch from the main system to the secondary or backup system (Switch Over) and back to the main system (Switch Back) is conducted. The Switch Over and Switch Back (SO-SB) activities are performed to test the secondary or backup system in running services, especially for critical and transactional applications. This automation initiative provides customers with a sense of security and trust.

4. Core Banking Optimization
   BNI has successfully increased the capacity and capability of its Core Banking system through various optimization initiatives. The results of these efforts are significant, with a 242% acceleration in the End of Day (EOD) process, a 233% acceleration in the End of Month (EOM)

process, and a 500% acceleration in repost transaction processes. This improvement not only strengthens operational efficiency but also ensures faster and more accurate services for customers.

5. Sustained Endpoint Security
   BNI continuously maintains and enhances security for endpoints, which are devices connected to the computer network on both the server and client sides that serve as endpoints in data exchange, including protection from external threats. This is carried out to ensure the reliability of BNI's IT system security while also protecting sensitive data from cybersecurity threats.

6. IT Competency Model
   As a measure of human resource quality, BNI's IT Work Unit (SKTI) implements a standardized framework to manage and develop employee competencies in the IT field, including skills, performance management, community, and career paths. The utilization of the IT Competency Model enables employees to enhance their expertise in line with their daily activities to support the company's objectives.

REALIZATION OF IT IMPLEMENTATION PROGRAM

BNI's IT plays an active role in fulfilling IT solution support to address business development needs through IT implementation programs, particularly in the context of supporting BNI's business achievements and transformation. In 2024, we have undertaken several initiatives to support the bank's business strategy and BNI's growth. The following are some of BNI's IT implementation programs, along with their achievement percentages and evaluations:

Banking Services Development in the Retail Area

This development focuses on providing an optimal user experience, increasing service adoption, and supporting business growth. One of the standout IT developments in 2024 is wondr by BNI.

wondr by BNI is a new banking app from BNI equipped with the latest technology and global standards, featuring a more modern and fresh interface and providing a better user experience. Emphasizing Hyper-Personalization by utilizing data and analytics to offer more personalized services tailored to the needs of each customer, wondr by BNI is equipped with 3 Financial Dimensions: Transactions, Insights, and Growth as key features to provide the best banking experience in transactions and future planning.

The increasing demand for transactions among the public makes the Transaction feature wondr by BNI aimed at supporting customers' fast, secure, and convenient financial needs in real-time. Features such as domestic transfers, international transfers, e-wallet top-ups, TapCash top-ups, QRIS payments, bill payments, and scheduled transfer arrangements can all be done in just three simple steps to help customers manage their daily transactions. Each process in the Transaction feature of wondr by BNI prioritizes an intuitive and self-explanatory flow design based on in-depth research to provide a much more enjoyable user experience.

In line with the increasing financial literacy of the Indonesian public, wondr by BNI presents the Insights feature to assist BNI customers in checking their financial health. Customer transactions conducted across all BNI channels, whether through ATMs, EDCs, or digital channels, will immediately appear and be categorized according to modern societal needs such as Food & Beverages, E-wallet Top Up, Monthly Bills, Transportation, Shopping, Lifestyle, and others. This feature will also provide an easily understandable diagram comparing the customer's income and expenses over a month. It is hoped that this will help the Indonesian public to be more prudent in managing their finances.

Future planning has become a common practice among the Indonesian public today. In addition to providing a transaction experience and robust spending behavior insights, wondr by BNI is also equipped with the Growth feature, which focuses on future planning by providing various hyper-personalized financial product options according to the needs and risk profiles of customers, such as time deposits, savings, and investment instruments, to encourage customers to grow and develop financially according to their future dreams. wondr by BNI also provides users access to view all their assets within the BNI ecosystem and its subsidiaries, such as Savings and Current Accounts, Time Deposits, and Investments (Mutual Funds, Bonds, Stocks, DPLK, and Bancassurance) on a single screen.



The development of the wondr by BNI application has reached its first release with its launch on July 5, 2024. Furthermore, until the end of 2024, wondr by BNI is in a coexistence phase with BNI Mobile Banking, where the migration of existing features is underway, with completion expected in the coming months. Once the migration of these features is fully completed, wondr by BNI will replace BNI Mobile Banking as the personal digital channel for BNI customers.

wondr by BNI has been downloaded more than **6.1 million** times throughout 2024 since its launch and shows an active transaction user rate of approximately 65%, which has consistently increased compared to BNI Mobile Banking. This demonstrates BNI's commitment to continue being the main transaction platform of choice for customers.

Banking Services Development in the Wholesale Area

This development focuses on creating a digital ecosystem that supports efficiency, personalization, and automation of services for corporate customers. The establishment of this ecosystem is realized with the launch of the flagship wholesale platform in the form of BNIdirect.

BNIdirect is a tangible manifestation of BNI's commitment to accelerating digital transformation in the wholesale banking sector. By providing cutting-edge features, reliable security systems, and an innovative approach focused on user needs, this platform is designed to meet the ever-evolving business requirements. As a leading solution, BNIdirect offers a **one-stop solution** for various financial needs of customers.

BNI ensures that BNIdirect has a **user-friendly interface** designed for ease of navigation and provides 24/7 real-time accessibility through various platforms, both via the web **(https://direct.bni.co.id/)** and mobile applications. Additionally, this platform supports multilingual features (Indonesian, English, and Mandarin), providing flexibility for customers from diverse backgrounds. To enhance convenience, BNI provides a dedicated team ready to assist customers from the pre-transaction phase to the post-transaction phase, ensuring an optimal service experience at every step of using this platform.

Security remains a top priority. BNIdirect offers flexible user access management features and is equipped with authorization systems through hard tokens (BNI e-Secure) or soft tokens (mobile tokens). With this feature, customers have full control over every transaction made, ensuring maximum protection at every stage of operations.



As of October 2024, BNIdirect, with its new capabilities, has been officially introduced to the public. Now, BNIdirect offers seamless access to a wide range of wholesale products, including Cash Management, Supply Chain, Trade and more, with enhanced features that further simplify transactions for customers.

The number of BNIdirect users has reached 173 thousand customers as of December 2024, an increase of 14.2% from the same position in the previous year. From this number, the transaction volume generated by BNIdirect reached IDR7,931 trillion, an increase of 23.3% from the previous year.

Internal Bank Capabilities Enhancement as Enterprise Support

This fulfillment focuses on strengthening operational efficiency, improving service quality, and supporting a comprehensive digital transformation strategy. Several solutions launched to support Enterprise Support include an Operational Data Store, Master Data Management, and BNI Anti Money Laundering System.

Operational Data Store

The implementation of the Operational Data Store (ODS) allows historical transaction data to be obtained and recorded in near real-time to support faster information requests, analytics, and reporting needs.

Master Data Management

BNI implements Master Data Management (MDM) as a primary data management system that ensures consistency, accuracy, and integrity of data across the bank's systems and processes. MDM integrates, centralizes, and manages critical data, such as customer data, products, accounts, and transactions, resulting in a reliable Single View of customers.

BNI Anti Money Laundering (AML) System

The development of the BNI AML System is designed to prevent and detect money laundering and terrorist financing. BNI implements a comprehensive AML program to ensure compliance with regulations, particularly POJK No. 8 of 2023, and to maintain the integrity of the financial system. With enhancements to the BNI AML System, BNI avoids the risk of exposure to fines of approximately IDR126.4 billion in 2024.

IT System and Infrastructure Hygiene Capabilities Enhancement

The enhancement of IT System and Infrastructure Hygiene Capabilities aims to ensure that the technology information systems and infrastructure remain reliable, secure, and aligned with evolving business needs.

Core Banking Optimization

BNI has successfully increased the capacity and capability of its Core Banking system through various optimization initiatives. The results of these efforts are significant, with a 242% acceleration in the End of Day (EOD) process, a 233% acceleration in the End of Month (EOM) process, and a 500% acceleration in repost transaction processes. This improvement not only strengthens operational efficiency but also ensures faster and more accurate services for customers.

Configuration Management Database

Enhancements in incident and problem management are made to serve as a reference for impact analysis of occurring problems.

REALIZATION OF SHAREHOLDER ASPIRATIONS PROGRAM IN 2024

BNI supports and accommodates Shareholder Aspirations (APS) to grow BNI through various IT programs in 2024 as follows:

1. **Strategic Information Technology Plan (RSTI)**
   As a form of BNI's commitment to align its IT strategy with the needs and direction of the Bank's business, the RSTI has been updated in 2024 to align with BNI's Corporate Plan for the period 2024-2028. The updating of the RSTI is carried out to ensure that IT implementation continues to follow the Board of Directors' policies, business strategies, and the execution of BNI's transformation while considering IT trends and regulations in the banking sector both locally and globally.

   This RSTI serves as a roadmap for BNI's digital transformation, with the primary goal of optimizing the use of technology to support operations, enhance efficiency, and drive innovation. The preparation of the RSTI is based on BNI's vision and mission, which is in line with the Regulation of the Minister of SOEs No. PER-02/MBU/02/2018 regarding Principles of Information Technology Governance and the Decree of the Minister of SOEs No. K-145/MBU/05/2021 regarding the Master Plan for Information Technology of the Ministry of State-Owned Enterprises for 2021-2024.

As of December 2024, BNI has achieved a progress rate of 92.04% of the strategic IT projects set for implementation in 2024. This achievement reflects the commitment of IT to continue supporting BNI's ongoing efforts to integrate IT strategy into the company's business strategy.

2. **Evaluation of the Effectiveness of Information Technology (IT) Implementation**
   In relation to the evaluation of IT implementation, the Ministry of SOEs has established an international standard IT governance framework and set implementation priorities as guidelines for evaluating governance, performance, and the utilization of technology in each SOE. The framework for assessing IT implementation uses the Control Objectives for Information and Related Technologies (COBIT) 2019 with a two-dimensional process capability model based on process category (domain) and capability level categories.

   BNI's IT Maturity has been successfully maintained at a capability level of 4 (predictable) through periodic evaluations, continuous improvement efforts, management commitment to support these enhancement initiatives, employee training and competency development, increased awareness and ownership of IT governance, as well as performance monitoring against relevant KPIs. This demonstrates that BNI's IT processes and governance are in line with best practices. This is supported by efforts to enhance IT Maturity through fulfilling gaps in assessment results, including meeting obligations to regulators and shareholders.

3. **Follow-Up on INDI 4.0 Assessment Results**
   In order to fulfill the implementation of the Indonesia Industry 4.0 Readiness Index (INDI 4.0) assessment for SOEs as outlined in the MoU between KBUMN and the Ministry of Industry No. MoU-03/MBU/04/2021 No. 1 of 2021, BNI has conducted a self-assessment of INDI 4.0 and reported the results to the Ministry of SOEs as of December 30, 2024, with a level 4 result (level: already implemented). The monitoring of INDI 4.0 achievement can be fulfilled through periodic evaluations and adaptations to changes in the business environment, continuous investment in technology, and human resource development, including the establishment of a culture of innovation and creativity, as well as implementing strong governance. The success in maintaining the INDI 4.0 level demonstrates BNI's readiness as a bank that complies with industry standards.

4. **BUMN Digital Talent Program**
   To support the BUMN Digital Talent Program, since 2022, the Bank has been developing the capabilities of IT & Digital employees, which include IT & Digital Bootcamp, IT Capability Training, Digital Capability Training, IT Security Training, Data Management Training, and Certification. Learning is conducted through classical training, online training, knowledge supplement webinars, daily exercise employee programs, and learning modules on BNI Smarter.

   The realization of the Digital Talent development program implementation until Q4 2024 is 94.18% or 27,305 employees out of a total of 28,991 BNI Group employees. The implementation of digital talent development is carried out through the execution of a learning plan for developing digital talent capabilities based on a learning roadmap that has been prepared according to the development needs analysis.

5. **Cybersecurity Profiling and Ensuring Readiness of Human Resources, Processes, and Technology Infrastructure Supporting Cybersecurity**
   BNI has conducted cybersecurity profiling to understand risks and ensure the readiness of human resources, processes, and technology infrastructure while considering the principles of Confidentiality, Integrity, and Availability (CIA) as well as applicable laws and regulations.

   Regarding human resource readiness, BNI has provided training and awareness on information security to all employees through the Learning Mandatory-Security Awareness program, with participation reaching 25,132 out of a total of 26,176 employees (96%) by the end of December 2024. Meanwhile, the Bank has also implemented and updated policy and procedure documents to detect and respond to incidents. As of December 2024, a total of 50 procedure/standard documents have been reviewed, and 5 new procedure/standard documents have been implemented. Updates to technology infrastructure, including security devices, are continuously being carried out.

IT Solution Development Based on IT Application Architecture

BNI has developed a Strategic Information Technology Plan (RSTI) to optimize and align business objectives with IT strategy. This step facilitates the bank in creating effective and efficient IT solutions, thereby optimizing IT development costs. One component of the RSTI is the Enterprise Architecture based on the TOGAF Framework, which is established as a development standard, encompassing Business Architecture, Application Architecture, Technology Architecture, Data Architecture, and Security Architecture.

BNI's Enterprise Architecture has become the standard in the development of IT systems and applications, both for Digital Bank products and Open Banking. The alignment among components of the Enterprise Architecture supports BNI in providing innovative solutions for business process enhancement, thus facilitating the integration of BNI's solutions with stakeholders.

The Enterprise Architecture Landscape has adopted the Banking Industry Architecture Network (BIAN) and is categorized as follows:

1. **Channels**
   This includes all interaction channels connecting the bank with its customers. It consists of 3 (three) focus capabilities:
   a. Bank (Assisted) Channels (Subdomain): Facilitates direct interaction with officers.
   b. Customer Channels (Subdomain): Supports self-service for customers.
   c. Open Banking.
2. **Customer Relationship Management**
   Manages customer relationships comprehensively, from Customer, Marketing and Sales, to Service.
3. **Products & Services**
   Covers the bank's portfolio of products and services. It consists of 6 (six) focus capabilities:
   a. Credit Card: Credit card purchase services, including additional benefits such as reward points and cashback.
   b. Treasury: Management of liquidity, investments, and financial risks of the bank.
   c. Trade Finance: Support for trade processes, such as letters of credit and bank guarantees.
   d. Loan, Payment: Loan services and various payment methods.
   e. Card Management: Management of the lifecycle of banking cards.
   f. Core Banking: The main core system that manages the bank's daily operations.
4. **Operational Services**
   Ensures that the bank's operations run smoothly, securely, and compliantly. It consists of 5 (five) focus capabilities:
   a. Remittance: Money transfer services between banks, both domestic and international.
   b. Statements: Provision of periodic account transaction reports for customers.
   c. Merchant: Payment management services for merchants, including credit card, debit card, and other payment processing.
   d. Clearing & Settlement: The process of settling transactions between banks to ensure funds are transferred correctly.
   e. Loan Operation: Management and administration of loans, from application to repayment.
5. **Enterprise Support**
   Provides support for all functions at the enterprise level. It consists of 4 (four) focus capabilities:
   a. Finance & Accounting: Management of the bank's finances and accounting, including financial reporting, budget control, and audits.
   b. Human Resources Management: Management of human resources, including recruitment, training, development, and employee performance management.
   c. Content & Document Management: A system for managing content and documents to store, organize, and access information efficiently.
   d. Team Collaboration: Tools and platforms that support team collaboration, such as communication, document sharing, and project management.
6. **Integration**
   Ensures interoperability between systems, including API Management, Messaging, and Data Integration. It consists of 3 (three) focus capabilities:
   a. API Management: Management of Application Programming Interfaces (APIs) to enable secure and efficient communication and data exchange between applications.
   b. Enterprise Service Bus: Middleware infrastructure that integrates various applications and services within the organization to enable smooth communication and data exchange.
   c. Transaction Switch: A system that processes and routes financial transactions among various payment systems and networks.
7. **Risk & Compliance**
   Manages risks and ensures compliance, covering Operational Risk Management, Market Risk Management, Credit Risk Management, and Financial Crime Compliance. It consists of 6 (six) focus capabilities:

a. Credit Risk: Management of risks related to the possibility of default by borrowers or other parties indebted to the bank.
b. Enterprise Risk: Comprehensive risk management across BNI, covering various types of risks that may affect the bank's strategy.
c. Operational Risk: Management of risks arising from failures in internal processes, people, systems, or external factors that may disrupt the bank's operations.
d. Asset & Liabilities Management: Management of the bank's assets and liabilities to ensure a balance between risk and return, as well as maintaining liquidity and profitability.
e. Regulatory: Compliance with applicable regulations and laws in the banking sector to ensure the bank's operations are in accordance with legal and industry standards.
f. Anti-Money Laundering: Programs to prevent and detect money laundering and terrorist financing, including customer identity verification and monitoring of suspicious transactions.

8. **Enterprise Information System**
   Managing the company's data and information, which includes Big Data, Data Science, Business Intelligence, and Data Governance. It consists of 2 (two) focus capabilities, namely:
   a. Business Intelligence & Analytics: The collection, analysis, and presentation of business data to support better decision-making.
   b. Information Governance: A framework and policies for effectively and securely managing information, encompassing data management, compliance with regulations, and protection of sensitive information, as well as ensuring data integrity and security.

Information Technology Infrastructure

Bank Negara Indonesia (BNI) is supported by 3 Data Centers (DC) and certified by the Uptime Institute to support the best digital services for all customers. As part of the commitment to provide reliable services, BNI consistently ensures service availability through testing the Disaster Recovery Plan (DRP) by continuing to increase Switch Over & Switch Back (SO-SB) activities, to test the backup system in running services, especially for critical and transactional applications. With a minimum uptime of 99.90% in 2024, an optimal, sustainable service was provided, to increase the level of service availability and to provide a sense of security and comfort for customers in using various BNI digital services.

BNI also ensures digital services reliability for customers, by increasing capacity (capacity planning), and digital system capabilities by applying the appropriate latest technology for BNI's business. For continuous infrastructure rejuvenation, and in line with the Software-Defined-Everything paradigm to simplify the IT infrastructure governance and operations, BNI has implemented a Software-Defined Data Center using Cloud and Virtualization, Software-Defined Storage based on Hyperconverged technology, as well as Software-Defined Network and Software-defined Wide Area Network.

BNI has implemented the CMDB (Configuration Management Database) tool, which is an important aspect in implementing IT Service Management to improve reliable IT services for BNI businesses. In addition, BNI has Real Time Monitoring Tools that are not only used for monitoring but also for predictive capacity planning and automated task operations through the use of Artificial Intelligence (AI). Together with the Helpdesk and IT Service Management, BNI ensures excellent service monitoring and remediation 24 x 7.

With these efforts, BNI is committed to continuously maintaining the reliability and availability of excellent digital services, ensuring that customers feel safe and comfortable in utilizing the various digital banking products and services provided.

Use of Performance Monitoring and Management Platform at BNI

BNI has implemented an artificial intelligence (AI)-based application performance monitoring and management platform to analyze and optimize application performance, infrastructure, and user experience. This platform plays an important role in helping BNI's DevOps, Developer, and IT teams detect performance issues quickly and ensure the system runs efficiently.

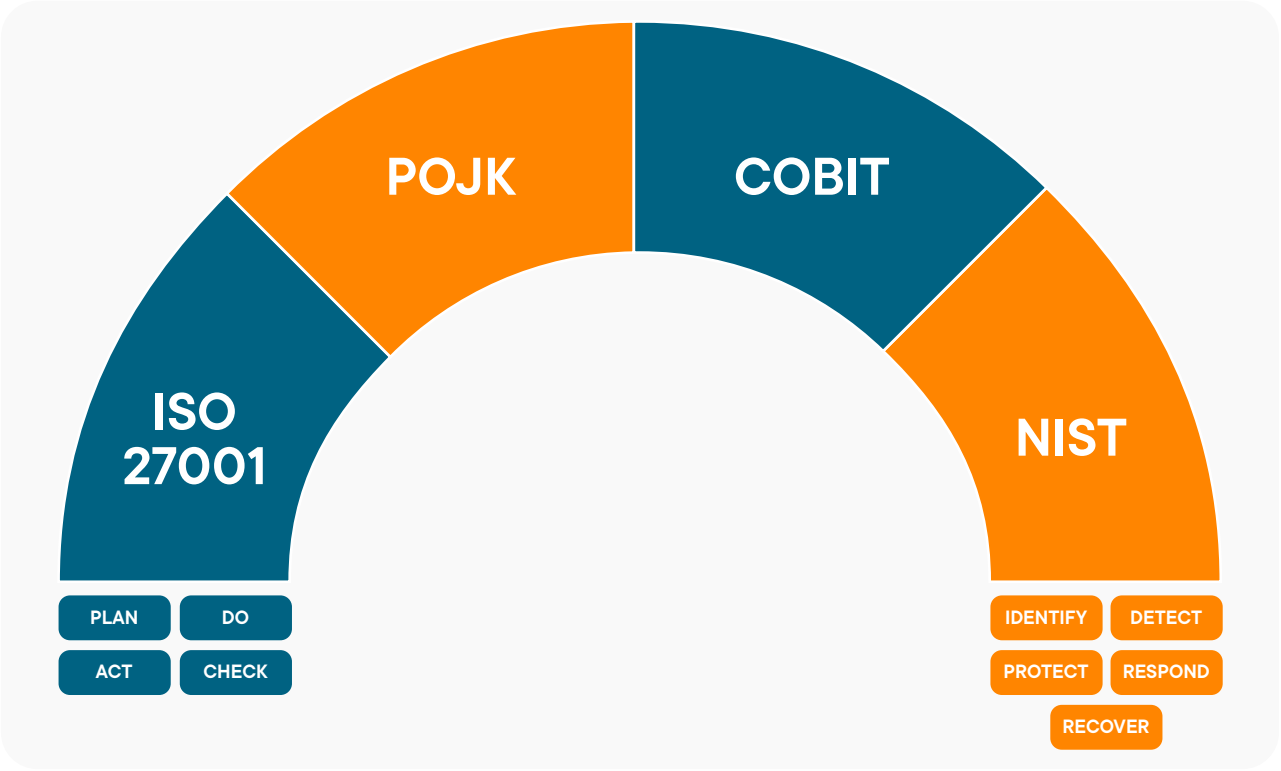
The main features used at BNI include:

1. Full Stack Monitoring: Comprehensive monitoring from the front-end to the back-end of the application, including servers, databases, and networks.

2. Real User Monitoring: Monitoring real user activity to understand the user experience directly.
3. Synthetic Monitoring: Automatic application testing with user simulations to detect problems before real users experience them.
4. Infrastructure Monitoring: Monitoring IT infrastructure such as servers, networks, and hardware to ensure optimal performance.
5. Distributed Tracing: Tracking request flows through various services and application components to identify the source of performance problems.
6. AI-Powered Root Cause Analysis: Analysis of the cause of performance problems using artificial intelligence to quickly find the root cause.
7. Auto Discovery & Auto Instrumentation: Automatic detection and application of monitoring tools on application components without manual intervention.
8. Cloud-Native Monitoring: Monitoring of applications running in the cloud environment to ensure performance and scalability.

BNI applications monitored with this platform include various digital banking services and internal systems, all of which contribute to improving operational efficiency and service quality to customers.

Information Security Controls



To support BNI's commitment to protecting customer data and maintaining safe IT operations, it continues to strengthen cyber security through a variety of efforts, including:

1. Strengthening the information security function by developing the CISO (Chief Information Security Officer) function in an effort to focus on BNI cyber security;
2. Continuously implementing governance, regulations and compliance so that information security runs well, and in accordance with internal regulations, statutory provisions and applicable best practices;
3. Continuously implementing a security architecture for information security for assets, data, applications, endpoints, networks and security parameters to ensure the principles of confidentiality, integrity and availability run well;

4. Collaborating with official state bodies (BI, OJK and BSSN), security device principals and other cybersecurity activist communities to obtain information on threats and weaknesses, the latest technology and products, as well as support when incidents occur;
5. At the end of 2024, BNI carried out an Information Security Audit within BNI conducted by BNI Internal Audit (IAD) and was certified with ISO 27001:2013 - The Information Security Management System in The Provision of Open API Services with the results of the criteria "Certified".

BNI has commitment to continuously develop cybersecurity to safegured innovations in banking services for more properly maintained customer trust and comfort. This effort is made in consistency in line with the direction of business development towards digital banking. BNI has also made other efforts to ensure business sustainability are kept from cybercrime threats under the following domains:

1. Identify
   a. Continuously implementing governance, regulations and compliance so that information security runs well, and is in accordance with internal regulations, statutory provisions and applicable best practices;
   b. Developing security aspects in every application development by applying the Secure SDLC framework so that security is involved in all phases of demand and delivery. In addition, security plays an active role in security testing, both after the project is completed, and periodically in testing and production environments;

2. Protect
   a. Continuously implementing security architecture for information security for assets, data, applications, endpoints, networks and perimeter security to ensure the principles of confidentiality, integrity and availability run well;
   b. Implementing multilayer of defense security devices that refer to international standards as implemented in national banking;
   c. Educating employees to increase awareness of cyber security and on a regular basis carry out phishing simulations for employees;
   d. Continuously organizing awareness education through Human Capital competency development programs; and
   e. Periodically carrying out security testing on BNI applications to strengthen BNI applications from cyber attacks.

3. Detect
   a. Implementing security solutions using machine learning and artificial intelligence security systems;
   b. Implementing security solutions for end point security with improvements in control, data privacy and cyber attack protection;
   c. Conducting 24x7 proactive monitoring of cyber threats; and
   d. Continuously reviewing the current security controls and updating them;

4. Respond
   a. Instigating customer protection mechanisms against fraudulent transactions caused by banking malware or social engineering;
   b. Carrying out Threat Hunting using detection mechanisms and taking down fake websites carrying BNI's name;

5. Recover
   a. Collaborating with official state bodies (BI, OJK and BSSN), security device principals and other cybersecurity activist communities to obtain information on threats and weaknesses, the latest technology and products, as well as support when incidents occur;

Strengthening the 5 domains above is BNI's effort to increase cyber maturity by focusing on the Cyber Security Framework (CSF). Efforts to increase cyber maturity are carried out on aspects of people, processes, and BNI technology using a holistic approach. From the people's side, increasing cyber security awareness is a crucial step. In addition, advanced training programs for IT Security and incident response teams must be strengthened so that they have the ability to identify, analyze, and respond to attacks quickly. Strengthening the culture of cyber security throughout the organization, from the executive level to operational staff, will help reduce risks caused by human factors. In addition, BNI is in the process of increasing cyber resources with professional cyber talent acquisition and training programs to improve the skills of the cyber resources it has. In this process, cyber talent supporting BNI has increased 3-fold in the 2022-2024 period.

From the process side, BNI continuously develops mature policies and procedures that are in line with the Cyber Security Framework (CSF). This includes creating or updating all procedures that support cyber security and protection. Implementation of periodic cybersecurity audit processes has been carried out to identify gaps and ensure compliance with security standards. Currently, BNI has a cybersecurity governance team tasked with monitoring the implementation of policies and ensuring effective coordination between divisions in responding to cyber threats.

From a technological perspective, investment in the latest security technology is very important to anticipate cyber threats that are always evolving in line with technological developments. BNI has implemented next-generation firewall solutions and intrusion prevention systems (IPS), supported by a Security Operation Center team that works 24 x 7 to improve threat detection and response in an integrated manner. Endpoint detection and response (EDR) technology is also crucial in monitoring endpoint activity. In addition, the implementation of end-to-end data encryption, identity management, integration of security information and event management (SIEM) systems will ensure strong and proactive security. By combining elements of people, processes, and technology, BNI Bank can achieve higher cyber maturity sustainably and adaptively to evolving threats.

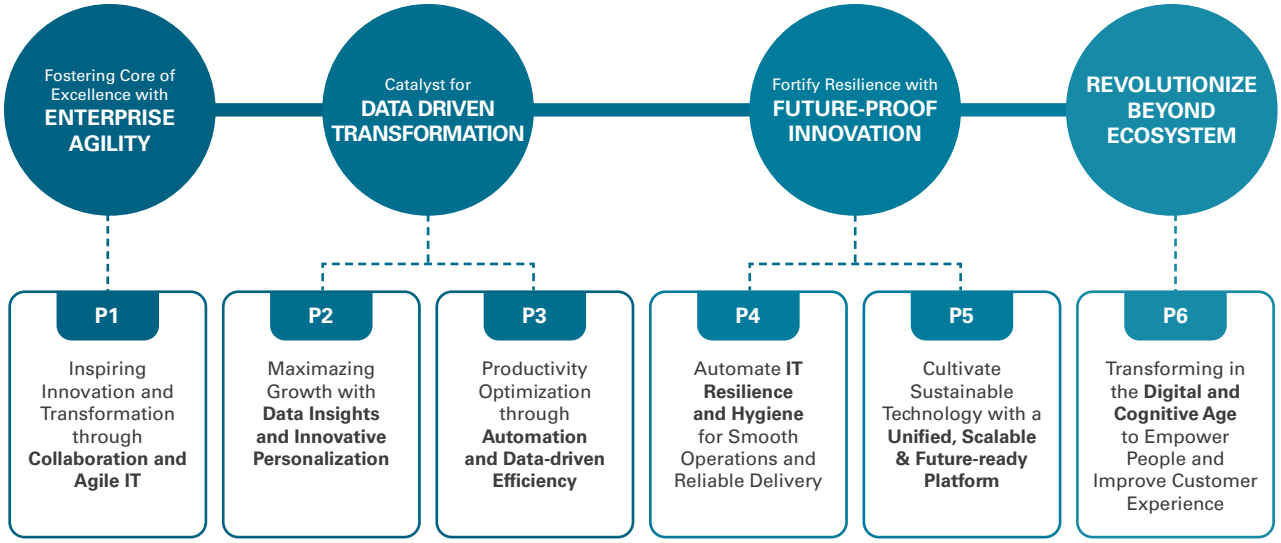
BNI pays more attention to the trend of cyber attacks that are currently spreading to customers and implements several safeguards on the customer side, including:

1. Multi-factor authentication and face recognition (liveness detection) mechanisms to improve security and reduce the risk of misuse of customer identities.
2. Continuous education is carried out to customers about self-protection through password security, internet banking security, mobile banking security, ATM transaction security, and others.

BNI IT Strategic Plan

Throughout the fiscal year, BNI's IT program has proven to be able to consistently support business growth through expanded market access and operational efficiency. Efforts to improve digital technology capabilities are expected to bring BNI into a bank that is able to compete in the digital era and inspire the banking services industry in the future.

As a guideline for implementing IT support to achieve business objectives and support BNI's current Corporate Plan, an IT Strategic Plan (RSTI) 2024-2028 has been prepared. The RSTI initiative plan is 4 missions derived from the IT Vision and further elaborated into six main IT programs.



Here is how the six main IT programs is described:

1. **Inspiring Innovation and Transformation through Collaboration and Agile IT**
   This program emphasizes the importance of collaboration and the application of Agile methodology in the IT organization to drive innovation and continuous transformation at BNI.
2. **Maximizing Growth with Data Insights and Innovative Personalization**
   This program seeks to maximize data utilization to drive business growth through a deep understanding of customers and the provision of personalized services.
3. **Productivity Optimization through Automation and Data-driven Efficiency**
   This program seeks to increase the productivity and efficiency of bank operations through automation of business processes and optimal utilization of data.
4. **Automate IT Resilience and Hygiene for Smooth Operations and Reliable Delivery**
   This program highlights the importance of automation in maintaining the resilience and security of IT systems at BNI. With automation, BNI can ensure smooth operations, uninterrupted service delivery, and minimize cybersecurity risks.
5. **Cultivate Sustainable Technology with a Unified, Scalable & Future-ready Platform**
   This program highlights the importance of building a solid, flexible, and future-ready technology foundation. This means creating an integrated platform that can grow with the growth of the bank's business while ensuring the sustainability of technology in the long term.
6. **Transforming in the Digital and Cognitive Age to Empower People and Improve Customer Experience**
   This program underlines the importance of banks adapting to rapid changes in the digital era and utilizing cognitive technology to provide better services to customers. The core of this program is a deep digital transformation, where technology is not only a tool but also a key driver in providing added value to customers and society.

This RSTI will continue to be reviewed and updated in accordance with updates to the Corporate Plan, Board of Directors' Policy, business strategy, and BNI's transformation strategy. This review also considers information technology trends and regulations in the banking sector, both locally and globally. This step is a form of BNI IT's commitment to always align strategy with the needs and direction of the Bank's business.



Information Technology Governance [ACGS (B).D.5.1]

In IT development, BNI works to build its resilience to all exposures to risks, both within and outside the organization. This involves enhancing the ability to deal with disruptions, regulatory changes and cyber attacks, and other business uncertainties. In practice, the Bank has paired the above efforts with technological innovations that are relevant to today's needs and able to survive with further development far into the future. [ACGS (B).D.5.1]

BNI continues to strengthen cyber security by implementing various initiatives to manifest its commitment to protecting customer data and maintaining the sustainability of IT operations to remain secure. Some of the efforts BNI has made in this cyber security domain involve strengthening the information security function through the development of the CISO (Chief Information Security Officer) function and applying governance, regulation, and compliance to ensure information security runs effectively. BNI also implements an effective information security architecture involving the protection of assets, data, applications, endpoints, networks, and security parameters by adopting a defense-in-depth approach to ensure the practical application of the principles of confidentiality, integrity, and availability.

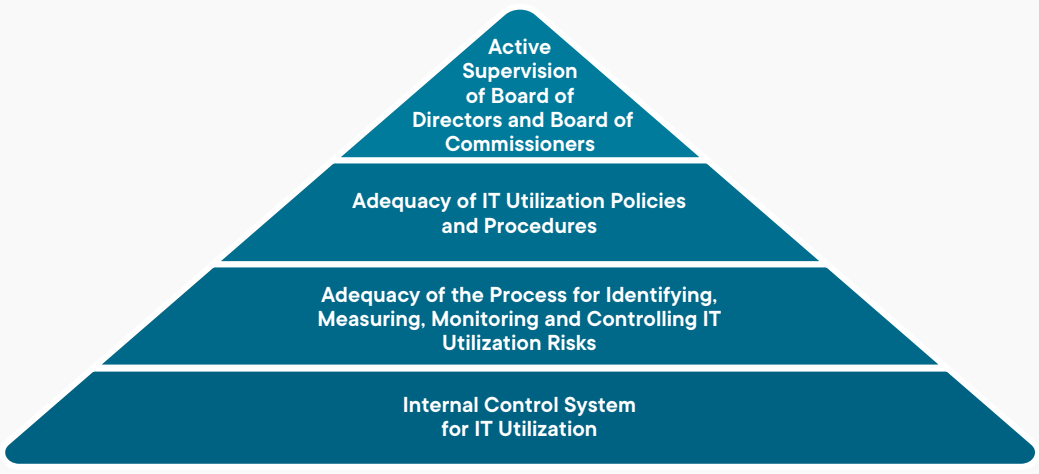
To ensure the continuity of information technology (IT) operations, including in the event of a disaster or mass disruption, BNI has implemented a disaster recovery backup system. This measure involves storing data in a separate structure that functions as a Disaster Recovery Center (DRC) and implementing a redundancy configuration that functions as High Availability (HA) to optimally and continuously run IT Services.

IT governance is designed to ensure that all significant risks are identified, managed, and reported to the Board of Directors.

INFORMATION TECHNOLOGY IN BNI BUSINESS ACHIEVEMENT AND TRANSFORMATION

Information Technology (IT) Governance is a framework and process BNI has adopted to ensure its IT aligns with strategic objectives in the pursuit of optimal business value. The objective of Information Technology Governance is to manage risks in the Information Technology (IT) sector, increase effectiveness and efficiency, and ensure compliance with applicable IT regulations.

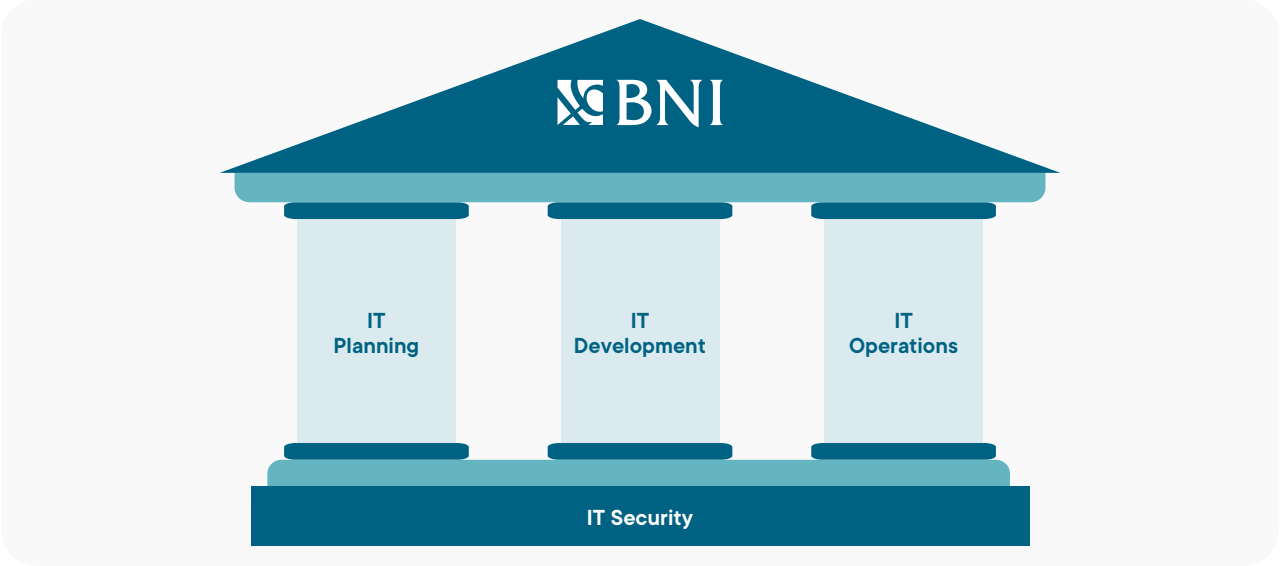
BNI implements IT Governance through the alignment of IT Strategic Plan with business strategy, resource optimization, IT utilization, performance measurement, and effective risk management with due compliance with the provisions of the Financial Services Authority and Bank Indonesia regulations. The implementation of IT Governance at BNI includes the following:



The use of IT at BNI is regulated in policies, standards and procedures that are applied consistently and continuously in accordance with the provisions in OJK Regulation No. 11/POJK.03/2022 concerning Implementation of Information Technology by Commercial Banks.



Currently, BNI IT Governance is broadly divided into 4 (four) scopes: Planning, Development, Operations, and IT Security.



INFORMATION TECHNOLOGY PLANNING

IT planning includes several processes and activities, including:

1. Preparing an IT Strategic Plan to describe the roadmap, BNI's technology strategy, the Information Technology Work Unit vision and mission, the main principles that serve as a reference in the development and use of Information Technology to meet current and future business needs, in line with the BNI long term strategic plan.

The IT Strategic Plan consists of several parts, namely:
a. IT Business Alignment
b. IT Enterprise Architecture & IT Resource Capability
c. IT Roadmap
d. IT Investment Plan

2. Annual IT Plan including:
a. IT Application Development Plan
b. IT Infrastructure Development Plan
c. IT HC Education and Training Plan
d. IT Governance Improvement Plan
e. Investment Cost and Operational Cost Budget
f. IT Work Unit's performance indicators relating to risk levels, and the scale of IT project priorities, linked to the Bank's business and IT Strategic Plans.

INFORMATION TECHNOLOGY DEVELOPMENT

IT governance covers the end-to-end IT development process of implementing the Software Development Life Cycle (SDLC), both waterfall and agile. In 2024, BNI developed a New SDLC procedure with flow development in the demand and delivery phases. The demand phase starts with the process of registering IT development initiatives, defining requirements, implementation approach selection, prioritization to the formation of a project charter. The delivery phase starts with project kick off, detailing requirements & design, development, testing, deployment preparation, release control board, migration, Production Trial Run (PTR), golive, up to project closure.

In the demand phase, there is enrichment of activities or planning processes to ensure the quality of projects to be implemented that provide benefits for the Bank, including:
1. Preparing a Feasibility Study (FS), a process of explaining project implementation objectives, brief project scope, budget requirements, and the benefits to be obtained by the Bank. FS is used as a benchmark for feasibility testing of IT project proposals (cost & benefit analysis).
2. Prioritizing IT project proposals, a process of reviewing and analyzing the IT project proposals feasibility referring to the FS, to ensure that the proposed project that are prioritized can provide the best benefits (business value) for the Bank.

During the delivery phase, there will be an enrichment of activities or implementation processes to ensure that the quality of delivery or development results is optimal and in line with user needs, by having an Architecture Review Forum (ARF) and Release Control Board (RCB) activities.
1. The Architecture Review Framework (ARF) is an activity for further review and evaluation of the proposed architecture in IT projects aimed at ensuring alignment with the architecture standards and strategies at BNI. The ARF involves evaluating the architectural design, identifying potential risks and issues that may arise, ensuring compliance with established standards and guidelines, while also fostering potential innovations within it. With the ARF, BNI can ensure that each IT project proceeds as planned, reduce the likelihood of work duplication, and enhance the quality and speed of IT project completion.
2. The Release Control Board (RCB) aims to conduct reviews and verifications of promotion readiness both administratively and technically, including the completeness of documents, permits, and infrastructure readiness, to subsequently provide approval for the promotional plans of each development that has been carried out. The RCB evaluates the release plans, coordinates with the involved teams to minimize negative impacts, and ensures compliance with standards and regulations. With the RCB in place, BNI can ensure that each release can be conducted safely, efficiently, and in alignment with business objectives.

In addition, for the establishment of service standards and supporting infrastructure, we have implemented Application Criticality assessment. Through the application criticality assessment, priorities, resource allocation, and necessary risk mitigation strategies for an application will be determined.

INFORMATION TECHNOLOGY OPERATIONS

IT operations includes processes and activities, including data center operational management, communication systems and networks management, system incidents/problems management, operational management of IT systems by third parties, and IT operations risk management.

INFORMATION TECHNOLOGY SECURITY

BNI's IT security governance focuses on a cyber security framework divided into 3 (three) pillars, namely:
1. Governance: includes security awareness, information security provisions and development of team and organizational capabilities;

2. Protection: consists of a multi-layer defense mechanism, security assessment (penetration testing and vulnerability Assessment), as well as incident management and forensics;
3. Operation: includes 24x7 Security Operation Center (SOC), threat intelligence, network and endpoint security, as well as user access management BNI maintains a balance between People, Process and Technology aspects when selecting a framework. Based on these considerations, BNI's IT governance implementation adopts the frameworks that are appropriate to the IT service areas at BNI.

Control Objectives for Information and Related Technologies (COBIT)

Control Objectives for Information and Related Technologies (COBIT) is widely recognized as an IT management and IT governance framework. COBIT regulates IT management to meet the needs of BNI stakeholders through managing process groups and enablers, where business goals are mapped to IT goals, and achievement and maturity are measured.

BNI's IT management uses the COBIT framework as a reference for its governance as there is synergy between business goals and IT goals, it is focused on data and information, it can be flexible to follow the Company's work direction, and it can be used in conjunction with other framework standards. Thus, COBIT assists BNI in ensuring that IT management is in line with business strategy and provides optimal added value.

Information Technology Information Library (ITIL)

Information Technology Information Library (ITIL) is standard framework for IT Service Management (ITSM), which BNI IT uses to align IT support services to BNI business. ITIL focuses on IT processes, procedures, tasks and service levels to support the Bank's strategy, provides added value, and maintains IT competency levels. With ITIL, BNI IT operations set a baseline as a service benchmark, as a basis for planning, implementing and measuring its achievements.

International Organization for Standardization 9001 (ISO 9001)

The IT of BNI has implemented ISO 9001 since 2007 with the scope of IT Operation and IT Security Management. ISO 9001 is a quality management system standard specifically designed to ensure that BNI can meet the different aspirations of its stakeholder but remain in full compliance with all prevailing regulations on all its products and activities.

BNI's IT development fulfilled the requirements to upgrade ISO 9001:2008 to ISO 9001:2015 after establishing mechanisms and quality standards that focus on Bank performance with a risk-based thinking approach so that the IT unit will be more proactive in preventing and reduce undesirable effects, and will always improve the system on an ongoing basis (continuous improvement) so as to maintain ISO 9001:2015 certification.

International Standard to Manage Information Security – ISO/IEC 27001

ISO 27001 is an international standard for Information Security Management Systems (ISMS). ISO 27001 is a widely chosen information security framework standard that is, has wide acceptance, is trusted by many organizations, and is a reference for other information security frameworks such as the NIST Cybersecurity Framework, SANS, etc. ISO 27001 standardization can be used to improve IT security and has a positive correlation to increase the level of trust of both customers, business partners/third parties and organizations.

To strengthen BNI in competing with its peers and the fintech industry, ISO 27001 standardization is important, and will reap the following benefits:

1. Make BNI more competitive in the banking, fintech and other financial institutions industry in providing a positive image and good perception in securing customers and business partners/third parties.
2. Improve information security governance in accordance with applicable national and/or international standards so that it will be relatively easier to obtain permits from regulators.
3. Make it easier for BNI to improve control of information security over digital banking business processes.

INFORMATION TECHNOLOGY STEERING COMMITTEE

BNI's Board of Directors established an information technology steering committee through Board of Directors' Decree No. KP/364/DIR/R dated August 13, 2021 concerning the Arrangement of the Technology Management Committee (TMC). The TMC was established to assist the Board of Commissioners and Board of Directors in carrying out supervision of Information Technology (IT) activities. Detailed information on the Technology Management Committee can be found in the Corporate Governance Chapter of this Annual Report. The TMC

membership structure has been updated through CDV Memo No. CDV/2/1209/R dated December 23, 2024 concerning Updating KMT Decree.

IT HC DEVELOPMENT AND CERTIFICATION PROGRAM

Increasing IT HC competency is very necessary to realize IT strategic plans, and for IT HC, BNI has designed and implemented a systematic and structured employee competency development plan. This helps improve the quality of IT strategic plans and create competitive advantage for BNI's business. The Bank realizes that program adjustments are needed so that the developments carried out remain in line with changes in the digital era.

BNI through the IT Work Unit equips IT HR with various training to develop soft skills and hard skills. Soft skill development is carried out through digital leadership training, technology presentation skills, and communication & negotiation skills. Meanwhile, equipping hard skill involves project management training, IT architecture, programming, CI/CD, secure coding, cloud security, and so on.

Throughout 2024, BNI sent IT HR to various education and training, including the following:

1. COBIT (Control Objective for Information and Related Technology) 2019 Certification
2. Professional Scrum Master (PSM) & Certification
3. Project Management Inbound Bootcamp
4. Data Analytic & Visualization
5. Business Intelligence
6. Professional Scrum Product Owner (PSPO)
7. Business Technology Requirement Architecture (BTRA)
8. Open shift essentials: Hybrid cloud, Multi cloud, GitOps
9. Google Analytics 4
10. Couchbase
11. Design Thinking
12. Microsoft Excel Dashboard & Report
13. Modern Application Development Training
14. Record of Processing Activities (ROPA)
15. Web Methods Integration Server
16. Agile Working and Scrum Methodology

BNI has also supported and facilitated IT HR to also take online training in various learning platforms such as Udemy, LinkedIn Learning, and other platforms.

IT SKILL-BASED ORGANIZATION

In response to future challenges, BNI's IT has implemented an IT Skill-based Organization that adheres to international industry standards to enhance the capabilities of IT human resources and fulfill formations in line with evolving business needs while creating IT personnel capable of becoming digital talents to support BNI's digital transformation. The implementation of the IT Skill-based Organization is continuously instilled as a culture within the IT Work Unit (SKTI) to ensure that the organization becomes increasingly agile and digitally oriented.

With the above efforts, the Information Technology Work Unit (SKTI) will have a competent pool of IT HR that aligns with industry needs. In addition, BNI also continues to improve IT HR engagement to keep it in line with the goals and vision of BNI IT mission.

IT AUDIT IMPLEMENTATION

As a form of BNI's commitment to applying good Technology Governance, BNI conducts regular audits. BNI organized an independent audit of the implementation of Information Technology by Internal Audit. The BNI's audits are carried out and guided by the Minister of SOEs Regulation No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of SOEs, especially article 210. For their implementation, the audits conducted by the Bank included an evaluation of the implementation of the IT Strategic Plan and an evaluation of the effectiveness of IT implementation

As well as being a form of BNI's compliance with regulatory and compliance aspects, the audit carried out by BNI is also to check BNI's level of readiness in managing Information Technology. In 2024, BNI followed up on 24 types of audits for various activities, including BI mandatory security audits, strategic project audits, IT procurement audits, and other audit activities.

SYNERGY IN THE APPLICATION OF INFORMATION TECHNOLOGY WITH SUBSIDIARIES

BNI's information technology development adopts an IT Agile and Lean Organization that can strengthen collaboration/synergy between BNI and subsidiaries with the aim of efficiency and optimization of IT resources, thereby increasing effectiveness and cost efficiency by providing added value to support service and business activities. Several potential digital synergies in order to support subsidiary company, including:

1. Synergy of Capabilities & Integration
   a. BNI Multifinance
      Carrying out synergy in Joint Financing and Collection Payment processes.

b. BNI Life
   Carrying out synergy in the process of making insurance policies and autodebit premium insurance payments.
c. hibank
   Carrying out synergy in the integration of ATM & EDC transactions through aggregators.
d. BNI Sekuritas
   Carrying out synergy in the integration of RDN transaction process and Investor Account Management.
e. BNI Ventures
f. BNI Asset Management

2. Technology Synergy
3. Sourcing Synergy
   Utilizing BNI's extensive infrastructure and network to support the expansion of subsidiaries in various regions.

IT AWARDS IN 2024

During 2024, various efforts made by BNI in the IT sector achieved good results as evidenced by the acquisition of awards in the IT sector as follows:

1. Indonesia Domestic Digital Transformation Bank of the Year at the Asian Banking & Finance Awards 2024 on July 4, 2024.
2. Indonesia Domestic SME Partnership Initiative of the Year at the Asian Banking & Finance Awards 2024 on July 4, 2024.
3. Winner in the Digital Transformation and Hybrid Cloud Infrastructure Category at the Red Hat APAC Innovation Awards 2024 (Organizer: Red Hat APAC) on August 29, 2024.
4. Best Mobile Banking Initiative – Indonesia (wondr by BNI) at the Global Retail Banking Innovation Award 2024 (Organizer: The Digital Banker) on September 5, 2024.
5. The 2nd Best - Mobile Banking at the Infobank 21st Banking Service Excellence Awards (BSEA) 2024 on July 2, 2024
6. The 2nd Best - SMS Banking di Infobank 21st Banking Service Excellence Awards (BSEA) 2024 on July 2, 2024
7. Platinum Trophy – 10 Consecutive Years in E-Banking (Organizer: Infobank 21st Banking Service Excellence Awards (BSEA) 2024 on July 2, 2024
8. Golden Trophy – 5 Consecutive Years in Digital Channel (Organizer: Infobank 21st Banking Service Excellence Awards (BSEA) 2024) on July 2, 2024
9. The Best Overall – E-Banking (Organizer: Infobank 21st Banking Service Excellence Awards (BSEA)) on July 2, 2024
10. The 2nd Best Overall – Digital Channel (Organizer: Infobank 21st Banking Service Excellence Awards (BSEA) 2024) on July 2, 2024
11. Infobank Banker of The Year – Toto Prasetio on November 29, 2024

INFORMATION TECHNOLOGY FUTURE DEVELOPMENT PLAN

Based on with the Minister of SOEs Regulation No. Per-2/MBU/03/2023 concerning Guidelines for Governance and Corporate Activities of SOEs, BNI is developing information technology and reliable and safe IT services by prioritizing the principle of benefit. IT service development is carried out based on best practices and refers to the IT Strategic Plan. The IT work unit defined four strategic missions in the IT Strategic Plan, namely Enterprise Agility, Data Driven Transformation, Future-Proof Innovation and Revolutionize Beyond Ecosystem.

In accordance with this, BNI will continue in the future to instigate improvements and upgrades to IT capabilities. In 2025, BNI will go deeper to improve security, with several other IT focuses, including:

1. **Ecosystem Value Chain Command Center**
   An initiative that connects all necessary information from various information sources for the relevant roles/divisions capable of displaying information, insights, and analyses for customers and the ecosystem in an integrated manner. This strategic initiative has the following core capabilities:
   a. Ecosystem value chain & deep tier analysis
   b. Transaction behavior analysis & alerts
   c. Integrated customer 360, insights and recommendations

   With these core capabilities, the Ecosystem Value Chain Command Center initiative can contribute to increasing branch productivity (revenue per branch) and enhancing RM productivity (monthly loan disbursement per RM).

2. **Integrated & Connected Experience**
   An initiative that integrates various channels to maintain consistency and a unified brand experience across all touchpoints. This strategic initiative has the following core capabilities:
   a. Integrated service strategy
   b. Contact center as engagement hub
   c. Orchestrated operations

   With these core capabilities, the Integrated & Connected Experience initiative can contribute to improving the Cost-to-Income Ratio (CIR).

3. **Intelligent Document Processing**
   An initiative to streamline workflows that are document-intensive and can automatically capture, analyze, and process information. This strategic initiative has the following core capabilities:
   a. Automated document classification
   b. Rapid data extraction
   c. Comprehensive document management

   With these core capabilities, the Intelligent Document Processing initiative can contribute to improving the Non-Performing Loan (NPL) ratio.

4. **Workforce Transformation**
   An initiative that drives talent growth through upskilling, the use of AI, and enhancing talent development to strengthen capabilities. This strategic initiative has the following core capabilities:
   a. Integrated HC platform
   b. Competency development
   c. Performance monitoring

   With these core capabilities, the Workforce Transformation initiative can contribute to increasing branch productivity (revenue per branch) and enhancing RM productivity (monthly loan disbursement per RM).

5. **Data Analytics and Generative AI**
   Data Analytics and Generative AI is an initiative to enhance insights through continuous data analytics and improve BNI's capabilities with Generative AI. This strategic initiative has the following core capabilities:
   a. Scalable AI implementation
   b. Self-service analytics
   c. Strong data governance

   With these core capabilities, the Data Analytics and Generative AI initiative can contribute to loan growth and deposit growth.

6. **Centralized Common Function, Capabilities and COE**
   Centralized Common Function, Capabilities and COE is an initiative to centralize common functions and capabilities (Bank Wide) to enhance efficiency, security, compliance, and reduce costs.

   This strategic initiative has the following core capabilities:
   a. Enterprise-wide COE
   b. Centralized operations
   c. Lean operating model

   With these core capabilities, the Centralized Common Function, Capabilities, and COE initiative can contribute to improving the Cost-to-Income Ratio (CIR).

7. **Secure, Hygiene and Modernize IT**
   Secure, Hygiene and Modernize IT is an initiative for standardizing IT and the overall application landscape based on the objectives served at each layer for optimal operations and complexity management.

   This strategic initiative has the following core capabilities:
   a. Application rationalization & lifecycle management
   b. Next-Gen security operations
   c. Technology innovation adoption

   With these core capabilities, the Secure, Hygiene, and Modernize IT initiative can contribute to the Long-Term Plan target of improving the Cost-to-Income Ratio (CIR).

8. **Centralized IT Monitoring & Automated Operations**
   Centralized IT Monitoring & Automated Operations is an initiative for a single view for monitoring and observability across various BNI IT environments by combining data from Ops-Dev-Infra sources while leveraging AI/ML to uncover insights. This strategic initiative has the following core capabilities:
   a. Simplified service management
   b. Resilient operations
   c. AI operations

   With these core capabilities, the Centralized IT Monitoring & Automated Operations initiative can contribute to improving the Cost-to-Income Ratio (CIR).

9. **Subsidiary Synergy**
   Subsidiary Synergy is an initiative to enhance synergy among subsidiaries, optimize alignment in system integration, streamline processes, and ensure resources can work together seamlessly. This strategic initiative has the following core capabilities:
   a. Integrated digital channels
   b. Joint business initiatives
   c. Infrastructure harmonization

   With these core capabilities, the Subsidiary Synergy initiative can contribute to the growth of the subsidiaries' Earnings After Tax (EAT).

Service Digitization

As one of the first banks to offer digital banking, BNI has been very consistent with digital innovations to accelerate digital transformation across its business lines and operations. BNI believes that digital innovation will greatly contribute to operational and profitability achievements.

In recent years, the development of information and digital technology e.g. the increasingly popular use of the internet, Artificial Intelligence (AI), Data Analytics, Cloud, and the Internet of Things (IoT) trend has brought major changes virtually every industrial sector. The trend is marked by the increasing use of communication networks and the internet for so many different purposes, automation processes integrated with the help of AI, decision making process using insights generated from data analysis, optimize usage of the Cloud for business and personal needs, and connecting various everyday devices to the internet. The dynamics then influence customer behavior and encourage the creation of more innovative and more adaptive business models.

With this in mind, BNI makes continuous improvements with various innovations to create new customer-driven products and services. BNI's commitment is to maintain and improve service quality while proactively encouraging and developing digital solutions for customers. That's why BNI keeps adapting to changes in customer behavior towards digital as it explores innovations and learns the latest trends in technology use.

In order to optimize innovation both in terms of technology and business process optimization, BNI has since 2007 used the services of an Independent International Research and Advisory Institution to get references, descriptions, trends, and insights into technology and global industrial developments in general and in banking in particular. Some of the adopted key technologies have made significant contributions to the needs of BNI's digital banking product and service developments in recent years.

BNI service products supported by the development of digital technology include the following:

BNIdirect

BNIdirect offers a range of excellent features to support the needs of customer segments and has assigned a dedicated team who assits new customers during the pre- to post-transaction periods within the platform.

1. Integrated Solution
   BNIdirect brings together various financial services that were previously spread across different platforms into one centralized system. This integration not only simplifies financial management but also increases operational efficiency since it reduces time and costs involved. As a one-stop solution, BNIdirect supports customers in making complex transactions in a more organized manner.
2. Financial Dashboard and Digital Onboarding
   BNIdirect provides a financial dashboard with 360-degree visibility covering cash flow, loans, deposits, and financial trends based on real-time data. This easily accessible informative display helps customers make faster amd more accurate strategic decisions. In addition, the digital onboarding process allows customers to register, set up services, and start transactions without the hassle of going through manual procedures, creating a smoother and more efficient onboarding experience.

BNIDIRECT PARTNERSHIP

Through strategic partnerships with various institutions such as schools/universities, healthcare institutions, and governments, BNIdirect expands its capabilities in providing integrated cash flow management solutions. This collaboration enables BNIdirect to provide services that are more in line with the needs of each sector, wether for financial management in education, healthcare, or for government administration. With the support of these partners, BNIdirect can ensure more effective, efficient, and reliable solutions in supporting increasingly complex financial operations in each sector.

- **Campus Financial Ecosystem (CFEST)**
  CFEST is an integrated digital solution from BNI designed to support the transformation of the higher education ecosystem. CFEST provides convenience for universities, lecturers, students, and parents in managing academic activities to financial transactions digitally. With a modern and cashless-based system, CFEST not only accelerates digitalization in the campus environment, but also strengthens BNI's role in driving innovation in the education sector.

- **BNI Smart Healthcare**
  BNI Smart Healthcare is a digital healthcare ecosystem solution that integrates BNI's system with healthcare technology provider partners to support transformation in the healthcare industry. This solution is designed to improve operational efficiency, accelerate digitalization, and encourage collaboration between patients, hospitals, healthcare workers, and healthcare support companies. With an integrated approach, BNI Smart Healthcare strengthens BNI's commitment to presenting technology-based innovations to support the growth of a more modern healthcare sector.

- **BNI Smart Tenant**
  Smart Tenant is an area management ecosystem solution developed by BNI together with platform solution provider partners to meet the digitalization needs in area management. By integrating various services, Smart Tenant supports area managers, tenants, and regulators in meeting management, monitoring, and transaction needs efficiently in one digital ecosystem. This solution reflects BNI's commitment to encouraging digital transformation that increases the ease, transparency, and efficiency of competitive area management.

BNIdirect BUSINESS

In supporting MSMEs to go global, BNIdirect presents various superior features that are specifically designed for the specific needs of MSMEs, helping to build an integrated business ecosystem. The main value offered through BNIdirect is "Simplify Transaction, Personalized, and Comprehensive Financial Report", which is the core of the MSME customer experience.

This platform makes it easy to manage daily transactions efficiently without a complicated process, supporting payments and receipts quickly, safely, and reliably. BNIdirect is also equipped with features that allow customers to categorize and mark transactions based on their type, providing better guidance for monitoring frequent transactions, while paying special attention to areas that require more detailed management.

In addition, BNIdirect simplifies the approval process with a modern and intuitive user interface (UI/UX) design. This new look ensures that MSME customers can easily understand and access existing features, without requiring intensive training. This feature also supports a simple user journey, making the transaction experience more enjoyable and efficient.

To support strategic decision-making, BNIdirect provides integrated financial reports that facilitate MSMEs in business planning, credit applications, and financial analysis. With real-time access to financial positions such as cash balances, receivables, and liabilities, customers can manage their finances effectively, drive business growth, and increase competitiveness, both in local and global markets.

Through a deep understanding of MSME needs, BNIdirect is not only a transaction platform, but also a strategic partner that supports the sustainability and success of MSME businesses in the digital era.

With these features, BNI through BNIdirect wants to ensure that every customer's transaction needs, both large and small, can be met easily, safely, and reliably.

BNIdirect API

In reaching out to various digital ecosystems, especially those that are relevant to people's current lifestyles, BNI provides open banking facilities through API services that can be accessed by various e-commerce, ride-hailing platforms, financial technology (fintech), various university startups, corporate SOEs, Ministries, etc. Digital initiatives carried out by BNI through open banking services include products, digital platforms, and service expansion in ecosystems based on a business to business to consume (B2B2C) model. In 2024, five new features were added to the BNI Digital Services API to improve the user experience and meet the growing needs of our customers:

1. Software Development Kits (SDKs): Where SDKs function as important tools that empower developers to create applications and connect with BNI API. Within the BNI API Digital Services Portal, SDKs can be accessed in multiple languages, including JavaScript, PHP, and Python, providing a versatile and comprehensive resource for developers.
2. Feature-rich sandbox environment and sandbox filling automation: Developers can access the sandbox in minutes, allowing them to run a series tests before releasing an application.
3. Postman Collection: This feature provides convenience for clients or prospective clients by simplifying the service testing process for importing data by presenting a visual representation of the requests and responses of each service.
4. Sample data filling automation feature: This feature allows automatic generation of sample data, making it easier for partners or potential partners to test services and receive sample responses via the BNI API Digital Service Portal.
5. SNAP API: Open Application Programming Interface (API) Standardization Initiative by Bank Indonesia to encourage a strong, competitive and innovative payment system industry while improving the security and reliability of the payment system infrastructure.

It has remained BNI's commitment to improve digital transaction solutions in Indonesia through its 290 regulator-approved API services. A testament to this strong commitment to digital innovation through Open API is that during the period of 2020 to 2024, the Bank garnered six awards, including 'The Best Overall Developer Portal' it won in s toe from 2020 to 2022; and most recently, the Bank was named 'Indonesia Domestic Digital Transformation Bank of the Year', 'Indonesia Domestic SME Partnership Initiative of the Year', and 'Indonesia Domestic API Initiative of the Year' by Asian Banking & Finance Awards 2024.

BNIdirect RECEIVABLES

BNI Receivables has come to support customer needs in managing fund receipts effectively. This service is designed to make it easiear to identify partners or customers who make payments through the Virtual Account feature, which functions as a unique identification number. Every transaction made on the Virtual Account is automatically recorded and posted directly to the customer's main account, ensuring that the reconciliation process runs quickly, accurately, and seamlessly.

Through the BNI Receivables platform, customers can take advantage of various superior features, such as:

- Real-Time Payment Identification: Ensures transparency and ease of monitoring payments from partners or customers.
- Comprehensive Transaction Reports: Provides detailed reporting that can be customized to customer needs.
- Reconciliation Efficiency: Reduces manual workload and the risk of errors in recording transactions.

With high flexibility and scalability, BNI Receivables assists customers from various sectors, including corporations, educational institutions, and e-commerce, in managing cash flow efficiently.

BNIdirect TRADE

As part of BNI's digital innovation, BNIdirect Trade presents the GB Online service designed to improve efficiency and effectiveness in managing bank guarantees for customers. This service comes with various features, such as e-Application for online submission, e-Tracking for real-time monitoring of issuance status, e-Reporting which presents reports of bank guarantees issued or received, and e-Checking which allows verification of the validity of documents through a digital platform. In addition, this service is backed by the BNI m-BG Checking feature, which allows for mobile document validation using QR Code, providing flexibility and reliability of service anytime and anywhere.

BNI CREDIT CARD MOBILE

As well as using the Mobile Banking application, BNI credit card services can also be accessed via the BNI Credit Card Mobile application. This application makes it easy for credit card holders to receive their transaction information via their smartphone. BNI Credit Card Mobile is equipped with features such as billing information, recorded transactions, instalment conversions, bill payments and insurance registration, cash withdrawals, as well as credit limit increase application services, data updates and submission of new credit card applications. BNI Credit Card Mobile also provides information about BNI Credit Card promos and products.

E-KYC BIOMETRIC FACE RECOGNITION & LIVENESS

The use of the Biometric Face Recognition & Liveness feature as e-KYC in the digital credit card application process provides convenience, security and comfort for prospective card holders in the credit card application process.

DIGITAL CARD ISSUANCE

Digital Credit Cards can be issued to applicants who apply for BNI credit cards via digital channels, so that the card holders can use their digital credit cards to make transactions at e-commerce merchants or carry out transactions through BNI Mobile Banking.

VIRTUAL CARD NUMBER BNI CREDIT CARD

BNI Credit Card feature that is used as an alternative payment for more effective and efficient credit card transactions, and offers comfort and convenience in online transactions (card not present) with a unique virtual number as a replacement for the original credit card number that will be used on the BNI Corporate Credit Card.

QRIS SOURCE OF DOMESTIC GOVERNMENT CREDIT CARD (KKPD) FUNDS

QRIS payment feature with Domestic Government Credit Card funding sources using BNI Mobile Banking aims to facilitate operational spending and official travel of work unit, both at central and regional levels with the Government Credit Card (KKP) payment scheme whose processing is carried out through domestic principals.

CONTACTLESS FEATURES

With its Contactless features, credit card holders can make transactions easily, quickly and safely by simply holding or tapping the credit card on the EDC Contactless machine, without having to use a PIN (up to a certain nominal amount). Transactions can be made at any time by card holders at merchants showing the contactless symbol.

BNI MOBILE BANKING

BNI Mobile Banking is one of BNI's digital services to meet customer needs (customer centric) and provide convenience for customers in carrying out end-to-end banking transactions, from the onboarding user process to transactions.

Currently, a variety of digital banking products and services that focus on BNI Mobile Banking have been developed, considering that BNI Mobile Banking offers customers convenience in making transactions easily, anytime and anywhere. In 2024, the development of our mobile banking platform focused on three main aspects: enhancing security, improving existing features, and optimizing services to provide the best experience for customers. This strategic initiative aligned with our commitment to maintaining user trust while ensuring that our services remain relevant, responsive, and secure amidst technological advancements and cyber threats.

BNI AGEN46

BNI Agen46 is BNI's agency service that provides the opportunity for the community to act as an extension of BNI in delivering banking services. With BNI Agen46, customers can access banking services without having to visit a branch office, eventually enhancing financial inclusion across various regions in Indonesia.

To date, BNI Agen46 offers several transaction channels that facilitate both Agen46 customers and agents in providing banking services, including **Android/iOS Mobile Apps, Web, and Electronic Data Capture (EDC)**.

BNI Agen46 features a range of superior functionalities designed to optimally meet the needs of both customers and agents. These features accommodate account opening, cash deposits/withdrawals, fund transfers to other BNI accounts as well as interbank transfers, purchase of digital products (such as phone credit, data packages, transportation tickets), bill payments (such as PLN, PDAM, IPL, SPC), disbursement of government assistance (such as PKH, basic necessities, and subsidies), as well as referrals for other BNI products (such as People's Business Credit (KUR), BNI Wirausaha (BWU), and BNI Credit Cards).

In 2024, Agen46 introduced a range of new features designed to enhance user experience and meet evolving needs:

- **Agen46 Self Registration:** A new facility allowing the community to register as agents independently through a digital platform, without the need to visit a branch office.
- **Student Savings Account Opening:** Supporting financial literacy among the younger generation by providing easy and affordable access to savings accounts for students.
- **Incoming Remittance Feature:** Facilitating cross-border money transfers, expanding agent services to cater to customers with international transaction needs.
- **PLN Feature Update:** Offering a more convenient, fast, and accurate experience for electricity bill payments.
- **ASDP FerizyTicket Purchase:** Enhancing customer experience when purchasing Ferizy tickets, particularly by allowing real-time transaction status checks.
- **PELNI Ticket Purchase:** Simplifying the process for agents to serve customers needing PELNI tickets with a quick and efficient process.
- **Username Customization:** Allowing agents the flexibility to choose and customize their usernames, making it more personal.
- **Integrated Digital Complaint Handling:** Developing an integrated online complaint handling system that is easily accessible, efficient, and cost-free, facilitating BNI Agen46 in managing its operations and business.
- **Self-Promotion Media:** BNI Agen46 can design and print promotional posters and banners directly through the BNI Agen46 application to enhance the effectiveness of their local marketing efforts.
- **Security Enhancements:** Implementing the latest security systems in the BNI Agen46 application.

wondr by BNI

The year 2024 marked our commitment to continuously deliver modern, secure mobile banking services that meet customer needs. Through various strategic innovations, we have focused on enhancing technology performance, user experience, and operational efficiency. Here are our key achievements:

1. Modernization of the Mobile Application Platform
   We have updated the mobile application architecture with the latest technology to improve performance, stability, and scalability. This step ensures that the application remains reliable and capable of meeting the evolving needs of customers.
2. Enhanced User Experience
   An intuitive interface and simplified transaction processes support user convenience. Security is prioritized with the implementation of multi-factor authentication and data encryption. As a result, customer satisfaction levels have significantly increased. [ACGS B.4.1]
3. Digitalization of KYC Processes via Video Call
   The implementation of a video call-based KYC system facilitates users in verifying their identities without having to visit a branch, ensuring efficiency and data security in compliance with regulations.
4. Personal Finance Management (PFM) Feature
   We have introduced a PFM feature that helps customers manage their finances through automatic recording, transaction categorization, and AI-based financial recommendations, making the application a holistic financial solution.
5. Integration of Digital Lifestyle
   Our application is now integrated with lifestyle services, such as purchasing whoosh train tickets, creating a seamless experience for customers' financial and lifestyle needs.
6. Flexible Native Mobile Application
   Our application is designed to be compatible across various devices, offering a hyper-personalized experience tailored to individual customer needs.
7. High Performance and Scalable Backend System
   The microservices architecture supports fast processing, reliable scalability, and uptime of up to 99.99%, maintaining service reliability even during activity spikes.
8. Single Sign-On for Efficient Operations
   The Single Sign-On (SSO) system simplifies access for operational teams, enhancing efficiency in supporting customer services.
9. Integrated Monitoring Dashboard
   The all-in-one dashboard provides real-time oversight of application and backend system performance, ensuring that technical issues can be addressed before impacting users.

With these innovations, we remain committed to delivering services that are relevant, secure, and integrated with customers' financial and lifestyle needs.

BNI DigiCS & DigiCS LITE

BNI DigiCS & DigiCS Lite are self-service machines that replace the activities of Customer Service (CS) officers. With BNI DigiCS & DigiCS Lite, customers can carry out CS activities independently (self-service). The features in this service include opening an account, changing cards, unblocking debit cards, activating e-channel, resetting pins, purchasing and topping up Tapcash, and printing mutation/account history.

With the DigiCS & DigiCS Lite services, CS officers in branches can focus on CS advisory and sales activities. Besides that, this service also reduces customer waiting time. Activities can be carried out quickly, easily and safely thanks to such user-friendly technology. More details can be found at: https://digitalservices.bni.co.id.

BNI DPLK SURE

BNI DPLK SURE is an application to support the BNI DPLK business in providing convenience and solutions for managing retirement planning for BNI DPLK customers. The services provided by BNI DPLK SURE consist of account opening, deposits, claims, balance information, and fund management according to the investment package chosen by the customer. Apart from that, BNI DPLK Sure is also connected to BNI Mobile Banking, BNI ATM, and BNI Direct so that customers can make transactions anytime and anywhere. The BNI DPLK Investment Package consists of various products, namely deposits, bonds, mutual funds, sharia mutual funds, and others.

Then, apart from the main services for customers, there are other modules in DPLK Sure, such as reconciliation, integration, daily accrual modules, reporting modules to regulators and operational monitoring, which strengthen the reliability of DPLK Sure, while also meeting the requirements of regulators.

DPLK BNI became a market leader in the pension fund management industry in Indonesia since 2001. As of December 31, 2024, DPLK BNI's AUM (Asset Under Management) reached IDR33.3 trillion with a total of more than 900 thousand customers, both corporate and individual.

BNI NEW PREPAID SYSTEM

BNI has developed a system to support the prepaid card product business of Bank BNI, namely TapCash. Several features are already operational and available for customers, including Online Top-up for TapCash and Retry Update Balance. The Retry Update Balance feature is a standout feature within the BNI New Prepaid System, as it provides convenience for customers to ensure that their balance is successfully updated even in the event of a failure during the Update Balance process. Through this feature, customers are given up to three opportunities to tap Update Balance to ensure that the balance on their card is synchronized correctly. Furthermore, the BNI New Prepaid System is equipped with the Reversal Pending End of Day (EOD) feature. This feature is designed to provide additional protection to customers in situations where the top-up process is pending. If the balance in pending status is not updated by the end of the day, the system will automatically perform a reversal, returning the pending balance to the customer's account. With this feature, customers can feel more at ease knowing that their balance is secure and will not be lost.

The combination of these features demonstrates the commitment of the BNI New Prepaid System to provide more reliable, secure, and user-friendly services, thereby enhancing customer satisfaction in their transactions.

SIMPONI DPLK BNI

The DPLK Simponi website is an application that supports the development of the DPLK (Financial Institution Pension Fund) business and aims to foster business growth by integrating information technology, human resources, comprehensive banking products and services, as well as the market potential available. The pension program from the Financial Institution Pension Fund of PT. Bank Negara Indonesia (DPLK BNI) has been operating since 1994 based on the Pension Fund Law.This program is open to all segments, including civil servants/private employees, state-owned enterprises (BUMN)/regional-owned enterprises (BUMD), professionals, and business practitioners who seek financial security in retirement.

This application provides convenience and solutions for managing the retirement planning of DPLK BNI customers. The services available on SIMPONI DPLK BNI include account opening, fast tracking of disbursements, data updates, balance information, and fund management according to the investment package chosen by customers. The DPLK BNI Investment Packages consist of various products, including Deposits, Bonds, Mutual Funds, Sharia Mutual Funds, and others. In addition to these main services for customers, there are other services such as branch location information, dashboards, consolidated balances, e-statements, e-claims, auto-debit, transaction history, and RC mutations.

In 2024, a system upgrade was implemented to ensure users had the best experience. This system renewal was designed to enhance three main aspects: improved system security, faster and more responsive performance, and new features to meet users' current needs.

BNI MERCHANT (EDC AND QRIS)

This is a mobile-based application used by BNI merchants to support their daily QRIS and EDC transactions. BNI Merchant is equipped with superior features, including same-day merchant payments, digital merchant registration, real-time transaction notifications and biometric login technology. In the future, superior features will be added, including cashier features and after sales service features.

TapcashGO

BNI TapCash is a refillable chip-based electronic money that can replace cash and used for payments at merchants in collaboration with BNI.

Here are some of the benefits of using BNI tapcash. Faster payment transactions (transactions < 2 seconds). Available for both BNI customers and non-customers. Can be topped up. No minimum transaction value. Can be transferred to any party. Does not require PIN and signature.

BI SNAP (NATIONAL STANDARD OPEN API PEMBAYARAN)

BI SNAP is a nationally applicable messaging standard, which regulates the implementation of Payment Open Application Programming Interfaces (API) to improve access and digital payment services in Indonesia.
SNAP BI aims to:

- Ensure customer data security
- Prevent misuse of personal data
- Create a healthy, competitive, and innovative payment system industry
- Promote integration, interconnection, interoperability, and security and reliability.

SNAP BI standardizes several things, such as:
Communication protocol

- API architecture type
- Fund structure and format
- Authentication, authorization, and encryption methods
- Provisions on API access management
- Data request and response formats

Services and Networks

BNI remains committed to providing the best banking services to customers through a combination of digital and face-to-face services to improve customer experience and facilitate customers in making transactions at the Bank. BNI keeps expanding its networks and services through **Branch Transformation** as one of its main focuses in answering various customer needs.

STRATEGIES AND POLICIES IN 2024

In the increasingly competitive and fast-paced banking industry in the current digital era, BNI remains committed to transforming banking services to meet increasingly complex customer demands. In 2024, BNI focused on transforming its office network to improve customer service with reliable e-channels and digital through BNI ATM, CRM, DigiCS, wondr & BNIdirect; growth in outlet productivity and operational process efficiency. The branch transformation was supported by:

- **Office network optimization,** by strengthening optimal office networks with 4 (four) new outlet formats for business penetration of all customer segments with due consideration of market distribution and coverage.
- **Strengthening sales models & business processes** that support branch productivity.
- **Optimization of O-branch** into a mobile banking café for acquisition penetration in Housing, School, University and Public Area areas.
- **Placements of Branch Digital Assistants,** to optimize Shifting Transactions to increase customer transactions.

PERFORMANCE IN 2024

Until December 2024, in line with its network and service-related strategy and policies, BNI made adjustments in 246 of its office networks into 4 (four) new outlet formats; Super Flagship, Business Flagship, Thematic and Digital First, which provide convenience for customers in making banking transactions with a digitally integrated service process both through e-channels and wondr. Through the features offered in the new outlet format, including the placement of Branch Digital Assistants throughout the office network, BNI believes that customers will experience a fast, easy, safe, and transparent digital technology-enabled banking experience. BNI has also presented banking cafés that add to customer convenience in transacting at BNI Outlets and e-Channels. In addition, in penetrating business acquisitions in the Housing, School, University, and Public Area areas, BNI optimized 16 (sixteen) of its O-branches in 2024 into mobile banking cafés.

STRATEGIES AND WORK PLANS FOR 2025

BNI will remain committed to providing banking services to meet increasingly complex customer needs. In 2025, BNI will continue its network and service transformation through **Branch Transformation** by executing the following strategies and work plans:

1. **Optimizing the distribution network**, both office and e-channels & digital networks that are integrated in line with the customer journey and operating model based on advisory & service-to-sales.
2. Strengthening the **sales model & sales management** depending on the type of outlet and the potential of each region.
3. Optimizing the **growth opportunities for derivative businesses (value chain)** from the wholesale customer ecosystem in a close-loop manner, from wholesale customers, distributors, suppliers, to payroll, as well as working on superior business potential to increase CASA & FBI.
4. Streamlining the process at outlets through digitalization and accelerating the migration of transactions to digital channels.

Customer Experience Center

Customer Experience Center was formed by BNI with several functions as i.e. touch points, voice of customer, financial counsel, mediation to regulators, consumer protection, and telesales. One of the center's main functions is to serve as one of BNI's touch points that always deliver fast, affordable, yet still the best services for customers where the customers can get information, make transactions and get solutions to every problem through an integrated omni channel platform. The objective is to create positive perception through the customer journey to build strong relationships with customers and push repetitive business growth.

Customer Experience Center services consist of:
- 24-Hour Phone Service: BNI Call 1500046 (access from within the country) or +62-21-30500046 (from abroad), 1500098 (Emerald Customers), and 1500146 (Merchant Care and Agen46).
- E-mail: bnicall@bni.co.id.
- BNI Live Chat: Chat with us at www.bni.co.id, WhatsApp 0811-588-1946, Ask BNI at BNI Mobile Banking, and BNI Call Virtual Assistant.
- Social Media Platforms: Instagram at @bni46, Facebook at BNI, and X at @BNI & @BNICustomerCare.
- CX wondr is a video banking service connected to the wondr by BNI application to make it easier for customers who experience problems during activation or when opening a savings account through the wondr by BNI application.
- CX Sales is an outbound campaign to convey BNI product offers to prospective customers.

STRATEGIES AND POLICIES IN 2024

Customer Experience Center is committed to always maintaining and improving the quality of service by making continuous improvements through various innovations that focus on customer centric to improve customer experience as a form of supporting BNI's strategy towards a sustainable business. In 2024, Customer Experience Center has realized the following strategic plans and policies:

1. Improving employee competency through training that can form a digital mindset, analytical thinking, communication skills, sales skills, and service oriented.
2. Accelerating complaint resolution through data input accuracy and improving the Service Level Agreement (SLA) for complaint resolution.
3. Reviewing and creating Standard Operating Procedures (SOP) as process improvements, improving service quality, and mitigating risks to the implementation of employee activities.
4. Optimizing digital services to improve service & sales.
5. Improving business processes through optimizing data analytics and voice of customers that support the company's business.
6. Optimizing the supervisory function of the implementation of work activities according to SOP, authority management and data access arrangements to reduce the risk of operational fraud.

ACHIEVEMENTS IN 2024

Various strategies and policies that have been implemented have succeeded in making the Customer Experience Center achieve achievements throughout 2024, including:
1. The Best Call Center from the Bank Service Excellence Award 2024
2. The Best Overall Contact Center from the Bank Service Excellence Award 2024
3. The Best Phone Banking from the Bank Service Excellence Award 2024
4. The 2nd Best Social Media from the Bank Service Excellence Award 2024
5. Gold Winner of The Best Customer Experience from The Best Contact Center Indonesia 2024
6. Silver Winner of The Best People Development from The Best Contact Center Indonesia 2024
7. Gold Winner of The Best Agent Digital Media Sosial from The Best Contact Center Indonesia 2024
8. Bronze Winner of The Best Agent Digital Chat from The Best Contact Center Indonesia 2024

9. Bronze Winner of The Best Agent English from The Best Contact Center Indonesia 2024

In addition, Customer Experience Center is also becoming a benchmarking place in the field of Customer Experience for other companies in Indonesia, this shows that BNI is a benchmark for Customer Experience Centers in Indonesia.

STRATEGIES AND WORK PLANS FOR 2025

In line with BNI's 2024-2028 Corporate Plan, the Customer Experience Center is committed to maintaining and improving service quality and supporting the creation of branch transformation, increasing transactions and market share growth. The 2025 strategy and work plan are outlined in 5 (five) main focuses, as follows:

1. Adding Customer Experience features to the wondr by BNI application to make it easier for retail customers to transact and interact with BNI.
2. Adding Customer Experience features to the BNI Direct application so that wholesale customers can submit complaints more easily, cheaply and quickly and track the status of complaint resolution.
3. Improving the sales process that prioritizes Customer Experience through the use of a new design for multi-product sales so that sales are more productive and have an impact on achieving fee-based income.
4. Integration of all call center telephone numbers as a risk mitigation to prevent fraudulent fake call center numbers.
5. Maintaining consistency in improving Customer Experience through improving HR competency or people development.

CONSUMER PROTECTION

BNI is committed to consumer protection and the community by providing the best service and product delivery in accordance with customer needs as a form of compliance with regulators in accordance with applicable regulations, including POJK No. 22 of 2023 concerning Consumer and Community Protection in the Financial Services Sector and Bank Indonesia Regulation No. 3 of 2023 concerning Bank Indonesia Consumer Protection and other relevant laws and regulations.

As a concrete manifestation of its commitment to consumer protection, BNI has established a Consumer Protection Department under the Customer Experience Center Division. This department aims to ensure that the implementation of consumer protection is tangibly felt by consumers and the public. Its functions and scope include planning and execution, socialization and education on consumer protection, monitoring and evaluating consumer protection activities, and reporting to BNI Management (the Board of Directors and Board of Commissioners) as well as to regulators such as the Financial Services Authority (OJK) and Bank Indonesia (BI).

BNI has a consumer protection policy through company guidelines that are adhered to by all BNI employees. With the existence of consumer protection company guidelines, all BNI employees are expected to have a good understanding in implementing consumer protection including in carrying out BNI product and service activities in accordance with the provisions stipulated by the regulator, including:

1. Product and/or service design.
2. Provision of product and/or service information.
3. Delivery of product and/or service information.
4. Marketing of products and/or services.
5. Preparation of agreements related to products and/or services.
6. Provision of services for the use of products and/or services.
7. Handling complaints and resolving disputes over products and/or services.

BNI has proactively implemented various strategic steps in implementing consumer and community protection, including by conducting socialization and education on consumer protection both online and offline.

Online socialization and education are carried out through social media Instagram and Tiktok with the account name @cxc.protection which contains educational content with themes including:

1. Safe Tips for Financial Transactions
2. Beware of Banking Crime Modes
3. Avoid Online Gambling (Judol)
4. Beware of Illegal/Fake Investment Traps
5. Introduction to Official BNI Products and Services

BNI's contribution in implementing consumer protection consistently and massively through social media has received the 2024 Joint Consumer Protection Movement (Geber PK) Contributor Appreciation from BI.

Furthermore, BNI has also implemented various offline consumer protection socialization and education agendas, including:

1. Consumer Protection Education for Students and Pupils throughout South Jakarta at the Indonesia Banking School Kemang Jakarta on January 22, 2024 with OJK.
2. Consumer Protection Education for Students in Klungkung Bali on June 3, 2024 with BI.
3. Consumer Protection Education for the Community and the Waste Care Community in Bantargebang Bekasi on June 14, 2024 with OJK.
4. Consumer Protection Education for Students at Trisakti University Jakarta on October 15, 2024 with OJK.

The active role of the BNI Board of Directors as a form of BNI's commitment and seriousness in implementing consumer protection can also be seen from the participation of the BNI Board of Directors in various consumer protection agendas, including:

1. Consumer Protection Education with the Director of Network & Services to Indonesian Migrant Workers in Hong Kong on February 25, 2024.
2. Protection Education with the Director of Network & Services to Indonesian Migrant Workers in Japan (Tokyo and Osaka) on June 29-30, 2024.
3. Consumer Protection Education with the Network & Services Director to Construction Workers in the Nusantara Capital City (IKN) on August 16, 2024.

In addition, BNI currently also has friendly service and infrastructure standards and makes it easier for people with disabilities to access financial services, both savings products and business capital support in the form of credit/financing for disabled MSMEs. These various facilities make it easier for customers with disabilities to transact and interact with BNI.

PERSONAL DATA PROTECTION

BNI recognizes that customer trust is a highly valuable asset. Therefore, BNI is committed to ensuring that customer information or Personal Data remains secure during the Personal Data Processing (and during the Retention Period) in accordance with Law No. 27 of 2022 dated October 17, 2022, concerning Personal Data Protection.

In implementing this commitment, BNI has established a Data Protection Officer (DPO) responsible for monitoring and ensuring compliance with Personal Data Protection regulations. Throughout 2024, BNI made continuous adjustments to internal policies and procedures, conducted training and socialization for all employees, recorded personal data processing, assessed the impact of personal data protection, managed risks related to third parties, established mechanisms for handling personal data protection failures, and utilized electronic systems equipped with adequate security levels based on applicable regulations.

Currently, customer consent for optimal service by receiving promotions/information/product/service offers from BNI can be provided through various available channels, including the nearest branch office, wondr, BNI Mobile Banking, and DigiCS. The provision of personal data to the BNI Group and/or Business Partners is based on the consent of the respective customers. In this regard, BNI has established a Privacy Notice (accessible at the link https://www.bni.co.id/id-id/individu/pemberitahuan-privasi) as a form of transparency regarding how BNI collects, uses, and protects customer personal data.

To provide the best personal data protection, BNI is committed to continuously evaluating the implementation of personal data protection on a regular basis in line with technological advancements and applicable regulations.

Data Management & Analytics

STRATEGIES AND POLICIES FOR 2024

Data Management & Analytics is BNI's key strategy in managing, storing, and analyzing data to support a better, more efficient, and more accurate business decision-making. A combination of proper data management and advanced analytical techniques, allows BNI to build competitive advantages, improve operational efficiency, and accelerate business innovations in the pursuit of its stated Vision of becoming a Financial Institution with Sustainable Service and Performance Excellence.

In practice, the 3 (three) key strategies of the Data Management & Analytics Division (DMA) will support BNI's business performance and keep it within regulatory compliance:

1. Development of HR capabilities through training and certification to accelerate adaptation to change, build a data-savvy culture, and improve understanding of data usage in business decision making.
2. Implementation of advanced analytics to generate quality leads that contribute to improving business performance, especially in digital channels.
3. Utilization of the latest technology and improvement in technological capabilities to provide added value for retail customers through the implementation of need-based product personalization using a recommendation system.

During 2024, BNI successfully conducted an analysis of business potential, potential leads, reports and dashboards that have been utilized to support the achievement of business targets. BNI makes continuous improvements in the data management aspect, modernizes reports in the form of dashboards and quality data analytics system and HR capabilities that are expected to improve the quality of analysis results to assist in decision making. BNI also produces AI-based analysis using state-of-the-art methods that are utilized to improve business, operations and risk. The results of the analysis are manifested in several priority projects for RACE digital transformation to drive business growth in each segment.

In 2024, BNI in Data Management & Analytics focused on the following:

1. Improving human resources (HR) capabilities in data engineering, data analytics, data science, and data visualization through on-the-job development, training and certification that could accelerate innovations and adaptation to industrial developments.
2. Improving business performance and realizing sustainable value creation through the development of advanced analytics and the application of the latest technology to encourage market-driven innovations.
3. Increasing the success rate and contribution to significant business impact by implementing more focused strategies, optimizing operational processes, and utilizing data and technology to make more informed decisions.
4. Improving overall bank performance through comprehensive monitoring, backed by improving business initiative monitoring capabilities using automation solutions that also increased dashboard visibility and accessibility; and improving operational processes by implementing automation solutions in the Regulatory Report Solution (RRS), and pairing the effort with strengthening business processes by adding capacity and capabilities of Business Intelligence tools.
5. Increasing the capacity and capability of Big Data to support the processing of larger and more complex information, and increasing the availability and reliability of the Data Platform to ensure fast, safe, and consistent access to data that are needed in strategic decision making.
6. Strengthening the data governance function to ensure more structured, transparent, and secure data management that aligned with the implementation of the Personal Data Protection Law (UU PDP) to comply with regulations, protect user privacy, and increase stakeholder trust in data management.

INNOVATIONS IN 2024

The DMA Division makes continuous improvements with a laid focus on providing data and analytics to support the BNI Transformation Project. Here are some of the activity highlights of the DMA Division in 2024:

1. Increasing the capacity of the war room to support more effective data visualization and making them accessible by more users, as well as easy dashboard access through the integration of LDAP user logins, which is expected to increase the number of viewers and facilitate use by various related parties.
2. As part of efforts to support digital transformation and integrated data management, Data Management and Governance continues to develop strategic initiatives that focus on efficiency, accuracy, and regulatory compliance. Some of the main activities carried out include:
   a. Dashboard Server Capacity Expansion.
      Expanding the Dashboard server capacity by adding nodes to allow access by more users simultaneously in a specific point of time. This step aims to support increased operational efficiency and scalability of the analytical system used by various work units.
   b. Big Data Capacity Expansion
      Developing Big Data infrastructure by adding 11 new nodes and increasing storage capacity. This initiative allows faster data access and larger processing capacity, while meeting the needs of increasingly complex data analysis.
   c. Implementation of SSDP (Self-Service Data Preparation)
      Implementing SSDP to support self-service applications in the Regional Control Function (RCF) area. This solution enables end-to-end data provision through web-based access, hence, supporting the implementation of the SSOT (Single Source of Truth) concept. The solution allows for more accurate and efficient data processing.
   d. Provision of Datamart Notification System
      Providing an automatic notification system to monitor the availability of tables in the datamart. This system checks the tables that form the datamart extracted directly from the database server before they are loaded into the datamart, ensuring the adequacy and accuracy of the data available for operational and analytical needs.
   e. Implementation of the Personal Data Protection Law (UU PDP)
      Supporting the implementation of the PDP Law passed on September 20, 2022 to ensure BNI's compliance with government regulations. Compliance support efforts include the creation of Records of Processing Activities (ROPA) to document the bank's personal data processing activities, procure a PDP Law Consultant to assist in implementing best practices for implementing the PDP Law, and share preparations for implementing the PDP Law in BNI's Subsidiaries and BNI's KLN.
3. Launch of BNI Campaign Management, including centralization of lead management, tracking and monitoring of campaign programs, and evaluating programs through campaign analytics. Campaign management should increase its effectiveness.
4. In early 2024, BNI launched a series of digital innovations, including the implementation of chatbot product knowledge in the New Digisiales application, online gambling and fraud transaction analytics using graph analytics and machine learning, and developed merchant analysis and product recommendations for consumer banking. Also undertaken were credit card revolving and churn analysis, determining transaction branches based on location, and clustering branch transformation. BNI also launched of PMS Digital Assistant and the first phase of Generative AI to further strengthen customer service and experience.

STRATEGIES AND WORK PLANS FOR 2025

The DMA Division supports business growth in accordance with the Bank's Business Plan by increasing system and human resource capabilities, clear and transparent reports, delivering excellent analytical results, and strengthening the data governance function. In 2025, DMA will focus on implementing the following strategies:

1. Effectiveness of analytics/leads that improve business performance including segments, products, and channels.
2. Improvement of data management platform for various business support needs.
3. Implementation of Data Lake House to support scalability of data processing, storage and analysis in supporting various types of reports, dashboards and analytics.
4. Implementation of Metadata Management Platform to support data governance framework and single source of truth.
5. Implementation of campaign management to support business improvement and centralization of leads management.
6. Implementation of advanced analytics methods to provide leads/solutions/recommendations, as well as AI-based innovation as a manifestation of value creation for business.
7. Exploration of the latest technology data in the market to optimize work processes in DMA and business processes.
8. Supporting the formation of a strong data culture through self-service dashboards.
9. Improving Human Resources (HR) capabilities through development, training and certification.

Service Quality Function

IMPROVING SERVICE QUALITY AS ONE OF THE STRATEGIES TO ENCOURAGE BNI BUSINESS ACCELERATION

Service quality improvement is one key strategy that BNI has adopted to accelerate business growth with the acquisition of new customers while maintaining the loyalty of its existing ones. With higher service quality, BNI can face the increasingly tight competition, capitalize on growth opportunities in the digital era, and further cement its position in the banking market. BNI will continue to create excellent services across touch point network, that functions to support BNI as the Bank makes consistent efforts to become the Leading Financial Institution in Service and Performance, which will ultimately lead to the creation of a positive experience that can build long-term relationships and increase customer satisfaction and loyalty towards BNI.

INITIATIVES AND SERVICE DEVELOPMENT STRATEGY

As competition in the banking business increases, BNI has been more consistent in undertaking initiatives and executing improvement strategies to produce added value for service quality that aligns with customer needs. During 2024, BNI took 3 (three) strategic steps to improve service quality; Increasing Customer Preferences, Increasing Outlet Productivity, and Optimizing Service Digitalization.

1. Customer Preference Enhancement

a. **Enhancing the capabilities of officers at all customer touch points to provide fast, personalized, solution and business creation services. This strategy includes:**

i) **Frontliner Academy (FLA)**
A learning program delivered on an integrated learning platform that is easily accessible with materials in the form of soft skills and hard skills according to the competencies needed by all frontliners. This program aims to support the improvement of competency standards in BNI products and services knowledge, work culture, prudential principles and the implementation of risk culture and anti-fraud awareness.

The FLA program consists of 3 (three) stages and each stage has the following learning methods:

- **Basic**
  The applied method at this stage is self-learning with a delivery format in the form of e-learning, post-test, and micro learning. Frontliners will receive materials related to the introduction and general knowledge of the company, BNI products and services that can be accessed through the Frontliner Academy feature in BNI Smarter.

- **Intermediate**
  This stage is an advanced stage after participants have completed the entire series of learning at the Basic stage, the materials are adjusted according to the position (Customer Service, Teller, BNI Digital Assistant, and Frontliner as Roster). At this stage, participants will also receive materials with the form as delivered in the Basic stage.

- **Advance**
  This is the final stage of the FLA program after participants have completed the Basic and Intermediate stages. In the final stage of the FLA program, the training is divided into two sessions, namely Self Learning and In Class Training sessions.

  To see how participants understand the material and how the training goes, an evaluation will be conducted at each stage as follows: Circle-1 Evaluation (Learning Reaction) for the Advance stage; Circle-2 Evaluation (Learning Gain) for the Basic, Intermediate and Advance stages; Circle-3 Evaluation (on The Job Behavior) specifically for the Advance stage and Circle-4 Evaluation

(Result) specifically for the Advance stage with the target of opening a New CIF account (excluding Walk-in customers who come to the outlet/ banking hall).

ii) **Sharing Information Regarding Operations and Services (SIS OLA) of Branches/ Outlets**
A program initiated to improve the performance of frontliner officers in delivering services and solutions according to customer expectations and personalizing services according to customer segments and needs. This online run program is also an effort to achieve business targets faster while increasing the business potential of each customer who comes by improving service quality and product knowledge.

iii) **BNI Excellence Leader (BEL)**
A consistent and sustainable refreshment program for Leaders run to improve understanding and knowledge of service aspects that are points in service assessments and to make Leaders role models in service activities.

iv) **Fun Referral**
A program run under collaboration with BNI Life that serves as one of the enablers to increase awareness and self-confidence of all Frontliners and Leaders at Outlets in offering BNI Life insurance products to accelerate BNI and BNI Life businesses.

v) **TFT Customer Service Officers**
A Quick Win program to improve the capabilities of Customer Service officers who will become facilitators with comprehensive material provision.

b. **Measuring and monitoring service quality performance to accelerate business at outlets and as a medium to obtain direct feedback from customers on business, service and operational improvements.**

i) **Customer Satisfaction Survey (CSS)**
A survey conducted to identify and measure the level of satisfaction of BNI's external and internal customers on the quality of services provided. This survey is the voice of customers that evaluates customer satisfaction through the 7P aspects: Product, Price, Place, Promotion, People, Process, and Physical Environment as well as employee satisfaction with assessment aspects including Coordination, Communication and Cooperation; Work Results/Output; Work Process; Commitment/SLA; Employees; and Provision of Data/Information.

ii) **Service Experience Index (SEI)**
A system for measuring and monitoring the quality of BNI services covering all regions, branches and outlets, which is carried out periodically and continuously. SEI is measured through 3 (three) dimensions with strong level of independence, allowing the measurement results to reflect the outlet's service conditions more realistically. The three dimensions are:
1. Dimension 1: BNI Service Performance in National Banking Industry
2. Dimension 2: Customer Experience
3. Dimension 3: People Competency

SEI is also one of BNI's efforts to encourage all outlets to increase business through improvements and enhancements in customer service quality and to provide support for achieving BNI's service and business targets.

iii) **Branch Visit & Fact Finding**
A program aimed at improving the quality of frontliner services to support the outlet's business improvement and increase the unit's Compliance Risk Awareness in carrying out operational activities and services according to regulations.

iv) **Online CCTV Monitoring**
One of the monitoring tools is CCTV media, aiming to measure the consistency of frontliner service when serving customers at branches/outlets in real time.

v) **CCTV Outlet Monitoring**
Apart from using online CCTV media for real-time monitoring, BNI also maximizes monitoring through CCTV outlet recordings to track frontliner service activities and ensuring compliance with established service standards.

vi) **BNI Service Rating**
This is one of the tools or aids used by BNI to measure the level of customer satisfaction (feedback) on the services received. Customers provide direct assessment (rating), enabling follow-up actions for improvement or enhancement (evaluation) at each branch office and outlet.

2. Improvement of Outlet Productivity

Enhancing the capability of service officers capable of identifying customer needs with service solutions by increasing digital transactions via shifting transactions to digital while strengthening and optimizing automation and digital devices to improve the quality of service to customers. Given below are some of the activities carried out:

a. **Selling Skill for Roaster Training**
This is one of the capability developments for critical frontliner positions (CS and Teller) in improving the capabilities of officers who will be shifted to Roster (Sales Farmer).

b. **New Channel Model**
BNI has carried out Corporate Transformation Program as a comprehensive business transformation effort in all aspects and decided on 5 (five) outlet formats, for branch offices and sub-branch offices, namely Super Flagship, Business Flagship, Thematic, Digital First and Smart Conventional. The outlet format refers to the type of location and business model used to provide banking services to customers which varies depending on the city tiering (Top Metro, Metro, Urban and Rural) and transaction complexity.

The outlet format has been set to make differention based on customer location and specific needs. The outlet is supported by a layout that carries the concept of zoning and features integrated e-channels and digital tools.

New Outlet Format:

- **Super Flagship**
  Super Flagship is an outlet format for branch offices that functions as a financial supermarket for all customers, especially wholesale and priority banking customers, dominated by Emerald's AUM (Asset Under Management) portfolio and a high number of diamond clients in the Top Metro city tiers.







- **Business Flagship**
  This outlet format has relatively complete facilities in terms of people, authority, infrastructure and can be equipped with a business lounge (according to needs), especially to support the activities of wholesale and commercial/SME customers with a high number of transactions. The Business Flagship Outlet can function as a community center for all customers, especially wholesale customers in the Top Metro, Metro and Urban city tiers.







- **Thematic**
  A format for a branch office outlet that is adjusted to the lifestyle of its surroundings, such as tourist locations (experience center), education, business (community center), upscale residence, hospital and can also be adjusted to the scope of business handled by the OBO (Outlet Business Optimization) outlet or to serve wholesale transactions. Thematic Outlets are in the Top Metro, Metro and Urban city tiering.








- **Digital First**
  This outlet format is specifically designed for sub-branch offices that are dominated by simple transactions and can be completed at any available e-channel machine with complete features. Digital First outlets are located in the Top Metro, Metro and Urban city tiers and in urban ceters such as malls, stations or airports, to facilitate fast-moving customer transactions.






- **Smart Conventional**
  This outlet format is specifically designed for branch offices and sub-branch offices. Smart Conventional has a relatively the same appearance as the existing ones, the only different is they come with e-channel machines and customer service using a flow that is oriented towards digital transactions. Smart Conventional outlets are located in the Urban and Rural city tiering.






3. Service Digitalization Optimization

The service strategy of all digital channels as automation-based banking services and self-services for all customers/potential customers to enjoy with prioritized digital process through fast, reliable and personalized services. The strategy is executed as:

a. Branch Digital Services
   i). DigiCS
   A customer service machine that can be used for self-service with various features that can be accessed by walk-in customers both BNI and non-BNI Customers.
   ii) DigiCS Lite
   BNI's digital channel to improve customer experience through speed of digital services as well as customer education. DigiCS can mitigate the risk of fraud in officer services.
   iii). BNI SPRINT (Self Service Passbook Printer)
   BNI Channel that prints account transaction history on savings books in the form of receipts and can be sent via e-mail using a Chip Debit Card as a verification tool. BNI SPRINT functions to optimize customer service tasks at Branch Offices in serving Customers as one form of branchless transformation in the digital era.
   iv). T-Care
   A machine that can be used for banking transactions via Self Service to avoid queueing at the Teller.

b. **Biometric Fingerprint**
   A verification tool for the accuracy of customers/protective customer identities by matching fingerprints when opening an account or data maintenance and supervisor authorization. This Biometric Fingerprint also serves to expedite and simplify the process of opening a BNI account for new customers and mitigate the risk of processes without customer presence. With this tool, operational risks (fraud) caused by account opening, data maintenance, and transactions without customer presence as well as misuse of User ID/Password can be mitigated.

   The biometric fingerprint module consists of:
   - Enroll (customer fingerprint recording)
   - Account Opening
   - Transaction
   - Customer Data Maintenance
   - Supervisor Authorization

   As of December 31, 2024, the biometric fingerprints system had been implemented in 1,765 from 1,780 BNI outlets with the following data:
   - 197 Branch Offices (100%)
   - 1.583 Sub-Branch Offices (99.05%)

BNI'S ACHIEVEMENT IN OFFERING QUALITY SERVICE AT EVERY TOUCH POINT

BNI embraces its commitment to maintain and improve the quality of service at every touch point that leads to the creation of customer satisfaction and loyalty. This strategy has been adopted to realize BNI's Vision of becoming a Financial Institution with Sustainable Service and Performance Excellence. In 2024, BNI again garnered a series of awards that fell under satisfactory qualifications. Some of the awards BNI received were from Infobank Magazine and Marketing Research Indonesia (MRI) for the Conventional Bank category, namely:

1. The Best Overall Contact Center
2. The Best Phone Banking
3. The Best Call Center
4. The Best Overall E-Banking
5. The Best Branch ATM
6. The 2nd Best Social Media
7. The 2nd Best Mobile Banking
8. The 2nd Best Overall Digital Channel
9. The 2nd Best SMS Banking
10. The 3rd Best Conventional Bank in Service Execellence

06

Capital and Risk Management Practices

Capital	474
Risk Management Practices	476
Risk Exposure Disclosure	518

Capital and Risk Management Practices


BNI
BNI
BUKA TABUNGAN DIGITA
MENARA BNI

Capital

MANAGEMENT POLICY ON CAPITAL STRUCTURE

The aim of capital structure management and capital adequacy is to ensure that BNI consistently maintains sufficient capital to cover risks and support its business strategy while complying with regulatory requirements. In calculating capital adequacy, BNI refers to the provisions of the Financial Services Authority (FSA), including the following:

1. Financial Services Authority Regulation No. 11/POJK.03/2016 concerning Minimum Capital Requirements for Commercial Banks as amended several times, most recently by Financial Services Authority Regulation No. 27 of 2022 dated December 26, 2022.
2. Financial Services Authority Circular No. 26/SEOJK.03/2016 dated July 14, 2016 concerning Minimum Capital Requirements for Commercial Banks according to Risk Profile and Fulfillment of Capital Equivalency Maintained Assets.

To measure BNI's capital ability to absorb risk, BNI calculates the Minimum Capital Requirement (KPMM) through the following stages:

1. Calculate the minimum capital adequacy of 8% of total RWA using the risk weighted asset (RWA) measurement methods in accordance with regulatory requirements, as follows:
   a. Credit Risk: Standardized Approach and Internal Rating Based Approach.
   b. Market Risk: Standardized Approach and Simplified Standardized Approach.
   c. Operational Risk: Standardized Approach.
2. Calculate KPMM according to BNI's risk profile. Based on POJK No. 11/POJK.03/2016 concerning Minimum Capital Requirements for Commercial Banks as amended several times, most recently by POJK No. 27 of 2022 dated December 26, 2022, states that risk profile rank 2 (low to moderate) has a minimum CAR of 9% to less than 10%. BNI's KPMM matches BNI's risk profile at 9.80%.
3. Apart from calculating KPMM based on minimum capital according to the risk profile, BNI also calculates additional capital as a buffer, if a financial and economic crisis occurs which could disrupt the stability of the financial system. The additional capital is in the form of:
   a. Capital Conservation Buffer of 2.5% (two point five percent) of Risk Weighted Assets (RWA).
   b. Countercyclical Buffer of 0% (zero percent) of Risk Weighted Assets (RWA).
   c. Capital Surcharge for Systemic Banks is 1.5% (one point five percent) of Risk Weighted Assets (RWA).

In terms of capital structure, until December 2024, BNI has core capital (Tier-1) of IDR142,043,039 million (bank only) and IDR147,431,803 million (consolidated) as well as supplementary capital (Tier-2) of IDR10,264,378 million (bank only) an IDR10,456,938 (consolidated) with Tier-1 CAR ratios reaching 19,96% (bank only) and 20.24% (consolidated).

As of December 31 2024, BNI has a CAR of 21.40% (bank only) and 21.67% (consolidated). BNI's total minimum CAR is at the level of 13.80%, so BNI's CAR in 2024 has met the provisions of the banking and financial services regulator.

CAPITAL STRUCTURE DETAILS

A detailed description of the capital structure is presented as follows:

Capital Structure		
Description	**2024 (Rp-billion)**	**2023 (Rp-billion)**
Core Capital (Tier 1)	142,043	130,938
Main Core Capital (CET 1)	132,386	121,699
Complementary Capital (Tier 2)	10,264	11,079
Total Capital Available	**152,307**	**142,016**
RWA for Credit Risk	660,200	609,161
RWA for Market Risk	14,162	2,812
RWA for Operational Risk	37,411	34,967
Total RWA	**711,774**	**646,939**
CAR ratio	21.40%	21.95%
Ratio CET 1	18.60%	18.81%
Ratio Tier 1	19.96%	20.24%
Ratio Tier 2	1.44%	1.71%
Minimum CAR Based on Risk Profile	9.80%	9.80%
CAR Minimum + Buffer	13.80%	13.80%

Risk Management Practices

In 2024, the financial services sector remained stable and contributed to national growth, supported by strong capital levels and high solvency, as well as a manageable risk profile amid ongoing global uncertainties as tensions in trade wars and geopolitical issues escalated and global commodity prices normalized. The global economy generally sent weakening signal, with U.S. economic data recorded lower than expectations amid persistent inflation.This has led the market to raise expectations for two (2) cuts in the Fed Fund Rate (FFR) in 2024, higher than the guidance fromThe Fed of one (1) cut.

Global geopolitical tensions were reportedly increasing in line with the high political dynamics in the U.S., as well as potential instability in the Middle East and Russia due to the escalation of the war in the Ukrainian border region.

These developments have caused both risk premiums and risk yields to increase globally. The trend prompted capital flight from emerging markets, including Indonesia, leading to weaker financial markets in most of emerging markets.

Domestically, economic performance remained stable. Core inflation was under control. with the trade balance surplus continueing, indicating that external resilience remains intact. Strong economic growth was also reflected in rising income and employment absorption. However, it remained important to note that the recovery of purchasing power was currently progressing relatively slowly.

In facing these conditions, it was important for BNI to apply an integrated risk management approach to identify, measure, monitor, and control all risk exposures. Therefore, sound risk management practices became essential in protecting capital and optimizing returns against business risks.

Within BNI, risk management practices have been aligned with business strategies that emphasize a proactive and forward-looking nature aimed at maximizing added value for all stakeholders, managing capital comprehensively, and ensuring profitability and sustainable business growth. In conducting its business activities, BNI has continued to develop innovative products and services. Supported by digital technology and reliable networks, BNI consistently implements a Risk Management process in every business and operational activity that allows BNI to mature into a sound and sustainably growing bank.

To ensure that Risk Management runs effectively, it is essential that to base its implementation on Risk Governance, which clearly governs roles and responsibilities, decision-making processes, linkages between risk management functions, and the establishment of policies that ensure that risks are managed well.

Additionally, BNI implements responsible banking practices with a focus on sustainable finance and the management of environmental, social, and governance (ESG) aspects. Each year, BNI sets targets to improve economic performance and green financing. To achieve economic performance targets, BNI undertakes digital transformation and strengthens intermediation performance in line with national recovery.

Meanwhile, in managing its green portfolio, BNI continues to strive to enhance its green portfolio and achieve environmental performance from green bonds. BNI will assess potential debtors based on their ESG management. Initial assessments of ESG aspects in the credit process are conducted in accordance with applicable policies at BNI. Under the management of the Enterprise Risk Management Division and Policy Governance, BNI manages the green portfolio and periodically evaluates credit policies and relevant ESG aspects.

As a state-owned bank that serves as a key driver in the implementation of sustainable finance in Indonesia, BNI embraces its commitment to internalize sustainability principles, including a commitment to financing sustainable activities.

BASIS FOR APPLICATION OF RISK MANAGEMENT

The implementation of BNI Risk Management is based on national and international regulations, including Law, Regulations of the Ministry of State-Owned Enterprises (BUMN), Regulations of the Lembaga Penjamin Simpanan (PLPS), Regulations of the Financial Services Authority (FSA), Bank Indonesia Regulations (PBI), and Basel Committee on Banking Documents Supervision (BCBS). Several regulations related to the Bank's Risk Management include:

1. Law of the Republic of Indonesia No. 4 of 2023 dated January 12, 2023 concerning Financial Sector Development and Strengthening
2. Law of the Republic of Indonesia No. 27 of 2022 dated October 17, 2022 concerning Personal Data Protection
3. Regulation of the Minister of State-Owned Enterprises (BUMN) No. PER-2/MBU/03/2023 dated March 3, 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises
4. Deposit Insurance Corporation (LPS) Regulation No. 2 of 2024 dated August 13, 2024 concerning Resolution Plan for Commercial Banks
5. Financial Services Authority Regulation No. 4/POJK.03/2016 dated January 26, 2016 concerning Assessment of the Health Level of Commercial Banks
6. Financial Services Authority Regulation No. 18/POJK.03/2016 dated March 16, 2016 concerning Implementation of Risk Management for Commercial Banks, as partially revoked by Financial Services Authority Regulation No. 13/POJK.03/2021 dated July 30, 2021 regarding Implementation of Commercial Bank Products
7. Financial Services Authority Regulation No. 38/POJK.03/2017 dated July 12, 2017 concerning the Implementation of Risk Management on a Consolidated Basis for Banks that Exercise Control over Subsidiaries
8. Financial Services Authority Regulation No. 17/POJK.03/2014 dated November 18, 2014 concerning the Implementation of Integrated Risk Management for Financial Conglomerates
9. Financial Services Authority Regulation No. 11/POJK.03/2016 concerning the Minimum Capital Adequacy Requirements of Commercial Banks as amended several times, most recently by Financial Services Authority Regulation No. 27 of 2022 dated December 26, 2022.
10. Financial Services Authority Regulation No. 5 of 2024 dated March 27, 2024 concerning Determination of Supervisory Status and Handling of Commercial Bank Problems
11. Financial Services Authority Regulation No. 37/POJK.03/2019 dated December 19, 2019 concerning Transparency and Publication of Bank Reports

BANK RISK MANAGEMENT POLICY

Risk is the potential loss due to the occurrence of a certain event. Risk in the banking context is a potential event, both expected and unexpected, which may cause a negative impact on the Bank's income and capital.

Risk management is a series of methodologies and procedures used to identify, measure, monitor and control risks arising from all Bank business activities, including efforts to mitigate and/or minimize financial and nonfinancial losses that may arise from Bank products or activities, the relationship between Bank with customers, other third parties and within the Bank.

The risk management policy is designed to ensure that the Bank is able to manage risks in a structured manner, reduce potential losses that could compromise financial stability, and support long-term growth.

During 2024, BNI has adequate policies, risk tolerance and risk limits which are regularly reviewed and approved by the Board of Directors and Board of Commissioners. BNI also has adequate processes for identifying, measuring, monitoring and controlling risks on an ongoing basis for all material risk factors, supported by a Risk Management Information System. The effectiveness of the implementation of the BNI Risk Management Information System includes:

1. Availability of information that is accurate, complete, informative, timely, and can be used by the Board of Commissioners, Directors and related work units in implementing Risk Management to assess, monitor and mitigate risks faced by BNI, both overall risks and per type of risk.
2. The effectiveness of implementing Risk Management includes policies, procedures and setting risk limits.
3. Effectiveness of model risk management through the Model Risk Management Framework which

includes Model Risk Assessment, Model Control Framework, Model Life Cycle Management, Model Inventory and Policy & Governance in order to minimize potential losses that occur in the process of model development, implementation and use.

4. Availability of information about the results (realization) of implementing Risk Management compared to targets set by BNI in accordance with risk management implementation policies and strategies.

Risk Management Principles

To implement effective risk management, BNI applies the following principles:

1. TIntegrated
   BNI implements risk management as an integrated activity for every part of an organization.
2. Structured and Comprehensive
   BNI implements a structured and comprehensive approach to risk management that will contribute to consistent and comparable results.
3. Customized
   BNI develops risk management frameworks and processes that are adapted to the organizational context, both internal and external, according to organizational goals.
4. Inclusive
   BNI adapts and involves stakeholders according to their knowledge, views and perceptions. This will result in awareness and informed risk management.
5. Dynamic
   Risks can arise, change or disappear according to changes in the organizational context, both internal and external. BNI has implemented risk management to anticipate, detect, accept and respond to changes and events appropriately and on time.
6. Best available information
   BNI accommodates risk management input based on historical and current information as a basis for future expectations. Risk management explicitly addresses limitations and uncertainties associated with information and expectations. BNI delivers the latest, clear and available information to relevant stakeholders.
7. Human Resources (HR) and Cultural Factors HR behavior and culture significantly influence all aspects of risk management at every level and stage.
8. Continuous Improvement
   BNI always makes continuous improvements to the risk management process through learning and experience.

Objectives of Implementing Risk Management at BNI

The implementation of Risk Management at BNI has the following objectives:

1. Manage the risks inherent in BNI's relatively complex products, activities and business activities.
2. Provide an overview to Management regarding possible losses that BNI could experience in the future.
3. Improve systematic decision-making methods and processes based on the availability of risk information.
4. Maintain and improve the assessment of BNI's Risk Profile individually, consolidated and integrated as a Financial Conglomeration.
5. Manage BNI's adequate capital structure to cover risks that may arise.
6. Provide a more accurate basis for measuring BNI's performance.
7. Create and maintain BNI's strategic position and reputation.
8. Create competitive advantages and maintain sustainable growth so as to increase BNI's shareholder value.
9. Implement risk management at BNI as a center of excellence supported by adequate competency and understanding of every aspect of risk resulting from the Bank's activities and products.

RISK MANAGEMENT FRAMEWORK

The risk management framework begins with the establishment of a risk strategy and risk appetite that is aligned with BNI's strategy and business objectives. Risk management is carried out based on the risk operating model which includes Risk Governance, Risk Management Process, Policy and Tools & Methodology. Risk management is supported by adequate Information Technology, adequate quality and quantity of human resources, and strengthening risk awareness through internalization of risk culture.

The risk management framework is depicted in the following chart:



1. **Risk Strategy and Risk Appetite**
   Risk management strategies are formulated in accordance with the overall business strategy by taking into account the level of risk to be taken (risk appetite) and risk tolerance (risk tolerance). The aim of establishing a risk management strategy is to ensure that risk exposure is managed in a controlled manner in accordance with internal policies and procedures as well as applicable laws and other provisions.

   The risk management strategy is prepared to include several principles, namely:
   a. Long term orientation to ensure BNI's business continuity.
   b. Comprehensive in nature, able to control and manage BNI risks both individually and consolidated with Subsidiary Companies and integrated within the BNI Financial Conglomeration.
   c. Fulfillment of required capital adequacy and adequate resource allocation.

   The risk management strategy is prepared with consider the following things:
   a. Economic and industrial developments and their impact on BNI's risk exposure.
   b. BNI organization, including adequacy of human resources and supporting infrastructure.
   c. Financial condition includes the ability to generate profits, and BNI's ability to manage risks that arise as a result of changes in external and internal factors.
   d. Internal portfolio mixes and diversification.

   BNI's risk management strategy includes Risk Appetite Statement and Risk Threshold Value at enterprise/corporate level which contains risk capacity, risk appetite, risk tolerance, and risk limit in a reliable and accountable manner and provides the most optimal value for BNI with the following provisions:



a. Risk Capacity
   This is the maximum risk that can be borne by the Bank based on the availability of capital, borrowing capability, liquidity and in accordance with regulatory limits.
b. Risk Appetite
   The level of risk to be taken (Risk Appetite) is the level and type of risk that the Bank is willing to take in order to achieve the Bank's objectives.
c. Risk Tolerance
   Is the maximum level and type of Risk set by the Bank. Risk Tolerance is a description of the level of Risk to be taken.
d. Risk Limit
   Is a limit to monitor that risk exposure does not deviate too much from the risk target and remains within the risk appetite and/or risk tolerance set to be carried out by the business unit.

BNI RISK APPETITE STATEMENT

The type and magnitude of risk exposure are measured using a risk measurement methodology that is linked to risk appetite, risk tolerance, predetermined limits, and capital availability and planning.

Benefits of setting a Risk Appetite Statement:
a. A clear and explicit risk appetite statement is part of the risk management implementation strategy so that risk management implementation can be more effective.
b. The existence of a risk appetite statement will provide clearer direction for all employees in making decisions, thereby encouraging consistent decision-making that is in line with the Bank's strategic targets.
c. The same understanding of all units regarding the predetermined risk appetite can increase the awareness of all units and individuals regarding risk, thereby strengthening the risk culture.
d. Risk appetite helps provide certainty and manage the expectations of the Bank's stakeholders.
e. The existence of a risk appetite will assist Management in allocating resources to the right business units (main priority) in order to obtain the expected results (expected return) in accordance with the resources invested.
f. Risk appetite will encourage each unit to improve its strategic planning by identifying risks that can be taken and risks that must be avoided.
g. The existence of a risk appetite that is aligned with the Bank's business targets is expected to encourage increased achievement of the Bank's performance (growth, efficiency, profits, increase in share prices, etc.).
h. There is harmony between strategic planning, capital management, and performance management with risk management.
i. Strengthening the internal control system.
j. Meet Regulator requirements.

BNI sets risk appetite and risk tolerance in line with the Bank's strategic objectives, which are used as a reference for the level of risk the Bank will take in achieving business objectives. BNI's Risk Appetite Statement (RAS) for 2024 is as follows:

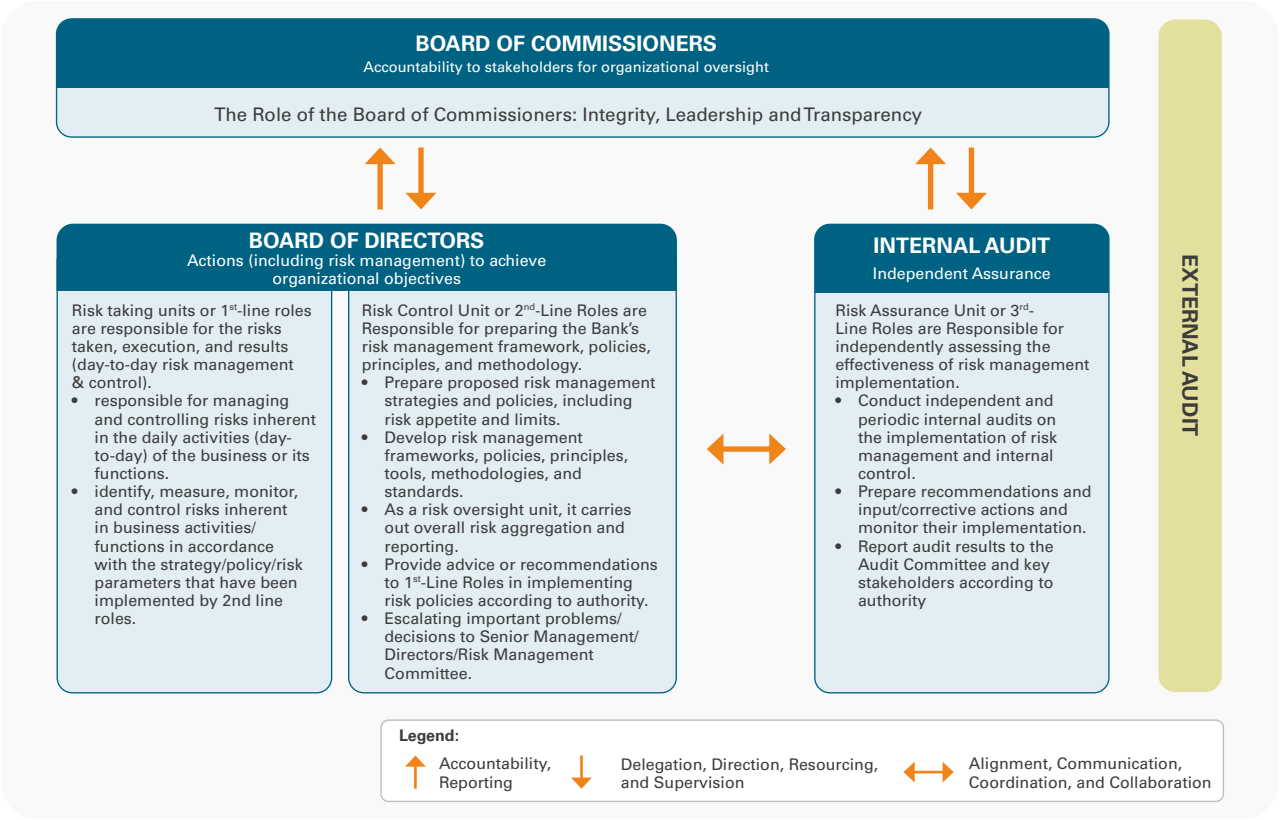
Risk Appetite	Risk Appetite Statement
Capability	Maintain capital in accordance with the level of risk and review it periodically.
Profitablity	Maintain sustainable profitability in the long term to support capital growth and bank performance
Credit Risk	a. Maintaining quality credit growth focusing on priority sectors. Providing credit to industrial sectors and high-risk business activities is carried out very carefully and selectively. b. Manage concentration risk at a level that produces optimum returns. c. Improving credit quality and effectiveness of problem credit management.
Market Risk	Maintaining the level of Market Risk in accordance with regulations while still paying attention to achieving business targets.
Liquidity Risk	Maintain liquidity availability in accordance with regulations while still paying attention to achieving business targets.
Operational Risk	a. Intolerance to internal fraud. b. Integrity is fully integrated into all decision-making and planning processes. c. The Bank has a low risk appetite for operational risk, necessitating continuous improvement in the quality of Risk Identification and Control. d. Strong risk management for the continuity of IT services. e. Maintain the implementation of IT projects according to the predetermined schedule. f. Strong Business Continuity Management (BCM) to minimize the impact of external events on human resources, services, and BNI's assets.
Legal Risk	Minimize potential losses due to legal problems in BNI business activities.
Strategic Risk	a. Generate sustainable income with controlled risk. b. Maintain capital in accordance with regulatory requirements and needs during normal and crisis times. c. Maintain sustainable business performance with controlled risk. d. Maintain the Bank's Health Level at a minimum of a Healthy rating.
Risk Compliance	Continuously minimize fines from Regulators so that they decrease over time
Reputational Risk	a. Maintaining BNI's rating remains investment grade. b. Enhance trust and positive perception through the Customer Journey to support business growth.

The governance for determining risk management strategies consist of:

a. The Risk Management Strategy is one of the bases (references) in determining the business strategy outlined in the BNI Bank Business Plan (RBB) which is determined annually and submitted to the Regulator.
b. The risk management strategy is prepared and prepared by the Risk Management Work Unit, decided by the Board of Directors through the Risk Management & Anti-Fraud Committee Meeting of the Risk Management Sub Committee and approval is sought from the Board of Commissioners.

2. Risk Governance

It regulates roles and responsibilities, interrelationships between functions, as well as the establishment of policies to ensure that risks are properly managed. In its implementation, risk management governance is implemented based on the Three Lines Model concept. The functions and roles of each line in the three lines model of risk governance are as follows:



It is essential to back the three lines model with internal control function at BNI and all Subsidiaries to ensure that the entire inherent control functions run optimally.

3. Risk Management Process



The risk management process at BNI includes identification, measurement, monitoring and control of all risks as well as disclosure of these processes.

1) Risk Identification
   Carried out proactively on all business activities in order to analyze the source, level of possibility of risk arising and the impact it causes.
2) Risk Measurement
   Carried out in order to determine the magnitude of risk exposure as a reference for carrying out control and for the purposes of calculating minimum capital requirements.
3) Risk Monitoring
   Carried out to ensure that risks are managed properly, including by:
   a) Monitoring compliance with regulations
   b) Monitoring of the risk appetite and risk tolerance that has been established
   c) Measuring the strength of BNI's capital in absorbing risks during stress conditions through stress testing calculations
   d) Risk mitigation efforts that have been carried out

4) Risk Control
Focused on risks that can be disruptive Bank business continuity. The risk control process is adjusted to the risk exposure and risk level and tolerance to be taken.
5) Submit a Risk Report (Disclosure), which includes:
a) Risk Management Report to Regulators
b) Risk Management Report to the Board of Directors
c) Risk Management Information Report to the public

4. Risk Management Policy

BNI has established a Risk Management Policies, which cover the General Risk Management Policy, the Integrated General Risk Management and Capital Policy, as well as the General Internal Control System Policy. These serve as the Company Guidelines that provide the fundamental rules for the implementation of corporate activities in managing risks and internal controls at BNI and the Financial Conglomeration, with a particular focus on risks relevant to BNI's business activities.

The Risk Management Policy is elaborated into operational Risk Management Procedures, which serve as a reference for risk management implementation for each Risk Management Unit and are adequately documented.

The Risk Management Procedures are further elaborated on as Technical Guidelines for Risk Management, which contain specific procedures related to a product and/or specific activity

The Policies, Procedures, and Technical Guidelines for Risk Management are reviewed periodically to align with regulatory changes and the Bank's business developments

5. Tools and Methodology

In implementing risk management, BNI has already in place the tools and methodologies to enhance the quality of risk management. Several tools and methodologies that have been implemented include but are not limited to:

1)	Credit Risk	:	• Internal Rating System (IRS 2.0) is an application for assessing the credit risk exposure of each debtor • RM Tools, an application to increase the efficiency of the credit process by digitizing various processes to make them more integrated so as to optimize the RM sales journey • Loan Management System (LMS) is a tool for improving end-to-end credit digitalization to simplify and speed up the debtor acquisition process, as well as strengthening the underwriting process to be more standardized with measurable risks. • Single Integrated Monitoring (SIMON) is a debtor monitoring tool as an early warning system to detect debtors with potential problems and monitor their action plans • Central Limit System, as one-stop information regarding limits and facility grade for each debtor or group • Model Risk Management (MRM) is a methodology for optimizing the validation process, increasing model life cycle efficiency, and reducing the emergence of model risks from implemented models.
2)	Market Risk	:	Kondor Global Risk (KGR) Market Risk is an application used to monitor market risk
3)	Operational Risk	:	New Periscope, which includes Risk Control Self-Assessment (RCSA), Operational Risk Event (ORE), and Business Continuity Management (BCM) modules

6. Information Technology

Risk management is supported by adequate Information Technology. BNI has sufficient Information Technology in managing the tools and methodologies of risk management. These management activities are supported by the Information Technology Work Unit (SKTI), which is responsible for providing direction and planning through the execution of all strategic Information Technology initiatives at BNI.

7. Human Resources (HR) and Risk Culture

One of the initiatives to enhance the Quality of Risk Management Implementation is through the improvement of Human Resources (HR) quality and the development of a strong risk culture. Risk culture is the collective form of values, perceptions, behaviors, and attitudes of every BNI employee towards risk and its management. The risk culture also serves as a unifying force to align all employee perceptions and perspectives to achieve the established goals. The existence of a Risk Culture significantly influences the effectiveness of risk management implementation, and ultimately, the sustainable performance of BNI.

To enhance risk culture and risk awareness, BNI has implemented several risk culture programs during 2024, including:

a. Enhancement and maintenance of Operational Risk Awareness through socialization in the form of materials such as videos, posters, Personal Computer (PC) wallpapers, bulletins, and both online and offline training conducted continuously.
b. Increasing awareness of ESG risk management through posters urging the limitation of consumption of Bottled Drinking Water (AMDK).
c. Assistance to Subsidiary Companies in implementing Risk Management, including the assessment of the Risk Maturity Index (RMI) for 2024, the adequacy of scoring methods as tools in the credit process at BNI Finance, and the Internal Model Methodology with BNI Asset Management and BNI Life.
d. Support for Risk Management Implementation at Overseas Offices (KLN), specifically Basic Risk Management Training focused on strengthening the Risk Management & Internal Control (RMIC) functions at Overseas Offices (KLN).

In addition, BNI also strengthens behavior through initiatives that bring a new spirit to enhance work culture and performance as part of the implementation of the transformation spirit to drive performance achievements through the BNI Culture Fest 2024.

IMPLEMENTATION OF INTEGRATED RISK MANAGEMENT

BNI also needs to pay attention to all risks inherent in BNI Financial Conglomeration which can affect the continuity of its business. Members of BNI Financial Conglomeration as of December 31, 2024 include BNI Finance, BNI Life, BNI Sekuritas, BNI Asset Management, BNI Securities Pte. Ltd. and hibank.

Integrated Risk Management Process

BNI, as the Main Entity together with every Financial Services Institution (LJK) member of the BNI Financial Conglomeration, is obliged to carry out a Risk Management process for each risks according to the type of risk that must be managed in an integrated manner.

1. Integrated Risk Identification

The BNI Financial Conglomerate is required to manage 10 (ten) types of risk, including: Credit Risk, Market Risk, Operational Risk, Liquidity Risk, Legal Risk, Strategic Risk, Reputation Risk, Compliance Risk, Intra-group Transaction Risk and Insurance Risk. Risk identification using complete, accurate and relevant data or information.

2. Integrated Risk Measurement

Integrated risk measurement is carried out through assessment of Integrated Risk Profiles, determination of Integrated Risk Appetite, Integrated Risk Limits and Leading Risk Indicators for all LJK members of the BNI Financial Conglomeration as well as Integrated Stress Testing.

3. Integrated Risk Monitoring

BNI, as the Main Entity, monitors Integrated Risk in the BNI Financial Conglomerate based on the results of assessments/calculations:

a. Risk Profile of each LJK member of the BNI Financial Conglomeration.
b. Integrated Risk Profile.
c. Leading Risk Indicator.
d. Integrated Risk Appetite
e. Integrated Risk Limit
f. Integrated Minimum Capital Requirement (KPMM).

In addition to conducting monitoring based on the above assessments, BNI, as the Main Entity, also actively performs On-Site Visits and Off-Site Reviews of the implementation of risk management at each Financial Services Institution (LJK). Risk monitoring is focused on significant risks and the adequacy of Risk Management tools at each member LJK of the KK BNI.

4. Integrated Risk Control

BNI as the Main Entity carries out integrated risk control, especially risks that could disrupt the business continuity of the BNI Financial Conglomerate.

Integrated risk control methods are carried out, among others, by:

a. Establish risk limits, namely:
    1) Overall Risk Limit (integrated limit of BNI Financial Conglomeration)
    2) Limit for each type of risk
    3) Risk Limit for each Financial Services Institution member of BNI Financial Conglomeration that has Risk Exposure
b. Establish appropriate risk mitigation methods.

c. Approval or escalation mechanism if the overall risk limit is exceeded.
d. Feedback/corrective action mechanism on the results of monitoring the Integrated Risk profile

Integrated Risk control methods must be reviewed periodically.

Policies and Procedures

In implementing Integrated Risk Management, BNI as the Main Entity establishes the following policies and procedures:

1. General Integrated Risk Management and Integrated Capital Policy
2. Integrated Risk Management Procedures
   Integrated Risk Management procedures include, but are not limited to:
   a. Organization, accountability and levels of delegation of authority in implementing Integrated Risk Management.
   b. Integrated Risk Appetite Procedures.
   c. Integrated Risk Limit Procedures.
   d. Integrated Risk Profiling Procedures.
   e. Intra-Group Transaction Risk Management Procedures.
   f. Integrated Capital Procedures
   g. Leading Risk Indicator procedures.
   h. New Business Line Procedures.
   i. Integrated Stress Testing Procedures
   j. Integrated Risk Culture Procedures

TYPES OF RISKS AND HOW TO MANAGE THEM

There are 8 (eight) risks managed by BNI as a Bank and 10 (ten) risks managed by BNI as a financial conglomerate, namely credit risk, market risk, liquidity risk, operational risk, legal risk, reputation risk, strategic risk, compliance risk, intra-group transaction risk, and insurance risk.

CREDIT RISK MANAGEMENT

Credit Risk is the risk of loss due to the failure of another party to fulfill its obligations to the Bank, including credit risk due to debtor failure, credit risk due to concentrated provision of funds (credit concentration risk), credit risk due to counterparty failure (counterparty credit risk), credit risk due to failure settlement (settlement risk) and credit risk due to country risk.

Credit risk can originate from various Bank business activities, such as providing loans, purchasing securities, acceptances, inter-bank transactions, trade financing transactions, exchange rate and derivative transactions, as well as commitment and contingent obligations, where lending is the largest source of credit risk.

The global economic conditions remained stable in line with the easing of pressures in the global financial markets, particularly after Trump was officially re-elected as the US President and with monetary policy easing in various major countries in response to slowing inflationary pressures.

Amidst global challenges, the domestic economy remained stable, with core inflation under control. This has had a positive impact on the performance and quality of banking credit in Indonesia and also credit performance at BNI. BNI captures this potential through various initiatives to encourage prudent credit growth with continuously improving achievements. In December 2024, BNI's credit realization was IDR761.55 trillion or grew 10.7% YoY from IDR687.91 trillion, an increased compared to growth in 2023 of 7.0% YoY.

The main driver of BNI's credit growth was the Corporate segment which recorded an increase of 20.06% YoY, followed by the Consumer business segment at 14.48%, most of which was channeled in the form of home ownership and payroll loans. To maintain asset quality, BNI's credit distribution is focused on Top Tier customers in a number of industries and continues to strive to build overall relationships with customers to ensure integrated financial solutions (close loop transactions).

BNI's credit quality continues to improve throughout 2024 and shows recovery. An encouraging trend can be seen from the gradual reduction in the gross nonperforming loan (NPL) ratio driven by the application of risk management discipline in credit distribution and monitoring. BNI's gross NPL ratio in December 2024 was recorded at 1.97%, decreased from the position at the end of 2023 of 2.1% BNI's NPL improvement was supported by improved credit quality in the Corporate segment from 0.93% to 0.70%.

The same trend occurred in the number of loans restructured. As of December 2024, BNI recorded that the amount of credit included in the restructuring was IDR66.56 trillion (bank only), decreased compared to the period at the end of 2023 which reached ID75.3 trillion. Specifically, loans that were restructured in connection with the COVID-19 pandemic also experienced improvement, which in December 2024 it was IDR7.42 trillion or 0.97% of total loans, an improvement compared to December 2023 of IDR26.6 trillion or 3.87% of total loans.

BNI also measures the Loan at Risk (LaR) ratio to describe a wider range of credit risks. LaR is the sum of loans with collectibility 1 (current) which are restructured, collectability 2 (Special Mention) and collectibility 3, 4 and 5 which are classified as Non-Performing Loan (NPL). In December 2024, BNI's total LaR reached IDR78.6 trillion or 10.3% of total credit, an improvement from the previous year of IDR89.0 trillion or 12.9% of total credit. Improvements in the LaR ratios occurred in all segments supported by a decrease in restructuring loans in line with efforts to improve the end to end credit process and also supported by BNI's policy of tightening creditworthiness analysis by utilizing big data, developing tools and early warning systems, which helped reduce the potential for future non-performing loans.

In line with the improvement in credit quality, the cost of credit ratio continues to improve, where until December 2024 it was recorded at 1.1%, down from 1.3% in 2023. Going forward, BNI will continue to control the cost of credit both in the medium and long term in the range of 1.0%. Although credit quality is relatively improving, BNI continues to anticipate a potential decline in credit quality by strengthening the coverage ratio at an adequate level. At the end of 2024, the NPL coverage ratio and LaR coverage ratio were maintained at 255.8% and 48.8%, respectively.

Currently, BNI has developed a concept and mechanism for implementing an end-to-end credit process that is more prudent, measurable with consistent and disciplined control as an effort to build a better credit risk culture, namely as follows:

1. Establish Risk Acceptance Criteria to implement aggressive, selective and quality BNI expansion. This is intended so that BNI in expanding can maintain the quality of its credit which not only includes loans for domestic businesses but also international businesses through the Foreign Office.
2. Development of tools in order to improve the quality and efficiency of the credit analysis process consisting of the development of RM Tools, Loan Management System (LMS), Credit Scoring Model for credit processes up to IDR10 billion, Internal Rating System (IRS 2.0) Application to assess the credit risk exposure of each debtor, Single Integrated Monitoring (SIMON) Framework, Credit Card Behavior and Collection, KUR Behavior and Collection, Customer Prime and Dashboard Turn Around Time Control and Monitoring. BNI also develops Central Limit System tools as one stop information related to limit and facility grade for each debtor or group.
3. Carry out the better control mechanisms to ensure that monitoring tools for debtors are implemented consistently, with discipline and quality so that BNI can determine appropriate action plans for each debtor and monitor their implementation.
4. Faster and earlier implementation of remedial action to speed up improvements in the performance of debtors with potential problems and to mitigate potential risks.
5. Conduct regular and in-depth credit training to increase credit knowledge and abilities and increase awareness.

Governance and Organization

The application of the four eyes principles in the credit process at BNI is implemented in the credit approval process carried out through the Credit Committee, which is a forum with credit decision officials who have the authority to decide on proposed credit in accordance with the specified limits. Credit Committee members consist of business unit and business risk unit officials. Business units and business risk units act as first line roles (risk owners) who are tasked with managing and controlling credit risk in the unit's daily operational activities.

BNI has made changes to the authority to decide credit related to the implementation of NWOW from an organizational aspect, one of which is by adding new functions to credit decision officials, namely Senior Business Executive (SBX) and Senior Credit Risk Executive (SCX) in the Corporate, Enterprise, Commercial Segments as well as the Remedial Recovery unit.

As an effort to accelerate credit quality improvement, BNI formed an organization for the Optimization Team for Handling LaR. The formation of this organization was carried out to monitor credit quality and handle low quality debtors more quickly and intensively which focuses on the management process, decisions, action plans and monitoring of Loan at Risk (LaR) debtors in accordance with the targets and objectives set. Apart from team organization, optimizing LaR Handling, the Remedial Recovery Unit also has a role in handling problem debtor credit. BNI carries out faster and earlier remedial actions to accelerate improvements in the performance of debtors with potential problems and to mitigate potential risks.

The Risk Management Work Unit and Policy Governance unit act as second line roles in charge of preparing credit infrastructure such as preparing credit policies and procedures, determining limits on credit decision authority, preparing rating and scoring systems, together with business units monitoring credit portfolios, as well as preparing other tools. necessary to support credit activities.

The Internal Audit Unit (IAD) as a third line role actively participates in maintaining the quality of the credit portfolio through immediate post reviews, namely carrying out checks on several debtors immediately after the credit is disbursed. IAD also carries out sampling checks on debtors to maintain the quality of debtors who have received credit facilities.

Policies and Procedures

Establishment of Credit Risk Management Policies and Procedures is aimed, among other things, at supporting healthy credit provision, identifying and handling problem loans as well as monitoring and controlling Credit Risk. Credit Policies and Procedures are prepared as a basis for carrying out activities in the credit process so that credit quality can be maintained while still paying attention to the established business targets. BNI has a Bank Credit Policy (KPB) which is decided by the Credit and Business Policy Committee Forum and approved by the Board of Commissioners. Furthermore, the KPB is translated into Credit Company Guidelines which are decided by the Credit Procedures Committee Forum (KPP).

This policy is prepared in more detailed credit procedures as guidelines that regulate end to end credit process activities so that credit quality can be maintained while still paying attention to the established business targets. Some credit procedures are Business Banking Credit Procedures for Corporate Segment, Commercial Segment, Small Segment, Credit Manual for Overseas Branch, Consumer Credit, Trade Finance, Credit Law and Credit Administration Management.

Apart from that, BNI also has a General Risk Management Policy which is derived in the form of Credit Risk Management Procedures and outlined in detail in the form of Technical Guidelines such as technical guidelines for determining Loan Exposure Limits, Credit Risk Premium, Credit Risk Stress Testing, Internal Rating Based, Scoring System, Calculation of Risk Weighted Assets, Industry Risk Rating and Credit Model Validation.

Credit policies and procedures and Credit Risk Management have been standardized into the Company Guidelines. The Company Guidelines used are currently available in the form of online guidelines, namely BNI e-PP (electronic Company Guidelines).

Risk Management Process

The credit risk management process is implemented throughout the credit process, starting from credit marketing until the credit is paid off. This process takes place continuously in a value chain activity which begins with determining strategy and planning, customer insight, portfolio planning, product development, credit processing, credit administration, intensive monitoring and portfolio optimization.

In credit operational activities within the scope of individual customers, the credit risk management process is carried out by both the Business Unit and the Business Risk Unit through the stages of identification (including verification of data correctness), measurement (use of credit analysis tools), monitoring (review of customer ratings and early warning system periodically, through visits to customers), as well as control (including through setting limits, covenants and mitigating factors).

1. Credit Risk Identification

Credit risk identification is carried out in order to analyze the sources and possibilities of credit risk that have the potential to have a negative impact on the achievement of the Bank's targets, which is carried out periodically according to the characteristics of the product and type of activity.

Credit risk identification is carried out at the transactional (individual) and portfolio levels. At the individual level, credit quality assessment is carried out based on analysis of business prospects, financial performance and debtor's ability to pay. At the portfolio level by identifying concentration risk based on idiosyncratic factors, namely factors that are specifically related to each debtor and systematic factors, namely macroeconomic factors and financial factors that can influence market performance/conditions. Credit risk identification at the portfolio level is also carried out by preparing an Industrial Risk analysis in prospective economic sectors.

2. Credit Risk Measurement

Credit risk measurement is an inseparable part and series of the process of implementing credit risk management where the Bank will calculate credit risk exposure so that it can estimate the impact of losses that may arise, where the results of the risk measurement will be used to control credit risk.

For credit processing in the wholesale segment, BNI already has a debtor rating model in the form of an Internal Rating System, while for the retail segment a debtor scoring system is used to assist in analyzing debtor quality in the credit approval process. The internal rating system is intended to enable the Bank to identify early changes in the debtor's risk profile. Currently, BNI's internal rating system is used to determine the amount of reserves that must be established. Meanwhile, for the retail segment, a scoring system is used, which includes Application score (for Griya, Non Griya, Credit Card, KUR, and Small Segment products up to IDR10 billion), Behavior score (for Credit Card and KUR products), and Collection score (for Credit Card and KUR products). Application score is used to help analyze debtor quality in the credit approval process. Behavior score is used as a monitoring tool/early warning system, dunner strategy, and tactical cross sell/up sell. Meanwhile, Collection score is used to optimize the credit collection process.

To regulate the composition of the loan portfolio, BNI has a Loan Exposure Limit (LEL) which functions to limit the risk of concentration of loan exposure based on economic sectors in each credit business segment, and serves as a guideline for business units to carry out loan expansion. To assess the risks of each type of industry, BNI has an Industry Risk Rating (IRR) and Financial Ratio Standards which are used as one of the factors in assessing the quality of debtors from an industrial perspective. In addition, BNI has also established prospective economic sectors and Industry Risk Appetite as a guideline for business units as a series of processes in pipeline management to obtain quality prospective customers.

BNI uses the Standardized Approach method for calculating Risk Weighted Assets (RWA) for Credit Risk in assessing the adequacy of fulfilling the Minimum Capital Requirement (KPMM). In order to complete the measurement system of credit risk, stress testing is carried out, namely by estimating the bank's potential losses in abnormal market conditions using certain scenarios to see the sensitivity of BNI's performance to changes in risk factors and identifying factors that have a significant impact on BNI's portfolio and capital adequacy. Credit risk stress testing is carried out periodically or can also be carried out at any time according to needs, considering economic conditions or according to the needs/requests of regulators.

BNI develops a credit risk stress testing methodology/model by considering the characteristics of the product or activity and aligning it with regulatory provisions. If the stress testing results show a vulnerability, an appropriate strategy will be implemented.

3. Credit Risk Monitoring

Credit risk monitoring is carried out on all credit risk exposures, especially those that are material in nature as well as losses that can be incurred by all functional activities. Risk monitoring aims to observe and ensure that the implementation of the entire credit risk management process is running well and that the existing potential credit risk is still within the permitted risk limits. Credit risk monitoring is carried out at the transactional (individual) level and at the portfolio level. At the individual level, among others, by monitoring the debtor's current business and financial conditions, monitoring compliance with the terms of the Credit Agreement or other transaction contracts, assessing the adequacy of collateral periodically, monitoring potential problem loans in a timely manner to take corrective action.

Monitoring credit risk at the portfolio level is carried out, among other things, through monitoring the loan portfolio, namely growth, quality and concentration of loans, monitoring loan exposure compared to the Loan Exposure Limit, as well as monitoring the Maximum Lending Limit.

In supporting the credit risk monitoring process BNI has several tools that have been implemented such as Single Integrated Monitoring (SIMON), BNIMove Monitoring Dashboard, RM Tools (Connect) and Behavior & Collection Modeling. In addition, BNI is currently developing tools to support the entire credit risk management process in the form of Loan Monitoring System (LMS) Retail and LMS Wholesale.

4. Credit Risk Control

Credit Risk Control is carried out in order to prevent deeper losses due to Credit Risk which is supported by several credit risk management tools both at the individual and portfolio exposure levels. Several ways to control Credit Risk include credit risk mitigation, determining the level of authority for credit approval, a system for early detection of problem loans, portfolio risk management, setting concentration risk targets in the Bank's Business Plan, as well as regular concentration risk analysis.

Within the scope of the entire portfolio, monitoring and reporting of credit exposure is carried out periodically to Management, including through the Loan Portfolio Report. In addition, monitoring is also carried out on credit concentration, both concentration on certain economic sectors and concentration on certain segments. Periodically in the Risk Management & Anti-Fraud Committee Forum, the Risk Management Sub-Committee (KRA-RMC) evaluates the achievement of targets, determines steps and coordinates follow-up improvements, as well as evaluates the effectiveness of the corrective steps that have been taken.

5. Credit Risk Management Information System

Credit risk management information system regarding credit portfolio, asset quality, remedial recovery, provisioning, calculation of Risk Weighted Assets for Credit Risk and Credit Risk Stress Testing.

Tools and Methods

In order to support operational business processes and credit risk management, BNI has several credit risk management tools both at the individual and portfolio exposure levels. For credit processing for individual exposures in the wholesale segment, BNI has a rating model in the form of an internal rating system where the parameters include sharpening of Environmental, Social and Governance (ESG) aspects, while for the productive retail segments up to IDR10 billion, a debtor scoring system is used for assisting in analyzing the quality of debtors in the credit process.

In addition, in order to improve the capability and quality of credit risk management implementation, BNI has improved risk management and credit processes, among others:

1. Enhancement Internal Rating Based (IRB) Model and Rating System Structure, which aims to be a solution for:
   a. Providing the best results (best return), evaluating and analyzing strategies and supporting the decision-making process by developing risk based pricing, risk based performance and portfolio management.
   b. Carrying out monitoring (tools monitoring) on the performance of Corporate, Medium and Small debtors.
   c. Calculation of CKPN is in accordance with PSAK 109.

   The benefits of enhancing the IRB Model for BNI include:
   a. Improving BNI credit quality.
   b. Assist business units in selecting prospective debtors.
   c. Becomes an early warning signal in monitoring managed debtors, thereby reducing the provisions that need to be formed.

2. Implementation of the Integrated Decision Automated System (IDEAS) which can be a tool for BNI to move more flexibly and quickly in capturing dynamic and competitive market changes, while still minimizing risk through the implementation of a credit scorecard through the use of more comprehensive customer data throughout the customer life cycles. Currently the IDEAS decision engine has been integrated with several surrounding systems at BNI, including:
   a. Consumptive eLO for BNI Griya and BNI Flexi products
   b. Productive eLO for KUR, BWU and BCM products
   c. eFORM Credit Card
   d. Common Collection – CWX Credit Card product
   e. Cardlink – core credit card system
   f. Customer behavior based on iCONS and Cardlink transactions
   g. Fleksi Mbanking Digital Loan Program

To ensure that the Bank's portfolio is not concentrated on certain debtors and economic sectors, credit restrictions have been set according to risk appetite and risk tolerance. The ERM Division has also prepared an Industry Risk Appetite (IRA) which uses consideration factors including the Industry Risk Rating (IRR), Prospective Economic Sector and Environmental Impact from the economic sector which refers to the implementation of Environmental Social and Governance principles in accordance with POJK No. 51 of 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, issuers and Companies, meanwhile, to anticipate LLL exceedances, BNI has set a house limit with a more prudent limit than the LLL limit in accordance with the Regulator's provisions.

To regulate loan portfolio concentration, BNI has a Loan Exposure Limit (LEL) which functions to limit the risk of concentration of loan exposure in each economic sector in each business segment, and serves as a guideline for loan expansion for one year. To assess industrial risk, BNI implements the Industry Risk Rating (IRR) and standard financial ratios which are used as one of the factors in assessing debtor quality from the Debtor Industrial Sector side.

As part of measuring credit risk and to anticipate changes in macro factors that influence the bank, BNI periodically carries out credit risk stress testing to assess changes in the credit portfolio and their impact on the bank as well as the bank's ability to face these conditions.

To integrate documentation in the credit process, BNI has used the e-PAK application for corporate credit which helps the end-to-end credit process along with documentation which is carried out by integrating several existing tools

Establishment of Allowance for Impairment Losses (CKPN)

The formation of BNI's Allowance for Impairment Losses (CKPN) follows the implementation of Statement of Financial Accounting Standards (PSAK) No. 109 "Financial Instruments" as an accounting standard that regulates financial instruments and is effective as of January 1, 2020. PSAK 109 requires the inclusion of information relating to past events, current conditions and estimates of future economic conditions. Projections of changes in credit losses must reflect changes in related conditions in one period. Calculation of loss recognition for future risks (Expected Credit Loss/ECL) requires forward looking estimates of Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD).

In accordance with accounting requirements, the scope of financial assets assessed for calculating Expected Loss or Allowance for Impairment Losses (CKPN) based on PSAK 109 is:

a. Financial assets that are debt instruments are measured at amortized cost or measured at fair value through other comprehensive income (FVOCI) including loans and debt securities.
b. Loan commitments issued are not measured at fair value through profit or loss or Fair Value through Profit or Loss (FVTPL).
c. Financial guarantee contracts issued that are within the scope of PSAK 109 and are not measured at FVTPL.

Calculation of impairment is carried out using 2 (two) methods, namely individual or collective impairment:

a. Individual Impairment
   According to PSAK 109, ECL for individual loans is calculated using the Discounted Cash Flow method that has considered the existing forward-looking scenarios based on 3 (three) scenarios, namely reasonable, optimistic and pessimistic economic conditions.
b. Collective Impairment Collective Impairment
   Impairment with collective methodology is applied to portfolios that do not meet the criteria of individually calculated portfolios.The collective impairment calculation uses the Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD) components.

The definition of default used in calculating the Probability of Default and Loss Given Default for credit portfolios, apart from referring to regulatory regulations regarding Asset Quality Assessment for Commercial Banks and future changes, BNI also uses the definition of default, namely the number of days in arrears of more than 90 days, internal default rating, or collectibility equal to or more than 3. For non-credit portfolios, the definition of default refers to regulatory regulations regarding the assessment of Commercial Bank Asset Quality and rating assessments published by external rating agencies. Based on the general approach to calculating impairment of PSAK 109, financial assets

are categorized into 3 (three) stages. Each stage shows the credit quality of the related financial assets, namely:

1. Stage 1: includes financial instruments that do not experience a significant increase in credit risk compared to the risk level at initial recognition or have low credit risk at the reporting date. For these assets, the ECL calculation will apply for a maximum of 12 months or according to the remaining tenor.
2. Stage 2: includes financial instruments that have experienced an increase in credit risk since initial recognition (except for credit risk at the reporting date which was relatively low) but experienced conditions or met the requirements for default. For these assets, the ECL calculation will apply throughout the remaining tenor or according to the expected remaining tenor. Lifetime ECL is the expected credit loss expected from all default events that may occur over the expected life of the financial instrument.
3. Stage 3: includes financial instruments that have been objectively proven to be impaired at the reporting date. This stage consists of debtors who experience default.

Probability of Default (PD)

Probability of Default (PD) is the main component in calculating CKPN and for assessing the potential default of a group of debtors based on productive asset quality indicators for each asset. To fulfill the rules and principles of PSAK 109, PD needs to be formed into a transition that has a time dimension known as PD forward looking.

PD forward looking will define the potential for default not limited to 1 (one) year but up to the longest tenor owned by the bank. Forward looking PD will be distributed in each year/month of facility tenor projections. This distribution is known as PD forward looking term structure.

The PD forward looking term structure required for CKPN calculations is adjusted to the stage at each facility. In generating PD values, BNI uses 3 (three) approaches based on the availability of portfolio data, namely the Vasicek Model, Bayesian Skalar Model (Internal Rating), andTransition Matrix Model.

Loss Given Default (LGD)

In calculating CKPN PSAK 109, the estimated Loss Given Default (LGD) value considers BNI recovery data from defaulted accounts. There are 2 (two) LGD segmentations, namely Secured LGD and Unsecured LGD. Secured LGD consists of an Appreciating Model, a Depreciating Model and a Static Model. For Unsecured LGD, it consists of the Discounted Debit Balance Difference Model. In the LGD calculation, there is a Recovery Secured component, which is a recovery that is met by collateral or the LGD portion of the collateral recovery which has been discounted according to the workout period. Unsecured recovery is recovery that comes from cash recovery that has been discounted according to the workout period. Direct Costs are direct costs that arise during the billing process or guarantee execution.

Collateral Recovery/Recovery Secured is divided into 3 (three) types, namely appreciated collateral, depreciated collateral and static collateral. Determining and managing/ changing rules to group collateral segmentation into the three types of collateral is carried out periodically.

For the Unsecured Recovery Rate calculation, the observed population is accounts that have experienced default but are still in default status until the end of the modelling cut off period and have a default age that exceeds the work out period limit.

Exposure at Default (EAD)

Exposure at Default (EAD) is an estimate of the carrying amount at the time of default, considering the cash flow of the related financial instrument, as well as the possibility of additional withdrawals from the credit limit up to the date of default. EAD also considers payment and amortization schedules as well as changes in the utilization of undrawn balances leading up to a default.

EAD modeling will be carried out based on the characteristics of the relevant financial instruments, which are divided into several categories, namely installment credit, revolving credit, trade finance products and treasury.

Some facilities will be subject to a credit conversion factor (CCF) rate in their EAD term structure. CCF will be imposed on facilities that have the following criteria:

1. Has a withdrawal allowance that can be used again if the principal payment is made.
2. The credit disbursement mechanism can be carried out without going through a credit risk analysis mechanism.

Expected Credit Loss (ECL)

In general, CKPN is measured by the lifetime Expected Credit Loss (ECL) value, if there has been a significant increase in credit risk since initial recognition. If at the reporting date, there has been no significant increase in credit risk since initial recognition, then the CKPN measurement of financial assets is carried out at a maximum ECL of 12 months.

MARKET RISK MANAGEMENT

Market risk is the risk on the balance sheet and administrative account positions, including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices.

As a bank, BNI is prohibited from carrying out equity (share) and commodity transactions. The application of risk management for equity and commodity risks is implemented in the case of consolidation with Subsidiary Companies. Most of the Trading Book Market Risk originates from Treasury business activities, both Domestic and Overseas, while Banking Book Market Risk, especially Interest Rate Risk in the Banking Book and Net Open Position (PDN), originates from all company activities. BNI always monitors and manages market risks wisely and continuously (sustain).

Governance and Organization

In order to manage market risk effectively and independently, Treasury business activities are divided into 3 (three) parts, namely front office, middle office and back office. The front office as a business unit strives to achieve business targets by carrying out business activities and connecting with customers. However, as part of the internal control system, the front office also functions as a first line role which will attempt to limit and anticipate market risks caused by changes in exchange rates and interest rates according to predetermined limits. In carrying out its activities, the Treasury business is limited by the Risk Appetite and Risk Limit proposed by the Enterprise Risk Management Division to the Risk Management & Anti-Fraud Committee, Risk Management Sub-Committee (KRARMC). Treasury transaction limits are proposed by the Policy Governance Division through the Credit and Business Policy Committee, while counterparty limits are determined by the Business Risk Unit.

The Enterprise Risk Management Division as a second line role carries out the function of monitoring market risk and compliance with risk limits, including market risk limits, authority limits and counterparty limits, validating fixing prices, checking the fairness of prices for treasury transactions and investigating off market occurrences and reviewing them. use limits. In addition, to complement the existing market risk management function, BNI also has a Middle Office function which is tasked with monitoring, controlling and reporting risks in Treasury transactions.

The back-office function is in the Banking Operations Division, namely carrying out confirmation, bookkeeping and settlement activities for Treasury transactions.

Policies and Procedures

In order to support business targets while still paying attention to the principle of prudence, BNI has a Company Guide for Treasury and International Business. In addition, in order to manage Market Risk effectively, BNI is guided by the Company's Market Risk Management Guidelines. The Company Guidelines contain procedures and methodologies as well as market risk management models, which are prepared and reviewed and validated periodically by the Enterprise Risk Management Division.

Risk Management Process

Identification, measurement, monitoring and control of market risks are carried out by units that are independent from the business units.

1. Market Risk Identification
   BNI carried out risk identification tailored to the market risk inherent in the Bank's business activities. The objectives of Market Risk Identification are:
   a. Determining transactions/products exposed to Market Risk
   b. Classify Market Risk based on existing criteria
   c. Facilitate the measurement of Market Risk and its control

2. Market Risk Measurement
   Periodic Market Risk measurement is carried out on all trading book and banking book portfolios exposed to Market Risk. BNI conducts Market Risk measurement using Standard Method in accordance with POJK No. 23/SEOJK.02/2022 and Internal Method. The Standard Method is used to calculate Market Risk Minimum Capital Adequacy (CAR), while daily market risk management uses the Internal Method (Value at Risk) and sensitivity (DV01) for securities.

   The portfolio coverage calculated in KPMM using the Standard Method is the trading book portfolio for interest rate risk and the trading book and banking book portfolio for exchange rate risk for both Domestic and Overseas Office portfolios.

For internal purposes, BNI has also carried out calculations using the Internal Method, calculating Value at Risk (VaR), which is a value that describes the maximum potential for losses experienced by the Bank as a result of market movements that influence the Bank's risk exposure under normal market conditions.

Domestic and Foreign Office market risk exposure (Value at Risk) is always monitored on a daily basis and submitted to Management on a weekly and monthly basis. The price valuation policy currently used for actively traded instruments is mark-to-market, while the valuation method for less actively traded instruments uses fair prices from independent sources.

Interest Rate Risk in the Banking Book (IRRBB) is a risk resulting from movements in interest rates in the market that are contrary to the position of the Banking Book, which has the potential to have an impact on the Bank's capital and income both now and in the future.

3. Market Risk Monitoring
   The Market Risk monitoring and reporting process is carried out periodically, including:
   a. Monitoring and reporting on the magnitude of Market Risk for all Bank portfolios exposed to Market Risk.
   b. Monitoring and reporting on Market Risk limit compliance (realized Market Risk exposure compared to the limit).
   c. Follow-up recommendations for exceeding limits and/or abnormal market conditions, and/or other conditions that lead to an increase in potential Market Risk.

   The development of risks in the banking book portfolio as a whole is closely monitored periodically in accordance with the measurement method determined by the regulator, namely monitoring the Net Open Position (PDN) for exchange rate risk and interest rate risk in the banking book gap, and is conveyed to management through the Risk Management Committee Forum and Anti Fraud Risk Management Sub Committee.

4. Market Risk Control
   Market Risk Control is carried out in order to prevent deeper losses due to Market Risk through the establishment of market risk limits in the Treasury Division and Overseas Offices, among others, as follows:
   a. Value at Risk Limit (VaR Limit), which is the maximum potential loss that may occur at a certain time in the future with a certain level of confidence.
   b. Stress Value at Risk Limit (SVaR Limit), which is a measurement of market risk adjusted to abnormal conditions in the market or the maximum potential loss when the market is abnormal.
   c. Budget Loss Limit which is used to limit the realization of losses from business activities.
   d. Management Action Trigger (MAT), namely the limit for taking action against the risk of changes in value that are detrimental (early warning signal). MAT completes the loss limit budget in the form of a certain percentage of the loss limit budget.
   e. Securities purchase limits are used to limit the concentration of corporate securities purchases based on the rating and type of securities currency.
   f. Limit Interest Rate Risk in Banking Book (IRRBB) uses the Net Interest Income (NII) method and the Economic Value of Equity (EVE) approach to limit interest rate risk in the banking book.
   g. Nominal open position limit, namely the maximum nominal open position limit that a dealer can make.
   h. Dollar Value of 1 Basis Point (DV01) limit, to complement the nominal open position limit, a DV01 limit is established, which is a limit on the sensitivity of securities prices to changes in interest rates.
   i. Delta option limit, is a limit on the sensitivity of options prices to the price of the underlying asset.
   j. Overall internal PDN limit (absolute), namely the maximum limit of PDN management.

5. Market Risk Management Information System
   The market risk management information system is used to support the processes of identifying, measuring, monitoring, and controlling market risks. The Market Risk Management Information System is built by periodically quantifying market risk exposures. The quantification process is run in the form of reports on market risk exposure, which cover comparisons between market risk parameters and limits, calculations of Risk-Weighted Assets (RWA) for market risk, and market risk stress testing, which are prepared as daily, weekly, and monthly reports.

Tools and Methods

In order to increase market risk capabilities, monitoring support tools have been developed that can improve the quality and accuracy of monitoring results, including the following:

a. In accordance with regulatory provisions, BNI measures the impact of changes in interest rates in the Banking Book (Interest Rate Risk in the Banking Book/IRRBB). The calculation method is carried out using 2 (two) approaches, namely the Net Interest Income (NII) method and the Economic Value of Equity (EVE) method. BNI carried out an interest rate shock simulation with 6 (six) scenarios according to Basel and looked at the impact on BNI's profitability and capital. By considering the complexity of the data, products and models used, an IRRBB calculation application has now been developed so that the results obtained are expected to be more accurate.
b. The Off Market Price Limit monitoring application is an application to monitor the fairness of transaction prices (likely and reasonable), namely in accordance with the range of daily fluctuations in market rates/prices (expected daily fluctuations possible) at that time.
c. The transaction authority limit monitoring application is an application for monitoring Transaction Limit (Deal Ticket Size), Position Limit, and Stop Loss Limit (Budget Loss Limit).
d. Credit Counterparty Limit monitoring application where there is development of Forex Counterparty Limit calculations using the Credit Conversion Factor (FKK).
e. The Value at Risk (VaR) monitoring application for (HO) and Overseas Offices (KLN).

Meanwhile, market data is obtained from Reuters, Bloomberg and other independent sources.

Steps to strengthen market risk management in order to face changes in economic conditions throughout 2024 include actively monitoring movements in market factors that have the potential to impact the Bank. The Bank monitors market indicators through the Early Warning System for the Forex portfolio and the Early Warning System for Interest Rate tools.

To determine the potential impact of changes in internal and external conditions on the bank, Scenario Analysis and Stress Testing have been carried out periodically and incidentally. Periodic Stress Testing uses scenarios that refer to Regulatory provisions and the Bank's internal scenarios. Incidental Stress Testing Scenarios and Scenario Analysis adjust the conditions of macroeconomic factors and market factors at that time. Each Foreign Office also carries out Stress Testing in accordance with internal regulations and local Regulatory regulations. The results of the stress testing are used to prepare a Contingency Plan so that risks that occur can still be mitigated and managed well.

LIQUIDITY RISK MANAGEMENT

Liquidity risk is the risk resulting from the inability to meet maturing obligations from cash flow funding sources and/ or from high quality liquid assets.

Liquidity risk is related to the possibility that the Bank will not be able to fulfill short-term obligations to depositors, investors and creditors, as well as fulfilling minimum statutory reserves, which is due, among other things, to limited access to funding or the inability to liquidate owned assets at a reasonable price.

Liquidity risk management aims to minimize the possibility of the Bank's inability to obtain cash flow funding sources, and build the structural liquidity strength of the Bank's balance sheet to support sustainable long-term growth.

BNI Liquidity Risk can occur due to the inability to obtain cash flow funding sources caused by:

1. Inability to generate cash flows from productive assets or from sales of assets, including liquid assets.
2. Inability to generate cash flow originating from raising funds, inter-bank transactions and loans received.

Governance and Organization

Liquidity Risk Management is carried out by the Enterprise Risk Management (ERM) Division, Treasury Division (TRS), and Overseas Office. Liquidity Risk Management Policies and Procedures are prepared by the ERM Division, then implemented by the Treasury Division and all Overseas Offices which are realized in liquidity strategy management. The ERM Division also monitors the implementation of liquidity management carried out by the Treasury Division.

Policies and Procedures

BNI has developed a Risk Management General Policy which is further elaborated into Liquidity Risk Management Procedures which contain guidelines for the implementation of liquidity risk management, among others in the form of:

1. Availability of Liquid Assets: Cash, Minimum Statutory Reserve (GWM), Secondary Reserve, Tertiary Reserve, Early Warning Indicators, Liquidity Contingency Plan Head Office and Overseas Office.
2. Liquidity Risk Measurement: Cash Flow Projection Liquidity Ratio, Maturity Profile, Liquidity Adequacy Ratio, Stress testing.
3. Calculation of Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR)
4. Monitoring Liquidity Risk.
5. Liquidity Risk Control.
6. Determination of Liquidity Limits: Regional and Bank Cash Ceilings Wide, Safety Level limits, Maturity Profile Limits and Foreign Exchange Credit Limits based on the availability of Foreign Exchange liquidity.

Risk Management Process

Liquidity risk management aims to minimize the possibility of the Bank's inability to obtain cash flow funding sources, and build the structural liquidity strength of the bank's balance sheet to support sustainable long-term growth.

1. Liquidity Risk Identification
   Liquidity Risk Identification is the process of obtaining and analyzing sources of liquidity risk inherent in all business activities/transactions/ products that can have a financial impact on the Bank. Each activity/product/ transaction is analyzed and differentiated to ensure that each liquidity risk has been identified, measured accurately, managed according to appropriate methods, and controlled properly.

2. Liquidity Risk Measurement
   Liquidity Risk Measurement Methods include liquidity ratios including Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR), maturity profiles, cash flow projections, stress testing and the process of monitoring and/or reporting Liquidity Risk carried out periodically, including:
   a. Monitoring and reporting the magnitude of Liquidity Risk for all Bank activities/products that are exposed to Liquidity Risk;
   b. Monitoring and reporting on compliance with Liquidity Risk limits (realization of Liquidity Risk exposure compared to the limit);
   c. Monitoring early warning indicators (internal and external) to identify potential increases in Liquidity Risk; And
   d. Follow-up recommendations for limit exceedances and/or abnormal market conditions, and/or other conditions that lead to an increase in potential Liquidity Risk.

3. Liquidity Risk Monitoring
   In managing liquidity, apart from managing primary reserves (cash and GWM), BNI keeps and maintains secondary reserves to ensure liquidity is at a safe level. As a secondary reserve, BNI maintains and maintains tertiary reserves. Determination and monitoring of limits, namely BNI Wide Cash Ceiling limits, Safety Level limits, Maturity Profile limits, and Foreign Currency Credit limits based on Fund Availability are carried out periodically by the ERM Division. Determination and monitoring of limits are carried out periodically, including:
   a. BNI Wide Cash Ceiling Limit which is the maximum limit for maintaining a total BNI Rupiah cash balance consisting of Branch/ Central Cash and Other Cash (ATM Replenish Cash, ATM Cash and CRM Cash).
   b. Limit Safety Level is the minimum amount of Secondary Reserve that must be maintained to anticipate TPF withdrawals based on the volatility of each type of DPK and the volatility of loan disponibles with a certain level of confidence.
   c. Maturity Profile Limit is the cumulative behavioral maturity gap limit up to 1 month. This limit is a condition on the Rupiah maturity profile limit and the foreign exchange maturity profile limit.
   d. Restrictions on Foreign Currency Credit based on the Availability of Foreign Currency Liquidity are a mechanism for controlling the maximum amount of foreign currency funds that can be channeled to provide onshore loans, offshore loans and local loans originating from conventional and non-conventional funding sources, as well as a liquidity risk mitigation mechanism based on the availability of funds and not is the credit risk limit. Meanwhile, the availability of all reserves is monitored daily, weekly and monthly by the TRS Division and ERM Division.

4. Liquidity Risk Controlling
   Liquidity risk control is carried out in order to prevent deeper losses due to liquidity risk, which is done by setting limits on liquidity risk monitoring. Determination and monitoring of limits are carried out periodically, including:
   a. BNI Wide Cash Limit, reviewed semi-annually.

b. Limit Safety Level which determines the minimum limit of liquidity reserves that the Bank needs to haveand applied according to current liquidity conditions (normal/moderate/tight).
c. Maturity Profile Limits, which consist of Rupiah maturity profile limits and foreign currency maturity profile limits.

5. Liquidity Risk Management Information System
The liquidity risk management information system is used to support the implementation of processes of identifying, measuring, monitoring, and controlling liquidity risk. This information system provides information related to liquidity risk under both normal and crisis conditions in the form of daily, weekly, and monthly reports. The liquidity risk management information system covers comparisons between liquidity parameters against limits and Liquidity Risk Stress Testing.

Tools and Methods

In managing liquidity risk, BNI uses daily cash flow projections and monthly maturity profiles, both contractually and behaviorally, in order to determine appropriate and accurate strategies to anticipate the bank's liquidity conditions in the future.

Liquidity Early Warning Signal (EWS)

Early warning indicators are described in internal and external indicators for normal conditions, moderate conditions or tight conditions for both Rupiah and foreign currency. Internal indicators used include trends in customer funds, dominant customer concentration, and bank liquidity ratios. External indicators used include interest rate trends BI Rate, INDONIA, SOFR TERM, Outstanding Liquidity in the Market (Market Net Liquidity) and Fed Fund Rate (FFR).

Determining bank liquidity in Normal, Moderate or Tight conditions is a reference in determining the Safety Level (liquidity reserve limit) that must be provided by the bank. Furthermore, the determination of liquidity conditions will become a guide in the Liquidity Contingency Plan (LCP), namely a set of guidelines in tight liquidity conditions which include but are not limited to alternative strategic steps.

Liquidity Stress Testing

To determine liquidity resilience in crisis periods, liquidity stress testing has been carried out periodically. Stress testing scenarios are carried out using bank-specific scenarios (Idiosyncratic Scenario) and market stress scenarios (Market Wide Scenario). A specific scenario for banks (Idiosyncratic Scenario) uses the assumption that the bank is in liquidity difficulties due to loss of investor/depositor confidence in the bank.

Meanwhile, the market stress scenario (Market Wide Scenario) uses the assumption that there will be disruption to the market/financial system as a whole which will result in disruption to bank operations.

The results of stress testing from this scenario will be used for a liquidity funding plan so that risks that occur can still be mitigated and managed well.

Liquidity Adequacy Ratio

In order to increase short-term liquidity resilience, BNI manages the Liquidity Coverage Ratio (LCR) by maintaining sufficient High-Quality Liquid Assets (HQLA) to meet liquidity needs over the next 30 (thirty) day period in a stress scenario, in such a way that the bank can maintain the liquidity adequacy ratio always above 100% both individually (bank only) and consolidated with Subsidiaries. Apart from the LCR ratio, to manage long-term liquidity resilience, BNI also manages the Net Stable Funding Ratio (NSFR) ratio by maintaining stable funds to fund stable assets. BNI maintains an NSFR ratio above 100% for individual and consolidated positions with subsidiaries

OPERATIONAL RISK MANAGEMENT

Operational Risk occurs due to inadequacy or ineffective internal processes, human error, system failure, or external disturbances that affect the Bank's operations. Operational Risk Events are risk events that are inherent in every business and operational process carried out by the Bank that may trigger further risks such as Reputation Risk, Legal Risk, Compliance Risk and other risks if not managed properly.

Policies and Procedures

In order to implement operational risk management, BNI refers to the regulations of the Financial Services Authority, Bank Indonesia, and International Best Practices. BNI also has operational risk management procedures that are developed and evaluated periodically to offer guidelines for all work units in implementing the Bank's agreed operational risk management framework. The Operational Risk

Management Strategy is formulated in accordance with the overall business strategy and objectives with due consideration of the level of risk risk appetite and risk tolerance.

Governance and Organization

The governance of operational risk management is implemented based on the Three Lines Model, which separates Operational Work Units (Risk Taking Unit) as the Risk and Control Owner from independent Risk Management Work Unit and the Internal Audit Work Unit. The Operational Work Unit, in the context of operational risk, partners with the Senior Operational Risk Executive (SORX) to mitigate risks faced in their respective coverage areas or sectors. The Risk Management Work Unit is responsible for monitoring risks and providing policies/procedures related to risk management as well as reviewing new bank products. The Internal Audit Work Unit is tasked with ensuring the effectiveness of risk management and internal controls.

Risk Management Process

BNI conducts a Risk Control Self-Assessment (RCSA) process, which is an identification, measurement, monitoring, and control process for operational risks carried out periodically through self-assessment by all work units, aimed at identifying potential control weaknesses so that risks can be mitigated as early as possible. In the risk identification process, an operational risk taxonomy has been established as a reference for mapping all existing risks, making identification more granular and enabling more focused follow-up and prioritization.

The RCSA process, using the Process, Risk, Control, and Monitoring (PRCM) approach, serves as the basis for Control Testing (CT) by SORX to identify the Control Improvement Plan (CIP) or necessary control improvements. In addition to being sourced from RCSA activities, CIP can also arise from follow-up on operational risk events and other identification processes. This aims to ensure that control improvements and enhancements are carried out continuously and reflect a strong risk culture.

Regarding operational risk events, BNI establishes mechanisms for identifying operational risk events, recording, reporting, and analyzing existing events through the Operational Risk Event (ORE) Management procedure. ORE serves as a means to analyze root causes and develop necessary follow-up actions through preventive measures and required remediation actions. Additionally, BNI has an operational risk reporting mechanism used as a consideration in making strategic decisions and escalated to Management, providing them with timely information on operational risk events along with follow-up actions.

In calculating the Minimum Capital for Operational Risk and Risk-Weighted Assets (RWA) for Operational Risk, BNI uses the Standard Approach in accordance with the regulations from the Financial Services Authority (OJK), which is used as one of the elements in measuring capital adequacy (Capital Adequacy Ratio).

The operational risk management process requires organizational support with a clear understanding of tasks and responsibilities comprehensively understood by all work units. Check & Balance occurs within the organization so that the operational risk management process can proceed as planned.

The use and application of information technology can support the operational risk management process, where the complexity of the bank, process automation, and control process automation can maximize risk mitigation efforts. Additionally, integrated data for operational risk can produce complete and accurate information that can be used in operational risk management and as supporting data in decision-making by management. To meet these needs, BNI has developed an Operational Risk Management System (ORMS) named New PERISKOP (Operational Risk Device).

The most important and fundamental foundation in operational risk management at BNI is a strong risk culture, appropriate employee behavior regarding risk & control, and the right mindset towards risk management. With these aspects fulfilled, the risk management process can operate effectively, where the frontline facing risks can optimally mitigate risks, complemented by other methodologies, ensuring that risk management efforts are maximally beneficial. Efforts to enhance the operational risk culture are carried out through various risk awareness programs delivered consistently, continuously, and focused through various media such as bulletins, posters, PC wallpapers, videos, etc.

BUSINESS CONTINUITY MANAGEMENT

Disruptions or disasters caused by natural factors, human actions, or system disruptions can occur in critical BNI business functions causing disruption to BNI business activities and services.To anticipate this incident, BNI has implemented Business Continuity Management (BCM) in all units both at home and abroad, which is expected to minimize operational risks in the event of an emergency or disaster.

The implementation of this policy is in line with Regulatory regulations which require Banks to implement risk control processes that could endanger the Bank's business continuity, and is in line with the requirements in the Basel II document which requires Banks to have business continuity management and emergency plans (Business Continuity Management and Contingency Plan). For Overseas Offices, BCM is implemented in accordance with BCM regulations in the local country.

Policies and procedures as part of governance regulate the processes within BCM, from the assessment of potential risks and threats (Threat Risk Assessment - TRA), identifying critical business processes (Business Impact Analysis - BIA) for the continuity of BNI's business, creating emergency response plans (Emergency Response Plan - ERP), to developing Recovery Strategies. The governance of BCM also ensures that testing and simulation processes of BCM from critical units are conducted regularly, ensuring that each unit can evaluate the established plans, improve them, and enhance readiness in facing crisis or disaster conditions.

BNI has also established a BCM Framework, which includes an organizational structure where the Crisis Management Team (CMT) is formed based on potential crisis scenarios that may occur. BNI's CMT consists of a combination of work units that operate according to their expertise in handling relevant crises, making crisis management efforts more effective.

DIGITAL RISK MANAGEMENT

In line with the development of banking business innovation that prioritizes platform-based and fully digital through the development of advanced digital capabilities with data-based business models, the Bank is strengthening risk management, especially related to digital risks, as well as increasing cyber resilience through strengthening cyber security. Standards for implementing digital risk management and cyber security are also equipped with robustness and cyber security testing, and are supported by effective reporting on the implementation of digital risk management and cyber security so as to create effective, efficient and safe services.

Governance and Policy

Digital risk management and cyber security strategies are implemented within an effective and comprehensive governance corridor, thereby creating risk management that is proactive and forward looking. The implementation of risk management governance at BNI is carried out through the General Risk Management Policy (KUMR), framework and procedures which are applied consistently and continuously in accordance with regulatory provisions. Implementation of risk management governance based on People, Process and Technology, is the main foundation for implementing digital risk management and cyber security for the Bank in meeting customer expectations, stakeholders and regulators. Digital risk management is carried out on 8 (eight) digital risk classifications, namely:

1. Cybersecurity Risk is the risk of cyber-attack threats to digital business, identification and response to cyber incidents.
2. Data Privacy Risk is the risk due to the limitations of information security for activities of use, processing, storage, transmission, as well as potential privacy violations and data leakage.
3. Third Party Digital Risk is the risk of cyber vulnerabilities and weaknesses in information security due to the cooperation of third parties and external parties who have access to the Bank's infrastructure or data.
4. Workforce Risk is the risk caused by the lack of IT & Digital skills of employees as well as employees/vendors/outsources who work any device, any place, any time for privacy, compliance to authentication, access, and others.
5. Process Automation Risk is the risk of digital automation process on the development of digital transformation.
6. Resiliency Risk is the risk of resilience in operations and infrastructure when growing increasingly digital.
7. Compliance Risk is the risk of non-compliance with regulatory changes, unavailability of provisions, or failure to implement applicable standards/regulations from the implementation of digital-based business models.

8. Cloud Related Risk is the risk of cloud-based security, by maintaining visibility of the security of the use of cloud services and security of the Cloud Service Provider (CSP)

Risk Management Process

In managing digital and cyber risks, BNI implements comprehensive risk management to identify, assess, measure, monitor, and control digital business risks, including analysis and identification of risks inherent in digital services, as well as security controls to mitigate risks and ensure compliance with principles of confidentiality, integrity, authenticity, availability, and non-repudiation. The elaboration of the digital risk management process is as follows:

1. Digital Risk Identification
   Risk identification is conducted proactively across all digital activities, processes, and products by:
   a. Identifying at-risk assets, including information assets, systems, human resources, and company frameworks/guidelines.
   b. Identifying sources of threats.
   c. Identifying vulnerabilities.
   d. Assessing the severity of existing vulnerabilities.

   Digital risk identification is performed across all Bank environments and at all stages of development, production, maintenance, and ad-hoc conditions of digital services.

2. Digital Risk Measurement
   Risk measurement is conducted to understand the development and extent of digital risk exposure as a reference for control. Identified risks are measured and mapped according to the likelihood and impact associated with digital risks, followed by the implementation of controls, including preventive, deterrent, detective, corrective, and compensating controls.

3. Digital Risk Monitoring
   Risk monitoring is performed to ensure that risks are well managed, including monitoring the performance of digital services through log monitoring, Security Operation Center (SOC), vulnerability assessments, penetration testing, threat intelligence, cyber resiliency testing, thematic reviews, and others.

4. Digital Risk Control
   Digital risk control is conducted to manage residual risks, referring to established policies and procedures, risk limits, and implemented risk controls. In digital risk control, risk control strategies include strengthening risk controls such as enhancing security solutions, managing information technology assets, access management, and others.

The Bank's digital risk management is implemented through collaboration between the first line and second line, as well as the third line as evaluators and reviewers of risk management implementation. In its implementation, the Bank also has several programs to strengthen digital risk management and cybersecurity, including:

1. Digital Product Risk Assessment: This assessment process aims to identify risks associated with information technology and digital products before they are implemented/enhanced/changed. This process includes security assessments, compliance, and operational impact of new/existing products or technologies to reduce potential risks and ensure that digital products meet established standards, including BNI's major innovation in 2024, namely the launch of wondr by BNI and the BNI Corporate Portal.
2. Thematic Review: This activity involves comprehensive vulnerability analysis by the second line through black box testing in the Bank's production environment, simulating real attacks to identify weaknesses that have not been detected by the methods employed by the first line.
3. Cyber Resiliency Testing: This serves as a monitoring capability and maturity assessment of the Bank's people, processes, and technology in prevention, detection, and remediation, which can be conducted through programs such as Table-Top Exercises, Computer Security Incident Response Team (CSIRT), Social Engineering Technique Program (SETP), and others.
4. Digital Risk Research & Development: This is a process of research and development of methods in digital risk management, including threat trend analysis, development of tools and techniques for risk mitigation, and innovation in the digital risk management process.

These digital risk management strengthening programs are conducted continuously, resulting in an effective, rapid, and efficient risk response.

LEGAL RISK MANAGEMENT

Legal risk is a risk resulting from lawsuits and/or weaknesses in juridical aspects. BNI's legal risks can originate, among other things, from weaknesses in the juridical aspects caused by weak engagements carried out by BNI, the absence and/or changes in statutory regulations which cause a transaction carried out by BNI to be not in accordance with the provisions, and the litigation process arising from a lawsuit. third parties to BNI and BNI to third parties.

Governance and Organization

Legal risk management is carried out by the Legal Division under the active supervision of the Director of Human Capital & Compliance. In managing legal risk, the Legal Division collaborates with the Legal Management Unit or staff who handle legal functions in Divisions/Units/Regional Offices or other organizational units where the Legal Sector Work Unit functions as a 'legal watch', which provides legal analysis/advice to organizational units and/or employees at every level of the organization to minimize the possibility of negative impacts from weaknesses in juridical aspects, absence and/or changes in statutory regulations and litigation processes. In managing legal risk, the Legal Division collaborates with the Enterprise Risk Management Division in regularly assessing and monitoring the implementation of Legal Risk Management.

Policies and Procedures

Implementation of legal risk management refers to the Company's Legal Risk Management Guidelines and other policies related to legal risk management. In order to stipulate the appropriate Legal Risk Management policies, the Legal Division and Enterprise Risk Management Division evaluate and update Legal Risk control policies and procedures periodically, in accordance with developments in applicable regulations and legislation.

Risk Management Process

In carrying out the Legal Risk control function, BNI implements legal risk management policies in a process flow consisting of:

1. Legal Risk Identification
   Legal risk identification is carried out regularly and continuously. The legal risk identification process is carried out by analyzing all sources of legal risk, which at least includes legal risks from BNI products and business activities as well as legal risks from new products and activities through an appropriate legal risk management control process before they are introduced or implemented. The process of identifying legal risks inherent in the Bank is carried out using indicators/parameters:
   a. Litigation factor, in the form of estimated losses due to litigation compared to the Bank's capital.
   b. Engagement Weakness Factor, in the form of scoring the results of the review of Non-Standard Agreements and Standard Agreements.
   c. Absence/Change of Legislation Factor, in the form of percentage of BNI products that have not been expressly regulated and have high complexity/number of BNI products.

2. Legal Risk Measurement
   Legal risk measurement is carried out using comparison parameters between the nominal claim from a third party against BNI's capital, indicators of litigation factors, weak engagement factors and factors of absence or changes in legislation in identifying Legal Risk. The results of the Legal Risk measurement are reflected in the Legal Risk Profile.

   As part of the legal risk measurement, the indicators/parameters as well as the amount of weight and ratio used to measure the legal risk profile are determined by the Legal Division, taking into account input from the Board of Directors, Enterprise Risk Management Division and other units as well as regulatory requirements. Legal risk profile parameters consist of Inherent Risk and Quality of Risk Management Implementation (KPMR). The results of Legal Risk measurement are reflected in the Legal Risk Profile.

3. Legal Risk Monitoring
   Legal risk monitoring is carried out by evaluating the inherent legal risk exposure, especially those that are material or have an impact on BNI's capital.

   Legal Risk Monitoring includes:
   a. Litigation Factors: Supervising and/or handling criminal and civil cases.

b. Obligation Weakness Factors: Coordinating with relevant business units in the preparation of cooperation agreements to ensure they meet business needs and product regulations while protecting BNI's interests.
c. Lack/Change of Legislation Factors: Coordinating with relevant business units to ensure the completeness of documentation so that BNI's interests are protected and maintaining the Service Level Agreement (SLA) regarding the implementation of each BNI product/activity.

The results of the monitoring, which include evaluations of legal risk exposure, are compiled into a Legal Risk Management Information System (SIM Legal Risk) that provides periodic reports on legal risk exposure (monthly, quarterly, and annually), including necessary follow-up actions.

4. Legal Risk Control
Legal risk control is carried out especially for activities that could endanger BNI's business continuity.

The legal risk control process is carried out, among other things, by:
a. Carry out assessments in the form of juridical studies in the event that there are new bank products or there are additions/changes to features of BNI products.
b. Providing legal advice and/or legal assistance in the event that there are legal risks in operational activities.
c. Conduct regular reviews of standard agreement formats, especially credit agreements, to ensure compliance with applicable laws and regulations and other provisions.
d. Conduct regular reviews of contracts and agreements between BNI and other parties, among others by scoring the contracts and agreements.
e. Carry out intensive monitoring of legal issues, especially lawsuits based on Unlawful Acts involving the Bank as a Defendant or Co-Defendant.
f. In conducting transactions through the issuance of guarantees such as bank guarantees and pledge agreements, the Bank has prepared sample document formats that offer business units reference in making compliant transactions.
g. The Legal Division provides training or outreach related to legal issue mitigation to units within BNI to enhance understanding/ legal risk awareness.

5. Legal Risk Management Information System
The legal risk management information system is used to support the processes of identifying, measuring, monitoring, and controlling legal risks. The legal risk management information system owned by BNI includes the availability of information for:
a. Periodic reports submitted along with the risk profile provided regularly, including:
   1) Data on potential losses.
   2) Legal reviews, results of standard and non-standard agreement reviews.
   3) Absence/change of legislation regarding new Bank products/activities and their amendments.
b. Incidental reports:
   1) Active Case List Report.
   2) Case Reports to the Board of Directors and/or Board of Commissioners.

STRATEGIC RISK MANAGEMENT

Strategic Risk is the risk resulting from inaccuracy in making and/or implementing a strategic decision as well as failure to anticipate changes in the business environment. BNI's strategic risks can originate from weaknesses in the strategy formulation process and inaccuracies in strategy formulation, inadequate management information systems, inaccurate results of internal and external environmental analysis, overly aggressive strategic goal setting, inaccuracies in strategy implementation, and failure to anticipate changes, business environment. including failures to anticipate technological changes, shifts in macroeconomic conditions, competitive dynamics in the market, and changes in related regulatory policies.

Strategic Risk Management is divided into 2 (two) categories, namely:
1. Based on Time Frame: Strategic planning is divided into:
   a. Long-Term Plan: BNI's planning system with an implementation period of 5 (five) years.
   b. Short-Term Plan: BNI's planning system with an implementation period of 1 (one) year to 3 (three) years.

2. Based on Scope: Strategic planning is divided into:
   a. Bank-Wide Plan: Planning that applies to and binds the entire organization within the company.
   b. Division/Unit/Branch Office Plan: Planning that is limited to the relevant unit.

Governance and Organization

Strategic Risk Management is carried out by the Corporate Planning & Performance Management Division, under the active supervision of the Finance Director.

Strategic Risk Management is carried out through a series of strategic planning processes in the form of planning and budgeting which includes aligning company strategy with unit strategy as well as cascading bank wide targets into unit targets as outlined in the planning document.

Strategic planning documents include:

1. Corporate Plan
   A corporate planning document prepared to achieve the Bank's long-term goals for 5 (five) years. The Corporate Plan document is reviewed every 5 (five) years to adjust to changes in the business environment.
2. Bank Business Plan (RBB)
   A document outlining the Bank's short-term (one year) and medium-term (three years) business activities. The Bank Business Plan and Unit Business Plan documents are reviewed in the first semester of each year and may be reviewed more frequently if significant changes in the environment occur.
3. Work Plan and Company Budget (RKAP)
   A strategic planning document that contains the goals and objectives BNI aims to achieve, prepared with consideration of risk factors that may affect the achievement of the established goals. The Work Plan and Company Budget (RKAP) document is prepared annually.

Policies and Procedures

Policies related to Strategic Risk Management have been outlined in the General Risk Management Policy (KUMR) and the Integrated Risk Management and Capital Policy (KUMRT). Additionally, strategic risk management is also governed by the Strategic Risk Management Procedure, Strategic Planning Procedure, and Bank Product Implementation Procedure. Evaluation and/or updating of risk management policies and procedures are conducted periodically, in accordance with the Bank's internal and external developments as well as applicable laws and regulations.

Risk Management Process

In executing the control function of Strategic Risk, BNI implements strategic risk management policies in a process flow that consists of:

1. Strategic Risk Identification
   Strategic risk identification is conducted periodically and continuously. The process of identifying strategic risks is carried out by:
   a. Identifying strategic risk factors inherent in each functional activity that could potentially harm BNI, such as policies that are not aligned with BNI's vision and mission, lack of responsiveness to changes, implementation of policies that do not align with strategic plans, or implementation that does not adhere to established schedules.
   b. Analyzing risks, especially for strategies that require significant resources and/or are high-risk, such as entering new market segments, acquisition strategies, divestiture, or diversification strategies in terms of products and services.

2. Strategic Risk Measurement
   Strategic risk measurement is conducted using 4 (four) parameters, namely: alignment of strategy with business environment conditions, high-risk and low-risk strategies, the Bank's business position against competitors, and the achievement of the Bank Business Plan (RBB).

   Additionally, the quality of risk management implementation can be assessed based on governance results, risk management frameworks, risk management processes, information systems, human resources, and risk control systems.

   Detailed assessments of the strategic risk profile are documented in the strategic risk profile report, following the BNI Risk Profile Assessment Procedure.

3. Strategic Risk Monitoring
   BNI has a process for monitoring strategic risks conducted periodically. Strategic risk monitoring considers historical losses caused by strategic risks and/or deviations in the implementation of strategic plans.

Strategic issues arising from operational changes and business environment conditions that negatively impact BNI's business or financial condition are reported to the Board of Directors periodically, accompanied by an analysis of the impact on strategic risks and necessary corrective actions. Changes in macro conditions (external) are one of the main factors that can affect BNI's business conditions. To minimize the negative impact of these changes, BNI continuously monitors macro conditions to review strategy implementation.

The mechanism for monitoring the achievement of established business plans is conducted by comparing actual business results against set targets, as follows:

a. Monthly monitoring of BNI's performance and strategy achievements.
b. Quarterly monitoring of the performance of Divisions/Units in terms of the realization of Business Plan strategies.
c. Quarterly monitoring of the realization of the Bank Business Plan (RBB).
d. Monitoring of strategic issues and BNI's market share.
e. Semi-annual monitoring of the performance of the company and all units conducted in a Business Meeting forum at the Head Office and Regional Offices.

For the bank-wide scope, BNI has established a work unit that analyzes and monitors the realization of business strategies and work programs against targets, specifically the Corporate Planning & Performance Management (CPM) Division, including financial targets.

For the scope of Divisions/Units, supporting units and/or other specific units are designated to analyze and monitor the realization of business strategies and work programs against the implementation targets of those Divisions/Units periodically.

4. Strategic Risk Control
Strategic risk control is conducted by comparing actual financial performance with targets presented to the Board of Directors to ensure that the risks taken remain within tolerance limits and to report significant deviations to the Board of Directors. The risk control system is approved and reviewed periodically by the Board of Directors to ensure its ongoing suitability.

The mechanism for controlling strategic risks is based on the results of monitoring the following factors:

a. BNI's performance achievements compared to proportional targets and current year targets on a monthly basis in the Board of Directors meeting (Radisi), which can take strategic actions to manage strategic risks.
b. The realization of the Business Plan strategy for each Division/Unit, allowing for the identification of implementation issues and work program improvements to ensure that the established financial targets are achieved quarterly.
c. The realization of the Bank Business Plan targets to be reported to the Financial Services Authority (OJK) quarterly.
d. The performance achievements of the Bank and all units are conducted semi-annually in a Business Meeting forum at the Head Office and Regional Offices.

The Board of Directors continuously monitors the realization of strategy implementation and the achievement of targets outlined in the Bank Business Plan (RBB) periodically. If there are any strategy implementations and RBB achievements that do not meet targets, the Board of Directors requests the relevant units to make improvements.

5. Strategic Risk Management Information System
The strategic risk management information system is used to support the processes of identifying, measuring, monitoring, and controlling strategic risks. The strategic risk management information system owned by BNI includes the availability of information for:

a. Monthly Performance Monitoring Reports of BNI presented in the Board of Directors meeting (Radisi).
b. Reports on the Realization of the Bank Business Plan (RBB) to the Financial Services Authority (OJK).
c. Reports on the Realization of the Business Plan (BP) for each work unit to the relevant Sector Director.

COMPLIANCE RISK MANAGEMENT

Compliance Risk is the risk resulting from the Bank's failure to comply with and/or implement laws and regulations. BNI compliance risks can originate from, among other things, legal behavior, namely BNI behavior/ activities that deviate from or violate statutory provisions or regulations and organizational behavior, namely BNI behavior/ activities that deviate from or conflict with general

standards. Compliance risk management is carried out through consistent implementation of an internal control system. In practice, compliance risk is inherent in the Bank's risks related to applicable laws and regulations, such as the Minimum Capital Requirement (KPMM), Maximum Lending Limit (BMPK), Non-Performing Loans (NPL), Net Open Position (PDN), and Minimum Reserve Requirement (GWM).

Governance and Organization

BNI has a sufficient compliance risk management function with clear authority and responsibilities for each unit or work unit that carries out compliance risk management functions. Compliance Risk Management is conducted by the Compliance Division (CMP), which is under the active supervision of the Human Capital & Compliance Director.

Policies and Procedures

The implementation of Compliance Risk Management refers to the Compliance Risk Management Company Guidelines as well as other related Policies and Procedures, including the Company Guidelines for Compliance Work Procedures, Anti-Money Laundering Policies, Prevention of Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM), Implementation Procedures for the APU PPT PPPSPM Program, Compliance Charter, Company Guidelines for Procedures for Handling Conflicts of Interest, Company Guidelines for Gratification Control, Company Guidelines for Anti-Bribery Management Systems, and Company Guidelines for Compliance Risk Assessment.

Risk Management Process

In order to contribute to BNI's healthy and sustainable business growth, the Compliance Division assists the Human Capital & Compliance Director in implementing compliance functions and carrying out compliance risk management processes, including:

1. Compliance Risk Identification
   Compliance risk identification is carried out to recognize all types of risks inherent in each functional activity that have the potential to harm BNI, namely factors that can increase compliance risk exposure, such as:
   a. The type and complexity of BNI's business activities, including new products and activities.
   b. The number (volume) and materiality of BNI's noncompliance with internal policies and procedures, statutory provisions, and/or regulations as well as sound business ethical practices and standards.
   c. Various options for BNI's product and service facilities, such as remittance transaction services, which can serve as a gateway for assets resulting from criminal acts or funding for terrorist activities into the financial system, which can subsequently be utilized for the benefit of criminals.
   d. The utilization of information technology systems in the banking business sector can result in personal data being easily collected and transferred from one party to another without the knowledge of the data owner.

2. Compliance Risk Measurement
   Compliance risk measurement is conducted using indicators/parameters in the form of:
   a. The type and significance of the violations committed.
   b. The frequency of violations of provisions (BNI compliance track record).
   c. Violations of certain financial transaction provisions.

   As part of measuring compliance risk, the indicators/parameters as well as the weights and ratios used to measure the compliance risk profile are determined by the Compliance Division, taking into account input from the Board of Directors, the Enterprise Risk Management (ERM) Division, and other Units as well as Regulatory provisions.

   A detailed compliance risk profile assessment is outlined in the compliance risk profile report guided by the BNI Risk Profile Assessment Procedure. Compliance Risk Assessment is carried out by conducting compliance assessments or tests on policies that will/have been implemented, new bank products, as well as compliance opinions on transactions that will be carried out by BNI.

   Additionally, compliance risk measurement is conducted through the Compliance Index (periodically), which is a value indicating the level of compliance of a unit measured based on established parameters and criteria. The establishment of Compliance Index (CIX) parameters is based on incidents/events that occur from values, behaviors, and actions that do not comply with regulations, where the types of parameters are ranked based on the level (potential) of losses occurring from the largest to smaller levels.

3. Compliance Risk Monitoring
   Compliance risk monitoring includes monitoring and reporting Compliance Risks that occur to the Board of Directors, both at the time of the occurrence of Compliance Risks and periodically regarding:
   a. Maximum Lending Limit (BMPK)
   b. Net Open Position (PDN)
   c. Minimum Reserve Requirement (GWM) in both IDR and foreign currencies d. Non-Performing Loans (NPL)
   d. Minimum Capital Requirement (KPMM) ratio
   e. Fines and warnings from regulators, such as violations of the Financial Information Service System (SLIK)
   f. Implementation of new regulations
   g. Reporting obligations to external parties
   h. BNI's Composite Compliance Risk Rating.

4. Compliance Risk ControL
   Compliance risk control is conducted through ex-ante (preventive) actions or measures to ensure that the policies, provisions, systems, and procedures, as well as the business activities carried out by BNI, comply with the regulations of the Financial Services Authority (OJK), Bank Indonesia (BI), and the Ministry of State-Owned Enterprises (KBUMN), as well as applicable laws and regulations, and to ensure BNI's compliance with commitments made by the Bank to the Regulators (including OJK and BI), and/or other relevant supervisory authorities. Compliance Risk Control is conducted for organizational units within the country (including the Head Office and Subsidiaries) as well as organizational units abroad, where BNI must ensure adequate compliance with the laws and regulations in the countries where BNI's Overseas Offices (KLN) are located.

5. Compliance Risk Management Information System
   The compliance risk management information system is used to support the processes of identifying, measuring, monitoring, and controlling compliance risks. Accurate, complete, and timely information can be used to assess, monitor, and mitigate the risks faced by the Bank in determining corrective actions.

   The results of the identification, measurement, monitoring, and control of compliance risks are documented in the Compliance Report to the President Director through the Director overseeing the compliance function, with copies sent to the Board of Commissioners and the Compliance Risk Profile Report.

REPUTATION RISK MANAGEMENT

Reputation Risk is the risk resulting from a decrease in the level of stakeholder trust which originates from negative perceptions of the Bank. Reputation risk originates from events that have harmed the Bank's reputation, for example negative news in the mass media, violations of business ethics, and customer complaints as well as other things that can cause Reputation Risk, for example weaknesses in governance, corporate culture and the Bank's business practices and BNI's communication strategy is less effective.

Governance and Organization

BNI has a sufficient reputation risk management function with clear authority and responsibilities for each unit or work unit that carries out reputation risk management functions. Reputation risk management is carried out by the Corporate Secretary Division (CSE) which is under the active supervision of the President Director. Monitoring of news reports (news management) and management of communication crises as well as monitoring of news media or social media opinions/comments are carried out by the Corporate Secretary Division. Meanwhile, management of customer complaints/complaints is carried out by the Customer Experience Center (CXC) Division. Meanwhile, maintaining BNI's rating at investment grade, communicating company performance and strategies to analysts and investors, monitoring and analyzing the company's stock performance, the stock exchange, and peers, as well as managing cooperation relationships with relevant parties in the Indonesian capital market, is conducted by the Investor Relations Division (IRN).

Policies and Procedures

Policies related to reputation risk management have been outlined in the General Risk Management Policy (KUMR) and the Integrated Risk Management and Capital Policy (KUMRT). The procedures for reputation risk management that have been established include the Company Guidelines for:
1. Reputation Risk Management Procedures
2. Crisis Management
3. Media Relations Management
4. Consumer Protection
5. Customer Complaint Resolution

Risk Management Process

The Corporate Secretary Division (CSE), Customer Experience Center Division (CXC), and Investor Relations Division (IRN) carry out the functions and processes of reputation risk management, including the following processes:

1. Reputation Risk Identification
   Reputation risk identification is carried out from several data/information sources, including mass media reports, the BNI website, and social media network analysis, customer complaints through customer service or via mass media and social media, as well as customer satisfaction questionnaires.

   Reputation risk arises from, among other things:
   a. Negative media coverage and/or rumors about BNI
   b. Ineffective communication strategies of BNI
   c. Inadequate information/services
   d. Disruptions/damage to information technology systems and devices

   The process of identifying stakeholders (interested parties) is also conducted periodically to anticipate shifts and/or changes in attention towards the company (stakeholder mapping). This mapping is conducted regularly and in writing to be distributed to relevant units.

   BNI must record and administer every event related to Reputation Risk, including the amount of loss resulting from the incident in question in a data administration. The recording and administration of this data are compiled into a dataset that can be used to project losses for a certain period and activity. Each group of data and/or information is handled differently according to the reputation risk impact it creates.

2. Reputation Risk Measurement
   Reputation risk measurement is conducted using parameters:
   a. Reputation influence from the Bank's owners and related companies
   b. Violations of business ethics
   c. Complexity of the Bank's products and business collaborations
   d. Frequency, materiality, and exposure of negative news about the Bank
   e. Frequency, materiality, and customer complaints

   As part of measuring reputation risk, the indicators/parameters as well as the weights and ratios used to measure the reputation risk profile are determined by the Corporate Secretary Division (CSE), Customer Experience Center Division (CXC), and Investor Relations Division (IRN), taking into account input from the Board of Directors, the Enterprise Risk Management Division, and other Units as well as Regulatory provisions.

   A detailed assessment of the reputation risk profile is documented in the reputation risk profile report, guided by the BNI Risk Profile Assessment Procedure.

3. Reputation Risk Monitoring
   Reputation risk monitoring is conducted on:
   a. News management and crisis communication management, as well as monitoring opinions/comments on news media or social media and selecting strategies to respond to developing opinions in social media.
   b. Customer complaints in print media, online media, and social media, as well as through BNI Call.

   Daily, weekly, monthly, quarterly, and annual evaluations of the reputation risks faced by BNI are documented in the Media Monitoring Report.

4. Reputation Risk Control
   BNI promptly follows up and addresses customer complaints and legal claims that may increase Reputation Risk exposure and has developed mechanisms for effective reputation risk control. Reputation risk control includes:
   a. Prevention of events that may lead to reputation risk
   b. Recovery of BNI's reputation after events that may lead to reputation risk, which involves BNI's immediate response to restore its reputation and prevent further deterioration
   c. Developing the competencies of public relations staff in the Corporate Secretary Division (CSE) and Regional Offices to ensure they have the ability and sensitivity to respond to emerging issues and opinions
   d. Establishing Service Level Agreements (SLA) as standards for the speed of response to customer complaints
   e. Establishing Crisis Contingency Plans that are implemented when crises occur, ranging from minor to severe scales

   Mitigation of Reputation Risk and events that may lead to Reputation Risk is conducted with consideration of the materiality of the issues and costs. However, Reputation Risk may be accepted as long as it remains within the level of risk that will be taken.

5. Reputation Risk Management Information System
   The reputation risk management information system is used to support the processes of identifying, measuring, monitoring, and controlling reputation risks. The reputation risk management information system at BNI includes the availability of information for:
   a. Media Monitoring Information System
   b. Events that may lead to reputation risk, both in written form and through electronic systems, including discussions in board/management meetings
   c. Early warning system mechanisms to provide signals to management so that necessary actions and mitigations can be taken

INTRA-GROUP TRANSACTION RISK MANAGEMENT

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

The intra-group transaction risk management process includes:

1. Intra-group Transaction Risk Identification
   Identification of intra-group transaction risks is carried out by analyzing the types of products and/or transactions between LJKs in the BNI Financial Conglomerate which could give rise to intra-group transaction risks in the BNI Financial Conglomerate.

2. Intra-group Transaction Risk Measurement
   The aim of measuring intra-group transaction risk is to obtain a ranking of the level of risk of the Financial Conglomerate's intra-group transactions. What BNI needs to do as the main entity in measuring intra-group transaction risk is to develop a methodology for measuring intra-group transaction risk and evaluate the suitability of assumptions, data sources and procedures used to measure intra-group transaction risk.

3. Intra-group Transaction Risk Monitoring
   Intra-group transaction risk monitoring is carried out by evaluating intra-group transaction risk exposure that is material or has an impact on the capital condition of the Financial Conglomerate; as well as improving the reporting process and coverage, among other things, if there are material changes in business activities, products, transactions and risk factors. To assess material intra-group financial relationships between LJKs in the BNI Financial Conglomeration, it is measured based on the value of BNI's financial transactions with LJK members of the BNI Financial Conglomeration, as well as between fellow LJKs in the BNI Financial Conglomeration.

4. Intra-group Transaction Risk Control
   Intra-group transaction risk control on BNI Financial Conglomeration is carried out with notice:
   a. Composition of inherent risk parameters of intragroup transactions in the integrated risk profile assessment;
   b. Fulfillment of the arm's length principle (transaction fairness) regarding intra-group transactions;
   c. Availability and completeness of intra-group transaction documentation; and
   d. Fulfillment of applicable legal/regulatory provisions for each intra-group transaction.

INSURANCE RISK MANAGEMENT

Insurance risk is a risk resulting from the failure of an insurance company to fulfill its obligations to policyholders as a result of inadequacies in the risk selection process (underwriting), determining premiums (pricing), use of reinsurance, and/or handling claims.

The insurance risk management process includes:

1. Identification Identification of group insurance risks is carried out by analysis of factors that can increase insurance risk exposure, such as inadequacies in the risk selection process (underwriting), premium determination (pricing), use of reinsurance, and/or claims handling.

2. Measurement Measuring the insurance risks faced by BNI can be done using the parameters Technical Risk, Dominance of Insurance Risk in Overall Business Lines, Product Risk Mix and Types of Benefits and Reinsurance Structure.

3. Monitoring Insurance Risk Monitoring includes monitoring and reporting Insurance Risks that occur to the Board of Directors at any time when the Insurance Risk occurs or periodically to:

a. Ratio of Technical Reserves to Net Premiums.
b. Claim Ratio.
c. Net Premium Ratio to Own Capital.
d. Lapse Ratio.
e. Domination of insurance risk over all business lines.
f. Reinsurance Management

Monthly evaluations of insurance risks faced by BNI are outlined in the Leading Risk Indicator Report which is submitted to the Director of the Risk Management Sector.

4. Control Insurance risk control is carried out by maintaining insurance risk ratios at their threshold and carrying out improvement initiatives to improve ratios that are still considered high risk and ensuring that the risks taken are still within tolerance limits and reporting significant deterioration to the Board of Directors.

RISK MANAGEMENT FOR OVERSEAS OFFICES (KLN)

BNI has tools of risk management at its overseas branches, including credit risk, market risk and liquidity risk.

- Credit Risk
  The Enterprise Risk Management (ERM) Division has carried out identification and monitoring of everseas branches' credit risk using the Internal Rating Based (IRB) model through the Internal Rating System 2.0 (IRS) tool which is monitored quarterly as an early warning system if a decrease in the debtor's rating is indicated.

  In addition, in the credit process for determining the pipeline, the ERM Division has determined a Risk Acceptance Criteria (RAC) for the recommended economic sectors that cover 5 (five) aspects: Market; Operational; Environment, Social and Governance; Partners; and Price.

- Market Risk
  The Enterprise Risk Management (ERM) Division through the Middle Office function has set limits for Treasury transactions consisting of Budget Loss Limit for Forex and Securities FVOCI transactions, Deal Ticket Size Limit, and Net Open Position Limit and has set Management Action Trigger (MAT) through MAT Traffic Light as a limit for taking action against changes in value that result in losses.

- Liquidity Risk
  The Enterprise Risk Management (ERM) Division has monitored branch offices' liquidity by fulfilling the Maturity Profile and Reserve Requirement periodically using the traffic light approach.

In connection with the implementation of the New Way of Working (NWOW), in the Overseas Office (KLN) there is a strengthening of the KLN risk management function in terms of the first line (1st), second line (2nd) and third line (3rd):

- On the 1st line side, the overseas offices have a Risk Management & Internal Control (RMIC) function under the oversight of the Risk & Business Support Deputy General Manager. Also in place is a SORX Wholesale & International Banking (SORX1) function that has a coordination line to RMIC KLN. SORX1 has provided Process, Risk, Control & Monitoring (PRCM) tools as a guide for RMIC to conduct control testing on the established risk controls.
- On the 2nd line side, an overseas offices Risk Management Team has been set up under the oversight of the Enterprise Risk Management (ERM) Division which also has a coordination line with RMIC, functioning to ensure that well-run risk management framework there. In addition, there is also strengthening of Operational risk and KLN Compliance risk under the oversights of the Operational Risk Management (ORM) Division and the Compliance Division (CMP).
- On the 3rd line side, the Internal Audit function remains the duty of Head Office (IAD) Internal Audit.

Currently, BNI has 8 (eight) overseas offices consisting of 6 (six) branches with licenses as Branches and 2 with licenses as Representative Offices, where each has different operational complexities from one another that makes it necessary to determine the minimum requirement standards for each one of them.

The Enterprise Risk Management (ERM) Division has determined the minimum requirement standards in the form of parameters/indicators that must be met by each overseas offices using the Risk Management Implementation Quality Assessment (KPMR) approach as stipulated in SEOJK No.14/SEOJK.03/2017 concerning Bank Health Level Assessment.

RISK MANAGEMENT OF NEW PRODUCTS AND ACTIVITIES

Every Bank product development plan goes through a risk management process including identification, measurement, monitoring and control on 8

(eight) types of risks including credit, market, liquidity, operational, legal, strategic, compliance and reputation risks which are packaged in a comprehensive study of the bank's new product and activity risks. The Bank's product risk management is run based on internal provisions that refer to regulatory provisions.

In order to issue new products, BNI has policies and procedures to manage the risks inherent in new products which include:

1. Business review to determine whether the new products provide benefits or are consistent with BNI's vision and mission.
2. Systems, procedures (Standard Operating Procedures) and authority in managing new products.
3. Identification of all risks (credit, market, liquidity, operational, legal, reputation, strategic and compliance risks) inherent in new products, both those related to business activities and customers.
4. Trial period for risk measurement and monitoring methods for new products.
5. Accounting information system for new products.
6. Legal analysis for new products.
7. Transparency of information to customers.
8. Customer protection in accordance with provisions on Consumer Protection.
9. Protection of Personal Data.

Considering that it has now entered the digital era and that there is a growing demand from customers for digital-based Bank products, then, for when developing digital-based products, BNI first ensures that it is technologically ready to run risk management, especially security control, to ensure the fulfillment of the principles of confidentiality, integrity, authenticity, availability, and non-repudiation.

In addition, as an organizer of Financial Sector Technology Innovation (ITSK), BNI applies the principles of (1) Governance, (2) Risk management, (3) Security and reliability of information systems, including cyber resilience, (4) Consumer protection and protection of personal data, and (5) Regulatory Compliance. BNI also implements cyber risk management in accordance with best practices including aspects of protecting confidentiality, integrity and availability of information in supporting the continuity of business processes.

As part of efforts to improve and accelerate processes in the development of the Bank's products and activities, BNI has established a dedicated unit, the *Project Product Life Cycle Management (PMU) Team*. This team serves an advisory function, assisting product owners in expediting processes while ensuring that all potential risks are identified and appropriate mitigation measures are implemented.

Any plan to issue new Bank products for a period of 1 (one) year is reported to the Regulator, the Financial Services Authority and Bank Indonesia (if the product contains Payment Service Provision and Payment Infrastructure Provision activities) in the Bank Product Implementation Plan (RPPB) contained in the Bank Business Plan (RBB).

In July 2024, or on July 5, 2024, BNI released wondr by BNI, a new mobile banking app that has been featured with the latest technology with global standards, offering more personal services and tailored to the needs of each customer in managing finances and planning for the future. In addition, in October 2024, BNI also developed a product in the form of the BNI Corporate Portal which is a desktop website-based application that integrates BNI wholesale channels into Single Access (SSO/Single Sign On), and provides a Hybrid Digital Onboarding feature. For this innovation, BNI has conducted a risk study on each feature contained in wondr by BNI (both development features and new features) and the BNI Corporate Portal.

BNI RISK PROFILE ASSESSMENT

Risk Profile Assessment is a comprehensive description of the risks inherent in the Bank's operational activities. The Risk Profile is prepared as one of the assessment components in the Bank Health Level report which is prepared quarterly for BNI Individual and semi-annually for BNI Financial Conglomerate (Integrated).

BNI RISK PROFILE INDIVIDUALLY

Risk Profile Assessment is an assessment of the Inherent Risk and the Quality of Risk Management Implementation in the Bank's operational activities. The risks that must be assessed consist of 8 (eight) types of risks. In assessing the Risk Profile, the Bank pays its due attention to the regulated scope of risk management.

Inherent Risk Assessment

Inherent Risk Assessment is an assessment of the risks inherent in the Bank's business activities, both quantifiable and non-quantifiable, which have the potential to affect the Bank's financial position.

The characteristics of the Bank's inherent risk are determined by internal and external factors, including business strategy, business characteristics, complexity of the Bank's products and activities, the industry in which the Bank runs the business, and macroeconomic conditions.

The inherent risk is assessed with due consideration of quantitative and qualitative parameters/ indicators. The level of inherent risk for each type of Risk is deteremined with due reference to the general principles of assessing the Health Level of Commercial Banks. The determination is categorized into:

1. Rank 1 (Low)
2. Rank 2 (Low to Moderate)
3. Rank 3 (Moderate)
4. Rank 4 (Moderate to High)
5. Rank 5 (High)

Assessment of The Quality of Risk Management Implementation

The sssessment of the quality of Risk Management implementation reflects the adequacy of the Risk control system that covers all pillars of Risk Management implementation as stipulated in the provisions of the Financial Services Authority concerning the implementation of Risk Management for Commercial Banks. The Quality of Bank Risk Management Implementation varies greatly according to the scale, complexity and level of the Bank's Risk Tolerance. Thus, in assessing the Quality of Risk Management Implementation, it is necessary to consider the characteristics and complexity of the Bank's business. Assessment of the quality of Risk Management implementation is an assessment of 4 (four) interrelated aspects, namely:

1. Risk governance
2. Risk Management Framework
3. Risk Management Process, adequacy of human resources and adequacy of management information systems
4. Adequacy of the Risk control system, taking into account the characteristics and complexity of the Bank's business

The KPMR level is determined comprehensively to identify s the strengths and weaknesses of each pillar of Risk Management. The KPMR level for each Risk is categorized into 5 (five) levels, namely:

1. Rank 1 (Strong)
2. Rank 2 (Satisfactory)
3. Rank 3 (Fair)
4. Rank 4 (Marginal)
5. Rank 5 (Unsatisfactory)

BNI Risk Profile Assessment Results

The results of the BNI Risk Profile self-assessment individually as of December 31, 2024 fell under rank 2 (Low to Moderate) with an Inherent Risk Rating of Low to Moderate and a Risk Management Implementation Quality (KPMR) rating of Satisfactory, with the following details:

Type of Risk	Inherent Risk	Risk Management Implementation Quality	Composite Risk
Credit Risk	Moderate	Fair	3
Market Risk	Low to Moderate	Satisfactory	2
Liquidity Risk	Low to Moderate	Satisfactory	2
Operational Risk	Moderate	Fair	3
Legal Risk	Low	Satisfactory	1
Strategic Risk	Moderate	Satisfactory	2
Compliance Risk	Low to Moderate	Satisfactory	2
Reputational Risk	Low	Satisfactory	1
Composite Rating	Low to Moderate	Satisfactory	2

BNI RISK COMPOSITE RATING ASSESSMENT

Based on the Regulation of the Minister of SOEs No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises and Technical Instructions No. SK-7/DKU.MBU/10/2023 concerning Technical Instructions for Reporting Risk Management of State-Owned Enterprises, SOEs shall make composite risk rating assessment through quarterly self-assessment to provide an evaluation that encourages SOEs to improve its risk management practice that provides protection and value creation for SOEs.

The composite risk rating assessment is based on 2 (two) assessment variables, namely (1) assessment of the Quality of Risk Management Implementation, and (2) assessment of Performance Achievement. The results of the BNI composite risk rating assessment for the fourth quarter of 2024 fell under Rank 2 (well-controlled risk).

INTEGRATED BNI RISK PROFILE

Based on the results of the Integrated Risk Profile assessment of 10 (ten) types of risks as of December 31, 2024, it fell under rating 2 (low to moderate) with an Inherent Risk Rating of Low to Moderate, while the Integrated Risk Management Implementation Quality (KPMR) assessment of BNI was Satisfactory, which means that:

1. The potential for losses faced by the Financial Conglomerate as a whole is relatively low during a certain period of time in the future.
2. The composite Risk Management Implementation Quality is adequate, although there are minor weaknesses that need management attention but can be resolved in normal business activities.

The results of the Integrated Risk Profile assessment in detail are as follows:

Type of Risk	Inherent Risk	Risk Management Implementation Quality	Composite Risk
Credit Risk	Moderate	Fair	3
Market Risk	Low to Moderate	Satisfactory	2
Liquidity Risk	Low to Moderate	Satisfactory	2
Operational Risk	Moderate	Fair	3
Legal Risk	Low	Satisfactory	1
Strategic Risk	Moderate	Satisfactory	2
Compliance Risk	Low to Moderate	Satisfactory	2
Reputational Risk	Low	Satisfactory	1
Intragroup Transaction Risk	Low	Satisfactory	1
Insurance Risk	Low to Moderate	Fair	2
Composite Rating	Low to Moderate	Satisfactory	2

RISK MATURITY INDEX (RMI)

The Risk Maturity Index (RMI) is an index used to measure the level of design quality and effectiveness of the implementation of Risk Management in giving protection and creating value. In compliance with the Regulation of the Minister of SOEs No. PER-02/MBU/03/2023 dated March 24, 2023, BNI shall make regular RMI assessments with due consideration of the decision of the deputy for finance and risk management KBUMN No. SK-8/DKU.MBU/12/2023 dated December 6, 2023 concerning Technical Instructions for Risk Maturity Index Assessment. The RMI assessment is based on performance, such as combining RMI assessments based on 5 (five) dimensions: (1) risk culture & capabilities, (2) risk organization & governance, (3) risk & compliance framework, (4) risk processes & controls, and (5) risk models, data, and technology, with performance realization consisting of the Final Rating Health Level and the Risk Composite Rating.

BNI has implemented RMI assessment since 2021, and made periodic improvements. In accordance with the direction of KBUMN, BNI conducted an RMI assessment in 2024 with an assessment observation period of January 1 to December 31, 2023, carried out by an independent assessor who assessed the maturity of risk management. The RMI assessment in 2024 was carried out with the scope of the entire entity, reffered here as BNI and its Subsidiaries, such as BNI Sekuritas, BNI Finance, BNI Life, BNI Ventures, hibank, BNI Asset Management and BNI Securities. The results of the BNI RMI assessment in 2024 are on the spectrum of the Good Practice Phase sub-level of the Good Practice Phase (+). This shows BNI's commitment to implementing mature risk management both in terms of culture and capability, fulfillment of the organization and its governance, the framework and provisions that cover, processes and controls over risk as well as models, data and information technology that are enablers of increasingly optimal risk management.

Based on the results of the 2024 RMI assessment, BNI has implemented strong risk management practice dimensions, including:

1. Risk Culture and Capability Dimension: BNI has had continuously implemented risk culture instillation programs. There is also a risk skills improvement curriculum that has been adjusted to the position level.
2. Risk Organization and Governance Dimension: BNI has fulfilled the Risk Management Organ in accordance with PER-2/MBU/03/2023, and implemented the Three-Line Risk Governance Model well. BNI has also made periodic evaluations and optimizations to improve risk governance.
3. Risk Framework and Compliance Dimension: BNI has successfully implemented an effective risk management framework for key risks, especially in mitigating data confidentiality risks and corporate continuity plans.
4. Risk Process and Control Dimension: BNI has implemented the process of identifying, assessing, treating, and reporting risks effectively, with good understanding and implementation at every level.
5. Risk Model, Data, and Technology Dimension: BNI has an information system that is used consistently to support the management of some key risks. BNI also has a special risk model and analytics team, using tools and methodologies to manage key risks, and using a risk data quality maintenance framework.

Based on the overall assessment by independent parties, BNI has succeeded in mapping several areas of improvement that have been carried out in the short, medium, and long term. BNI has developed many initiatives to support the bank's performance. Such as strengthening cyber risk management in accordance with the IT & digital risk management framework. Strengthening market and liquidity risks by developing simulations and stress tests to anticipate dynamic global and domestic conditions. Improving compliance risk management with the increasing popularity of RegTech (Regulatory Technology, which means the application of technology for regulatory reporting functions, e.g., LBUT/Antasena, SIPENA).

IMPROVING HUMAN RESOURCES CAPABILITIES RELATED TO RISK MANAGEMENT

In order to implement quality risk management, BNI manages Human Resources (HR) and develops the quality of its HR sustainably:

1. Establishment of the Risk Academy Unit through the following programs:
   a. User RM Tool Connect Workshop
   b. Effective Collaborative Leadership & Collection Strategy
   c. Credit Quality Improvement Strategy Training (Restructuring) in 2024
   d. KBUMN Risk Based Planning & Risk Modeling Training
   e. Effective Model Risk Management (MRM) Training
   f. Palm Oil Plantation Industry Analysis
   g. Webinar "Early Warning Systems: Detecting and Preventing Liquidity Risks."
   h. Workshop on Alignment of Company Guidelines (PP) Operational Risk Management Procedures
   i. Association of Certified Anti-Money Laundering Specialists (ACAMS)
   j. Anti Fraud Awareness Webinar "Social Engineering: Definition, Types, and Prevention Methods"
   k. Anti Fraud Awareness Webinar "Avoid Online Gambling and Illegal Online Loans"
   l. Anti Fraud Awareness Webinar "Smart and Wise in Managing Personal Finances"
   m. Anti-Fraud 360 Seminar
   n. Procurement Fraud Training
   o. Making Operational Risk Management Videos
   p. Firm Workshop - Wide Stress Testing using Web App & Mobile App
   q. BCM Framework Workshop & Preparation of CMT Pandemic Playbook - CMT Cyber
   r. Preliminary Proactive Control Design Forum (PCDF) Training
   s. 2024 Carbon Emission Operational Data Reporting Training
   t. Greenhouse Gas (GHG) Calculation, Mitigation, Audit, & Reporting
   u. Indonesian Sustainable Finance Taxonomy Classification Training (TKBI)
   v. Risk Management Training for Risk Management & Internal Control (RMIC) Overseas Offices (KLN)
   w. Sharing Session on Non-Performing Loan (NPL) Credit Management and Write-Offs in KLN Singapore and KLN Hong Kong

x. Risk Maturity Index (RMI) Workshop
y. Quality Assurance Improvement Programs Workshop
z. ORIC SORX2 Brevet
   aa. Financial Risk Management (FRM) Training/Certification
   bb. Reinforcement Workshop AMGR, MGR, AVP, ORIC, SORX1, SORX2, and SORX3
   cc. Risk Management Certification Levels (JK) 4 (four), 5 (five), 6 (six), and 7 (seven)
   dd. Training on Trainers (ToT) Qualification Levels 6 (six) and 7 (seven)
   ee. Credit Legal Aspects: Legal Strategy

2. Risk Management Certification and Refreshment
   Ownership of the Risk Management Certificate for HR is determined for Members of the Board of Directors, Members of the Board of Commissioners, Independent Parties of the Risk Monitoring Committee, Executive Officers and Officers other than Executive Officers in the risk management work unit, compliance work unit and internal audit work unit as well as the main operational work unit that makes and implements decisions on risks including credit, treasury, information technology, and finance. For those who have received Risk Management Certification, BNI continues to carry out education with a refreshment program to maintain the competence of the holder or owner of the Risk Management Certificate in the field of Bank risk management at least 1 (one) time in 1 (one) year after the issuance of the Risk Management Certificate. Forms of maintenance program activities include in-house training, seminars, socialization of provisions from authorized authorities, workshops, workshops, e-learning, and/or work portfolios related to Bank Risk Management.

3. E-Learning Method
   Risk management education is also carried out by BNI through the e-learning method which can be done independently by all BNI employees through the BNISmarter portal. This aims to increase the knowledge and risk awareness of all BNI employees through materials that have been prepared as learning materials.

4. Socialization and Education
   BNI supports all employees in participating in education and socialization through seminars and training organized by external and internal parties.

RISK MANAGEMENT ACTIVITY REPORT 2024

In relation to the implementation of effective and efficient risk management, risk management has been carried out through several risk management activities, as follows:

1. Individual BNI Risk Management Activity Report
   a. Implementation of periodic BNI Risk Appetite Statement (RAS) review and communicating the results of the 2024 Risk Appetite Statement (RAS) review to all BNI units to be used as a guideline in BNI's business activities.
   b. Preparation of strategies and implementation of risk management in the BNI Bank Business Plan (RBB) 2024/2026 through direct coordination with each risk management unit.
   c. implementation of a review of the calculation parameters for BNI's Risk Profile and Bank Health Level (TKB) through coordination with each risk management unit to be further implemented in the assessment of BNI's Risk Profile quarterly and BNI's Bank Health Level (TKB) semi-annually.
   d. Reviews of BNI Risk Management Policy every 1 (one) time and 1 (one) year, namely General Risk Management Policy, General Integrated Risk Management Policy, and Integrated Capital and General Internal Control System Policy.
   e. Review of Company Guidelines (PP) for Risk Management, including Credit, Market, Liquidity, Operational, Legal, Compliance, and Reputation Risk Management Procedures. In addition, a review is also carried out on the Action Plan Procedure (Recovery Plan), Resolution Plan Procedure, Internal Capital Adequacy Assessment Process Procedure, Risk Appetite Statement Determination Procedure, Risk Maturity Index Procedure, Procedure and Technical Instructions for Risk Profile Assessment.
   f. Assessment of risk maturity level (Risk Maturity Index) with the scope of the entity, namely BNI and BNI Subsidiaries, namely BNI Securities, BNI Finance, BNI Life, BNI Ventures, hibank, BNI Asset Management and BNI Securities.
   g. The preparation of the Risk Exposure and Capital Publication Report quarterly and review of the Long Form Report (Risk Management) and Annual Report annually through coordination with related divisions and units.

h. Risk analysis/assessment on new Bank products and Bank activities along with a review of the fulfillment of follow-up actions on risk mitigation recommended in the risk assessment document, through intense coordination between business units and risk units and coordination with regulators, both with the Financial Services Authority and Bank Indonesia.
i. Follow-up actions on the results of the resolvability test conducted by the Deposit Insurance Corporation will be prepared through coordination with related divisions and units to be submitted to the Deposit Insurance Corporation according to the timeline.
j. Preparation of Internal Risk Analysis (IRA), including analysis of 8 (eight) types of risk, monitoring of Risk Appetite, Risk Tolerance, and trigger level Recovery Plan on a monthly basis.
k. Implementation of Governance and Significant Corporate Activities of State-Owned Enterprises, namely the preparation of the BNI Company Work Plan and Budget (RKAP) on an annual basis along with its realization on a quarterly basis.
l. Update of BNI Recovery Action Plan Document 2024.
m. BNI's participation in COP29, the United Nations (UN) Climate Change Conference held in Baku, Azerbaijan in November 2024, and the holding of the BNI ESG and Sustainability Transition Event or BEST Event with the theme "Energy Sectors Foresight to Encounter the Indonesian Sustainable Finance Taxonomy (TKBI)" which discussed the sustainable finance taxonomy, regional development landscape, and implementation steps in Indonesia.
n. Implementation of assistance to Subsidiaries and KLN includes:
    1) Assistance in credit risk management to Subsidiaries through a review of the credit risk profile calculation methodology and sharing sessions on credit scoring methodology
    2) Sharing sessions related to the Climate Risk Stress Test (CRST) Methodology and Implementation with BNI Singapore
    3) Socialization related to the Operational Risk Management Framework to Subsidiaries
    4) Sharing sessions, including routine checkpoints related to the implementation of the Personal Data Protection Law in all Subsidiaries
    5) Socialization to all Subsidiaries regarding the General Policy for Integrated Risk Management and Integrated Capital at BNI and the provisions of the Ministry of SOEs No. PER-2/MBU/03/2023
    6) Basic Risk Management training with a focus on strengthening the Risk Management & Internal Control (RMIC) function of KLN
    7) Support for requests for risk studies on KLN Singapore Wealth Management services and Bank Indonesia Market Entry Permits for Long-Term Non-Conventional Overseas Funding
    8) Support for the need for internal and external audits of branch offices
    9) Support for Overseas Branch Standardization & Centralization project
o. Calculation of Risk Weighted Assets (RWA) for Credit Risk, Market Risk, and Operational Risk
p. Calculation of credit risk stress testing through Bottom-Up Stress Test and Stress Test Recovery Plan calculations
q. Review of Loan Exposure Limit (LEL) and Reviews of Credit Risk Premium (CRP) calculations, as well as monitoring of loan space available periodically and monitoring of Credit Risk Appetite realization
r. Preparation of loan portfolio analysis/study, monitoring of realization of 25 Core Debtors, and calculation and reporting of BNI credit quality, including restructuring credit to regulators
s. Review of Industry Risk Rating (IRR), Industry Risk Appetite, and Risk Appetite Criteria (RAC) per prospective economic sector for wholesale and retail segments
t. Monitoring of Business Banking debtor rating system in corporate, medium, and small segments as well as monitoring of Early Warning System (EWS) in corporate and public company segments
u. Market risk monitoring, including Value at Risk (VaR), Stress Value at Risk (SVaR), Budget Loss and Management Action Trigger (MAT), EWS Forex, EWS Securities, Off Market Price (middle office), and Fairness of JIBOR Quotation
v. Evaluation of Interest Rate Risk in Banking Book (IRRBB) calculation

w. Review of Liquidity Risk limits, including BNI Wide and Regional Cash Ceilings in both Rupiah and Foreign Currency, Maturity Profile Limits in both Rupiah and Foreign Currency, Safety Levels in both Rupiah and Foreign Currency, and EWS Liquidity in both Rupiah and Foreign Currency
x. Periodic liquidity monitoring, including Primary Reserve (PR), Liquidity Reserve (CL), Macroprudential Intermediation Ratio (RIM), Foreign Currency Credit Provision Indicator, LDR Ratio, and AL/DPK and AL/NCD Ratio
y. Calculation of Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) Individually and Consolidated

2. BNI Risk Management Activity Report on Consolidated and Integrated
   a. Preparation of Integrated Risk Appetite Statement review
   b. Review of Integrated Risk Management General Policy and Integrated Capital.
   c. Assessment of Integrated Risk Profile
   d. Calculation of Minimum Capital Adequacy Obligation on a Consolidated and Integrated basis
   e. Review of Leading Risk Indicator (LRI) methodology
   f. Review of integrated risk profile methodology.
   g. Assessment of Bank Health Level on a Consolidated basis.
   h. Implementation of discussion forums that discuss important issues related to both business and risk in all Subsidiaries.
   i. Implementation of a Monthly Risk Forum with an agenda to discuss key risk indicators from each Subsidiary to strengthen the implementation of Subsidiary risk management.
   j. Regular checkpoints related to updates on the progress of the Risk Maturity Index assessment of all Subsidiaries with the scope of the entity, namely BNI and BNI Subsidiaries, namely BNI Securities, BNI Finance, BNI Life, BNI Ventures, hibank, BNI Asset Management, and BNI Securities, as well as coordination related to the follow-up of all Subsidiaries on RMI improvement recommendations as a form of monitoring the Main Entity.

SIMULATION OF WORST CONDITIONS AND STRESS TESTING

Stress testing is one of the risk management tools used by BNI to evaluate the impact of a severe but plausible scenario on the Bank's financial condition.

BNI carries out stress testing periodically as a basis for consideration for decisions and directions of the Board of Directors and Board of Commissioners or in making Bank decisions as well as in compliance with applicable regulatory provisions both in Indonesia and regulatory provisions at each Foreign Office (KLN). In addition to being a basis for decision-making and compliance with regulations, stress testing also aims to estimate the magnitude of losses that will arise as well as the resilience of the Bank's capital in absorbing these losses and identify steps that must be taken to mitigate risks and maintain the resilience of the Bank's capital. In terms of liquidity, the stress test functions to estimate the adequacy of the Bank's liquid assets to fulfill obligations, both contractual and behavioral.

In implementing stress testing, BNI carries out 2 (two) approaches, namely using historical or hypothetical scenarios to measure the impact of an extreme condition or series of events (scenario stress testing) and testing the sensitivity of the Bank's exposure, activities, and risks to a particular variable or parameter (sensitivity analysis). The implementation of stress testing at BNI covers the main types of risk, namely Credit Risk, Market Risk and Liquidity Risk, where the calculations use statistical models and financial models developed by BNI considering historical data and hypotheses.

The results of stress testing carried out by BNI throughout 2024 show that BNI's capital is still able to absorb losses that arose and is able to maintain sufficient liquidity with rapid anticipation in terms of asset and liability management as well as the readiness of policies to support funding plans. In addition, BNI has also established risk mitigation for possible losses that may arise.

RECOVERY ACTION PLAN

The Recovery Action Plan is a plan to address financial problems that may occur in the Bank, as stated in the Recovery Action Plan document, which is reviewed periodically. The preparation of the Recovery Action Plan is a fulfillment of OJK Regulation Number 5 of 2024, dated March 27, 2024, concerning the Determination of the Supervision Status and Handling of General Bank Problems, which is intended as a commitment from the Bank, controlling shareholders and/or other parties to handle problems using the Bank's own resources and the Bank's business approach.

The preparation of the BNI Recovery Action Plan has the following objectives:

1. To ensure that BNI has a plan to address financial problems that may occur.
2. To ensure that BNI has determined recovery options as a choice of actions to be taken to respond to the financial stress experienced.
3. To ensure that BNI has a mechanism related to the implementation, evaluation and testing (stress testing) as well as updating the recovery action plan.

BNI has submitted the 2024/2025 Recovery Action Plan Document to the Financial Services Authority (OJK) according to the timeline.

RESOLUTION PLAN

The Resolution Plan is a handling or resolution plan by the Deposit Insurance Corporation (LPS) when a Bank is declared a Bank in Resolution, stated in the Resolution Plan document which is reviewed every 2 (two) years, if the Bank experiences a significant change in financial condition to assets, liabilities, and/or equity in accordance with the Deposit Insurance Corporation Regulation. The preparation of the Resolution Plan is a fulfillment of the Deposit Insurance Corporation Regulation No. 2 of 2024 concerning the Resolution Plan for Commercial Banks. The Resolution Plan is a commitment from the Bank, controlling shareholders and/or other parties to realize an effective Bank resolution in order to reduce systemic disruptions to the stability of the financial system and minimize the use of public funds (APBN) in the Bank's resolution.

The preparation of the BNI Resolution Plan has the following objectives:

1. Ensure that BNI has a plan to address problems when the Bank is declared a Bank in Resolution.
2. Ensure that BNI has determined resolution options as a choice of actions to be taken to respond to systemic disruptions to the stability of the financial system experienced.
3. Ensure that BNI has a mechanism related to the implementation, evaluation and testing (stress testing) as well as updating the resolution plan.

BNI is not required to submit a periodic Resolution Plan for the 2024 period because based on the results of the assessment of changes in BNI's financial condition, it was found that both the Total Assets, Total Liabilities, and/or Total Equity components in the audited financial publication report as of June 30, 2022 (according to the date of the first submission of the Resolution Plan report) compared to the conditions as of June 30, 2024 for individual data, all are less than 20% (twenty percent), as the limit for material changes in financial condition.

In 2024, BNI submitted a follow-up to the results of the resolvencies test conducted by the Deposit Insurance Corporation (LPS) on the Resolution Plan Document first submitted by BNI in 2022.

CLIMATE RISK STRESS TEST (CRST)

Climate Risk Stress Test (CRST) aims to analyze and evaluate the impact of climate change on financial performance and the health level of financial institutions using the Network for Greening the Financial System (NGFS) simulation. BNI has reported the results of the Climate Risk Stress Test (CRST) calculation according to OJK's direction with a coverage of 6 (six) productive sectors and property ownership credit (mortgage), with the following details:

1. Agriculture, Forestry, and Fisheries
2. Mining and Quarrying
3. Procurement of Electricity, Gas, Steam/Hot Water and Cold Air
4. Construction
5. Transportation and Warehousing
6. Processing industry (primarily in the metal, paper, chemical, and textile industries)

In an effort to support the commitment to sustainability and climate change mitigation, BNI has developed the Climate Risk Stress Test (CRST) Tool. This tool is designed to assist BNI in calculating CRST, which aims to analyze and evaluate the impact of climate change on financial performance and the health level of financial institutions using the Network for Greening the Financial System (NGFS) scenario simulation in accordance with OJK's

direction. The NGFS scenarios used in the stress test include orderly (Net Zero 2050), disorderly (delayed transition), and hothouse world (Current policies) scenarios with short-term time horizons (2024, 2025, 2026) and long-term (2030, 2040, and 2050). In addition to calculating the Stress Test on climate change, the CRST tool was also developed to calculate BNI's financing emissions using the PCAF (Partnership for Carbon Accounting Financials) methodology.

As part of a strategic step to support a green economy, BNI has expanded the scope of financing emission calculations, which previously only covered the Corporate, Enterprise, and Medium segments, now covering the Micro, Small, and Medium Enterprises (MSMEs) segment. This step was taken to ensure that all BNI financing segments contribute to efforts to reduce carbon emissions. This expansion is also in line with BNI's commitment to support sustainable and environmentally friendly MSME growth.

Risk Exposure Disclosure

1. CREDIT RISK

Disclosure of Qualitative Information related to Credit Risk in General

Description	Definition
Qualitative Information related to Credit Risk in General	Disclosure of Qualitative Information related to Credit Risk in General has been submitted through the Risk Management Implementation Report for Credit Risk as part of the Bank's Health Level Report for the period December 31, 2024.

Disclosure of Credit Quality of Assets

1) Disclosure of Credit Quality of Assets - Bank Only

(in million Rupiah)

		December 31, 2024						
		Gross Carrying Amount		Allowances for Impairment Losses (d+e)	CKPN		Allowances for Impairment Losses (IRB Approach)	Net Value (a+b+c)
		Past Due Receivables	Past Undue Receivables		Stage 2 and Stage 3	Stage 1		
		a	b	c	d	e	f	g
1	Loan	15,228,783	746,321,521	38,328,598	34,314,319	4,014,278		723,221,706
2	Securities	316,989	127,184,192	35,871	-	35,871		127,465,309
3	Administrative Account Transactions	929,702	137,032,311	-	-	-		137,962,012
4	Total	16,475,473	1,010,538,023	38,364,469	34,314,319	4,050,150		988,649,027

2) Disclosure of Credit Quality of Assets - Bank Consolidated with Subsidiaries

(in million Rupiah)

		December 31, 2024						
		Gross Carrying Amount		Allowances for Impairment Losses (d+e)	CKPN		Allowances for Impairment Losses (IRB Approach)	Net Value (a+b+c)
		Past Due Receivables	Past Undue Receivables		Stage 2 and Stage 3	Stage 1		
		a	b	c	d	e	f	g
1	Loan	15,313,935	760,570,701	38,684,520	34,553,349	4,131,171		737,200,116
2	Securities	316,989	130,273,925	35,875	-	35,875		130,555,039
3	Administrative Account Transactions	929,702	140,956,448	-	-	-		141,886,149
4	Total	16,560,625	1,031,801,074	38,720,395	34,553,349	4,167,046		1,009,641,304

Disclosure of Changes in Loan and Past Due Securities

1) Disclosure of Changes in Loan and Past Due Securities - Bank Only

(in million Rupiah)

		December 31, 2024
		a
1	Past Due Loan and Securities on last reporting period	15,498,518
2	Past Due Loan and Securities since last reporting period	11,733,800
3	Past Undue Loan and Securities that return to receivables	196,588
4	Write-Off Value	18,668,815
5	Other Movements	7,178,857
6	Past Due Loan and Securities on last reporting period (1+2-3-4+5)	15,545,771

2) Disclosure of Changes in Loan and Past Due Securities - Bank Consolidated with Subsidiaries

(in million Rupiah)

		December 31, 2024
		a
1	Past Due Loan and Securities on last reporting period	15,567,452
2	Past Due Loan and Securities since last reporting period	11,735,122
3	Past Undue Loan and Securities that return to receivables	196,588
4	Write-Off Value	18,668,815
5	Other Movements	7,193,753
6	Past Due Loan and Securities on last reporting period (1+2-3-4+5)	15,630,924

Additional Disclosures regarding Credit Quality of Assets (CRB)

A. QUALITATIVE

Based on additional disclosures related to Credit Quality of Assets, "Paid Claims" refers to the portfolio category of matured claims as stated in Appendix A of Financial Services Authority Circular Letter No. SEOJK 24/SEOJK.03/2021. Meanwhile, the definition of "Claims that Have Impaired Value" are claims that have been identified as having decreased value, namely at stage 2 (unfavorable assets) and stage 3 (unfavorable assets). There are also "Claims that are past due (more than 90 days), which are not considered to have decreased in value." This can happen if there are claims that meet "Paid Claims" but are still at stage 1.

As a form of commitment to the convergence of International Financial Reporting Standards (IFRS), the Financial Accounting Standards Board of the Indonesian Accountants Association (DSAK IAI) has ratified PSAK 109 concerning Financial Assets. PSAK 109 was ratified by adopting IFRS 9, which contains the concept of calculating future credit losses (ECL). The model development process at BNI has been carried out by the model development team and validated by external and internal validators. The ECL determination is classified for each segment with the aim of classifying debtors who have similar characteristics so that a more accurate Probability of Default (PD) projection used in the ECL calculation is obtained.

The model used in forming bank CKPN is:
- The transition matrix model is a modeling method that uses changes in the quality of productive assets in a certain period as its basis.
- The Bayesian Scalar Model is a PD calculation model for assets that have an internal rating.
- The Vasicek model is applied for segmentation that relies on external ratings in the modeling process.

The CKPN calculation for assets classified as Amortized Cost will be calculated using different forward-looking horizons according to each risk level (staging), namely for the next 12 months for stage 1 (performing), as well as over the life of the claim (lifetime) for stage 2 (under performing) and stage 3 (non-performing). Stage is determined by the presence of a Significant Increase in Credit Risk (SICR), and also debtor staging is determined based on a combination of:
1. Internal Rating
2. External Rating
3. Historical Restructuring
4. Determination of Interest

B. QUANTITATIVE

Disclosure of Net Receivables by Region

1) Disclosure of Net Receivables by Region - Bank Only

No.	Portfolio Category	December 31, 2024					
		Net Receivables by Region					
		Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Office Overseas	Total
a	b	c	d	e	f	g	h
1	Government Receivables	-	-	785	184,109,560	33,143,596	217,253,942
2	Public Sector Entities Receivables	12,322,735	1,402,504	17,535,577	84,741,113	252,632	116,254,562
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	1,068,538	300,235	600,519	55,819,668	17,723,021	75,511,980
5	Receivables in the form of Covered Bond	-	-	-	-	-	-
6	Securities Companies and Other Financial Services Institutions Receivables	11,751	30,780	127,865	22,591,270	-	22,761,666
7	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	-	-	-	125,414	-	125,414
8	Loans Secured by Residential Property	16,034,236	13,893,589	26,430,354	12,387,584	1,277	68,747,040
9	Loans Secured by Commercial Real Estat	2,483,944	1,800,790	4,705,684	948,387	121	9,938,925
10	Loan by Land Acquisition, Land Processing and Construction	20,714	64,163	37,933	3,574	-	126,384
11	Loan by Employee or Pensioner	18,157	12,289	41,048	23,693	589	95,776
12	Micro Business, Small Business, and Retail Portfolio Receivables	30,727,844	27,142,642	43,117,273	49,463,919	5,318	150,456,996
13	Corporate Receivables	86,920,107	51,892,889	76,481,853	171,093,620	30,243,183	416,631,652
14	Past Due Receivables	851,162	671,850	2,730,336	1,461,537	528,666	6,243,552
15	Other Assets	3,404,335	2,529,343	4,737,764	46,828,647	779,439	58,279,529
	Total	**153,863,523**	**99,741,074**	**176,546,991**	**629,597,988**	**82,677,842**	**1,142,427,417**

(in million Rupiah)

	December 31, 2023					
	Net Receivables by Region					
	Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Office Overseas	Total
	i	j	k	l	m	n
	-	-	10,345	226,326,889	27,678,094	254,015,328
	11,434,375	1,308,638	20,806,057	70,021,961	227,344	103,798,375
	-	-	-	-	-	-
	670,248	354,096	628,267	45,942,961	15,913,201	63,508,773
	-	-	-	-	-	-
	8,191	38,478	155,214	23,088,299	-	23,290,182
	-	-	-	110,096	-	110,096
	14,549,071	13,393,179	23,613,009	9,934,487	422	61,490,168
	2,128,545	1,034,211	4,109,018	741,266	125	8,013,165
	27,607	63,461	28,442	562	-	120,072
	26,323	16,728	57,339	31,595	1,479	133,463
	27,780,613	26,511,455	45,361,621	43,066,803	1,965	142,722,456
	81,406,864	36,104,775	71,854,405	160,245,553	27,723,485	377,335,082
	714,242	605,627	2,026,043	1,136,865	292,803	4,775,579
	3,212,305	2,508,589	4,591,192	44,899,812	606,977	55,818,874
	141,958,384	**81,939,237**	**173,240,952**	**625,547,149**	**72,445,895**	**1,095,131,617**

2) Disclosure of Net Receivables by Region - Bank Consolidated with Subsidiaries

No.	Portfolio Category	December 31, 2024					
		Net Receivables by Region					
		Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Office Overseas	Total
a	b	c	d	e	f	g	h
1	Government Receivables	-	-	785	189,119,165	33,143,596	222,263,546
2	Public Sector Entities Receivables	12,322,735	1,402,504	17,535,577	84,741,113	252,632	116,254,562
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	1,102,247	300,235	607,766	58,172,922	17,723,021	77,906,191
5	Receivables in the form of Covered Bond	-	-	-	-	-	-
6	Securities Companies and Other Financial Services Institutions Receivables	11,751	30,780	127,865	22,928,960	-	23,099,356
7	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	-	-	-	748,360	-	748,360
8	Loans Secured by Residential Property	16,093,555	13,893,589	26,528,258	13,051,092	1,277	69,567,770
9	Loans Secured by Commercial Real Estat	2,569,429	1,800,790	5,348,553	4,251,399	121	13,970,291
10	Loan by Land Acquisition, Land Processing and Construction	20,714	64,163	37,933	3,574	-	126,384
11	Loan by Employee or Pensioner	18,157	12,289	41,048	23,693	589	95,776
12	Micro Business, Small Business, and Retail Portfolio Receivables	30,755,423	27,142,642	43,125,823	55,248,729	5,318	156,277,934
13	Corporate Receivables	86,935,034	51,892,889	76,684,309	175,441,797	30,243,183	421,197,211
14	Past Due Receivables	851,177	671,850	2,730,543	1,462,956	528,666	6,245,192
15	Other Assets	3,404,335	2,529,343	4,737,764	47,863,388	779,439	59,314,270
	Total	**154,084,556**	**99,741,074**	**177,506,223**	**653,057,148**	**82,677,842**	**1,167,066,842**

(in million Rupiah)

	December 31, 2023					
	Net Receivables by Region					
	Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Office Overseas	Total
	i	j	k	l	m	n
	-	-	10,345	233,518,357	27,678,094	261,206,796
	11,434,375	1,308,638	20,806,057	70,021,961	227,344	103,798,376
	-	-	-	-	-	-
	675,136	354,096	642,968	47,754,160	15,913,201	65,339,561
	-	-	-	-	-	-
	8,191	38,478	155,214	23,501,986	-	23,703,869
	-	-	-	11,948,126	-	11,948,126
	14,571,774	13,393,179	23,697,158	10,442,135	422	62,104,668
	2,177,376	1,034,211	4,388,488	2,646,743	125	10,246,943
	27,607	63,461	28,442	562	-	120,072
	26,323	16,728	57,339	31,595	1,479	133,464
	27,801,099	26,511,455	45,363,809	45,385,811	1,965	145,064,139
	81,413,559	36,104,775	71,862,899	162,411,158	27,723,485	379,515,876
	714,254	605,627	2,028,568	1,142,702	292,803	4,783,954
	3,212,305	2,508,589	4,591,192	46,566,905	606,977	57,485,968
	142,061,999	**81,939,237**	**173,632,479**	**655,372,201**	**72,445,895**	**1,125,451,811**

Disclosure of Net Receivables by Economic Sector

1) Disclosure of Net Receivables by Economic Sector - Bank Only

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
a	b	c	d	e	f	g	h	
	December 31, 2024							
1	Agriculture, Forestry, and Fisheries	-	6,613,154	-	-	-	-	
2	Mining and Extracting	-	3,295,440	-	-	-	-	
3	Processing Industry	-	11,026,822	-	-	-	-	
4	Electricity, Gas, Hot Water and Cold Water	-	8,740,803	-	-	-	-	
5	Water Management, Waste Management, Garbage Management and Recycling	-	-	-	-	-	-	
6	Construction	-	18,679,143	-	-	-	-	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	-	19,853,423	-	-	-	-	
8	Transportation & Warehousing	-	8,944,218	-	-	-	-	
9	Accommodation and Restaurants	-	-	-	-	-	-	
10	Information and Communications	-	4,176,020	-	-	-	-	
11	Finance and Insurance Activities	-	7,919,390	-	75,511,980	-	22,761,666	
12	Real Estate	-	179,999	-	-	-	-	
13	Professional, Science, and Technical Activities	-	56,113	-	-	-	-	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	781,160	-	-	-	-	
15	Government, Defense, and Mandatory Social Security Administration	217,253,942	-	-	-	-	-	
16	Education	-	-	-	-	-	-	
17	Human Health and Social Activities	-	-	-	-	-	-	
18	Arts, Entertainment, and Recreation	-	-	-	-	-	-	
19	Other Services Activities	-	-	-	-	-	-	

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	i	j	k	l	m	n	o	p	q
	-	319,377	523,018	-	-	6,910,141	32,755,788	399,750	-
	-	64,347	11,656	-	-	422,398	46,888,910	96,920	-
	-	739,596	592,462	-	-	5,017,545	121,259,755	1,596,233	-
	-	19,933	6,983	-	-	123,061	22,271,932	11,161	-
	-	5,283	4,810	-	-	81,923	274,462	2,548	-
	-	254,865	100,273	126,384	-	2,242,783	31,003,021	137,408	-
	-	5,076,309	3,347,718	-	-	36,304,902	37,521,753	1,638,965	-
	-	244,609	160,457	-	-	2,724,648	17,713,644	298,799	-
	-	420,587	1,115,284	-	-	2,782,526	12,617,503	185,089	-
	-	36,057	6,925	-	-	203,695	20,225,737	39,747	-
	-	3,065	-	-	-	73,304	8,539,128	534	-
	-	108,013	205,093	-	-	906,757	18,794,183	35,761	-
	-	23,723	4,619	-	-	162,435	455,956	7,019	-
	-	148,986	69,453	-	-	1,448,011	4,702,364	155,150	-
	-	-	-	-	-	9,506	2,154	9	-
	-	8,244	15,340	-	-	184,828	361,464	2,729	-
	-	96,497	58,627	-	-	609,176	2,159,295	12,371	-
	-	16,868	14,561	-	-	258,956	403,911	5,968	-
	-	134,215	182,662	-	-	930,305	239,025	2,468	-

1) Disclosure of Net Receivables by Economic Sector - Bank Only

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
20	Household Activities as Employer: Activities that produce goods and services by households that are used to meet their own needs	-	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	-	
22	Household	-	-	-	-	-	-	
23	Non-Business	-	25,988,877	-	-	-	-	
24	Others	-	-	-	-	-	-	
	Total	**217,253,942**	**116,254,562**	**-**	**75,511,980**	**-**	**22,761,666**	

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
a	b	c	d	e	f	g	h	
	December 31, 2023							
1	Agriculture, Forestry, and Fisheries	-	7,376,252	-	-	-	-	
2	Mining and Extracting	-	100,199	-	-	-	-	
3	Processing Industry	-	11,595,646	-	-	-	-	
4	Electricity, Gas, Hot Water and Cold Water	-	6,173,022	-	-	-	-	
5	Water Management, Waste Management, Garbage Management and Recycling	-	-	-	-	-	-	
6	Construction	-	21,215,205	-	-	-	-	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	-	15,957,504	-	-	-	-	
8	Transportation & Warehousing	-	6,974,048	-	-	-	-	

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	-	3,048	4,400	-	-	8,641	933	528	-
	-	-	-	-	-	8,062	-	382	-
	-	53,216,181	3,153,528	-	88,541	24,114,153	-	819,406	-
	-	7,807,240	361,055	-	7,235	64,929,241	38,440,734	794,606	-
	125,414	-	-	-	-	-	-	-	58,279,529
	125,414	**68,747,040**	**9,938,925**	**126,384**	**95,776**	**150,456,996**	**416,631,652**	**6,243,552**	**58,279,529**

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	i	j	k	l	m	n	o	p	q
	-	459,795	474,918	-	-	9,979,521	36,798,792	377,207	-
	-	59,726	7,320	-	-	307,933	43,354,460	141,670	-
	-	873,642	428,838	-	-	5,214,469	104,061,940	981,175	-
	-	15,014	10,233	-	-	130,844	23,539,606	10,757	-
	-	14,293	6,782	-	-	125,869	294,393	1,850	-
	-	265,005	59,930	120,072	-	1,722,999	23,358,786	267,411	-
	-	5,441,152	3,061,873	-	-	39,535,503	35,810,836	1,116,159	-
	-	368,961	103,806	-	-	2,278,343	15,680,211	175,585	-

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
9	Accommodation and Restaurants	-	-	-	-	-	-	
10	Information and Communications	-	5,788,061	-	-	-	-	
11	Finance and Insurance Activities	-	4,723,971	-	63,508,772	-	23,290,181	
12	Real Estate	-	212,449	-	-	-	-	
13	Professional, Science, and Technical Activities	-	49,827	-	-	-	-	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	1,361,101	-	-	-	-	
15	Government, Defense, and Mandatory Social Security Administration	241,784,178	-	-	-	-	-	
16	Education	-	-	-	-	-	-	
17	Human Health and Social Activities	-	-	-	-	-	-	
18	Arts, Entertainment, and Recreation	-	-	-	-	-	-	
19	Other Services Activities	-	-	-	-	-	-	
20	Household Activities as Employer: Activities that produce goods and services by households that are used to meet their own needs	-	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	-	
22	Household	-	-	-	-	-	-	
23	Non-Business	-	22,271,090	-	-	-	-	
24	Others	12,231,150	-	-	-	-	-	
	Total	**254,015,328**	**103,798,376**	**-**	**63,508,772**	**-**	**23,290,181**	

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	-	355,686	302,712	-	-	3,142,590	11,399,981	265,742	-
	-	31,178	6,762	-	-	282,047	15,194,783	4,453	-
	-	3,340	2,305	-	-	57,742	6,638,112	1,448	-
	-	60,867	86,766	-	-	921,962	16,802,043	143,754	-
	-	36,915	12,195	-	-	210,032	529,486	11,345	-
	-	185,462	56,862	-	-	1,571,470	4,925,845	111,685	-
	-	-	-	-	-	5,255	1,252	-	-
	-	11,854	20,777	-	-	199,327	416,132	1,149	-
	-	82,517	46,246	-	-	652,663	1,803,901	9,299	-
	-	15,622	10,345	-	-	164,121	150,064	661	-
	-	34,739	57,486	-	-	350,959	157,746	404	-
	-	3,968	1,172	-	-	17,768	1,502	252	-
	-	1,340	-	-	-	10,023	2,822	103	-
	-	47,258,235	2,995,767	-	123,257	20,158,582	9,794	653,498	-
	-	5,910,859	260,073	-	10,206	55,682,436	36,402,594	499,974	-
	110,096	-	-	-	-	-	-	-	55,818,874
	110,096	**61,490,167**	**8,013,166**	**120,072**	**133,463**	**142,722,456**	**377,335,082**	**4,775,579**	**55,818,874**

2) Disclosure of Net Receivables by Economic Sector - Bank Consolidated with Subsidiaries

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
a	b	c	d	e	f	g	h	
	December 31, 2024							
1	Agriculture, Forestry, and Fisheries	-	6,613,154	-	-	-	-	
2	Mining and Extracting	-	3,295,440	-	-	-	-	
3	Processing Industry	-	11,026,822	-	-	-	-	
4	Electricity, Gas, Hot Water and Cold Water	-	8,740,803	-	-	-	-	
5	Water Management, Waste Management, Garbage Management and Recycling	-	-	-	-	-	-	
6	Construction	-	18,679,143	-	-	-	-	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	-	19,853,423	-	-	-	-	
8	Transportation & Warehousing	-	8,944,218	-	-	-	-	
9	Accommodation and Restaurants	-	-	-	-	-	-	
10	Information and Communications	-	4,176,020	-	-	-	-	
11	Finance and Insurance Activities	-	7,919,390	-	77,906,191	-	23,036,903	
12	Real Estate	-	179,999	-	-	-	-	
13	Professional, Science, and Technical Activities	-	56,113	-	-	-	-	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	781,160	-	-	-	-	
15	Government, Defense, and Mandatory Social Security Administration	222,263,546	-	-	-	-	-	
16	Education	-	-	-	-	-	-	

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	i	j	k	l	m	n	o	p	q
	-	331,775	860,635	-	-	6,973,122	32,755,788	399,750	-
	-	69,642	31,209	-	-	423,042	46,888,910	96,920	-
	-	888,518	2,251,131	-	-	5,112,466	121,971,793	1,596,233	-
	-	19,933	189,307	-	-	124,700	22,271,932	11,161	-
	-	5,283	5,295	-	-	82,391	416,601	2,548	-
	-	286,369	189,144	126,384	-	2,252,021	31,008,351	137,408	-
	-	5,387,257	4,324,917	-	-	37,656,529	38,311,805	1,638,980	-
	-	253,898	163,165	-	-	2,767,036	18,118,195	299,244	-
	-	445,925	1,197,576	-	-	2,801,532	12,658,653	185,089	-
	-	36,811	77,613	-	-	204,690	20,349,054	39,747	-
	-	3,065	9,186	-	-	83,128	8,915,005	534	-
	-	109,049	484,174	-	-	907,559	19,003,549	36,223	-
	-	94,756	13,401	-	-	163,671	815,888	7,019	-
	-	168,536	130,054	-	-	1,448,813	4,763,037	155,150	-
	-	-	-	-	-	9,506	2,154	9	-
	-	8,244	19,694	-	-	184,828	361,464	2,729	-

2) Disclosure of Net Receivables by Economic Sector - Bank Consolidated with Subsidiaries

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
17	Human Health and Social Activities	-	-	-	-	-	-	
18	Arts, Entertainment, and Recreation	-	-	-	-	-	-	
19	Other Services Activities	-	-	-	-	-	-	
20	Household Activities as Employer: Activities that produce goods and services by households that are used to meet their own needs	-	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	-	
22	Household	-	-	-	-	-	-	
23	Non-Business	-	25,988,877	-	-	-	-	
24	Others	-	-	-	-	-	62,453	
	Total	**222,263,546**	**116,254,562**	**-**	**77,906,191**	**-**	**23,099,356**	

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
a	b	c	d	e	f	g	h	
	December 31, 2023							
1	Agriculture, Forestry, and Fisheries	-	7,376,252	-	-	-	-	
2	Mining and Extracting	-	100,199	-	-	-	-	
3	Processing Industry	-	11,595,646	-	-	-	-	
4	Electricity, Gas, Hot Water and Cold Water	-	6,173,022	-	-	-	-	
5	Water Management, Waste Management, Garbage Management and Recycling	-	-	-	-	-	-	
6	Construction	-	21,215,205	-	-	-	-	

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	-	117,665	58,627	-	-	616,683	2,159,295	12,371	-
	-	51,128	19,617	-	-	258,956	403,911	5,968	-
	-	157,436	193,218	-	-	946,823	561,857	2,468	-
	-	3,048	4,434	-	-	8,641	933	528	-
	-	-	-	-	-	8,062	-	382	-
	-	53,254,119	3,156,164	-	88,541	24,126,030	-	820,123	-
	-	7,807,240	361,055	-	7,235	68,962,579	38,440,734	794,606	-
	748,360	68,074	230,675	-	-	155,126	1,018,302	-	59,314,270
	748,360	**69,567,770**	**13,970,291**	**126,384**	**95,776**	**156,277,934**	**421,197,211**	**6,245,192**	**59,314,270**

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	i	j	k	l	m	n	o	p	q
	-	470,319	507,542	-	-	9,979,541	36,798,792	377,207	-
	-	85,051	11,657	-	-	307,938	43,354,460	141,668	-
	-	1,010,309	1,260,758	-	-	5,247,115	104,430,469	981,175	-
	-	15,014	10,233	-	-	130,851	23,539,606	10,757	-
	-	14,293	7,349	-	-	125,869	294,393	1,850	-
	-	303,249	94,248	120,072	-	1,725,482	23,409,060	272,635	-

No.	Economic Sectors	Government Receivables	Public Sector Entities Receivables	Development Banks and International Institutions Receivables	Bank Receivables	Receivables in the form of Covered Bond	Securities Companies and Other Financial Services Institutions Receivables	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	-	15,957,504	-	-	-	-	
8	Transportation & Warehousing	-	6,974,048	-	-	-	-	
9	Accommodation and Restaurants	-	-	-	-	-	-	
10	Information and Communications	-	5,788,061	-	-	-	-	
11	Finance and Insurance Activities	-	4,723,971	-	65,339,560	-	23,703,868	
12	Real Estate	-	212,449	-	-	-	-	
13	Professional, Science, and Technical Activities	-	49,827	-	-	-	-	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	1,361,101	-	-	-	-	
15	Government, Defense, and Mandatory Social Security Administration	248,975,646	-	-	-	-	-	
16	Education	-	-	-	-	-	-	
17	Human Health and Social Activities	-	-	-	-	-	-	
18	Arts, Entertainment, and Recreation	-	-	-	-	-	-	
19	Other Services Activities	-	-	-	-	-	-	
20	Household Activities as Employer: Activities that produce goods and services by households that are used to meet their own needs	-	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	-	
22	Household	-	-	-	-	-	-	
23	Non-Business	-	22,271,090	-	-	-	-	
24	Others	12,231,150	-	-	-	-	-	
	Total	**261,206,796**	**103,798,376**	**-**	**65,339,560**	**-**	**23,703,868**	

(in million Rupiah)

	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	Loans Secured by Residential Property	Loans Secured by Commercial Real Estat	Loan by Land Acquisition, Land Processing and Construction	Loan by Employee or Pensioner	Micro Business, Small Business, and Retail Portfolio Receivables	Corporate Receivables	Past Due Receivables	Other Assets
	-	5,652,598	3,664,638	-	-	40,321,588	36,324,301	1,116,665	-
	-	377,193	108,905	-	-	2,307,414	16,090,511	175,585	-
	-	373,492	574,359	-	-	3,147,729	11,402,046	265,742	-
	-	44,071	153,566	-	-	283,511	15,211,300	4,453	-
	-	3,340	6,746	-	-	57,742	6,638,112	1,448	-
	-	61,388	133,837	-	-	922,764	16,952,922	146,182	-
	-	96,686	22,610	-	-	211,405	873,970	11,345	-
	-	198,560	92,623	-	-	1,571,555	5,096,224	111,685	-
	-	-	-	-	-	5,255	1,252	-	-
	-	11,854	23,456	-	-	199,327	416,132	1,149	-
	-	82,517	46,389	-	-	652,663	1,803,901	9,299	-
	-	15,622	10,345	-	-	164,121	150,064	661	-
	-	34,923	63,750	-	-	352,982	158,474	404	-
	-	3,968	1,222	-	-	17,768	1,502	263	-
	-	1,340	-	-	-	10,023	2,822	103	-
	-	47,286,126	2,997,790	-	123,257	20,171,182	9,794	653,705	-
	-	5,962,755	454,919	-	10,206	57,150,315	36,402,594	499,974	-
	11,948,126	-	-	-	-	-	153,176	-	57,485,967
	11,948,126	**62,104,668**	**10,246,943**	**120,072**	**133,463**	**145,064,140**	**379,515,877**	**4,783,955**	**57,485,967**

Disclosure of Net Receivables by Remaining Contract Term

1) Disclosure of Net Receivables by Remaining Contract Term - Bank Only

No.	Portofolio Category	December 31, 2024					
		Net Receivables by Remaining Contract Term					
		< 1 year	> 1 year until 3 years	> 3 years until 5 years	> 5 years	Non-Contractual	Total
a	b	c	d	e	f	g	h
1	Government Receivables	25,273,574	41,421,801	35,440,947	61,289,159	53,828,461	217,253,942
2	Public Sector Entities Receivables	50,034,683	12,999,868	8,052,088	36,207,916	8,960,007	116,254,562
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	46,566,369	3,590,455	2,711,204	1,289,860	21,354,092	75,511,980
5	Receivables in the form of Covered Bond	-	-	-	-	-	-
6	Securities Companies and Other Financial Services Institutions Receivables	2,798,033	12,435,616	5,910,751	1,617,266	-	22,761,666
7	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	-	-	-	-	125,414	125,414
8	Loans Secured by Residential Property	5,217,740	3,110,362	6,845,205	53,573,733	-	68,747,040
9	Loans Secured by Commercial Real Estat	1,569,397	1,938,992	2,497,436	3,933,099	-	9,938,925
10	Loan by Land Acquisition, Land Processing and Construction	99,476	24,896	2,012	-	-	126,384
11	Loan by Employee or Pensioner	3,867	4,929	9,664	77,316	-	95,776
12	Micro Business, Small Business, and Retail Portfolio Receivables	40,509,721	31,533,955	32,823,086	43,108,963	2,481,271	150,456,996
13	Corporate Receivables	156,763,120	46,497,902	97,380,409	111,535,677	4,454,544	416,631,652
14	Past Due Receivables	2,612,576	1,706,728	426,478	1,497,770	-	6,243,552
15	Other Assets	-	-	-	-	58,279,529	58,279,529
	Total	**331,448,555**	**155,265,505**	**192,099,280**	**314,130,759**	**149,483,317**	**1,142,427,417**

(in million Rupiah)

	December 31, 2023					
	Net Receivables by Remaining Contract Term					
	< 1 year	> 1 year until 3 years	> 3 years until 5 years	> 5 years	Non-Contractual	Total
	i	j	k	l	m	n
	72,513,655	37,058,346	26,501,624	51,439,414	66,502,289	254,015,328
	46,055,892	11,657,090	11,053,797	34,733,734	297,863	103,798,376
	-	-	-	-	-	-
	43,718,664	6,557,927	1,649,606	1,570,296	10,012,279	63,508,772
	-	-	-	-	-	-
	586,571	10,883,127	7,501,429	4,319,055	-	23,290,182
	-	-	-	-	110,096	110,096
	6,044,346	2,606,302	5,774,177	47,065,343	-	61,490,168
	1,239,494	1,664,589	2,074,955	3,034,128	-	8,013,166
	113,002	4,979	2,091	-	-	120,072
	4,573	8,704	10,776	109,411	-	133,464
	34,531,251	34,511,177	33,575,028	38,437,218	1,667,782	142,722,456
	145,498,314	44,055,207	85,604,840	98,932,643	3,244,077	377,335,081
	1,848,325	803,594	844,994	1,278,666	-	4,775,579
	-	-	-	-	55,818,874	55,818,874
	352,154,087	**149,811,042**	**174,593,317**	**280,919,908**	**137,653,260**	**1,095,131,612**

2) Disclosure of Net Receivables by Remaining Contract Term - Bank Consolidated with Subsidiaries

No,	Portofolio Category	December 31, 2024					
		Net Receivables by Remaining Contract Term					
		< 1 year	> 1 year until 3 years	> 3 years until 5 years	> 5 years	Non-Contractual	Total
a	b	c	d	e	f	g	h
1	Government Receivables	27,368,236	41,558,134	35,440,947	61,360,947	56,535,281	222,263,546
2	Public Sector Entities Receivables	50,034,683	12,999,868	8,052,088	36,207,916	8,960,007	116,254,562
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	46,677,766	3,598,739	2,728,494	1,306,279	23,594,912	77,906,191
5	Receivables in the form of Covered Bond	-	-	-	-	-	-
6	Securities Companies and Other Financial Services Institutions Receivables	2,928,298	12,538,678	5,991,808	1,640,571	-	23,099,356
7	Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments	-	-	-	-	748,360	748,360
8	Loans Secured by Residential Property	5,761,082	3,191,548	6,902,801	53,637,116	75,224	69,567,770
9	Loans Secured by Commercial Real Estat	3,576,799	2,189,781	2,786,536	5,186,500	230,675	13,970,291
10	Loan by Land Acquisition, Land Processing and Construction	99,476	24,896	2,012	-	-	126,384
11	Loan by Employee or Pensioner	3,867	4,929	9,664	77,316	-	95,776
12	Micro Business, Small Business, and Retail Portfolio Receivables	41,914,902	31,646,834	32,850,671	43,502,054	6,363,472	156,277,934
13	Corporate Receivables	159,273,381	46,903,164	97,683,300	112,103,992	5,233,373	421,197,211
14	Past Due Receivables	2,613,072	1,707,194	426,694	1,497,770	462	6,245,192
15	Other Assets	-	-	-	-	59,314,270	59,314,270
	Total	**340,251,563**	**156,363,765**	**192,875,016**	**316,520,462**	**161,056,035**	**1,167,066,842**

(in million Rupiah)

	December 31, 2023					
	Net Receivables by Remaining Contract Term					
	< 1 year	> 1 year until 3 years	> 3 years until 5 years	> 5 years	Non-Contractual	Total
	i	j	k	l	m	n
	78,341,048	37,325,510	26,517,007	51,503,524	67,519,706	261,206,795
	46,055,892	11,657,090	11,053,797	34,733,734	297,863	103,798,376
	-	-	-	-	-	-
	44,438,990	6,677,116	1,658,143	1,575,184	10,990,128	65,339,561
	-	-	-	-	-	-
	786,446	10,957,899	7,620,469	4,319,055	20,000	23,703,869
	-	-	-	-	11,948,126	11,948,126
	6,469,011	2,679,476	5,782,708	47,121,578	51,896	62,104,669
	2,101,668	1,880,297	2,182,194	3,887,929	194,854	10,246,942
	113,002	4,979	2,091	-	-	120,072
	4,573	8,704	10,776	109,411	-	133,464
	35,294,359	34,589,143	33,601,807	38,443,237	3,135,593	145,064,139
	146,984,456	44,354,061	85,809,071	99,124,211	3,244,077	379,515,876
	1,849,597	805,165	850,247	1,278,687	257	4,783,953
	-	-	-	-	57,485,967	57,485,967
	362,439,042	**150,939,440**	**175,088,310**	**282,096,550**	**154,888,467**	**1,125,451,809**

Disclosure of Receivables and Allowances by Region

1) Disclosure of Receivables and Allowances by Region - Bank Only

No.	Portfolio Category	December 31, 2024					
		Region					
		Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Overseas Office	Total
a	b	c	d	e	f	g	h
1	Receivables	163,115,806	103,602,518	194,782,081	670,577,895	86,291,139	1,218,369,440
2	Impaired Receivables						
	a. Not Yet Due	11,475,974	3,815,891	16,236,902	40,354,901	-	71,883,667
	b. Past due	2,260,923	1,643,832	6,824,341	6,306,039	277,419	17,312,555
3	Allowances for Impairment Losses - Stage 1	883,537	732,123	1,167,011	2,171,796	189,514	5,143,980
4	Allowances for Impairment Losses - Stage 2	1,800,338	956,794	2,983,974	10,982,436	-	16,723,542
5	Allowances for Impairment Losses - Stage 3	2,120,605	1,010,585	6,733,408	8,512,517	67,759	18,444,875
6	Written-off Receivables	1,730,025	1,802,753	8,046,289	6,475,832	613,917	18,668,815

2) Disclosure of Receivables and Allowances by Region - Bank Consolidated with Subsidiaries

No.	Portfolio Category	December 31, 2024					
		Region					
		Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Overseas Office	Total
a	b	c	d	e	f	g	h
1	Receivables	163,353,616	103,602,518	195,773,511	724,889,386	86,291,139	1,273,910,170
2	Impaired Receivables						
	a. Not Yet Due	11,490,388	3,815,891	16,253,324	40,440,869	-	72,000,471
	b. Past due	2,277,357	1,643,832	6,854,443	6,344,145	277,419	17,397,196
3	Allowances for Impairment Losses - Stage 1	884,922	732,123	1,172,608	2,281,983	189,514	5,261,149
4	Allowances for Impairment Losses - Stage 2	1,801,804	956,794	2,984,847	11,032,874	-	16,776,319
5	Allowances for Impairment Losses - Stage 3	2,137,024	1,010,585	6,769,524	8,646,233	67,759	18,631,126
6	Written-off Receivables	1,730,025	1,802,753	8,046,289	6,475,832	613,917	18,668,815

(in million Rupiah)

	December 31, 2023					
	Region					
	Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Overseas Office	Total
	i	j	k	l	m	n
	152,538,579	86,471,551	194,780,409	696,792,977	77,872,524	1,208,456,040
	13,067,363	4,594,862	21,497,011	55,107,842	1,006,874	95,273,951
	2,644,302	1,610,719	6,387,370	6,549,388	145,596	17,337,375
	854,709	703,768	1,111,441	1,958,359	216,206	4,844,485
	2,218,980	1,245,444	3,117,054	12,938,960	161,415	19,681,853
	2,664,202	1,110,346	10,703,386	10,044,501	351,331	24,873,766
	1,600,187	1,418,736	3,507,497	7,863,917	-	14,390,337

(in million Rupiah)

	December 31, 2023					
	Region					
	Sumatra and Kalimantan	Sulawesi, Bali & Nusa Tenggara and Papua	Java (Excl. Jakarta and Banten)	Jakarta & Banten	Overseas Office	Total
	i	j	k	l	m	n
	152,654,469	86,471,551	195,217,086	752,704,710	77,872,524	1,264,920,340
	13,097,598	4,594,862	21,524,877	55,424,706	1,006,874	95,648,918
	2,649,916	1,610,719	6,420,616	6,555,352	145,596	17,382,199
	855,279	703,768	1,113,598	2,014,992	216,206	4,903,844
	2,222,026	1,245,444	3,117,850	12,959,096	161,415	19,705,832
	2,674,064	1,110,346	10,749,630	10,138,139	351,331	25,023,510
	1,600,187	1,418,736	3,507,497	7,863,917	-	14,390,337

Disclosure of Receivables and Allowances by Economic Sectors

1) Disclosure of Receivables and Allowances by Economic Sectors - Bank Only (in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
a	b	c	d	e	f	g	h	i
December 31, 2024								
1	Agriculture, Forestry, and Fisheries	49,180,133	2,183,278	1,132,927	300,815	376,001	755,057	1,488,683
2	Mining and Extracting	51,704,587	5,692,552	149,675	90,882	973,178	70,672	252,992
3	Processing Industry	160,932,041	19,019,447	3,997,082	400,210	1,737,061	10,304,118	5,727,340
4	Electricity, Gas, Hot Water and Cold Water	32,151,571	780,955	33,662	76,661	57,320	22,502	239,567
5	Water Management, Waste Management, Garbage Management and Recycling	377,653	18,741	5,699	1,972	5,607	3,150	5,159
6	Construction	60,412,334	15,031,369	423,456	119,642	6,990,017	411,842	1,145,292
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	110,875,505	6,963,821	3,627,188	717,807	1,704,136	2,064,940	4,335,120
8	Transportation & Warehousing	33,237,176	5,175,146	1,560,591	138,438	1,686,094	1,291,050	382,883
9	Accommodation and Restaurants	18,160,722	2,016,064	784,282	130,116	322,843	632,093	670,430
10	Information and Communications	28,038,148	142,035	87,347	42,565	11,832	47,600	21,852
11	Finance and Insurance Activities	105,952,400	6,107	1,645	75,468	1,965	793	117,350
12	Real Estate	22,263,849	8,206,481	81,449	58,180	1,942,179	58,871	774,771
13	Professional, Scientific and Technical Activities	767,142	32,230	17,108	6,471	6,005	13,382	22,436
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	7,988,293	465,656	413,998	46,005	103,440	264,009	582,169
15	Government, Defense, and Mandatory Social Security Administration	219,102,642	-	16	1,063,508	-	7	2,962
16	Education	586,694	33,847	6,107	4,881	10,324	3,378	5,045
17	Human Health and Social Activities	3,032,428	72,530	30,024	21,258	20,273	17,652	21,895

1) Disclosure of Receivables and Allowances by Economic Sectors - Bank Only (in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
18	Arts, Entertainment, and Recreation	731,433	107,718	14,149	4,928	8,313	8,182	2,776
19	Other Services Activities	1,522,371	23,925	3,216	20,270	6,294	1,619	2,139
20	Household Activity as Employer	18,895	251	1,729	290	67	1,201	722
21	International Agencies and Other Extra-International Agencies Activities	8,712	-	665	119	-	283	498
22	Household	82,881,951	2,606,626	1,813,903	742,707	519,857	1,099,941	2,448,328
23	Non-Business	169,240,176	3,299,266	1,546,938	1,080,783	240,736	569,859	418,407
24	Others	59,202,586	5,621	1,579,699	-	-	802,674	-
Total		**1,218,369,440**	**71,883,667**	**17,312,555**	**5,143,980**	**16,723,542**	**18,444,875**	**18,668,815**

(in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
a	b	c	d	e	f	g	h	i
December 31, 2023								
1	Agriculture, Forestry, and Fisheries	57,070,903	3,011,633	882,221	449,964	440,427	813,157	806,999
2	Mining and Extracting	48,024,345	5,634,493	338,658	142,487	1,006,557	212,434	899,913
3	Processing Industry	148,262,813	22,571,237	3,940,861	558,481	1,839,861	14,411,305	2,426,581
4	Electricity, Gas, Hot Water and Cold Water	30,142,263	179,356	239,764	93,194	18,635	245,206	36,692
5	Water Management, Waste Management, Garbage Management and Recycling	465,773	38,995	3,832	3,086	12,283	1,982	3,376
6	Construction	56,940,007	16,806,227	1,232,125	131,639	7,243,670	1,078,258	1,402,258
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	109,255,168	9,451,602	3,053,243	600,553	1,947,119	2,290,152	4,088,154
8	Transportation & Warehousing	30,225,587	13,608,120	726,376	91,621	2,585,878	1,312,792	256,130
9	Accommodation and Restaurants	16,876,371	2,983,186	946,221	188,619	617,318	751,479	584,788
10	Information and Communications	21,315,320	168,719	10,840	31,245	37,186	6,386	110,564

(in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
11	Finance and Insurance Activities	99,097,600	289,702	119,574	142,590	30,813	118,126	-
12	Real Estate	21,365,107	8,927,007	645,641	82,386	2,349,874	525,596	347,324
13	Professional, Scientific and Technical Activities	936,955	73,475	30,130	7,151	11,703	21,447	16,546
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	9,049,816	733,406	514,976	39,754	156,776	481,714	338,876
15	Government, Defense, and Mandatory Social Security Administration	243,898,629	2,961	-	666,046	642	-	-
16	Education	729,253	236,101	2,282	2,812	76,138	1,133	9,630
17	Human Health and Social Activities	2,848,780	45,644	21,709	22,152	8,287	12,410	1,697
18	Arts, Entertainment, and Recreation	345,747	102,982	962	1,767	4,507	302	825
19	Other Services Activities	605,905	2,625	588	6,069	495	184	181,492
20	Household Activity as Employer	25,677	4,131	773	317	559	521	-
21	International Agencies and Other Extra-International Agencies Activities	14,763	852	150	102	137	47	341
22	Household	72,567,384	1,989,113	1,572,759	622,554	440,248	1,037,920	2,182
23	Non-Business	169,423,031	8,408,248	1,444,712	959,884	852,739	733,245	2,875,971
24	Others	68,968,842	4,135	1,608,978	12	-	817,969	-
Total		**1,208,456,040**	**95,273,951**	**17,337,375**	**4,844,485**	**19,681,853**	**24,873,766**	**14,390,337**

2) Disclosure of Receivables and Allowances by Economic Sectors - Bank Consolidated with Subsidiaries

(in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
a	b	c	d	e	f	g	h	i
December 31, 2024								
1	Agriculture, Forestry, and Fisheries	49,592,694	2,194,091	1,133,250	305,537	376,647	755,381	1,488,683
2	Mining and Extracting	51,730,846	5,697,411	149,691	90,976	974,097	70,688	252,992
3	Processing Industry	163,546,200	19,048,091	4,007,664	416,541	1,739,020	10,314,700	5,727,340
4	Electricity, Gas, Hot Water and Cold Water	32,334,109	780,977	33,669	78,547	57,325	22,508	239,567
5	Water Management, Waste Management, Garbage Management and Recycling	520,327	18,750	5,705	3,431	5,609	3,157	5,159
6	Construction	60,563,328	15,036,030	439,302	120,312	6,991,080	427,688	1,145,292
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	114,322,007	6,992,157	3,654,090	736,396	1,707,667	2,098,047	4,335,120
8	Transportation & Warehousing	33,696,577	5,175,146	1,562,696	142,693	1,686,094	1,292,710	382,883
9	Accommodation and Restaurants	18,330,601	2,042,285	784,305	131,156	322,858	634,976	670,430
10	Information and Communications	28,232,443	142,035	87,347	43,331	11,832	47,600	21,852
11	Finance and Insurance Activities	108,290,254	6,107	6,940	80,183	1,965	6,088	117,350
12	Real Estate	22,263,849	8,206,481	100,872	60,939	1,942,179	77,831	774,771
13	Professional, Scientific and Technical Activities	1,206,978	32,230	17,108	7,947	6,005	13,382	22,436
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	8,129,378	465,659	413,998	47,133	103,441	264,009	582,169
15	Government, Defense, and Mandatory Social Security Administration	223,353,297	-	16	1,063,508	-	7	2,962
16	Education	591,012	33,847	6,107	4,895	10,324	3,378	5,045
17	Human Health and Social Activities	3,061,067	72,530	30,024	21,464	20,273	17,652	21,895

2) Disclosure of Receivables and Allowances by Economic Sectors - Bank Consolidated with Subsidiaries

(in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
18	Arts, Entertainment, and Recreation	770,722	107,718	14,149	5,159	8,313	8,182	2,776
19	Other Services Activities	1,894,527	24,217	3,278	21,876	6,362	1,681	2,139
20	Household Activity as Employer	18,971	251	1,770	291	67	1,242	722
21	International Agencies and Other Extra-International Agencies Activities	8,712	-	665	119	-	283	498
22	Household	82,937,456	2,606,786	1,816,590	742,905	519,894	1,102,421	2,448,328
23	Non-Business	205,669,044	3,312,049	1,548,262	1,135,750	285,268	664,841	418,407
24	Others	62,845,769	5,621	1,579,699	65	-	802,674	-
Total		**1,273,910,170**	**72,000,471**	**17,397,196**	**5,261,149**	**16,776,319**	**18,631,126**	**18,668,815**

(in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
a	b	c	d	e	f	g	h	i
December 31, 2023								
1	Agriculture, Forestry, and Fisheries	57,114,249	3,022,083	882,221	450,141	440,924	813,157	806,999
2	Mining and Extracting	48,058,561	5,641,327	340,920	142,567	1,007,471	216,321	899,913
3	Processing Industry	149,628,359	22,607,701	3,940,861	566,856	1,842,092	14,411,305	2,426,581
4	Electricity, Gas, Hot Water and Cold Water	30,142,270	179,356	239,764	93,194	18,635	245,206	36,692
5	Water Management, Waste Management, Garbage Management and Recycling	466,336	38,995	3,832	3,092	12,283	1,982	3,376
6	Construction	57,083,914	16,823,657	1,237,823	132,129	7,244,639	1,091,491	1,402,258
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	111,394,399	9,473,290	3,068,431	609,435	1,947,776	2,315,452	4,088,154
8	Transportation & Warehousing	30,676,744	13,608,458	726,376	95,846	2,586,239	1,312,792	256,130
9	Accommodation and Restaurants	17,201,183	3,248,215	946,221	189,091	633,167	754,715	584,788

(in million Rupiah)

No.	Economic Sectors	Receivables	Impaired Receivables		Allowances for Impairment Losses - Stage 1	Allowances for Impairment Losses - Stage 2	Allowances for Impairment Losses - Stage 3	Written-off Receivables
			Not Yet Due	Already Due				
10	Information and Communications	21,491,964	168,719	10,840	32,045	37,186	6,386	110,564
11	Finance and Insurance Activities	100,403,352	295,938	126,023	145,402	33,185	124,575	-
12	Real Estate	21,584,989	8,934,663	660,168	83,335	2,349,874	544,833	347,324
13	Professional, Scientific and Technical Activities	1,351,854	73,475	30,130	8,474	11,703	21,447	16,546
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	9,268,296	733,406	514,976	41,320	156,776	481,714	338,876
15	Government, Defense, and Mandatory Social Security Administration	251,022,434	2,961	-	666,046	642	-	-
16	Education	731,910	236,101	2,282	2,821	76,138	1,133	9,630
17	Human Health and Social Activities	2,848,923	45,644	21,709	22,154	8,287	12,410	1,697
18	Arts, Entertainment, and Recreation	345,747	102,982	962	1,767	4,507	302	825
19	Other Services Activities	615,082	2,647	588	6,133	500	184	181,492
20	Household Activity as Employer	25,773	4,176	773	318	559	555	-
21	International Agencies and Other Extra-International Agencies Activities	14,763	852	150	102	137	47	341
22	Household	72,612,638	1,991,888	1,573,458	622,740	440,373	1,040,494	2,182
23	Non-Business	211,151,967	8,408,248	1,444,712	988,549	852,739	809,038	2,875,971
24	Others	69,684,634	4,135	1,608,978	288	-	817,969	-
Total		**1,264,920,341**	**95,648,917**	**17,382,198**	**4,903,845**	**19,705,832**	**25,023,508**	**14,390,339**

1) Disclosure of Receivables by Past Due Days - Bank Only

No.	Exposure Type	December 31, 2024			
		Receivables by Past Due Days			
		> 90 days until 120 days	> 120 days until 180 days	> 180 days	Total
a	b	c	d	e	f
1	Loan included in Past Due Receivables	1,135,521	2,401,620	7,840,994	11,378,135
2	Securities included in Past Due Receivables	316,989	-	-	316,989
Total		**1,452,510**	**2,401,620**	**7,840,994**	**11,695,124**

2) Disclosure of Net Receivables by Past Due Daays - Bank Consolidated with Subsidiaries

No.	Exposure Type	December 31, 2024			
		Receivables by Past Due Days			
		> 90 days until 120 days	> 120 days until 180 days	> 180 days	Total
a	b	c	d	e	f
1	Loan included in Past Due Receivables	1,138,807	2,401,784	7,922,186	11,462,777
2	Securities included in Past Due Receivables	316,989	-	-	316,989
Total		**1,455,796**	**2,401,784**	**7,922,186**	**11,779,766**

Additional Disclosures regarding Treatment of Troubled Assets (CRB-A)

A. QUALITATIVE

Non-performing assets are Assets categorized as "Substandard", "Doubtful", or "Loss". in accordance with POJK No.40/POJK.03/2019 concerning Asset Quality of Commercial Banks

Asset Restructuring is an improvement effort made by the Bank in lending activities against counterparties who have difficulty in fulfilling their liabilities. Criteria for Assets that are Restructured Assets are counterparties experiencing difficulties in the payment of principal and/or interest

(in million Rupiah)

	December 31, 2023			
	Receivables by Past Due Days			
	> 90 days until 120 days	> 120 days until 180 days	> 180 days	Total
	g	h	i	j
	1,098,798	2,586,571	8,374,097	12,059,467
	291,324	-	242,790	534,114
	1,390,122	**2,586,571**	**8,616,887**	**12,593,581**

(in million Rupiah)

	December 31, 2023			
	Receivables by Past Due Days			
	> 90 days until 120 days	> 120 days until 180 days	> 180 days	Total
	g	h	i	j
	1,100,803	2,586,925	8,443,151	12,130,878
	291,324	-	242,790	534,114
	1,392,127	**2,586,925**	**8,685,941**	**12,664,992**

B. QUANTITATIVE

Disclosure of Performing and Non-Performing Assets

1) Disclosure of Performing and Non-Performing Assets - Bank Only (in million Rupiah)

		December 31, 2024							
		Performing (Quality of L and DPLK)		Non Performing (Quality of KL, D, M)					
				Impaired Receivables		Not Impaired Receivables			
						Have Arrears > 90 Days		Have Arrears ≤ 90 Days	
		Gross Carrying Amount	Allowances for Impairment Losses	Bruto Gross Carrying Amount	Allowances for Impairment Losses	Bruto Gross Carrying Amount	Allowances for Impairment Losses	Bruto Gross Carrying Amount	Allowances for Impairment Losses
		a	b	c	d	e	f	g	h
1	Securities	127,184,192	35,872	-	-	316,989	-	-	-
2	Loan								
	a. Corporate	386,364,794	11,154,336	8,718,649	5,898,157	-	-	-	-
	b. Retail	136,200,201	3,440,838	3,695,202	1,921,243	-	-	-	-
3	Administrative Account Transactions	137,034,006	-	582,065	-	345,942	-	-	-

2) Disclosure of Performing and Non-Performing Assets - Bank Consolidated with Subsidiaries (in million Rupiah)

		December 31, 2024							
		Performing (Quality of L and DPLK)		Non Performing (Quality of KL, D, M)					
				Impaired Receivables		Not Impaired Receivables			
						Have Arrears > 90 Days		Have Arrears ≤ 90 Days	
		Gross Carrying Amount	Allowances for Impairment Losses	Bruto Gross Carrying Amount	Allowances for Impairment Losses	Bruto Gross Carrying Amount	Allowances for Impairment Losses	Bruto Gross Carrying Amount	Allowances for Impairment Losses
		a	b	c	d	e	f	g	h
1	Securities	130,273,925	35,875	-	-	316,989	-	-	-
2	Loan								
	a. Corporate	393,056,151	11,198,145	8,718,649	5,898,157	-	-	-	-
	b. Retail	143,896,020	3,670,956	3,779,844	2,004,721	-	-	-	-
3	Administrative Account Transactions	140,956,448	-	582,065	-	345,942	-	-	-

Disclosure of Performing and Non-Performing Assets

1) Disclosure of Performing and Non-Performing Assets - Bank Only (in million Rupiah)

		December 31, 2023									
		Performing (Quality of L and DPLK)		Non Performing (Quality of KL, D, M)		Stage 1		Stage 2		Stage 3	
		Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses
		a	b	c	d	e	f	g	h		
1	Securities	-	-	-	-	-	-	-	-	-	-
2	Loan										
	a. Corporate	29,382,960	9,233,176	4,919,692	3,188,142	1,101,882	24,465	23,528,156	5,542,235	9,672,614	6,854,618
	b. Retail	4,530,848	878,126	1,436,813	727,379	775,257	16,487	3,681,772	818,527	1,510,631	770,490
3	Administrative Account Transactions	2,281,272	-	17,579	-	1,821,151	-	464,920	-	12,779	-

2) Disclosure of Performing and Non-Performing Assets - Bank Consolidated with Subsidiaries (in million Rupiah)

		December 31, 2023									
		Performing (Quality of L and DPLK)		Non Performing (Quality of KL, D, M)		Stage 1		Stage 2		Stage 3	
		Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses	Gross Carrying Amount	Allowances for Impairment Losses
		a	b	c	d	e	f	g	h		
1	Securities	-	-	-	-	-	-	-	-	-	-
2	Loan										
	a. Corporate	29,434,198	9,237,013	4,919,692	3,188,142	1,101,882	24,465	23,553,235	5,543,212	9,698,772	6,857,478
	b. Retail	4,565,356	883,847	1,483,543	773,939	785,724	16,576	3,698,839	820,754	1,564,337	820,456
3	Administrative Account Transactions	2,281,272	-	17,579	-	1,821,151	-	464,920	-	12,779	-

Quantitative Disclosures related to MRK Techniques Qualitative (CRC)

Description	Definition
Collateral revaluation policy	In calculating Risk-Weighted Assets for Credit Risk (ATMR Credit) using the Standardized Approach, the Bank may recognize collateral, guarantees, credit insurance, or other credit risk mitigation (CRM) techniques to reduce the value of ATMR Credit. The use of collateral-based CRM techniques may include cash deposited with the funding bank, demand deposits, savings,or time deposits issued by the funding bank, gold stored at the funding bank, Government Securities (SUN) issued by the Government of the Republic of Indonesia, including government bonds and treasury bills as defined under the relevant Government Securities Law, State Sharia Securities (SBSN) as defined under the State Sharia Securities Law, Bank Indonesia Certificates (SBI) and Sharia Bank Indonesia Certificates (SBIS), and Rated securities assessed by a credit rating agency recognized by the Financial Services Authority (OJK). For guarantee-based CRM techniques, only guarantees issued by entities classified under the Government of Indonesia, foreign governments, multilateral development banks, international institutions, banks, securities companies, and other financial institutions are recognized. For credit risk mitigation through insurance or guarantees, banks may utilize credit guarantees from guarantee institutions or credit insurance provided by licensed insurance companies. CRM techniques can be recognized only if they meet the criteria and requirements set out in SEOJK No. 24/SEOJK.03/2021 on Credit Risk ATMR Calculation. Collateral held by banks is subject to regular reviews, with a minimum frequency of once every 24 months for debtors classified as quality 1 and 2, and at least once every 12 months for loans classified as quality 3, 4, and 5.

Disclosure on Use of External Credit Ratings (CRD)

The Bank utilizes rating agencies in accordance with the provisions of rating institutions based on SEOJK 24/SEOJK.03/2021, namely Pefindo and Fitch Ratings Indonesia for IDR-denominated ratings, as well as S&P, Moody's, and Fitch International for ratings in currencies other than IDR. The portfolio categories that require ratings include Claims on Sovereign, Claims on Public Sector Entity, Claims on Banks, Claims on Securities Companies and Other Financial Institutions, and Claims on Corporates.

Quantitative Disclosures related to MRK Techniques

1) Quantitative Disclosures related to MRK Techniques - Bank Only (in million Rupiah)

		December 31, 2024				
		Not Guaranteed Receivables Using MRK Techniques	Guaranteed Receivables Using MRK Techniques	Guaranteed Receivables by Collateral	Guaranteed Receivables by Guarantee, Security and/ or Credit Insurance	Receivables Secured by Credit Derivatives
		a	b	c	d	e
1	Loan	689,531,252	33,690,454	3,922,153	29,768,301	
2	Securities	127,465,308	-	-	-	
3	**Total**	**816,996,560**	**33,690,454**	**3,922,153**	**29,768,301**	
4	Past Due Loan and Securities	5,636,112	532,100	2,738	529,362	

2) Quantitative Disclosures related to MRK Techniques - Bank Consolidated with Subsidiaries (in million Rupiah)

		December 31, 2024				
		Not Guaranteed Receivables Using MRK Techniques	Guaranteed Receivables Using MRK Techniques	Guaranteed Receivables by Collateral	Guaranteed Receivables by Guarantee, Security and/ or Credit Insurance	Receivables Secured by Credit Derivatives
		a	b	c	d	e
1	Loan	701,962,459	35,237,657	5,469,357	29,768,301	
2	Securities	130,555,039	-	-	-	
3	**Total**	**832,517,497**	**35,237,657**	**5,469,357**	**29,768,301**	
4	Past Due Loan and Securities	5,721,264	532,100	2,738	529,362	

Disclosure of Credit Risk Exposure and Impact of MRK Techniques

1) Disclosure of Credit Risk Exposure and Impact of MRK Techniques - Bank Only

(in million Rupiah)

	Portfolio Category	December 31, 2024					
		Net Receivables Before Implementation of FKK and MRK Techniques		Net Receivables After Implementation of FKK and MRK Techniques		RWA and Average Risk Weight	
		Statement of Financial Position	TRA	Statement of Financial Position	TRA	RWA	Average Risk Weight (e/(c+d))
		a	b	c	d	e	f
1	Government Receivables	215,624,730	6,061,746	215,433,956	1,629,211	225,019	0.1%
2	Public Sector Entities Receivables	106,420,219	22,011,551	98,660,355	9,834,343	47,300,591	43.6%
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	0.0%
4	Bank Receivables	62,218,644	24,893,021	56,190,025	13,293,336	26,536,103	38.2%
	Securities Companies and Other Financial Services Institutions Receivables[1)]	22,655,436	174,256	22,640,563	106,230	15,703,894	69.0%
5	Receivables in the form of Covered Bond	-	-	-	-	-	0.0%
6	Corporate Receivables - General Corporate Exposure[2)]	362,232,546	40,510,611	360,917,046	18,064,240	343,263,531	90.6%
	Securities Companies and Other Financial Services Institutions Receivables[3)]	-	-	-	-	-	0.0%
	Special Financing Exposure[4)]	36,334,866	-	36,334,866	-	33,342,596	91.8%
7	Receivables in the form of Securities/Subordinated Receivables, Equity and Other Capital Instruments	125,414	-	125,414	-	283,534	226.1%
8	Micro Business, Small Business, and Retail Portfolio Receivables	137,810,302	42,856,024	116,805,627	12,646,694	103,227,950	79.7%
9	Loans Secured by Real Estate	-	-	-	-	-	0.0%
	Loans Secured by Residential Property which the payments Are Not Materially Dependent on Property Cash Flow	68,667,295	675,278	68,179,341	67,528	33,853,192	49.6%
	Loans Secured by Residential Property which the payments Are Materially Dependent on Property Cash Flow	12,213	46	10,841	5	9,951	91.8%
	Commercial Property Backed Loans whose Payments are Not Materially Dependent on Property Cash Flows	9,787,460	156,893	7,251,870	15,689	6,243,397	85.9%
	Commercial Property Backed Loans whose Payments are Materially Dependent on Property Cash Flows	135,776	-	110,137	-	116,781	106.0%
10	Loan by Land Acquisition, Land Processing and Construction	125,969	4,154	125,684	415	126,157	100.0%

(in million Rupiah)

	Portfolio Category	December 31, 2024					
		Net Receivables Before Implementation of FKK and MRK Techniques		Net Receivables After Implementation of FKK and MRK Techniques		RWA and Average Risk Weight	
		Statement of Financial Position	TRA	Statement of Financial Position	TRA	RWA	Average Risk Weight (e/(c+d))
11	Past Due Receivables	6,181,709	618,434	5,649,609	61,843	4,858,204	85.1%
12	Other Assets	58,279,529	-	58,279,529	-	45,061,483	77.3%
Total		**1,086,612,106**	**137,962,012**	**1,046,714,863**	**55,719,535**	**660,152,383**	**59.9%**

1) Represents receivables included in the Securities Companies and Other Financial Services Institutions Receivables Portfolio Category as in Appendix A of this FSA Circular Letter.
2) Represents receivables that are included in the scope of Corporate Receivables - general corporate exposure Portfolio Category as in Appendix A of this FSA Circular Letter (excluding numbers 3) and numbers 4)).
3) Represents Securities Companies and Other Financial Services Institutions Receivables that are not included in the Portfolio Category as in number 1).
4) Represents receivables that fall within the scope of the Corporate Receivables - Special Financing Exposure category (with and without ratings) as in Appendix A of this FSA Circular Letter.

2) Disclosure of Credit Risk Exposure and Impact of MRK Techniques - Bank Consolidated with Subsidiaries

(in million Rupiah)

	Portfolio Category	December 31, 2024					
		Net Receivables Before Implementation of FKK and MRK Techniques		Net Receivables After Implementation of FKK and MRK Techniques		RWA and Average Risk Weight	
		Statement of Financial Position	TRA	Statement of Financial Position	TRA	RWA	Average Risk Weight (e/(c+d))
		a	b	c	d	e	f
1	Government Receivables	220,634,335	6,061,746	220,443,561	1,629,211	225,019	0.1%
2	Public Sector Entities Receivables	106,420,219	22,011,551	98,660,355	9,834,343	47,300,591	43.6%
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	0.0%
4	Bank Receivables	64,606,143	24,913,576	58,576,351	13,300,047	27,545,320	38.3%
	Securities Companies and Other Financial Services Institutions Receivables[1)]	22,930,673	330,388	22,915,800	168,683	15,838,970	68.6%
5	Receivables in the form of Covered Bond	-	-	-	-	-	0.0%
6	Corporate Receivables - General Corporate Exposure[2)]	366,083,016	42,168,357	363,247,765	18,756,378	345,950,580	90.6%
	Securities Companies and Other Financial Services Institutions Receivables[3)]	-	-	-	-	-	0.0%
	Special Financing Exposure[4)]	36,357,817	-	36,357,817	-	33,365,547	91.8%
7	Receivables in the form of Securities/Subordinated Receivables, Equity and Other Capital Instruments	748,360	-	748,360	-	1,840,900	246.0%
8	Micro Business, Small Business, and Retail Portfolio Receivables	143,476,114	43,243,840	122,445,954	12,801,820	108,546,128	80.3%
9	Loans Secured by Real Estate	-	-	-	-	-	0.0%
	Loans Secured by Residential Property which the payments Are Not Materially Dependent on Property Cash Flow	69,419,951	869,605	68,931,203	135,602	34,274,675	49.6%

(in million Rupiah)

	Portfolio Category	December 31, 2024					
		Net Receivables Before Implementation of FKK and MRK Techniques		Net Receivables After Implementation of FKK and MRK Techniques		RWA and Average Risk Weight	
		Statement of Financial Position	TRA	Statement of Financial Position	TRA	RWA	Average Risk Weight (e/(c+d))
	Loans Secured by Residential Property which the payments Are Materially Dependent on Property Cash Flow	12,213	46	10,841	5	9,951	91.8%
	Commercial Property Backed Loans whose Payments are Not Materially Dependent on Property Cash Flows	13,588,151	734,521	11,052,560	246,365	9,509,059	84.2%
	Commercial Property Backed Loans whose Payments are Materially Dependent on Property Cash Flows	135,776	-	110,137	-	116,781	106.0%
10	Loan by Land Acquisition, Land Processing and Construction	125,969	4,154	125,684	415	126,157	100.0%
11	Past Due Receivables	6,183,349	618,434	5,651,249	61,843	4,859,364	85.1%
12	Other Assets	59,314,270	-	59,314,270	-	46,048,140	77.6%
Total		**1,110,036,355**	**140,956,219**	**1,068,591,908**	**56,934,712**	**675,557,182**	**60.0%**

1) Represents receivables included in the Securities Companies and Other Financial Services Institutions Receivables Portfolio Category as in Appendix A of this FSA Circular Letter.
2) Represents receivables that are included in the scope of Corporate Receivables - general corporate exposure Portfolio Category as in Appendix A of this FSA Circular Letter (excluding numbers 3) and numbers 4)).
3) Represents Securities Companies and Other Financial Services Institutions Receivables that are not included in the Portfolio Category as in number 1).
4) Represents receivables that fall within the scope of the Corporate Receivables - Special Financing Exposure category (with and without ratings) as in Appendix A of this FSA Circular Letter.

Exposure Disclosure based on Asset Class and Risk Weight

1) Exposure Disclosure based on Asset Class and Risk Weight - Bank Only

Portfolio Category	December 31, 2024															
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation															
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%
1 Government Receivables	216,569,462			112,010							358,156					
2 Public Sector Entities Receivables				32,639,102							72,822,514					
3 Multilateral Development Banks and International Institutions Receivables	-			-		-					-					

(in million Rupiah)

	December 31, 2024													Net Receivables After FKK and MRK Techniques
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation													
	75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others

					100%					150%				Others	Net Receivables After FKK and MRK Techniques
					23,539					-				-	217,063,168

					100%					150%				Others	Net Receivables After FKK and MRK Techniques
					376,219					2,656,863				-	108,494,697

					100%					150%				Others	Net Receivables After FKK and MRK Techniques
					-					-				-	-

1) Exposure Disclosure based on Asset Class and Risk Weight - Bank Only

Portfolio Category	December 31, 2024															
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation															
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%
Portfolio Category				20%		30%			40%		50%					
4 Bank Receivables				26,596,736		6,369,805			3,378,681		28,105,105					
Securities Companies and Other Financial Services Institutions Receivables[1]				2,187,526		339,618			-		1,518					
Portfolio Category		10%	15%	20%	25%		35%				50%					
5 Receivables in the form of Covered Bond		-	-	-	-		-				-					
Portfolio Category				20%							50%			65%[5]		
6 Corporate Receivables - General Corporate Exposure[2]				22,812,491							20,443,411			-		
Securities Companies and Other Financial Services Institutions Receivables[3]				-							-			-		
Special Financing Exposure[4]				-							-					
Portfolio Category																
7 Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments																
Portfolio Category										45%						
8 Micro Business, Small Business, and Retail Portfolio Receivables										6,465,213						
Portfolio Category	0%			20%	25%	30%	35%		40%	45%	50%		60%	65%[5]		70%
9 Loans Secured by Real Estate																
Loans Secured by Residential Property which the payments Are Not Materially Dependent on Property Cash Flow	-			6,241,372	3,242,832	14,564,136			11,221,500		6,826,687			-		6,419,350

(in million Rupiah)

	December 31, 2024													
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation													Net Receivables After FKK and MRK Techniques
	75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others
	75%				100%					150%			Others	Net Receivables After FKK and MRK Techniques
	4,524,982				508,053					-			-	69,483,361
	20,218,131				-					-			-	22,746,793
					100%								Others	Net Receivables After FKK and MRK Techniques
					-								-	-
	75%	80%	85%		100%				130%	150%			Others	Net Receivables After FKK and MRK Techniques
	11,351,024	-	37,280,089		284,789,576				-	2,304,696			-	378,981,287
	-		-		-					-			-	-
	-	23,027,735			7,929,540				5,377,591	-			-	36,334,866
					100%					150%	250%	400%[5)]		Others	Net Receivables After FKK and MRK Techniques
					20,000					-	105,414	-		-	125,414
	75%		85%		100%								Others	Net Receivables After FKK and MRK Techniques
	105,502,228		830,063		16,654,817								-	129,452,321
	75%		85%	90%	100%	105%	110%			150%			Others	Net Receivables After FKK and MRK Techniques
													-	-
	18,386,871		1,344,122		-					-			-	68,246,869

1) Exposure Disclosure based on Asset Class and Risk Weight - Bank Only

Portfolio Category	December 31, 2024																
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation																
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%	
without loan sharing approach[5)]																	
using a loan sharing approach (guaranteed)[5)]																	
using a loan sharing approach (guaranteed)[5)]																	
Loans Secured by Residential Property which the payments Are Materially Dependent on Property Cash Flow						2,043	56			190			864				
Loans Secured by Commercial Property which the payments Are Materially Dependent on Property Cash Flow	-			-		-			-		-		786,833	-			
without loan sharing approach[5)]																	
using a loan sharing approach (guaranteed)[5)]																	
using a loan sharing approach (guaranteed)[5)]																	
Loans Secured by Commercial Property which the payments Are Materially Dependent on Property Cash Flow																17,347	
Loan by Land Acquisition, Land Processing and Construction																	

Portfolio Category		50%	
10	Past Due Receivables	2,474,595	

(in million Rupiah)

	December 31, 2024													
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation													Net Receivables After FKK and MRK Techniques
	75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others	
														-	-
														-	-
														-	-
	420					6,187				1,087				-	10,846
	3,721,466		1,905,181		854,078					-				-	7,267,559
														-	-
														-	-
														-	-
				23,758			63,550			5,482				-	110,137
					126,100					-				-	126,100

					100%					150%				Others	Net Receivables After FKK and MRK Techniques
					2,680,687					556,170				-	5,711,452

1) Exposure Disclosure based on Asset Class and Risk Weight - Bank Only

Portfolio Category	December 31, 2024															
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation															
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%

Portfolio Category	0%	20%
11 Other Assets	13.626.708	-

1) Claims that fall within the portfolio category of claims on securities companies and other financial institutions, as outlined in Annex A of this Financial Services Authority Circular Letter No 24/SEOJK.03/2021.
2) Claims that fall within the portfolio category of claims on corporations – general corporate exposure, as outlined in Annex A of this Financial Services Authority Circular Letter No 24/SEOJK.03/2021 (excluding points [3] and [4]).
3) Claims on securities companies and other financial institutions that do not fall within the portfolio category specified in point [1].
4) Claims that fall within the portfolio category of claims on corporations – special financing exposure (both rated and unrated), as outlined in Annex A of this Financial Services Authority Circular Letter No 24/SEOJK.03/2021.
5) Not applicable in accordance with this Financial Services Authority Circular Letter No 24/SEOJK.03/2021.

No	Risk Weight	December 31, 2024	
		Net Receivables Statement of Financial Position	TRA Net Receivables (before FKK imposition)
1	< 40%	332,590,298	32,076,215
2	40%-70%	147,325,332	33,236,546
3	75%	148,299,222	38,254,530
4	80%	23,027,735	-
5	85%	41,154,365	2,050,906
6	90%-100%	342,770,042	32,006,348
7	105-130%	5,447,323	46
8	150%	6,090,908	337,422
9	250%	105,414	-
10	400%	-	-
11	1250%	-	-

2) Exposure Disclosure based on Asset Class and Risk Weight - Bank Consolidated with Subsidiaries

Portfolio Category	December 31, 2024															
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation															
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%

Portfolio Category	0%	20%	50%
1 Government Receivables	221,579,067	112,010	358,156

Portfolio Category	20%	50%
2 Public Sector Entities Receivables	32,639,102	72,822,514

(in million Rupiah)

	December 31, 2024													Net Receivables After FKK and MRK Techniques
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation													
	75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others

	100%	150%	1250%[5]	Others	Net Receivables After FKK and MRK Techniques
	43,820,607	827,183	-	5,031	58,279,529

(in million Rupiah)

	December 31, 2024	
	FKK Average	Net Receivables (After imposition of FKK and MRK Techniques)
	39.65%	345,308,928
	36.38%	159,417,738
	40.27%	163,705,121
	0.00%	23,027,735
	10.00%	41,359,456
	46.98%	357,806,974
	10.00%	5,447,328
	77.22%	6,351,481
	0.00%	105,414
	0.00%	-
	0.00%	-

(in million Rupiah)

	December 31, 2024													Net Receivables After FKK and MRK Techniques
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation													
	75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others

	100%	150%	Others	Net Receivables After FKK and MRK Techniques
	23,539	-	-	222,072,772

	100%	150%	Others	Net Receivables After FKK and MRK Techniques
	376,219	2,656,863	-	108,494,697

2) Exposure Disclosure based on Asset Class and Risk Weight - Bank Consolidated with Subsidiaries

Portfolio Category	December 31, 2024															
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation															
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%
Portfolio Category	0%			20%		30%					50%					
3 Multilateral Development Banks and International Institutions Receivables	-			-		-					-					
Portfolio Category				20%		30%			40%		50%					
4 Bank Receivables				27,995,258		6,369,805			3,425,463		28,105,105					
Securities Companies and Other Financial Services Institutions Receivables[1)]				2,187,526		339,618			337,690		1,518					
Portfolio Category		10%	15%	20%	25%		35%				50%					
5 Receivables in the form of Covered Bond		-	-	-	-		-				-					
Portfolio Category				20%							50%			65%[5)]		
6 Corporate Receivables - General Corporate Exposure[2)]				23,115,704							20,443,411			-		
Securities Companies and Other Financial Services Institutions Receivables[3)]				-							-			-		
Special Financing Exposure[4)]				-							-					
Portfolio Category																
7 Receivables in the form of Securities/ Subordinated Receivables, Equity and Other Capital Instruments																
Portfolio Category										45%						
8 Micro Business, Small Business, and Retail Portfolio Receivables										6,465,213						
Portfolio Category	0%			20%	25%	30%	35%		40%	45%	50%		60%	65%[5)]		70%
9 Loans Secured by Real Estate																

(in million Rupiah)

December 31, 2024														
Net Receivables After Taking into Account the Impact of Credit Risk Mitigation														Net Receivables After FKK and MRK Techniques
75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others	
				100%					150%				Others	Net Receivables After FKK and MRK Techniques
				-					-				-	-
75%				100%					150%				Others	Net Receivables After FKK and MRK Techniques
5,472,716				508,053					-				-	71,876,399
20,218,131				-					-				-	23,084,483
				100%									Others	Net Receivables After FKK and MRK Techniques
				-									-	-
75%	80%	85%		100%				130%	150%				Others	Net Receivables After FKK and MRK Techniques
11,351,024	-	37,901,672		286,887,637				-	2,304,696				-	382,004,143
-		-		-					-				-	-
-	23,027,735			7,952,491				5,377,591	-				-	36,357,817
				100%					150%	250%	400%[5]		Others	Net Receivables After FKK and MRK Techniques
				20,000					-	728,360	-		-	748,360
75%		85%		100%									Others	Net Receivables After FKK and MRK Techniques
107,345,163		940,343		20,497,055									-	135,247,775
75%		85%	90%	100%	105%	110%			150%				Others	Net Receivables After FKK and MRK Techniques
													-	-

2) Exposure Disclosure based on Asset Class and Risk Weight - Bank Consolidated with Subsidiaries

Portfolio Category	December 31, 2024																
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation																
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%	
without loan sharing approach[5]	-			6,296,187	3,289,131	14,721,554			11,340,830		6,858,159			-		6,819,765	
using a loan sharing approach (guaranteed)[5]																	
using a loan sharing approach (guaranteed)[5]																	
Loans Secured by Residential Property which the payments Are Materially Dependent on Property Cash Flow																	
Loans Secured by Commercial Property which the payments Are Materially Dependent on Property Cash Flow						2,043	56			190			864				
without loan sharing approach[5]	-			-		-			-		-		1,371,086	-			
using a loan sharing approach (guaranteed)[5]																	
using a loan sharing approach (guaranteed)[5]																	
Loans Secured by Commercial Property which the payments Are Materially Dependent on Property Cash Flow																	
Loan by Land Acquisition, Land Processing and Construction																17,347	

(in million Rupiah)

	December 31, 2024													
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation													Net Receivables After FKK and MRK Techniques
	75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others	
	18,393,837		1,347,341		-					-				-	69,066,804
														-	-
														-	-
														-	-
	420					6,187				1,087				-	10,846
	3,870,825		5,202,936		854,078					-				-	11,298,925
														-	-
														-	-
														-	-
				23,758			63,550			5,482				-	110,137

2) Exposure Disclosure based on Asset Class and Risk Weight - Bank Consolidated with Subsidiaries

Portfolio Category	December 31, 2024															
	Net Receivables After Taking into Account the Impact of Credit Risk Mitigation															
	0%	10%	15%	20%	25%	30%	35%	37,5%	40%	45%	50%	52,5%	60%	65%	67,5%	70%
Loan by Land Acquisition, Land Processing and Construction																

Portfolio Category		50%
10	Past Due Receivables	2,475,556

Portfolio Category		0%	20%
11	Other Assets	13,718,613	-

1) Claims that fall within the portfolio category of claims on securities companies and other financial institutions, as outlined in Annex A of this Financial Services Authority Circular Letter No 24/SEOJK.03/2021.
2) Claims that fall within the portfolio category of claims on corporations – general corporate exposure, as outlined in Annex A of this Financial Services Authority Circular Letter No 24/SEOJK.03/2021 (excluding points [3] and [4]).
3) Claims on securities companies and other financial institutions that do not fall within the portfolio category specified in point [1].
4) Claims that fall within the portfolio category of claims on corporations – special financing exposure (both rated and unrated), as outlined in Annex A of this Financial Services Authority Circular Letter No 24/SEOJK.03/2021.
5) Not applicable in accordance with this Financial Services Authority Circular Letter No 24/SEOJK.03/2021.

No	Risk Weight	December 31, 2024	
		Net Receivables Statement of Financial Position	TRA Net Receivables (before FKK imposition)
1	< 40%	346,475,341	32,137,738
2	40%-70%	155,609,016	33,588,397
3	75%	172,044,721	38,294,547
4	80%	23,027,735	-
5	85%	48,541,912	2,995,250
6	90%-100%	351,624,514	33,602,818
7	105-130%	5,464,755	46
8	150%	6,610,745	337,422
9	250%	728,360	-
10	400%	-	-
11	1250%	-	-

(in million Rupiah)

December 31, 2024														
Net Receivables After Taking into Account the Impact of Credit Risk Mitigation														Net Receivables After FKK and MRK Techniques
75%	80%	85%	90%	100%	105%	110%	112,5%	130%	150%	250%	400%	1250%	Others	
				126,100					-				-	126,100

				100%					150%				Others	Net Receivables After FKK and MRK Techniques
				2,681,366					556,170				-	5,713,092

				100%					150%			1250%[5)]	Others	Net Receivables After FKK and MRK Techniques
				44,675,801					914,825			-	5,031	59,314,270

(in million Rupiah)

December 31, 2024	
FKK Average	Net Receivables (After imposition of FKK and MRK Techniques)
39.65%	352,370,705
36.42%	160,938,640
40.27%	166,652,115
0.00%	23,027,735
20.10%	45,392,292
46.65%	364,626,097
10.00%	5,447,328
77.22%	6,439,123
0.00%	728,360
0.00%	-
0.00%	-

Exposure Disclosure based on Asset Class and Risk Weight

1) Exposure Disclosure based on Asset Class and Risk Weight - Bank Only

(in million Rupiah)

No	Portfolio Category	Net Receivables	ATMR
1	Total Exposure to QCCP	5,031	101
2	Exposures transacted with QCCP (excluding initial margin and default fund contribution)	-	-
	(i) OTC derivatives	-	-
	(ii) derivative transactions through exchanges	-	-
	(iii) securities financing transactions	-	-
	(iv) netting set (in case cross-product netting is allowed)	-	-
3	Segregated initial margin	-	-
4	Nonsegregated initial margin	-	-
5	Prefunded default fund contribution	5,031	101
6	Unfunded default fund contribution	-	-
7	Total Exposure to NonQCCP	-	-
8	Exposures transacted through nonQCCP (excluding initial margin and default fund contribution)	-	-
	(i) OTC derivatives	-	-
	(ii) derivative transactions through exchanges	-	-
	(iii) securities financing transactions	-	-
	(iv) netting set (in case cross-product netting is allowed)	-	-
9	Segregated initial margin	-	-
10	Nonsegregated initial margin	-	-
11	Prefunded default fund contribution	-	-
12	Unfunded default fund contribution	-	-
13	**Total Exposure to QCCP and NonQCCP**	**5,031**	**101**

2) Exposure Disclosure based on Asset Class and Risk Weight - Bank Consolidated with Subsidiaries

(in million Rupiah)

No	Portfolio Category	Net Receivables	ATMR
1	Total Exposure to QCCP	5,031	101
2	Exposures transacted with QCCP (excluding initial margin and default fund contribution)	-	-
	(i) OTC derivatives	-	-
	(ii) derivative transactions through exchanges	-	-
	(iii) securities financing transactions	-	-
	(iv) netting set (in case cross-product netting is allowed)	-	-
3	Segregated initial margin	-	-
4	Nonsegregated initial margin	-	-
5	Prefunded default fund contribution	5,031	101
6	Unfunded default fund contribution	-	-
7	Total Exposure to NonQCCP	-	-
8	Exposures transacted through nonQCCP (excluding initial margin and default fund contribution)	-	-
	(i) OTC derivatives	-	-
	(ii) derivative transactions through exchanges	-	-
	(iii) securities financing transactions	-	-
	(iv) netting set (in case cross-product netting is allowed)	-	-
9	Segregated initial margin	-	-
10	Nonsegregated initial margin	-	-
11	Prefunded default fund contribution	-	-
12	Unfunded default fund contribution	-	-
13	**Total Exposure to QCCP and NonQCCP**	**5,031**	**101**

Qualitative Disclosure Regarding Counterparty Credit Risk

Qualitative	
Banks must provide:	
(a) Risk management objectives and policies related to loan risk due to counterparty loan risk, including:	The risk management and policies objectives related to loan risk due to counterparty failure (Counterparty Credit Risk/CCR) include 1. Fulfilling regulatory requirements so that the Bank has policies, processes and systems to manage loan risk due to counterparty failure/CCR, as implemented in accordance with the complexity of BNI exposures that give rise to CCR. 2. Standardizing loan risk management due to counterparty/CCR failure including identification, measurement, management, approval and internal CCR reporting. When carrying out Counterparty transactions, BNI must assess the creditworthiness of the Counterparty and take into account the consequences of settlement and pre-settlement loan risks.

Qualitative	
(b) The method used to apply the operating limits defined on internal capital for counterparty loan exposures and for CCP exposures;	Counterparty Credit Risk/CCR exposure calculated at BNI uses the precautionary principle and includes FX Forward Derivative Transactions, FX Swap, Cross Currency Swap (CCS) and Interest Rate Swap (IRS). The method used to determine operating limits for Counterparty Credit Exposures consists of limits for (i) Financial Institution (FI) debtors and (ii) Non-Financial Institution (Non-FI) debtors. 1. Determination of Limits for Financial Institutions (FI) Operational limits on Counterparty Credit Risk Exposure for FI debtor derivative transactions are carried out by determining the Counterparty Limit (CL). CL is given to domestic and foreign banks, remittance agencies and other domestic financial institutions that are guaranteed by the Government with correspondent status. Analysis of granting or adding CL is carried out by the Business Unit and Risk Unit at the Head Office, however other Business Units (such as Trade Finance or Treasury) and Overseas Branch Offices can submit input on granting or adding CL. Determination of the Maximum Counterparty Limit: a. The maximum limit for new and review CL facilities is generally set in the form of a Global Line that does not exceed BNI's Maximum Lending Limit (BMPK). b. For overseas correspondents, the maximum limit for new CL facilities and reviews is determined by the correspondent category based on: 1) Credit Rating, at least one of 3 (three) international institutions, namely S&P, Moody's, Fitch; as well as 2) Country Risk, based on the International Country Risk Guide (ICRG). Maximum CL Facility Matrix based on Credit Rating and Country Risk: a. Category I correspondents when determining and reviewing CL use the Counterparty Limit Application Package (CLAP) analysis, and the Global Line form. The CL amount is set at a maximum LLL at "very low", "low", "moderate" risk countries with a maximum of USD 10 million for "high" risk countries that do not exceed the LLL. b. Category II correspondence in CL determination and review using the CLAP analysis and the Global Line form. The CL amount is set at a maximum LLL at "very low", "low", "moderate" risk countries with a maximum of USD 10 million for "high" risk countries that do not exceed the LLL. c. Category III correspondence in CL determination and review using the CLAP analysis and the Global Line form. The maximum CL amount is USD 10 million for "very low", "low", "moderate" risk countries that do not exceed the LLL. CL is not given for "high" risk countries An explanation of the correspondent categories is as follows: Category I covers correspondents with a credit rating > BBB- to AAA Category II covers correspondents with a credit rating > CCC+ to BB+ Category III covers correspondents with a credit rating < CCC+ and/or correspondents that do not have a rating 2. Determination of Limits for Non-Financial Institutions (Non-FI) Application of operating limits to Counterparty Credit Risk Exposure for Derivative transactions are carried out by providing a Treasury Line to customers. Treasury lines are a facility provided to customers (debtors and non-debtors) as a maximum limit for derivative transaction risk exposure in accordance with the provisions regulated by the Regulator. The process for proposing a Treasury Line facility for each type of customer is as follows: a. Debtor The process of providing Treasury Line facilities to debtors is carried out in the same way as the process of providing loan facilities. 1) If the debtor applies for a Treasury Line facility not at the same time as the loan facility, then the application process uses the Treasury Line facility form. 2) If the debtor applies for a Treasury Line facility at the same time as the loan facility, then the Treasury Line application process uses the Credit Application Tool (PAK). Debtors can carry out derivative transactions with BNI without a Treasury Line facility as long as they submit collateral in the form of a Marginal Deposit. b. Non Debtor 1) Can directly carry out transactions with the BNI Treasury Unit without setting up a Treasury Line facility and must submit collateral in the form of a Marginal Deposit of 1.2 x the Credit Conversion Factor (FKK) x the Transaction Notional. 2) Transactions are based on derivative transaction agreements.

Qualitative	
(c) Policies related to guarantees and risk mitigation and assessment of counterparty risk, including exposure towards CCP;	Policies related to guarantees/guarantees against Counterparty Credit Risk Exposure. Derivative transactions carried out at BNI are classified as follows: a. Debtor 1) The guarantee is adjusted to the guarantee provisions of the applicable Business Banking segment, namely: • Full cover guarantee, decision authority rests with the Credit Committee according to authority on the basis of Total Exposure • Full cover guarantee in the form of a combination of cash, collateral and other assets. 2) Conditions for fulfilling collateral refer to requirements for fulfilling sufficient collateral for a Working Capital Loan 3) If there are other matters to consider, the amount of collateral can be determined based on risk analysis and business potential to obtain approval from the Credit Committee. For debtors without a Treasury Line, the collateral is in the form of a Marginal Deposit of 1.2 x FKK x the Transaction Notional. b. Non Debtor 1) Collateral in the form of a Marginal Deposit of 1.2 x FKK x the Transaction Notional and direct transactions with the BNI Treasury Unit based on a Derivative Transaction Agreement 2) The collateral in point b.1) above is blocked and tied to a pledge accompanied by a power of attorney for disbursement on the transaction due date. Risk mitigation and assessment related to Counterparty Credit Risk Exposure. Derivative transactions carried out at BNI are carried out through Treasury Line Facility Monitoring and Treasury Line Facility Reviews a. Monitoring Treasury Line Facilities • Debtor Carried out by the Risk Management and Treasury unit. • Non Debtor Carried out by the Treasury unit by ensuring that the collateral is still blocked and pledged until the transaction matures. b. Review of Treasury Line Facilities 1. Debtor Carried out by the Business and Risk unit. 2. Non-Debtor Carried out by the Treasury unit Use of the Treasury Line facility is carried out by calculating the transaction Credit Conversion Factor (FKK). FKK is a percentage that shows the amount of loan risk arising from Forex or Derivative transactions at a certain tenor. The FKK table is reviewed periodically (every 6 months) by the Risk Management Unit and submitted to the relevant units.
(d) Policies related to wrong-way risk exposure;	Policies related to mitigating wrong-way risk exposure at BNI are carried out through: 1. Routine monitoring to identify early deviations in the movement of transaction indicators from original market predictions, including the mark to market activities and stress tests to compare with the Budget Loss Limit, 2. Applying Stress Tests based on scenarios of changes in Interest Rates and Exchange Rates periodically (every 6 months), or incidentally to measure the level of risk/ impact that may occur, and reporting to Management, 3. If a certain tiering of the Budget Loss Limit has been exceeded, corrections and mitigation steps are taken in stages using the Management Action Trigger (MAT) mechanism.
(e) Impact on the value of collateral required to provide for a loan downgrade.	When a loan rating downgrade occurs, a temporary freeze limit mechanism is used to carry out a more in-depth study on the potential risks faced. Then, mitigation steps can be taken in the form of a top up of the collateral value.

Analysis of Net Credit Risk due to Counterparty Failure Based on the Approach Used

(in million Rupiah)

		a	b	c	d	e	f
No		**Replacement Cost (RC)**	**Potential Future Exposure (PFE)**	**EEPE**	**Alpha used for regulatory EAD calculations**	**Net Receivables**	**ATMR**
1	SA-CCR (for derivatives)	21,713,934	4,942,712		1,4	37,319,304	19,833,311
2	Internal Model Method (for derivatives and SFTs)					-	-
3	Simple Approach for credit risk mitigation (for SFTs)					-	-
4	Comprehensive Approach for credit risk mitigation (for SFTs)					-	-
5	VaR for SFTs					-	-
6	**Total**						**19,833,311**

CCR Exposure by Portfolio and Risk Weight under Standardized Approach

(in million Rupiah)

	a	b	c	d	e	f	g	h	i
Risk Weight	**0%**	**10%**	**20%**	**50%**	**75%**	**100%**	**150%**	**Others**	**Total Net Receivables**
Portfolio Category									
Sovereigns	176,098	-	-	-	-	-	-	-	176,098
Non-central government public sector entities (PSEs)	-	-	416,886	8,543,121	-	-	-	-	8,960,007
Multilateral development banks (MDBs)	-	-	-	-	-	-	-	-	-
Banks	-	-	6,929,361	16,221,595	-	-	-	-	23,150,956
Securities firms	-	-	-	-	-	-	-	-	-
Corporates	-	-	-	-	-	4,444,936	-	-	4,444,936
Regulatory retail portfolios	-	-	-	-	-	2,481,271	-	-	2,481,271
Other assets	-	-	-	-	-	-	-	-	-
Total	**176,098**	**-**	**7,346,247**	**24,764,716**	**-**	**6,926,208**	**-**	**-**	**39,213,269**

Net Receivables from Credit Derivatives

(in million Rupiah)

	a	b
	Protection purchased	**Protection sold**
Notional Value	-	-
Single-name credit default swaps	-	-
Index credit default swaps	-	-
Total return swaps	-	-
Credit options	-	-
Other credit derivatives	-	-
Total Notional Value	-	-
Fair value	-	-
Positive fair value (asset)	-	-
Negative fair value (liability)	-	-

Qualitative Disclosures on Securitization Exposures

Qualitative	
Qualitative Disclosure	
A) Banks should articulate their risk management objectives and policies concerning securitization activities, along with the key features of these activities, in accordance with the framework outlined below. In the event that the bank holds securitization positions within its statement of financial position or engages in off-balance sheet transactions, it should provide a detailed explanation of the following aspects, distinguishing between different activities in each regulatory book.	
(a) The bank's objectives regarding securitization and re-securitization activities, including the transfer of credit risk from the underlying securitization exposure from the bank to another entity, as well as the nature of the risks assumed and those retained.	BNI engages in securitization activities as part of its business transactions through securities investments. In these activities, BNI assumes the role of an investor by purchasing Asset-Backed Securities (EBA). BNI conducts securitization in alignment with prudent practices and sound corporate governance while carefully considering both business and risk aspects. Risks that may arise in BNI's securitization activities as an Investor include: (1) Credit risk/default Investors will experience losses if the issuer/issuer of Securities experiences a decline in performance, which affects the ability to pay for coupons and principals of securities. (2) Interest rate risk where Securities can experience price fluctuations due to the influence of changes in interest rates. The price of Securities will fall if there is an increase in interest rates. (3) Early repayment If there is an early repayment (early call), it will affect the yield received.
(b) The bank must provide a list: Special Purpose Entities (SPEs) in which the bank acts as a sponsor—but not as an originator, such as in an Asset-Backed Commercial Paper (ABCP) conduit—while specifying whether the bank consolidates the SPE within the regulatory consolidation scope. Affiliated entities that (i) are regulated or advised by the bank and (ii) invest not only in securitization exposures originated by the bank but also in Special Purpose Entities (SPEs) sponsored by the bank. a list of entities with implicit support from the bank and the associated impact on capital for them	In EBA securitization, BNI operates as an investor and, therefore, does not required to provide a list of Special Purpose Entities (SPEs).
(c) Summary of bank accounting policies related to securitization activities.	Accounting Policies in terms of EBA Securitization are as follows: 1. Purchased securities are categorized based on the business model that manages the Securities and the characteristics of the Securities' contractual cash flows. These categories include: a. Measured at amortized acquisition cost b. Measured at fair value through other comprehensive income (FVOCI) c. Measured at fair value through profit or loss (FVTPL) 2. Purchased securities are recorded on the transaction date unless otherwise stated by the relevant regulator to be recorded on the settlement date 3. In the case of purchasing securities in the form of bonds purchased between interest payment dates, the interest payment is not part of the acquisition cost, but is included in the interest income item that will still be received

Qualitative	
	4. At the time of initial recognition, the Bank records Securities/Equity transactions at fair value, namely: Category of Securities Recorded at the Time of Purchase Measured at amortized cost at the fair value of the securities, taking into account transaction income/expenses that can be directly attributed to the acquisition of the securities. Measured at fair value through other comprehensive income (FVOCI) at the fair value of the securities, accounting for transaction income/expenses directly attributable to the acquisition of the securities. Measured at fair value through profit or loss (FVTPL) at the fair value of the securities 5. The quality/collectibility of Securities is determined as: (1) Current (3) Substandard (5) Loss 6. Allowance for Losses on Securities The allowance for securities losses is calculated using two approaches: the calculation based on POJK, referred to as the Allowance for Asset Quality Assessment (PPKA), and the calculation based on PSAK 71, known as the Expected Credit Loss (ECL). 7. In terms of EBA securitization, BNI acts as an investor in the purchase of KIK EBA PT Indonesia Power which is included in the category measured at fair value through other comprehensive income (FVOCI).
(d) If applicable, the names of the credit rating institutions (ECAIs) used for the securitization by the appointed agent.	BNI does not use credit rating institutions (ECAIs) in the case of EBA securitization, considering that BNI acts as an investor.
(e) Banks must explain the function of internal assessments	BNI must conduct internal risk assessments to identify, monitor, and evaluate investment risks. These assessments include analysis of bond purchase limits and values as well as review of limits and review of investment activities. In the context of securities purchases, internal assessments are primarily carried out by establishing limits based on specific indicators and criteria, including: 1. Securities Purchase Limit In its role as an investor, BNI can purchase Securities if the issuer of the Securities has a purchase limit set by the Business and Risk Unit. The determination of these limits, among others, takes into account: a. Issuer/Issuer Rating b. Securities Rating c. Issuer/Issuer Performance 2. Securities Concentration Limit Taking into account the concentration of securities based on the issuer (Corporate and Government Securities) and concentration based on currency type (IDR and Foreign Exchange). 3. Corporate Securities Liquidity Level Limit Taking into account the rating of Corporate Securities and the classification of Securities.

Securitization Exposure in Banking Book

No	English	Bank as originator			Bank as sponsor			Bank as investor		
		Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total
1	**Retail (total) – of which**	-	-	-	-	-	-	-	-	-
2	Residential mortgage	-	-	-	-	-	-	-	-	-
3	Credit card	-	-	-	-	-	-	-	-	-
4	Other retail exposures	-	-	-	-	-	-	-	-	-
5	Re-securitisation	-	-	-	-	-	-	-	-	-
6	**Wholesale (total) – of which**	-	-	-	-	-	-	-	-	-
7	Loans to corporates	-	-	-	-	-	-	-	-	-
8	Commercial mortgage	-	-	-	-	-	-	-	-	-
9	Lease and receivables	-	-	-	-	-	-	-	-	-
10	Other wholesale	-	-	-	-	-	-	-	-	-
11	Re-securitisation	-	-	-	-	-	-	-	-	-

Securitization Exposure on Trading Book

No	English	Bank as originator			Bank as sponsor			Bank as investor		
		Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total	Traditional	Synthetic	Sub-total
1	**Retail (total) – of which**	-	-	-	-	-	-	-	-	-
2	Residential mortgage	-	-	-	-	-	-	-	-	-
3	Credit card	-	-	-	-	-	-	-	-	-
4	Other retail exposures	-	-	-	-	-	-	-	-	-
5	Re-securitisation	-	-	-	-	-	-	-	-	-
6	**Wholesale (total) – of which**	-	-	-	-	-	-	-	-	-
7	Loans to corporates	-	-	-	-	-	-	-	-	-
8	Commercial mortgage	-	-	-	-	-	-	-	-	-
9	Lease and receivables	-	-	-	-	-	-	-	-	-
10	Other wholesale	-	-	-	-	-	-	-	-	-
11	Re-securitisation	-	-	-	-	-	-	-	-	-

Securitization exposure in the banking book when the bank is the originator or sponsor and its capital requirements

No		Exposure value (based on Risk Weight)				
		≤20% Risk Weight	>20% to 50% Risk Weight	>50% to 100% Risk Weight	>100% to <1250% Risk Weight	1250% Risk Weight
1	Total exposures	-	-	-	-	-
2	Traditional securitisation	-	-	-	-	-
3	Of which securitisation	-	-	-	-	-
4	Of which retail underlying	-	-	-	-	-
5	Of which wholesale	-	-	-	-	-
6	Of which re-securitisation	-	-	-	-	-
7	Of which senior	-	-	-	-	-
8	Of which non-senior	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-
10	Of which securitisation	-	-	-	-	-
11	Of which retail underlying	-	-	-	-	-
12	Of which wholesale	-	-	-	-	-
13	Of which re-securitisation	-	-	-	-	-
14	Of which senior	-	-	-	-	-
15	Of which non-senior	-	-	-	-	-

Securitization exposure on the banking book and capital requirements - Bank as investor

No		Exposure value (based on Risk Weight)				
		≤20% Risk Weight	>20% to 50% Risk Weight	>50% to 100% Risk Weight	>100% to <1250% Risk Weight	1250% Risk Weight
1	Total exposures	-	-	-	-	-
2	Traditional securitisation	-	-	-	-	-
3	Of which securitisation	-	-	-	-	-
4	Of which retail underlying	-	-	-	-	-
5	Of which wholesale	-	-	-	-	-
6	Of which re-securitisation	-	-	-	-	-
7	Of which senior	-	-	-	-	-
8	Of which non-senior	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-
10	Of which securitisation	-	-	-	-	-
11	Of which retail underlying	-	-	-	-	-
12	Of which wholesale	-	-	-	-	-
13	Of which re-securitisation	-	-	-	-	-
14	Of which senior	-	-	-	-	-
15	Of which non-senior	-	-	-	-	-

	Exposure value (based on regulatory approach)				RWA (based on regulatory approach)				Capital charge after cap			
	IRB RBA (including IAA)	IRB SFA	SA/ SSFA	1250%	IRB RBA (including IAA)	IRB SFA	SA/ SSFA	1250%	IRB RBA (including IAA)	IRB SFA	SA/ SSFA	1250%
	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-
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	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-

	Exposure value (based on regulatory approach)				RWA (based on regulatory approach)				Capital charge after cap			
	IRB RBA (including IAA)	IRB SFA	SA/ SSFA	1250%	IRB RBA (including IAA)	IRB SFA	SA/ SSFA	1250%	IRB RBA (including IAA)	IRB SFA	SA/ SSFA	1250%
	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-
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	-	-	-	-	-	-	-	-	-	-	-	-

2. MARKET RISK

Disclosure of Market Risk Using the Standardized Approach

1. Bank Only

(in million Rupiah)

Risk	Capital Charge Under the Standardized Approach per Desember 2024
GIRR Risk	469,733,08
Non-Securitized CSR	211,079,44
Non-CTP Securitized CSR	-
CTP Securitized CSR	-
Equity Risk	-
Commodity Risk	-
Foreign Exchange Risk	112,101,24
DRC – non Securitized	-
DRC - non-CTP Securitized	-
DRC - CTP Securitized	-
RRAO	-
Total	**792,913,76**

2. Bank Consolidated with Subsidiaries

(in million Rupiah)

Risk	Capital Charge Under the Standardized Approach per Desember 2024
GIRR Risk	472,256,21
Non-Securitized CSR	212,749,87
Non-CTP Securitized CSR	-
CTP Securitized CSR	-
Equity Risk	33,759,10
Commodity Risk	-
Foreign Exchange Risk	112,076,60
DRC – non Securitized	21,266,10
DRC - non-CTP Securitized	-
DRC - CTP Securitized	-
RRAO	-

Disclosure of Market Risk Using Internal Method

No	Type of Risk	December 31, 2024			
		Daily average VaR	Maximum VaR	Minimum VaR	End of Period VaR
1	Interest Rate Risk	269,649	351,999	187,516	301,467
2	Exchange Rate Risk	8,287	20,486	3,277	10,659
3	Option Risk	-	-	-	-
Total		**277,936**	**372,486**	**190,793**	**312,126**

Individual Risk Management Implementation Report for IRRBB

In million Rupiah	Δ EVE		Δ NII	
Periode	T	T-1	T	T-1
Parallel Up	(621,647)	2,296,568	(3,147,981)	(2,605,851)
Parallel Down	327,217	(4,176,526)	3,352,213	2,768,027
Steepener	(6,356,751)	(308,096)		
Flattener	4,457,396	(324,472)		
Short Rate Up	3,115,055	731,009		
Short Rate Down	(5,858,776)	(3,392,722)		
Absolute Negative Maximum Value	**6,356,751**	**4,176,526**	**3,147,981**	**2,605,851**
Tier 1 Capital (for Δ EVE) or Projected Income (for Δ NII)	142,119,632	138,206,082	39,259,572	38,581,491
Maximum amount divided by Tier 1 capital (for Δ EVE) or Projected Income (for Δ NII)	**4.47%**	**3.02%**	**8.02%**	**6.75%**

T = Reporting Period December 2024
T - 1 = Reporting Period September 2024

(in million Rupiah)

	December 31, 2024			
	Daily average VaR	Maximum VaR	Minimum VaR	End of Period VaR
	272,556	325,264	223,506	254,764
	12,495	23,217	8,533	13,732
	-	-	-	-
	285,051	**348,481**	**232,039**	**268,496**

Individual Risk Management Implementation Report for IRRBB

	Qualitative Analysis
1	Interest rate risk in the Banking Book or Interest Rate Risk in the Banking Book, hereinafter abbreviated as IRRBB, is a current and future risk to the Bank's capital and profitability (earnings) caused by movements in interest rates in the market which have an impact on the Banking position Book. Included in the IRRBB is gap risk that arises from the term structure of banking book instruments; basis risk which describes the impact of relative changes in interest rates on financial instruments assessed using different interest rate curves; option risk arising from financial derivative positions or from the option risk element inherent in financial instruments.
2	The Bank manages IRRBB exposure using an economic value approach and a profitability/income approach (earning based measures). As an implementation of segregation of duty, the Treasury Division acts as a unit that functions to manage interest rate risk and the Risk Management Division acts as a unit that monitors interest rate risks that arise. For the purpose of controlling and mitigating interest rate risk in the banking book, the Bank establishes controls both quantitatively in the form of applying limits and risk appetite. The Bank also carries out qualitative risk control such as management strategies, risk transfer through the Funds Transfer Pricing (FTP) mechanism and also hedging strategies.
3	The IRRBB calculation is carried out on a quarterly basis which then become part of the Risk Profile, part of the Bank's Health Level Self Assessment, part of the Quantitative Information on Risk Exposure, and part of the Disclosure of Risk Management Practices. In order to measure IRRBB exposure, the Bank uses economic value and profitability as the basis for the measurement method. Measuring the economic value of equity (economic value of equity), hereinafter referred to as EVE, measures changes in the economic value of the Bank's assets, liabilities and off-balance sheet accounts due to movements in interest rates. Currently, the Bank measures changes in EVE (ΔEVE) as the maximum decrease in the economic value of the banking book in six standard interest scenarios defined by the Basel Committee on Banking Supervision (BCBS) and FSA as stated in SEOJK IRRBB no SEOJK/12/2018. Measuring bank profitability (earnings-based measure) looks at the estimated changes in net interest income, hereinafter abbreviated to NII (net interest income) caused by movements in interest rates in the market for a certain period. For this reason, the Bank measures changes in NII (ΔNII) as the maximum decrease in NII if there is a scenario of parallel increases or decreases in interest rates as defined by the Basel Committee on Banking Supervision (BCBS) and SEOJK IRRBB no SEOJK/12/2018, compared to financial planning Bank for a 12 month period.
4	In measuring EVE, the Bank uses the standardized approach SEOJK IRRBB No. SEOJK/12/2018, which the interest rate shock scenario used includes: 1) parallel shock up in interest rates (parallel shock up); 2) parallel shock down in interest rates (parallel shock down); 3) a sloping interest rate shock (steepener shock) with a combination of decreasing short-term interest rates and increasing longterm interest rates (short rates down and long rates up); 4) a flattening interest rate shock with a combination of increasing short-term interest rates and decreasing long-term interest rates (short rates up and long rates down); 5) rising short-term interest rate shock (short rates shock up); And 6) short-term interest rate shock decreases (short rates shock down). In measuring NII, the Bank uses the standardized approach SEOJK IRRBB No. SEOJK/12/2018, where the interest rate shock scenario used includes: 1) parallel shock up in interest rates (parallel shock up); 2) parallel shock down in interest rates (parallel shock down). In the future, for risk control purposes, the Bank will also evaluate IRRBB exposure using internal stress scenarios for EVE and NII measurements.
5	There were no differences in methodology or modeling assumptions in the calculations used in the internal management system. In other words, the Bank uses the Standardized Approach as a reference in calculating IRRBB for internal management purposes
6	Currently the Bank has a hedging instrument in the form of an Interest Rate Swap (IRS) to offset potential losses that arise if there is a potential loss on AFS securities. The bank also carries out daily MTM on the IRS instrument.
7	a For the EVE method, the bank calculates all cash flows from the principal value and interest payments which includes the commercial margin (client rate) discounted at the risk free rate at the reporting date;

Qualitative Analysis	
b	The Bank uses a portfolio replication model and/or uniform slotting method in determining slotting and average repricing maturities for NMD by taking into account the caps and provisions on average terms as stated in the SEOJK IRRBB. The Bank has interest rate exposure from Non-Maturity Deposits (NMDs) positions originating from wholesale and retail customers. To manage interest rate risk, the Bank carries out two-stage modeling in accordance with the provisions of SEOJK IRRBB. In the first stage, the Bank analyzes changes in volume to determine the portion of NMD that is stable in the sense that it has a small possibility of being withdrawn by customers. In the second stage, the Bank measures the proportion of core savings from stable NMD that customers will not withdraw even if there are large changes in market interest while the Bank does not adjust the interest on the NMD in question. The main dimensions that influence the maturity of core NMDs (Core Deposits) are the elasticity of deposit interest to changes in market interest rates, volatility of deposit volumes and other factors including customer behavior and macroeconomics. By paying attention to the NMD modeling limitations that apply to the Standardized Approach, the Bank determines the distribution and average repricing maturity maturity using a replicating portfolio approach and/or uniform slotting method depending on the availability and reliability of data for each relevant NMD category at this time. consisting of wholesale NMD, transactional retail NMD and non-transactional retail NMD. Modeling parameters are based on historical observations, statistical analysis and management assessments.
c	The Bank performs risk modeling or estimation to determine the prepayment rate for fixed rate loans and early withdrawal rate for term Deposits if these risks are not adequately mitigated, for example through penalty provisions. early withdrawal rate for Term Deposits if these risks are not adequately mitigated for example through penalty provisions. In estimating the prepayment rate, the Bank uses statistical methods based on historical data in analyzing accelerated credit repayment rates. Several main dimensions that influence customer repayment rates include: market interest rates, credit interest rates, credit nominal, and several other factors. Meanwhile, in estimating the early withdrawal rate, the Bank uses the Exponential Weighted Moving Average (EWMA) method. This model assumes that tomorrow's projected results are influenced by today's actual data and past data. Several main dimensions that influence customer withdrawal rates include: deposit interest rates, deposit nominal and several other factors.
d	There are no other assumptions used by the Bank apart from the assumptions set by the SEOJK IRRBB.
e	The Bank calculates the IRRBB for each material currency and then aggregates them. The aggregation methodology is carried out by simple addition.

Quantitative Analysis	
1	The average period for interest rate adjustment (repricing maturity) for the Rupiah includes: - Wholesale for 1.01 years; - Transactional Retail for 2.15 years; - Non-Transactional Retail for 1.31 years. The average interest rate adjustment period (repricing maturity) for USD includes: - Wholesale for 0.81 years; - Transactional Retail for 2.04 years; - Non-Transactional Retail for 1.16 years.
2	The longest interest rate adjustment period (repricing maturity) for the Rupiah includes: - Wholesale for a period of 5 years; - Transactional Retail for a period of 5 years; - Non-Transactional Retail for a period of 5 years. The longest interest rate adjustment period (repricing maturity) for USD includes: - Wholesale for a period of 5 years; - Transactional Retail for a period of 5 years; - Non-Transactional Retail for a period of 5 years

Consolidated IRRBB Calculation Report with Subsidiaries

In million Rupiah	Δ EVE		Δ NII	
Period	**T**	**T-1**	**T**	**T-1**
Parallel Up	(6,155)	2,766,734	(3,114,315)	(2,706,931)
Parallel Down	(342,507)	(4,440,463)	3,318,547	2,869,107
Steepener	(6,922,874)	(1,061,165)		
Flattener	5,082,35	630,323		
Short Rate Up	3,899,955	1,532,843		
Short Rate Down	(6,695,067)	(4,299,691)		
Absolute Negative Maximum Value	**6,922,874**	**4,440,463**	**3,114,315**	**2,706,931**
Tier 1 Capital (for Δ EVE) or Projected Income (for Δ NII)	147,431,803	143,500,145	40,603,033	39,881,101
Maximum amount divided by Tier 1 capital (for Δ EVE) or Projected Income (for Δ NII)	**4.70%**	**3.09%**	**7.67%**	**6.79%**

T = Reporting Period December 2024
T - 1 = Reporting Period September 2024

Implementation of Risk Management for Consolidated IRRBB with Subsidiaries

	Qualitative Analysis
1	Interest rate risk in the Banking Book or Interest Rate Risk in the Banking Book, hereinafter abbreviated as IRRBB, is a current and future risk to the capital and profitability (earnings) of the Bank and Subsidiaries caused by movements in interest rates in the market which have an impact in the Banking Book position. Included in the IRRBB is gap risk that arises from the term structure of banking book instruments; basis risk which describes the impact of relative changes in interest rates on financial instruments assessed using different interest rate curves; option risk arising from financial derivative positions or from the option risk element inherent in financial instruments.
2	Banks and Subsidiaries manage IRRBB exposure using an economic value approach and a profitability/income approach (earning based measures). As an implementation of segregation of duty, there is a separation between the unit that functions to manage interest rate risk and the unit that monitors interest rate risk that arises. For the purpose of controlling and mitigating interest rate risk in the banking book, the Bank and Subsidiaries establish controls both quantitatively in the form of implementing limits and risk appetite.The Bank and Subsidiaries also carry out qualitative risk control such as management strategies, risk transfer through the FundsTransfer Pricing (FTP) mechanism and also hedging strategies.
3	The IRRBB calculation is carried out on a quarterly basis which will then become part of the Risk Profile, part of the Bank's Soundness Level Self Assessment, part of the Quantitative Information on Risk Exposure, and part of the Disclosure of Risk Management Practices. In order to measure IRRBB exposure, the Bank and Subsidiaries use economic value and profitability as the basis for the measurement method. Measurement of the economic value of equity (economic value of equity), hereinafter referred to as EVE, measures changes in the economic value of assets, liabilities and administrative accounts (off balance sheet) of Banks and Subsidiaries caused by movements in interest rates. Currently, the Bank and Subsidiaries measure changes in EVE (ΔEVE) as the maximum decrease in the economic value of the banking book in six standard interest scenarios defined by the Basel Committee on Banking Supervision (BCBS) and FSA as stated in SEOJK IRRBB no SEOJK/12/ 2018. Measuring bank profitability (earnings-based measure) looks at the estimated changes in net interest income, hereinafter abbreviated to NII (net interest income) caused by movements in interest rates in the market for a certain period. For this reason, the Bank and Subsidiaries measure changes in NII (ΔNII) as the maximum decrease in NII if there is a scenario of parallel increases or decreases in interest rates as defined by the Basel Committee on Banking Supervision (BCBS) and SEOJK IRRBB no SEOJK/12/2018, compared with financial planning of the Bank and Subsidiaries for a 12 month period.
4	In measuring EVE, the Bank and Subsidiaries use the SEOJK IRRBB standardized approach no SEOJK/12/2018, which the interest rate shock scenario used includes: 1) parallel shock up in interest rates (parallel shock up); 2) parallel shock down in interest rates (parallel shock down); 3) a sloping interest rate shock (steepener shock) with a combination of decreasing short-term interest rates and increasing longterm interest rates (short rates down and long rates up); 4) a flattening interest rate shock with a combination of increasing short-term interest rates and decreasing long-term interest rates (short rates up and long rates down); 5) rising short-term interest rate shock (short rates shock up); And 6) short-term interest rate shock decreases (short rates shock down). In measuring NII, the Bank and Subsidiaries use the SEOJK IRRBB standardized approach no SEOJK/12/2018, which the interest rate shock scenario used includes: 1) parallel shock up in interest rates (parallel shock up); 2) parallel shock down in interest rates (parallel shock down). In the future, for risk control purposes, the Bank and Subsidiaries will also evaluate IRRBB exposure using internal stress scenarios for EVE and NII measurements.
5	There were no differences in methodology or modeling assumptions in the calculations used in the internal management system. In other words, the Bank and Subsidiaries use the Standardized Approach as a reference in calculating IRRBB for internal management purposes.
6	Currently, the Bank has a hedging instrument in the form of an Interest Rate Swap (IRS) to offset potential losses that arise if there is a potential loss on AFS securities.The bank also carries out daily MTM on the IRS instrument.

Qualitative Analysis	
7	a. For the EVE Method, the Bank and Subsidiaries calculate all cash flows from the principal amount and interest payments which include the commercial margin (client rate) discounted at the risk free rate at the reporting date; b. The Bank and Subsidiaries use the portfolio replication model and/or uniform slotting method in determining the slotting and average repricing maturities for NMD by taking into account the caps and provisions on the average term as stated in the SEOJK IRRBB. The Bank and Subsidiaries have interest rate exposure from Non-Maturity Deposits (NMDs) positions originating from wholesale and retail customers. To manage the interest rate risk, the Bank and Subsidiaries carried out two-stage modeling in accordance with the provisions of the SEOJK IRRBB. In the first stage, the Bank and Subsidiaries carry out an analysis of changes in volume to determine the portion of NMD that is stable in the sense that it has a small possibility of being attracted by customers. In the second stage, the Bank and Subsidiary Companies measure the proportion of core savings from stable NMD that customers will not withdraw even if there are large changes in market interest, while the Bank and Subsidiary Companies do not adjust the interest on the NMD in question. The main dimensions that influence the maturity of core NMDs (Core Deposits) are the elasticity of deposit interest to changes in market interest rates, volatility of deposit volumes and other factors including customer behavior and macroeconomics. By taking into account the NMD modeling limitations that apply to the Standardized Approach, the Bank and Subsidiaries determine the distribution and average repricing maturity maturity using a replicating portfolio approach and/or uniform slotting method depending on the availability and reliability of data for each relevant NMD category. Currently it consists of wholesale NMD, transactional retail NMD and non-transactional retail NMD. Modeling parameters are based on historical observations, statistical analysis and also professional judgment. c Banks and Subsidiaries carry out risk modeling or estimation to determine prepayment rates for fixed interest loans and early withdrawal rates for time deposits if these risks are not adequately mitigated, for example through fine provisions. In estimating the prepayment rate, the Bank and Subsidiaries use statistical methods based on historical data in analyzing accelerated credit repayment rates. Several main dimensions that influence customer repayment rates include: market interest rates, credit interest rates, credit nominal, and several other factors. Meanwhile, in estimating the early withdrawal rate, the Bank and Subsidiaries use the Exponential Weighted Moving Average (EWMA) method. This model assumes that tomorrow's projected results are influenced by today's actual data and past data. Several main dimensions that influence customer withdrawal rates include: deposit interest rates, deposit nominal and several other factors. d There are no other assumptions used by the Bank and Subsidiaries apart from the assumptions set by the SEOJK IRRBB. e Banks and Subsidiaries calculate IRRBB for each material currency and then aggregate them. The aggregation methodology is carried out by simple addition.
1	The average period for interest rate adjustment (repricing maturity) for the Rupiah includes: - Wholesale for 1.01 years - Transactional Retail for 2.15 years - Non-Transactional Retail for 1.31 years The average interest rate adjustment period (repricing maturity) for USD includes: - Wholesale for 0.81 years - Transactional Retail for 2.04 years - Non-Transactional Retail for 1.16 years
2	The longest period of interest rate adjustment (repricing maturity) for the Rupiah includes: - Wholesale for a period of 5 years; - Transactional Retail for a period of 5 years; - Non-Transactional Retail for a period of 5 years. The longest interest rate adjustment period (repricing maturity) for USD includes: - Wholesale for a period of 5 years; - Transactional Retail for a period of 5 years; - Non-Transactional Retail for a period of 5 years.

3. LIQUIDITY RISK

Disclosure of Liquidity Coverage Ratio for Bank Only for the Position as at December 2024

(in million Rupiah)

		Value of Outstanding Liabilities and Commitments/ Value of Contractual Claims	Value of HQLA After Deduction of (Haircut), Outstanding Liabilities and Commitment Times Run-Off Rate or Value of Contractual Claims Times Inflow Rate
HIGH QUALITY LIQUID ASSET (HQLA)			
1	Total High Quality Liquid Asset (HQLA)		175,929,525
CASH OUTFLOW			
2	Retail deposits and deposits from Micro and Small Business:	399,933,940	28,349,082
	a. Stable deposit/funding	232,886,244	11,644,312
	b. Less Stable deposit/funding	167,047,696	16,704,770
3	Funding from corporate customers consisting of:	376,829,505	95,277,596
	a. Operational deposits	277,374,926	60,102,586
	b. Non-operational deposit and/or other non-operational liabilities	99,454,579	35,175,010
	c. Marketable securities (bank issued debt notes)	-	-
4	secured funding		530,667
5	Additional requirement, consisting of:	260,764,472	126,482,075
	a. Cash outflow on derivative transaction	112,000,263	112,000,263
	b. Cash outflow on additional liquidity	-	-
	c. Cash outflow on lost funding	-	-
	d. Cash outflow on withdrawal of commitments of loan and liquidity facility	6,563,142	656,314
	e. Cash outflow on other contractual liability related to lending	-	-
	f. Cash outflow on other lending contingencies	130,917,689	2,542,120
	g. Other contractual cash outflows	11,283,378	11,283,378
TOTAL CASH OUTFLOW			250,639,421
CASH INFLOW			
6	Secured lending	8,220,390	-
7	Claims from counterparty	57,164,951	17,530,205
8	Other cash inflows	116,733,451	114,200,155
TOTAL CASH INFLOW		**182,118,792**	**131,730,360**
			TOTAL ADJUSTED VALUE[1]
TOTAL HQLA			**175,929,525**
TOTAL NET CASH OUTFLOWS			**118,909,061**
LCR (%)			**147.95%**

Description:
1. Adjusted values are determined after applying haircuts, run-off rates, and inflow rates, along with the maximum limits for High-Quality Liquid Asset (HQLA) components. This includes, for example, the maximum limits for HQLA Level 2B and HQLA Level 2, as well as the maximum allowable cash inflows that can be included in the Liquidity Coverage Ratio (LCR) calcula-tion.

Analysis of Liquidity Coverage Ratio Development for Bank Only

	Analysis
1	LCR Individual (Bank Only) position in Q4 2024 was 147.95% above the required provision of 100%.
2	LCR in Q4 2024 decreased by 0.32% compared to Q3 2024 previously from 148.27% to 147.95% due to an increase in Net Cash Outflow of IDR6.94 trillion.
3	The composition of HQLA as of Q4 2024 was still dominated by HQLA Level 1 of 99.36%. Meanwhile, HQLA Level 2A was 0.51% and Level 2B was 0.13%, still below the maximum HQLA limit required.
4	Bank liquidity can be maintained properly in accordance with regulations and supports bank business activities.
5	There are no cash inflows and cash outflows from the LCR calculation that are not included in the LCR template.

Disclosure of Liquidity Coverage Ratio for Bank Consolidated with Subsidiaries for the Position as at December 2024

(in million Rupiah)

		Value of Outstanding Liabilities and Commitments/ Value of Contractual Claims	Value of HQLA After Deduction of (Haircut), Outstanding Liabilities and Commitment Times Run-Off Rate or Value of Contractual Claims Times Inflow Rate
HIGH QUALITY LIQUID ASSET (HQLA)			
1	Total High Quality Liquid Asset (HQLA)		181,310,377
CASH OUTFLOW			
2	Retail deposits and deposits from Micro and Small Business:	403,722,223	28,714,280
	a. Stable deposit/funding	233,158,841	11,657,942
	b. Less Stable deposit/funding	170,563,382	17,056,338
3	Funding from corporate customers consisting of:	381,489,848	96,911,959
	a. Operational deposits	279,185,740	60,553,633
	b. Non-operational deposit and/or other non-operational liabilities	102,304,108	36,358,326
	c. Marketable securities (bank issued debt notes)	-	-
4	Secured funding		530,667
5	Additional requirement, consisting of:	263,226,340	127,121,005
	a. Cash outflow on derivative transaction	112,000,263	112,000,263
	b. Cash outflow on additional liquidity	-	-
	c. Cash outflow on lost funding	-	-
	d. Cash outflow on withdrawal of commitments of loan and liquidity facility	8,356,645	825,084
	e. Cash outflow on other contractual liability related to lending	-	-
	f. Cash outflow on other lending contingencies	131,122,023	2,548,250
	g. Other contractual cash outflows	11,747,409	11,747,409
TOTAL CASH OUTFLOW			**253,277,912**
CASH INFLOW			
6	Secured lending	9,475,677	34,401
7	Claims from counterparty	32,536,656	17,802,975
8	Other cash inflows	118,256,724	115,107,430
TOTAL CASH INFLOW		**160,269,057**	**132,944,806**
			TOTAL ADJUSTED VALUE[1]
TOTAL HQLA			**181,310,377**
TOTAL NET CASH OUTFLOWS			**120,333,106**
LCR (%)			**150.67%**

Description:
1 Adjusted values are calculated after the imposition of haircuts, run-off rates, and inflow rates as well as the maximum limit of HQLA components, e.g. HQLA Level 2B and HQLA Level 2 maximum limits as well as the maximum limit of cash inflows that can be taken into account in the LCR.

Analysis of Liquidity Coverage Ratio Development for Bank Consolidated with Subsidiaries

	Analysis
1	BNI Consolidated LCR position in Quarter IV 2024 of 150.67% above the required provision of 100%.
2	BNI Consolidated LCR in Quarter IV 2024 of 150.67% decreased by 1.65% compared to Quarter III 2024 of 152.33% due to an increase in Net Cash Outflow of IDR 7.32 trillion.
3	BNI consolidated liquidity can be maintained properly in accordance with regulations and supports the bank's business activities.
4	There are no cash inflows and cash outflows from the LCR calculation that are not included in the LCR template.

Disclosure of Net Stable Funding Ratio, Bank Only
December 2024 Position

(in million Rupiah)

ASF Component		Carrying Value based on Remaining Tenor				Total Weighted Value
		No Tenor	< 6 month	< 6 month – 1 year	≥1 year	
		Carrying Value	Carrying Value	Carrying Value	Carrying Value	
1	**Capital:**	177,705,552	-	-	-	177,705,552
2	Capital as CAR POJK	177,705,552	-	-	-	177,705,552
3	Other capital components	-	-	-	-	-
4	**Deposits from individual customers and funding from micro and small business customers:**	**320,563,841**	**29,580,204**	**25,602,353**	**2,544,231**	**378,290,629**
5	Stable deposits	225,227,935	-	-	-	225,227,935
6	Less stable deposits	95,335,906	29,580,204	25,602,353	2,544,231	153,062,694
7	**Funding from corporate customers:**	144,169,560	35,794,478	9,610,884	13,683,062	203,257,984
8	Operational funding	144,169,560	-	-	-	144,169,560
9	Other funding from corporate customers	-	35,794,478	9,610,884	13,683,062	59,088,424
10	**NSFR for derivative liabilities**	**-**	**-**	**-**	**-**	**-**
11	**Other liabilities:**	**-**	**-**	**34,633**	**5,181**	**39,813**
12	NSFR for derivative liabilities		-	-	-	
13	Equity and liability components other than the above category	-	-	34,633	5,181	39,813
14	**Total ASF**					**759,293,978**

RSF Component		Carrying Value based on Remaining Tenor				Total Weighted Value
		No Tenor	< 6 month	< 6 month – 1 year	≥1 year	
		Carrying Value	Carrying Value	Carrying Value	Carrying Value	
15	**Total HQLA for the calculation of NSFR**	**-**	**612,884**	**238,964**	**13,453,434**	**14,305,282**
16	**Deposit with other financial institutions for operational purposes**	**10,770,936**	**-**	**-**	**-**	**10,770,936**
17	**Loans in Current and Special Mention Category (Performing) and marketable securities**	**-**	**83,660,051**	**129,131,591**	**255,103,902**	**467,895,544**
18	To financial institutions secured by HQLA Level 1	-	728,126	-	-	728,126
19	To financial institutions secured by non-HQLA Level 1 and unsecured loan to financial institutions	-	671,021	1,950,358	34,590	2,655,969
20	To non-financial institutions, individual customers, and micro and small business customers, Government of Indonesia, government of other countries, Bank Indonesia, central banks of other countries, and public sector entities, including those that:	-	69,731,953	123,092,588	190,674,934	383,499,475
21	Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk	-	7,872,352	14,634,599	6,622,766	29,129,717
22	Loans secured with unpledged residential properties, including those that:	-	1,420,992	1,844,873	48,325,536	51,591,401

	RSF Component	Carrying Value based on Remaining Tenor				Total Weighted Value
		No Tenor	< 6 month	< 6 month – 1 year	≥1 year	
		Carrying Value	Carrying Value	Carrying Value	Carrying Value	
23	Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk	-	313,250	532,644	14,625,242	15,471,136
24	Marketable Securities not under pledge, not in default, and not classified as HQLA, including shares traded at the stock exchange	-	11,107,958	2,243,773	16,068,842	29,420,573
25	**Assets with interdependent liability match**	**-**	**-**	**-**	**-**	**-**
26	**Other assets:**	**756**	**24,936,326**	**549,878**	**51,527,857**	**77,846,586**
27	Tradable physical commodities, including gold	-		-	-	-
28	Cash, marketable securities and other assets recorded as initial margin in derivative contracts and cash or other assets delivered as default fund to the central counterparty (CCP)		-	-	17,000	17,000
29	NSFR of derivative assets		136,672	23,833	110,033	270,538
30	NSFR of derivative liabilities before deduction of variation margin		-	-	-	-
31	All other assets not included in the above categories**)	756	24,760,692	526,044	51,400,824	76,688,317
32	**Administrative Account**		**1,547,379**	**714,110**	**930,590**	**3,360,744**
33	**Total RSF**					**584,219,330**
34	**Stable Funding Ratio (%)**					**132.48%**

Analysis of the Development of Net Stable Funding Ratio of Bank Only

	Qualitative Analysis
1	Individual NSFR for December 2024 was 132,48% and was still above the required provisions, namely 100%.
2	Individual NSFR for the position in December 2024 compared to the NSFR for the position in September 2024 increased from 136,57% to 132,48%. In December 2024, there was an increase in Total Available Stable Funding (ASF) of around 2.55% and in Required Stable Funding (RSF) of around 5.71%.
3	The growth rate of Available Stable Funding (ASF) amounted to IDR18.86 trillion. Meanwhile, the growth rate of Required Stable Funding (RSF) reached IDR30.98 trillion, primarily driven by the increase in performing loans classified as Current and Special Mention, as well as securities.

Disclosure of Net Stable Funding Ratio for the Bank Consolidated with Subsidiaries
December 2024 Position

(in million Rupiah)

ASF Component		Carrying Value based on Remaining Tenor				Total Weighted Value
		No Tenor	< 6 month	< 6 month – 1 year	≥1 year	
		Carrying Value	Carrying Value	Carrying Value	Carrying Value	
1	**Capital:**	**184,153,312**	**-**	**-**	**-**	**184,153,312**
2	Capital as CAR POJK	184,147,168	-	-	-	184,147,168
3	Other capital components	6,144	-	-	-	6,144
4	**Deposits from individual customers and funding from micro and small business customers:**	**321,497,663**	**32,202,752**	**25,742,699**	**2,568,014**	**382,011,128**
5	Stable deposits	225,420,632	70,521	28,709	20,553	225,540,416
6	Less stable deposits	96,077,031	32,132,231	25,713,990	2,547,461	156,470,712
7	**Funding from corporate customers:**	**146,120,883**	**37,975,513**	**9,735,261**	**13,683,062**	**207,514,719**
8	Operational funding	146,120,883	151,240	26,377	-	146,298,500
9	Other funding from corporate customers	-	37,824,273	9,708,884	13,683,062	61,216,219
10	**NSFR for derivative liabilities**	**-**	**-**	**-**	**-**	**-**
11	**Other liabilities:**	**159,997**	**-**	**445,155**	**3,200,292**	**3,805,444**
12	NSFR for derivative liabilities		-	-	-	
13	Equity and liability components other than the above category	159,997	-	445,155	3,200,292	3,805,444
14	**Total ASF**					**777,484,603**

RSF Component		Carrying Value based on Remaining Tenor				Total Weighted Value
		No Tenor	< 6 month	< 6 month – 1 year	≥1 year	
		Carrying Value	Carrying Value	Carrying Value	Carrying Value	
15	**Total HQLA for the calculation of NSFR**	**-**	**711,560**	**281,038**	**13,465,673**	**14,458,271**
16	**Deposit with other financial institutions for operational purposes**	**10,778,624**	**286,486**	**-**	**-**	**11,065,110**
17	**Loans in Current and Special Mention Category (Performing) and marketable securities**	**13,196**	**85,870,144**	**131,479,079**	**260,126,200**	**477,488,619**
18	To financial institutions secured by HQLA Level 1	-	728,126	-	-	728,126
19	To financial institutions secured by non-HQLA Level 1 and unsecured loan to financial institutions	13,196	858,558	1,950,607	76,103	2,898,464
20	To non-financial institutions, individual customers, and micro and small business customers, Government of Indonesia, government of other countries, Bank Indonesia, central banks of other countries, and public sector entities, including those that:	-	71,611,562	125,198,183	195,318,218	392,127,962

	RSF Component	Carrying Value based on Remaining Tenor				Total Weighted Value
		No Tenor	< 6 month	< 6 month – 1 year	≥1 year	
		Carrying Value	Carrying Value	Carrying Value	Carrying Value	
21	Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk	-	9,751,961	16,740,194	11,266,049	37,758,204
22	Loans secured with unpledged residential properties, including those that:	-	1,538,993	1,999,308	48,455,531	51,993,832
23	Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk	-	431,250	687,079	14,755,237	15,873,567
24	Marketable Securities not under pledge, not in default, and not classified as HQLA, including shares traded at the stock exchange	-	11,132,905	2,330,981,15	16,276,349	29,740,235
25	**Assets with interdependent liability match**	**-**	**-**	**-**	**-**	**-**
26	**Other assets:**	**513,325**	**24,936,326**	**586,828**	**51,810,107**	**77,846,586**
27	Tradable physical commodities, including gold	-		-	-	-
28	Cash, marketable securities and other assets recorded as initial margin in derivative contracts and cash or other assets delivered as default fund to the central counterparty (CCP)		-	-	17,000	17,000
29	NSFR of derivative assets		136,672	23,833	110,033	270,538
30	NSFR of derivative liabilities before deduction of variation margin		-	-	-	-
31	All other assets not included in the above categories**)	513,325	24,799,655	562,995	51,683,074	77,559,049
32	**Administrative Account**		**1,691,142**	**714,110**	**955,493**	**3,360,744**
33	**Total RSF**					**584,219,330**
34	**Stable Funding Ratio (%)**					**133.08%**

Qualitative Analysis of Net Stable Funding Ratio for Bank Consolidated with Subsidiaries

	Qualitative Analysis
1	The consolidated NSFR as of December 2024 stood at 133.08%, exceeding the regulatory requirement of 100%.
2	Compared to the NSFR position in September 2024, the December 2024 NSFR declined from 137.33% to 133.08%. As of December 2024, there was an increase of approximately 2.52% in Available Stable Funding (ASF) and a 5.79% increase in Required Stable Funding (RSF).
3	The growth rate of Available Stable Funding (ASF) amounted to IDR19.09 trillion. Meanwhile, the growth rate of Required Stable Funding (RSF) reached IDR31.98 trillion, primarily driven by the increase in performing loans classified as Current and Special Mention, as well as securities.

Encumbered Assets Table

(in million Rupiah)

	a	b	c	d
	Encumbered Assets	Assets held or agreed with the Central Bank but not yet used to generate liquidity	Unencumbered Assets	Total
Assets in the statement of financial position may be presented in detail as required.	10,892,911	90,701,675	73,770,695	175,365,281

Qualitative Analysis

a. Encumbered assets are bank assets restricted, both legally and contractually by the Bank, for supporting liquidity. Encumbered assets do not include assets being placed with or pledged to Bank Indonesia but yet to be used to create liquidity. Currently, the Bank has encumbered assets of IDR10.89T in the form of repo transactions.

b. Currently, the Bank has assets that are being placed with or pledged to Bank Indonesia amounting to IDR90.70T in the form of Secondary Reserves (PLM). The assets pledged to Bank Indonesia have not been used to generate liquidity but are still calculated as HQLA as stipulated in the POJK Liquidity Coverage Ratio for Commercial Banks.

c. Unencumbered assets are assets that qualify as High Quality Liquid Asset (HQLA) as stipulated by the POJK on Liquidity Coverage Ratio for Commercial Banks. Currently, the Bank has unencumbered assets of IDR73.77 T, including cash, placements with Bank Indonesia, government securities, corporate securities.

4. OPERATIONAL RISK

Disclosure of Operational Risks Quantitative for Bank Only

No	The approach used	December 31, 2024			
		Business Indicator Components	Internal Loss Multiplier Factor (FPKI)	Minimum Operational Risk Capital (MMRO)	RWA
1	Approach Basic Indicator	4,813,384	0.62	2,992,869	37,410,865

Disclosure of Operational Risks Quantitative for Bank Consolidated with Subsidiaries

No	The approach used	December 31, 2024			
		Business Indicator Components	Internal Loss Multiplier Factor (FPKI)	Minimum Operational Risk Capital (MMRO)	RWA
1	Approach Basic Indicator	4,838,206	0.63	3,037,782	37,972,275

(in million Rupiah)

	December 31, 2023			
	Business Indicator Components	Internal Loss Multiplier Factor (FPKI)	Minimum Operational Risk Capital (MMRO)	RWA
	4,450,593	0.63	2,797,350	34,966,876

(in million Rupiah)

	December 31, 2023			
	Business Indicator Components	Internal Loss Multiplier Factor (FPKI)	Minimum Operational Risk Capital (MMRO)	RWA
	4,515,914	0.63	2,862,050	35,775,619

07

Good Corporate Governance

Best Achievements in Corporate Governance Implementation	604
Commitment to Sustainable Corporate Governance Implementation	605
Correlation Between Corporate Governance Implementation and Bank Performance	610
Governance Framework	611
Corporate Governance Structure And Mechanism	612
Continuous Improvement of GCG Implementation Quality	615
General Meeting of Shareholders	630
Board Of Commissioners	652
Independent Commissioners	699
Board Of Directors	703
Performance Assessment of the Board of Directors and the Board of Commissioners	763
Nomination and Remuneration	768
Diversity of the Board of Commissioners and the Board of Directors	788
Disclosure of Affiliation Relationships Among The Board of Commissioners, Board of Directors, and Controlling Shareholders	790
Committees under the Board of Commissioners	792
Supporting Organs of the Board of Commissioners	858
Committees Under the Board of Directors	862
Supporting Organs of the Board of Directors	899
Internal Control System	938
Risk Management System	946
Integrated Risk Management Governance	971
External Auditor	978
Legal Cases	983
Administrative Sanctions	989
Violations of Laws Related to Employment, Consumer, Bankruptcy, Commercial, Competition and/or Environmental Issues	989
Access to Company Information and Data	990
Governance Framework, Management, and Control of Tax Aspects	1027
Anti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction (APU, PPT, and PPPSPM)	1028
Anti Corruption Policy	1033
Anti-Gratification & Anti-Bribery Policy	1035
Procurement of Goods and/or Services	1039
Company Code of Ethics	1044
Provision of Funds for Social and Political Activities	1048
Provision of Funds for Related Parties and Large Exposure	1049
Providing Loans to Related Parties	1051
Protection Of Creditors' Rights	1053
Transparency of Financial and Non-Financial Conditions	1054
Transparency of Customer Complaints Procedures and Customer Dispute Settlement	1055
Integrity of Reporting and Information Technology Systems	1058
Conflict of Interest Policy (Including Insider Trading)	1059
Shares and Bonds Buyback	1058
Internal Deviations (Internal Fraud)	1062
Performance-based Long-Term Compensation Policy	1064
Disclosure of Information on Board of Commissioners and Board of Directors Share Ownership and Its Application	1070
Violation Reporting System (Whistleblowing System)	1080
Bank's Strategic Plan	1084
Reporting Transparency	1091
Management of State Officials' Assets Reports (LHKPN)	1092
Bad Corporate Governance Practices	1094
Integrated Governance Implementation	1095
Corporate Governance Aspects and Principles Implementation in Accordance with Financial Services Authority Regulations	1104
Implementation of Indonesian Corporate Governance General Guidelines (PUGKI)	1111
Implementation Of The Asean Corporate Governance Scorecard	1138
Implementation Of Corporate Governance Principles For Banks According To Basel Committee On Banking Supervision Standards	1147


BNI

Best Achievements in Corporate Governance Implementation

In carrying out its activities, BNI always prioritizes the best governance principles and practices. Due to the implementation of governance, in 2024 BNI received a number of awards and titles in the field of Corporate Governance, including "The Best Overall - Big Caps" and "The Most Trusted Company".

★★★★★

115.56

"The Best Overall - Big Caps"
The 15th IICD Corporate Governance Conference & Award 2024

★★★★★

92.45

"The Most Trusted Company"
Corporate Governance Perception Index 2023



Commitment to Sustainable Corporate Governance Implementation

BNI is fully committed to applying the principles of Good Corporate Governance ("GCG") across every aspect of its business activities as a foundation to enhance the Bank's performance and contribution, maximize value for shareholders and stakeholders, and ensure the long-term sustainability of BNI's business. BNI's consistency in implementing and upholding GCG principles sustainably in every operational activity stems from the profound awareness of the Board of Commissioners, Board of Directors, management, and all BNI Hi-Movers to continuously improve the application of GCG within the organization.

By emphasizing the AKHLAK culture and driven by the spirit of GCG, BNI continues to grow and evolve as one of Indonesia's largest state-owned banks with global competitiveness. Broadly, the governance outcomes BNI aims to achieve through the strong and consistent implementation of GCG are as follows:
1. Competitiveness and focus on long-term performance
2. Ethical and responsible business practices
3. Positive contributions to society and the environment
4. Resilience and growth capacity (corporate resilience)

To achieve optimal GCG implementation, the Board of Directors and the Board of Commissioners have executed their leadership roles to the fullest. The unwavering commitment of the entire executive management and employees to GCG is demonstrated through the signing of the Integrity Pact (for the Board of Directors and Board of Commissioners) as well as the Commitment to Implement Good Corporate Governance Integrity documents (for employees).

BOARD OF COMMISSIONERS INTEGRITY PACT

1
Perform duties and responsibilities diligently, accurately, and with full accountability in accordance with the authority granted by the Articles of Association of PT Bank Negara Indonesia (Persero) Tbk (hereinafter referred to as BNI), while adhering to BNI's Core Values, Code of Ethics, internal regulations, applicable laws and regulations, as well as sound banking management principles.

2
Create a work environment free from corruption, collusion, and nepotism (KKN) by promoting and supervising the implementation of the Anti-Bribery Management System (SMAP) and/or Gratification Control, including policies, strategies, evaluations, and the adequacy of human resources in SMAP operations.

3
Act objectively and adhere to ethical and moral values, fairness, transparency, consistency, while upholding honesty and commitment, and encourage all business partners to prioritize ethical, sound, and transparent business practices.

4
Refrain from all forms of conflicts of interest in performing duties and ensure that the independence of other BNI personnel remains unaffected.

5
Actively and optimally contribute to preventing potential fraud, refraining from engaging in or tolerating any form of fraud within the workplace, and committing to reporting any suspected fraudulent activity (occurring within the organization and/or utilizing BNI's facilities) through the reporting channels provided by BNI.

6
Willing to accept sanctions if, in carrying out my duties and responsibilities as a BNI employee, I am proven to have failed to uphold the commitments outlined above.

Board of Directors Integrity Pact

1
Perform duties and responsibilities diligently, accurately, and with full accountability in accordance with the authority granted by the Articles of Association of PT Bank Negara Indonesia (Persero) Tbk (hereinafter referred to as BNI), while adhering to BNI's Core Values, Code of Ethics, internal regulations, applicable laws and regulations, as well as the principles of Good Corporate Governance and sound banking management.

2
Create a work environment free from corruption, collusion, and nepotism (KKN) by promoting and supervising the implementation of the Anti-Bribery Management System (SMAP) and/or Gratification Control, realized through activities such as, but not limited to, refraining from offering, promising, and/or receiving any form of remuneration to or from customers, debtors, vendors, partners, collaborators, regulators/supervisors, and/or other external or internal parties.

3
Act objectively and adhere to ethical and moral values, fairness, transparency, consistency, while upholding honesty and commitment, and encourage all business partners to prioritize ethical, sound, and transparent business practices.

4
Refrain from all forms of conflicts of interest in performing duties and ensure that the independence of other BNI personnel remains unaffected.

5
Refrain from using the Company's information and data for personal gain or for the benefit of other parties, as prohibited by internal and external regulations, such as insider trading, misuse of company data, and similar activities.

6
Make decisions with utmost caution (duty of care and loyalty) and professionalism in BNI's operational activities, including procurement of goods and services, human resource management, fund provision, and management of other business activities, in the best interest of BNI.

7
Actively and optimally contribute to preventing potential fraud, refraining from engaging in or tolerating any form of fraud within the workplace, and committing to report any suspected fraudulent activities (occurring within the organization and/or involving BNI's resources) through the reporting channels provided by BNI.

8
Willing to accept sanctions if, in carrying out my duties and responsibilities as a BNI employee, I am found to have failed to fulfill the commitments outlined above.

COMMITMENT TO THE IMPLEMENTATION OF THE GOOD CORPORATE GOVERNANCE INTEGRITY PACT

I, as an individual and in my official capacity, hereby solemnly and consciously commit to the following:

1. To embrace and consistently implement the Core Values of AKHLAK, BNI's Code of Conduct, and BNI's Internal Provisions.
2. To understand and comply with applicable regulations in carrying out duties in accordance with the principles of Good Corporate Governance.
3. To uphold integrity and adhere to ethical, moral, and honest values
4. To work professionally and with due diligence.
5. To actively understand and take full responsibility for the tasks and roles assigned.
6. To fully protect the confidentiality of Customer and Company data.
7. To refrain from using company funds, data, or assets for personal or family interests
8. To play an active role in preventing and combating fraud and violations.
9. To create a work environment free from Corruption, Collusion, and Nepotism (KKN).
10. To implement an Anti-Bribery Management System by avoiding gratuities, bribes, and extortion.
11. To refrain from using personal funds as bridging funds and/or personal accounts for company operational activities.
12. To avoid an excessive lifestyle.
13. To safeguard the company's reputation and use social media responsibly.
14. To avoid any form of conflict of interest.
15. To willingly provide all necessary information for upholding integrity.
16. To be accountable for all facilities and benefits received and ensure their use complies with applicable regulations.
17. To accept sanctions for any violations of this integrity pact.

I sign this commitment in good faith, voluntarily, and irrevocably.

PURPOSE OF IMPLEMENTING CORPORATE GOVERNANCE

The implementation of strong and sustainable GCG practices within BNI aims to:

1) Enhance BNI's corporate value by applying the principles of GCG, which include Transparency, Accountability, Responsibility, Independence, and Fairness, in order to ensure BNI's competitiveness at both national and regional levels, and to achieve sustainable corporate value;
2) Encourage every BNI organ to consistently emphasize GCG culture in every decision-making process, based on applicable values and norms, as well as high compliance with existing laws and regulations;
3) Improve BNI's performance through efficiency programs created by the implementation of GCG culture within every BNI organ;
4) Increase investor trust and position BNI as a top choice for investment.

FOUNDATION FOR THE IMPLEMENTATION OF CORPORATE GOVERNANCE [ACGS D.1.1]

The implementation of GCG at BNI is based on various provisions and guidelines as follows:

1) Law No. 7 of 1992 on Banking, as amended by Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector;
2) Law No. 8 of 1995 on Capital Markets, as amended by Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector;
3) Law No. 40 of 2007 on Limited Liability Companies, as amended by Law No. 6 of 2023 on the Establishment of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation;
4) Law No. 27 of 2022 on Protection of Personal Data;
5) Financial Services Authority Regulation (POJK) No. 17/POJK.03/2014 on Integrated Risk Management for Financial Conglomerates;
6) POJK No. 18/POJK.03/2014 on Integrated Corporate Governance for Financial Conglomerates;
7) POJK No. 33/POJK.04/2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies;
8) POJK No. 35/POJK.04/2014 on Corporate Secretary of Issuers or Public Companies;
9) POJK No. 8/POJK.04/2015 on the Website of Issuers or Public Companies;
10) POJK No. 21/POJK.04/2015 on the Implementation of Corporate Governance Guidelines for Public Companies;
11) POJK No. 26/POJK.03/2015 on Minimum Capital Adequacy Requirements (KPMM) for Financial Conglomerates;
12) POJK No. 31/POJK.04/2015 on Disclosure of Material Information or Facts by Issuers or Public Companies;
13) POJK No. 56/POJK.04/2015 on the Formation and Guidelines of the Internal Audit Unit Charter;
14) POJK No. 4/POJK.03/2016 on the Health Rating of Commercial Banks;
15) POJK No. 5/POJK.03/2016 on the Business Plan of Banks;
16) POJK No. 18/POJK.03/2016 on Risk Management Implementation for Commercial Banks;
17) POJK No. 27/POJK.03/2016 on the Assessment of the Capacity and Appropriateness for Key Parties in Financial Services Institutions;
18) POJK No. 29/POJK.04/2016 on Annual Reports of Issuers or Public Companies;
19) POJK No. 51/POJK.03/2017 on Sustainable Finance Implementation for Financial Services Institutions, Issuers, and Public Companies;
20) POJK No. 1/POJK.03/2019 on Internal Audit Function in Commercial Banks;
21) POJK No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports;
22) POJK No. 15/POJK.04/2020 on the Plan and Implementation of General Meetings of Shareholders of Public Companies;
23) POJK No. 16/POJK.04/2020 on the Conduct of Electronic General Meetings of Shareholders for Public Companies;
24) POJK No. 45/POJK.03/2020 on Financial Conglomerates;
25) POJK No. 12/POJK.03/2021 on Commercial Banks;
26) POJK No. 11/POJK.03/2022 on the Implementation of Information Technology by Commercial Banks;

27) POJK No. 24 of 2022 on the Development of Human Resources Quality in Commercial Banks;
28) POJK No. 8 of 2023 on the Implementation of Anti-Money Laundering, Counter-Terrorism Financing, and the Prevention of the Proliferation of Weapons of Mass Destruction in the Financial Services Sector;
29) POJK No. 17 of 2023 on the Implementation of Governance for Commercial Banks;
30) POJK No. 4 of 2024 on Ownership Reports or Any Changes in Share Ownership in Public Companies and Reports on the Pledge of Public Company Shares;
31) POJK No. 12 of 2024 on the Implementation of Anti-Fraud Strategies for Financial Services Institutions;
32) Financial Services Authority Circular Letter (SEOJK) No. 14/SEOJK.03/2015 on the Implementation of Integrated Risk Management for Financial Conglomerates;
33) SEOJK No. 15/SEOJK.03/2015 on the Implementation of Integrated Corporate Governance for Financial Conglomerates;
34) SEOJK No. 32/SEOJK.04/2015 on Corporate Governance for Public Companies;
35) SEOJK No. 39/SEOJK.03/2016 on the Assessment of the Capacity and Appropriateness of Prospective Controlling Shareholders, Directors, and Commissioners of Banks;
36) SEOJK No. 28/SEOJK.03/2022 on Risk Management Certification for Human Resources in Commercial Banks;
37) Ministry of State-Owned Enterprises Regulation No. PER-1/MBU/03/2023 on Special Assignments and the Corporate Social and Environmental Responsibility Program of State-Owned Enterprises;
38) Ministry of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 on Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
39) Ministry of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 on the Organ and Human Resources of State-Owned Enterprises;
40) Ministry of State-Owned Enterprises Circular Letter No. 2/MBU/07/2019 on the Management of SOEs through the Implementation of Corruption, Collusion, and Nepotism Prevention, Conflict of Interest Handling, and Strengthening of Internal Supervision;
41) BNI's Articles of Association;
42) BNI's Board of Directors Charter;
43) Various guidelines for implementing GCG, including the General Guidelines for Indonesian Corporate Governance (PUGKI) issued by the National Committee on Governance Policy (KNKG), the ASEAN Corporate Governance Scorecard (ACGS) issued by the Organization for Economic Cooperation and Development (OECD), and the Principles for Enhancing Corporate Governance published by the Basel Committee on Banking Supervision.

Correlation Between Corporate Governance Implementation and Bank Performance

CORPORATE GOVERNANCE AWARDS 2024

BNI's steadfast commitment to robust GCG implementation has garnered external recognition in the form of several awards received in 2024, including:



BUSINESS PERFORMANCE IN 2024

The consistent and sustainable application of best governance principles and practices within BNI has positively influenced the Bank's performance. This is evidenced by BNI's strong performance in 2024, achieved amidst challenging economic conditions. Notable achievements in financial and operational aspects throughout the year include:

Loan Growth
IDR 775.9 trillion
increased by 11.6%

Savings Growth
IDR 257.5 trillion
increased by 11.0%

CASA Ratio
69.9%

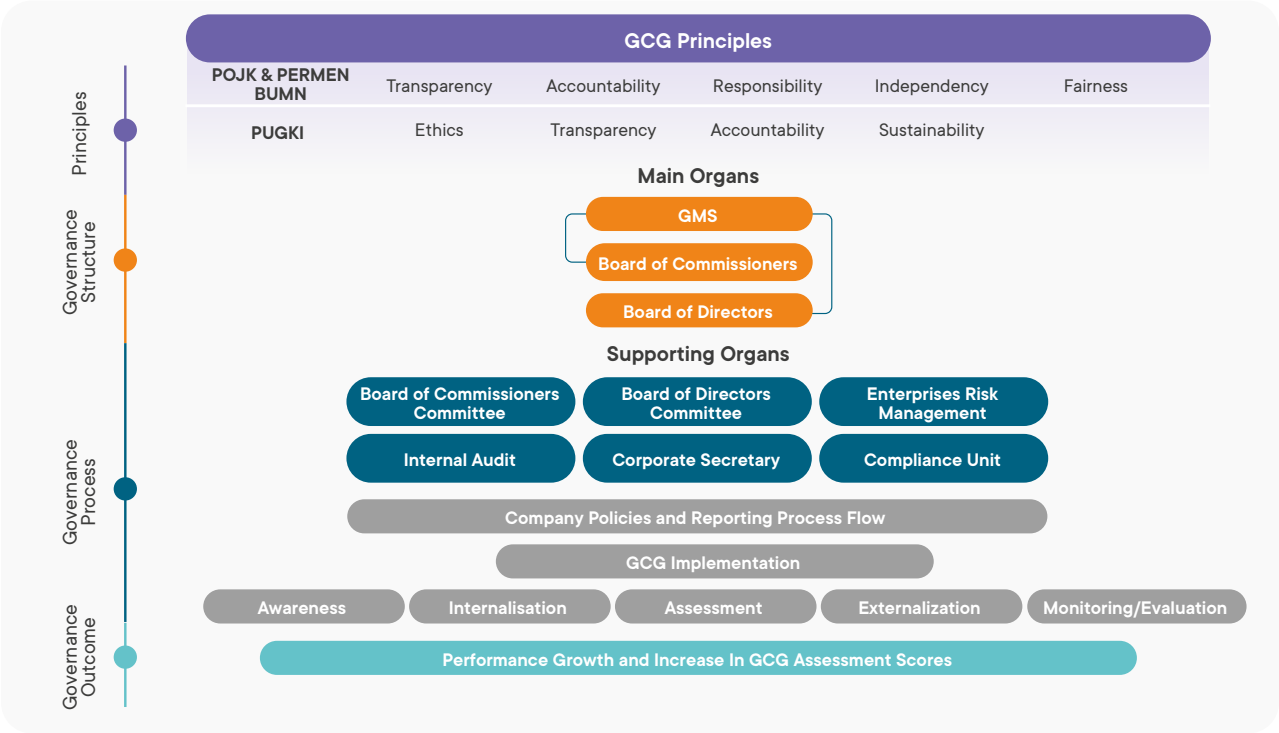
Capital Adequacy Ratio (CAR) - Bank Only
21.4%

Loan to Deposit Ratio (LDR)
96.1%

Net Income Growth
IDR 21.5 trillion
increased by 2.7%

Governance Framework

GOVERNANCE FRAMEWORK BNI



The Governance Framework serves as a conceptual structure that integrates all governance elements, from foundational principles to the ultimate objectives of implementing sound corporate governance. It is designed to provide a robust foundation underpinning every corporate action, ensuring the Company consistently, comprehensively, and sustainably applies the principles of Good Corporate Governance (GCG).

BNI's Governance Framework comprises four key elements essential for the effective implementation of corporate governance:

1) Governance Principles are the principles that guide the governance practices at BNI, namely Transparency, Accountability, Responsibility, Independence, and Fairness.
2) Governance Structure is about the adequacy of governance structures and infrastructure in ensuring the application of Good Governance principles yields outcomes aligned with stakeholder expectations. The Corporate Governance Structure encompasses key components, including the Board of Commissioners, the Board of Directors, various committees, and corporate working units. The governance infrastructure includes policies, procedures, management information systems, and the roles and functions of each organizational structure.
3) Governance Process is about the effectiveness of governance processes supported by adequate structures and infrastructure to achieve outcomes that meet stakeholder expectations.
4) Governance Outcome is the tangible results of a consistent and comprehensive implementation of corporate governance, aimed at fulfilling stakeholder expectations.

BNI continuously ensures the effective implementation of GCG across all business aspects and at every level of management and employees within the Company. This effort aims to foster a better future for the banking industry by prioritizing moral principles, ethics, and sound banking business practices.

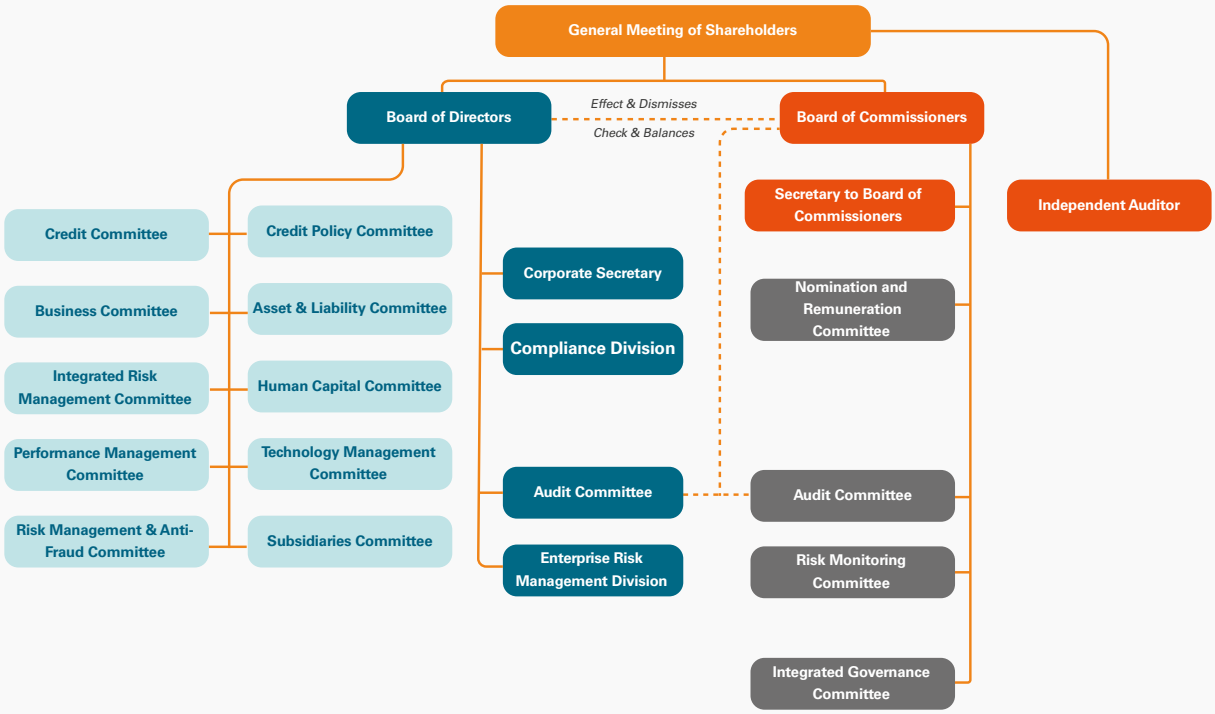
Corporate Governance Structure and Mechanism

CORPORATE GOVERNANCE STRUCTURE AND MECHANISM

BNI's GCG structure comprises primary organs, including the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors, as well as supporting organs such as committees under the Board of Commissioners, committees under the Board of Directors, the Corporate Secretary, the Internal Audit Unit, the Enterprise Risk Management Division, the Compliance Division, and the Policy Governance Division. Each organ plays a critical role in ensuring effective GCG implementation by performing its functions in accordance with the Bank's Articles of Association. This aims to enhance performance, safeguard stakeholder interests, and ensure compliance with prevailing laws and regulations.

Supported by an adequate governance framework, BNI is well-positioned to implement and continually refine its application of sound governance practices across the Bank and its subsidiaries. This commitment is a key factor in maintaining the Bank's long-term business sustainability. By conducting business ethically and responsibly while emphasizing the adoption of sound business practices, BNI remains optimistic about its ability to grow stronger, better equipped to navigate challenges, and consistently capable of accelerating its progress in an increasingly competitive business landscape.

BNI Governance Organ Structure



SOFT-STRUCTURE OF BNI GOVERNANCE

In addition to having adequate governance organs, BNI also has a comprehensive GCG infrastructure consisting of internal policy and guideline devices to enhance employee awareness to consistently pay attention to Good Corporate Governance (GCG) aspects in all ongoing business processes. The following is a list of GCG infrastructure owned by BNI according to the latest changes

1. Articles of Association No. 05, dated March 4, 2024, recorded in the Legal Entity Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia under No. AHU-AH.01.03-0079037 Year 2024, dated April 1, 2024.
2. BNI Code of Ethics as the Code of Conduct for BNI Hi-Movers.
3. Guidelines and Code of Conduct for the Board of Commissioners through Board of Commissioners Decree No. KEP/024/DK/2024, dated October 22, 2024.
4. Guidelines and Code of Conduct for the Board of Directors through BNI Board of Directors Decree No. KP/339/DIR, dated August 6, 2024
5. Audit Committee Charter and Code of Ethics approved by the Board of Commissioners through Decree No. KEP/018/DK/2024, dated June 6, 2024
6. Risk Monitoring Committee Charter approved by the Board of Commissioners through Decree No. KEP/017/DK/2024, dated June 6, 2024.
7. Remuneration and Nomination Committee Charter ratified through Decree No. KEP/019/DK/2024, dated June 6, 2024.
8. Integrated Governance Committee Charter approved by the Board of Commissioners through Decree No. KEP/016/DK/2024, dated June 6, 2024.
9. Good Corporate Governance Policy, Corporate Guidelines No. IN/097/CMP/001, dated August 28, 2024.
10. BNI Financial Conglomeration Integrated Governance Policy, Corporate Guidelines No. IN/054/CMP/001, dated May 17, 2024.
11. General Risk Management Policy, Corporate Guidelines No. IN/043/ERM/008, dated February 20, 2024.
12. General Integrated Risk Management Policy, Corporate Guidelines No. IN/029/ERM/007, dated February 20, 2024.
13. General Internal Control System Policy, Corporate Guidelines No. IN/065/ERM/009, dated August 9, 2024.
14. Internal Audit Charter through BNI Board of Directors Decree No. KP/351/DIR/R, dated August 15, 2024.
15. Conflict of Interest Handling Guidelines, Corporate Guidelines No. IN/119/CMP/001, dated December 27, 2024.
16. Corporate Secretary Guidelines ratified through Decree No. KP/356/DIR/R, dated September 2, 2016.
17. Corporate Guidelines on Prohibited and Non-Prohibited Securities Transactions for Insiders, No. IN/500/KMP/001, dated September 23, 2019.
18. Corporate Guidelines on Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Weapons of Mass Destruction Proliferation (AML CTF and PWMD), No. IN/003/CMP/001, dated February 28, 2024.
19. Corporate Procurement Guidelines No. IN/822/PGV/009, dated September 22, 2023, and No. IN/238/PGV/001, dated May 31, 2024.
20. Compliance Work Guidelines No. IN/963/KPN/002, dated December 14, 2021.
21. Whistleblowing System Guidelines No. IN/002/IAD/001, dated May 8, 2024.
22. Anti-Fraud Strategy Guidelines No. IN/003/AFR/001, dated December 9, 2024.
23. Anti-Bribery Management System Guidelines No. IN/118/CMP/006, dated December 27, 2024.
24. Gratification Control Guidelines No. IN/726/KPN/002, dated September 24, 2021.
25. Investor Relations Activity Guidelines No. IN/41/KMP/001, dated January 26, 2015.
26. Strategic Planning Guidelines: Bank Business Plan No. IN/401/REN/002, dated August 30, 2017.
27. Quality Management of Published Financial Statements Guidelines No. IN/749/PKU/002, dated September 28, 2021.
28. GCG Monitoring Activity Guidelines and Self-Assessment Report No. IN/462/KMP/001, dated October 22, 2015.

29. Credit Committee Guidelines No. IN/682/PGV/002, dated August 8, 2022; No. IN/517/PGV/004, dated July 3, 2023; No. IN/002/PGV/007, dated January 5, 2024; and No. IN/004/PGV/007, dated January 5, 2024.
30. Asset & Liability Committee (ALCO) Guidelines through Board of Directors Decree No. KP/437/DIR/R, dated September 22, 2021, concerning the Arrangement of Asset & Liability Committee (ALCO).
31. Guidelines for the Capital Risk Management & Anti-Fraud Committee through the Decree of the Board of Directors No. KP/745/DIR/R dated October 26, 2023 concerning the Arrangement of the Risk Management & Anti-Fraud Committee.
32. Guidelines for the Performance Management Committee through the Decree of the Board of Directors No. KP/353/DIR/R dated June 21, 2017 concerning the BNI Performance Management Committee (PMC).
33. Guidelines for the Integrated Risk Management Committee through the Decree of the Board of Directors No. KP/215/DIR/R dated May 31, 2024 concerning the Arrangement of the Integrated Risk Management Committee.
34. Business Committee Guidelines (KBI) through Board of Directors Decree No. KP/025/DIR/R dated January 18, 2024 concerning the Arrangement of the Business Committee (KBI).
35. Technology Management Committee Guidelines through Board of Directors Decree No. KP/364/DIR/R dated August 13, 2021 concerning the Arrangement of the Technology Management Committee.
36. Credit Policy Management Committee Guidelines through Board of Directors Decree No. KP/170/DIR/R dated April 29, 2024 concerning the Arrangement of the Credit and Business Policy Committee.
37. Human Capital Committee Guidelines through Board of Directors Decree No. KP/351/DIR/R dated August 15, 2024 concerning the Arrangement of the Human Capital Committee.
38. Subsidiary Committee Guidelines through Board of Directors Decree No. KP/067/DIR/R dated March 7, 2022 concerning the Arrangement of the Subsidiary Committee.

All policies and guidelines mentioned above are periodically disseminated to all employees and, when necessary, may be updated to remain relevant to the organization's needs and aligned with the evolving dynamics of the business.

GOOD CORPORATE GOVERNANCE MECHANISM

The Good Corporate Governance mechanism encompasses methods, procedures, and rules for implementing governance principles supported by adequate governance structures and soft structures. This ensures outcomes aligned with stakeholder expectations. In practice, effective GCG implementation requires not only governance structure pillars but also a clear soft structure to guide the process. The execution of corporate governance is intrinsically linked to the governance structure, as evidenced by the Bank's governance organizational framework.

Continuous Improvement of GCG Implementation Quality

BNI consistently evaluates the implementation of governance across all its business processes to ensure continuous quality enhancement, aligning with the evolving best practice standards of Good Corporate Governance (GCG) principles in the banking and financial services industry. Strengthening GCG practices represents a key initiative by BNI to foster growth, self-improvement, and operational excellence.These efforts aim to ensure the Bank conducts its business transparently, ethically, and responsibly.The improvements in GCG implementation quality are depicted in the following chart:

BNI GCG Implementation Sustainability Quality Improvement Cycle



The cycle of improving the quality of GCG implementation at BNI encompasses the following:

1) SETTING THE QUALITY STANDARDS OF GCG IMPLEMENTATION

To enhance the quality of GCG implementation, BNI has adopted a governance system based on best practices in sustainable management. As of the end of 2024, BNI's GCG implementation standards adhere to the Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises. Additionally, as a publicly listed entity on the Indonesia Stock Exchange under the supervision of the Indonesian Financial Services Authority (OJK), BNI's GCG standards also comply with the Financial Services Authority Regulation No. 21/POJK.04/2015 on the Implementation of Guidelines for Public Company Governance and Financial Services Authority Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks. As a crucial step in promoting the enhancement of GCG implementation quality, BNI periodically reviews global best practice standards for GCG that are applicable and relevant to the banking industry, including:

a) General Guidelines for Indonesian Corporate Governance (PUGKI) developed by the National Committee for Governance Policy (KNKG);
b) Principles of Corporate Governance for State Owned Companies developed by the Organization for Economic Co-operation and Development (OECD), namely the ASEAN Corporate Governance Scorecard (ACGS);
c) Corporate Governance Perception Index (CGPI) organized by The Indonesian Institute for Corporate Governance (IICG). CGPI is a research and ranking program for GCG implementation in companies in Indonesia;
d) Principles for Enhancing Corporate Governance issued by the Basel Committee on Banking Supervision;
e) ESG or Environment, Social, and Governance; and
f) Internalization of various laws and regulations and guidelines with national and international standards into BNI's internal policies is a commitment from the Board of Commissioners and Directors along with all employees. This commitment is manifested in the Company's vision, mission, and values and is expected to be integrated into the daily behavior of all employees.

2) GCG IMPLEMENTATION

BNI is committed to consistently enhancing the quality of GCG implementation by adhering to GCG principles in compliance with applicable laws and regulations in Indonesia while also incorporating relevant international best practices for the banking and financial services industry. With unwavering integrity, all BNI-Hi Movers personnel uphold governance practices of the highest standards across all Bank activities, ensuring a positive impact on operational performance. Furthermore, BNI leverages GCG principles as a foundation for responsible decision-making, mitigating conflicts of interest, optimizing performance, and strengthening accountability.

Implementation of GCG Based on TARIF Principles

BNI's GCG practices are founded on the five core principles of good governance: Transparency, Accountability, Responsibility, Independence, and Fairness (TARIF). The application of these principles within BNI has been evaluated for compliance with Financial Services Authority Regulation (POJK) No. 17 of 2023 on the Implementation of Governance for Commercial Banks. This commitment has been endorsed by the Board of Commissioners, Board of Directors, management, and all BNI Hi-Movers to foster a Bank that achieves sustainable growth, global competitiveness, and robust resilience in its business operations.

The following is a description of the implementation of the 5 (five) basic principles of good governance at BNI:

GCG Principles	Implementation in BNI Environment
Transparency	• The Bank discloses information in a timely, adequate, clear, accurate, and comparable manner and can be accessed by stakeholders. • The Bank discloses information transparency that includes but is not limited to the Bank's vision, mission, business objectives, strategies, financial conditions, and material information and facts that may influence investor decisions. • The principle of transparency continues to pay attention to the provisions on Bank confidentiality, official confidentiality, and protection of personal data in accordance with applicable regulations. • The Bank's policies must be written and communicated to stakeholders and other parties who have the right to obtain information about the policy.
Accountability	• The Bank sets business targets and strategies to be accountable to stakeholders. • The Bank establishes a check and balance system in the management of the Bank. • The Bank has performance measures for all organizational organs based on agreed measures and in line with the Company's values (Corporate Culture Values), business targets and strategies of the Bank and has a rewards and punishment system. • Each organ of the Bank has clear duties and responsibilities, and has competence in accordance with its responsibilities and understands its role in the implementation of Good Corporate Governance.
Responsibility	• The Bank adheres to the principle of prudence (prudential bank practices) and complies with applicable laws and regulations, articles of association and internal provisions. • The Bank as a good corporate citizen cares about the environment and carries out social responsibilities appropriately.

GCG Principles	Implementation in BNI Environment
Independence	• The Bank avoids any unreasonable domination by any stakeholder and is not influenced by certain interests and is free from conflict of interest. • The Bank makes decisions objectively and is free from any pressure from any party.
Fairness	• The Bank pays attention to the interests of all stakeholders based on the principles of equality and fairness (equal treatment). • The Bank provides an opportunity for all stakeholders to provide input and express opinions for the interests of the Bank and provides access to open information.

Implementation of GCG Based on the 2021 PUGKI Corporate Governance Pillars

In line with the evolving best practices for corporate GCG implementation standards in Indonesia, BNI regularly evaluates and updates its GCG practices by referring to the General Guidelines for Indonesian Corporate Governance (PUGKI), issued by the National Committee for Governance Policy (KNKG) in 2021 and is development of core values of TARIF, as previously described.

BNI remains committed to enhancing its internal GCG practices in line with globally recommended pillars of best corporate governance. The Bank has continuously updated its guidelines to ensure its business activities align with the objectives and needs of all stakeholders. This alignment fosters mutual trust and creates a harmonious environment within the Bank, promoting a culture of excellence and professionalism among all BNI employees.

In the long term, BNI recognizes that the application of good corporate governance (GCG) principles is vital to enhancing investor and stakeholder confidence, lowering capital costs, strengthening the capital markets and financial services sector, creating more employment opportunities, and driving economic growth in alignment with sustainable development principles.

The following are 4 (four) pillars of corporate governance as outlined in the 2021 PUGKI, which have been adopted by BNI:

4 (Four) Pillars of Indonesian Corporate Governance



Pillars of Corporate Governance	Explanation	Implementation in BNI Environment
Ethical Behavior	In carrying out its activities, the corporation always prioritizes honesty, treats all parties with respect, fulfills commitments, builds and maintains moral values and trust consistently. The corporation pays attention to the interests of shareholders and other stakeholders based on the principles of fairness and equality and is managed independently so that each company organ does not dominate each other and cannot be intervened by other parties.	• The Bank is committed to internalizing the principles of Indonesian corporate governance in values, work culture, strategies, operational policies, and operational systems and procedures. This commitment is reflected in the signing of the Integrity Pact of the Board of Commissioners, Directors and all employees which is carried out periodically every year. • All Shareholders including Minority Shareholders and Foreign Shareholders are treated equally and fairly (equal treatment). In addition, all stakeholders are given the same opportunity to obtain information and submit criticism/suggestions to the Bank.
Accountability	Corporations can be held accountable for their performance in a transparent and fair manner. Therefore, Corporations must be managed properly, measurably and in accordance with corporate interests while still taking into account the interests of shareholders and stakeholders. Accountability is a prerequisite for achieving sustainable performance.	• The Bank sets business targets and strategies to be accountable to stakeholders. • The Bank establishes a check and balances system in managing the Bank. • The Bank has performance measures for all organizational organs based on agreed measures and in line with the Company's values (Corporate Culture Values), business targets and strategies of the Bank and has a reward and punishment system. • Each Bank organ has competence in accordance with its responsibilities and understands its role in implementing the principles of Indonesian corporate governance
Transparency	To maintain objectivity in conducting business, corporations provide material and relevant information in a way that is easily accessible and understood by stakeholders. Corporations take the initiative to disclose not only issues required by laws and regulations, but also matters that are important for decision-making by shareholders, creditors, and stakeholders.	• Banks disclose information in a timely, adequate, clear, accurate, comparable and accessible manner to stakeholders • Banks disclose information disclosures that include but are not limited to the Bank's vision, mission, business objectives, strategies, financial conditions, and material information and facts that can influence investor decisions. • The principle of transparency continues to pay attention to the Bank's confidentiality provisions, official confidentiality, and protection of personal data in accordance with applicable regulations. • Bank policies must be written and communicated to stakeholders and other parties who have the right to obtain information about the policy.
Sustainability	The Corporation complies with laws and regulations and is committed to carrying out its responsibilities towards society and the environment in order to contribute to sustainable development through cooperation with all relevant stakeholders to improve their lives in a manner that is in line with business interests and the sustainable development agenda.	• The Bank integrates corporate strategy with sustainability values that consider the balance of environmental, social, and governance, as well as economic aspects. • In its implementation, the Bank also builds a comprehensive sustainability culture in every work unit so that green banking practices can be implemented optimally. • The Bank has formed an Environment, Social & Governance (ESG) Sub-Committee under the Risk Management & Anti-Fraud Committee, as well as a special department in the Enterprise Risk Management (ERM) Division to oversee sustainability practices at the Bank. • The Bank has considered Environmental, Social and Governance factors, and included sustainability principles in the Company's Code of Ethics, policies, and guidelines. • The Bank conducts various internal programs to ensure sustainable implementation, including the socialization of the Indonesian Green Taxonomy (THI) to business units, implementation of Environmental, Social, and Governance (ESG)-based training, Go Green initiatives, mandatory e-learning programs, and increasing ESG awareness through the BNI website and various communication channels such as Youtube and email blasts.

Footprints of GCG Implementation at BNI

Year	Activities and Events
2001	BNI is committed to implementing GCG practices with the best standards. This commitment was pioneered by the Board of Commissioners and Board of Directors of BNI through the signing of the Joint Decree of the Commissioners and Board of Directors No. KEP/001/DK and KP/001/DIR dated January 3, 2001 concerning the Implementation of Good Corporate Governance Principles as stated in the Corporate Governance Handbook of PT Bank Negara Indonesia (Persero) Tbk which was then used as a guideline for the Board of Directors and Commissioners to manage BNI.
2002	As part of its commitment to continuously improve the implementation of corporate governance, BNI has carried out the following activities: 1) Establishing a Compliance Unit and an Anti-Money Laundering Unit under the responsibility of the Legal and Compliance Division; 2) Establishing a Remuneration and Nomination Committee that has the role and responsibility to prepare performance assessment criteria for each member of the Board of Commissioners and Board of Directors and to assess the structure, system, and implementation of compensation for the Board of Directors and provide suggestions for changes to the Board of Commissioners if requested; 3) Establishing an assessment center to improve the process/system for selecting executive positions; 4) Improving the banking information system; and 5) The Board of Commissioners has established an Audit Committee Charter as a guide for members of the Audit Committee in carrying out their duties.
2003	BNI maintains its consistency in making improvements in various aspects, both in terms of commitment and compliance with its implementation. To ensure this, every employee is required to sign a statement of compliance with the Code of Ethics. As one of BNI's concrete efforts to improve the quality of GCG implementation, in 2003, BNI formed an Executive Committee tasked with assisting the Board of Directors in certain areas, including: 1) Asset & Liability Committee (ALCO). 2) Risk Management Committee. 3) Credit Policy Committee. 4) Human Resources Committee. 5) Technology Management Committee.
2004	The following are BNI's important achievements in the field of GCG implementation during 2004: 1) BNI Management approved the establishment of a Good Corporate Governance Committee tasked with assisting the Board of Directors in evaluating and optimizing the effectiveness of GCG policies and implementation in BNI's work environment. 2) BNI was assessed as one of five public companies with good Corporate Governance practices in a survey conducted by Standard & Poor's Governance Services and the Corporate Governance and Financial Reporting Center (CGFRC) headquartered in Singapore. 3) Management implemented a Zero Fraud program to foster healthy and responsible banking practices, risk awareness, and close supervision of deviant behavior. Through this program, BNI rewards work units that succeed in achieving Zero Fraud in their operations and conversely sanctions work units that fail to prevent Fraud. 4) BNI formed a Work Ethics Team that works under the Human Resources Committee. Periodically, this team evaluates the progress of work ethics in BNI's work environment. 5) BNI improves stakeholders' access to all information that has a material impact on BNI, including quarterly financial reports, annual reports, information on the use of funds from corporate actions, information that can influence investors' investment decisions, results of General Meetings of Shareholders, and other important events concerning BNI, both through the BNI website, reports to the OJK, Stock Exchange, mass media, public exposure, and analyst meetings.
2005	BNI's commitment to implementing GCG is proven through the establishment of a GCG Monitoring organizational unit through the Decree of the Board of Directors No. KP/174/DIR/R dated April 26, 2005.
2006	Signing of the 'Statement of Commitment to Implement Good Corporate Governance' by all Directors, Board of Commissioners, and Division Leaders at the Company's Work Meeting, which was then attended by all employees at all levels of the organization and renewed annually.
2007	As a follow-up to the signing of the 'Statement of Commitment to Implement Good Corporate Governance' in the previous year, BNI has prepared a GCG program including: 1) GCG e-learning. 2) BNI Commissioners and Directors' Guidelines and Work Procedures. 3) BNI Human Behavior Requirements Book, which consists of BNI Human Work Culture Values and Main Behaviors called PRINCIPLE 46. 4) BNI received the title of Trusted Company in the Corporate Governance Perception Index ranking held by The Indonesian Institute for Corporate Governance (IICG) and SWA magazine.
2008	In order to strengthen the implementation of the Know Your Customer Principle (PMN) and the implementation of the Money Laundering Crime Law (UU TPPU), the Compliance Division in collaboration with the Information Technology Division developed and continued to refine a system integrated with the iCONS system to identify suspicious financial transactions.
2009	BNI has succeeded in improving its performance which has resulted in an increase in profit of up to 103% compared to the previous year. This is inseparable from the consistent implementation of GCG by all BNI employees.

Year	Activities and Events
2010	Launching an integrated Whistleblowing System (WBS) so that transparency is maintained and its implementation is understood by all BNI employees. Improvement of the BNI employee code of conduct aimed at improving the quality of BNI employees. BNI's participation in the GCG implementation ranking conducted by independent rating agencies, namely the Center for Good Corporate Governance, Universitas Gadjah Mada (CGCG UGM), and The Indonesian Institute for Corporate Directorship (IICD).
2011	BNI has successfully won a number of awards from various national and international institutions, including: 1) Best of The Best Company BUMN 2011. 2) The Most Admired ASEAN Enterprise Economics Challenges Award 2011. 3) Most Trusted Company from The Indonesian Institute for Corporate Governance (IICG). 4) BNI's information technology governance has been recognized for its reliability by being awarded the IT Governance Award by the Ministry of BUMN.
2012	1) The results of the self-assessment according to Bank Indonesia regulations in 2011 and 2012 showed a stable trend with a composite predicate of Very Good. 2) The establishment of the Anti-Fraud Unit Committee which was formed based on the Decree of the Board of Directors No. KP/508/DIR/R dated November 9, 2012 concerning the Establishment of the Anti-Fraud Unit Committee (KAF). In carrying out its duties and responsibilities, KAF is assisted by the Ethics Management Unit in the Compliance Division, one of whose functions is as a data liaison and reporting with other Divisions/Units and external parties related to the Anti-Fraud Strategy and managing the fraud-related database in BNI.
2013	BNI has successfully won a number of awards from various national and international institutions, including: 1) Most Trusted Company Based on Investors and Analysts Assessment Survey at the Good Corporate Governance Award 2013. 2) Most Trusted Company Based on Corporate Governance Perception Index (CGPI) at the Good Corporate Governance Award 2013. 3) Award as The Best Bank in Indonesia in Developing Good Corporate Governance (GCG) from Asiamoney Magazine.
2014	In addition to focusing on improving the quality of GCG implementation, BNI also continues to strive to increase its contribution to support economic and environmental growth by organizing a number of programs such as Kampoeng BNI, Partnership and Community Development Program, CSR activities organized by BNI Syariah, and commitment to the One Billion Indonesian Trees (OBIT) program which has planted more than 7 million trees in the last 7 years.
2015	BNI successfully won the award as "The Best State Owned Enterprise and Top 50 Public Listed Companies" at the Good Corporate Governance Award event organized by The Indonesian Institute for Corporate Directorship (IICD).
2016	BNI successfully won a number of awards from various national and international institutions, including: 1) The Best State Owned Enterprise and Top 50 Public Listed Companies at the Good Corporate Governance Award event organized by the Indonesian Institute for Corporate Directorship (IICD). 2) Most Trusted Company Based on Corporate Governance Perception Index (CGPI) at the 2016 Good Corporate Governance Award.
2017	BNI has won several awards from various national and international institutions, including: 1) 1st Place in the Listed Financial BUMN Category in the 2016 Annual Report Award event. 2) The Best State Owned Enterprise and Top 50 Public Listed Companies in the Good Corporate Governance Award event held by The Indonesian Institute for Corporate Directorship (IICD). 3) Most Trusted Company Based on Corporate Governance Perception Index (CGPI) at the 2017 Good Corporate Governance Award.
2018	BNI has won several awards from various national and international institutions, including: 1) The Best State Owned Enterprise and Top 50 Public Listed Companies in the Good Corporate Governance Award event held by the Indonesian Institute for Corporate Directorship (IICD). 2) Most Trusted Based on Corporate Governance Perception Index (CGPI) at Good Corporate Governance.
2019	BNI's hard work in maintaining the implementation of GCG in accordance with best practices, provisions, and applicable standards has succeeded in bringing BNI to win a number of prestigious awards, including: 1) The Best State Owned Enterprise and Top 50 Public Listed Companies in the Good Corporate Governance Award event held by the Indonesian Institute for Corporate Directorship (IICD). 2) Most Trusted Based on Corporate Governance Perception Index (CGPI) in Good Corporate Governance. 3) The Best Good Corporate Governance Issuer from IDX Channel. In 2019, BNI began implementing digitalization in the implementation of Board of Directors Meetings and the implementation of GCG commitments for all BNI Hi-Movers. In an effort to improve the implementation of GCG, the Company is also actively collaborating with external institutions IICD in order to improve the implementation of GCG at BNI.

Year	Activities and Events
2020	BNI always strives to continue to make improvements and innovations to realize one of BNI's missions "To be a reference for the implementation of compliance and good Corporate Governance for the Industry". These efforts have received recognition and awards from external and independent parties in the form of: 1) Award as the "Most Trusted Company" from The Indonesian Institute for Corporate Governance (IICG). 2) Predicate as a "Very Good" company in implementing GCG based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesian Institute for Corporate Directorship (IICD). 3) The Best GRC Overall for Corporate Governance & Performance 2020 (International Trade & Corporate Banking) at the GRC (Governance, Risk & Compliance) & Performance Excellence Award 2020 held by Businessweek Indonesia and the CEO Forum. 4) Award for Rank I Gratification Control Unit (UPG) in the State-Owned Enterprises (BUMN)/Regional-Owned Enterprises (BUMD) Category from the Corruption Eradication Commission (KPK).
2021	BNI has won several awards from various national and international institutions, including: 1) Award as the "Most Trusted Company" from The Indonesian Institute for Corporate Governance (IICG). 2) Predicate as a "Very Good" company in implementing GCG based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesian Institute for Corporate Directorship (IICD). 3) 2nd place winner of The Best Indonesia GCG Award VI-2021 in the Public Company - Book IV Bank category organized by the Economic Review. 4) Achievement of a score of 100 for the implementation of the 2021 Gratification Control Program from the KPK. Other achievements in the field of GCG carried out by BNI during 2021 to improve the quality of GCG implementation internally, include: 1) Changing GCG management to be under the coordination of two divisions or work units, namely the Compliance Division and the Corporate Secretary. This is done so that GCG management, both individually and integrated, is more effective. 2) Signing of the Cooperation Agreement (PKS) between BNI and the Corruption Eradication Commission regarding Handling Complaints in Efforts to Eradicate Criminal Acts of Corruption based on PKS No. 67 of 2021 and No. DIR/153 dated March 2, 2021, which aims to build and improve the effectiveness and efficiency of handling complaints both internally and externally which are integrated by prioritizing confidentiality in order to optimize the eradication of criminal acts of corruption in the work environment. 3) Approving the establishment of the Anti-Fraud Unit based on the Decree of the Board of Directors No. KP/291/DIR/R dated June 28, 2021 concerning the establishment of the Anti-Fraud Unit Organization (SAF) which aims to improve the implementation of the Anti-Fraud Strategy at BNI through prevention, detection, investigation, reporting, and sanctions, monitoring, and evaluation activities.
2022	BNI has received a number of awards from various national and international institutions, including: 1) Award as "The Most Trusted Companies" from The Indonesian Institute for Corporate Governance (IICG). 2) Award as "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD). 3) Achievement of a score of 100 for the implementation of the Gratification Control Program in 2022 from the KPK. Other achievements in the field of GCG carried out by BNI during 2022 to improve the quality of GCG implementation internally include: 1) Signing of Integrity Pact by all employees as a manifestation of the implementation of AKHLAK, Principle 46, and RACE. 2) Establishment of ESG Implementation Coordinator Group at BNI based on Decree No. REN/2/173/R dated June 30, 2022 and Appointment of Consultant in order to assist the process of preparing framework, roadmap, and implementation of ESG at BNI.
2023	BNI has won several awards from various national and international institutions, including: 1) Award as "The Most Trusted Companies" from The Indonesian Institute for Corporate Governance (IICG). 2) Award as "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD). 3) Annual Report Award (ARA) 2022 and ranked second in the BUMN Finance category. Other achievements in the field of GCG carried out by BNI during 2023 to improve the quality of GCG implementation internally, include: 1) Implementation of the New Way of Working (NWOW) initiative as a form of supporting the increasingly rapid business development process, as well as increasing employee productivity by changing the way of working to be more agile. 2) In order to strengthen the internal control system, BNI formed the Operational Risk Management (ORM) Division and Senior Operational Risk Executive (SORX) consisting of 4 (units) functional units, namely. SORX Wholesale Banking, SORX Network & Services, SORX Consumer Banking & Corporate Function and SORX Technology, Digital & Operations.

Year	Activities and Events
2024	Improvement of governance quality that has been carried out: 1) Award as "The Most Trusted Companies" from The Indonesian Institute for Corporate Governance (IICG). 2) Award as "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD). 3) Winner of the BUMN Finance category in the 2023 Annual Report Award (ARA). 4) Award for Informative Qualification of State-Owned Enterprises in 2024 from the Central Information Commission (KIP). 5) Re-certification of ISO 37001 Anti-Bribery Management System (SMAP). 6) Formation of a Data Protection Officer (DPO) under the Compliance Division in order to implement the PDP Law.

3. MONITORING GCG IMPLEMENTATION

Person in Charge of GCG Implementation

The Compliance Division and Corporate Secretary Division are in charge of all accountability pertaining to GCG implementation at BNI. In this instance, the individual in charge of BNI's GCG implementation is charged with making sure the Bank has acted responsibly and in conformity with the highest ethical standards. The Board of Directors directly appoints the individual in charge of GCG implementation By means of Board of Directors Decree No.KP/133/DIR/R dated April 7, 2021.

Throughout 2024, the Compliance Division and Corporate Secretary Division have carried out a series of GCG implementation monitoring activities, including:

a) Signing of the Good Corporate Governance Integrity Pact by the Board of Directors, Board of Commissioners and all employees.
b) Monitoring and evaluation of GCG implementation and internal control.
c) Know Your Employee (KYE) as one of the inherent supervision efforts for employees to ensure that fraud does not occur by considering whether there are indications that require further attention (irregularities).
d) Encourage the implementation of the Governance, Risk and Compliance (GRC) forum consistently both in BNI and its Subsidiaries.

4. MEASUREMENT/ASSESSMENT OF GCG IMPLEMENTATION

Periodically, the GCG implementation is evaluated to make sure BNI has conducted banking activities in compliance with industry-relevant laws, rules, and business ethics standards. GCG assessments are thought to be advantageous for the Bank's internal interests as well as for fostering a high degree of transparency in the Bank's choices and actions. This helps to preserve stakeholder trust and serves as the foundation for forging solid bonds between the Bank and the various parties. In order to get more impartial and unbiased evaluation results, BNI periodically evaluates the quality of GCG implementation, both on its own (self-assessment) and in cooperation with outside parties.

Self Assessment

A. Assessment Procedure

Every semester, a self-assessment on BNI's governance principles is conducted in compliance with the following guidelines:

a) POJK No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks; and
b) Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks.

GCG assessment is carried out in a comprehensive and structured manner, covering 3 (three) aspects, namely: (1) Structure, (2) Process, and (3) Results, by considering 11 (eleven) Governance Implementation Assessment Factors. The three aspects are described as follows:

(1) **Governance Structure**

The goal of the governance structure assessment is to determine if the Bank's infrastructure and governance structure are enough to ensure that the application of good governance principles yields results that meet stakeholder expectations. BNI's Governance Structure consists of the Board of Commissioners, Board of Directors, Committees, and work units in the Bank. Meanwhile, what is included in BNI's Governance infrastructure includes the Bank's policies and procedures, management information systems, and the main tasks and functions of each organizational structure.

(2) **Governance Process**

The assessment of the Governance process aims to assess the effectiveness of the process of implementing good governance principles supported by the adequacy of the Bank's governance structure and infrastructure so that it shows results that are in accordance with the expectations of stakeholders.

(3) **Governance Outcome**

The assessment of Governance results aims to assess the quality of outcomes that meet the expectations of stakeholders which are the results of the process of implementing good corporate governance principles and supported by the adequacy of the Bank's governance structure and infrastructure.

B. Assessment Criteria

In 2024, BNI conducted a self-assessment of the implementation of Good Governance in accordance with SEOJK No. 13/SEOJK.03/2017 covering 11 (eleven) factors consisting of:

a) Implementation of the duties and responsibilities of the Board of Commissioners;
b) Implementation of the duties and responsibilities of the Board of Directors;
c) Completeness and implementation of the Committee's duties;
d) Handling conflicts of interest;
e) Implementation of the compliance function;
f) Implementation of the internal audit function;
g) Implementation of external audit function;
h) Implementation of risk management including internal control system;
i) Provision of funds to related parties and provision of large exposure funds;
j) Transparency of the Bank's financial and non-financial conditions, Good Corporate Governance implementation reports and internal reporting; and
k) Bank's Strategic Plan.

C. Parties Conducting Assessments

The Board of Commissioners, Board of Directors, and associated divisions are responsible for producing a thorough and organised evaluation of the efficacy of Bank Governance as part of the self-assessment of the implementation of Good Governance within BNI.

D. Assessment Results

Self Assessment

Based on the results of the self-assessment of the implementation of BNI Governance for the last 3 (three) years, the following are:

Description	2024	2023	2022
Composite Value	2	2	2

In Semester I/2024, BNI has conducted an individual GCG self-assessment and has submitted it to OJK, with the assessment results as follows:

GCG Implementtion Self Assessment Results for Semester I/June 2024		
Rating	**Rating Definition**	**Trend**
2	Demonstrates the general application of good governance by bank management. The proper use of governance concepts reflects this. If there are flaws in the way governance principles are being used, bank management can usually fix them with standard procedures.	Stable

In semester II/2024, BNI has conducted a GCG self-assessment and has submitted it to OJK, with the assessment results as follows:

GCG Implementtion Self Assessment Results for Semester II/December 2024		
Rating	**Rating Definition**	**Trend**
2	Demonstrates that Bank Management has implemented Good Governance in general. This is reflected in the adequate fulfillment of Governance principles. In the event of weaknesses in the implementation of Governance principles, generally these weaknesses can be resolved with normal actions by Bank Management.	Stable

Based on the ranking determination above, the implementation of GCG implementation at BNI during 2024 can be explained as follows:

Strength of Corporate Governance implementation

i. Governance Structure

The governance structure has met the requirements set, has been equipped with policies and systems, and has been supported by related work units such as audit, compliance, and risk management so as to support the implementation of governance at BNI.

ii. Governance Process

The process of implementing governance, in which decisions are made using the established business strategy as a guide and the principles of governance, has been executed well.

iii. Governance Outcome

The principles of governance have been implemented in the bank's business activities, information disclosure is carried out based on the principle of openness, and data and reports are submitted in accordance with applicable provisions.

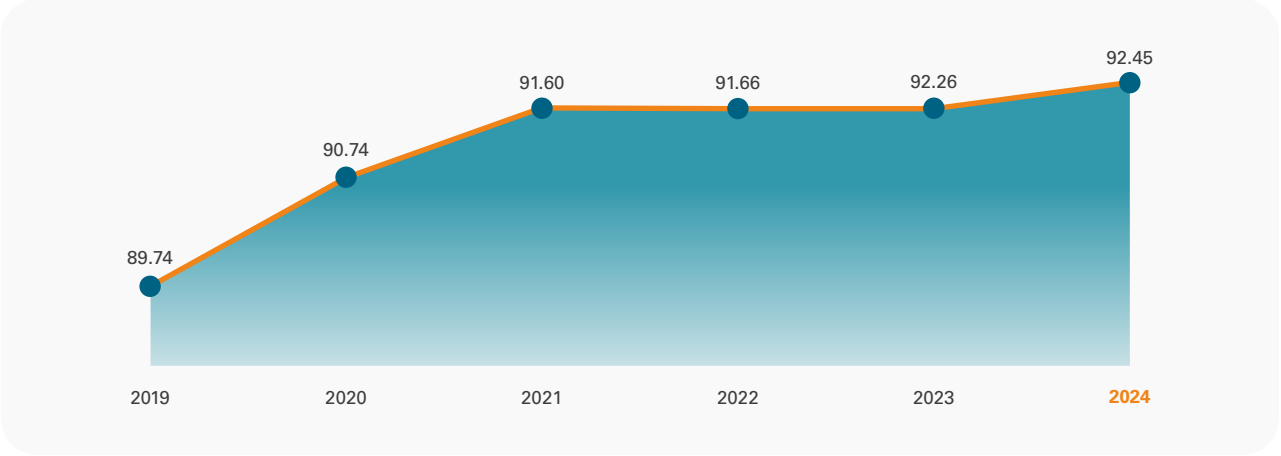
Improvement of Corporate Governance implementation

Weaknesses that occur in the governance structure, process and outcome have been followed up, improvements/developments have been made, and the internal control system has been strengthened, so as not to disrupt the company's operations.

EXTERNAL ASSESSMENT DURING THE LAST 3 YEARS

i. Corporate Governance Perception Index (CGPI)

Using the findings of the Corporate Governance Perception Index (CGPI) evaluation carried out by The Indonesian Institute for Corporate Governance (IICG) as one of the guidelines for enhancing the implementation of sustainable governance principles is one way that BNI keeps improving the application of good governance principles. The application of the CGPI assessment employs a stakeholder perspective, where relationships with all stakeholders are becoming more and more crucial in preserving the company's long-term business continuity, as well as a reference for the implementation of generally applicable best practices and mandatory GCG. The results of the Bank's CGPI assessment for the 2023 financial year which was carried out in 2024 showed good achievements and received the title of «The Most Trusted Company». This is also in line with the compliance with all requirements and stages of the CGPI assessment. The following is the trend of CGPI assessment results for the last 5 (five) years:



CGPI Assessment Results for Financial Year 2022-2024

Indicator	2024	2023	2022
Governance Structure	30.71	30.67	25.69
Governance Process	30.92	30.31	35.00
Governance Outcome	30.82	31.28	30.97
Skor CGPI	92.45	92.26	91.66

Based on the results of the CGPI assessment above, it can be concluded that the implementation of GCG at BNI has shown good results as reflected in the assessment trend which continues to increase from year to year. The following are recommendations obtained by BNI from the results of the CGPI assessment for the 2024 financial year and its follow-up:

No.	Recommendations	Follow-up
Governance Structure Aspects		
1.	BNI needs to periodically update the Company's policies and strategies through a comprehensive risk-based analysis related to the dynamics of the business and industry environment in order to optimize the company's potential as an entity or consolidated in the Company group.	• The process of adjusting and improving policies has always been carried out by considering applicable laws and regulations, best practices, bank strategies, and business needs. • The Bank has prepared a strategic plan including a business group in the form of a Corporate Plan for a period of 5 (five) years and a Bank Business Plan (RBB) for a period of 3 (three) years which is prepared annually (rolling adjustment). The preparation of the plan refers to the Company's Vision and Mission, Shareholder Aspirations, regulatory provisions and company guidelines and considers external factors, internal factors and aspects of bank risk management so as to illustrate the Bank's sustainable growth in accordance with industry dynamics.
2.	BNI needs to optimize data governance policies in accordance with applicable laws and regulations and refer to best practices and be aligned with the Company's strategic plan.	BNI continues to develop aspects of data governance to support the achievement of the Vision in a sustainable manner. With the Data Management & Analytics (DMA) Division which has the function of producing advanced analytics output in business and risk aspects that provide significant contributions to all business segments and Subsidiaries while still meeting regulatory compliance aspects. BNI continues to improve aspects of data management, modernize reports in the form of dashboards and quality system and HR capabilities so that it is expected to improve the quality of analysis results that assist in decision making.
Governance Process Aspects		
1.	BNI needs to optimize the implementation of a comprehensive risk culture and evaluate its implementation so that it can become a strong foundation to optimize the potential and sustainable business growth while still being in accordance with the established risk appetite.	BNI has a risk management framework that starts from determining the risk strategy and risk appetite that are in line with BNI's business strategy and objectives. Risk management is carried out based on a risk operating model that includes governance, processes, policies, and tools and methodologies. Risk management is supported by adequate Information Technology, adequate quality and quantity of HR, and strengthening risk awareness through internalization of risk culture. A strong risk culture is needed so that BNI management and employees have the same values and perceptions of risk. In order to maintain and improve risk culture, BNI requires BNI management and employees, among others, to work based on the principle of prudence, and to uphold Bank and job secrets. In addition, to improve risk culture and awareness, several efforts have been made, including socialization, training, and mentoring of Subsidiaries and Overseas Offices (KLN) in implementing risk management.
2.	BNI needs to always maintain the reliability and level of security of data, networks, systems and information technology used so that it is free from the risk of hacking and misuse by unauthorized parties.	BNI continues to strengthen cybersecurity by making various efforts to realize its commitment to protecting customer data and maintaining the sustainability of IT operations to remain safe. Some of the strengthening efforts carried out by BNI include: - Developing the CISO function - Implementing governance, regulation and compliance - Implementing information security architecture for assets, data, applications, endpoints, networks and security parameters - Conducting information security audits with ISO 27001:2013 Certification

No.	Recommendations	Follow-up
Governance Outcome Aspects		
1.	BNI needs to progressively handle all legal cases currently being faced and strive for optimal risk mitigation for all lawsuits, as well as prevent the Company's legal cases from recurring.	BNI consistently strives to minimize legal risk by having a system and mechanism for handling and resolving legal problems faced by the Company and mitigating the risk of lawsuits, including providing legal review on the credit proposal process decided by the Credit Committee, optimizing the function of the legal work unit at the Head Office and Regional Offices, and legal risk awareness through webinars or sharing sessions.
2.	BNI needs to improve the handling of complaints received from various sources to increase the trust of the Company's stakeholders.	BNI is always committed to paying attention to consumer and stakeholder protection by providing the best service and product delivery according to customer needs and as a form of compliance with regulators. As a concrete manifestation of customer protection commitment, BNI has a consumer protection policy and formed a Consumer Protection Department under the Customer Experience Center Division. In order to implement Law No. 27 of 2022 concerning Personal Data Protection, BNI has formed a Personal Data Protection Officer (DPO) who is responsible for monitoring and ensuring compliance with Personal Data Protection.

ii. ASEAN Corporate Governance Scorecard (ACGS)

For the past few years, BNI has conducted external assessments of Good Governance practices based on the ASEAN Corporate Governance Scorecard (ACGS) criteria that adopt the principles of Corporate Governance from The Organisation for Economic Cooperation and Development (OECD). In order to enhance governance standards and practices, particularly for ASEAN public firms, ACGS is a member of the ASEAN Corporate Governance Initiative, which was started by the ASEAN Capital Markets Forum (ACMF) and is also backed by the Asian Development Bank (ADB). In order to make it easier to identify ASEAN enterprises with sound governance, one of the ACMF's top aims is to draw in foreign investors.

A. Assessment Procedure

The ACGS assessment procedure is carried out through a review of English-language documents and information provided by the Bank to the public, including information contained in the Annual Report, website, announcements and circulars made by listed companies.

B. Assessment Criteria

The latest ACGS assessment criteria for March 2024 consist of criteria aspects that include (i) Rights and Equitable Treatment of Shareholders, (ii) Sustainability Resilience, (iii) Disclosure and Transparency, and (iv) Responsibilities of the Board.

C. Parties Conducting the Assessment

The assessment is conducted by ACMF through the Domestic Ranking Body (DRB) appointed by the regulator of each country as a representative in each participating country. The DRB conducts assessments on a national scale, to be further peer reviewed by the DRBs of other ASEAN member countries. Since 2016, OJK has appointed PT RSM Indonesia Konsultan (RSM) as the DRB to conduct assessments in Indonesia. In addition, the ACGS assessment in Indonesia is also conducted by the Indonesian Institute for Corporate Directorship (IICD).

D. Assessment Results

In 2024, BNI received the ACGS assessment results from IICD, with a score of 115.56 and received the predicate "Leadership in Corporate Governance" or Level 5. Based on this score, BNI's business practices as a whole have adopted international standards.

No.	Assessment Components	Fiscal Year 2024
1.	Shareholder Rights and Equal Treatment	18.00
2.	Sustainability and Resilience	14.32
3.	Disclosure and Transparency	23.53
4.	Board of Commissioners and Board of Directors Responsibilities	38.71
5.	Bonus	23
6.	Penalty	(2)
	Total Score	**115.56 (Leadership in Corporate Governance)**

5) IMPROVING THE QUALITY OF GCG IMPLEMENTATION AND BENCHMARKING

Strategic Initiatives to Strengthen GCG Implementation

BNI continuously exhibits diligence and attempts to raise the standard of internalisation of GCG principles. To promote GCG implementation practices inside the Bank, BNI has developed a roadmap that serves as a reference for the strategic plan it has developed to achieve the best GCG standards. BNI's concrete steps in improving the quality of GCG implementation in a sustainable manner are realized in the following ways:

a) Review of guidelines/policies related to Corporate Governance, to be adjusted to external provisions and current best practices, including the Good Corporate Governance (GCG) Policy, Dividend Policy, Board of Directors Charter, Board of Commissioners Charter, Board of Commissioners Committee Charter (Audit Committee, Risk Monitoring Committee, Nomination & Remuneration Committee, and Integrated Governance Committee), as well as the Internal Audit Charter;

b) Improving the quality of GCG implementation through the improvement of the Compliance Index including its calculation method, the Gratification Control Program and Anti-Bribery Management System (SMAP) and the implementation of the Governance, Risk and Compliance (GRC) Forum in all Units, monitoring Key Performance Indicators (KPI) and Know Your Employee (KYE), and the implementation of boom and booster in operational and business assessments; and

c) BNI's participation in GCG assessments by independent external parties as a means of strengthening GCG implementation in BNI, including IICG and ACGS.

Awareness

A. GCG Socialization

Socialization related to the implementation of GCG is an important part that cannot be left out because it plays a major role in determining the success of implementing good governance in an organization. Therefore, BNI has included a planned and structured agenda for socializing the implementation of GCG in trainings provided to all BNI employees. The socialization activities include the presentation of materials on the definition, principles, implementation and efforts to improve GCG. With this socialization, it is hoped that BNI Hi-Movers will have the determination and shared commitment to realizing the implementation of GCG in BNI.

B. New Employee Induction Program

ADP, BINA BNI, Officer Development Program (ODP), Standard Credit Analyst, and Consumer RM are among the training programs that BNI consistently offers to newly hired staff members. In order for each employee to hopefully learn, develop, and grow with the Bank, it is necessary to make sure that their vision, mission, and leadership qualities align with BNI. In order to prepare the greatest talent for the future, BNI offers new hires comprehensive training resources, particularly with regard to the values and application of GCG principles and Corporate Values, which can be helpful in each employee's career path at BNI.

C. Internalization

To ensure that every BNI employee always acts in accordance with the code of ethics and corporate cultural values, BNI has an internalization program that includes learning related to the implementation of Corporate Governance principles at BNI by optimizing various existing tools to facilitate the adoption process of values that can later be applied in daily work. Some of the tools used include:

1) Reading of Beliefs and BNI Code of Ethics on every quality day in each unit and at morning briefings;
2) Self-education method through e-learning GCG and DEEP 46 (Daily Exercise Employee Program) through BNI Smarter and DigiHC which provide easy GCG learning for BNI Hi-Movers;
3) Webinars with speakers involving internal and external professionals, including:
   a. Personal Data Protection;
   b. Governance, Risk and Compliance;
   c. Anti Fraud Awareness
4) Distribution and installation of posters and e-leaflets on gratification control and GCG enforcement in each unit, BNI Forum, website;
5) Ease of access to the Code of Ethics and Corporate Culture through the BNI website which can be accessed anytime and anywhere;
6) Anti-Gratification and Anti-Fraud Commitments delivered by the Board of Directors through video media;
7) Learning modules in various formats such as e-books, podcasts, bite-size video learning, and gamification; and
8) Implementation of the Compliance Forum with the theme "Realizing an Anti-Corruption Culture through Instilling Integrity Values" attended by the Board of Directors, Board of Commissioners, SEVP, Subsidiaries and all employees.

D. Externalization

In an attempt to modify its implementation in line with emerging best practices relevant to the banking and financial services sector, BNI externalises GCG. GCG externalization is closely related to the principles of transparency and fairness, where the principle of openness pays attention to the provisions of Bank secrecy, job secrecy and provides equal opportunities according to their proportions to stakeholders and the public. BNI implements GCG externalization to stakeholders and the wider community through various means, namely as follows:

1) GMS

GMS functions as a formal communication channel between stakeholders and the Bank, as well as implementation of GCG principles, given that the GMS also outlines the duties of the Bank's management from a number of aspects. The GMS Section of the Corporate Governance Chapter of this Annual Report provides a more thorough explanation of the GMS.

2) Disclosure and Transparency

In order to uphold the principle of transparency, BNI opens the widest possible access to information to stakeholders and the public through various external communication media, including through the publication of the Annual Report, the BNI website, mass media, the Electronic Reporting System portal for IDX Issuers, and notification to regulators via hardcopy or electronic reporting media. For BNI, the implementation of the principle of information disclosure is one of the mandates that must be carried out considering the Bank's status as a public company and issuer. However, in its implementation, BNI also pays attention to the principle of company confidentiality and continues to adhere to applicable capital market provisions.

3) Equal Treatment

All Shareholders including Minority Shareholders and Foreign Shareholders are given equal treatment and opportunity to obtain information about the Bank.

BNI protects the rights of Shareholders as referred to in the Capital Market provisions. The rights of stakeholders must be recognized in accordance with applicable laws and regulations, and active cooperation between the Bank and stakeholders must be developed in a joint effort to create wealth, jobs, and sustainability of the Bank.

The Bank provides information accurately and in a timely manner to support the decision-making process of shareholders. As a public company, BNI actively provides information disclosure regarding all material aspects of the Bank, including the Bank's financial situation, performance, corporate actions, ownership and governance. The 2024 Information Disclosure List has been disclosed in the Corporate Secretary's discussion. To support the enforcement of the principle of equality, the Bank also involves the wider community by providing equal opportunities to obtain information and submit criticism/suggestions to the Bank through the BNI website and the BNI Call 1500046 service.

4) Realizing a Positive Bank Image

BNI believes that the implementation of consistent and sustainable GCG practices at all levels of the organization and business aspects contributes positively to increasing the Bank's stock value and can also improve the company's image in the eyes of the public in the long term. The massive development of the digital era over the past few years has encouraged BNI to continue to adapt in implementing GCG practices by utilizing various existing tools to improve the Bank's positive image, for example through print media (newspapers, tabloids, magazines), electronic media (radio and television) and cyber media (websites, Twitter, Instagram, email, news portals, blogs and other social media). BNI optimizes the role of the media to disseminate anti-fraud commitments, WBS, and GCG awareness, including an appeal not to give gifts/presents in any form that can be categorized as gratuities/bribes but not limited to religious holidays.

E. BNI GCG Roadmap

The Board of Commissioners, Directors and all BNI employees continue to strive to improve the quality of GCG implementation and make GCG principles part of the company's culture. The commitment to implementing GCG is further formulated into the Bank's Vision and Mission, Code of Ethics, Integrity Pact, Work Guidelines and Rules, Implementation of Risk Management, Anti-Gratification, Anti-Bribery Management System and implementation of the Social and Environmental Responsibility program. In addition, BNI also realizes the implementation of sustainable GCG through the preparation of the Sustainable Finance Action Plan (RAKB) in business operations by considering aspects of sustainable finance, risk, environment, social, and governance. As a good corporate citizen, BNI also ensures that the implementation of daily banking business operations always complies with applicable regulations in Indonesia and plays an active role in supporting the Sustainable Finance Roadmap designed by the OJK, and the Sustainable Development Goals (SDG) in Indonesia.

General Meeting of Shareholders

The General Meeting of Shareholders (GMS) is the highest organ in the Bank's Governance structure, holding all authority that cannot be delegated to the Board of Commissioners and the Board of Directors, as stipulated in applicable laws and/or the Bank's Articles of Association.The GMS serves as a platform for shareholders to exercise their rights to express opinions, cast votes, and obtain information related to the Bank, as long as it pertains to the meeting agenda and does not conflict with the interests of the company, while also adhering to the company's Articles of Association and applicable regulations. All decisions made in the GMS are based on the Bank's interests and are carried out fairly and transparently.

The implementation of the BNI GMS is carried out with reference to provisions including:

1. Law No. 19 of 2003 concerning State-owned enterprises, as amended by Law No. 6 of 2023 on Stipulating Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
2. Law No. 40 of 2007 concerning Limited Liability Companies as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law;
3. OJK Regulation No. 15/POJK.04/2020 concerning Planning and Implementing General Meeting of Shareholders in Public Companies;
4. OJK Regulation No. 16/POJK.04/2020 concerning Electronic Implementation of the General Meeting of Shareholders in Public Companies;
5. PT Kustodian Sentral Efek Indonesia Board of Directors Decree No. KEP-0016/DIR/KSEI/0420 of 2020 concerning Implementation of the KSEI electronic General Meeting System (eASY.KSEI) Facility as an Electronic Authorization Mechanism in the Process of Organizing a GMS for Securities Issuers who are Public Companies and whose shares are kept in KSEI Collective Custody; and
6. Company's Articles of Association.

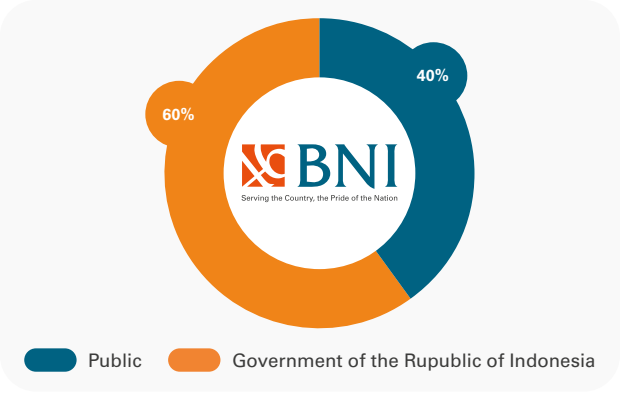
SHAREHOLDERS

The Articles of Association of BNI define "Shareholders" as holders of Series A Dwiwarna shares, Series B shares, and Series C shares, unless explicitly stated otherwise. Therefore, BNI's shares consist of:

1. Series A Dwiwarna shares, which can only be owned by the Republic of Indonesia; and
2. Series B and Series C shares, which are ordinary shares that can be owned by the Republic of Indonesia and the public.

Information on the Ultimate Shareholder and BNI's Beneficial Owner [ACGS C.1.1]

BNI is a state-owned enterprise (SOE) bank, so the party acting as the main shareholder, controller, and beneficial owner of the Bank is the Republic of Indonesia, with a shareholding portion of 60%.



Information on Shareholding of More Than 5% Shares

The ownership of BNI shares that reaches 5% or more of the fully issued and paid-up shares is held by the Republic of Indonesia, which in this case is represented by the Ministry of State-Owned Enterprises, amounting to 60.000% or a total of 22,378,387,750 (twenty-two billion three hundred seventy-eight million three hundred eighty-seven thousand seven hundred fifty) shares.

General Shareholder Rights

The Bank ensures that the rights of shareholders are always protected, with the aim of increasing participation and the role of shareholders or investors in the implementation of the Bank's communication

program as a public company. In general, the rights of BNI shareholders are as follows:

1. Requesting the convening of a GMS.
2. Proposing agenda items for the GMS.
3. Granting a proxy to attend and vote at the GMS.
4. Attending and casting votes in the GMS electronically. [ACGS (B) A.1.1]
5. Having 1 (one) vote for each 1 (one) share.
6. The right to express opinions and vote in the GMS based on one share.
7. Receiving information related to the agenda items and proposed resolutions of the GMS.
8. Receiving an explanation of the voting procedures before the GMS begins.
9. Asking questions on any agenda discussion and on any resolutions made during the GMS.
10. Consulting on issues concerning the fundamental rights of shareholders, as long as it supports the sustainable growth of the Company and enhances its value in the medium to long term, especially for institutional shareholders.
11. Receiving a portion of the Company's profits.
12. Receiving material new information/facts, including those available to financial analysts and other similar parties, within the time frame as stipulated by capital market regulations.
13. Receiving information regarding the privileges attached to the Company's share series.
14. Shareholders who do not agree on Mergers, Amalgamations, Acquisitions, or Separations reserve the right to request the Company to buy their shares at their fair prices. The highest share buyback price shall be the average of the share's daily closing prices on the Stock Exchange for the last 90 (ninety) days before the share buyback date as stipulated in Law No. 40 of 2007 concerning Limited Liability Companies, Regulation of the Financial Services Authority of the Republic of Indonesia Number 41/POJK.03/2019 concerning Mergers, Amalgamations, Acquisitions, Integration, and Conversions of Commercial Banks, and Regulation of the Financial Services Authority of the Republic of Indonesia Number 29 of 2023 concerning Share Buybacks issued by Public Companies.

Privileges Attached to Shares

Holders of Series A Dwiwarna shares, Series B shares, and Series C shares have equal rights, with each share granting 1 (one) vote, unless otherwise specified in the Articles of Association. However, in accordance with the regulations in Indonesia and referring to the provisions of BNI's Articles of Association, the holder of Series A Dwiwarna shares, in this case, the Republic of Indonesia, has privileges that are not held by other shareholders, including: [ACGS A.2.2, A.5.1]

1. The right to agree at the GMS on the following matters:
   a. Approval for amendments to the Articles of Association;
   b. Approval for changes in Capital;
   c. Approval for the appointment and dismissal of members of the Board of Directors and Board of Commissioners; [ACGS A.2.2]
   d. Approval for mergers, consolidations, acquisition, splits and dissolutions;
   e. Approval for remuneration for members of the Board of Directors and Board of Commissioners; [ACGS A.2.1]
   f. Approval for the transfer of assets based on the Articles of Association, requiring the approval of the GMS;
   g. Approval for participation and reduction in the percentage of equity participation in other companies based on the Articles of Association, requiring the approval of the GMS;
   h. Approval for the use of profits;
   i. Approval for non-operational investment and long-term financing based on the Articles of Association, requiring the approval of the GMS;
2. The right to propose Candidates for Members of the Board of Directors and Candidates for Members of the Board of Commissioners;
3. The right to propose GMS agenda;
4. The right to request and access company data and documents in which the mechanism to use such rights is in accordance with the provisions in the Article of Association and regulations.

Except for the above-mentioned privileges, holders of Series B and Series C shares have the same rights, while still observing the provisions of Article 25 of the Company's Articles of Association regarding Quorum, Voting Rights, and Decisions in the GMS. By adhering to the rights of BNI shareholders in accordance with applicable regulations, the Bank ensures that it has never failed or neglected to provide fair and equal treatment to all shareholders, particularly concerning the repurchase of BNI shares.

Fair Treatment of Shareholders

BNI applies the principle of equality and ensures fair treatment for all shareholders. To that end, BNI:

1. Ensures that all shareholders of the same series are treated equally, through:

a. Transparency of shareholders' rights to receive a share of profits through the disclosure of the dividend payout ratio target, as disclosed in this Annual Report in the Management Discussion and Analysis chapter on the Company's Performance, page 373. [ACGS A.1.1]
b. Disclosure of information regarding the rights attached to all series of shares.This is included in the Company's Articles of Association, which are published on the Company's website.
c. In the case of an agenda item in the GMS regarding changes to rights on shares of a certain series, higher quorum requirements for attendance and decisions are applied, and approval must be obtained from shareholders of the negatively impacted series.
d. Disclosure of the ultimate beneficial owners, as disclosed in this Annual Report in the Corporate Governance chapter under the General Meeting of Shareholders section, page 630.
e. Disclosure of the provision that each shareholder has 1 (one) vote, as stated in the Company's Articles of Association, which can be accessed on the Company's website.

2. Ensures that related party transactions are approved and executed after managing potential conflicts of interest and protecting the interests of the Company and its shareholders, as disclosed in this Annual Report in the Management Discussion and Analysis chapter on the Company's Performance, discussing Material Transactions Containing Conflicts of Interest and/or Transactions with Affiliates/Related Parties, page 387.
3. The Company has a policy to prevent insider trading, as disclosed in the 2024 Annual Report

Policy on Shareholder Relations

The Bank consistently implements good governance principles, particularly in upholding transparency. In achieving good transparency, BNI is committed to providing clear, reliable, and timely information to all parties, including minority and foreign shareholders. This information may include the presentation of both financial and non-financial performance of the Bank. In this regard, the Corporate Secretary plays an active role in carrying out the Bank's information disclosure activities to shareholders in accordance with the provisions of Article 5 of OJK Regulation No. 35/POJK.04/2014 concerning the Corporate Secretary of Issuers or Public Companies.

Furthermore, in order to foster intensive, systematic, and planned relationships with Shareholders, BNI also has an internal company policy governed by the Corporate Guidelines No. IN/794/KMP/001 dated December 23, 2014.

Akses Informasi Kepada Pemegang Saham

[ACGS A.4.1]

BNI's commitment to maintaining the quality of transparency and accountability to Shareholders is demonstrated by providing information in a timely, adequate, clear, accurate, and comparable manner, and ensuring that it is easily accessible to stakeholders in accordance with their rights. This enables Shareholders to exercise their rights and responsibilities. The types of information provided by BNI include:

Access to Information for Shareholders

Media	Description
GMS	Media for delivering reports and information to enable shareholders to participate in decision making
Website	BNI : www.bni.co.id IDX : www.idx.co.id (ticker code: BBNI) KSEI : www.ksei.co.id
Print Media	Print media through national and international news/newspapers, magazines, etc. to convey the latest information about the Company.
Electronic Media	Electronic media through national and international news TV, radio, news portals, etc. to convey the latest information about the Company.
Social Media	@bni BNI BNI - Bank Negara Indonesia @bni46 @BNI46

PROVISIONS ON THE CONVENING OF THE GMS AT BNI

Time and Place of GMS Convening

In accordance with the Articles of Association, BNI holds two types of GMS: the Annual GMS and other GMS (Extraordinary GMS). As a state-owned enterprise (SOE) with public company status, BNI is required to hold the Annual GMS no later than 6 (six) months after the end of the fiscal year, or in accordance with the provisions set by the OJK under certain circumstances. In addition, BNI may convene other GMS at any time as needed for the interests of the Bank.

According to OJK regulations, the GMS of BNI, as a public company, must be held within the territory of the Republic of Indonesia and must be conducted in:
1. The domicile of BNI;
2. The place where BNI conducts its main business activities;
3. The capital city of the province where BNI's domicile or main business activities are located; or
4. The province where the stock exchange listing BNI's shares is located.

Procedures for Convening the GMS

Based on (1) OJK Regulation No. 15/POJK.04/2020 concerning the Plan and Organization of General Meetings of Shareholders of Public Companies; (2) OJK Regulation No. 16/POJK.04/2020 concerning the Electronic Implementation of General Meetings of Shareholders of Public Companies; and (3) Article 23 paragraph (5) letter d and Article 23 paragraph (7) letter c of the Bank's Articles of Association, the organization of the Annual GMS and Extraordinary GMS of BNI must comply with the following procedural requirements:
1. Notify OJK of the meeting agenda no later than 5 (five) working days before the announcement of the GMS, excluding the date of the GMS announcement;
2. Announce the GMS to shareholders no later than 14 (fourteen) days before the GMS call, excluding the date of the announcement and the date of the call;
3. Provide shareholders with the opportunity to propose meeting agenda items in writing to the Company. The shareholder(s) proposing the agenda must be 1 (one) shareholder or more, representing 1/20 (one-twentieth) or more of the total shares with voting rights. Agenda proposals must be submitted to the Company no later than 7 (seven) days before the GMS notice date; [ACGS A.2.15]
4. Issue the GMS notice to shareholders no later than 21 (twenty-one) days before the date of the GMS, excluding the date of the notice and the date of the GMS. The notice must include the reasons and/or explanations for each agenda item requiring GMS approval; and [ACGS A.2.13, A.2.14, (B)A.2.1]
5. Disclose detailed profiles of the members of the Board of Directors and the Board of Commissioners, which must at least include information about their age, academic qualifications, first appointment date, experience, and positions in other public companies, in the nomination/re-election process. [ACGS A.6.3]

Furthermore, the announcement and notice of the GMS to shareholders must at least be carried out through: [ACGS (B) A.1]
1. The e-GMS service provider's website;
2. The Stock Exchange website; and
3. BNI's website, in both Indonesian and a foreign language, with the foreign language used at least being English. [ACGS A.6.2]

Throughout 2024, BNI held 1 (one) GMS, and its implementation has met the procedures for Notification, Announcement, and GMS Notice, with the following details:

GMS	Notification to OJK	Announcement		Invitation [ACGS (B) A.1.1, (B) A.2.1]	
		Submission	Through	Submission	Through
Annual GMS	Notification of Annual GMS to OJK through Letter Number CSE/7/0380 dated January 16, 2024	Through BNI Letter No. CSE/7/0575 on January 23, 2024	• Website of IDX; • Website of BNI; and • Situs web KSEI.	Through BNI Letter No. CSE/7/1005 on February 7, 2024	• Website of IDX; • Wesite of BNI; and • Website of KSEI. On the date of the shareholder summons, BNI also provides information on the profile of the Board of Directors and Board of Commissioners who will be appointed or reappointed at the GMS and explains the time and place of implementation and the agenda of the GMS.

The procedure for convening the GMS implemented by BNI as a state-owned bank in Indonesia refers to the provisions of Article 38 paragraph (7) of the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 on the Governance and Human Resources of State-Owned Enterprises, which stipulates that a public SOE must submit the curriculum vitae (CV) of the proposed candidates for members of the Board of Commissioners and/or the Board of Directors to be appointed in the GMS. This information must be available and announced at the time of the GMS before any decision is made regarding the appointment of such candidates as members of the Board of Commissioners and/or the Board of Directors of the Bank.

Information related to the stages of BNI's GMS implementation can be accessed via the website: https://www.bni.co.id/id-id/perseroan/tata-kelola/rups. [ACGS A.6.5]

Agenda Materials for the GMS

BNI provides an opportunity for shareholders or their proxies to submit questions and/or comments. All questions and/or comments submitted are then recorded in the GMS minutes and published on BNI's website. Below is a description of the Agenda Materials for the GMS: [ACGS A.2.5]

1. The Agenda Materials for the GMS are documents containing the agenda items, accompanied by the legal basis and relevant explanations for each agenda item;
2. The Company is required to provide the agenda materials for the meeting to shareholders, which can be accessed and downloaded through the Company's website and/or e-GMS. These agenda materials must be available from the date the GMS notice is issued until the GMS is held;
3. In the case of agenda items involving changes to the Company's management, the curriculum vitae of the proposed candidates for members of the Board of Commissioners and the Board of Directors of the Public SOE, to be appointed in the GMS, must be available and announced at the time of the GMS, before any decision is made regarding their appointment. This is in accordance with the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning the Governance and Human Resources of State-Owned Enterprises; and
4. During the GMS, shareholders are entitled to receive information regarding the meeting agenda and the related materials as long as they do not conflict with the interests of the Company. The GMS held by BNI throughout 2024 has followed all the necessary procedures, including Notification, Announcement, and Notice of the GMS.

GMS Code of Conduct

1. The GMS Code of Conduct is implemented based on OJK Regulation No. 15/POJK.04/2020 concerning the Plan and Organization of General Meetings of Shareholders of Public Companies;
2. The GMS Code of Conduct is distributed to shareholders or their proxies during registration;
3. The Code of Conduct governs, among other things, the participants entitled to attend the GMS, the meeting chairperson, the language used during the GMS, the quorum for the meeting and decision-making, the question-and-answer and response mechanisms, the decision-making process, and the voting procedures;
4. The key points of the GMS Code of Conduct are read out before the GMS begins; [ACGS A.2.4] and
5. In accordance with the provisions of the GMS Code of Conduct as outlined in the Company's Articles of Association, during the opening of the GMS, the meeting chairperson provides an explanation to shareholders regarding:
   a. A brief overview of the Company's general condition;
   b. The agenda items of the GMS;
   c. The decision-making mechanisms related to the agenda items; and
   d. The procedures for shareholders to exercise their rights to submit questions and/or opinions.

Attendance of Shareholders and Other Parties in the GMS

Referring to the provisions of Article 23 paragraph (1) of OJK Regulation No. 15/2020 concerning the Plan and Organization of General Meetings of Shareholders of Public Companies, shareholders, either in person or represented by proxy, have the right to attend the GMS. Shareholders entitled to attend the GMS are those whose names are listed in the shareholder registry of the public company 1 (one) business day before the notice of the GMS.

Granting of Power of Attorney, Electronic Power of Attorney, and Opportunity to Submit Questions and/or Responses

In accordance with OJK Regulation No. 15/2020, shareholders, whether in person or represented by a proxy, have the right to attend the GMS. During the voting process in the GMS, the voting rights exercised by the shareholder apply to all the shares they own, and shareholders are not allowed to grant a power of attorney to more than one proxy for a portion of their shares with different votes. If a shareholder is unable to attend physically, they can still participate in the GMS electronically via eASY.KSEI. The electronic voting method, both for the Annual GMS and the Extraordinary GMS, is conducted securely and in real-time on an in-absentia basis. [ACGS (B).A.1.1]

In the implementation of the General Meeting of Shareholders (GMS), shareholders have the right to ask questions and/or provide responses, subject to the following provisions: [ACGS A.2.5]

1. Only shareholders or their proxies who have registered for the GMS are entitled to ask questions and/or provide responses during the meeting;
2. The question and/or response forms will be provided to the shareholders or their proxies during the GMS registration;

3. After the Chairperson of the GMS or the person designated by the Chairperson of the GMS presents proposals regarding matters to be decided at the GMS, the Chairperson of the GMS will give shareholders or their proxies the opportunity to ask questions and/or provide responses before a vote is held on the matter in question; and
4. For Shareholders or their proxies who wish to ask questions and/or provide responses, the Chairperson of the GMS invites shareholders/proxies to submit their questions and/or responses in writing, stating their name and the number of shares owned or represented. The questions and/or responses must directly relate to the agenda item being discussed at the GMS.

The bank provides equal opportunity for all shareholders or their proxies to ask questions and/or provide responses during the GMS. The questions and/or responses submitted are recorded in the Minutes of the GMS and published on the BNI website. [ACGS A.2.5]

Bank's Efforts to Increase Shareholder Attendance at the General Meeting of Shareholders (GMS) [ACGS A.4.1]

The Bank continuously facilitates shareholders in exercising their rights and authority to make decisions in the GMS forum. To achieve this, BNI has implemented a series of efforts, including:

1. The Bank provides an electronic proxy alternative for shareholders to attend and vote in the GMS. The electronic proxy is carried out through the e-RUPS system provided by KSEI. Shareholders can specify their voting preferences for each agenda item in the electronic proxy.
2. The Bank issues timely Announcements and Notices of the GMS in both Indonesian and English, which are published on the e-RUPS provider's website, the company's website, and the Indonesia Stock Exchange (IDX) website;
3. In the Announcement and Notice of the GMS, the Bank clearly outlines which shareholders are authorized to attend/represent and vote in the GMS, namely shareholders whose names are listed in the Company's Shareholder Register or shareholders with securities accounts at PT Kustodian Sentral Efek Indonesia on the date of the notice;
4. On the website, the Bank provides contact details that shareholders can use to communicate regarding the GMS; and
5. The Company provides services to shareholders who need information and/or wish to ask questions related to the GMS plan and/or the agenda items of the GMS, either through direct meetings or correspondence via e-mail.

Quorum Requirements for Attendance and Decisions at the General Meeting of Shareholders (GMS)

A. Quorum for Attendance [ACGS E.3.4]

The GMS may be held if attended by shareholders representing more than 1/2 (one-half) of the total number of shares with valid voting rights, unless otherwise specified by Law and/or the Articles of Association. As outlined in BNI's Articles of Association, the GMS to make changes to the composition of the Board of Directors and the Board of Commissioners must be attended by the Series A Dwiwarna shareholders and other shareholders and/or their valid representatives, together representing at least 1/2 (one-half) of the total number of shares with valid voting rights. Meanwhile, the GMS held to amend the Articles of Association must be attended by the Series A Dwiwarna shareholders and other shareholders and/or their valid representatives, together representing at least 2/3 (two-thirds) of the total number of shares with valid voting rights.

B. Decisions of the General Meeting of Shareholders (GMS)

Decisions in the GMS are made based on deliberation to reach a consensus. In practice, each resolution taken in the GMS addresses only one issue and no multiple issues are combined into a single resolution. If a consensus is not reached through deliberation, the decision is made by a vote. Decision-making by vote must be conducted with regard to the quorum requirements for both attendance and decision-making at the GMS. The quorum for decision-making at the GMS requires that the decision must be approved by more than 1/2 (one-half) of the total shares present with valid voting rights. [ACGS A.6.1, E.3.4]

The GMS to amend the Articles of Association of the Bank must receive approval from the Series A Dwiwarna shareholders and other shareholders and/or their valid representatives, who together represent more than 2/3 (two-thirds) of the total shares with valid voting rights present at the meeting. Similarly, the GMS held to approve changes to the composition of the Board of Directors and the Board of Commissioners

must be approved by the Series A Dwiwarna shareholders and other shareholders and/or their valid representatives, who together represent more than 1/2 (one-half) of the total shares with valid voting rights present at the meeting. [ACGS E.3.4]

In accordance with POJK No. 15/POJK.04/2020 of 2020 regarding the Plan and Implementation of General Meetings of Shareholders of Public Companies and POJK No. 16/POJK.04/2020 of 2020 regarding the Electronic Implementation of General Meetings of Shareholders of Public Companies, the GMS held by BNI in 2024 has followed all the necessary procedures, including Notifications, Announcements, and Invitations to the GMS, and the decisions of the GMS will be announced to the public on the next business day.

Implementation of the One-Share-One-Vote Principle

BNI adopts the One Share One Vote principle in the decision-making process and voting during the 2024 Annual General Meeting of Shareholders (AGMS), which will be held on March 4, 2024. As permitted in the Annual GMS Rules of Procedure, the Bank allows for in-absentia voting in the 2024 Annual GMS and prioritizes decision-making through a voting method using ballots (rather than a show of hands) for all resolutions passed during the 2024 Annual GMS. All provisions regarding the voting mechanism in the GMS have been published on the Company's website 21 days prior to the GMS. In compliance with POJK 15/2020, the Rules of Procedure for the GMS are also distributed to shareholders attending the meeting, and the key points of the Rules of Procedure are read out before the GMS begins. [ACGS A.2.9, A.2.10]

Parties That Validate the Voting Results [ACGS A.2.11]

BNI appoints independent and professional parties to ensure the fairness and validity of the implementation and decision-making process of the GMS. The independent parties referred to include:

1. Notary
   A Notary is a public official authorized to prepare an authentic deed with other authorities as referred to in Notorial Law, and who is registered with OJK as a capital market supporting profession. The Notary's role is to examine the validity of supporting documents, and the formality requirements for the GMS, to ensure they do not conflict with the laws and regulations and articles of association.
2. Share Register Bureau
   The Share Register Bureau is a party contracted with the company/issuer to record the securities ownership and distribution of rights related to securities. The Share Register Bureau assists the company/issuer in concerning the GMS, by:
   a. Preparing proxies from minority shareholders;
   b. Publishing Written Confirmation for Meetings (KTUR);
   c. Validating shareholders who are entitled to attend the GMS and registering them;
   d. Calculating shareholders presence in connection with the GMS quorum;
   e. Providing voting cards for shareholders;
   f. Helping the Notary in calculating votes using a barcode scanner.

Implementation of the 2024 Annual General Meeting of Shareholders (AGMS)

Throughout 2024, BNI has held 1 (one) GMS, which is the Annual General Meeting of Shareholders (AGMS) for the 2023 Financial Year, held on March 4, 2024. This AGMS was conducted electronically (e-RUPS) through the eASY.KSEI system, with the physical meeting taking place at the Menara BNI Building. All participants, whether attending electronically or physically, were able to follow and actively participate. The results of the 2024 AGMS decisions were reported to the OJK and announced on the Bank's website (https://www.bni.co.id/id-id/perseroan/tata-kelola/rups), the IDX website (www.idx.co.id), and the KSEI website (www.ksei.co.id). [ACGS (B) A.1.1]

Overall, the administrative procedures for reporting the implementation of the 2024 AGMS at BNI, from the notification stage, announcement, to the calling of shareholders, have complied with the provisions of POJK 15/2020 and were communicated through the eASY.KSEI system and published on the Bank's website within the required timeframe.

Day, Date and Time	Monday, March 4, 2024; 14.19 – 16.00 WIB
Venue	Ballroom Menara BNI 6th Floor, Jalan Pejompongan Raya No. 7, Bendungan Hilir, Jakarta
Quorum	Shareholders and/or their proxies present, whether in the meeting room or electronically, collectively hold 32,484,226,683 shares, including Series A Dwiwarna shares, which represents 87.1900650% of the total number of shares with valid voting rights issued by the Bank as of the meeting date, which amounts to 37,256,798,316 shares, excluding treasury shares totaling 40,514,600 shares. These shares consist of: • 1 (one) Series A Dwiwarna share; • 578,683,733 Series B shares; and • 36,718,629,182 Series C shares. Taking into account the Company's Shareholder Register as of February 6, 2024, up to 4:00 PM WIB, the quorum required under Article 41 paragraph (1) letter a and Article 42 letter a of Financial Services Authority Regulation No. 15/POJK.04/2020 concerning the Plan and Implementation of General Meetings of Shareholders of Public Companies ("POJK 15") in conjunction with Article 25 paragraph (1) letter a, paragraph (4) letter a, and paragraph (5) letter a of the Company's Articles of Association has been met. Therefore, the meeting is valid and authorized to make valid and binding decisions on the matters discussed in accordance with the meeting agenda.
Chairman of the AGMS	The meeting was led by Pradjoto as the President Commissioner/Independent Commissioner, in accordance with the letter from the Board of Commissioners No. DK/22 dated February 22, 2024.
Attendance of member of the Board of Commissioners including the President Commissioner [ACGS A.2.7, A.2.8]	All members of the Board of Commissioners attended the 2023 Financial Year Annual General Meeting of Shareholders, with the following attendance details: - President Commissioner/Independent: Pradjoto - Vice President Commissioner: Pahala Nugraha Mansury - Independent Commissioner: Sigit Widyawan - Commissioner: Askolani - Independent Commissioner: Asmawi Syam - Commissioner: Susyanto - Independent Commissioner: Iman Sugema - Independent Commissioner: Septian Hario Seto - Independent Commissioner: Erwin Rijanto Slamet - Commissioner: Fadlansyah Lubis - Commissioner: Robertus Billitea
Attendance of member of the Board of Directors, including the President Director [ACGS A.2.7, A.2.8]	All members of the Board of Directors attended the 2023 Financial Year Annual General Meeting of Shareholders, with the following attendance details: - President Director: Royke Tumilaar - Deputy President Director: Adi Sulistyowati - Finance Director: Novita Widya Anggraini - Digital and Integrated Transaction Banking Director: Corina Leyla Karnalies - Enterprise and Consumer Banking Director: Sis Apik Wijayanto - Risk Management Director: David Pirzada - Wholesale and International Banking Director: Silvano Winston Rumantir - Network and Services Director: Ronny Venir - Institutional Banking Director: Muhammad Iqbal - Retail Banking Director: Putrama Wahju Setyawan - Human Capital and Compliance Director: Mucharom - Technology and Operations Director: Toto Prasetio
Independent vote counters [ACGS A.2.11]	The vote counting for the decision-making basis of the meeting was conducted by PT Datindo Entrycom as the Securities Administration Bureau. Subsequently, the votes were validated by Ashoya Ratam, S.H., M.Kn, a Notary in Jakarta.
Attendance of member of the Audit Committee, including the Chairman of Audit Committee	All members of the Audit Committee, including the Chairman of the Audit Committee, attended the 2023 Financial Year Annual General Meeting of Shareholders, with the following attendance details: - Chairman: Asmawi Syam - Independent Commissioner - Member: Sigit Widyawan - Independent Commissioner - Member: Iman Sugema - Independent Commissioner - Member: Suhendi Muharam - Independent Party - Member: Human Brilianto - Independent Party
Attendance of the Chairman of the Nomination and Remuneration Committee	The Chairman of the Nomination and Remuneration Committee, Pradjoto - President Commissioner/Independent Commissioner of BNI, attended the 2023 Financial Year Annual General Meeting of Shareholders.
Number of shareholders who raised questions and/or opinions	All shareholders are given the opportunity to ask questions and/or provide opinions on each agenda item of the AGMS. During the discussion of the first agenda item, shareholders and their proxies/representatives raised questions and/or expressed opinions at the AGMS.

Procedures and Implementation Process of the 2024 AGMS

As a public company, all stages of the implementation of the 2024 BNI Annual General Meeting of Shareholders (AGMS) have been carried out in accordance with the provisions of POJK 15/2020, with the following details:

Stages of the 2024 Annual General Meeting of Shareholders for the 2023 Financial Year

Description	Date	Notes
Annual GMS Notification to Regulator (OJK)	January 16, 2024	It was submitted to the OJK through the Company's Letter No. CSE/7/0380 dated January 16, 2024, regarding the Notification of the 2023 Financial Year Annual General Meeting of Shareholders and the Provisional Meeting Agenda of PT Bank Negara Indonesia (Persero) Tbk.
Announcement of the Annual GMS to Shareholders	January 23, 2024	BNI has submitted the Announcement of the 2023 Financial Year Annual General Meeting of Shareholders to the OJK through Letter No. CSE/7/0575 dated January 23, 2024. The Notice of the Annual General Meeting has also been communicated through: Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; Indonesian Stock Exchange website: www.idx.co.id; BNI's website: www.bni.co.id.
Proposed Agenda for the Annual GMS by Shareholders	January 31, 2024	In accordance with the provisions of Article 16 paragraph (2) of POJK, shareholders, either individually or collectively, representing 1/20 (one-twentieth) or more of the total shares of the Company, are entitled to submit proposals related to the Meeting Agenda, including adding items to the agenda. Such proposals must be submitted in writing to the Board of Directors of the Company, as the organizer of the GMS, no later than 7 (seven) days before the Meeting Notice date, which is Wednesday, January 31, 2024, at 4:00 PM WIB. BNI's shareholder, in this case, the Ministry of State-Owned Enterprises (Kementerian BUMN), has submitted the Approval for the 2023 Financial Year Annual General Meeting of Shareholders through Letter No. SR-
Recording Date for List of Shareholders Entitled to Attend the Annual GMS	February 6, 2024	Shareholders who are entitled to attend/represent and vote in the meeting are BNI shareholders whose names are registered in the BNI Shareholder Register or shareholders in securities accounts at PT Kustodian Sentral Efek Indonesia (KSEI) as of Tuesday, February 6, 2024, until 4:00 PM WIB.
Invitation and Information on the Annual GMS Agenda [ACGS A.2.13, (B) A.1]	February 7, 2024	BNI has submitted the Notice of the 2023 Financial Year Annual General Meeting of Shareholders to the OJK through Letter No. CSE/7/1005 dated February 7, 2024. The Notice of the Annual General Meeting has also been communicated through: Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; Indonesian Stock Exchange website: www.idx.co.id; BNI's website: www.bni.co.id.
Implementation of the Annual GMS	March 4, 2024	The meeting was held both physically and electronically in accordance with POJK No. 16/POJK.04/2020 regarding the Electronic Implementation of General Meetings of Shareholders of Public Companies, with PT Kustodian Sentral Efek Indonesia as the e-RUPS provider through the eASY.KSEI application. The physical meeting was held at the Ballroom of Menara BNI, 6th Floor, Jalan Pejompongan Raya No. 7, Bendungan Hilir, Jakarta.
Annual GMS Minutes Summary	March 4, 2024	The results of the 2024 Annual General Meeting of Shareholders have been formalized through the Deed of the Minutes of the Annual General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 03 dated March 4, 2024.
Publication of the Annual GMS Minutes Summary [ACGS A.2.12]	March 5, 2024	BNI has submitted the Publication of the Summary of the Minutes of the 2023 Financial Year Annual General Meeting of Shareholders to the OJK through Letter No. CSE/7/1615 dated March 5, 2024. The Publication of the Summary of the Minutes of the Annual General Meeting has also been communicated through: Indonesian Central Securities Deposito ry ("KSEI") website: www.ksei.co.id; Indonesian Stock Exchange websit: www.idx.co.id; BNI's website: www.bni.co.id.
Submission of the Deed of the Annual GMS Minutes to Regulators	April 2, 2024	BNI has submitted the Deed of the Minutes of the 2023 Financial Year Annual General Meeting of Shareholders No. 03 dated March 4, 2024, made before Ashoya Ratam, S.H., M.Kn, a Notary in Jakarta, through the Company's Letter No. CSE/7/2270 dated April 2, 2024.

Decision-Making Mechanism for the 2024 AGMS [ACGS E.3.4]

Referring to the quorum provisions set forth in POJK 15/2020 and the Bank's Articles of Association, decisions in the meeting are made based on deliberation to reach a consensus. If a consensus is not reached, the decision will be made through a voting method. The voting mechanism for decision-making in the meeting is as follows:

1. For the first and fourth agenda items, the decision is valid if approved by more than ½ (one-half) of the total shares with voting rights present at the meeting;
2. For the second, third, and sixth agenda items, the decision is valid if approved by the Series A Dwiwarna shareholders and other shareholders and/or their valid proxies, collectively representing more than ½ (one-half) of the total shares with voting rights present at the meeting;
3. For the fifth agenda item, the decision is valid if approved by the Series A Dwiwarna shareholders and other shareholders and/or their valid proxies, collectively representing more than 2/3 (two-thirds) of the total shares with voting rights present at the meeting.

Minutes of the 2024 AGMS Decision on March 4, 2024

The decisions of the 2024 AGMS for the 2023 financial year have been recorded in Deed No. 03 dated March 4, 2024, made by and before Ashoya Ratam, S.H., M.Kn., Notary in South Jakarta Administrative City (Notary). The details of the decisions made in the AGMS on March 4, 2024, are as follows:

Agenda I	Approval of the Annual Report and Ratification of the Consolidated Financial Statements of the Company, Approval of the Supervisory Task Report of the Board of Commissioners, as well as the Ratification of the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2023 Financial Year, along with the full acquittal and discharge of responsibility (volledig acquit et de charge) to the Board of Directors for the management of the Company and the Board of Commissioners for the supervision of the Company carried out during the 2023 Financial Year.		
Number of Shareholders' Inquiries [ACGS A.2.5]	1 (one) person submitted feedback from the Shareholder or their authorized representatives		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,439,520,837 shares, or 99.8623768% of the total shares with valid voting rights present at the meeting.	44,705,846 shares, or 0.1376232% of the total shares with valid voting rights present at the meeting.	199,977,614 shares, or 0.6156145% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions [ACGS A.6.1]	1. Approved the Company's Annual Report including Report of the Board of Commissioners' Supervisory Duties for the Fiscal Year 2023 ended on December 31, 2023. 2. Ratified: a. The Company's Consolidated Financial Statements for the 2023 Financial Year, which ended on December 31, 2023, audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partner (a member firm of the PricewaterhouseCoopers Global network), in accordance with Report No. 00019/2.1025/AU.1/07/0222-2/1/I/2024 dated January 25, 2024 with a fair opinion in all material respects, and b. The Financial Report of the Micro and Small Business Funding Program (PUMK) for the fiscal Year 2023 which ended on December 31,2023, audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partner (a member firm of PricewaterhouseCoopers Global Network) in accordance with Report No. 00043/2.1025/AU.2/07/0222-3/1/II/2024 dated February 12, 2024 with a fair opinion in all material respects. 3. With the approval of the Company's Annual Report, including the Supervisory Task Report of the Board of Commissioners, and the ratification of the Company's Consolidated Financial Statements, as well as the Financial Statements of the Micro and Small Business Funding Program (PUMK), all for the 2023 Financial Year ending on December 31, 2023, the AGMS grants full acquittal and discharge of responsibility (volledig acquit et de charge) to all members of the Board of Directors for the management of the Company and the members of the Board of Commissioners for the supervision of the Company conducted during the 2023 Financial Year ending on December 31, 2023, provided that such actions are not criminal in nature and are reflected in the above-mentioned reports.		
Follow-up on the Meeting's Decision	The decisions were immediately effective		
Realization	Already realized		

Agenda II	Approval of the Use of the Company's Net Profit for the Fiscal Year 2023.		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,484,223,083 shares, or 99.9999889% of the total shares with valid voting rights present at the meeting.	3,600 shares, or 0.0000111% of the total shares with valid voting rights present at the meeting.	173,176,232 shares, or 0.5331087% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions [ACGS A.6.1]	Approved and determined the use of the Company's consolidated net profit attributable to the parent entity for the 2023 financial year amounting to Rp20,909,476,149,342,- (twenty trillion nine hundred nine billion four hundred seventy-six million one hundred forty-nine thousand three hundred forty-two Rupiah) as follows: 1. Fifty percent (50%) or a total of Rp10,454,738,074,671,- (ten trillion four hundred fifty-four billion seven hundred thirty-eight million seventy-four thousand six hundred seventy-one Rupiah) or Rp280.49516984960 (two hundred eighty point four nine five one six nine eight four nine six zero Rupiah) per share is designated as a Cash Dividend. The payment will be carried out under the following terms: a. The dividend portion for the State of the Republic of Indonesia amounting to Rp6,277,029,672,896.46 (six trillion two hundred seventy-seven billion twenty-nine million six hundred seventy-two thousand eight hundred ninety-six point four six Rupiah) will be deposited in the State Treasury account. b. The dividend for the 2023 financial year will be paid proportionally to each shareholder whose name is listed in the Shareholder Register on the Recording Date. c. The Board of Directors is granted the authority and power, with the right of substitution, to carry out the following: I. Establish the schedule and procedures for the distribution related to the payment of the dividend for the 2023 financial year in accordance with applicable regulations. II. Deduct dividend taxes in accordance with the prevailing tax regulations. III. Address other technical matters in accordance with applicable regulations. 2. Fifty percent (50%) or a total of Rp10,454,738,074,671,- (ten trillion four hundred fifty-four billion seven hundred thirty-eight million seventy-four thousand six hundred seventy-one Rupiah) will be used as Retained Earnings.		
Follow-up on the Meeting's Decision [ACGS A.1.1]	BNI has distributed the Cash Dividend to Shareholders on April 2, 2024.		
Realization	Already realized.		

Agenda III [ACGS A.2.1]	Determination of Remuneration (Salary/Honorarium, Facilities and Allowances) for 2024 and Tantiem for Fiscal Year 2023 for the Company's Board of Directors and Board of Commissioners		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6, D.3.12]	**Agree**	**Disagree**	**Abstain**
	30,916,510,975 shares, or 95.1739171% of the total shares with valid voting rights present at the meeting.	1,567,715,708 shares, or 4.8260829% of the total shares with valid voting rights present at the meeting.at	173,963,032 shares, or 0.5355308% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions[*)] [ACGS A.2.1, A.6.1, D.3.12]	1. Granted authority and power of attorney to Series A Dwiwarna Shareholders to determine the following items for members of the Board of Commissioners: a. Tantiem/Performance Bonus/Special Incentive for the Fiscal Year 2023 and/or Long Term Incentive for the Fiscal Year Period of 2024-2026, in accordance with the applicable provisions b. Honorarium, Benefits, and Facilities for Fiscal Year 2024. 2. Granted authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders, to determine the following items for members of the Board of Directors: a. Tantiem/Performance Bonus/Special Incentive for the Fiscal Year 2023 and/or Long Term Incentive for the Fiscal Year Period of 2024-2026, in accordance with the applicable provisions; and b. Honorarium, Benefits, and Facilities for Fiscal Year 2024.		
Follow-up on the Meeting's Decision	The decision is being implemented. The Series A Dwiwarna Shareholders have determined the Compensation for the Board of Directors and the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk for the year 2024 through Letter No. SR-200/MBU/04/2024 dated April 3, 2024		
Realization	In the implementation process.		

*) The decision-making regarding the approval of remuneration or salary increases for the Board of Directors and/or the Board of Commissioners is made by the Series A Dwiwarna shareholders. This is in accordance with the special rights held by the Series A Dwiwarna shareholders as stipulated in the Articles of Association of BNI.

Agenda IV	Appointment of a Public Accountant and/or Public Accounting Firm to Audit the Company's Consolidated Financial Statements and Financial Report for the Micro and Small Business Funding Program (PUMK) for the Fiscal Year 2024.
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or responses

Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,477,309,737 shares, or 99.9787068% of the total shares with valid voting rights present at the meeting.	6,916,946 shares, or 0.0212932% of the total shares with valid voting rights present at the meeting.	173,176,032 shares, or 0.5331081% of the total shares with valid voting rights present at the meeting.

Meeting Resolutions [ACGS A.6.1, A.6.4]	1. Approved the appointment of Tanudiredja, Wibisana, Rintis & Partner (a member firm of the PricewaterhouseCoopers Global network) as the Public Accounting Firm to audit the Company's Consolidated Financial Statements, the Financial Statements of the Micro and Small Business Funding Program, and other reports for the Fiscal Year 2024. 2. Approved the granting of authority and power to the Board of Commissioners of the Company to carry out: a. The appointment of a Public Accountant and/or Public Accounting Firm to audit the Company's Consolidated Financial Statements for other periods in the Fiscal Year 2024, for the purposes and interests of the Company; and b. The determination of the audit fee and other terms for the Public Accountant and/or Public Accounting Firm, and the appointment of a Replacement Public Accountant and/or Public Accounting Firm in the event that Tanudiredja, Wibisana, Rintis & Partner (a member firm of the PricewaterhouseCoopers Global network) for any reason, is unable to complete the audit of the Company's Consolidated Financial Statements for the Fiscal Year 2024 and/or other periods in the Fiscal Year 2024, as well as the Financial Statements of the Micro and Small Business Funding Program for the Fiscal Year 2024, including determining the audit fee and other terms for the Replacement Public Accountant and/or Public Accounting Firm.
Follow-up on the Meeting's Decision	The resolutions are being implemented
Realization	In the process of implementation

Agenda V	Changes in the Company's Articles of Association
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or responses

Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	25,446,295,643 shares, or 78.3343125% of the total shares with valid voting rights present at the meeting.	7,037,931,040 shares, or 21.6656875% of the total shares with valid voting rights present at the meeting.	188,399,071 shares, or 0.5799709% of the total shares with valid voting rights present at the meeting.

Meeting Resolutions [ACGS A.6.1]	1. Approved the amendment to the Company's Articles of Association, among other things, to align with the laws and regulations: (a) Law Number 4 of 2023 dated January 12, 2023, concerning the Development and Strengthening of the Financial Sector; (b) OJK Regulation Number 17 of 2023 dated September 14, 2023, on the Implementation of Governance for Commercial Banks; (c) Ministry of BUMN Regulation Number PER-2/MBU/03/2023 dated March 24, 2023, on the Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises; (d) Ministry of BUMN Regulation Number PER-3/MBU/03/2023 dated March 24, 2023, on the Organs and Human Resources of State-Owned Enterprises; and (e) other related regulations. 2. Approved the restructuring of all provisions in the Company's Articles of Association in connection with the changes as referred to in item 1 above. 3. Granted authority and power to the Board of Directors with substitution rights to take all necessary actions related to the Meeting's decision, including but not limited to drafting and restating the entire Articles of Association of the Company in a Notarial Deed, adjusting the amendments to the Articles of Association of the Company if required by the relevant authorities, and submitting them to the relevant authorities to obtain approval and acknowledgment of the notification of the amendments to the Articles of Association of the Company, and do everything deemed necessary and useful for that purpose with nothing being excluded.
Follow-up on the Meeting's Decision	The decision has been effective, and the latest Articles of Association of the Company in Deed No. 5 dated March 4, 2024, has been published on the BNI website
Realization	Realized

Agenda VI [ACGS A.2.3]	Changes in the Company's Management Composition		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	25,016,488,811 shares, or 77.0111878% of the total shares with valid voting rights present at the meeting.	7,467,737,872 shares, or 22.9888122% of the total shares with valid voting rights present at the meeting.	422,479,549 shares, or 1.3005683% of the total shares with valid voting rights present at the meeting.

Meeting Resolutions*) [ACGS A.2.3, A.6.1]

1. Respectfully dismissed the individuals listed below from their positions as the Management of the Company:
   a. Ms. ADI SULISTYOWATI as Deputy President Director;
   b. Mr. SIS APIK WIJAYANTO as Enterprise and Commercial Banking Director;
   c. Mr. MUHAMMAD Iqbal as Institutional Banking Director;
   d. Mr. SILVANO WINSTON RUMANTIR as Wholesale and International Banking Director;
   e. Mr. SUSYANTO as Commissioner;
   f. Mr. ASKOLANI as Commissioner;

   who were each appointed based on the resolutions of the Annual GMS for the Fiscal Year 2019 dated February 20, 2020, in conjunction with the Extraordinary GMS in 2020 dated September 2, 2020; the Annual GMS for the Fiscal Year 2019 dated February 20, 2020, in conjunction with the Extraordinary GMS in 2022 dated August 31, 2022, in conjunction with the Annual GMS for the Fiscal Year 2022 dated March 15, 2023; the Extraordinary GMS in 2020 dated September 2, 2020, in conjunction with the Extraordinary GMS in 2022 dated August 31, 2022, in conjunction with the Annual GMS for the Fiscal Year 2022 dated March 15, 2023; the Extraordinary GMS in 2020 dated September 2, 2020, in conjunction with the Extraordinary GMS in 2022 dated August 31, 2022, in conjunction with the Annual GMS for the Fiscal Year 2022 dated March 15, 2023; the Annual GMS for the Fiscal Year 2019 dated February 20, 2020; and the Extraordinary GMS in 2019 dated August 30, 2019, with thanks for their contributions of time and ideas during their tenure as the Management of the Company.

2. Transfered the assignment of the individuals listed below as members of the Board of Directors of the Company as follows:
   a. PUTRAMA W. SETYAWAN from Retail Banking Director to Deputy President Director;
   b. CORINA LEYLA KARNALIES from Digital and Integrated Transaction Banking Director to Retail Banking Director;

   who were each appointed based on the resolutions of the Extraordinary GMS in 2022 dated August 31, 2022, in conjunction with the Annual GMS for the Fiscal Year 2022 dated March 15, 2023, and the Annual GMS for the Fiscal Year 2019 dated February 20, 2020, in conjunction with the Extraordinary GMS in 2022 dated August 31, 2022, in conjunction with the Annual GMS for the Fiscal Year 2022 dated March 15, 2023, with their term of office continuing for the remainder of their respective terms, in accordance with the resolution of the GMS appointing them.

3. Appointed the following names to the Company's Management:
   a. Mr. HUSSEIN PAOLO KARTADJOEMENA as Digital and Integrated Transaction Banking Director;
   b. Mr. I MADE SUKAJAYA as Enterprise and Commercial Banking Director;
   c. Mr. MUNADI HERLAMBANG as Institutional Banking Director;
   d. Mr. AGUNG PRABOWO as Wholesale and International Banking Director;
   e. Mr. ASKOLANI as Commissioner;
   f. Mr. MOHAMAD YUSUF PERMANA as Commissioner.

4. The term of office of the members of the Board of Directors and the Board of Commissioners appointed as referred to in item 3, in accordance with the provisions of the Company's Articles of Association, taking into account the laws and regulations in the Capital Market sector, and without prejudice to the rights of the GMS to dismiss them at any time.
5. With the dismissal, changes in job titles, transfer of duties, and the appointment of the members of the Board of Directors and the Board of Commissioners of the Company as referred to in items 1, 2, and 3, the composition of the members of the Board of Directors and the Board of Commissioners of the Company is as follows:

a. Board of Directors:
   President Director: Royke Tumilaar
   Deputy President Director: Putrama W. Setyawan
   Digital and Integrated Transaction Banking Director: Hussein Paolo Kartadjoemena
   Enterprise and Commercial Banking Director: I Made Sukajaya
   Finance Director: Novita Widya Anggraini
   Risk Management Director: David Pirzada
   Institutional Banking Director: Munadi Herlambang
   Network and Services Director: Ronny Venir
   Retail Banking Director: Corina Leyla Karnalies
   Technology and Operations Director: Toto Prasetio
   Human Capital and Compliance Director: Mucharom
   Wholesale and International Banking Director: Agung Prabowo

	b Board of Commissioners: President Commissioner/Independent Commissioner: Pradjoto Vice President Commissioner: Pahala Nugraha Mansury Commissioner: Askolani Commissioner: Fadlansyah Lubis Commissioner: Robertus Billitea Commissioner: Mohamad Yusuf Permana Independent Commissioner: Erwin Rijanto Independent Commissioner: Sigit Widyawan Independent Commissioner: Septian Hario Seto Independent Commissioner: Iman Sugema Independent Commissioner: Asmawi Syam 6. Members of the Board of Directors and the Board of Commissioners appointed as referred to in item 3, paragraphs 1), 2), 3), 4), and 6), as well as members of the Board of Directors reassigned as referred to in item 2, paragraph 1), may only carry out their duties after obtaining approval from the Financial Services Authority (OJK) on the Capability and Suitability Assessment (Fit & Proper Test) and complying with the applicable laws and regulations. In the event that the aforementioned members of the Board of Directors and the Board of Commissioners are subsequently not approved as members of the Board of Directors and the Board of Commissioners in the Capability and Suitability Assessment (Fit & Proper Test) by the OJK, they will be respectfully dismissed as of the date the decision on the results of the OJK's Capability and Suitability Assessment (Fit & Proper Test) is issued. 7. Requested the Board of Directors to submit a written request to the Financial Services Authority (OJK) for the implementation of the Capability and Suitability Assessment (Fit & Proper Test) for the members of the Board of Directors and the Board of Commissioners appointed as referred to in item 3, paragraphs 1), 2), 3), 4), and 6), as well as the members of the Board of Directors reassigned as referred to in item 2, paragraph 1). 8. Members of the Board of Directors and the Board of Commissioners appointed as referred to in item 3 who are still holding other positions that are prohibited by laws and regulations from being held concurrently with the position of member of the Board of Directors and the Board of Commissioners of a State-Owned Enterprise, must resign or be dismissed from that position. 9. Granted authority with substitution rights to the Board of Directors of the Company to state the decisions made in this GMS in the form of a Notarial Deed, and to appear before a Notary or authorized official to make any necessary adjustments or corrections as required by the relevant authorities for the implementation of the meeting's resolutions.
Follow-up on the Meeting's Decision	The decision has been effective. The appointed Board of Directors and Board of Commissioners are currently in the process of the OJK's Fit & Proper Test.
Realization	Realized

*) The decision regarding the approval of changes to the Bank's management is made by the Series A Dwiwarna shareholders. This is in accordance with the scope of the special rights held by the Series A Dwiwarna shareholders as stipulated in the Articles of Association of BNI.

Realization of Dividends Payment [ACGS A.1.1]

In accordance with the decision of Agenda Item II of the Annual GMS on March 4, 2024, regarding the Approval of the Use of Net Profit for the Fiscal Year 2023, BNI has made a Cash Dividend payment for the performance of the Fiscal Year 2023 with the following details:

Cash Dividend Distributed (Rp-billion)	IDR10,454,738,074,671
Dividend per Share (Rp)	IDR280.49516984960
Dividend Distribution Ratio from Net Profit for the Year Attributable to Owners of the Parent Entity for the Fiscal Year 2023 (%)	50%
Announcement Date	March 5, 2024
Payment Date	April 2, 2024

INFORMATION ON THE DECISION TO HOLD THE 2023 AGMS FOR THE FISCAL YEAR 2022

Throughout the fiscal year 2023, BNI held 2 (two) GMS meetings, namely the Annual GMS for the Fiscal Year 2022, held on March 15, 2023, and the Extraordinary GMS, held on September 19, 2023. All decisions from both of these GMS meetings were implemented in 2023, so there are no decisions from the GMS for the Fiscal Year 2022 that need to be followed up in 2024. Below is the information on the results of the Annual GMS for the Fiscal Year 2022, dated March 15, 2023, and their follow-up actions:

Minutes of March 15, 2023 AGMS Resolutions

The decision of the 2023 Annual GMS for the Fiscal Year 2022 has been documented in Deed No. 15 dated March 15, 2023, made by and before Ashoya Ratam, S.H., M.Kn., Notary in South Jakarta Administrative City (Notary). The details of the decisions from the Annual GMS dated March 15, 2023, are as follows:

Agenda I	Approval of the Annual Report and Ratification of the Company's Consolidated Financial Report, Approval of the Board of Commissioners' Supervisory Duties Report and Ratification of the Financial Report of the Micro and Small Business Funding Program (PUMK) for the Fiscal Year 2022, as well as granting full release and discharge (volledig acquit et de charge) to the Company's Board of Directors and Board of Commissioners for the management and supervisory actions carried out during the Fiscal Year 2022.		
Number of Shareholders' Inquiries	1 (one) person submitted feedback from the Shareholder or their authorized representatives		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	15,897,630,677 shares, or 99.9999956% of the total shares with valid voting rights present at the meeting.	700 shares, or 0.0000044% of the total shares with valid voting rights present at the meeting.	36,746,989 shares, or 0.2311476% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions	1. Approved the Company's Annual Report including the Board of Commissioners' Supervisory Duties Report for the Fiscal Year 2022. 2. Ratified: a. The Company's Consolidated Financial Report for the Fiscal Year 2022, which was audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partner (a member firm of the PwC global network) according to Report No. 00007/2.1025/AU.1/07/0222-2/1/I/2023 dated January 20, 2023 with a fair opinion in all material respects on the Group's consolidated financial position as of December 31, 2022, as well as the consolidated financial performance and consolidated cash flows for the year ending on that date in accordance with Financial Accounting Standards in Indonesia. b. The Financial Report of the Micro and Small Business Funding Program (PUMK) for the Fiscal Year 2022, which has been audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partner (a member firm of the PwC global network) according to Report No. 00033/2.1025/AU.2/07/0222-2/1/II/2023 dated February 3, 2023 with a fair opinion in all material respects on the financial position of the MSE Funding Program as of December 31, 2022, as well as the financial performance and cash flows for the year ending on that date, in accordance with the Financial Accounting Standards for Entities Without Public Accountability 3. Provided full release and discharge (volledig acquit et de charge) to all members of the Board of Directors and members of the Board of Commissioners for the management and supervision actions they carried out during Fiscal Year 2022, so long as these actions were not criminal acts and such actions are reflected in the Annual Report, Company Consolidated Financial Report and Micro and Small Business Funding Program Report (PUMK) for the Fiscal Year 2022.		
Follow-up on the Meeting's Decision	Resolutions were realized immediately		
Realization	Already realized		

Agenda II	Approval of the Use of the Company's Net Profit for the Fiscal Year 2022		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	15,897,630,677 shares, or 99.9999956% of the total shares with valid voting rights present at the meeting.	700 shares, or 0.0000044% of the total shares with valid voting rights present at the meeting.	18,526,840 shares, or 0.1165384% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions	Approved the Use of the Company's Net Profit for the Fiscal Year 2022, amounting to Rp18,312,053,106,091, with the following details: 1. 40% (forty percent) of the Company's Net Profit, or amounting to Rp7,324,821,242,436, is designated to be distributed as cash dividends to the shareholders, with the following payment terms: a. The dividend portion for the State, representing 60% (sixty percent) of the shares, or amounting to Rp4,394,892,745,535, will be deposited into the State Treasury General Account . b. The dividend for the ownership of 40% (forty percent) of the public shares, amounting to Rp2,929,928,496,893, will be distributed to the shareholders in accordance with their respective ownership proportions. c. Grant authority and power to the Board of Directors of the Company with substitution rights to determine the schedule, procedure, and implementation of the dividend payment for the Fiscal Year 2022 in accordance with the applicable provisions. 2. 60% (sixty percent) of the Company's Net Profit, or amounting to Rp10,987,231,863,663, is designated as Retained Earnings.		
Follow-up on the Meeting's Decision	BNI has distributed Dividends to Shareholders on April 14, 2023.		
Realization	Already realized		

Agenda III [ACGS A.2.1]	Determination of Remuneration (Salary/Honorarium, Facilites, and Benefits) for 2023 and Tantiem for Fiscal Year 2022 for the Company's Board of Directors and Board of Commissioners.		
Number of Shareholders' Inquiries	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	15,306,843,571 shares, or 96.2837998% of the total shares with valid voting rights present at the meeting.	590,787,806 shares, or 3.7162002% of the total shares with valid voting rights present at the meeting.	30,608,898 shares, or 0.1925375% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions [ACGS A.2.1]	1. Granted authority and power of attorney to Series A Dwiwarna Shareholders to determine the amount of Tantiem for Fiscal Year 2022, as well as to determine the salaries/honorarium, benefits, facilities, and other incentives, including but not limited to Long Term Incentives, for members of the Board of Commissioners for 2023. 2. Granted authority and power to the Board of Commissioners, with prior written approval from the Series A Dwiwarna Shareholders, to determine the amount of the Bonus for the 2022 Fiscal Year, as well as to set the salary/honorarium, allowances, facilities, and other incentives including but not limited to Long Term Incentives, for the members of the Board of Directors for the year 2023.		
Follow-up on the Meeting's Decision	The Series A Dwiwarna Shareholders have determined the amount of the Bonus for the 2022 Fiscal Year, as well as set the salary/honorarium, allowances, facilities, and other incentives including but not limited to Long Term Incentives, for the members of the Board of Commissioners for the year 2023 based on the Ministry of SOEs Letter No. SR-25/Wk2.MBU.A/07/2023 dated July 4, 2023. The Board of Commissioners, with prior approval from the Series A Dwiwarna Shareholders, has determined the amount of the Bonus for the 2022 Fiscal Year, as well as set the salary/honorarium, allowances, facilities, and other incentives including but not limited to Long Term Incentives, for the members of the Board of Directors for the year 2023 based on Letter No. DK/84 dated July 5, 2023.		
Realization	Already realized		

Agenda IV	Appointment of Public Accountant and/or Public Accounting Firm to Audit the Company's Consolidated Financial Statements and the Micro and Small Business Funding Program (PUMK) Financial Statements for the 2023 Fiscal Year		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	15.894.478.077 shares, or 99,9801650% of the total shares with valid voting rights present at the meeting.	3.153.300 shares, or 0,0198350% of the total shares with valid voting rights present at the meeting.	18.524.998 shares, or 0,1165268% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions	1. Approved the appointment of the Tanudiredja, Wibisana, Rintis & Partner Public Accounting Firm (a member firm of the PcW Global network), as the Public Accounting Firm that will audit the Company's Consolidated Financial Statements, Micro and Small Business Funding Program Reports (PUMK), as well as other reports for Fiscal Year 2023. 2. Granted power and authority to the Company's Board of Commissioners to determine the honorarium and other requirements related to the appointment of the Public Accountant and/or Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partner (a member firm of the PcW Global network), and to dismiss and appoint Substitute Public Accountants and/or Public Accounting Firms in the event that the appointed Publi Accounting Firm for whatever reason is unable to complete the audit of the Company's Consolidated Financial Statements, Micro and Small Business Funding Program Report (PUMK) and other reports for the Fiscal Year 2023, including determining the honorarium and other requirements for the Substitute Public Accountant and/or the Public Accounting Firm.		
Follow-up on the Meeting's Decision	Already realized. The Company reported the appointment of the Company's Public Accountants and/or Public Accounting Firm via Letter No CSE/7/1786 dated March 21, to 2023.		
Realization	Already realized		

Agenda V	Approval of the Company's Share Buyback Plan and the Transfer of Buyback Shares Held as Treasury Stock		
Number of Shareholders' Inquiries	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	13,698,324,747 shares, or 86.1658220% of the total shares with valid voting rights present at the meeting.	2,199,306,630 shares, or 13.8341780% of the total shares with valid voting rights present at the meeting.	20,129,598 shares, or 0.1266201% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions	1. Approved the buyback of the Company's shares that have been issued and listed on the Indonesia Stock Exchange (BEI) with a total nominal value of all buybacks of a maximum of Rp905,000,000,000. 2. Granted power and authority to carry out the buyback of the Company's shares to the Company's Board of Directors. 3. Approved the Share Ownership Program for Employees and/or the Share Ownership Program for Board of Directors and Board of Commissioners as one of the options for transferring shares resulting from the buyback that are held as treasury stock. 4. Granted power and authority to implement the Share Ownership Program for Employees and/or Share Ownership Program for the Board of Directors and Board of Commissioners to: a. The Company's Board of Directors with the approval of the Series A Dwiwarna Shareholders to implement the Share Ownership Program for the Board of Directors and Board of Commissioners; b. The Company's Board of Directors to implement the Share Ownership Program for Employees; while still paying attention to applicable laws and regulations.		
Follow-up on the Meeting's Decision	BNI has completed the buyback period until September 15, 2024, as stated in BNI's Letter No. CSE/7/6082 dated September 17, 2024		
Realization	Already realized		

Agenda VI	Approval of the Company's Recovery Plan and Resolution Plan		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	15,897,630,677 shares, or 99.9999956% of the total shares with valid voting rights present at the meeting.	700 shares, or 0.0000044% of the total shares with valid voting rights present at the meeting.	20,593,255 shares, or 0.1295366% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions	1. Approved the Company's Updated Action Plan (Recovery Plan) for the Year 2022/2023; and 2. Approved the Company's 2022 Resolution Plan.		
Follow-up on the Meeting's Decision	Resolution immediately effective		
Realization	Already realized		

Agenda VII	Ratification and Reporting of the Implementation of the Delegation of Authority to the Board of Commissioners to Approve the Founders' Written Statement in Relation to the Amendment of the Company's Pension Fund Regulations Based on the GMS Resolution in Deed Number 42 of 1999		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	13,607,268,523 shares, or 85.5930560% of the total shares with valid voting rights present at the meeting.	2,290,362,854 shares, or 14.4069440% of the total shares with valid voting rights present at the meeting.	29,074,553 shares, or 0.1828861% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions	1. Approved the ratification of the delegation of authority from the GMS to the Board of Commissioners to approve the Founders' Written Statement in relation to the Amendment of the Company's Pension Fund Regulations based on Deed Number 42 of 1999, which is still in effect to this day. 2. Approve the re-delegation of authority from the GMS to the Board of Commissioners to approve the Founders' Written Statement in relation to the amendment of the Company's Pension Fund Regulations, and thereafter, periodic reaffirmation will be requested from the GMS every 3 (three) years.		
Follow-up on the Meeting's Decision	The resolutions were immediately effective		
Realization	Realized		

Agenda VIII	Report on The Realization of the Use of Funds from the Public Offering of PT Bank Negara Indonesia (Persero) Tbk Environmentally Friendly Bonds (Green Bond) in 2022
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses
Voting Result	**This agenda item is a report to the GMS in accordance with applicable regulations, therefore no decision was made on this agenda item**
Meeting Resolutions	The Report on the Realization of the Use of Funds from the Public Offering of Environmental-Awareness Bonds (Green Bond) I PT Bank Negara Indonesia (Persero) Tbk for the Year 2022 is a report, therefore no decision was made.
Follow-up on the Meeting's Decision	-
Realization	-

Agenda IX [ACGS A.2.3]	Changes in the Composition of the Company's Management		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	12,197,412,856 shares, or 76.7247181% of the total shares with valid voting rights present at the meeting.	3,700,218,521 shares, or 23.2752819% of the total shares with valid voting rights present at the meeting.	47,039,429 shares, or 0.2958895% of the total shares with valid voting rights present at the meeting.

Meeting Resolutions
[ACGS A.2.3]

1. Respectfully dismissed Mr. Sigit Widyawan as the Independent Commissioner of the Company, who was appointed based on the Annual GMS Resolution for the 2017 Fiscal Year dated March 20, 2018, effective as of the closing of the GMS, with thanks for his contributions of time and thought during his tenure as a member of the Company's Board.
2. Changed the nomenclature of positions for members of the Company's Board of Directors as follows

No.	Previous	To Become
1.	Treasury Director	Retail Banking Director
2.	Consumer Banking Director	Digital and Integrated Transaction Banking Director
3.	Corporate and International Banking Director	Wholesale and International Banking Director

3. Transferred the assignments of the following names as members of the Company's Board of Directors:

No.	Name	Previous	To Become
1.	Putrama W. Setyawan	Treasury Director	Retail Banking Director
2.	Corina Leyla Karnalies	Dirktur Consumer Banking Director	Digital and Integrated Transaction Banking Director
3.	Silvano Winston Rumantir	Corporate and International Banking Director	Wholesale and International Banking Director
4.	Muhammad Iqbal	Enterprise and Commercial Banking Director	Institutional Banking Director
3.	Sis Apik Wijayanto	Institutional Banking Director	Enterprise and Commercial Banking Director

Each of whom was appointed based on the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2022 dated August 31, 2022, the Annual General Meeting of Shareholders (GMS) Resolution for the 2019 Fiscal Year dated February 20, 2020 in conjunction with the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2022 dated August 31, 2022, the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2020 dated September 2, 2020 in conjunction with the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2022 dated August 31, 2022, the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2020 dated September 2, 2020 in conjunction with the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2022 dated August 31, 2022, and the Annual General Meeting of Shareholders (GMS) Resolution for the 2019 Fiscal Year dated February 20, 2020 in conjunction with the Extraordinary General Meeting of Shareholders (EGMS) Resolution for 2022 dated August 31, 2022, with their term of office continuing for the remainder of their respective terms, in accordance with the relevant appointment resolution from the GMS.

4. Appointed the following names to the Company Management:
   1) Mr. Sigit Widyawan - as Independent Commissioner;
   2) Sdr. Robertus Billitea – as Commissioner.
5. The term of office of the members of the Board of Commissioners appointed as referred to in point 4 shall be in accordance with the provisions of the Company's Articles of Association, with due regard to the laws and regulations in the Capital Market sector, and without prejudice to the GMS's right to dismiss them at any time.
6. With the changes in job titles and the transfer of duties of the members of the Board of Directors as referred to in points 2 and 3, as well as the dismissal and appointment of members of the Board of Commissioners as referred to in points 1 and 4, the composition of the members of the Board of Directors and the Board of Commissioners of the Company shall be as follows:
   a. Board of Directors
      1) President Director: Royke Tumilaar
      2) Deputy President Director: Adi Sulistyowati
      3) Digital and Integrated Transaction Banking Director: Corina Leyla Karnalies
      4) Enterprise and Commercial Banking Director: Sis Apik Wijayanto
      5) Finance Director: Novita Widya Anggraini
      6) Risk Management Director: David Pirzada
      7) Institutional Banking Director: Muhammad Iqbal
      8) Network and Services Director: Ronny Venir
      9) Retail Banking Director: Putrama W. Setyawan
      10) Technology and Operations Director: Toto Prasetio
      11) Human Capital and Compliance Director: Mucharom
      12) Wholesale and International Banking Director: Silvano Winston Rumantir

   b. Board of Commissioners
      1) President Commissioner/Independent Commissioner: Agus Dermawan Wintarto Martowardojo
      2) Vice President Commissioner: Pradjoto

	3) Commissioner: Askolani 4) Commissioner: Susyanto 5) Commissioner: Fadlansyah Lubis 6) Commissioner: Robertus Billitea 7) Independent Commissioner: Erwin Rijanto 8) Independent Commissioner: Sigit Widyawan 9) Independent Commissioner: Asmawi Syam 10) Independent Commissioner: Septian Hario Seto 11) Independent Commissioner: Iman Sugema 7. A member of the Board of Commissioners appointed as referred to in point 4, who still holds another position that is prohibited by the prevailing laws and regulations from being held concurrently with the position of a member of the Board of Directors or the Board of Commissioners in a State-Owned Enterprise, must resign or be dismissed from that position. 8. Grant authority with the right of substitution to the Board of Directors of the Company to declare the decisions made in this GMS in the form of a Notarial Deed, to appear before a Notary or authorized official, and to make any necessary adjustments or corrections if required by the relevant authorities for the implementation of the meeting's resolutions.
Follow-up on the Meeting's Decision	Resolutions are immediately effective
Realization	Realized

Realization of Dividend Payment

In connection with Agenda Item II of the Annual GMS for the 2022 Fiscal Year regarding the Approval of the Use of Net Profit for the 2022 Fiscal Year, BNI has made a Cash Dividend payment based on the performance of the 2022 Fiscal Year with the following details:

Cash Dividends Distributed (Rp-billion)	IDR7,324,821,242,436,-
Dividends per Share (IDR)	IDR392.780105040
Dividend Distribution Ratio from Net Profit for the Year Attributable to Owners of the Parent Entity for Fiscal Year 2023 (%)	40%
Announcement Date	March 16, 2023
Payment Date	April 14, 2023

MINUTES OF RESOLUTIONS OF THE EXTRAORDINARY GMS, SEPTEMBER 19, 2023

The decision of the Extraordinary General Meeting of Shareholders (EGMS) 2023 has been documented in Deed No. 17 dated September 19, 2023, created by and in the presence of Ashoya Ratam, S.H., M.Kn., a Notary in South Jakarta Administrative City (Notary). The details of the decision of the Extraordinary General Meeting of Shareholders dated September 19, 2023, are as follows:

Agenda I	Approval of the Stock Split and the Amendment of Article 4 of the Company's Articles of Association regarding the Company's Capital.		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Results of Voting [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	15.783.001.088 shares, or 99,9999721% of the total shares with valid voting rights present at the meeting.	4.400 shares, or 0,0000279% of the total shares with valid voting rights present at the meeting.	31.887.016 shares, or 0,2020339% of the total shares with valid voting rights present at the meeting.
Meeting Resolution	1. Approved the implementation of the Company's Stock Split with a ratio of 1:2 (one to two), thus: a. The nominal value per Series A Dwiwarna Share and Series B Share will be reduced from Rp7,500 (seven thousand five hundred rupiah) to Rp3,750 (three thousand seven hundred fifty rupiah), with the following provisions: i. 1 (one) Series A Dwiwarna share will remain as a Series A Dwiwarna share owned by the Republic of Indonesia, with a nominal value of Rp3,750 (three thousand seven hundred fifty rupiah); and ii. 1 (one) Series A Dwiwarna share will become 1 (one) Series B share owned by the State of the Republic of Indonesia with a nominal of Rp3,750,- per share; b. The nominal value per Series C Share will be reduced from Rp375 (three hundred seventy-five rupiah) to Rp187.5 (one hundred eighty-seven point five rupiah). 2. In connection with the Company's Stock Split, it is agreed to amend Article 4 paragraphs (1) and (2) of the Articles of Association. Therefore, Article 4 paragraphs (1) and (2) will read as follows:		

	CAPITAL Article 4 1. The authorized capital of the Company is Rp15,000,000,000,000.00 (fifteen trillion rupiah), which is divided into: a. 1 (one) Series A Dwiwarna share, with a nominal value of Rp3,750.00 (three thousand seven hundred fifty rupiah); b. 578,683,733 (five hundred seventy-eight million six hundred eighty-three thousand seven hundred thirty-three) Series B shares, each with a nominal value of Rp3,750.00 (three thousand seven hundred fifty rupiah); and c. 68,426,325,320 (sixty-eight billion four hundred twenty-six million three hundred twenty-five thousand three hundred twenty) Series C shares, each with a nominal value of Rp187.50 (one hundred eighty-seven point five rupiah); 2. Of the authorized capital, approximately 54.05% (fifty-four point zero five percent) or a total of 37,297,312,916 (thirty-seven billion two hundred ninety-seven million three hundred twelve thousand nine hundred sixteen) shares have been issued, subscribed, and paid-up, with a total nominal value of Rp9,054,806,974,125.00 (nine trillion fifty-four billion eight hundred six million nine hundred seventy-four thousand one hundred twenty-five rupiah), which consists of: a. 1 (one) Series A Dwiwarna share, with a nominal value of Rp3,750.00 (three thousand seven hundred fifty rupiah); b. 578,683,733 (five hundred seventy-eight million six hundred eighty-three thousand seven hundred thirty-three) Series B shares, with a total nominal value of Rp2,170,063,998,750.00 (two trillion one hundred seventy billion sixty-three million nine hundred ninety-eight thousand seven hundred fifty rupiah); c. 36,718,629,182 (thirty-six billion seven hundred eighteen million six hundred twenty-nine thousand one hundred eighty-two) Series C shares, with a total nominal value of Rp6,884,742,971,625.00 (six trillion eight hundred eighty-four billion seven hundred forty-two million nine hundred seventy-one thousand six hundred twenty-five rupiah). 3. Approved to grant authority and power to the Board of Directors of the Company, with the right of substitution, to take all necessary actions in connection with the implementation of the Company's Stock Split, including but not limited to organizing and determining the procedures and schedule for the implementation of the stock nominal value split (Stock Split) in accordance with the regulations in the Capital Markets sector, to formalize/record this decision in a deed made before a Notary, including confirming the composition of the Company's shareholders (if necessary), and/or amending the Company's Articles of Association in this Meeting's resolution to the relevant authorities, as well as to take all necessary actions in accordance with the applicable laws and regulations.
Meeting Resolution Follow Up	The decision has been enacted. The results of the Stock Split were implemented starting on October 10, 2023, based on the letter from PT Bursa Efek Indonesia Number Peng-00240/BEI.POP/10-2023 dated October 5, 2023, regarding the matter. The amendment to the Articles of Association has been received by the Ministry of Law and Human Rights through Letter Number AHU-AH.01.03-0119983 dated September 19, 2023. The Deed of Amendment to the Articles of Association No. 18 dated September 19, 2023, has been reported to the OJK through Letter Number CSE/7/6636 dated October 12, 2023.
Realization	Already realized

Agenda II [ACGS A.2.3]	Changes in the Composition of the Company's Management		
Number of Shareholders' Inquiries	No Shareholders submitted questions or responses		
Results of Voting [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	12,114,010,739 shares, or 76.7535103% of the total shares with valid voting rights present at the meeting.	3,668,994,749 shares, or 23.2464897% of the total shares with valid voting rights present at the meeting.	37,581,516 shares, or 0.2381138% of the total shares with valid voting rights present at the meeting.
Meeting Resolution [ACGS A.2.3]	1. Honorably dismissed Mr. Agus Dermawan Wintarto Martowardojo from his position as President Commissioner/Independent Commissioner of the Company, appointed based on the resolution of the Annual General Meeting of Shareholders for the 2019 fiscal year on February 20, 2020, effective from the closing of the General Meeting of Shareholders, with thanks for the contributions of time and thought during his tenure as the Company's Management; 2. Transferred the assignment of Mr. Pradjoto from his previous position as Deputy President Commissioner/Independent Commissioner to President Commissioner/Independent Commissioner of the Company, appointed based on the resolution of the Annual General Meeting of Shareholders for the 2019 fiscal year on February 20, 2020, with a term of office continuing the remainder of his previous term as per the resolution of the General Meeting of Shareholders that appointed him.		

	3. Appointed Sdr. Pahala Nugraha Mansury as sebagai Deputy President Commissioner of the Company. 4. The term of office of the members of the Board of Commissioners appointed as referred to in item 3, in accordance with the provisions of the Company's Articles of Association, with due regard to the laws and regulations in the Capital Markets sector, and without prejudice to the right of the General Meeting of Shareholders to dismiss them at any time. 5. With the dismissal, transfer of duties, and appointment of the members of the Board of Commissioners of the Company as referred to in items 1, 2, and 3, the composition of the members of the Company's Board of Commissioners will be as follows: 1) President Commissioner/Independent Commissioner: Pradjoto 2) Vice President Commissioner: Pahala Nugraha Mansury 3) Commissioner: Askolani 4) Commissioner: Susyanto 5) Commissioner: Fadlansyah Lubis 6) Commissioner: Robertus Billitea 7) Independent Commissioner: Erwin Rijanto 8) Independent Commissioner: Sigit Widyawan 9) Independent Commissioner: Asmawi Syam 10) Independent Commissioner: Septian Hario Seto 11) Independent Commissioner: Iman Sugema 6. The members of the Board of Commissioners who are reassigned as referred to in item 2 and appointed as referred to in item 3 can only carry out their duties after obtaining approval from the Financial Services Authority (OJK) regarding the Capability and Fitness Assessment (Fit & Proper Test) and complying with the applicable laws and regulations. In the event that the member of the Board of Commissioners is later declared not approved as a member of the Board of Commissioners in the Capability and Fitness Assessment (Fit & Proper Test) by the OJK, the member of the Board of Commissioners will be honorably dismissed starting from the date the decision of the OJK's Capability and Fitness Assessment (Fit & Proper Test) results is issued. 7. Requested the Board of Directors to submit a written application to the Financial Services Authority (OJK) for the implementation of the Capability and Fitness Assessment (Fit & Proper Test) for the members of the Board of Commissioners who are reassigned as referred to in item 2 and appointed as referred to in item 3. 8. A member of the Board of Commissioners appointed as referred to in item 3 who still holds another position that is prohibited by regulations from being held concurrently with the position of a Board of Commissioners member in a State-Owned Enterprise must resign or be dismissed from that position. 9. Granted authority with the right of substitution to the Board of Directors of the Company to declare the decisions made by this General Meeting of Shareholders in the form of a Notarial Deed, as well as to appear before a Notary or authorized official and make any necessary adjustments or corrections if required by the relevant authorities for the implementation of the meeting's decision.
Meeting Resolution Follow Up	The resolutions were effective immediately
Realization	Already realized.

Board of Commissioners

The Board of Commissioners is a key organ within the Bank's Governance structure, responsible for overseeing the Board of Directors in managing the Bank and providing advice or recommendations to the Board of Directors in determining the direction of the Bank's performance objectives, as well as ensuring the Bank's compliance with all applicable laws and regulations. Additionally, the Board of Commissioners also ensures that the Bank has implemented the principles of Good Corporate Governance at every level of the organisation.

LEGAL BASIS

The establishment and appointment of BNI's Board of Commissioners are guided by several legal foundations and regulations, including:

1) Law No. 40 of 2007 concerning Limited Liability Companies, as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
2) Law of the Republic of Indonesia No. 19 of 2003, dated June 19, 2003, concerning State-Owned Enterprises, as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
3) Financial Services Authority Regulation No. 33/POJK.04/2014, dated December 8, 2014, concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies;
4) Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, concerning the Implementation of Governance for Commercial Banks;
5) Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
6) Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 dated March 20, 2023, concerning the Organs and Human Resources of State-Owned Enterprises;
7) The Bank's Articles of Association.

BOARD OF COMMISSIONERS CHARTER [ACGS D.1.1]

The collaboration between the Board of Commissioners, the Board of Directors, and other governance bodies is clearly defined in the Board of Commissioners Charter, as formalized through BNI's Board of Commissioners Decree No. KEP/024/DK/2024 dated October 22, 2024. The Board of Commissioners Charter serves as a guideline and code of conduct for the Board of Commissioners, providing a reference for the execution of their duties and responsibilities in overseeing the management policies and the conduct of the Company's operations by the Board of Directors in accordance with the principles of Good Corporate Governance (GCG). This Charter is binding on all members of the Board of Commissioners, serving as a framework to ensure that supervisory duties are performed efficiently, effectively, transparently, independently, and with accountability, thereby promoting robust corporate governance within the Bank. In general, the contents of BNI's Board of Commissioners Charter include:

1. Legal Basis;
2. Structure;
3. Requirements for Board of Commissioners Members;
4. Independent Commissioners;
5. Duties, Authorities, Obligations, and Responsibilities of the Board of Commissioners;
6. Appointment and Dismissal of Board of Commissioners Members;
7. Term of Office and Vacant Positions within the Board of Commissioners;
8. Meetings of the Board of Commissioners and Joint Meetings with the Board of Directors;
9. Division of Work and Working Hours of the Board of Commissioners;
10. Committees under the Board of Commissioners;
11. Secretariat of the Board of Commissioners and the Corporate Secretary to the Board of Commissioners;
12. Corporate Values;
13. Work Ethics and Prohibitions for the Board of Commissioners;
14. Transparency; and
15. Induction Program.

The Board of Commissioners Charter is periodically reviewed and updated in accordance with applicable laws and regulations in Indonesia. This Charter is accessible on BNI's official website.

CRITERIA OR QUALIFICATIONS OF THE BOARD OF COMMISSIONERS [ACGS D.3.9, D.3.11]

All candidates and members of the BNI Board of Commissioners who are in office are confirmed to have met the criteria set out in the BNI GCG Policy as follows:

1. Members of the Board of Commissioners are appointed and dismissed by a GMS which must be attended by Series A Dwiwarna Shareholders and the decision of the GMS must be approved by Series A Dwiwarna Shareholders by considering the provisions in the Articles of Association
2. The procedures for appointing members of the Board of Commissioners refer to the OJK regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies and the regulations of the Minister of SOEs concerning SOE Organs and Human Resources. The procedures for appointing members of the Board of Commissioners include:
   a. Sources of prospective candidates for members of the Board of Commissioners come from:
      1) Former Directors of SOEs;
      2) Board of Commissioners/Supervisory Board of SOEs;
      3) Structural Officials and Functional Officials of the Government or
      4) Other sources.
   b. The GMS/Minister may determine candidates proposed by the Nomination and Remuneration Committee to become members of the Board of Commissioners.
   c. The determination of a person as a member of the Board of Commissioners may be carried out after being declared to have passed the Fit and Proper Test (UKK) in accordance with sectoral provisions.
   d. In the event that the appointment of members of the Board of Commissioners is carried out before the UKK in accordance with sectoral provisions, the actions, duties and functions as members of the Board of Commissioners shall be accounted for from the date of being declared to have passed the UKK in accordance with sectoral provisions.
   e. Members of the Board of Commissioners as referred to in point d have an effective term of office since being determined by the GMS/Minister.
   f. The curriculum vitae (CV) of prospective members of the Board of Commissioners who will be proposed for appointment at the GMS must be available and announced at the time of the GMS before the decision is made regarding the appointment as members of the Board of Commissioners.
3. Every proposal for the replacement and/or appointment of members of the Board of Commissioners to the GMS must take into account the recommendations of the committee that carries out the nomination function.
4. Members of the committee that carries out the nomination function who have a conflict of interest with the recommended proposal must disclose this in the recommended proposal.
5. Replacement and/or appointment of members of the Board of Commissioners prioritizes professional composition, independence, competency suitability, and attention to diversity in terms of education (field of study), work experience, age, expertise without distinguishing ethnicity, religion, and race, which are needed appropriately in carrying out the duties and responsibilities of the Board of Commissioners.
6. Appointment of members of the Board of Commissioners who come from employees or officials at institutions that carry out regulatory and/or supervisory functions of Banks and/or other financial services institutions is carried out after the person concerned has effectively resigned as an employee or official and has undergone a waiting period of at least 6 (six) months.
7. The GMS (General Meeting of Shareholders) resolution regarding the appointment and dismissal of members of the Board of Commissioners also stipulates the effective date of such appointment and dismissal. In the event that the GMS does not specify the date, the appointment and dismissal of the members of the Board of Commissioners shall become effective as of the closing of the GMS.
8. Members of the Board of Commissioners are appointed for a term commencing from the date determined by the GMS that appointed them and ending at the closing of the fifth (5th) Annual GMS following the date of their appointment, provided that the term shall not exceed five (5) years. This is subject to the prevailing laws and regulations in the Capital Market and Banking sectors, without prejudice to the right of the GMS to dismiss any member of the Board of Commissioners at any time before the expiration of their term. Upon the expiration of their term, members of the Board of Commissioners may be reappointed by the GMS for one additional term.
9. Individuals eligible for appointment as members of the Board of Commissioners must meet the following requirements at the time of appointment and throughout their term:
   a. Possess good character, morals, and integrity, and be legally competent.

b. Within five (5) years prior to appointment and during the term of office:
   1) Have never been declared bankrupt;
   2) Have never served as a member of the Board of Directors and/or Board of Commissioners held responsible for causing a company to be declared bankrupt;
   3) Have never been convicted of a criminal offense that caused financial loss to the state and/or is related to the financial sector;
   4) Have never served as a member of the Board of Directors and/or Board of Commissioners who, during their term of office:
      a) Failed to convene an Annual GMS;
      b) Had their accountability as a member of the Board of Directors and/or Board of Commissioners rejected by the GMS or failed to provide such accountability to the GMS; and
      c) Caused a company holding licenses, approvals, or registrations from the Financial Services Authority (OJK) to fail in fulfilling its obligation to submit annual reports and/or financial statements to the OJK or whose annual reports and/or financial statements were not approved and/or ratified by the GMS.

c. Possess knowledge and/or expertise in fields required by the Company, along with other qualifications as stipulated by the applicable laws and regulations governing the Company.
d. Have a time commitment to the company.

10. The mechanisms for the appointment, replacement, dismissal, and/or resignation of members of the Board of Commissioners shall be guided by the prevailing laws and regulations as well as the Company's Articles of Association.

TERM OF OFFICE OF THE BOARD OF COMMISSIONERS [ACGS D.2.5, D.3.11]

As stipulated in the Charter of the Board of Commissioners, the maximum term of office for members of the Board of Commissioners is two (2) consecutive terms, with the following provisions:

1) Members of the Board of Commissioners are appointed for a term commencing from the date determined by the General Meeting of Shareholders (GMS) that appoints them and ending at the close of the fifth (5th) Annual GMS following their appointment date, provided that it does not exceed a period of five (5) years, in accordance with prevailing capital market and banking regulations. However, this does not preclude the right of the GMS to dismiss members of the Board of Commissioners at any time before the end of their term; and
2) Upon the expiration of their term, members of the Board of Commissioners may be reappointed by the GMS for one (1) additional term of office.

STRUCTURE, NUMBER, AND COMPOSITION OF THE BOARD OF COMMISSIONERS IN 2024

The number and composition of BNI's Board of Commissioners have been aligned with the requirements to ensure the effective, objective, and independent execution of the Bank's supervisory functions. All members of the Bank's Board of Commissioners meet the requirements regarding the number, composition, and other provisions set forth in BNI's Board of Commissioners Charter, as follows:

1) As of December 31, 2024, BNI's Board of Commissioners consists of 11 (eleven) members, comprising 1 (one) President Commissioner/ Independent Commissioner, 1 (one) Vice President Commissioner, and 9 (nine) other Commissioners;
2) The number of members of BNI's Board of Commissioners does not exceed the number of members of BNI's Board of Directors;
3) The Board of Commissioners is led by the President Commissioner, who is independent of the Controlling Shareholder, other members of the Board of Commissioners, and members of BNI's Board of Directors;
4) The replacement and/or appointment of members of BNI's Board of Commissioners has considered the recommendations of the Nomination and Remuneration Committee, obtained the approval of shareholders, and received the approval of the Financial Services Authority (OJK);
5) None of the members of BNI's Board of Commissioners have family relationships up to the third degree with fellow members of the Board of Commissioners and/or the Board of Directors and
6) All members of BNI's Board of Commissioners have passed the Fit and Proper Test.

In connection with the dismissal and appointment of members of the Board of Commissioners based on the resolutions of the 2024 Annual GMS held on March 4, 2024, the composition of BNI's Board of Commissioners has changed, as detailed below:

Period January 1, 2024 – March 4, 2024:

During the period from January 1, 2024, to March 4, 2024, BNI's Board of Commissioners consisted of 11 (eleven) members, comprising 1 (one) President Commissioner/Independent Commissioner, 1 (one) Vice President Commissioner, and 9 (nine) other Commissioners.

Composition of the Board of Commissioners January 1, 2024 - March 4, 2024

Name	Position	Domicile	Date of Appointment	Effective Date of Appointment
Pradjoto	President Commissioner/ Independent Commissioner	Jakarta	EGMS September 19, 2023	February 19, 2024
Pahala Nugraha Mansury	Vice President Commissioner	Jakarta	EGMS September 19, 2023	February 19, 2024
Sigit Widyawan	Independent Commissioner	Solo	AGMS March 15, 2023	March 15, 2023
Askolani	Commissioner	Jakarta	AGMS March 4, 2024	March 4, 2024
Asmawi Syam	Independent Commissioner	Jakarta	AGMS February 20, 2020	June 15, 2020
Septian Hario Seto	Independent Commissioner	Jakarta	AGMS February 20, 2020	August 14, 2020
Iman Sugema	Independent Commissioner	Bogor	AGMS February 20, 2020	August 14, 2020
Erwin Rijanto Slamet	Independent Commissioner	Jakarta	AGMS March 29, 2021	August 6, 2021
Fadlansyah Lubis	Commissioner	Jakarta	EGMS August 31, 2022	December 23, 2022
Robertus Billitea	Commissioner	Jakarta	AGMS March 15, 2023	September 11, 2023
Susyanto[1)]	Commissioner	Bogor	AGMS February 20, 2020	July 27, 2020

[1)] Ceased as Commissioner since March 4, 2024

Period of March 4, 2024 – December 31, 2024

During the period of March 4, 2024 – December 31, 2024, there was a change in the composition of the Board of Commissioners based on the resolution of the 2024 Annual General Meeting of Shareholders (AGMS) held on March 4, 2024. Following this change, the structure and composition of BNI's Board of Commissioners are as follows:

Composition of the Board of Commissioners March 4, 2024 – December 31, 2024

Name	Position	Domicile	Legal Basis of Appointment	Effective Date of Appointment
Pradjoto	President Commissioner/ Independent [ACGS D.4.2]	Jakarta	EGMS September 19, 2023	February 19, 2024
Pahala Nugraha Mansury	Vice President Commissioner	Jakarta	EGMS September 19, 2023	February 19, 2024
Sigit Widyawan	Independent Commissioner	Solo	AGMS March 15, 2023	March 15, 2023
Askolani	Commissioner	Jakarta	AGMS March 4, 2024	March 4, 2024
Asmawi Syam	Independent Commissioner	Jakarta	AGMS February 20, 2020	June 17, 2020
Septian Hario Seto	Independent Commissioner	Jakarta	AGMS February 20, 2020	August 14, 2020
Iman Sugema	Independent Commissioner	Bogor	AGMS February 20, 2020	August 14, 2020
Erwin Rijanto Slamet	Independent Commissioner	Jakarta	AGMS March 29, 2021	August 6, 2021
Fadlansyah Lubis	Commissioner	Jakarta	EGMS August 31, 2022	December 23, 2022
Robertus Billitea	Commissioner	Jakarta	AGMS March 15, 2023	September 11, 2023
Mohamad Yusuf Permana	Commissioner	Bogor	AGMS March 4, 2024	September 2, 2024

As of December 31, 2024, BNI does not have any female Independent Commissioners. With the current composition of the Board of Commissioners, the Bank ensures that none of the Commissioners (including Independent Commissioners) have served more than two consecutive five-year terms in the same capacity. Detailed disclosures regarding the career history of each Commissioner can be found in the Company Profile chapter, under the Board of Commissioners Profile sub-chapter, in the 2024 Annual Report. [ACGS (B)E.1.1]

Basis for the Appointment of the Board of Commissioners Members

The appointment and dismissal of members of the Board of Commissioners are carried out by the General Meeting of Shareholders (GMS) in accordance with the provisions of Article 14, paragraph (12) of the Bank's Articles of Association. The appointment details of each member of the Board of Commissioners are presented in the table below:

No.	Name	Position	Legal Basis of Appointment	Term of Office
1	Pradjoto	President Commissioner/ Independent Commissioner	EGMS September 19, 2023	2020-2025*
2	Pahala Nugraha Mansury	Vice President Commissioner	EGMS September 19, 2023	2023-2028
3	Sigit Widyawan	Independent Commissioner	AGMS March 15, 2023	2023-2028
4	Askolani	Commissioner	AGMS March 4, 2024	2024-2029
5	Asmawi Syam	Independent Commissioner	AGMS February 20, 2020	2020-2025
6	Septian Hario Seto	Independent Commissioner	AGMS February 20, 2020	2020-2025
7	Iman Sugema	Independent Commissioner	AGMS February 20, 2020	2020-2025
8	Erwin Rijanto Slamet	Independent Commissioner	AGMS March 29, 2021	2021-2026
9	Fadlansyah Lubis	Commissioner	EGMS August 31, 2022	2022-2027
10	Robertus Billitea	Commissioner	AGMS March 15, 2023	2023-2028
11	Mohamad Yusuf Permana	Commissioner	AGMS March 4, 2024	2024-2029

* Following his previous tenure as Vice President Commissioner/Independent Commissioner of BNI

Based on the disclosure table above, it can be seen that BNI's Board of Commissioners is led by the President Commissioner, who is an Independent Commissioner or a professional from outside the Bank. Referring to BNI's internal provisions and global governance best practices, the Bank ensures that Mr. Pradjoto, as the President Commissioner/ Independent Commissioner of BNI, has not served as the President Director of BNI in the last 3 (three) years. [ACGS D.4.2]

MECHANISM FOR APPOINTMENT, TERMINATION, AND RESIGNATION OF THE BOARD OF COMMISSIONERS [ACGS A.2.3, D.3.10]

The procedures for the termination and resignation of members of the Board of Commissioners are governed by the Bank's Articles of Association and are also in line with the provisions of POJK No. 33/ POJK.04/2014 and POJK No. 15/POJK.04/2020, as follows:

1) Members of the Board of Commissioners are appointed and dismissed by the General Meeting of Shareholders (GMS), which must be attended by the Series A Dwiwarna shareholders, and the decisions of the meeting must be approved by the Series A Dwiwarna shareholders, in accordance with the provisions of the Articles of Association;
2) Members of the Board of Commissioners may be dismissed at any time based on a decision of the GMS, which must specify the reasons for such dismissal. The reasons for dismissal of a member of the Board of Commissioners include, but are not limited to:
   a. Failure to perform their duties properly;
   b. Violating the provisions of the Articles of Association and/or laws and regulations;
   c. Being involved in actions that harm the Company and/or the state;
   d. Engaging in actions that violate ethics and/or propriety expected of a member of the Board of Commissioners;
   e. Being found guilty by a court ruling that has permanent legal force;
   f. Resignation.
3) In addition to the reasons mentioned above, members of the Board of Commissioners may also be dismissed by the GMS for other reasons deemed appropriate by the GMS in the best interest of the Company;
4) A decision for dismissal based on reasons under items 2 (a), (b), (c), and (d) and item 3 above will be taken after the individual concerned has been given the opportunity to defend themselves at the GMS;
5) Dismissal under item 2 (c) and (e) above will be considered an unjustified dismissal;
6) There shall be no familial relationship between members of the Board of Commissioners and

between Board of Commissioners members and Board of Directors members up to the third degree of consanguinity, whether in a direct or collateral line, or by marriage, including in-laws. In such cases, the GMS has the authority to dismiss one of the individuals concerned;

7) A member of the Board of Commissioners may resign from their position before the end of their term by providing written notice to the Company;
8) The Company is required to hold a GMS to decide on the resignation of a member of the Board of Commissioners no later than 90 (ninety) days after receiving the resignation letter;
9) The Company must disclose information to the public and submit it to OJK no later than 2 (two) working days after receiving the resignation letter from a member of the Board of Commissioners, as outlined in item 7, and after the GMS is held as described in item 8;
10) Prior to the resignation becoming effective, the resigning member of the Board of Commissioners remains responsible for completing their duties and responsibilities in accordance with the Articles of Association and applicable laws and regulations;
11) A member of the Board of Commissioners who has resigned remains accountable for their actions as a Board member up to the date of approval of their resignation at the GMS;
12) The discharge of responsibility for a resigning member of the Board of Commissioners is granted after the Annual GMS has given approval;
13) If the resignation of a member of the Board of Commissioners results in the number of Commissioners falling below 3 (three) members, the resignation is valid only if the GMS has approved it, and a new member has been appointed, ensuring compliance with the minimum number of Board of Commissioners members;
14) A member's term on the Board of Commissioners ends upon:
    a. The effective date of their resignation, as outlined in item 8;
    b. Death;
    c. Completion of their term;
    d. Dismissal by the GMS
    e. Being declared bankrupt by a Commercial Court ruling that has permanent legal force or being placed under guardianship by court order; and
    f. Failing to meet the qualifications as a member of the Board of Commissioners according to the Articles of Association and other applicable laws.
15) A member of the Board of Commissioners who leaves their position, whether before or after their term ends, except in cases of death, remains responsible for any actions not yet accounted for by the GMS.

FIT AND PROPER TEST

New candidates for the Board of Commissioners of BNI may only carry out their duties, tasks, and functions after receiving approval from OJK. This is in accordance with POJK No. 27/POJK.03/2016 regarding the Fit and Proper Test for Key Parties in Financial Service Institutions. Below is a list of BNI's Board of Commissioners members who have passed the Fit and Proper Test without any remarks and have received OJK approval:

Fit and Proper Test

No.	Name	Position	Organizer	Result	Effective Date Based on OJK Letter
1	Pradjoto	President Commissioner/ Independent Commissioner	Otoritas Jasa Keuangan	Pass	February 19, 2024
2	Pahala Nugraha Mansury	Vice President Commissioner	Otoritas Jasa Keuangan	Pass	Februari 19, 2024
3	Sigit Widyawan	Independent Commissioner	Otoritas Jasa Keuangan	Pass	March 15, 2023
4	Askolani	Commissioner	Otoritas Jasa Keuangan	Pass	March 4, 2024
5	Asmawi Syam	Independent Commissioner	Otoritas Jasa Keuangan	Pass	June 17, 2020
6	Septian Hario Seto	Independent Commissioner	Otoritas Jasa Keuangan	Pass	August 14, 2020
7	Iman Sugema	Independent Commissioner	Otoritas Jasa Keuangan	Pass	August 14, 2020
8	Erwin Rijanto Slamet	Independent Commissioner	Otoritas Jasa Keuangan	Pass	August 6, 2021
9	Fadlansyah Lubis	Commissioner	Otoritas Jasa Keuangan	Pass	December 23, 2022
10	Robertus Billitea	Commissioner	Otoritas Jasa Keuangan	Pass	September 11, 2023
11	Mohamad Yusuf Permana	Commissioner	Otoritas Jasa Keuangan	Pass	September 2, 2024

DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS [ACGS D.1.3]

In carrying out its supervisory function over the management policies and the general course of management of the Bank and its business activities undertaken by the Board of Directors, the Board of Commissioners acts and is collectively responsible with the assistance of supporting organs below it, such as the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, and Integrated Governance Committee, according to their respective fields. In addition to fulfilling its supervisory role, the Board of Commissioners also plays an advisory role to the Board of Directors, including monitoring the implementation of the Company's Long-Term Plan, the Company's Work Plan and Budget, and ensuring the Bank's compliance with applicable laws and regulations, in order to achieve the Bank's interests in accordance with the Bank's objectives and goals.

Based on Law No. 40 of 2007 regarding Limited Liability Companies, as amended by Law No. 6 of 2023 on the Ratification of the Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law, as further amended by Law No. 11 of 2020 on Job Creation, and the Articles of Association of BNI, the Board of Commissioners is obligated to:

1) Comply with the Articles of Association and applicable laws and regulations, as well as principles of professionalism, efficiency, transparency, independence, accountability, responsibility, fairness, and equality;
2) Act in good faith, with caution, and responsibly in carrying out its supervisory and advisory duties to the Board of Directors for the benefit of the Company and in accordance with the Company's objectives and goals.

Meanwhile, to maintain objectivity and independence in carrying out its supervisory functions and duties, the Board of Commissioners is prohibited from being involved in decision-making related to the Bank's operational activities, except in relation to:

1) The provision of funds to related parties as regulated by the provisions regarding the maximum limits of credit extension by commercial banks; and
2) Other matters as regulated in the Bank's Articles of Association or applicable laws and regulations.

The decision-making in the Bank's operational activities by the Board of Commissioners as mentioned above is part of the supervisory duties of the Board of Commissioners but does not absolve the Board of Directors from responsibility for managing the Bank.

Duties and Responsibilities of the President Commissioner [ACGS D.4.4]

The President Commissioner of BNI has the following duties and responsibilities:

1) Coordinate the implementation of the Board of Commissioners' tasks;
2) Lead meetings of the Board of Commissioners;
3) Sign written documents, including correspondence with another Commissioner;
4) Represent the Board of Commissioners in attending meetings and events organized by the authorities, Series A Dwiwarna shareholders, and other agencies; and
5) Represent the Board of Commissioners in leading the General Meeting of Shareholders of the Company.

Delegation of Duties to Members of the Board of Commissioners [ACGS D.1.3]

Considering the diversity within the Board of Commissioners in terms of expertise and professional experience, the Bank has clearly defined the delegation of duties to each member of the Board of Commissioners, both as chairpersons or members of the committees formed by the Board of Commissioners to assist in the implementation of its supervisory duties collectively. The delegation of duties to each member of the Board of Commissioners of BNI is as follows:

January 1, 2024 – Mach 4, 2024 [ACGS D.1.3]

No.	Name	Position	Period	Committee Membership by the Board of Commissioners Members
1	Pradjoto	President Commissioner/ Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman
2	Pahala Nugraha Mansury	Vice President Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
3	Sigit Widyawan	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Audit Committee Member

No.	Name	Position	Period	Committee Membership by the Board of Commissioners Members
4	Askolani	Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
5	Asmawi Syam	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Audit Committee Chairman • Nomination and Remuneration Committee Member
6	Septian Hario Seto	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
7	Iman Sugema	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Audit Committee Member
8	Erwin Rijanto Slamet	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Risk Monitoring Committee Chairman • Nomination and Remuneration Committee Member
9	Fadlansyah Lubis	Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
10	Robertus Billitea	Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
11	Susyanto[1)]	Commissioner	• January 1, 2024 – March 4, 2024 • January 1, 2024 –March 4, 2024	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member

[1)] Ceased to serve as Commissioner since March 4, 2024

In 2024, there has been a change in the composition of the Bank's Board of Commissioners as decided in the 2024 AGMS. Thus, the division of duties and responsibilities of members of the BNI Board of Commissioners has been adjusted in accordance with the needs and development of the Bank to be as follows:

March 4, 2024 – December 31, 2024 [ACGS D.1.3]

No.	Name	Position	Period	Committee Membership by the Board of Commissioners Members
1	Pradjoto	President Commissioner/ Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman
2	Pahala Nugraha Mansury	Vice President Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
3	Sigit Widyawan	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Audit Committee Member
4	Askolani	Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Integrated Governance Member
5	Asmawi Syam	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Audit Committee Chairman • Nomination and Remuneration Committee Member
6	Septian Hario Seto	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Member of Risk Monitoring Committee
7	Iman Sugema	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Audit Committee Member

No.	Name	Position	Period	Committee Membership by the Board of Commissioners Members
8	Erwin Rijanto Slamet	Independent Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Risk Monitoring Committee Chairman • Nomination and Remuneration Committee Member
9	Fadlansyah Lubis	Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
10	Robertus Billitea	Commissioner	• January 1, 2024 – December 31, 2024 • January 1, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
11	Mohamad Yusuf Permana[1)]	Commissioner	• October 22, 2024 – December 31, 2024 • October 22, 2024 – December 31, 2024	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member

[1)] Served as Commissioner since March 4, 2024 and effective based on OJK approval since September 2, 2024

AUTHORITY OF THE BOARD OF COMMISSIONERS

As stipulated in the Articles of Association, the Bank delegates authority to the Board of Commissioners to:

1. Examine books, letters, and other documents, verify cash, review other securities, and inspect the Company's assets;
2. Enter the premises, buildings, and offices used by the Company;
3. Request explanations from the Board of Directors and/or other officials regarding any matters related to the management of the Company;
4. Be informed of all policies and actions that have been and will be carried out by the Board of Directors;
5. Request the attendance of the Board of Directors and/or other officials under the Board of Directors, with the knowledge of the Board of Directors, at Board of Commissioners' meetings;
6. Appoint and dismiss a Secretary to the Board of Commissioners;
7. Temporarily dismiss members of the Board of Directors in accordance with the provisions of the Articles of Association;
8. Establish the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, Integrated Governance Committee, and other committees as deemed necessary, considering the Company's capabilities;
9. Engage experts for specific matters and for a certain period at the Company's expense, if deemed necessary;
10. Undertake Company management actions under certain circumstances and for a specified period, in accordance with the provisions of the Articles of Association;
11. Approve the appointment and dismissal of the Corporate Secretary and/or Head of the Internal Audit Unit;
12. Attend Board of Directors' meetings and provide views on matters being discussed; and
13. Exercise other supervisory authorities as long as they do not conflict with laws and regulations, the Articles of Association, and/or resolutions of the General Meeting of Shareholders (GMS).

DUTIES OF THE BOARD OF COMMISSIONERS

Meanwhile, the duties of the Board of Commissioners based on BNI's Board of Commissioners Charter are as follows:

1. Provide advice to the Board of Directors in managing the Company;
2. Provide opinions and approvals on the Company's Work Plan and Annual Budget as well as other work plans prepared by the Board of Directors, in accordance with the provisions of the Articles of Association;
3. Monitor the Company's activities, providing opinions and suggestions to the General Meeting of Shareholders (GMS) on any matters deemed important for the Company's management;
4. Report to the Series A Dwiwarna Shareholder in the event of indications of declining Company performance;
5. Propose to the GMS the appointment of a Public Accountant and/or Public Accounting Firm to audit the Company's books;
6. Review and examine periodic reports and annual reports prepared by the Board of Directors and sign the annual report;
7. Provide explanations, opinions, and suggestions to the GMS regarding the Annual Report, if requested;
8. Prepare minutes of the Board of Commissioners' meetings and retain one copy;
9. Report to the Company regarding their share ownership and/or that of their family in the Company and other companies;

10. Submit a report on supervisory duties carried out during the past fiscal year to the GMS;
11. Provide explanations on any matters requested by the Series A Dwiwarna Shareholder, taking into account laws and regulations, particularly those in the Capital Market and Banking sectors;
12. Direct, monitor, and evaluate the implementation of integrated governance, risk management, compliance, and strategic policies of the Company in accordance with laws, the Articles of Association, and/or GMS resolutions;
13. Formulate the Board of Commissioners Charter and the Governance Framework between the Company's Board of Commissioners and the Boards of Commissioners of Subsidiaries, considering regulations, especially in the Banking and Capital Market sectors;
14. Perform other duties related to supervisory and advisory roles, provided they do not conflict with laws, the Articles of Association, and/or GMS resolutions;
15. Approve strategic matters in accordance with the Articles of Association;
16. Report to the Financial Services Authority (OJK) no later than five (5) days after discovering:
    (1) Violation of the provisions of laws and regulations in the fields of finance, banking, and those related to the Bank's business activities; and/or
    (2) Conditions or potential conditions that could endanger the Company's business continuity
17. Safeguard all data and information related to the Bank provided by the Board of Directors, in accordance with applicable laws;
18. Provide written approval for legal actions undertaken by the Board of Directors as required by BNI's Articles of Association, taking into account laws and regulations in the Capital Market and Banking sectors:
    a. Release/transfer and/or pledge the Company's assets with criteria and values exceeding a certain amount determined by the Board of Commissioners, except for the Company's assets in the context of implementing the Company's business activities in accordance with applicable laws and regulations, which include assets in the form of credit, securities, collateral taken over, movable goods, and other assets obtained in the context of the Company's business activities by taking into account provisions in the capital market and banking sectors;
    b. Writing off fixed assets under certain conditions:
        (1) Lost;
        (2) Destroyed;
        (3) Irreparably damaged or non-transferable (total loss);
        (4) Disposal costs exceeding the economic value obtained from the disposal;
        (5) Demolished for reconstruction or conversion into other fixed assets as budgeted by the GMS/Minister through the approval of the Company's Work Plan and Budget (RKAP);
        (6) Demolished without reconstruction due to alternative programs outlined in the RKAP;
        (7) Demolished for government projects; and/or
        (8) Based on laws and/or legally binding court decisions, the fixed asset is no longer owned or controlled by the State-Owned Enterprise (SOE).
    c. Cooperating with business entities or other parties, in the form of Joint Operations (KSO), Business Cooperation (KSU), License Cooperation, Build Operate and Transfer (BOT), Build, Transfer and Operate (BTO), Build Operate and Own (BOO), and other agreements of the same nature with a term or value exceeding that determined by the Board of Commissioners;
    d. Determining and changing the Company's logo;
    e. Determining the organizational structure 1 (one) level below the Board of Directors;
    f. Making capital participation, releasing capital participation including changes to the capital structure with a certain value determined by the Board of Commissioners in other Companies, subsidiaries, and joint ventures that are not in the context of rescuing receivables by considering the provisions in the Capital Market and Banking sectors;
    g. Establishing subsidiaries and/or joint ventures with a certain value determined by the Board of Commissioners by considering the provisions in the Capital Market and Banking sectors;
    h. Propose representatives of the Company to become candidates for Members of the Board of Directors and Board of Commissioners in subsidiaries that provide significant contributions to the Company and/or have strategic value as determined by the Board of Commissioners;
    i. Conduct mergers, amalgamations, acquisitions, separations, and dissolutions of subsidiaries and joint ventures with a certain value determined by the Board of Commissioners by taking into account provisions in the Capital Market and Banking sector;
    j. Conduct actions included in material transactions as stipulated by laws and regulations in the capital market sector with a certain value determined by the Board of Commissioners, unless such actions are included in material transactions that

are excluded by the applicable Laws and Regulations in the Capital Market and Banking sector;

k. Actions that have not been stipulated in the RKAP;

l. The act of transferring including selling, releasing the right to collect and/or no longer collecting:
   (1) Bad principal receivables that have been written off in order to settle credit, either in part or in whole; and
   (2) The difference between the value of bad principal receivables that have been written off and the transfer value including sale or with the value of the release of rights;
   is carried out based on the policy of the Board of Directors that has been approved by the Board of Commissioners and within the amount of the write-off ceiling (limit) that has been determined by the GMS which will remain in effect until a new ceiling (limit) is determined by the GMS.

The approval of the Board of Commissioners concerning points a, c, f, g, h, and i above, with certain limitations and/or criteria, is determined in accordance with the limitations and/or criteria that have received approval from the Series A Dwiwarna Shareholder. The determination of such limitations and/or criteria by the Board of Commissioners for matters as referred to in points a, c, f, g, h, and i above has also been established by the Board of Commissioners in accordance with the specific limitations and/or criteria that have received approval from the Series A Dwiwarna Shareholder, as outlined in the Board of Commissioners' Decree.

POLICY ON CONCURRENT POSITIONS OF THE BOARD OF COMMISSIONERS [ACGS D.2.6, D.2.7]

Referring to BNI's Board of Commissioners Charter and as stipulated in the Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 on the Organs and Human Resources of State-Owned Enterprises, each member of BNI's Board of Commissioners is permitted to hold concurrent positions as a member of the Board of Commissioners in other business entities, provided it complies with sectoral laws and regulations. Furthermore, in accordance with the Financial Services Authority Regulation (OJK) No. 17 of 2023 concerning Governance Implementation for Commercial Banks, all members of the Bank's Board of Commissioners are prohibited from holding concurrent positions as:

1. A member of the Board of Directors, Board of Commissioners, Sharia Supervisory Board, or Executive Officer in financial institutions or financial companies, whether banking or non-banking;
2. A member of the Board of Directors, Board of Commissioners, Sharia Supervisory Board, or Executive Officer in more than one (1) non-financial institution or company, whether domiciled domestically or abroad;
3. A functional position in banking financial institutions and/or non-banking financial institutions, whether domiciled domestically or abroad;
4. Any other position that may cause a conflict of interest in the performance of duties as a member of the Board of Commissioners; and/or
5. Any other position as stipulated by prevailing laws and regulations.

However, the concurrent positions as referred to above do not include the following:

1. Members of the Board of Commissioners serving as members of the Board of Directors, members of the Board of Commissioners, or executive officers performing supervisory functions in one (1) non-bank subsidiary controlled by the Bank;
2. Non-Independent Commissioners carrying out functional duties on behalf of the Bank's shareholders in the form of legal entities within the Bank and/or the Bank's business group; and/or
3. Members of the Board of Commissioners holding positions in non-profit organizations or institutions, provided that such roles do not cause them to neglect their duties and responsibilities as members of the Board of Commissioners.

POLICY ON CONCURRENT POSITIONS FOR THE BOARD OF COMMISSIONERS, INCLUDING INDEPENDENT COMMISSIONERS [ACGS E.2.6]

To ensure the implementation of Good Corporate Governance principles in carrying out its duties and functions, the Board of Commissioners has established a policy prohibiting concurrent positions for its members. This policy is further regulated in the Board of Commissioners Charter pursuant to the Board of Commissioners Decree No. KEP/024/DK/2024 dated September 10, 2024. Additionally, the prohibition of concurrent positions for the Board of Commissioners is stipulated in BNI's GCG Guidelines, which specify that members of the Board of Commissioners are prohibited from holding concurrent positions as:

a. Members of the Board of Directors, members of the Board of Commissioners/Supervisory Board, or Executive Officers in financial institutions or financial companies, both banking and non-banking;
b. Members of the Board of Directors, members of the Board of Commissioners, or Executive Officers in more than one (1) non-financial institution or company, whether publicly listed or non-listed, domiciled domestically or abroad;
c. Holding functional roles in banking financial institutions and/or non-banking financial institutions domiciled domestically or abroad;
d. Administrators of political parties and/or candidates/members of the House of Representatives (DPR), Regional Representative Council (DPD), Provincial Regional House of Representatives (DPRD), and Regency/Municipal Regional House of Representatives;
e. Candidates for regional heads/deputy regional heads and/or regional heads/deputy regional heads, including acting regional heads/deputy regional heads;
f. Other positions that may create conflicts of interest in performing duties as members of the Board of Commissioners; and/or
g. Other positions as stipulated by applicable laws and regulations.

Information regarding the concurrent positions of the Bank's Board of Commissioners as of December 31, 2024, is outlined as follows:

Name	Position at the Bank	Member of the Board of Directors of State Owned Enterprises, Regional Owned Enterprises, Private Owned Enterprises	Management Board of Political Parties and/or Candidates/ Member of DPR, DPD, DPRD Level I, and DPRD Level II and/or Candidates for Regional Head/ Deputy Regional Head	Other Positions in Accordance with the Provisions of Laws and Regulations	Other Positions that Can Cause a Conflict of Interest	Position in a Subsidiary
Pradjoto	President Commissioner/ Independent Commissioner	No	No	No	No	No
Pahala Nugraha Mansury	Vice President Commissioner	No	No	No	No	No
Sigit Widyawan	Independent Commissioner	No	No	No	No	No
Askolani	Commissioner	No	No	No	No	No
Asmawi Syam	Independent Commissioner	No	No	No	No	No
Septian Hario Seto	Independent Commissioner	No	No	No	No	No
Iman Sugema	Independent Commissioner	No	No	No	No	No
Erwin Rijanto Slamet	Independent Commissioner	No	No	No	No	No
Fadlansyah Lubis	Commissioner	No	No	No	No	No
Robertus Billitea	Commissioner	No	No	No	No	No
Mohamad Yusuf Permana	Commissioner	No	No	No	No	No

MANAGEMENT OF CONFLICT OF INTEREST FOR THE BOARD OF COMMISSIONERS [ACGS A.8.2]

The policy for managing conflicts of interest within the Bank's Board of Commissioners is clearly outlined in the Conflict of Interest Handling Guidelines No. IN/119/CMP/001 dated December 27, 2024. In these guidelines, the Bank encourages all members of the Board of Commissioners to avoid situations that may potentially create conflicts of interest between personal interests and the interests of the Bank. In the event of a conflict of interest, the Board of Commissioners is prohibited from taking actions that could harm or reduce the Bank's benefits and is required to disclose any potential conflicts of interest in every decision-making process. To prevent activities that may lead to conflicts of interest, each member of the Board of Commissioners must always:

1) Prioritize the interests of the Company and avoid actions that may compromise the Company's financial standing in the event of a conflict of interest;
2) Refrain from participating in decision-making processes in situations where conflicts of interest exist;
3) Disclose any familial, financial, managerial, or ownership relationships with other members of the Board of Commissioners and/or members of the Board of Directors and/or the Bank's controlling shareholders and/or other parties related to the Company's business activities; and
4) Make the necessary disclosures if decisions must still be made under circumstances involving a conflict of interest.

PARTICIPATION OF THE BOARD OF COMMISSIONERS IN ASSOCIATIONS AND/OR PROFESSIONAL ORGANIZATIONS

Several members of BNI's Board of Commissioners are registered as active members in various associations or professional organizations. The active participation of Board members in such associations or organizations does not interfere with the fulfillment of their duties and responsibilities as members of the Bank's Board of Commissioners, and as such, it is not categorized as holding concurrent positions.

No.	Name	Position	Position at the Association/Organization
1	Pradjoto	President Commissioner/ Independent Commissioner	• Member of the Association of Capital Market Legal Consultants (HKHPM) • Indonesian Advocates Association Member (Peradi) • Chairman of the Banking Business Ethics Supervisory Board of the National Bank Association (PERBANAS) • Code of Ethics Board of the Risk Management Certification Board (BSMR) • Member of the Supervisory Board of the Indonesian Bankers Association (IBI) • Member of Advisory Board of Bankers Association for Risk Management (BARa)
2	Pahala Nugraha Mansury	Vice President Commissioner	Member of the Supervisory Board of the National Bank Association (Perbanas)
3	Sigit Widyawan	Independent Commissioner	-
4	Askolani	Commissioner	-
5	Asmawi Syam	Independent Commissioner	-
6	Septian Hario Seto	Independent Commissioner	-
7	Iman Sugema	Independent Commissioner	-
8	Erwin Rijanto Slamet	Independent Commissioner	-
9	Fadlansyah Lubis	Commissioner	-
10	Robertus Billitea	Commissioner	Indonesian Advocates Association Member (Peradi)
11	Mohamad Yusuf Permana	Commissioner	-

LOAN POLICY FOR THE BOARD OF COMMISSIONERS [ACGS A.8.3]

BNI does not prohibit and has established a loan policy for the Board of Commissioners, which is implemented in accordance with BNI's prevailing credit policies, guided by applicable regulations, and subject to the same terms and conditions as loans granted to non-affiliated parties. The loan policy for the Board of Commissioners is applied based on the principles of an arm's length basis and at market rates, as stipulated in the Corporate Guidelines for Business and Consumer Banking Credit.

Independence of the Board of Commissioners

All members of BNI's Board of Commissioners consistently perform their duties and responsibilities independently from management to ensure the effective execution of their functions. Accordingly, at least 50% (fifty percent) of the total members of the Board of Commissioners are Independent Commissioners, which is in line with the Bank's Governance Policy. The involvement of independent parties within the Board of Commissioners in every decision-making process is believed to help ensure that governance bodies are not influenced by conditions that may give rise to conflicts of interest, thereby enabling decisions to be made in the strategic interests of shareholders and the Bank.

At the beginning of each year, every member of the Board of Commissioners signs an independence declaration to affirm their independent status. Additionally, the Board of Commissioners reconfirms whether any situations involving conflicts of interest with the Bank occurred in the past year related to their actions. If there is any change in status that affects the independence of a Board member during their term of office including changes in personal or family share ownership in BNI or in other banks, non-bank financial institutions, or companies, the concerned Board member is required to report and disclose such conflicts of interest to the Bank.

Share Ownership of the Board of Commissioners [ACGS C.1.3]

All members of the Bank's Board of Commissioners have disclosed their share ownership transparently, both in BNI and in other banks or companies. The share ownership of each member of the Board of Commissioners is presented in the table below:

Share Ownership of the Board of Commissioners as of December 31, 2024

Name	Position	Share Ownership	
		BNI	Other Bank or Company
Pradjoto	President Commissioner/ Independent Commissioner	None	None
Pahala Nugraha Mansury	Vice President Commissioner	677,291 shares (0.0018159%)	None
Sigit Widyawan	Independent Commissioner	None	None
Askolani	Commissioner	1,752,462 shares (0.0046986%)	None
Asmawi Syam	Independent Commissioner	None	None
Septian Hario Seto	Independent Commissioner	None	None
Iman Sugema	Independent Commissioner	None	None
Erwin Rijanto Slamet	Independent Commissioner	None	None
Fadlansyah Lubis	Commissioner	986,860 shares (0.0026459%)	None
Robertus Billitea	Commissioner	864,066 shares (0.0023167%)	None
Mohamad Yusuf Permana	Commissioner	None	None

Board of Commissioners Meetings

Policies and Implementation of Board of Commissioners Meetings

Based on the Decree of the Board of Commissioners No. KEP/024/DK/2024, dated October 22, 2024, concerning the Charter of the Board of Commissioners, further elaborated in the Decree of the Board of Commissioners No. KEP/025/DK/2024 dated October 22, 2024, regarding the Rules of Procedure for the Board of Commissioners Meetings and Joint Meetings of the Board of Commissioners and the Board of Directors of PT Bank Negara Indonesia (Persero)Tbk, the Board of Commissioners has established procedures and mechanisms for conducting meetings. These provisions primarily cover the following aspects:

1. Schedule of Meetings;
2. Meeting Agenda;
3. Meeting Venue;
4. Meeting Participants;
5. Proxies and Representation;
6. Meeting Notifications;
7. Attendance and Decision-Making Process;
8. Documentation and Administrative Management of Meeting Minutes;
9. Meeting Confidentiality;
10. Board of Commissioners' Resolutions Outside of Meetings;
11. Board of Commissioners Meetings via Teleconference Media; and
12. Format and Presentation Materials for Meetings.

As stipulated in the Procedures and Mechanisms for Board of Commissioners Meetings, the Bank categorizes meetings into the following types:

1) Board of Commissioners Meetings (Rakom), Including Internal Meetings of the Board of Commissioners;
2) Board of Commissioners Meetings with Invitees Directors of specific Divisions/Sectors or Senior Executive Vice Presidents (SEVP);
3) Joint Meetings of the Board of Directors and Board of Commissioners (Radikom), attended by both Boards along with the Corporate Secretary and the Secretary to the Board of Commissioners.

In general, the implementation of the Board of Commissioners Meetings is conducted in accordance with the provisions of the Financial Services Authority Regulation (POJK) No. 33/POJK.04/2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Public Companies, as well as with reference to the BNI Board of Commissioners Charter:

Meeting Organization	1) All decisions of the Board of Commissioners are taken in a Board of Commissioners meeting. 2) The Board of Commissioners must hold a periodic Board of Commissioners Meeting at least 1 (one) time every 2 (two) months. 3) The Board of Commissioners must hold a Board of Commissioners Meeting with the Board of Directors periodically at least 1 (one) time every 4 (four) months. 4) The Board of Commissioners Meeting as referred to in points 2 and 3 is held if attended by the majority of members of the Board of Commissioners. 5) The Board of Commissioners must determine the rules of procedure for the Board of Commissioners meeting. 6) The Board of Commissioners may hold a meeting at any time at the request of 1 (one) or several members of the Board of Commissioners or the Board of Directors, stating the matters to be discussed. 7) The Board of Commissioners may also make valid decisions without holding a Board of Commissioners Meeting provided that all members of the Board of Commissioners have been notified in writing and all members of the Board of Commissioners give their approval regarding the proposal submitted in writing and sign the approval. Decisions taken in this manner have the same force as decisions taken validly in a Board of Commissioners Meeting. 8) In the event that a member of the Board of Commissioners is unable to attend the Meeting physically, then the member of the Board of Commissioners may attend the Meeting of the Board of Commissioners face-to-face by utilizing information technology. 9) Every member of the Board of Commissioners who personally in any way, either directly or indirectly, has an interest in a transaction, contract or proposed contract in which the Company is a party, must declare the nature of his/her interest in a Meeting of the Board of Commissioners and shall not be entitled to participate in voting on matters relating to the transaction or contract
Meeting Summons	1) The summons for the Board of Commissioners Meeting must be made by the President Commissioner, in the event that the President Commissioner is unable to attend, the summons for the Meeting must be made by the Deputy President Commissioner. However, in the event that the Deputy President Commissioner is unable to attend for any reason, the summons for the Meeting must be made by one of the members of the Board of Commissioners. 2) The summons for the Board of Commissioners Meeting must be made in writing and delivered or submitted directly to each member of the Board of Commissioners with adequate receipt or by registered mail or by courier service or by telex, facsimile, or electronic mail (e-mail) no later than 5 (five) working days before the meeting is held, excluding the date of the summons and the date of the meeting or in a shorter time if in urgent circumstances. [ACGS D.3.6, E.3.6] 3) The summons for the Board of Commissioners Meeting must include the agenda, date, time, and place of the meeting. The Board of Commissioners Meeting is held at the Company's domicile or at another place within the territory of the Republic of Indonesia or at the Company's place of business activities. 4) The materials for the Board of Commissioners Meeting shall be distributed to all meeting participants no later than 5 (five) working days before the meeting is held, unless the meeting is held outside the schedule, the meeting materials may be delivered before the meeting is held. 5) The summons as mentioned above is not required for meetings that have been scheduled based on the decision of the Board of Commissioners Meeting held previously.
Attendance and Chairmanship of Board of Commissioners Meetings	1) The Board of Commissioners Meeting is led by the President Commissioner, if the President Commissioner is absent or prevented, then the Deputy President Commissioner who leads the Meeting of the President Commissioner or a member of the Board of Commissioners appointed in writing by the President Commissioner who leads the Meeting if at the same time the Deputy President Commissioner is absent or prevented, or a member of the Board of Commissioners appointed by the Deputy President Commissioner who leads the Meeting of the Board of Commissioners if at the same time the President Commissioner is absent or prevented and does not make an appointment. 2) In the event that the Deputy President Commissioner does not make an appointment, then one of the Board of Commissioners who has served the longest as a member of the Board of Commissioners acts as the Chair of the Board of Commissioners Meeting. 3) In the event that the member of the Board of Commissioners who has served the longest as a member of the Company's Board of Commissioners is more than 1 (one) person, then the member of the Board of Commissioners as referred to in number 2 above who is the oldest in age acts as the Chair of the Board of Commissioners Meeting. 4) The implementation of the Board of Commissioners Meeting must be attended by all members of the Board of Commissioners physically at least 2 (two) times in 1 (one) year.

Quorum and Decision Making [ACGS D.3.4]	1) The Board of Commissioners Meeting is valid and has the right to make binding decisions if attended and/or represented by more than 1/2 (one half) of the total number of members of the Board of Commissioners. 2) In the event that there is more than one proposal, a re-election shall be held so that one of the proposals obtains more than 1/2 (one half) of the total number of votes cast. [ACGS E.3.4] 3) In the Board of Commissioners Meeting, each member of the Board of Commissioners has the right to cast 1 (one) vote and an additional 1 (one) vote for each other member of the Board of Commissioners legally represented at the meeting. 4) Blank votes (abstain) are considered to agree to the proposal submitted at the meeting. Invalid votes are considered non-existent and are not counted in determining the number of votes cast at the meeting. 5) Voting regarding a person is carried out using a closed ballot without a signature, while voting regarding other matters is carried out verbally, unless the Chairperson of the Meeting determines otherwise without any objection based on the majority of votes from those present. 6) Decisions of the Board of Commissioners Meeting must be taken based on deliberation to reach consensus. If a decision based on deliberation for consensus is not reached, then the decision must be taken by voting based on the affirmative votes of more than 1⁄2 (one half) of the total valid votes cast at the relevant meeting. 7) All decisions of the Board of Commissioners are binding on all members of the Board of Commissioners.
Minutes of Meeting	1) The results of the Board of Commissioners Meeting must be stated in the Minutes of Meeting. The Minutes of Meeting must be made by a person present at the meeting appointed by the Chairperson of the Meeting and then signed by all members of the Board of Commissioners present and submitted to all members of the Board of Commissioners. 2) The results of the Board of Commissioners Meeting with the Board of Directors must be stated in the Minutes of Meeting. The Minutes of Meeting must be made by a person present at the meeting appointed by the Chairperson of the Meeting and then signed by all members of the Board of Commissioners and members of the Board of Directors present and submitted to all members of the Board of Commissioners and members of the Board of Directors. 3) The Minutes of Meeting as referred to in points 1 and number 2 above contain the matters discussed including dissenting opinions that occur along with the reasons for the differences of opinion, if any, and the matters decided. 4) In the event that there are members of the Board of Commissioners and/or members of the Board of Directors who do not sign the results of the meeting as referred to in points 1 and 2 above, the person concerned must state the reasons in writing in a separate letter attached to the Minutes of Meeting. 5) The Minutes of Meeting as referred to in points 1 and number 2 above must be documented by the Company. 6) Minutes of the Board of Commissioners Meeting are valid evidence for members of the Board of Commissioners and for third parties regarding the decisions taken at the relevant Meeting.
Decision Outside the Board of Commissioners Meeting	The Board of Commissioners may also adopt valid decisions without convening a Board of Commissioners meeting, provided that all members of the Board of Commissioners have been notified in writing and all members have given their written approval of the proposed resolution and signed the said approval. Decisions made in this manner shall have the same legal force as decisions validly made in a Board of Commissioners meeting.

Attendance of the Board of Commissioners in Board of Commissioners Meetings, Joint Meetings with the Board of Directors, and General Meeting of Shareholders (GMS) [ACGS D.3.2, D.3.3]

In 2024, the Board of Commissioners held a total of 53 (fifty-three) Board of Commissioners Meetings, including 7 (seven) Joint Meetings with the Board of Directors and 1 (one) General Meeting of Shareholders (GMS). The following table presents the frequency and attendance of each member of the Board of Commissioners:

Name	Position	Board of Commissioners Meetings [ACGS D.3.5]			BOC-BOD Meetings			Annual GMS for Fiscal Year 2023		
		Total and (%) Attendance			Total and (%) Attendance			Total and (%) Attendance		
		Total Meeting	Attendance	%	Total Meeting	Attendance	%	Total Meeting	Attendance	%
Pradjoto [1)]	President Commissioner/ Independent Commissioner	53	53	100	7	7	100	1	1	100
Pahala Nugraha Mansury [2)]	Vice President Commissioner	45	38	84	5	4	80	1	1	100

Name	Position	Board of Commissioners Meetings [ACGS D.3.5]			BOC-BOD Meetings			Annual GMS for Fiscal Year 2023		
		Total and (%) Attendance			Total and (%) Attendance			Total and (%) Attendance		
		Total Meeting	Attendance	%	Total Meeting	Attendance	%	Total Meeting	Attendance	%
Sigit Widyawan	Independent Commissioner	53	53	100	7	7	100	1	1	100
Susyanto[3)]	Commissioner	13	13	100	2	2	100	1	1	100
Askolani	Commissioner	53	48	91	7	6	86	1	1	100
Fadlansyah Lubis	Commissioner	53	53	100	7	7	100	1	1	100
Asmawi Syam	Independent Commissioner	53	53	100	7	7	100	1	1	100
Iman Sugema	Independent Commissioner	53	52	98	7	7	100	1	1	100
Mohamad Yusuf Permana [4)]	Commissioner	17	15	88	2	2	100	-	-	-
Septian Hario Seto	Independent Commissioner	53	51	96	7	7	100	1	1	100
Erwin Rijanto Slamet	Independent Commissioner	53	52	98	7	7	100	1	1	100
Robertus Billitea	Commissioner	53	43	81	7	6	86	1	1	100

1) Effectively changed his position from Vice President Commissioner to President Commissioner based on OJK approval since February 19, 2024.
2) Effective as Vice President Commissioner based on OJK approval since February 19, 2024
3) Ceased to serve as Commissioner since March 4, 2024
4) Served as Commissioner since March 4, 2024 and effective based on OJK approval since September 2, 20244

Throughout 2024, the Board of Commissioners held a total of 53 (fifty-three) Board of Commissioners Meetings, including 7 (seven) Joint Meetings with the Board of Directors, with an average attendance rate of 95%.

Agenda, Dates, and Participants of the Board of Commissioners Meetings in 2024 [ACGS D.3.5]

Throughout 2024, the Board of Commissioners conducted 53 (fifty-three) meetings, with details of the agenda, dates, and participants as follows:

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
1.	January 4, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
2.	January 11, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Discussion of Proposed Schedule and Agenda of BNI Annual GMS for Fiscal Year 2023 2. Appointment of Independent Consultant for the Board of Directors and the Board of Commissioners Remuneration 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
3.	January 18, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. Audit Closing Meeting for 2023 Fiscal Year 2. BNI Health Level (Bank Only) as of December 31, 2023	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
4	January 25, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Financial Performance as of December 31, 2023 2. Supervision of BNI DPLK Business Plan Realization for Semester II/2023	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
5.	January 31, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
6.	February 7, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. DPLK BNI Health Level in 2023	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
7.	February 13, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Talent Development Policy 2. Board of Commissioners Development Program 2024 3. Outsourcing Labor Management Policies and Procedures	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Online
8.	February 15, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Internal Audit Review 2. Determination of HPS for Procurement of General Audit Services for Financial Year 2024 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
9.	February 20, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Review of Board of Directors and Board of Commissioners Remuneration in 2024 2. Realization of KPIs for the Board of Directors in 2023 3. KPI Target for Directors in 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
10.	February 21, 2024	**Board of Commissioners meeting invites the relevant Director** One-on-One Interview of the Board of Directors	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
11.	February 22, 2024	**Board of Commissioners meeting invites the relevant Director** 1. One-on-One Interview with the Board of Directors 2. Determination of Public Accountant Firm (KAP) for Financial Year 2024 3. Proposed Resolution of BNI Annual GMS 2023 4. Discussion on the achievement of Long Term Incentives performance targets.	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
12.	February 27, 2024	**Board of Commissioners meeting invites the relevant Director** 1. BNI Talent Interview 2. Rehearsal of BNI 2023 Annual GMS	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
13.	February 29, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Approval of Internal Audit Head Replacement 3. Change of Subsidiary Company Management	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
14.	March 14, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Change of Subsidiary Company Management	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
15.	March 21, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Overseas Office Performance for 2024 Period Internal Meeting of the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
16.	March 28, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Corporate Plan (as a continuation of Corporate Transformation) 3. Sanctioning Policy and Implementation	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
17.	April 02, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present 7. Absent 8. Present 9. Present 10. Present 11. Absent	Online
18.	April 04, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Proposed Remuneration of the Board of Directors and Board of Commissioners for 2024 2. Approval of BNI's Risk Appetite Statement for the year 2024 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
19.	April 18, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Appointment of Consultant for Internal Audit Function Review Year 2024 2. Audit and Consulting Plan for 2024 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
20.	April 25, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Financial Performance as of March 31, 2024 2. BNI Individual Risk Profile as of March 31, 2024 3. DPLK BNI Governance 2023 4. BNI Payment Service Provider Report 2023 5. Determination of Management of Subsidiary Company	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
21.	May 02, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
22.	May 03, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Outsourcing Policy 2. Changes in Pension Fund Regulations	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Absent 11. Present	Online
23.	May 16, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Organizational Arrangement of the Board of Directors 2. Changes in Allowances and Facilities for members of the Board of Directors and Board of Commissioners 3. Credit Consultation to the Board of Commissioners Internal Meeting of the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
24.	May 12, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Absent 11. Present	Online
25.	May 30, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Consultation on Loan Write-off to the Board of Commissioners 2. Credit Consultation to the Board of Commissioners 3. Approval of Good Corporate Governance (GCG) Policy Year 2024 4. Approval of Compliance Charter Year 2024 5. Employee Remuneration	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
26.	June 06, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Evaluation of Internal Control System and Effectiveness of Internal Audit Task Implementation 2. Implementation of DPLK BNI Risk Management for Semester II/2023 3. Approval of DPLK BNI Risk Appetite Statement for 2024 Internal Meeting of the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
27.	June 13, 2024	**Board of Commissioners meeting invites the relevant Director** Changes in Management of Subsidiary Companies	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Online
28.	June 20, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. Revision of BNI RBB 2024-2026 2. Credit Consultation to the Board of Commissioners 3. Clear Book Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
29.	June 27, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Consultation on Loan Write-off to the Board of Commissioners 2. Realization of Loans consulted to the Board of Commissioners Period 2023 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
30.	July 04, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Follow-up Consultation on Loan Write-off to the Board of Commissioners 2. Approval of Review of General Policy on Internal Control System	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Absent 9. Present 10. Absent 11. Present	Hybrid
31.	July 11, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. BNI Operational Risk Management Framework	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
32.	July 18, 2024	**Board of Commissioners meeting invites the relevant Director** 1. BNI Health Level position June 30, 2024 2. Performance targets related to Long Term Incentives (LTI) and discussion on LTI governance.	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
33.	July 25, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Supervision of DPLK BNI Business Plan Realization Semester I/2024 2. Implementation of APU PPT and PPPSPM Program of DPLK BNI Quarter II/2024 3. Implementation of Risk Management of DPLK BNI Semester I/2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
34.	August 08, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Approval of BNI Internal Audit Charter Updating 2. Evaluation of the Implementation of Consumer and Public Protection in the Financial Services Sector at BNI 3. Evaluation of Achievement of Macroprudential Inclusive Financing Ratio (RPIM) and RPIM Development Strategy	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
35.	August 15, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance, Subsidiaries, and RBB Realization for the Second Quarter/2024 Period 2. Board of Directors Collegial KPI for 2024 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
36.	August 29, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. BNI Capital Participation Plan 3. Internal Audit Function Review Result	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
37.	September 12, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Absent 11. Present	Hybrid
38.	September 24, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Risk Maturity Index (RMI) Assessment Results 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
39.	September 26, 2024	**Board of Commissioners meeting invites the relevant Director** 1. KPI of the Board of Directors for Semester I/2024 2. Credit Consultation to the Board of Commissioners 3. Consultation on Loan Write-off to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Absent 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
40.	October 10, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
41.	October 17, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance, Subsidiaries, and RBB Realization for the Third Quarter/2024 2. BNI Risk Profile as of September 30, 2024 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
42.	October 24, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Kick Off Meeting of BNI Financial Statement Audit for Financial Year 2024 2. One-on-One Interview with the Board of Directors	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
43.	October 25, 2024	**Board of Commissioners meeting invites the relevant Director** One-on-One Interview with the Board of Directors	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
44.	October 30, 2024	**Board of Commissioners meeting invites the relevant Director** Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Online

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
45.	October 31, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Evaluation of BNI Information Technology (IT) 2. Evaluation of Anti Fraud Strategy, WBS, Significant Fraud, Compliance Function, AML/CFT, and SMAP Internal Meeting of the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Absent 11. Present	Hybrid
46.	November 7, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Evaluation of talent development and the Board of Commissioners development program 3. Follow-up of internal and external audit findings	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Absent 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
47.	November 14, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. Approval of the 2025 RBB/RKAP, 2025 RAKB, 2025-2029 RJP/ Corporate Plan, and 2025 Board of Directors Collegial KPIs. 2. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
48.	November 21, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Approval of BNI DPLK Business Plan and RAKB 2025 2. BNI Recovery Plan 2024/2025 Update 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Absent 11. Absent	Hybrid
49.	December 3, 2024	**Board of Commissioners meeting invites the relevant Director** 1. wondr by BNI Update 2. Principle Approval for Procurement and Budget of Public Accounting Firm (KAP) for Financial Report of Fiscal Year 2025 3. Credit Consultation to the Board of Commissioners	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Online
50.	December 5, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Bank Credit Policy 2024 Review 2. Credit Consultation to the Board of Commissioners 3. Approval of the Review of General Policy on Risk Management (KUMR) and General Policy on Integrated Risk Management and Integrated Capital (KUMRT) Year 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
51.	December 12, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Consultation regarding write-offs to the Board of Commissioners 2. Credit Consultation to the Board of Commissioners 3. Evaluation of BNI Payment Services implementation 4. Evaluation of Material Case Progress Report	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
52.	December 17, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Approval of MSME Debtor Write-off Policy (in accordance with Government Regulation No. 47 Year 2024) 2. Credit Consultation to the Board of Commissioners 3. OJK Reprimands and Sanctions during 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Online
53.	December 19, 2024	**Board of Commissioners meeting invites the relevant Director** 1. Credit Consultation to the Board of Commissioners 2. Approval of Review of General Policy on Internal Control System (KUSPI) and Internal Control Over Financial Reporting (ICOFR) Report 3. BNI Tantiem Budget 4. Approval of GCG Policy Review	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

1) Effectively changed his position from Vice President Commissioner to President Commissioner based on OJK approval since February 19, 2024.
2) Effective as Vice President Commissioner based on OJK approval since February 19, 2024
3) Ceased to serve as Commissioner since March 4, 2024
4) Served as Commissioner since March 4, 2024 and effective based on OJK approval since September 2, 2024

Joint Meetings of the Board of Commissioners and the Board of Directors

In 2024, the Board of Commissioners held joint meetings with the Board of Directors, with details of the agenda, dates, and participants as follows:

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
1.	January 18, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. Audit Closing Meeting for Fiscal Year 2023 2. BNI Health Level as of December 31, 2023	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
2.	January 25, 2024	**Board of Commissioners and the Board of Directors Meeting** BNI Financial Performance as of December 31, 2023	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Susyanto [3)] 9. Erwin Rijanto Slamet 10. Fadlansyah Lubis 11. Robertus Billitea	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
3.	April 25, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Financial Performance as of March 31, 2024 2. BNI Individual Risk Profile as of March 31, 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
4.	June 20, 2024	**Board of Commissioners and the Board of Directors Meeting** Revised BNI RBB 2024-2026	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
5.	August 15, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance, Subsidiaries, and RBB Realization for the Second Quarter/2024 Period 2. Board of Directors Collegial KPI for 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Absent 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid
6.	October 17, 2024	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance, Subsidiaries, and RBB Realization for the Third Quarter/2024 2. BNI Risk Profile as of September 30, 2024	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
7.	November 14, 2024	**Board of Commissioners and the Board of Directors Meeting** Approval of RBB/RKAP 2025, RAKB 2025, RJP/Corporate Plan 2025-2029, and Board of Directors Collegial KPI 2025	1. Pradjoto [1)] 2. Pahala Nugraha Mansury [2)] 3. Sigit Widyawan 4. Askolani 5. Asmawi Syam 6. Septian Hario Seto 7. Iman Sugema 8. Erwin Rijanto Slamet 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana [4)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Absent	Hybrid

1) Effectively changed his position from Vice President Commissioner to President Commissioner based on OJK approval since February 19, 2024.
2) Effective as Vice President Commissioner based on OJK approval since February 19, 2024
3) Ceased to serve as Commissioner since March 4, 2024
4) Served as Commissioner since March 4, 2024 and effective based on OJK approval since September 2, 2024

Scheduled Meetings for 2025 [ACGS D.3.1]

The Board of Commissioners has prepared the schedule for the Board of Commissioners Meetings and Joint Meetings with the Board of Directors for 2025 based on the Board of Commissioners' Work Plan and Budget (RKA) established at the beginning of the year. The 2025 meeting plan outlines that, in general, the duties, authorities, and responsibilities of BNI's Board of Commissioners in overseeing management policies, the course of management both regarding the company and the company's business carried out by the Board of Directors based on statutory regulations including duties, authorities and obligations, and responsibilities related to matters which include but are not limited to ensuring the implementation/supervising/ evaluating/ giving direction/assessment of:

a. Bank's strategic policies.
b. Bank Business Plan & Corporate Work Plan and Budget.
c. Bank's Soundness Level, including BNI's Risk Profile and the risk profile of Financial Service Institutions within BNI's Financial Conglomeration.
d. Recovery Action Plan.
e. Internal Control System.
f. Internal audit functions, including follow-ups on audit findings and recommendations from the Bank's internal audit unit, external auditors, supervision results from the Financial Services Authority (OJK), and/or other regulatory authorities.
g. Internal audits in Subsidiaries.
h. Risk Management and Risk Management strategies.
i. Integrated Risk Management within the Financial Conglomeration.
j. Corporate Governance.
k. Integrated Governance within the Financial Conglomeration.
l. Integrated Capital Management.
m. Bank Compliance Function.
n. Implementation of Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) programs, as well as the Prevention of the Financing of Proliferation of Weapons of Mass Destruction (PPPSPM).
o. Anti-Fraud Strategy.
p. Human Resources.
q. Appointment of Public Accounting Firms.
r. Resolution Plan.
s. Implementation of Consumer and Public Protection at BNI.
t. Provision of Payment Services at BNI.
u. Bank Information Technology, covering IT strategic planning, IT governance, IT risk management policies, IT audit planning and implementation, and the management of reliable and effective IT security to ensure the availability, confidentiality, and accuracy of information.

Training and/or Competency Enhancement for Board of Commissioners Members in 2024

Policy on Ongoing Training and/or Competency Development [ACGS D.5.2]

In line with the provisions of OJK Regulation No. 24 of 2022 concerning the Development of the Quality of Human Resources in Commercial Banks, BNI facilitates competency development programs for all members of the Board of Commissioners to support their oversight function in monitoring the management and operations of the Bank carried out by the Board of Directors. Recognizing the increasingly complex economic and banking industry developments, as well as the growing risks faced by the banking business, BNI continuously strives to enhance the competency of the Board of Commissioners through both formal and informal training programs, both domestically and internationally. These programs include individual training, certifications, workshops, and sharing sessions. Each year, BNI prepares a Competency Development Program plan for the Board of Commissioners, which may be organized internally by the Bank, in collaboration with external experts, or by participating in external programs that aim to enhance competencies.

Training and/or Competency Enhancement in the 2024 Fiscal Year [ACGS D.5.2]

In 2024, all members of BNI's Board of Commissioners actively participated in several training and/or competency development activities as follows:

Training and/or Competency Enhancement in the 2024 Fiscal Year

No.	Training/Workshop/Conference/Seminar	Date	Venue	Type of Education	Organizer
Pradjoto – President Commissioner/Independent Commissioner [1)]					
1	As a resource person at the 202nd Batch Branch Leader Program	February 26, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Banking Risk Management Debriefing Program Qualification 6 Without Tiering	April 29, 2024	Jakarta	Online	Lembaga Pengembangan Perbankan Indonesia (LPPI)
3	Compliance Forum: Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Offline	BNI University
4	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	August 21-23, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)
5	As a resource person at the Executive Overview Program for Candidates for the Board of Commissioners of Commercial Banks with the topic Main Duties, Roles, and Functions of the" Board of Commissioners of Commercial Banks	October 16, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
Pahala Nugraha Mansury – Vice President Commissioner [2)]					
1	Banking Risk Management Debriefing Program Qualification	June 13, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Risk Management Alignment Seminar - Level 7: Improving Risk Management Implementation to Achieve a Sustainable Banking Industry	July 17-18, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)
3	ational Certification Online Training "Integrated Risk Governance Expert/ Certified Risk Governance Professional "(CRGP)	September 17-18, 2024	Jakarta	Online	PT RAP Indonesia
4	Executive Education Program: Generative AI and Business Transformation	October 28-31, 2024	Philadelphia, USA	Offline	Wharton School – University of Pennsylvania
Sigit Widyawan – Independent Commissioner					
1	Banking Risk Management Debriefing Program Qualification 6 Without Tiering	April 29, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Commissioner/Audit Committee Special Class of Indonesia Internal Audit Practitioner (IIAP) Certification Program	May 31, 2024	Bogor	Offline	The Institute of Internal Auditors
3	Compliance Forum: Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Offline	BNI University
4	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	September 18-20, 2024	Bali	Offline	Bankers Association for Risk Management (BARa)
5	Executive Education Program: AI & Big Data Expo	October 1-2, 2024	Amsterdam, Belanda	Offline	Tech EX, Amsterdam
Askolani – Commissioner					
1	GOP Debriefing: Corporate Governance Masterclass	August 12-13, 2024	Jakarta	Online	Center for Risk Management & Sustainability (CRMS)
2	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	August 21-23, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)

No.	Training/Workshop/Conference/Seminar	Date	Venue	Type of Education	Organizer
3	Executive Education Program: Digital Strategies for Transforming Your Business	October 1-2, 2024	Cambridge, USA	Offline	MIT Sloan School of Management
Asmawi Syam – Independent Commissioner					
1	Risk Management Alignment Seminar - Level 7: Improving Risk Management Implementation to Achieve a Sustainable Banking Industry	May 21-22, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)
2	Commissioner/Audit Committee Special Class of Indonesia Internal Audit Practitioner (IIAP) Certification Program	May 31, 2024	Bogor	Offline	The Institute of Internal Auditors
3	Banking Risk Management Debriefing Program Qualification 7	June 20, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
4	CGOP Debriefing: Corporate Governance Masterclas	August 12-13, 2024	Jakarta	Online	Center for Risk Management & Sustainability (CRMS)
5	Compliance Forum: Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Offline	BNI University
6	Executive Education Program: AI & Big Data Expo	October 1-2, 2024	Amsterdam, Belanda	Offline	Tech EX, Amsterdam
Iman Sugema – Independent Commissioner					
1	Banking Risk Management Debriefing Program Qualification 6 Without Tiering	April 29, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Compliance Forum: Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Online	BNI University
3	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	September 18-20, 2024	Bali	Offline	Bankers Association for Risk Management (BARa)
4	Executive Education Program: AI & Big Data Expo	October 1-2, 2024	Amsterdam, Belanda	Offline	Tech EX, Amsterdam
Septian Hario Seto – Independent Commissioner					
1	Banking Risk Management Debriefing Program Qualification 6 Without Tiering	May 3, 2024	Jakarta	Online	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	August 21-23, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)
3	Executive Education Program: Leading Change & Organizational Renewal	September 15-20, 2024	Palo Alto, USA	Offline	Standford School of Business
Erwin Rijanto Slamet – Independent Commissioner					
1	CGOP Debriefing: Corporate Governance Masterclass	August 12-13, 2024	Jakarta	Offline	Center for Risk Management & Sustainability (CRMS)
2	Compliance Forum: Realizing an Anti-Corruption Culture Through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Offline	BNI University
3	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Realize a Sustainable Banking Industry	August 21-23, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)

No.	Training/Workshop/Conference/Seminar	Date	Venue	Type of Education	Organizer
4	Executive Education Program: Leading and Sustaining a Culture of Innovation	September 16-19, 2024	Chicago, USA	Offline	Kellog School of Management
Fadlansyah Lubis - Commissioner					
1	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	August 21-23, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)
2	Compliance Forum: Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Online	BNI University
Robertus Billitea – Commissioner					
1	Banking Risk Management Debriefing Program Qualification 6 Without Tiering	April 25, 2024	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	October 16-18, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)
Mohamad Yusuf Permana – Commissioner [3)]					
1	Banking Risk Management Debriefing Program Qualification 6 Without Tiering	May 9, 2024	Jakarta	Online	Lembaga Pengembangan Perbankan Indonesia (LPPI)
2	Risk Management Alignment Seminar - Level 6: Improving the Oversight Function of Risk Management Implementation to Achieve a Sustainable Banking Industry	August 21-23, 2024	Jakarta	Offline	Bankers Association for Risk Management (BARa)

[1)] Effectively change position, from previously serving as Deputy President Commissioner to President Commissioner, based on OJK approval effective from February 19, 2024.
[2)] Effectively assuming the role of Deputy President Commissioner based on OJK approval effective from February 19, 2024.
[3)] Serving as Commissioner starting from March 4, 2024, and effective based on OJK approval from September 2, 2024.

Orientation and Introduction Program for New Board of Commissioners Members

[ACGS D.5.1]

Through the Board of Commissioners Decree No. KEP/024/DK/2024 dated October 22, 2024, regarding the Charter of the Board of Commissioners as the Guideline and Code of Conduct for the Board of Commissioners, it is stipulated that every newly appointed member of the Board of Commissioners must undergo an orientation and introduction program concerning the performance of their duties and responsibilities at the Bank.

The purpose of this program is to provide a comprehensive understanding and overview of the Bank's general conditions, values, vision and mission, business activities, and subsidiaries, as well as to socialize the policies, procedures, and implementation of good corporate governance within the Bank. The program also demonstrates the Bank's compliance with the Ministry of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 dated March 3, 2023, regarding the Governance Guidelines and Significant Corporate Activities of State-Owned Enterprises, Article 43, which mandates that newly appointed members of the Board of Commissioners/Supervisory Board and the Board of Directors must receive an introduction program regarding the respective State-Owned Enterprise.

The orientation program for new members of the Board of Commissioners should at least receive materials in the form of document delivery, presentation, or explanation that can be done by the Board of Directors, Corporate Secretary, related divisions or units, as well as experts from external sources, which in general include the following information or matters:

1) The Bank's vision, mission, organizational structure, business activities, and operational network;
2) The Annual Report, the Company's Work Plan and Budget (RKAP), the Bank's Business Plan (RBB), the Company's Code of Ethics, BNI's Work Culture, the Board of Commissioners' Code of Conduct, the Corporate Governance Handbook, and the Company's Articles of Association;
3) Good Corporate Governance (including multiple positions, share ownership, and Independent Commissioners);

4) The duties, authority, and responsibilities of the Board of Commissioners and the Board of Directors, delegation of authority, and the limitations of the Board of Commissioners' authority in overseeing the Company based on applicable laws and regulations;
5) The Committees under the Board of Commissioners that are formed and directly accountable to the Board of Commissioners, the Secretary of the Board of Commissioners, and the Secretariat of the Board of Commissioners that support the smooth execution of the Board of Commissioners' duties; and
6) The remuneration and benefits provided to members of the Board of Commissioners.

During 2024, the Company facilitated an orientation and introduction program for the new Commissioner member, Mohamad Yusuf Permana, conducted from March to August 2024, with the following materials:
1) Orientation on the Duties and Responsibilities of the Board of Commissioners of BNI, which included:
   - The vision, mission, and organizational structure of BNI
   - The duties and functions of the Board of Commissioners
   - Good Corporate Governance of the Board of Commissioners
   - Committees under the Board of Commissioners, as well as the Secretary of the Board of Commissioners and the Secretariat of the Board of Commissioners, who assist with the smooth execution of the Board's duties
   - Risk Management Certification
   - Remuneration, facilities, and allowances for members of the Board of Commissioners
2) Orientation on the Internal Conditions of BNI, which included:
   - Corporate Plan
   - The Bank's Business Plan (RBB) and the Company's Work Plan and Budget (RKAP)
   - BNI's financial performance and that of its subsidiaries
   - BNI's business operations
   - Risk Management, Legal, Audit & Compliance Issues
3) Orientation on General Banking Knowledge, which included:
   - Good Corporate Governance (Role of the Board of Commissioners), Risk Management, and Compliance (GRC)
   - Asset Liability Management
   - Internal Audit
   - Sharing session related to the Fit & Proper Test process for Commissioner candidates

Risk Management Certification

In order to fulfil the competence of human resources in the field of risk management of the Bank, BNI conducts Certification and/or Refreshment programs and/or Risk Management alignment programs for the Board of Commissioners in accordance with the provisions of POJK No. 24 of 2022 concerning Quality Development of Human Resources of Commercial Banks, OJK Circular Letter No. 28/SEOJK.03/2022 concerning Risk Management Certification for Human Resources of Commercial Banks, and OJK Letter No. S-11/D.3/2024 dated 03 March 2024 concerning SMR Equalisation and Alignment for Directors and Board of Commissioners of Commercial Banks. As of 31 December 2024, all serving members of the Board of Commissioners have obtained valid Risk Management Certification ranging from Qualification Level 6 (JK-6) to Qualification Level 7 (JK-7), with the following description:

Name	Position	Qualification Level (JK)
Pradjoto	President Commissioner/Independent Commissioner	JK-6
Pahala Nugraha Mansury	Vice President Commissioner	JK-7
Sigit Widyawan	Independent Commissioner	JK-6
Askolani	Commissioner	JK-6
Asmawi Syam	Independent Commissioner	JK-7
Septian Hario Seto	Independent Commissioner	JK-6
Iman Sugema	Independent Commissioner	JK-6
Erwin Rijanto Slamet	Independent Commissioner	JK-6
Fadlansyah Lubis	Commissioner	JK-6
Robertus Billitea	Commissioner	JK-6
Mohamad Yusuf Permana	Commissioner	JK-6

Basis for Implementing the Duties of the Board of Commissioners

The Board of Commissioners' Work Plan and Budget (RKA) is a reference for the Board of Commissioners in carrying out its duties, authorities, and responsibilities as a supervisory body. The Board of Commissioners' RKA is prepared and submitted to the Board of Directors since the beginning of the financial year. The preparation of the RKA has complied with the following regulations:

1) Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated 3 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises Article 14 paragraph (8) stipulates that the Board of Commissioners/Supervisory Board is required to prepare an annual work plan and budget for the Board of Commissioners/ Supervisory Board which is an inseparable part of the Company's Work Plan and Budget (RKAP); and
2) BNI's Articles of Association Article 17 paragraph (2) which stipulates that the Board of Commissioners is required to prepare a work program for the Board of Commissioners which is an inseparable part of the Company's Annual Work Plan and Budget prepared by the Board of Directors.

Mechanism for Implementing the Board of Commissioners' Supervisory Duties

The procedures and mechanisms for carrying out the functions, duties, and responsibilities of the BNI Board of Commissioners are outlined as follows:

1) The Board of Commissioners holds Board of Commissioners meetings, including internal Board of Commissioners meetings, meetings with invited Sector Directors and Senior Executive Vice Presidents regarding the discussion agenda, or routine meetings with the Board of Directors;
2) The active role of the committees under the Board of Commissioners in assisting and supporting the smooth execution of the Board of Commissioners' duties includes conducting committee meetings, as well as carrying out evaluations, studies, or reviews of matters that are part of the Board of Commissioners' responsibilities;
3) Providing suggestions, advice or decisions of the Board of Commissioners in writing to the Board of Directors as:
   a. Follow-up to the results of the Board of Commissioners Meeting or the Board of Commissioners' meeting with the Board of Directors; and
   b. Responses to reports on the implementation of the Board of Directors' duties or requests for approval, consultation or proposals submitted by the Board of Directors to the Board of Commissioners, as well as information regarding strategic and significant problems based on the results of the Board of Commissioners' evaluation and review of written reports on the implementation of the Board of Directors' duties to the Board of Commissioners.
4) Implementation of working visits by the Board of Commissioners to BNI work unit environments and provision of advice and suggestions by the Board of Commissioners to the Board of Directors based on the results of the Board of Commissioners' working visits.

Report on the Implementation of the Duties of the Board of Commissioners in 2024

Throughout 2024, the Board of Commissioners, working collegially, has collectively carried out its duties, responsibilities, and obligations related to overseeing the governance policies and management operations of the Bank, in accordance with applicable laws and regulations, the Bank's Articles of Association, and the Work Plan established at the beginning of the year, including the following:

1. Carrying out the supervisory function of the Bank's Business Plan (RBB), including:
   a. Directing, monitoring and evaluating the implementation of the Bank's strategic policies in 2024, including evaluating the Corporate Plan and RBB and financial performance in 2024 every month;
   b. Supervising efforts to achieve the RBB, especially regarding the achievement of several important aspects of the business plan such as credit distribution, improving asset quality, collecting third-party funds, productivity, and efficiency;
   c. Reviewing the Revised RBB for 2024-2026;
   d. Evaluating the realization of the RBB reported to the Financial Services Authority every semester and submitting the RBB supervision report to the Financial Services Authority; and
   e. Conducting a review and providing approval for the 2025-2027 RBB.
2. Evaluating the Consolidated Financial Performance of BNI every month and submitting Performance Reports to the Ministry of State-Owned Enterprises on a quarterly basis;
3. Reviewing financial information to be issued by the Company;
4. Evaluating the implementation of the audit of the Consolidated Financial Statements of BNI and other reports for the fiscal year ending December 31, 2023, conducted by the Public Accounting Firm (KAP) or other external parties;
5. Proposing the appointment of the External Auditor to conduct the audit of the Consolidated Financial Statements and other reports for the fiscal year ending December 31, 2024, of PT Bank Negara Indonesia (Persero) Tbk.;

6. Carrying out a supervisory function on the implementation of internal control at BNI, including by:
   a. Ensuring that the internal control system at BNI is running well;
   b. Ensuring that the Board of Directors has monitored the effectiveness of the implementation of the Internal Audit Work Unit (SKAI) or BNI Internal Audit Unit;
   c. Supervise the implementation of the BNI Internal Audit Unit's duties, including:
      - Evaluate internal control or the BNI Internal Audit Unit;
      - Review the audit plan and implementation and monitor the follow-up of audit results from the implementation of the BNI Internal Audit Unit's duties;
      - Ensure that the Board of Directors has followed up on audit findings and recommendations from the BNI Internal Audit Unit, the results of supervision by the Financial Services Authority and/or supervision by other authorities, findings by the Audit Board of Indonesia (BPK), the Financial and Development Supervisory Agency (BPKP), external auditors or audit results of public accountants, including by ensuring that the Board of Directors follows up on audit findings both in writing and verbally; and
      - Review the main points of the audit results from the BNI Internal Audit Unit reported to the Financial Services Authority every semester
7. Conduct supervision, monitoring, and evaluation of the Bank's Health Level for Semester II-2023 and Semester I-2024 and support the Board of Directors to take the necessary steps in order to maintain and/or improve the Bank's Health Level;
8. Perform supervisory functions on BNI's Risk Management and Integrated Risk Management, including:
   a. Evaluate the Board of Directors' duties on the implementation of Risk Management policies and provide advice and input on the implementation of Risk Management policies periodically to ensure that the management of Bank activities and risks has been implemented effectively:
   b. Evaluate BNI's Risk Management policies and Risk Management strategies;
   c. Conduct quarterly reviews and evaluations of the Risk Profile and Minimum Capital and periodically evaluate BNI's risk position and development;
   d. Ensure that Risk Management policies and processes are implemented effectively and integrated into the overall Risk Management process;
   e. Evaluate and provide advice and input on the implementation of Integrated Risk Management Policies periodically;
   f. Provide approval for General/Risk Management Policies and General Integrated Risk Management Policies; and
   g. Ensure the implementation of Integrated Risk Management in accordance with the characteristics and complexity of the Financial Conglomerate business and ensure the implementation of Risk Management in each Financial Services Institution in the BNI Financial Conglomerate to support the effective implementation of Integrated Risk Management
9. Carry out supervisory functions on the implementation of compliance at BNI, including by:
   a. Evaluating the compliance function at BNI, ensuring that the compliance function at BNI has been implemented properly, and providing suggestions to the Board of Directors to improve the quality of the implementation of the compliance function; and
   b. Conducting reviews of reports on the implementation of the compliance function and the implementation of the duties of the Compliance Director submitted by the Board of Directors periodically.
10. Carry out supervisory functions on the implementation of the BNI Anti-Bribery Management System (SMAP);
11. Carry out supervisory functions on the implementation of the Anti-Fraud Strategy, Whistle Blowing System (WBS) at BNI, and Significant Fraud Reports to the OJK;
12. Carry out supervisory functions on the implementation of the Anti-Money Laundering, Prevention of Terrorism Funding, and Prevention of the Proliferation of Weapons of Mass Destruction Funding (APU PPT and PPPSPM) at BNI;
13. Regarding the implementation of the principles and practices of Good Corporate Governance (GCG) and the Implementation of Integrated Governance;
14. Ensure the implementation of GCG principles and practices at all levels or levels of the BNI organization and at the Financial Services Institutions in the BNI Financial Conglomerate:
    a. Supervise the implementation of Integrated Governance in the BNI Financial Conglomerate and evaluate/review the Integrated Governance Guidelines for improvement;
    b. Encourage the improvement of GCG practices by referring to applicable laws and regulations and international best practices;
    c. Review the GCG implementation report submitted by the Board of Directors;

d. Monitor the results of the GCG self-assessment and conduct a self-assessment of the effectiveness of the GCG implementation of the Board of Commissioners, including the committees under the Board of Commissioners every semester as required by the Financial Services Authority Regulation governing the implementation of GCG for Commercial Banks;
e. Monitor and evaluate the performance of Subsidiaries and the policies of the Board of Directors related to the creation of synergy and strengthening of the business of Subsidiaries;

15. Evaluate, direct, and monitor the implementation of BNI Information Technology (IT), including the Realization of the 2024 IT Program Strategic Plan and the 2025 IT Development Plan, in the development of the implementation of wondr by BNI;
16. Conduct periodic reviews of material case progress reports;
17. Monitor and evaluate the implementation of the Recovery Plan at BNI;
18. Supervise the implementation of the principle of prudence in the provision of credit facilities by the Board of Directors, including:
    a. Supervise the implementation of credit and financing plans that have been stated in the RBB;
    b. Provide advice and opinions on the Board of Directors' decisions regarding the provision of credit facilities above a certain amount that must be consulted with the Board of Commissioners;
    c. Provide approval for the provision of credit facilities to related parties that, based on applicable laws and regulations, must obtain approval from the Board of Commissioners;
    d. Conduct routine and periodic reviews of the development and follow-up of credits that have been consulted with the Board of Commissioners;
    e. Evaluate and provide approval for credit policies and strategies in accordance with the obligations stipulated in applicable laws and regulations; and
    f. Conducting periodic reviews of the development and quality of the overall credit or financing portfolio, including Non-Performing Loans (NPL).
19. Monitoring and evaluating the development and management of Human Resources (HR), especially regarding the strategic function of Human Resources in supporting the achievement of Bank performance;
20. Providing consultation on the provision of credits and write-offs that in accordance with the provisions, must be consulted with the Board of Commissioners;
21. Conducting periodic evaluations of the implementation of the duties and responsibilities of the Sector Director, including the achievement of the Sector Director's work plan, especially related to strategic and significant issues;
22. Conducting a review of the Performance of the Financial Institution Pension Fund (DPLK) in 2023 as the DPLK Supervisory Board and submitting the Supervision Report on the BNI Financial Institution Pension Fund (DPLK) Business Plan for Semester II of 2023 and Semester I of 2024 to the OJK;
23. Conduct an evaluation of the 2023 BNI DPLK Governance Report, the 2023 BNI DPLK Health Level Assessment Report, the 2023 BNI DPLK Risk Management Implementation Report for Semester II of 2023 and Semester I of 2024;
24. Conduct periodic supervision and evaluation of the implementation of remuneration and Outsourcing management policies and systems at BNI, including the remuneration of the Board of Directors and Board of Commissioners and employees;
25. Conduct an evaluation of the implementation of consumer and community protection in the financial services sector at BNI, and an evaluation of the implementation of Payment Services at BNI;
26. Conduct an evaluation of the Achievement of the Macroprudential Inclusive Financing Ratio (RPIM) of BNI and the BNI RPIM Development Strategy;
27. Conduct an evaluation of the review of the General Policy of the Internal Control System (KUSPI) and Internal Control Over Financial Reporting (ICOFR), including:
    a. Internal Control Over Financial Reporting Diagnostic Results Report;
    b. Review of the General Policy of Internal Control System and Integrity Procedures of Bank Financial Reporting (Internal Control Over Financial Reporting); and
    c. Roadmap for Implementation of Internal Control Over Financial Reporting and BNI's Readiness to Implement the Roadmap for Implementation of Internal Control Over Financial Reporting.
28. Granting approval to matters that must be approved by the Board of Commissioners based on applicable laws and regulations and the Company's Articles of Association, including:
    a. Approval of Capital Participation;
    b. Approval of Provision of Funds to Related Parties;
    c. Approval of BNI Organizational Structure;

d. Approval of the Revision of BNI Bank's Business Plan for 2024-2026;
e. Approval of BNI Bank's Business Plan for 2025-2027;
f. Approval of the Long-Term Plan (RJP)/ Corporate Plan for 2025-2029;
g. Approval of the Company's Work Budget Plan for 2025;
h. Approval of BNI's Recovery Plan Document for 2024/2025;
i. Approval of BNI's Risk Appetite Statement (RAS) for 2024;
j. Approval of the Internal Audit Annual Audit Plan for 2024;
k. Approval of BNI's Sustainable Financial Action Plan (RAKB) for 2025;
l. Approval of the Management of BNI Subsidiaries;
m. Approval of the Organizational Structure of the Board of Directors (Directorate Division) of BNI;
n. Approval of the Updating of the Anti-Money Laundering, Prevention of Terrorism Funding, and Prevention of the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM) Policies and Procedures of BNI and Custody;
o. Approval of the Updating of the General Policy on Risk Management and Capital Management, as well as the General Policy on Integrated Risk Management;
p. Approval of the Updating of the Governance Policy;
q. Approval of the Updating of the Integrated Governance Policy;
r. Approval of the Review of the Compliance Charter;
s. Approval of the Updating of the General Policy on the Internal Control System;
t. Approval of the Updating of the Human Capital Policy, including the Talent Development Policy, related to the Talent Pool;
u. Approval of the Updating of the Internal Audit Charter in 2024;
v. Approval of the Update of the Anti-Money Laundering, Prevention of Terrorism Funding and Prevention of the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM) Policies and Procedures of DPLK BNI;
w. Approval of the Business Plan and Sustainable Financial Action Plan (RAKB) of DPLK BNI for 2025;
x. Approval of the Risk Appetite Statement (RAS) and Risk Appetite Metric (RAM) of DPLK BNI for 2024;
z. Approval of the Update of the Guidelines and Work Rules of the BNI Board of Commissioners and the Rules of Procedure of the Board of Commissioners Meeting;
aa. Approval of the Update of the Policy on Write-Off of Debtors of Micro, Small, and Medium Enterprises (UMKM), which refers to Government Regulation No. 47 of 2024 concerning the Write-Off of Bad Debts to UMKM;
bb. Approval of the Company's Policies or Guidelines which based on the Financial Services Authority Regulation must obtain the approval of the Board of Commissioners.
29. Submitting a report to the Ministry of SOEs in the form of the Board of Commissioners' response to the BNI performance report every quarter as a follow-up to the Letter of the Minister of SOEs in 2014 to the BNI Board of Commissioners that in order to make supervision and guidance of SOE performance more effective, the Board of Commissioners is requested to submit opinions and responses to BNI's performance report for the quarterly period;
30. Holding Board of Commissioners Meetings, both internal Board of Commissioners Meetings and by inviting members of the Board of Directors or related Sector Directors as well as Board of Commissioners Meetings with the Board of Directors regularly to discuss certain aspects such as business aspects, organization, risk management, internal control, legal and compliance, human resources, technology and others which are held routinely as many as 53 (fifty-three) meetings; and
31. Conducting visits to Divisions/Units, Regional Offices, and Branch Offices, including Overseas Offices offline and/or online, in order to carry out the supervisory function.

List of Recommendations /Suggestions / Advice from the Board of Commissioners in 2024

Throughout 2024, the Board of Commissioners has issued several important Recommendations/Advice to the Board of Directors regarding the management and administration of the Bank, including:

1. General Performance
   a. In facing challenges with peers and future market trends, the Board of Directors should continue to explore breakthroughs that can be implemented to encourage the creation of new businesses and provide a positive impact on improving the Company's business.
   b. The Board of Directors should continue to strive to improve internal business processes through the creation of appropriate policies, quality human resources, and adequate technology so as to produce quality performance.
   c. In implementing the Company's strategy, the Board of Directors is expected to continue to improve the implementation of adequate risk

management and prepare possible scenarios, by conducting business prudently and guided by applicable laws and regulations, and implementing the principles of Good Corporate Governance (GCG).

2. Credit
   a. The Board of Commissioners reminds the Board of Directors regarding the credit granting process to be conducted prudently and the strict implementation of the four-eyes principle in every process, including a thorough analysis of the business conditions directly related to repayment capacity, ensuring that the collateral adequacy ratio meets the minimum requirements according to the Bank's Credit Policy (KPB), monitoring the use of credit facilities, and tracking the debtor's business development to prevent any side-streaming of credit facility usage.
   b. The Board of Commissioners advises the Board of Directors to carry out Strengthening Culture in sectors that are starting to sunset in the portfolio at BNI, so that the weakening conditions that occur do not have a significant impact on BNI's portfolio.
   c. In connection with the implementation of the end-to-end credit process improvement program, an evaluation of the program must be carried out comprehensively to assess its effectiveness, and the necessary corrective actions must be taken so that the objectives of implementing the end-to-end credit process improvement program can be achieved. The Board of Commissioners also reminds the Board of Directors that the improvement of the credit process can pay attention to audit findings, both from internal audits and regulators/external auditors (OJK, BPK, and KAP). Credit process improvements are carried out, among others, through increasing the discipline of the normal credit process and enriching the competencies of human resources related to the credit process.
   d. The Board of Commissioners reminded that strengthening the Small segment must be carried out continuously, and improvements must be made in order to achieve the desired standards. The improvements in question include improving the credit granting process (evaluation of the quality of decision-making through the implemented scoring system), verification/validation discipline, pipeline management discipline, and collection effectiveness so that it can create good credit quality, improve systems and increase human resource quality. The Board of Directors also needs to be able to focus on top-tier debtors in each Region, as well as in leading sectors, so that quality growth in the Small segment can be achieved.
   e. In addition, it is necessary to pay attention to the role of the Region, especially in terms of optimizing the role of the Region to increase the value chain of the Corporate segment to support the Small segment by utilizing data leads and synergy between segments.
   f. Concentration of Economic Sectors based on Sub-Sectors to be able to make a deeper study based on industry analysis by mapping which industrial sub-sectors are growing, surviving, and declining, then setting specific Risk Appetite/Risk Tolerance limits.
   g. The Loan Exposure Limit (LEL) condition in several economic sectors/sub-sectors that have been significantly exceeded is a serious concern for the Risk Management Unit and has escalated to the Board of Directors to determine the action plan that needs to be carried out. Business Units in all segments must always confirm the availability of LEL to the Risk Management Unit before submitting a credit proposal and are not permitted to submit credit to sectors/sub-sectors whose LEL conditions have been exceeded.
   h. Be more selective and prudent in providing People's Business Credit (KUR) by aligning with the current government policy direction.
   i. The Board of Directors must pay attention to the performance of service providers related to the credit process, namely the Public Accounting Firm (KAP) and/or Public Appraisal Service Office (KJPP), and the determination of service providers as BNI partners must be accompanied by selective screening so that partners with good and trusted conduct are obtained.
3. Liquidity
   a. To minimize liquidity risk, a strategy is needed to strengthen the long-term funding structure and a special strategy to manage the balance between the level of DPK and its distribution so that the level of liquidity reflected in the LDR can be maintained at a healthy and ideal level.
   b. The ALCO Committee needs to carry out its function with more discipline in allocating quotas that can be accommodated for special rate funds by taking into account the tolerance level of special rate funds that do not interfere with BNI's profitability, and to monitor to ensure that special rate funds do not become permanent funding.
   c. In terms of capital and liquidity management, the Bank should mitigate risks, including through assessments and stress tests with current conditions on a regular basis.

d. In relation to BNI's corporate action plans, both those that have been carried out and will be carried out, the Board of Commissioners reminds us to carry out a comprehensive study to support BNI's strategic targets with strong capital budgeting, and ensure that they have met applicable provisions. .

4. Digital Banking and Technology
   a. The launch of New Mobile Banking BNI (wondr by BNI) as a game changer for BNI and the banking industry in Indonesia, which is designed to follow global excellence standards, is expected to improve customer service in providing more planned and personal financial management solutions for the Indonesian people so that it can provide a positive contribution to the Bank's performance.
   b. The momentum for the launch of New Mobile Banking BNI (wondr) so that BNI can optimize it to increase fund expansion in the retail segment so that it can reduce dependence (shifting) on institutional funds and special rate funds.
   c. The Board of Commissioners supports coordination and the need for support from the Technology & Operation sector for system development for work processes so that they can be carried out automatically and increase productivity.
   d. The Board of Commissioners continuously reminds the Board of Directors to always maintain the security of the Bank's system to support the security of customer transactions and businesses, and prevent the possibility of high security to protect customer data and anticipate threats of viruses, malware, and other digital risks.
5. Strengthening the Company's Organization
   a. In an effort to transform Human Capital carried out through the New Ways of Working (NWOW) program, which aims to prepare the BNI organization for the future. With a new way of working in supporting the Company's strategic goals, the Board of Commissioners has provided suggestions and advice so that the implementation of this program can be managed and run well so that the Company is able to face new challenges and future changes.
   b. This NWOW program also includes strengthening the Regional Organization, with the need to continue to anticipate changes as an impact that arises from the implementation of digital banking at BNI, including changes in operational processes, the implementation of big data analytics, changes in branch standards and the smallest organizational units including in seeing the effectiveness and productivity of branch/organizational unit performance, sharpening the types of work and the composition and qualifications of employees who do the work.
6. Human Capital Policies and Procedures
   a. The existence of organizational changes as an impact of the application of the New Way of Working (NWOW) has changed the responsibilities and actors in the new organization. For this, it has been ensured that there is clarity regarding the person in charge and the scope of work of the organizational unit, not only those who carry out the Human Capital function but also organizational units with shared responsibility for the Human Capital function.
   b. The Human Capital Policy Update has been implemented, and the Board of Commissioners also advised and reminded to conduct periodic reviews of updates to other related policies so that they can become a well-integrated policy, including the Outsourcing Policy, Sanctions Policy, and others. Thus, the Human Capital Policy, which is a unified reference, does not lag behind changes in the environment and developments in other external and internal regulations.
   c. Socialization and internalization have been requested to be carried out intensively, especially for those responsible/managers/actors of shared responsibility both in the Human Capital organization, as well as each Line Manager/Superior in other organizations and employees in general. This aims for each individual in the organization at BNI to understand and carry out their role in the Human Capital function for the benefit of the development of their organizational unit and the self-development of each employee.
   d. Related to Career Management and Employee Placement, it can be regulated clearly and transparently so that there is guidance for employee placement in one location. The policies that have been prepared later so that they can be implemented properly and must not be violated so as not to reduce the Company's authority. Good guidance will build a good corporate culture.

e. The management of Small segment credit needs to be strengthened with the capability of qualified Credit Manager (RM) HR to increase productivity; it is also necessary to evaluate/supervise the Small segment from the Head Office and Regional Offices.

7. Bank Intermediation
   BNI's intermediation function serves as a key driver in facilitating Indonesia's economic growth, with a focus on sectors most in need of support amid uncertain conditions. However, the Board of Commissioners reminds the Board of Directors to continue adhering to prudential principles in order to enhance the quality of credit.
8. Implementation of Anti-Fraud Strategy
   a. Fraud cases and abuse of authority need to be handled properly, including within subsidiaries. The Bank and its subsidiaries must ensure preparedness in anticipating fraud, including ensuring that all Standard Operating Procedures (SOPs) for each business activity are properly executed and regularly evaluating the anti-fraud strategy.
   b. The Board of Commissioners advises the Board of Directors to ensure that concrete actions are in place to apply firm sanctions, both internal and external, that have a deterrent effect.
   c. The Board of Commissioners believes that the imposition of sanctions for employees who violate regulations and open opportunities for fraud has not provided an adequate deterrent effect. This includes sanctions that are not proportional to the fraudulent actions and/or the related employees. Therefore, the Board of Directors is advised to review the establishment of firm sanctions, not only for fraud perpetrators but also for those involved in the case or violating provisions that create opportunities for fraud. The Board of Commissioners reminds the Board of Directors to give attention to operational risk management and fraud control, as this will affect BNI's performance and erode stakeholder trust. Issues must be addressed at their root through reliable initiatives supported by competent resources and by optimizing automation processes since operational risks and fraud are inherent in human activities.
   d. Strengthening internal control functions, including monitoring the progress of corrective actions following fraud incidents, particularly those with significant impact on the Bank, and ensuring that no repeated cases occur.
   e. The Board of Commissioners advises the Board of Directors to increase employee awareness, including through the internalization of good work culture and the implementation of the AKHLAK core values to foster employees with high integrity.
   f. The implementation of the Whistle Blowing System (WBS) should be strengthened to have a significant impact on enforcing rules and building stakeholder trust in the effectiveness of WBS in uncovering fraudulent activities.
9. Overseas Branches (KLN)
   a. Overseas Branches should actively seize opportunities, particularly in Indonesia-related businesses, through cooperation with BNI Wholesale Banking, International Banking, Treasury, and BNI Securities Pte. Ltd. (BSPL). This will help optimize the potential of existing debtors, given that few banks have branches overseas and many Indonesian companies now have a presence abroad.
   b. The Board of Commissioners reminds the Board of Directors to optimize the compliance function at BNI's overseas branch in Singapore to coordinate with all overseas branches, follow up on findings from local regulators, OJK, or BPK, and ensure that these findings do not recur in the future.
   c. The Board of Commissioners expects the overseas branches to implement strong Compliance Risk Control and for the Board of Directors to ensure adequate compliance with applicable laws and regulations in the countries where the overseas branches are located.
10. BNI Pension Fund and BNI Pension Fund Management
    a. With the increasingly competitive DPLK market, the Board of Supervisors advises DPLK BNI to conduct a comprehensive analysis by identifying strengths and weaknesses, as well as opportunities and threats in the market, so that DPLK BNI can maintain its product advantages while continuing to innovate to attract consumer attention.

b. In relation to the implementation of the new core system for DPLK BNI, "SURE," it is recommended to conduct a Post Implementation Review (PIR) to ensure that the Business Requirement Documents (BRD) have been fully met and can support operations well without errors.
c. Fund placement in investment instruments should be carried out with a prudence principle, preceded by in-depth business analysis and consideration, and in accordance with prevailing regulations.
d. Ensuring that the internal control process at DPLK BNI runs well and is supported by comprehensive and up-to-date policies and SOPs by conducting periodic reviews to anticipate process changes that may enhance services or changes in regulations from regulators (OJK, PPATK).
e. Pension fund management must be governed well and professionally to ensure the pension fund grows and provides for participants by ensuring financial sustainability in retirement, giving employees (as participants) and the company or BNI (as the founder) a sense of security.

11. Integrated Governance and Risk Management
    a. The Board of Commissioners advises strengthening the implementation of TKT and Integrated Risk Management so that the Integrated Governance and Risk Management framework is updated to adjust to the direction of stakeholder policies and encourage close collaboration and communication between the functions of governance, risk management, compliance, and information technology so that good integrated governance and risk management can improve sustainability and long-term performance.
    b. Operational risks caused by fraud, integrity issues, verification mechanisms that are not implemented, and sanctions/fines from the Regulator due to non-compliance with reporting obligations. The Board of Commissioners provides advice so that the implementation of the operational risk framework can truly be a guideline in ensuring that the Three Lines of Model function effectively, internal processes are implemented properly, and encourage an increase in KPMR to a decrease in fraud and operational losses.
    c. The Board of Commissioners also pays attention to each improvement plan, action plan, and corrective action, which have been prepared by each Subsidiary Company, and the Board of Commissioners supports all improvement plans, action plans, and corrective actions to be followed up by each Subsidiary Company.
    d. Improvement plans, action plans and corrective actions followed up by each Subsidiary Company, to be optimally monitored by the Subsidiaries Management Division and related Work Units, with a clear timeline, and reported to all Subsidiary Company Development Directors.
    e. The Main Entity is expected to continue to strengthen the synergy of Integrated Work Units in BNI, between Internal Audit, Compliance, Risk Management, Anti Fraud, and Subsidiaries Management. This Work Unit integration will be a strong layering to prevent fraud and other forms of violations.

12. Implementation of Anti-Money Laundering and Prevention of Terrorism Financing and Weapons of Mass Destruction Proliferation Financing
    a. The implementation of the Anti-Money Laundering (AML), Terrorism Financing Prevention (TFP), and Weapons of Mass Destruction Proliferation Financing Prevention (WMDPP) program, which has been well executed, should always be evaluated and updated with current policies and trends. Additionally, the policies or guidelines that have been developed should be socialized to all employees.
    b. The Board of Commissioners advises the Board of Directors to ensure that all branch offices and business units interacting with customers are disciplined, including the implementation of Enhanced Due Diligence (EDD) for customers categorized as "High Risk," including Politically Exposed Persons (PEP) and related parties, as well as performing screening for Walk-In Customers (WIC) using the available platforms.
    c. The Negative List data, including PEP, should always be updated based on information received from the Financial Transaction Reporting and Analysis Center (PPATK) and/or other institutions, so it can be used as up-to-date guidance in the customer screening process.
    d. The Board of Commissioners advises the Board of Directors to ensure that the system supporting the analysis of Suspicious Financial Transaction Reports (LTKM) is equipped

with LTKM scenarios and accommodates mandatory points so that all data included in LTKM can be identified by the system.

e. Regarding the implementation of AML, TFP, and WMDPP at overseas branches (KLN), the Board of Commissioners reminds the Board of Directors to ensure that all overseas branches consistently utilize the Nice Actimize system for the implementation of these programs.
f. The Board of Commissioners also advises subsidiaries to ensure the achievement of data updates for AML, TFP, and WMDPP, especially for subsidiaries where this achievement has not yet been optimal, as failure to meet these standards will attract the attention of regulators.

13. Subsidiaries
    a. The Board of Directors should periodically evaluate the work programs of each subsidiary and take corrective actions as necessary to ensure that subsidiaries contribute more effectively to the Bank.
    b. The Board of Commissioners asks the Board of Directors to regularly review Diamond Clients and Wave Clients, as these will be the targets for execution and expansion from the subsidiaries, and this information should be continually updated with the subsidiaries, especially if there are indications of deteriorating conditions or quality of each Diamond Client and Wave Client.
    c. The Board of Commissioners also advises subsidiaries that have not met targets to continue to be supported in order to maximize their contributions by the end of 2024.
    d. Subsidiaries are expected to continue to enhance cooperation with BNI, particularly regarding Learning Tools. The collaboration between BNI and its subsidiaries is also expected to enrich training topics that can be provided to the employees of the subsidiaries.
    e. The Board of Commissioners suggests considering the preparation of synergistic efforts between BNI and its subsidiaries, utilizing wondr by BNI, to increase the number of users and transactions by consumers and employees of subsidiaries, as well as to leverage wondr by BNI as a super app supporting subsidiary businesses, in accordance with applicable sectoral regulations.
    f. It must be ensured that the facilities and services related to BNI and subsidiary synergy, which were previously available through the BNI Mobile Banking application, will also be available on the wondr by BNI app moving forward, ensuring that the positive synergy remains intact.
    g. Subsidiaries should mirror their parent company, especially in terms of implementing compliance culture and anti-fraud strategies.
    h. The Zero Fraud Tolerance commitment should become a value agreed upon within the BNI Financial Conglomerate, to be implemented by all levels of employees, from the main entity to subsidiaries. Management must emphasize that the financial conglomerate does not tolerate any form of fraud.
    i. The Board of Commissioners encourages the continued development of the Whistle Blowing System (WBS) at both the main entity and subsidiaries, as the Board believes the WBS at subsidiaries still needs improvement, particularly in building the trust of whistleblowers. The Board continues to remind that socialization should be more intensive in educating employees and raising the trust level, including in subsidiaries, to further enhance the WBS trust level.
    j. The Board of Commissioners notes that at the main entity level, attention has already been given to the surveillance system, exception reports, and risk control testing. The Board advises that BNI must continue to develop a strong surveillance system, exception reports, and risk control testing and encourage the strengthening of these systems at subsidiaries to ensure integrated anti-fraud measures that provide uniformity in the application of the four pillars of anti-fraud within the financial conglomerate.
    k. Both the main entity and subsidiaries should emphasize the implementation of anti-gratification practices within the BNI Financial Conglomerate, focusing not only on mitigation but also on forming strategies to prevent gratification.

Board of Directors Decisions Requiring Approval from the Board of Commissioners

[ACGS D.1.2]

The Board of Directors may issue Board of Directors Decrees to regulate specific matters related to the operational and business management of the Bank. However, there are exceptions for certain matters where the Board of Directors must obtain prior approval from the Board of Commissioners

before issuing such decrees, as stipulated in the Board of Commissioners Decree within specific limits and/or criteria that have been approved by the Series A Dwiwarna Shareholder. Referring to the Bank's Articles of Association and the Board of Commissioners Decree, while observing applicable laws and regulations in the Capital Market and Banking sectors, the scope of the Board of Directors' decisions that require written approval from the Board of Commissioners is as follows:

1) Disposal/transfer and/or pledging of the Company's assets with specific criteria and values exceeding a certain amount set by the Board of Commissioners, except for assets related to the Company's business activities in accordance with applicable laws, such as credit, securities, collateral acquired, movable property, and other assets obtained as part of the Company's operations, while considering regulations in the capital market and banking sectors;
2) Write-off of fixed assets due to certain conditions, including:
   (a) Loss;
   (b) Destroyed;
   (c) Irreparable damage (total loss);
   (d) Transfer costs exceeding the economic value obtained from the transfer;
   (e) Dismantling for reconstruction or transformation into another Fixed Asset, with a budget approved by the General Meeting of Shareholders (GMS)/Minister through the approval of the RKAP;
   (f) Dismantling with no reconstruction due to other planned programs as per the RKAP;
   (g) Dismantling for reconstruction due to a government program and/or
   (h) Based on laws and/or a final court decision, the Fixed Asset is no longer owned or controlled by the SOE.
3) Entering into cooperation with business entities or other parties, in the form of Joint Operations (KSO), Joint Ventures (KSU), Licensing Agreements, Build-Operate-Transfer (BOT), Build-Transfer-Operate (BTO), Build-Operate-Own (BOO), and similar agreements with terms or values exceeding those set by the Board of Commissioners;
4) Determining and changing the Company's logo;
5) Determining the organizational structure one level below the Board of Directors;
6) Making capital investments, selling investments, including changes to the capital structure of other companies, subsidiaries, and joint ventures, not for debt recovery, in accordance with capital market and banking regulations, with certain values set by the Board of Commissioners;
7) Establishing subsidiaries and/or joint ventures with values set by the Board of Commissioners in accordance with capital market and banking regulations;
8) Proposing the Company's representative as a candidate for the Board of Directors and Board of Commissioners at subsidiaries that significantly contribute to the Company and/or have strategic value, as determined by the Board of Commissioners;
9) Merging, consolidating, acquiring, demerging, or dissolving subsidiaries and joint ventures with values set by the Board of Commissioners in accordance with capital market and banking regulations;
10) Taking actions classified as material transactions as defined by regulations in the capital market and banking sectors, with certain values set by the Board of Commissioners, except for material transactions excluded by applicable regulations in the capital market and banking sectors;
11) Actions not specified in the RKAP; and
12) Transactions for the transfer, including selling, relinquishing collection rights, and/or ceasing to collect on:
    a. Bad debt that has been written off as part of credit resolution, either in whole or in part;
    b. The difference between the value of bad debt written off and the value of the transfer, including sales or relinquishing rights,

    which are carried out based on the policies of the Board of Directors approved by the Board of Commissioners and within the write-off ceiling limit set by the GMS, which remains in effect until new limits are established by the GMS.

The approval of the Board of Commissioners for points 1, 3, 6, 7, 8, and 9 above, with specific limits and/or criteria, is established after approval by the Series A Dwiwarna Shareholder. The establishment of these limits and/or criteria by the Board of Commissioners has also been determined in accordance with those approved by the Series A Dwiwarna Shareholder and is documented in the Board of Commissioners' Decree.

Implementation of Board of Commissioners' Decisions in 2024

The Board of Commissioners has the authority to issue Board of Commissioners Decrees related to strategic matters to assist and support the execution of its duties and responsibilities as the supervisory organ of the Board of Directors, as well as to enforce the application of good governance principles in the Bank. Below is a list of the Board of Commissioners' Decrees that have been implemented during 2024, including:

1) Appointment of Mr. Suhartono as a Member of the Integrated Governance Committee;
2) Appointment of Ms. Dwita Suherlina as an Independent Member of the Risk Monitoring Committee;
3) Appointment of Mr. Human Brillianto as an Independent Member of the Audit Committee;
4) Appointment of Mr. Bambang Setyogroho as an Independent Member of the Risk Monitoring Committee;
5) Confirmation of the Appointment of Mr. Pahala Nugraha Mansury as a Member of the Nomination and Remuneration Committee;
6) Confirmation of the Appointment of Mr. Pahala Nugraha Mansury as a Member of the Risk Monitoring Committee;
7) Confirmation of Termination of Appointment of Mr. Riswinandi as Member of the Integrated Governance Committee;
8) Allowances and Facilities for Members of the Board of Directors and Board of Commissioners;
9) Adjustment of Honorarium, Allowances, and Facilities for Independent Members of Committees Under the Board of Commissioners;
10) Adjustment of Honorarium, Allowances, and Facilities for Ms. Pasu Donnaria as Expert Staff of the Board of Commissioners;
11) Charter of the Integrated Governance Committee of PT Bank Negara Indonesia (Persero) Tbk;
12) Charter of the Risk Monitoring Committee of PT Bank Negara Indonesia (Persero) Tbk;
13) Charter of the Audit Committee and Code of Ethics of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk;
14) Charter of the Nomination and Remuneration Committee of PT Bank Negara Indonesia (Persero) Tbk;
15) Appointment of Mr. Suhendi Muharam as Independent Member of the Audit Committee;
16) Appointment of Ms. Nurani Raswindriati as an Independent Member of the Integrated Governance Committee;
17) Termination of the Appointment of Ms. Pasu Donnaria as an Expert Staff of the Board of Commissioners;
18) Charter of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk;
19) Rules of Procedure for Meetings of the Board of Commissioners and Joint Meetings of the Board of Commissioners with the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk;
20) Appointment of Mr. Rudy Tandjung as a Member of the Integrated Governance Committee;
21) Appointment of Mr. Mohamad Yusuf Permana as a Member of the Integrated Governance Committee and
22) Appointment of Mr. Mohamad Yusuf Permana as a Member of the Nomination and Remuneration Committee.

Board of Commissioners' Assessment of the Performance of Committees Under the Board of Commissioners [ACGS D.5.7]

In order to enhance the role of the Board of Commissioners in carrying out its supervisory and advisory functions to the Board of Directors, the Board of Commissioners has formed 4 (four) supporting committees under it, namely:

1. Audit Committee;
2. Risk Monitoring Committee;
3. Nomination and Remuneration Committee; and
4. Integrated Governance Committee.

The four committees above act as complementary organs for each other in supervising the Bank, but each committee has responsibilities in different areas.

The Board of Commissioners periodically evaluates the committees under its authority, including the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. Every year at least once a year, the Board of Commissioners provides a performance assessment of the committees at the Board of Commissioners level to ensure that the committees carry out their functions, duties, and responsibilities, taking into account the main performance indicators for the achievement of the committees' Work plans/programs established at the beginning of the year, the level of attendance and participation of committee members in meetings, and the submission of task implementation reports that describe the implementation of activities carried out by the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee.

Assessment Procedures and Criteria Used [ACGS D.5.7]

The Board of Commissioners provides a performance assessment of the committees at the Board of Commissioners level to ensure that the committees carry out their functions, duties, and responsibilities, taking into account the main performance indicators for the achievement of the committees' Work plans/programs established at the beginning of the year, the level of attendance and participation of committee members in meetings, and the submission of task implementation reports that describe the implementation of activities carried out by the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee.

In assessing the performance of committees under the Board of Commissioners, BNI has a number of criteria that are used as the basis for assessment, including at least:

a. Realization of the achievement of the committee's work plan/program during the financial year;
b. Level of attendance and participation in meetings; and
c. Submission of Task Implementation Report.

Party Conducting Performance Assessment of Committees of the Board of Commissioners

[ACGS D.5.7]

The Board of Commissioners periodically assesses the performance of committees under the Board of Commissioners, including the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. At least once a year, the Board of Commissioners provides a performance assessment of the committees at the Board of Commissioners level to ensure the implementation of activities carried out by the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee.

Result of Committee Performance Assessment in 2024

The Board of Commissioners has assessed that throughout 2024, the committees under the Board of Commissioners have performed their functions, duties, and responsibilities effectively, as evidenced by the successful realization of the work plans/programs set by each committee in 2024. The Board of Commissioners also evaluates that committee members have achieved a high level of attendance and active participation in meetings, with each committee providing periodic written reports on the execution of their duties to the Board of Commissioners. In supporting the implementation of the Board of Commissioners' duties and responsibilities, each committee has played a role in providing recommendations to the Board of Commissioners, which serve as considerations and complement the Board's perspective in carrying out its supervisory function.

The Board of Commissioners assesses that the committees at the Board of Commissioners level have carried out their functions, duties, and responsibilities well as described below:

- **Audit Committee**
  The Audit Committee carried out its oversight duties and responsibilities related to the review of financial information issued by the Bank to the public and/or to the Authorities. In addition, the Audit Committee also made reviews reviews to ensure regulatory compliance relevant to the Bank's activities, gave recommendations to the Board of Commissioners regarding the appointment of Public Accountants (AP) and Public Accounting Firms (KAP), and evaluated the effectiveness of the implementation of audits/services rendered by Public Accountants (AP) and Public Accounting Firms (KAP). The Audit Committee also reviewed the implementation of audits by internal and external auditors, and oversaw the implementation of follow-up actions by the Board of Directors.

- **Risk Monitoring Committee**
  The Risk Monitoring Committee has assessed the suitability between risk management policies and the implementation of Bank policies, and also monitors and evaluates the implementation of tasks by the risk management committee and risk management work unit. The results of this assessment are used to provide recommendations to the Board of Commissioners. The Risk Monitoring Committee evaluates the implementation of risk management for the Bank's 8 (eight) main risks, namely Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Strategic Risk, Legal Risk, Compliance Risk, Reputation Risk, and an additional 2 (two) other risks included in integrated risk management, namely Insurance Risk and Intragroup Transaction Risk.

- **Nomination and Remuneration Committee**
  The Nomination and Remuneration Committee has also carried out its role in carrying out supervisory duties and obligations, which include evaluating and formulating recommendations to the Board of Commissioners regarding regulations and policies related to nomination and remuneration for members of the Board of Commissioners, Board of Directors, executive officers and employees as a whole. This also

includes examining and assessing the company's talent management policies, as well as evaluating organizational development proposed by the Board of Directors in accordance with applicable regulations.

- **Integrated Governance Committee**
  The Integrated Governance Committee has evaluated the implementation of Integrated Governance by analyzing the level of effectiveness of internal control, implementation of integrated compliance, and performance of the Integrated Governance Guidelines. In addition, this committee provides recommendations to the Board of Commissioners of the Main Entity regarding the results of the evaluation of the implementation of Integrated Governance, as well as improvements that may be needed in the Integrated Governance Guidelines. The Integrated Corporate Governance Committee also assesses the conformity between the Integrated Governance Policy and the implementation of the policy and provides recommendations to the Board of Commissioners of the Main Entity regarding the Integrated Governance policy and how to implement it, with the aim of ensuring that Integrated Governance is managed effectively in all Financial Services Institutions within the BNI Financial Conglomerate.

Throughout 2024, the execution of programs and work plans by the committees under the Board of Commissioners was demonstrated by the level of participation, the number of meetings attended, and the reports detailing the activities carried out by the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. This indicates that these committees have effectively fulfilled their duties and responsibilities.

Completeness of the Board of Commissioners' Organ

To support the effective execution of the Board of Commissioners' duties and responsibilities, particularly in overseeing the management of the Bank by the Board of Directors, BNI establishes supporting organs under the Board of Commissioners, which consist of committees under the Board of Commissioners and the Board of Commissioners Secretariat. The establishment and implementation of the Secretariat of the Board of Commissioners and the supporting committees under the Board of Commissioners have taken into account the provisions of applicable laws and regulations, including:

1) Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises and Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 dated March 20, 2023, concerning Organs and Human Resources of State-Owned Enterprises, the organs of the Board of Commissioners may consist of the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee, as well as the Secretariat of the Board of Commissioners;
2) Regulation of the Financial Services Authority No. 18/POJK.03/2014, dated November 18, 2014, concerning the Implementation of Integrated Governance for Financial Conglomerates, in order to support the effectiveness of the implementation of its duties, the Board of Commissioners of the Main Entity is required to form an Integrated Governance Committee;
3) Financial Services Authority Regulation No. 45/POJK.03/2015, dated December 23, 2015, concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks, in carrying out the task of supervising the implementation of the Remuneration policy and periodically evaluating the Remuneration policy, the Board of Commissioners is required to form a Remuneration Committee;
4) Financial Services Authority Regulation No. 55/POJK.04/2015, dated December 23, 2015, concerning the Establishment and Guidelines for the Implementation of the Audit Committee, Issuers or Public Companies are required to have an Audit Committee and
5) Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, concerning the Implementation of Governance for Commercial Banks, in order to support the effectiveness of the implementation of duties and responsibilities, the Board of Commissioners is required to form at least an Audit Committee, a Risk Monitoring Committee, and a Nomination and Remuneration Committee.

Committees Under the Board of Commissioners

In consideration of BNI's business needs and applicable regulations, the Bank has established several supporting committees under the Board of Commissioners, which are tasked with and directly responsible to the Board of Commissioners. The existence of these supporting committees is expected to enhance the effectiveness of the supervisory or control functions over the management of the Bank by the Board of Directors, as well as help ensure the implementation of governance pillars across

all business and operational aspects of the Bank. In 2024, the Board of Commissioners has 4 (four) committees to support the implementation of its duties and responsibilities, including:
1) Audit Committee (KA);
2) Risk Monitoring Committee (KPR);
3) Nomination and Remuneration Committee (KNR); and
4) Integrated Governance Committee (KTKT).

The Board of Commissioners has established written guidelines or charters that clearly govern the procedures for the appointment, dismissal, assignment of duties, and determination of honorariums for members of committees under the Board of Commissioners. These guidelines or charters are reviewed periodically and refined or updated to align with developments or changes in applicable legal regulations and current conditions. The most recent update was carried out in 2018, as stipulated in the Decree of the Board of Commissioners No. KEP/002/DK/2018, dated February 8, 2018, concerning "General Provisions for the Appointment, Dismissal, Assignment of Duties, and Honorariums for Members of Committees Under the Board of Commissioners," which essentially includes the following provisions:
1) Procedures for appointing Committee members;
2) Main points that need to be regulated in the work agreement for Committee members from independent parties with BNI;
3) Provisions on Concurrent Positions, outlining the permitted and prohibited dual roles for committee members in accordance with applicable laws and regulations.
4) Period of appointment/term of office of committee members;
5) Division of tasks and scope of duties of the Committee;
6) Obligation of attendance of Committee members at the Company;
7) Honorarium for Committee members from independent parties;
8) Evaluation/assessment of the performance of Committee members from independent parties;
9) Termination of Appointment of Committee members; and
10) Resignation of Committee members.

Working Mechanism of Committees Under the Board of Commissioners

The implementation of the duties of the committees under the Board of Commissioners must be guided by the respective Committee Charters as established through the Board of Commissioners Decree and published on the Bank's official website, namely:
1) Decree of the Board of Commissioners No. KEP/018/DK/2024 dated June 6, 2024, concerning the "Audit Committee Charter and Code of Ethics of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk";
2) Decree of the Board of Commissioners No. KEP/016/DK/2024, dated June 6, 2024, concerning the "Integrated Governance Committee Charter";
3) Decree of the Board of Commissioners No. KEP/019/DK/2024, dated June 6, 2024, concerning the "Nomination and Remuneration Committee Charter"; and
4) Decree of the Board of Commissioners No. KEP/017/DK/2024, dated June 6, 2024, concerning the "Risk Monitoring Committee Charter."

At the beginning of each year, all committees under the Board of Commissioners prepare their respective Work Plan Programs to be used as a reference in carrying out their duties in assisting the implementation of the Board of Commissioners' duties, both through monitoring activities, reviewing/reviewing and providing advice or recommendations to the Board of Commissioners regarding matters related to the functions and duties of the relevant committees through the following mechanisms:
1) The Committee holds meetings both internally and by inviting the relevant Director, unit and/or division and/or related unit;
2) The Committee conducts a review/evaluation/review and discussion/discussion outside the meeting forum, which, if necessary, is conducted with related units or divisions/units;
3) The results of the meeting or evaluation/review and discussion/discussion outside the meeting forum are submitted by the Committee Chair to the Board of Commissioners as a report either in writing or in the Board of Commissioners Meeting forum discussing the related agenda; and
4) The Committees under the Board of Commissioners submit a report on the realization of their work programs/activities every quarter to the Board of Commissioners.

Further information related to each Committee is presented separately in a separate sub-chapter, page 792.

Performance Assessment of Committees Under the Board of Commissioners

Information related to the performance assessment of the committees under the Board of Commissioners has been presented separately in a separate sub-chapter, page 695.

Performance Assessment or Evaluation of Independent Committee Members

The committee chair conducts performance evaluations of independent committee members annually or as needed at any time. The performance evaluation includes Performance Assessment

Indicators that cover but are not limited to, the competence and expertise, quality of output, discipline, and attendance of the respective committee members at the Bank, as well as the execution of duties and responsibilities in accordance with the committee charter and work procedures applicable to independent committee members under the Board of Commissioners. Furthermore, the results of the evaluation and assessment, as referred to, are submitted as recommendations to the Board of Commissioners to extend or terminate the appointment of the committee members concerned at the Bank. The assessment factors used as the basis for assessing the performance of committee members under the Board of Commissioners who come from independent parties (not the Board of Commissioners), are as follows:

1. Duties according to the Committee Charter (weight 25%);
2. Competence and Skill (weight 30%);
3. Output Quality (weight 30%); and
4. Attendance Level (15%).

Obligation of Attendance of Committee Members Coming from Independent Parties

Independent committee members from outside the Bank are required to be present regularly during the Bank's working days and hours, in accordance with the schedule determined by the Board of Commissioners and/or the committee chairperson. This includes attending Committee Meetings and performing other assigned duties. Additionally, they are required to sign the attendance register at the Bank when carrying out tasks beyond attending Committee Meetings. If necessary, at the request of the Board of Commissioners and/or the committee chairperson, independent committee members must also be present at the Bank, during Board of Commissioners Meetings or Committee Meetings, or at specific activities that require the presence of the Board of Commissioners. This requirement applies outside the previously established frequency and schedule of routine attendance. Information regarding the committees under the Board of Commissioners and the Secretary of the Board of Commissioners is provided in a separate sub-chapter.

Board of Commissioners Secretariat Organ

The BNI Board of Commissioners Secretariat is headed by the Secretary of the Board of Commissioners, an external appointee, supported by the staff of the Board of Commissioners Secretariat. The functions and duties of the Board of Commissioners Secretariat and the Secretary of the Board of Commissioners are carried out in accordance with the Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023, dated March 20, 2023, concerning the Organs and Human Resources of State-Owned Enterprises. Information regarding the Secretariat of the Board of Commissioners and the Secretary of the Board of Commissioners is presented in a separate sub-chapter.



Independent Commissioner

Independent Commissioners are members of the Board of Commissioners who do not have financial, management, share ownership, and/or familial relationships with fellow members of the Board of Commissioners, the Board of Directors, and/or Controlling Shareholders or other relationships that could influence their ability to act independently. The Independent Commissioner is responsible for supervising and also representing the interests of minority shareholders in accordance with GCG principles. Determination of the criteria and number of Bank Independent Commissioners has met the requirements in accordance with OJK Circular Letter No. 13/SEOJK.03/2017 concerning Implementation of Governance for Commercial Banks, including POJK No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks.

Criteria and Number of Independent Commissioners

As of December 31, 2024, BNI has 6 (six) Independent Commissioners or 54.55% of the total members of the Board of Commissioners of 11 (eleven) people. Therefore, the number of BNI Independent Commissioners has met the criteria required in POJK No. 17 of 2023, namely a minimum of 50% of the total members of the Board of Commissioners. The number of BNI Independent Commissioners has also met the minimum number of Independent Commissioners regulated in the ASEAN Corporate Governance Scorecard, which requires the number of Independent Commissioners to be 50% (fifty percent) of the total number of members of the Board of Commissioners. [ACGS (B).D.4.1, D.2.4]

The current members of the Bank's Independent Commissioners are as follows:

No.	Name	Position	Legal Basis of Appointment	Term of Office
1	Pradjoto	President Commissioner/Independent Commissioner	EGMS September 19, 2023	2020-2025
2	Sigit Widyawan	Independent Commissioner	AGMS March 15, 2023	2023-2028
3	Asmawi Syam	Independent Commissioner	AGMS February 20, 2020	2020-2025
4	Iman Sugema	Independent Commissioner	AGMS February 20, 2020	2020-2025
5	Septian Hario Seto	Independent Commissioner	AGMS February 20, 2020	2020-2025
6	Erwin Rijanto Slamet	Independent Commissioner	AGMS March 29, 2021	2021-2026

The Bank always pays attention to the individual criteria that Independent Commissioners must fulfill, especially regarding the requirements and criteria for Independent Commissioners as further regulated through other applicable laws and regulations, in particular:

1. Law no. 40 of 2007 concerning Limited Liability Companies as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law, which regulates that:
   a. The Company's Articles of Association may regulate the existence of 1 (one) or more independent commissioners and 1 (one) delegate commissioner; and
   b. Independent commissioners are appointed based on GMS resolutions from parties who are not affiliated with the major shareholders, members of the Board of Directors, and/or other members of the Board of Commissioners.

2. Financial Services Authority Regulation No. 33/POJK.04/2014 dated December 8, 2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Independent Commissioner of Public Companies, which regulates that:
   a. Independent Commissioners are members of the Board of Commissioners who come from outside the Issuer or Public Company and fulfill the requirements as Independent Commissioners as referred to in the POJK;
   b. Independent Commissioners must fulfill the following requirements:
      i. Not a person who works or has the authority and responsibility to plan, lead, control or supervise the activities of an Issuer or Public Company within the last 6 (six) months, except for reappointment as an Independent Commissioner of an Issuer or Public Company in the following period;

ii. Does not own shares, either directly or indirectly, in the Issuer or Public Company;
iii. Does not have affiliation with the Issuer or Public Company, member of the Board of Commissioners, member of the Board of Directors, or major shareholder of the Issuer or Public Company; and

c) Does not have any direct or indirect business relationships related to the business activities of the Issuer or Public Company.

3. Financial Services Authority Regulation No. 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks, which regulates that:
   a) Candidates for Independent Commissioners must have:
      i. Knowledge in the banking sector that is adequate and relevant to the position as Independent Commissioner; and
      ii. Experience in banking and/or finance.
   b) Former members of the Board of Directors or Executive Officers of the Bank or parties who have a relationship with the Bank who may influence the person's ability to act independently must undergo a cooling-off period of at least 1 year before becoming an Independent Commissioner at the Bank concerned.
   c) Non-Independent Commissioners can change to become Independent Commissioners at the Bank or bank business group concerned by fulfilling the requirements as an Independent Commissioner.
   d) Non-Independent Commissioners who will transition to become Independent Commissioners at the Bank concerned are required to undergo a cooling-off period of at least 1 (one) year.
   e) The transition from Non-Independent Commissioner to Independent Commissioner must obtain OJK approval through a fit and proper test in accordance with POJK regarding fit and proper tests for financial services institutions.

4. Financial Services Authority Circular No. 13/SEOJK.03/2017 dated March 17, 2017 concerning the Implementation of Governance for Commercial Banks, which regulates that:
   a) Independent Commissioners are members of the Board of Commissioners who do not have financial relationships, management relationships, ownership relationships, and/or familial relationships with members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders, or relationships with the Bank that could affect their ability to act independently;
   b) The definition of having financial relationships, management relationships, ownership relationships, and/or familial relationships with members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders, or relationships with banks that can influence the ability to act non-independently, is referred to as guided by the definition, which is regulated in the applicable laws and regulations, in particular the Financial Services Authority Circular Letter concerning the Implementation of Governance for Commercial Banks.

5. Financial Services Authority Circular No. 28/SEOJK.03/2022 dated December 22, 2022 concerning Risk Management Certification for Commercial Bank Human Resources, which regulates that Ownership of a Risk Management Certificate is one aspect of assessing competency factors in assessing the ability and suitability of prospective members of the Board of Directors and prospective members of the Board of Commissioners in accordance with provisions of the Financial Services Authority regarding the fit and proper test for the main parties of financial services institutions.

Statement of Independence of Independent Commissioners

In line with the provisions of Article 25 paragraph (1) OJK Regulation no. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, BNI ensures that all Independent Commissioners in office have fulfilled the independence requirements as evidenced by the absence of financial, management, share ownership, and/or familial relationships with members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders, or relationships with other companies that may affect the person's ability to act independently. The following is a statement of independence from each Independent Commissioner:

Name	Has no financial relationship with the Board of Commissioners and Directors	Has No Management Relationship in BNI, Subsidiary, or Affiliated Companies	Has no Share Ownership Relationship in BNI	No Family Relationship with the Board of Commissioners, Board of Directors, and/or Fellow Members of the Nomination and Remuneration Committee
Pradjoto	✓	✓	✓	✓
Sigit Widyawan	✓	✓	✓	✓
Asmawi Syam	✓	✓	✓	✓
Iman Sugema	✓	✓	✓	✓
Septian Hario Seto	✓	✓	✓	✓
Erwin Rijanto Slamet	✓	✓	✓	✓

Each member of the Independent Commissioner makes a statement of independence, and this has been submitted to the OJK as one of the requirements to be able to take part in the fit and proper test process at the OJK. In 2024, the Independent Commissioners serving are as follows:

INDEPENDENCE ATTACHMENT

Attachment to the Statement of Independence of the Independent Commissioner

1. Pradjoto



2. Sigit Widyawan



3. Asmawi Syam



4. Iman Sugema



5. Septian Hario Seto



6. Erwin Rijanto Slamet



Board of Directors

The Board of Directors is the primary governing body within BNI's governance structure, collectively carrying out its duties and assuming full responsibility for the management and administration of the Bank in line with its interests and objectives. The Board ensures the smooth execution of the Bank's business activities and represents the Bank both within and outside the courts, in accordance with the provisions of the Bank's Articles of Association. Each member of the Board of Directors performs their duties based on assigned roles and authorities to enhance management effectiveness and maximize outcomes. Furthermore, every member must fulfill their duties and responsibilities with integrity and good faith, adhering to the Bank's Articles of Association and all applicable laws and regulations in Indonesia

In relation to GCG practices, the Board of Directors plays a key role in the successful implementation of GCG principles within the Bank's internal scope. With the assistance of supporting organs under it, the Board of Directors ensures that GCG principles have been applied consistently in every aspect of BNI's business processes and always upholds a professional, objective, strategic-minded attitude and prioritizes the Bank's interests in all actions or strategic steps taken. The Board of Directors is accountable for the implementation of its duties and responsibilities to shareholders at the GMS.

LEGAL BASIS

The formation and appointment of the BNI Board of Directors is guided by several provisions, including:

1) Law No. 40 of 2007 concerning Limited Liability Companies as amended by Law No. 6 of 2023 concerning Stipulation of Government Regulations in Lieu of Law No. 2 of 2022 concerning Job Creation becomes law;
2) Financial Services Authority Regulation No. 33/POJK.04/2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Public Companies;
3) Regulation of the Minister of SOE Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
4) Regulation of the Minister of SOE Number PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises
5) Bank Articles of Association
6) The Board of Directors' Decree Number KP/339/DIR dated August 6, 2024, concerning the Charter of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk

BOARD OF DIRECTORS CHARTER [ACGS D.1.1]

BNI has written work guidelines that are binding and must be adhered to by all members of the Board of Directors in carrying out their duties and responsibilities. The Board of Directors' Charter was ratified through BNI Board of Directors' Decree No. KP/339/DIR dated August 6, 2024. In general, this Board of Directors Charter contains and regulates matters relating to General Provisions, Accountability and Responsibility of the Board of Directors, Number of Composition and Independence of the Board of Directors, Code of Ethics and Behavior for the Board of Directors, Requirements for Members of the Board of Directors, Contract Signing Management of members of the Board of Directors, Procedures for Appointing Members of the Board of Directors, Dismissal of Members of the Board of Directors, Resignation of Members of the Board of Directors, End of Term of Office of Members of the Board of Directors, Company Management Policy by the Board of Directors, Division of Duties and Authority of the Board of Directors, Regulation of Authority and Decision Procedures of the Board of Directors, Duties, Authority, and Responsibilities of the Board of Directors, Actions of the Board of Directors, which must obtain Written Approval from the Board of Commissioners, Actions of the Board of Directors, which must obtain Approval from the GMS, Actions that Can Only Be Done by the Board of Directors After Obtaining a Written Response from the Board of Commissioners and Obtaining Approval from the GMS, Board of Directors Meeting, Annual Management Contract and Main Performance Indicators, the Board of Directors' Remuneration, the Board of Directors' Succession Policy, Income for Concurrent Positions, Working Relationship between Board of Directors and Board of Commissioners, Work Hours, Leave for the Board of Directors Member, Company Induction Program, Competency Improvement of the Board of Directors, Transparency Aspects of the Board of Directors, Prohibition of Taking Personal Profits and Conflicts of Interest.

The Board of Directors' Charter is reviewed periodically based on applicable regulations, international best practices, and best governance practices. If necessary, the Board of Directors Charter can be updated in accordance with regulatory developments and the Bank's business dynamics, with the approval of all members of the Board of Directors. The Board of Directors Charter was updated on August 6, 2024, and uploaded to the Bank's website.

CRITERIA OR QUALIFICATIONS OF THE BOARD OF DIRECTORS [ACGS D.3.9, D.3.11]

In the nomination or succession process for the Board of Directors, the Bank is obliged to pay attention to the criteria or qualifications of prospective members of the Board of Directors as regulated in the BNI Board of Directors' Work Guidelines and Procedures. The Bank ensures that all serving members of the Board of Directors have the required skills and expertise, as well as a time commitment to the Company, in order to achieve the goals and best interests of the Bank. A person can be appointed as a BNI Board of Director if deemed capable of carrying out legal actions and has at least fulfilled the following requirements:

Criteria or Requirement	Royke Tumilaar	Putrama Wahju Setyawan	Novita Widya Anggraini	Corina Leyla Kamalies	David Pirzada	Ronny Venir	Mucharom	Toto Prasetio	I Made Sukajaya	Hussein Paolo Kartadjoemena	Agung Prabowo	Munadi Herlambang*
1. Integrity, at least including:												
a) Proficient in performing legal actions in the 5 (five) years before appointment and during their term of office: • Has never been declared bankrupt; or • Has never been a member of the Board of Directors or a member of the Board of Commissioners found guilty of causing a company to be declared bankrupt based on a court decision.	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
b) Has good character and morals;	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
c) Has the commitment to comply with prevailing laws and regulations;	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
d) Has the commitment to develop sound Bank operations;	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
e) Has not been included in the list of those failing to pass the fit and proper test;	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
f) Has a commitment to not take and/or repeat certain actions and/or actions, for candidates for members of the Board of Directors or candidates for members of the Board of Commissioners who have not passed the fit and proper test and have undergone sanctions;.	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

Criteria or Requirement	Royke Tumilaar	Putrama Wahju Setyawan	Novita Widya Anggraini	Corina Leyla Karnalies	David Pirzada	Ronny Venir	Mucharom	Toto Prasetio	I Made Sukajaya	Hussein Paolo Kartadjoemena	Agung Prabowo	Munadi Herlambang*
2. Competencies, at least including:												
a) Sufficient knowledge in banking relevant to the position;	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
b) Has the experience and expertise in banking and/ or finance; and	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
c) The ability to carry out strategic management in the context of developing the company and its subsidiaries.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Has a good financial reputation with no bad loans;	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4. Complies with the laws and regulations in the field of Banking, Capital Market, other laws and regulations and the Company's Articles of Association;	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5. Between fellow members of the Board of Directors, and between members of the Board of Directors and members of the Board of Commissioners, it is prohibited to have blood relationship up to the third degree either in a straight line or a sideways line or an affair (son-in-law or brother-in-law).	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6. Time commitment to the company	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

* Has not been effective

TERM OF OFFICE OF THE BOARD OF DIRECTORS [ACGS D.2.5]

As regulated in the Board of Directors' Work Guidelines and Procedures, the longest term of office for the Board of Directors is 2 (two) periods with the following provisions:

1) The Board of Directors members are appointed for a period commencing from the date determined by the GMS that appoints them and ends at the closing of the 5 (fifth) Annual GMS after the date of appointment on condition that it should not exceed a period of 5 (five) years, by observing the laws and regulations in the Capital Market sector, but without reducing the right of the GMS to dismiss at any time any members of the Board of Directors before their term of office ends; and
2) Dismissal is effective from the closing of the GMS, unless otherwise determined by the GMS.

STRUCTURE, NUMBER, AND COMPOSITION OF THE BOARD OF DIRECTORS IN 2024

The number of members of the BNI Board of Directors is based on the need to achieve the goals and objectives and is adjusted to the Bank's conditions, which include the characteristics, capacity, and size of the Bank, as well as paying attention to aspects of the diversity of the composition of the Board of Directors members. The structure, number, and composition of members of the Board of Directors have also been adjusted to achieve effective decision-making and have complied with applicable provisions as regulated in the BNI Board of Directors' Work Guidelines and Procedures, namely:

1) The number of members of the BNI Board of Directors serving as of December 31, 2024, is 12 (twelve) people, consisting of 1 (one) President Director, and 1 (one) Deputy President Director;
2) 1 (one) Director who concurrently serves as Compliance Director and 9 (nine) other Directors;
3) The number of members of the BNI Board of Directors is greater than the number of members of the BNI Board of Commissioners;
4) All members of the BNI Board of Directors are domiciled in Jakarta, Indonesia;
5) The majority of members of the BNI Board of Directors have at least 5 (five) years of experience in the operational field as Bank executive officers;
6) The Board of Directors is led by the President Director, who comes from a party that is independent of the Controlling Shareholders, other members of the Board of Directors, and members of the BNI Board of Commissioners;
7) The replacement and/or appointment of members of the BNI Board of Directors has considered the recommendations of the Nomination and Remuneration Committee and obtained approval from shareholders, including non-controlling shareholders, and obtained OJK approval; [ACGS A.2.2]
8) All members of the BNI Board of Directors do not have familial relationships up to the third degree with fellow members of the Board of Directors and/or Board of Commissioners or Controlling Shareholders; and
9) All members of the BNI Board of Directors have passed the Fit and Proper Test.

In connection with the dismissal, changes in position nomenclature, transfer of duties, and appointment of members of the Board of Directors based on the resolution of the 2024 Annual GMS held on March 4, 2024, the number and composition of the BNI Board of Directors underwent changes with the following description:

January 1, 2024 – March 4, 2024 Period:

In the period January 1, 2024–March 4, 2024, the number of BNI Board of Directors is 12 (twelve) people, consisting of 1 (one) President Director, 1 (one) Deputy President Director, and 10 (ten) Directors.

Board of Directors Composition for the January 1, 2024-March 4, 2024 Period

Name	Position	Domicile	Date of Appointment	Effective Date*
Royke Tumilaar	President Director	Jakarta	September 2, 2020	November 19, 2020
Adi Sulistyowati	Deputy President Director	Jakarta	• March 17, 2015 (Appointed as Institutional Relations Director) • September 2, 2020 (Transfer to Deputy President Director)	• May 22, 2015 • November 6, 2020
Novita Widya Anggraini	Finance Director	Jakarta	September 2, 2020	November 19, 2020
Corina Leyla Karnalies	Digital and Integrated Transaction Banking Director	Jakarta	February 20, 2020	June 26, 2020
Sis Apik Wijayanto	Enterprise and Commercial Banking Director	Jakarta	February 20, 2020	June 26, 2020
David Pirzada	Risk Management Director	Jakarta	September 2, 2020	December 1, 2020
Silvano Winston Rumantir	Wholesale and International Banking Director	Jakarta	September 2, 2020	December 1, 2020
Ronny Venir	Network and Services Director	Jakarta	September 2, 2020	November 6, 2020
Muhammad Iqbal	Institutional Banking Director	Jakarta	September 2, 2020	November 19, 2020
Putrama Wahju Setyawan	Retail Banking Director	Jakarta	August 31, 2022	December 23, 2022

Name	Position	Domicile	Date of Appointment	Effective Date*
Mucharom	Human Capital and Compliance Director	Jakarta	August 31, 2022	January 6, 2023
Toto Prasetio	Technology and Operations Director	Jakarta	August 31, 2022	January 31, 2023

* The Board of Directors is effective after obtaining OJK Approval on the Fit and Proper Test. This is in accordance with OJK regulation No. 27/POJK.03/2016 dated July 22, 2016 concerning Fit and Proper Test for Key Parties of Financial Services Institutions.

March 4, 2024 – December 31, 2024 Period

In the period March 4, 2024–December 31, 2024, there were changes to the composition and transfer of assignments of members of the Board of Directors in accordance with the 2024 Annual GMS, which was held on March 4, 2024. With these changes, the structure and composition of the BNI Board of Directors with the new nomenclature are as follows:

Board of Directors Composition for the March 4, 2024–December 31, 2024 Period

Name	Position	Domicile	Date of Appointment	Effective Date*
Royke Tumilaar	President Director	Jakarta	September 2, 2020	November 19, 2020
Putrama Wahju Setyawan	Deputy President Director	Jakarta	• August 31 2022 (Appointed as Retail Banking Director) • March 4, 2024 (Transfer to Deputy President Director)	• December 23, 2022 • September 2, 2024
Novita Widya Anggraini	Finance Director	Jakarta	September 2, 2020	November 19, 2020
Corina Leyla Karnalies	Retail Banking Director	Jakarta	February 20, 2020	June 26, 2020
David Pirzada	Risk Management Director	Jakarta	September 2, 2020	December 1, 2020
Ronny Venir	Network and Services Director	Jakarta	September 2, 2020	November 6, 2020
Mucharom	Human Capital and Compliance Director	Jakarta	August 31, 2022	January 6, 2023
Toto Prasetio	Technology and Operations Director	Jakarta	August 31, 2022	January 31, 2023
I Made Sukajaya	Enterprise and Commercial Banking Director	Jakarta	March 4, 2024	September 2, 2024
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Jakarta	March 4, 2024	September 2, 2024
Agung Prabowo	Wholesale and International Banking Director	Jakarta	March 4, 2024	October 9, 2024
Munadi Herlambang**	Institutional Banking Director	Jakarta	March 4, 2024	Has not been effective

* The Board of Directors is effective after obtaining OJK Approval on the Fit and Proper Test. This is in accordance with OJK regulation No. 27/POJK.03/2016 dated July 22, 2016 concerning Fit and Proper Test for Key Parties of Financial Services Institutions.
** Has not been effective

Referring to the composition of the Board of Directors as of December 31, 2024, according to the table above, it can be seen that BNI has 2 (two) female Directors who have the capacity and abilities in their fields, namely: [ACGS (B).D.1.1]

- Novita Widya Anggraini: Finance Director
- Corina Leyla Karnalies: Retail Banking Director

In addition to encouraging the leadership and role of women at the top management level, BNI also ensures the independence of the Board of Directors in their work, as evidenced by the fact that no Director has served more than two terms of five years each in the same capacity. More detailed disclosure regarding the career history of each Director can be seen in the Company Profile Chapter, under the Board of Directors' Profile sub-chapter of this 2024 Annual Report.

BASIS FOR APPOINTMENT OF MEMBERS OF THE BOARD OF DIRECTORS

The mechanism for appointing and dismissing members of the Board of Directors is carried out by the GMS in accordance with the provisions of Article 11, paragraph (10) of the Bank's Articles of Association. The appointment of each member of the Board of Directors can be seen in the table below:

No.	Name	Position	Basis for Appointment	Position Period
1	Royke Tumilaar	President Director	EGMS on September 2, 2020	2020-2025
2	Putrama Wahju Setyawan	Deputy President Director	EGMS on August 31, 2022, then reassigned as Deputy President Director at AGMS on March 4, 2024.	2022-2027
3	Novita Widya Anggraini	Finance Director	EGMS on September 2, 2020	2020-2025
4	Corina Leyla Karnalies	Retail Banking Director	EGMS on February 20, 2020	2020-2025
5	David Pirzada	Risk Management Director	EGMS on September 2, 2020	2020-2025
6	Ronny Venir	Network and Services Director	EGMS on September 2, 2020	2020-2025
7	Mucharom	Human Capital and Compliance Director	EGMS on August 31, 2022	2022-2027
8	Toto Prasetio	Technology and Operations Director	EGMS on August 31, 2022	2022-2027
9	I Made Sukajaya	Enterprise and Commercial Banking Director	AGMS decision on March 4, 2024	2024-2029
10	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	AGMS decision on March 4, 2024	2024-2029
11	Agung Prabowo	Wholesale and International Banking Director	AGMS decision on March 4, 2024	2024-2029
12	Munadi Herlambang*	Institutional Banking Director	AGMS decision on March 4, 2024	2024-2029

* Has not been effective

Based on the disclosure table above, it can be seen that the BNI Board of Directors is led by the President Director and does not have an Independent Director because it adheres to the two-board system principle so that the role of the Independent Director is transferred to the Deputy President Director. The procedures for selecting and appointing the BNI Board of Directors refer to the Board of Director Succession Policy that applies within BNI. As of December 31, 2024, there were no Directors who had previously served as President Director of BNI within the last 2 years. [ACGS D.4.3, D.4.5]

MECHANISM FOR APPOINTMENT, DISMISSAL, AND RESIGNATION OF THE BOARD OF DIRECTORS [ACGS D.3.10]

Procedures for the dismissal and resignation of the Board of Directors are regulated in the Bank's Articles of Association, Board of Directors' Charter, and also refer to the provisions of POJK No. 33/POJK.04/2014 and POJK No. 15/POJK.04/2020, namely:

1) The GMS may dismiss members of the Board of Directors at any time by stating the reasons.
2) The reasons for dismissing a member of the Board of Directors is based on fact that the concerned member of the Board of Directors:
   a. Did not perform/under performed in fulfilling the obligations agreed upon in the management contract.
   b. Did not perform their duties properly.
   c. Violated the provisions of Articles of Association and/or laws and regulations.
   d. Engaged in actions that harmed the Company and/or the State
   e. Committed actions that violated ethics and/or properness that must be upheld as Board of Directors.
   f. Convicted by a Court decision that has permanent legal force.
   g. Resigned.
   h. Other reasons considered appropriate by the GMS in the interests and objectives of the Company.

3) A decision for dismissal shall be made after the related person has had the opportunity to defend themself, except for reasons as referred to in item 2 letter f and g.
4) Dismissal for reasons as referred to in item 2, letter d and f shall constitute dishonorable dismissal.
5) A member of the Board of Directors may resign from their post before their term of office expires. In this matter, the member of the Board of Directors who resigns must submit a resignation request to the Company.
6) BNI must convene a GMS to resolve the resignation proposal of members of the Board of Commissioners no longer than 90 (ninety) days after receipt of the resignation letter.
7) Members of the Board of Directors who resign before or after their term of office ends, unless due to death, the person concerned shall still be responsible to submit accountability for actions not yet received by the GMS.
8) Members of Board of Directors may be dismissed temporarily by the Board of Commissioners by stating the reasons in the event that such a member acts in contrary to the Articles of Association or there is an indication of doing an action that harms the Company or is neglect in performing obligations or there are compelling reasons for the Company by considering the following provisions:
    a. Such temporary dismissal shall be notified in writing to the concerned member of the Board of Directors together with the reasons causing such action with a copy to the Board of Directors;
    b. The notification as referred to in item 8 letter a shall be delivered no later than 2 (two) business days after the determination of such temporary dismissal;
    c. The temporarily dismissed member of the Board of Directors is not authorized to perform Company management in the Company's interest in accordance with the Company's purposes and objectives nor represent the Company, either inside or outside court;
    d. Within a period of no later than 90 (ninety) days after such temporary dismissal, the Board of Commissioners shall convene a GMS to withdraw or enforce such temporary dismissal resolution;
    e. In the event that the time period to convene the GMS as referred to in item 8 letter d has passed or the GMS cannot adopt a resolution, then such temporary dismissal shall become void
    f. The limitation of authority in item 8 letter c shall be effective from the decision of temporary dismissal by the Board of Commissioners until:
    g. There is a GMS decision confirming or revoking the temporary dismissal in item 8 letter d; or
    h. The time period in item 8 letter d has passed.
    i. In the GMS as referred to in item 8 letter d, the related members of the Board of Directors are given an opportunity to defend themselves.
    j. Such temporary dismissals cannot be extended or reestablished for the same reasons, in the event that such temporary dismissal is declared void as referred to in item 8 letter e.
    k. In the event that the GMS cancels a temporary dismissal or there are circumstances as referred to in item 8 letter e, then the related member of the Board of Directors must resume their duties properly.
    l. In the event that the GMS reaffirms the temporary dismissal resolution, then the related member of the Board of Directors shall be dismissed going forward.
    m. In the event that the temporary dismissed member of the Board of Directors is not present at the GMS after being summoned in writing, then the temporary dismissed member of the Board of Directors shall be deemed not to have exercised their right to defend themself in the GMS and has accepted the GMS resolution.

FIT AND PROPER ASSESSMENT

The appointment of members of the BNI Board of Directors is effective after obtaining approval from the Financial Services Authority for the Fit and Proper Test in accordance with POJK No. 27/POJK.03/2016 concerning Capability and Conformity Assessment for Main Parties of Financial Services Institutions and compliance with applicable laws and regulations. In order to be able to take part in the Fit and Proper Test process, the Bank submits an application to the Financial Services Authority to obtain approval for prospective members of the Board of Directors. Every prospective member of the Board of Directors is required to obtain approval from the OJK before carrying out their actions, duties, and functions as a member of the Board of Directors. The following is a list of members of the Bank's Board of Directors who have passed the Fit and Proper Test without records and have received approval from the OJK:

Fit and Proper Test

No.	Name	Position	Organizer	Result	OJK Approval Letter No.	Effective Date
1	Royke Tumilaar	President Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. 82/KDK.03/2020	November 19, 2020
2	Putrama Wahju Setyawan	Deputy President Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. KEP-103/D.03/2024	September 2, 2024
3	Novita Widya Anggraini	Finance Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. 83/KDK.03/2020	November 19, 2020
4	Corina Leyla Karnalies	Retail Banking Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. 37/KDK.03/2020	June 26, 2020
5	David Pirzada	Risk Management Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. 86/KDK.03/2020	December 1, 2020
6	Ronny Venir	Network and Services Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. 79/KDK.03/2020	November 6, 2020
7	Mucharom	Human Capital and Compliance Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. KEP-1/D.03/2023	January 6, 2023
8	Toto Prasetio	Technology and Operations Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. KEP-13/D.03/2024	January 31, 2023
9	I Made Sukajaya	Enterprise and Commercial Banking Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. KEP-101/D.03/2024	September 2, 2024
10	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. KEP-102/D.03/2024	September 2, 2024
11	Agung Prabowo	Wholesale and International Banking Director	Otoritas Jasa Keuangan	Passed	OJK Board of Commissioners Decree No. KEPR-120/D.03/2024	October 9, 2024
12	Munadi Herlambang*	Institutional Banking Director	Otoritas Jasa Keuangan	On Process	Has not been effective	Has not been effective

* Has not been effective

DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS [ACGS D.1.3]

The Board of Directors has duties, responsibilities, and authority regarding the management and administration of the Bank for the interests of the Bank and in order to achieve the Bank's goals and objectives as stipulated in the Articles of Association and applicable laws and regulations. The Board of Directors is also responsible for representing the Bank both inside and outside the court regarding all matters and all events with restrictions as regulated in statutory regulations, the Articles of Association, and/or GMS Resolutions. The description of the duties and responsibilities of the Board of Directors is regulated in detail in the Board of Directors' Work Guidelines and Procedures, which have been uploaded on the BNI website.

DIVISION OF DUTIES AND RESPONSIBILITIES OF EACH MEMBER OF THE BOARD OF DIRECTORS [ACGS D.1.3]

In order to ensure that the management of the Bank can run more effectively and efficiently, each member of the Board of Directors carries out the main duties and full authority over the implementation and management of the Bank individually in accordance with their field of expertise and professional work experience. The scope of work and responsibilities of each member of the Board of Directors refers to the Board of Directors' Decree regarding Organizational Arrangement.

Throughout the period January 1, 2024, to March 4, 2024, the division of duties of the Board of Directors is regulated based on the Board of Directors' Decree Number KP/132/DIR/R dated April 6, 2023. Meanwhile, after changes have been made to the composition and nomenclature of the Board of Directors based on the resolution of the 2024 Annual GMS for the 2023 Financial Year, which was held on March 4, 2024, then for the period March 4, 2024, to December 31, 2024, the division of duties of the Board of Directors is regulated based on the Board of Directors' Decree Number KP/235/DIR/R dated June 7, 2024.

The following is the division of the main duties and authorities of each member of the BNI Board of Directors throughout 2024:

Division of Duties and Responsibilities of the Board of Directors for the period January 1, 2024 – March 4, 2024

No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities [ACGS D.4.4]
1	Royke Tumilaar	President Director	Directorate/SEVP: 1) Deputy President Director 2) Wholesale & International Banking Director 3) Enterprise & Commercial Banking Director 4) Institutional Banking Director 5) Network & Services Director 6) Human Capital & Compliance Director 7) Finance Director 8) SEVP Corporate Development & Transformation Division/Unit/Functional Unit: 1) Internal Audit Unit 2) Corporate Secretary Division SEVP Corporate Development & Transformation directly supervises Division/Unit/ Functional Unit: 1) Corporate Development & Transformation Division 2) Strategic Project	Lead and direct, control, and be responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) To lead, supervise, and coordinate all business and operational activities of the company assisted by the Deputy President Director. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) To chair all Board of Directors meetings. (AA Article 13 Paragraph (7)). 4) Sign each share certificate, collective share certificate, convertible bond, warrant, and/or other securities that can be converted into shares together with the President Commissioner. (AA Article 6 Paragraph (6)). 5) To lead, supervise, and coordinate all activities related to the Internal Audit Organization and Corporate Secretary Organization (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023).
2	Adi Sulistyowati	Deputy President Director	Directorate/SEVP: 1) Retail Banking Director 2) Risk Management Director 3) Technology & Operations Director 4) Digital & Integrated Transactions Banking Director	To lead and direct, control, and be responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI business and operational activities (Board of Director's Decree No. KP/132/ DIR/R dated April 6, 2023). 3) If the President Director is absent or unavailable, the Deputy President Director will chair the Board of Directors Meeting.

No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities [ACGS D.4.4]
3	Novita Widya Anggraini	Finance Director	Division/Unit/Functional Unit: 1) Corporate Planning & Performance Management Division 2) Accounting Division 3) Procurement & Fixed Assets Division 4) Investor Relations Division 5) Subsidiaries Division Management 6) Office of Chief Economist Division 7) Data Management & Analytics Division	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI Financial activities (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities and Organizations of Corporate Planning & Performance Management, Accounting Organizations, Procurement & Fixed Assets Organizations, Investor Relations Organizations, Subsidiaries Management Organizations, Office of Chief Economist Organizations, and Data Management & Analytics Organizations (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 4) Become Director of Regional Development Office 10 (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Development for Subsidiary Company - Bank Mayora (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 6) Become Director of Overseas, New York Branch (CDV Memo No. CDV/2/552 dated March 16, 2023).
4	Corina Leyla Karnalies	Digital and Integrated Transaction Banking Director	Directorate/SEVP: SEVP Retail Digital Solutions Division/Unit/Functional Unit: 1) Wholesale Transaction Product & Partnership Division 2) Wholesale Digital Channel Division 3) Marketing Communications Division SEVP Retail Digital Solutions directly supervises Division/ Unit/Functional Unit: 1) Retail Digital Product & Partnership Division 2) Retail Digital Channel Division	Under the supervision of the Deputy President Director, leads and directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the Deputy President Director in leading, supervising, and coordinating all BNI Digital & Integrated Transaction Banking activities, including Retail Digital Solutions (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to the Wholesale Transaction Product & Partnership Organization, Wholesale Digital Channel Organization, Marketing Communications Organization, Retail Digital Product & Partnership Organization, and Retail Digital Channel Organization (Board of Directors' Decree Dir No. KP/132/DIR/R April 6, 2023). 4) Become Director of Development for Regional Office 18 and Regional Office 08 (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Overseas, Singapore Branch (CDV Memo No. CDV/2/552 dated March 16, 2023).
5	Sis Apik Wijayanto	Enterprise and Commercial Banking Director	Division/Unit/Functional Unit: 1) Enterprise Banking Division 2) Commercial Banking 1 Division 3) Commercial Banking 2 Division 4) Senior Business Executive	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI Enterprise & Commercial Banking activities. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Leading, supervising, and coordinating all activities and Organizations of Enterprise Banking, Commercial Banking Organization 1, Commercial Banking Organization 2, and Senior Business Executives (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 4) Become Director of Development for Regional Office 01 and Regional Office 07. (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Development for Subsidiary Company - BNI Multifinance (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023).

No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities [ACGS D.4.4]
6	David Pirzada	Risk Management Director	Directorate/SEVP: 1) SEVP Credit Risk 2) SEVP Remedial & Recovery Division/Unit/Functional Unit: 1) Enterprise Risk Management Division 2) Operational Risk Management Division 3) Retail Credit Risk Division 4) Anti Fraud Unit 5) Senior Credit Risk Executive SEVP Credit Risk directly supervises Division/Unit/Functional Unit: 1) Corporate & Enterprise Credit Risk Division 2) Commercial Credit Risk Division SEVP Remedial & Recovery directly supervises Division/Unit/Functional Unit: 1) Corporate Remedial & Recovery Division 2) Enterprise & Commercial Remedial & Recovery Division 3) Retail Collection & Recovery Division	Under the supervision of the Deputy President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the Deputy President Director in leading, supervising, and coordinating all BNI Risk Management activities, including Credit Risk and Remedial & Recovery. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to Enterprise Risk Management Organizations, Operational Risk Management Organizations, Retail Credit Risk Organizations, Anti-Fraud Organizations, Corporate & Enterprise Credit Risk Organizations, Commercial Credit Risk Organizations, Corporate Remedial & Recovery Organizations, Enterprise Organizations & Commercial Remedial & Recovery, Retail Collection & Recovery Organizations, and Senior Credit Risk Executive (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 4) Become Director of Development for Regional Office 11 and Regional Office 03 (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Overseas, London Branch and Amsterdam Rep. Office (CDV Memo No. CDV/2/552 dated March 16, 2023).
7	Silvano Winston Rumantir	Wholesale and International Banking Director	Directorate/SEVP: 1) SEVP Corporate Banking 2) SEVP Treasury Division/Unit: 1) Corporate Banking 1 Division 2) Corporate Banking 2 Division 3) Syndication & Structured Finance Division 4) International & Financial Institutions Division 5) Senior Business Executive 6) SORX Wholesale Banking 7) Overseas Branch SEVP Corporate Banking directly supervises Division/Unit/Functional Unit: 1) Corporate Banking 3 Division 2) Corporate Banking 4 Division SEVP Treasury directly supervises Division/Unit/Functional Unit: Treasury Division	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI Wholesale and International Banking activities. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities and Corporate Banking Organization 1, Corporate Banking Organization 2, Corporate Banking Organization 3, Corporate Banking Organization 4, Treasury Organization, Syndication & Structured Finance Organization, International Banking & Financial Institution Organization, Senior Business Executive, SORX Wholesale Banking, and Overseas Branch. 4) Become Director of Development for Regional Office 12 and Regional Office 06 (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Development for Subsidiary Companies - BNI Sekuritas and BNI Remittance (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023).

No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities [ACGS D.4.4]
8	Ronny Venir	Network and Services Director	Division/Unit/Functional Unit: 1) Distribution Network & Sales Division 2) Agen46 Division 3) Customer Experience Center Division 4) SORX Network & Services 5) Regional Office 01-17	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI Network & Services activities. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to the Distribution Network & Sales Organization, Agen46 Organization, Customer Experience Center Organization, and SORX Network & Services (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 4) In charge and supervise all BNI Regional Offices (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 5) Become Director of Overseas, Hong Kong Branch (CDV Memo No. CDV/2/552 dated March 16, 2023). 6) Become Director of Guidance for Subsidiary Company - BNI Life Insurance. (CDV Memo No. CDV/2/552 dated March 16, 2023).
9	Muhammad Iqbal	Institutional Banking Director	Division/Unit/Functional Unit: 1) Institutional Banking 1 Division 2) Institutional Banking 2 Division 3) Pension Fund Division	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI Institutional Banking activities. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to Institutional Banking Organization 1, Institutional Banking Organization 2, and Pension Fund Organization (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 4) Become Director of Development for Regional Office 14 and Regional Office 05. (CDV Memo No. CDV/2/552 dated March 16, 2023).
10	Putrama Wahju Setyawan	Retail Banking Director	Directorate/SEVP: SEVP Wealth Management Division/Unit/Functional Unit: 1) Consumer Segment Division 2) Consumer Product Division 3) Card Business Division 4) Retail Productive Banking Division 5) Business Program Division 6) SORX Consumer Banking & Corporate Function SEVP Wealth Management directly supervises Division/Unit/Functional Unit: Wealth Management Division	Under the supervision of the Deputy President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the Deputy President Director in leading, supervising, and coordinating all Retail Banking activities. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to the Wealth Management Organization, Consumer Segment Organization, Consumer Product Organization, Card Business Organization, Retail Productive Banking Organization, Business Program Organization, and SORX Consumer Banking & Corporate Function (Board of Directors' Decree No. KP/132/DIR/R dated April6, 2023). 4) Become Director of Development for Regional Office 16 and Regional Office 04 (CDV Memo No. CDV/2/552 dated March 16, 2023).

No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities [ACGS D.4.4]
11	Mucharom	Human Capital and Compliance Director	Division/Unit/Functional Unit: 1) Human Capital Strategy Division 2) Human Capital Services Division 3) BNI University 4) Compliance Division 5) Legal Division 6) Policy Governance Division 7) HC Business Partner	Under the supervision of the President Director, leads and directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all business and operational activities of the company assisted by the Deputy President Director. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to the Human Capital Strategy Organization, Human Capital Services Organization, BNI University Organization, Compliance Organization, Legal Organization, Policy Governance Organization, and Human Capital Business Partner (Board of Directors' Decree No. KP/132/DIR/R April 6, 2023). 4) Become Director of Development for Regional Office 02 and Regional Office 17 (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Overseas Development, Tokyo Branch (CDV Memo No. CDV/2/552 dated March 16, 2023).
12	Toto Prasetio	Technology and Operations Director	Directorate/SEVP: 1) SEVP Information Technology 2) SEVP Operations Division/Unit/Functional Unit: 1) IT Strategy & Architecture Division 2) CISO Division 3) Operations Strategy & Development Division 4) SORX Technology, Digital, & Operations SEVP Information Technology directly supervises Division/ Unit/Functional Unit: 1) Wholesale Digital Delivery Division 2) Retail Digital Delivery Division 3) Application Development Division 4) IT Application Services Division 5) IT Infrastructure Management Division SEVP Operations directly supervises Division/Unit/ Functional Unit: 1) Banking Operations Division 2) Digital Operations Division 3) Credit Operations Division	Under the supervision of the Deputy President Director, leads and directs, controls, and is responsible in accordance with its authority in terms of: 1) Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2) Assist the Deputy Main Director in leading, supervising, and coordinating all BNI Technology & Operations activities. (Board of Director's Decree No. KP/132/DIR/R dated April 6, 2023). 3) Lead, supervise, and coordinate all activities related to the IT Strategy & Architecture Organization, CISO Organization, Operations Strategy & Development Organization, Wholesale Digital Delivery Organization, Retail Digital Delivery Organization, Application Development Organization, IT Application Services Organization, IT Infrastructure Management Organization, Banking Operations Organization, Digital Operations Organization, Credit Operations Organization, and SORX Technology, Digital & Operations (Board of Directors' Decree No. KP/132/DIR/R dated April 6, 2023). 4) Become Director of Development for Regional Office 09 and Regional Office 15 (CDV Memo No. CDV/2/552 dated March 16, 2023). 5) Become Director of Development for Subsidiary Companies - BNI Venture Capital (CDV Memo No. CDV/2/552 dated March 16, 2023). 6) Become Director of Guidance Overseas, Seoul Branch (CDV Memo No. CDV/2/552 dated March 16, 2023).

In addition to dismissing old members of the Board of Directors and appointing new members of the Board of Directors, the resolution of the 2023 Annual GMS held on March 4, 2024, also stipulates the transfer of assignments of members of the Board of Directors as follows:

No.	Name	Previously Served	Currently Serving
1	Putrama Wahju Setyawan	Retail Banking Director	Deputy President Director
2	Corina Leyla Karnalies	Digital and Integrated Transaction Banking Director	Retail Banking Director

With the transfer of duties of members of the Board of Directors, the division of duties and assignments of the Board of Directors will be as follows:

Duties and Responsibilities of the Board of Directors for March 4, 2024–December 31, 2024 Period

No.	Name	Position	Direct Supervision of Director/SEVP/Division	Scope of Work and Responsibilities
1	Royke Tumilaar	President Director	Directorate/SEVP: 1) Deputy President Director 2) Wholesale & International Banking Director 3) Enterprise & Commercial Banking Director 4) Institutional Banking Director 5) Digital & Integrated Transactions Banking Director 6) Human Capital & Compliance Director 7) Finance Director Division/Unit/Functional Unit: 1) Internal Audit Unit 2) Corporate Secretary Division	To lead, guide, oversee, and take responsibility within the scope of their authority in the following matters: 1) The implementation of the duties, authorities, and obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) To lead, supervise, and coordinate all business and operational activities of the company, assisted by the Deputy President Director. (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3) To chair all Board of Directors meetings. (Article 13 Paragraph (7)). 4) To sign each share certificate, collective share certificate, convertible bond, warrant, and/or other securities convertible into shares jointly with the President Commissioner. (Articles of Association, Article 6, Paragraph (6). 5) To lead, supervise, and coordinate all activities related to the Internal Audit Organization and the Corporate Secretary Organization. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024).
2	Putrama Wahju Setyawan	Deputy President Director	Directorate/SEVP: 1) Retail Banking Director 2) Risk Management Director 3) Technology & Operations Director 4) Network & Services Director Division/Unit/Functional Unit: 1) Pension Fund Division	To lead, direct, control, and be responsible within the scope of their authority in the following matters: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assisting the President Director in leading, supervising, and coordinating all BNI business and operational activities (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3) To lead, supervise, and coordinate all activities and the Pension Fund Organization (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 4) In the event that the President Director is absent, the Deputy President Director shall chair the Board of Directors Meeting.
3	Novita Widya Anggraini	Finance Director	Division/Unit/Functional Unit: 1) Corporate Planning & Performance Management Division 2) Accounting Division 3) Procurement & Fixed Assets Division 4) Investor Relations Division 5) Subsidiaries Management Division 6) Office of Chief Economist Division 7) Data Management & Analytics Division	Under the supervision of the President Director, to lead, direct, control, and be responsible within the scope of their authority in the following matters: 1) The implementation of the duties, authorities, and obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assisting the President Director in leading, supervising, and coordinating all financial activities of BNI. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3) To lead, supervise, and coordinate all activities and Organization of Corporate Planning & Performance Management, Accounting Organization, Procurement & Fixed Assets Organization, Investor Relations Organization, Subsidiaries Management Organization, Office of Chief Economist Organization, and Data Management & Analytics Organization (Decree of the Director No. KP/235/DIR/R dated June 7, 2024).

No.	Name	Position	Direct Supervision of Director/SEVP/Division	Scope of Work and Responsibilities
				4) To serve as the Supervising Director of the Regional Office 17 (CDV Memo No. CDV/2/563 dated March 20, 2024). 5) To serve as the Supervising Director of the New York Overseas Branch (CDV Memo No. CDV/2/563 dated March 20, 2024).
4	Corina Leyla Karnalies	Retail Banking Director	Directorate/SEVP: SEVP Wealth Management Division/Unit/Functional Unit: 1) Divisi Consumer Segment Division 2) Consumer Product Division 3) Card Business Division 4) Retail Productive Banking Division 5) Business Program Division 6) SORX Consumer Banking & Corporate Function SEVP Wealth Management directly supervises Division/ Unit/Functional Unit: Divisi Wealth Management	Under the supervision of the Deputy President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assist the Deputy President Director in leading, supervising, and coordinating all Retail Banking activities. (Decree of Director No. KP/235/DIR/R dated June 7, 2024). 3) Supervise SEVP Wealth Management in order to lead, supervise, and coordinate all Wealth Management activities and organizations. 4) Lead, supervise, and coordinate all activities related to the Consumer Segment Organization, Consumer Product Organization, Card Business Organization, Retail Productive Banking Organization, Business Program Organization, and SORX Consumer Banking & Corporate Function (Decree of Director No. KP/235/ DIR/R dated June 7, 2024). 5) To serve as the Supervising Director Regional Office 04 and Regional Office 18 (CDV Memo No. CDV/2/563 dated March 20, 2024). 6) To serve as the Supervising Director of the Subsidiary – BNI Finance. (CDV Memo No. CDV/2/563 dated March 20, 2024).
5	David Pirzada	Risk Management Director	Directorate/SEVP: 1) SEVP Credit Risk 2) SEVP Remedial & Recovery Division/Unit/Functional Unit: 1) Enterprise Risk Management Division 2) Operational Risk Management Division 3) Retail Credit Risk Division 4) Anti Fraud Unit 5) Senior Credit Risk Executive SEVP Credit Risk directly supervises Division/Unit/ Functional Unit: 1) Corporate & Enterprise Credit Risk Division 2) Commercial Credit Risk Division SEVP Remedial & Recovery directly supervises Division/ Unit/Functional Unit: 1) Corporate Remedial & Recovery Division 2) Enterprise & Commercial Remedial & Recovery Division 3) Retail Collection & Recovery Division	Under the supervision of the Deputy President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assisting the Deputy President Director in leading, supervising, and coordinating all BNI Risk Management activities including Credit Risk and Remedial & Recovery. (SK Dir No. KP/235/DIR/R dated June 7, 2024). 3) Supervising SEVP Credit Risk in order to lead, supervise, and coordinate all activities and the Corporate & Enterprise Credit Risk Organization and the Commercial Credit Risk Organization. 4) Supervising SEVP Remedial & Recovery in order to lead, supervise, and coordinate all activities and the Corporate Remedial & Recovery Organization, the Enterprise & Commercial Remedial & Recovery Organization, the Retail Collection & Recovery Organization. 5) To lead, supervise, and coordinate all activities related to the Enterprise Risk Management Organization, Operational Risk Management Organization, Anti-Fraud Organization, and Retail Credit Risk Organization, and Senior Credit Risk Executive (SK Dir No. KP/235/DIR/R dated June 7, 2024). 6) To serve as the Supervising Director of the Regional Office 11 and Regional Office 03 (CDV Memo No. CDV/2/563 dated March 20, 2024). 7) To serve as the Supervising Director of the London Overseas Branch and Amsterdam Representative Office (CDV Memo No. CDV/2/563 dated March 20, 2024).

No.	Name	Position	Direct Supervision of Director/SEVP/Division	Scope of Work and Responsibilities
6	Ronny Venir	Network and Services Director	Division/Unit/Functional Unit: 1) Distribution Network & Sales Division 2) Agen46 Division 3) Customer Experience Center Division 4) SORX Network & Services 5) Regional Office 01-17	Under the supervision of the Deputy President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) To assist the President Director in leading, supervising, and coordinating all BNI Network & Services activities. (Decree of Director No. KP/235/DIR/R dated June 7, 2024). 3) To lead, supervise, and coordinate all activities related to the Distribution Network & Sales Organization, Agen46 Organization, Customer Experience Center Organization, and SORX Network & Services (Decree of Director No. KP/235/DIR/R dated June 7, 2024). 4) Supervise and supervise all BNI Regional Offices (Decree of Director No. KP/235/DIR/R dated June 7, 2024). 5) To serve as the Supervising Director of the Hong Kong Overseas Branch. (CDV Memo No. CDV/2/563 dated March 20, 2024). 6) To serve as the Supervising Director of the Subsidiary–BNI Life. (CDV Memo No. CDV/2/563 dated March 20, 2024).
7	Mucharom	Human Capital and Compliance Director	Directorate/SEVP: SEVP Human Capital Division/Unit/Functional Unit: 1) Human Capital Strategy Division 2) Human Capital Services Division 3) BNI University 4) Compliance Division 5) Legal Division 6) Policy Governance Division 7) HC Business Partner SEVP Human Capital directly supervises Division/Unit/Functional Unit: 1) Human Capital Strategy Division 2) Human Capital Services Division 3) BNI University 4) HC Business Partner	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assisting the President Director in leading, supervising, and coordinating all business and operational activities of the company assisted by the Deputy President Director. (Decree of the Director No. KP/132/DIR/R dated April 6, 2023). 3) Supervising the SEVP Human Capital in order to lead, supervise, and coordinate all activities and organizations of the Human Capital Strategy, Human Capital Services Organization, BNI University Organization, and Human Capital Business Partner Organization. 4) Leading, supervising, and coordinating all activities related to the Compliance Organization, Legal Organization, and Policy Governance Organization (Decree of the Director No. KP/235/DIR/R dated June 7, 2024). 5) To serve as the Supervising Director of the Regional Office 02 and Regional Office 07 (CDV Memo No. CDV/2/563 dated March 20, 2024). 6) To serve as the Supervising Director of the Tokyo Overseas Branch (CDV Memo No. CDV/2/563 dated March 20, 2024).

No.	Name	Position	Direct Supervision of Director/SEVP/Division	Scope of Work and Responsibilities
8	Toto Prasetio	Technology and Operations Director	Directorate/SEVP: 1) SEVP Information Technology 2) SEVP Operations Division/Unit/Functional Unit: 1) IT Strategy & Architecture Division 2) CISO Division 3) Operations Strategy & Development Division 4) SORX Technology, Digital, & Operations SEVP Information Technology directly supervises Division/ Unit/Functional Unit: 1) Wholesale Digital Delivery Division 2) Retail Digital Delivery Division 3) Application Development Division 4) IT Application Services Division 5) IT Infrastructure Management Division SEVP Operations directly supervises Division/Unit/ Functional Unit: 1) Banking Operations Division 2) Digital Operations Division 3) Credit Operations Division	Under the supervision of the Deputy President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assist the Deputy President Director in leading, supervising, and coordinating all BNI Technology & Operations activities. (SK Dir No. KP/235/DIR/R dated June 7, 2024). 3) Supervise SEVP Information Technology in order to lead, supervise, and coordinate all activities and Wholesale Digital Delivery Organization, Retail Digital Delivery Organization, Application Development Organization, IT Application Services Organization, and IT Infrastructure Management Organization. 4) Supervise SEVP Operations in order to lead, supervise, and coordinate all activities and Banking Operations Organization, Digital Operations Organization, Credit operations Organization 5) To lead, supervise, and coordinate all activities related to IT Strategy & Architecture Organization, CISO Organization, Operations Strategy & Development Organization and SORX Technology, Digital & Operations (SK Dir No. KP/235/DIR/R dated June 7, 2024). 6) To serve as the Supervising Director of the Regional Office 09 and Regional Office 15 (CDV Memo No. CDV/2/563 dated March 20, 2024). 7) To serve as the Supervising Director of the Subsidiary–BNI Ventures (CDV Memo No. CDV/2/563 dated March 20, 2024). 8) To serve as the Supervising Director of the Seoul Overseas Branch (CDV Memo No. CDV/2/563 dated March 20, 2024).
9	I Made Sukajaya	Enterprise and Commercial Banking Director	Division/Unit/Functional Unit: 1) Enterprise Banking Division 2) Commercial Banking 1 Division 3) Commercial Banking 2 Division 4) Senior Business Executive	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assist the President Director in leading, supervising, and coordinating all BNI Enterprise & Commercial Banking activities. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3) To lead, supervise, and coordinate all activities and Organizations of Enterprise Banking, Commercial Banking Organization 1, Commercial Banking Organization 2, and Senior Business Executive (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 4) To serve as the Supervising Director of the Regional Office 01 and Regional Office 10. (CDV Memo No. CDV/2/563 dated March 20, 2024).

No.	Name	Position	Direct Supervision of Director/SEVP/Division	Scope of Work and Responsibilities
10	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Directorate/SEVP: SEVP Retail Digital Solutions Division/Unit/Functional Unit: 1) Wholesale Transaction Product & Partnership Division 2) Wholesale Digital Channel Division 3) Corporate Development & Transformation Division 4) Strategic Project SEVP Retail Digital Solutions directly supervises Division/ Unit/Functional Unit: 1) Retail Digital Product & Partnership Division 2) Retail Digital Channel Division 3) Marketing Communications Division	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assist the Deputy President Director in leading, supervising, and coordinating all BNI Digital & Integrated Transaction Banking activities including Retail Digital Solutions (SK Dir No. KP/235/DIR/R dated June 7, 2024). 3) Supervise SEVP Retail Digital Solutions in order to lead, supervise, and coordinate all activities and the Retail Digital Product & Partnership Organization, Retail Digital Channel Organization and Marketing Communications Organization. 4) To lead, supervise, and coordinate all activities related to the Corporate Development & Transformation Organization, Strategic Projects, Wholesale Transaction Product & Partnership Organization, and Wholesale Digital Channel Organization (SK Dir No. KP/132/DIR/R dated April 6, 2023). 5) To serve as the Supervising Director of the Regional Office 14 and Regional Office 08 (CDV Memo No. CDV/2/563 dated March 20, 2024). 6) To serve as the Supervising Director of the Singapore Overseas Branch (CDV Memo No. CDV/2/563 dated March 20, 2024). 7) To serve as the Supervising Director of the Subsidiary – hibank (CDV Memo No. CDV/2/563 dated March 20, 2024).
11	Agung Prabowo	Wholesale and International Banking Director	Directorate/SEVP: 1) SEVP Corporate Banking 2) SEVP Treasury Division/Unit: 1) Corporate Banking 1 Division 2) Corporate Banking 2 Division 3) Syndication & Structured Finance Division 4) International & Financial Institutions Division 5) Senior Business Executive 6) SORX Wholesale Banking 7) Overseas Branch SEVP Corporate Banking directly supervises Division/ Unit/Functional Unit: 1) Corporate Banking 3 2) Corporate Banking 4 SEVP Treasury directly supervises the Division/ Functional Units: Treasury Division	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) Assisting the President Director in leading, supervising, and coordinating all Wholesale and International Banking activities of BNI. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3) Supervising SEVP Corporate Banking in order to lead, supervise and coordinate all activities and organizations of Corporate Banking 3 and Corporate Banking 4. 4) Supervising SEVP Treasury in order to lead, supervise, and coordinate all activities and organizations of Treasury. 5) To lead, supervise, and coordinate all activities and Corporate Banking Organization 1, Corporate Banking Organization 2, Syndication & Structured Finance Organization, International & Financial Institutions Organization, Senior Business Executive, SORX Wholesale Banking, and Overseas Network. 6) To serve as the Supervising Director of the Regional Office 12 and Regional Office 06 (CDV Memo No. CDV/2/563 dated March 20, 2024). 7) To serve as the Supervising Director of the Subsidiary - BNI Sekuritas and BNI Remittance (SK Dir No. KP/235/ DIR/R dated June 7, 2024).

No.	Name	Position	Direct Supervision of Director/SEVP/Division	Scope of Work and Responsibilities
12	Munadi Herlambang*	Institutional Banking Director	Division/Unit/Functional Unit: 1) Institutional Banking 1 Division 2) Institutional Banking 2 Division	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1) Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2) To assist the President Director in leading, supervising, and coordinating all BNI Institutional Banking activities. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3) To lead, supervise, and coordinate all activities related to Institutional Banking Organization 1 and Institutional Banking Organization 2 (Decree of the Director No. KP/235/DIR/R dated June 7, 2024). 4) To serve as the Supervising Director of the Regional Office 05 and Regional Office 16. (CDV Memo No. CDV/2/563 dated March 20, 2024).

*) *) The implementation of the duties of Institutional Banking Director refers to the Substitute Director mechanism applicable at BNI.

AUTHORITY OF THE BOARD OF DIRECTORS

In carrying out its duties and responsibilities, the Board of Directors has a number of authorities as follows:

1) Establish policies deemed appropriate for the management of the Company.
2) Regulate the transfer of the powers of the Board of Directors to represent the Company inside and outside of the Court to a person or several members of the Board of Directors specifically appointed for this purpose or to a person or several employees of the Company, either individually or jointly or to another person or body;
3) Regulate provisions regarding the Company's personnel including determining salaries, pensions or old age security, production services and other income for the Company based on applicable laws and regulations;
4) Appoint, reward or sanction and dismiss Company employees based on the Company's personnel regulations and applicable laws and regulations;
5) Appoint and dismiss the Corporate Secretary and/or Head of the Internal Audit Unit with approval from the Board of Commissioners;
6) Write off bad debts with the provisions as stipulated in the Articles of Association and which are then reported to the Board of Commissioners, then reported and accounted for in the Annual Report;
7) Not collect any more part or all of the receivables beyond the principal amount carried out in the context of credit restructuring and/or settlement, but with the obligation to report to the Board of Commissioners, the reporting provisions and procedures are determined by the Board of Commissioners; And
8) Carry out all actions and other actions regarding the management and ownership of the Company's assets, binding the Company with other parties and/or other parties with the Company, with restrictions as regulated in the statutory regulations, Articles of Association and/or GMS Resolutions.

BOARD OF DIRECTORS' RESPONSIBILITIES

As regulated in the BNI Board of Directors' Work Guidelines and Procedures, the Board of Directors is responsible for:

1) Promoting and ensuring the implementation of the Company's business and activities in accordance with its purposes and objectives as well as its business activities;
2) Establishing on time the Company's Long Term Plan, the Company's Annual Work Plan and Budget, and other work plans, and any amendments to be submitted to the Board of Commissioners for approval;
3) Preparing the Shareholders Register, Special Register, GMS Minutes, and Minutes of the Board of Directors' meetings;
4) Preparing the Annual Report, which contains the Financial Statements, as a form of accountability of the Company's management as well as the Company's financial documents as referred to in Law on Company Documents;
5) Preparing the Financial Statements based on the Financial Accounting Standards and submit them to Public Accountant to be audited;
6) Delivering the Annual Report after review by the Board of Commissioners within a maximum period of 5 (five) months after the Company's fiscal year ends to the GMS for approval and ratification;
7) Providing explanation to the GMS on the Annual Report;

8) Delivering the Balance Sheet and Income Statement after approval by the GMS to the Minister in charge of Law in accordance with the provisions of laws and regulations;
9) Preparing other reports mandated by the provisions of laws and regulations;
10) Maintaining a Shareholders Register, Special Register, GMS Minutes, Minutes of Board of Commissioners' Meeting, and Minutes of Board of Directors' Meeting, Annual Report, and Company's financial documents and other Company's documents;
11) Maintaining the following matters in the Company's domicile: Shareholders Register, Special Register, GMS Minutes, Minutes of Board of Commissioners' Meeting, and Minutes of Board of Directors' Meeting, Annual Report, and Company's financial documents as well as other Company's documents;
12) Procuring and maintaining the Company's bookkeeping and administration according to norms applicable to a company;
13) Preparing an accounting system in accordance with the Financial Accounting Standards and based on the principles of internal control, especially the functions of handling, recording, storing, and supervising;
14) Providing periodic reports in the manner and time in accordance with the applicable provisions, as well as other reports anytime at the request of the Board of Commissioners and/or Shareholders of Series A Dwiwarna; by observing the laws and regulations particularly the regulations in Capital Market sector;
15) Preparing the Company's organizational structure complete with the details and duties;
16) Providing explanations on all matters questioned or requested by members of the Board of Commissioners and Shareholders of Series A Dwiwarna, by observing the laws and regulations particularly in Capital Market sector; and
17) Carrying out other obligations in accordance with the provisions stipulated in the laws and regulations, Articles of Association and/or as determined by the GMS.

BOARD OF DIRECTORS' ACTIONS THAT MUST OBTAIN GMS APPROVAL

The following is a list of actions of the Board of Directors that need to be approved by the GMS, namely:

1) The Board of Directors is responsible for requesting approval from the GMS to:
   a. Transfer the Company's assets; or
   b. Make collateral for debts of the Company's assets, which constitute more than 50% (fifty percent) of the Company's net assets in 1 (one) or more transactions, whether related to each other or not, except for the implementation of the Company's business activities as referred to in the Articles of Association.
2) Actions carried out without the approval of the GMS remain binding on the Company as long as the other parties to the legal action have good intentions; and
3) The GMS may reduce restrictions on the actions of the Board of Directors as regulated in these Articles of Association or determine other restrictions on the Board of Directors other than those regulated in the Articles of Association.

BOARD OF DIRECTORS' ACTIONS THAT MUST OBTAIN WRITTEN APPROVAL FROM THE BOARD OF COMMISSIONERS [ACGS D.1.2]

1) In carrying out certain legal actions, the Board of Directors must obtain prior written approval from the Board of Commissioners, especially regarding the matters below:
   a. Releasing/transferring and/or pledging Company assets with criteria and value exceeding a certain amount determined by the Board of Commissioners, except for Company assets in the context of carrying out the Company's business activities in accordance with applicable laws and regulations, which include assets in the form of credit, securities, repossessed collateral, movable goods, and other assets acquired in the context of the Company's business activities with due observance of provisions in the capital markets and banking sector;
   b. Writing off fixed assets due to certain conditions that:
      (1) Lost;
      (2) Destroyed;
      (3) Damage that cannot be transferred (total lost);
      (4) The transfer costs are greater than the economic value obtained from the transfer;
      (5) Dismantled to be rebuilt or built into other Fixed Assets, the budget of which has been determined by the GMS/Minister through ratification of the RKAP;
      (6) Dismantled not to be rebuilt in connection with other programs planned by the RKAP;
      (7) Dismantled to be rebuilt in connection with a government program; and/or
      (8) Based on statutory regulations and/or court decisions that have permanent legal force, the Fixed Assets are no longer owned or controlled by the SOE.
   c. Holding cooperation with business entities or other parties, in the form of Operational Cooperation (KSO), Business Cooperation (KSU), License Cooperation, Build, Operate and Transfer (BOT), Build, Transfer and Operate/BTO, Build, Operate and Own (BOO),

and other agreements of the same nature whose term or value exceeds that determined by the Board of Commissioners;

d. Determine and change the Company's logo;
e. Establish an organizational structure 1 (one) level below the Board of Directors;
f. Make capital participation, release capital participations, including changes to the capital structure with a certain value determined by the Board of Commissioners in other companies, subsidiaries, and joint venture companies that are not in the context of rescuing receivables by considering provisions in the capital market and banking sectors;
g. Establish a subsidiary and/or joint venture company with a certain value determined by the Board of Commissioners, considering provisions in the Capital Market and banking sectors;
h. Proposing representatives of the Company to become candidates for members of the Board of Directors and Board of Commissioners in subsidiaries that make significant contributions to the Company and/or have strategic value as determined by the Board of Commissioners;
i. Carrying out mergers, consolidations, takeovers, separations, and dissolution of subsidiaries and joint venture companies with a certain value determined by the Board of Commissioners considering provisions in the Capital Market and banking sectors;
j. Carry out actions that are included in material transactions as determined by the laws and regulations in the capital markets sector with a certain value determined by the Board of Commissioners, unless the actions are included in material transactions that are excluded by the laws and regulations in force in the Capital Markets and banking sector;
k. Actions that have not been determined in the RKAP;
l. Actions to transfer include selling, relinquishing the right to collect, and/or no longer collecting:
    - Non-performing principal receivables that have been written off in the context of credit settlement, either in part or in whole; and
    - The difference between the value of non performing principal receivables that have been written off and the value of the transfer, including sales, or the value of the disposal of rights;
    - Implemented based on the policy of the Board of Directors, which has been approved by the Board of Commissioners and within the amount of the ceiling (limit) for write-offs that has been determined by the GMS, which will remain in effect until a new ceiling (limit) is determined by the GMS.

2. Approval from the Board of Commissioners regarding paragraph (7) letters a, c, f, g, h, and i with certain limitations and/or criteria is determined after obtaining approval from the Series A Dwiwarna Shareholders.
3. Determination of limits and/or criteria by the Board of Commissioners for matters in letters a, c, f, g, h, and i is carried out after obtaining approval from the Series A Dwiwarna Shareholders.
4. The actions of the Board of Directors as referred to in letters a and c of this Article, as long as they are necessary in order to carry out business activities that are commonly carried out in the banking business sector by considering the provisions of laws and regulations, do not require approval from the Board of Commissioners and/or the GMS.
5. The actions of the Board of Directors as referred to in letter b, number 2), number 3), and number 8). This article is carried out after obtaining approval from the Series A Dwiwarna Shareholders.
6. Within a maximum period of 30 (thirty) days from receipt of the request or complete explanation and documents from the Board of Directors, the Board of Commissioners must provide a decision as referred to in numbers (7) and (8) letters a and d.

BOARD OF DIRECTORS' ACTIONS THAT MUST GET A RESPONSE FROM THE BOARD OF COMMISSIONERS

Below is a list of actions that can only be carried out by the Board of Directors after receiving a written response from the Board of Commissioners and obtaining approval from the GMS, including:

1) Carry out actions that are included in material transactions as stipulated by statutory regulations in the Capital Market sector with a value above 50% (fifty percent) of the Company's equity, unless such actions are included in material transactions that are excluded by statutory regulations that apply in the Capital Market sector;
2) Carrying out transactions that contain a conflict of interest as determined in the applicable laws and regulations in the Capital Market;
3) Carrying out other transactions to comply with applicable laws and regulations in the Capital Market.

If within 30 (thirty) days of receiving the request or complete explanation and documents from the Board of Directors, the Board of Commissioners does not provide a written response, then the GMS can decide without a written response from the Board of Commissioners. Actions carried out without the approval of the GMS remain binding on the Company as long as the other parties to the legal action have good intentions.

DIRECTOR IN CHARGE OF COMPLIANCE FUNCTIONS

In line with the development of the BNI financial conglomerate, which is getting bigger, the risks of business activities faced by the Bank continue to increase so that preventive (ex-ante) and curative (ex-post) efforts are needed to ensure the implementation of policies, provisions, systems, and procedures as well as Business activities carried out by the Bank are in accordance with OJK provisions and statutory regulations, as well as ensuring the Bank's compliance with commitments made by the Bank to the OJK and/or other authorized Supervisory Authorities. In connection with this, BNI has a Director who is in charge of the Compliance Function (Compliance Director), namely Mucharom.

The Compliance Director specifically supervises the Compliance Function, which is fully responsible for the implementation of the compliance function, has the obligation to foster and realize the implementation of a Compliance Culture at all levels of the Bank's organization and business activities, and plays an important role in the Bank's compliance risk management. The appointment of the BNI Compliance Director has fulfilled the independence requirements as regulated in POJK No. 46/POJK.03/2017 concerning the implementation of Compliance Functions for Commercial Banks and not to supervise functions that are not permitted by applicable regulations.

Further description regarding the realization and achievements of the Compliance Function in carrying out Compliance Programs and Activities during 2024 is explained in more detail in the Compliance Work Unit section of this report.

Requirements for the Director in Charge of the Compliance Function

Prospective Directors in charge of the BNI Compliance Function are required to meet the following individual criteria or requirements:

1) Prospective Directors who are in charge of the compliance function must have integrity and adequate knowledge regarding the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations; and
2) The Director in charge of the Compliance Function is required to fulfill independence requirements. "Independence requirements" are not having financial, management, share ownership, and/or familial relationships up to the third degree with members of the Board of Commissioners, the Board of Directors, and/or controlling Shareholders or relationships with the Bank that could affect their ability to act independently as intended in provisions regarding the Implementation of Good Corporate Governance for Commercial Banks.

Organizational Structure of the Director in Charge of the Compliance Function

1) The President Director and/or Deputy President Director are not permitted to hold concurrent positions as Directors in charge of the Compliance function.
2) The Director who is in charge of the Compliance function is prohibited from being in charge of the following functions:
   a. Business and operations;
   b. Risk management, which makes decisions on the Bank's business activities;
   c. Treasury;
   d. Finance and accounting;
   e. Logistics and procurement of goods/services;
   f. Information Technology; and
   g. Internal audit.
3) Replacement of the Director in charge of the Compliance function:
   a. In the event that the Director in charge of the Compliance function is unable to carry out his/her office duties for more than 7 (seven) consecutive working days then the relevant Director must be temporarily replaced by another Director until the Director in charge of the Compliance function is able to carry out his/her office duties again;
   b. In the event that the Director in charge of the Compliance function is permanently absent, resigns, or his/her term of office has expired, the Bank is obliged to immediately appoint a replacement for the Director in charge of the Compliance function, no later than 6 (six) months after the Director in charge of the Compliance function is permanently absent, resigns, or his/her term of office expires;
   c. During the process of replacing the Director in charge of the Compliance function, the Bank is obliged to appoint or assign another Director to temporarily carry out the duties of the Director in charge of the Compliance function;

d. Directors carrying out temporary duties as Directors in charge of the Compliance function are required to fulfill the above requirements. This is excepted if there is no Director in the Company who fulfills these requirements; and
e. The temporary replacement of the position of Director in charge of the Compliance function must be reported to the Financial Services Authority.

Duties and Responsibilities of the Director in Charge of the Compliance Function

The duties and responsibilities of the Director in charge of the Compliance Function include at least:

1) Formulate a strategy to encourage the creation of a Bank Compliance Culture;
2) Propose a compliance policy or compliance principles that will be determined by the Board of Directors;
3) Establish compliance systems and procedures that will be used to develop Bank internal regulations and guidelines;
4) Ensure that all regulatory policies, systems and procedures, as well as business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations;
5) Minimizing Bank Compliance Risk;
6) Take preventive measures so that policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations;
7) In order to implement the Anti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM), the Compliance Director has the duties and responsibilities of at least:
   a. Proposing strategic written policies and procedures regarding the implementation of the APU PPT and PPPSPM programs to the Board of Commissioners;
   b. Ensure that the implementation of APU PPT and PPPSPM is carried out in accordance with established written policies and procedures;
   c. Ensure that the scope of active supervision of the Board of Directors is fulfilled adequately;
   d. Monitor and maintain the Bank's compliance with all commitments made by the Bank to the Financial Services Authority, including commitments in the Action Plan, Data Update Activity Plan Report, and the results of Bank Indonesia supervision related to the implementation of the APU PPT and PPPSPM Programs;
   e. Monitor the implementation of the duties of the Special Work Unit and/or Bank officials responsible for the implementation of APU PPT and PPPSPM;
   f. Provide recommendations to the President Director regarding officials who will lead the Special Work Unit or officials responsible for implementing the APU PPT and PPPSPM Programs;
   g. Providing approval for Suspicious Financial Transaction Reports (LTKM);
   h. Propose an Action Plan Report and Data Update Plan Report before submitting it to the Financial Services Authority; and
   i. Ensure that officials and/or employees, especially from related work units and new employees, have attended training related to the implementation of APU PPT and PPPSPM once a year.
8) The Director in charge of the Compliance function is obliged to submit a report to the Financial Services Authority regarding the implementation of his duties, including:
   a. Compliance Work Plan contained in the Bank Business Plan;
   b. Compliance Report; and
   c. Special reports regarding policies and/or decisions of the Board of Directors, which, according to the Director in charge of the Compliance function, have deviated from the provisions of the Financial Services Authority and/or applicable laws and regulations as part of the duties of the Director in charge of the Compliance function.
9) Report the implementation of duties and responsibilities to the President Director with a copy to the Board of Commissioners at least quarterly;
10) Perform other tasks related to the Compliance function.

POLICY ON CONCURRENT POSITIONS OF THE BOARD OF DIRECTORS [ACGS D.2.6, D.2.7]

Referring to the BNI Board of Directors' Work Guidelines and Procedures and as stated in SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, all members of the BNI Board of Directors do not hold concurrent positions other than those permitted by the applicable rules and regulations. Members of the BNI Board of Directors are prohibited from holding concurrent positions as members of the Board of Commissioners, the Board of Directors, or Executive Officers in banks, companies, and/or other institutions except when permitted. However, there are exceptions to not being included in the concurrent position category

if the Board of Directors has responsibility for supervision at a subsidiary of the Bank, carries out functional duties as a member of the Board of Commissioners at a non-bank subsidiary company controlled by the Bank, as long as the concurrent position does not result in the person concerned neglecting their implementation duties and responsibilities as a member of the Bank's Board of Directors.

General provisions regarding concurrent positions for the Board of Directors are regulated in the following regulations:

1) Based on SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, members of the Board of Directors are prohibited from holding concurrent positions as:
   a. Board of Directors of SOE, Regional Owned Enterprises, Private Owned Enterprises;
   b. Board of Commissioners/Supervisory Board at SOE and other companies;
   c. Other structural and functional positions in central and/or regional government agencies/institutions;
   d. Other positions in accordance with provisions in statutory regulations;
   e. Political party administrators, legislative members and/or regional heads/deputy regional heads;
   f. Other positions that may give rise to a conflict of interest; and/or
   g. Become a legislative candidate or candidate for regional head/deputy regional head.

In addition to the concurrent positions mentioned above, members of the BNI Board of Directors are prohibited from holding concurrent positions as members of the Board of Commissioners in other companies, except:

1) The Board of Commissioners of the relevant SOE subsidiary/SOE-affiliated company, provided that they are only entitled to the highest income from the position held concurrently, unless otherwise determined by the Minister; and
2) Board of Commissioners in other companies to represent/stand for the interests of SOE as long as they obtain permission from the Minister of SOE.

Information regarding concurrent positions of the Bank's Board of Directors as of December 31, 2024, is described as follows:

Name	Position in the Bank	Member of Board of Directors of State-Owned Enterprises, Regional-Owned Enterprises, Private-Owned Enterprises	Political Party Management and/or Candidates Members of DPR, DPD, DPRD Level I, and DPRD Level II and/or Regional Head/Deputy Regional Head Candidates	Other Positions in Accordance with the Provisions of Laws and Regulations	Other Positions that can Cause a Conflict of Interest	Position in Subsidiary
Royke Tumilaar	President Director	No	No	No	No	No
Putrama Wahju Setyawan	Deputy President Director	No	No	No	No	No
Novita Widya Anggraini	Finance Director	No	No	No	No	No
Corina Leyla Karnalies	Retail Banking Director	No	No	No	No	No
David Pirzada	Risk Management Director	No	No	No	No	No
Ronny Venir	Network and Services Director	No	No	No	No	No
Mucharom	Human Capital and Compliance Director	No	No	No	No	No
Toto Prasetio	Technology and Operations Director	No	No	No	No	No
I Made Sukajaya	Enterprise and Commercial Banking Director	No	No	No	No	No

Name	Position in the Bank	Member of Board of Directors of State-Owned Enterprises, Regional-Owned Enterprises, Private-Owned Enterprises	Political Party Management and/or Candidates Members of DPR, DPD, DPRD Level I, and DPRD Level II and/or Regional Head/Deputy Regional Head Candidates	Other Positions in Accordance with the Provisions of Laws and Regulations	Other Positions that can Cause a Conflict of Interest	Position in Subsidiary
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	No	No	No	No	No
Agung Prabowo	Wholesale and International Banking Director	No	No	No	No	No
Munadi Herlambang*	Institutional Banking Director	No	No	No	No	No

* Has not been effective

MANAGEMENT OF CONFLICTS OF INTEREST OF THE BOARD OF DIRECTORS

[ACGS A.8.2]

BNI ensures that all serving members of the Board of Directors have no conflict of interest or potential conflict of interest with the Bank. All members of the Bank's Board of Directors adhere to their commitment to avoid potential conflicts of interest or always position themselves to avoid potential conflicts of interest in any situation as regulated in the Guidelines for Handling Conflicts of Interest No. IN/119/CMP/001 dated December 27, 2024. In the event of a conflict of interest, the Board of Directors is prohibited from taking action that could harm or reduce the Bank's profits and is obliged to disclose the potential conflict of interest in every decision. The actions that must be taken by members of the Board of Directors if a conflict of interest occurs include:

1) Must prioritize the economic interests of the Company above the economic interests of personal or family or other parties;
2) Not to use his/her position for personal interests or for the interests of other people or parties that conflict with the interests of the Company;
3) Must fill out a Special List containing his/her and/or his/her family's share ownership of 5% (five percent) or more in banks or other companies domiciled at home and abroad;
4) Must disclose financial and familial relationships with other members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders of the Company;
5) Prohibited from taking actions that could harm the Company or reduce the Company's profits and must disclose conflicts of interest in every decision in the event of a conflict of interest; and
6) Not to participate in discussions and decision-making that contain elements of conflict of interest.

PARTICIPATION OF BOARD OF DIRECTORS MEMBERS IN PROFESSIONAL ASSOCIATIONS AND/OR ORGANIZATIONS

A number of members of the BNI Board of Directors are registered as active members in several professional associations or organizations. The activeness of a member of the Board of Directors in a professional association or organization does not result in the person concerned neglecting the implementation of their duties and responsibilities as a member of the Bank's Board of Directors, and therefore this is not included in the category of having concurrent positions.

No.	Name	Position	Position in Association/Organization
1	Royke Tumilaar	President Director	• Treasurer II - Indonesian Bankers Association (IBI) • Deputy General Chair - Indonesian Golf Association (PGI)
2	Putrama Wahju Setyawan	Deputy President Director	-
4	Novita Widya Anggraini	Finance Director	Treasurer - Indonesian Bankers Association (IBI)
3	Corina Leyla Karnalies	Retail Banking Director	Deputy Chair - Indonesian Payment Systems Association (ASPI)
5	David Pirzada	Risk Management Director	• Director of Directorate - Financial Risk Management • Member - Indonesian Bankers Association (IBI)
6	Ronny Venir	Network and Services Director	-
7	Mucharom	Human Capital and Compliance Director	• Head of Division 1 Organization Development & Workforce Planning – Indonesian Human Capital Forum (FHCI) • Treasurer III - Indonesian Economic Scholars Association (ISEI) • Legal & ESG Management of the National Bank Association (PERBANAS) • Deputy Head of Training - Banking Compliance Director Communication Forum (FKDKP) • Sports Sector Manager - Indonesian Bankers Association (IBI)
8	Toto Prasetio	Technology and Operations Director	• Secretary General - Banking Operations Director Communication Forum (FKDOP) • Member - ICIO Community • Deputy Chair of Division III - SOE Digital Forum (Fordigi).
9	I Made Sukajaya	Enterprise and Commercial Banking Director	Member - Association of Indonesian Economic Scholars (ISEI)
10	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Deputy Chair for Social Affairs - Indonesian Bankers Association (IBI)
11	Agung Prabowo	Wholesale and International Banking Director	-
12	Munadi Herlambang*	Institutional Banking Director	• Deputy Chair of Division IV (Ecosystem Development) - SOE Digital Forum (Fordigi). • Deputy Main General Chair - ITS Alumni Association

* Has not been effective

POLICY ON THE PROVISION OF LOANS FOR THE BOARD OF DIRECTORS [ACGS A.8.3]

BNI does not prohibit and has a policy of providing loans to the Board of Directors, which are carried out in accordance with the loan policies applicable at BNI and are guided by applicable regulations, and fulfill the same terms and conditions for granting loans as parties not related to BNI. The policy for granting loans to the Board of Directors is implemented by prioritizing the principles of an arm's-length basis and at market rates as regulated in the Company Guidelines for Business Banking Loan Procedures for the Corporate & Enterprise Segment, Book I, Chapter Loan Approval and Board of Directors' Charter.

INDEPENDENCE OF THE BOARD OF DIRECTORS [ACGS A.8.2]

All members of the Board of Directors always prioritize a professional and independent attitude in carrying out their duties and responsibilities and always take actions and decisions based on GCG principles in order to achieve the Bank's interests above their own interests. Members of the Board of Directors are obliged to disclose to the Bank whether they, directly, indirectly, or on behalf of a third party, have a material interest in any transaction or issue that directly impacts the Bank, including if there is a change in personal or family share ownership in BNI and/or at other banks, non-bank financial institutions, and other companies.

Concrete steps in this regard are demonstrated by the Board of Directors by signing an independence statement sheet in the form of a Statement of Independent Acting in the Implementation of the Company's Operational Management at the beginning of each year to state its independence status and at the end of the year to state whether during the last year there was a situation where there was a conflict of interest by the Board of Directors regarding their actions.

Statement of Independence of Members of the Board of Directors

Statement	Royke Tumilaar	Putrama Wahju Setyawan	Novita Widya Anggraini	Corina Leyla Kamalies	David Pirzada	Ronny Venir	Mucharom	Toto Prasetio	I Made Sukajaya	Hussein Paolo Kartadjoemena	Agung Prabowo	Munadi Herlambang*
An independent party with no affiliation to the Bank's owner or Controlling Shareholder (PSP).	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
Has no financial, managerial, share ownership, and/or family relationship with other members of the Board of Commissioners, members of the Board of Directors, and/or the controlling shareholder, or any other relationship that may affect the ability to act independently.	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

* Has not been effective

BOARD OF DIRECTORS' SHARE OWNERSHIP [ACGS C.1.3]

All Board of Directors have reported transparency of share ownership held both in BNI and in banks or other companies. The share ownership of each Board of Director can be seen in the table below:

Board of Directors' Share Ownership as of December 31, 2024

Name	Position	Share Ownership	
		BNI	Other Bank or Company
Royke Tumilaar	President Director	3,656,941 shares (0.0098%)	None
Putrama Wahju Setyawan	Deputy President Director	3,879,526 shares (0.0104%)	None
Novita Widya Anggraini	Finance Director	3,143,884 shares (0.0084%)	None
Corina Leyla Karnalies	Retail Banking Director	3,506,474 shares (0.0094%)	None
David Pirzada	Risk Management Director	2,859,984 shares (0.0076%)	None
Ronny Venir	Network and Services Director	3,539,596 shares (0.0094%)	None
Mucharom	Human Capital and Compliance Director	2,541,148 shares (0.0068%)	None
Toto Prasetio	Technology and Operations Director	2,163,696 shares (0.0058%)	None
I Made Sukajaya	Enterprise and Commercial Banking Director	576,912 shares (0.0015%)	None
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	918,611 shares (0.0024%)	None
Agung Prabowo	Wholesale and International Banking Director	101,356 shares (0.0002%)	None
Munadi Herlambang*	Institutional Banking Director	None	None

* Has not been effective

BOARD OF DIRECTORS MEETING

Policies and Implementation of Board of Directors Meetings

Board of Directors meetings must be held regularly, at least once per month. A Board of Directors Meeting can be held at any time if deemed necessary by one or more members of the Board of Directors or upon written request from one or more members of the Board of Commissioners. This policy is in line with the provisions of POJK No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies as well as Article 13 of the Bank's Articles of Association and the Board of Directors' Charter. The following is a description of the policy for implementing BNI Board of Directors Meetings:

Meeting Implementation	1) The Board of Directors is obliged to hold regular Board of Directors Meetings at least once per month. 2) The Board of Directors is obliged to hold regular Board of Directors and Board of Commissioners meetings at least once every 4 (four) months. 3) The Board of Directors meeting as referred to in points 1 and 2 is held if attended by the majority of members of the Board of Directors. 4) The Board of Directors is obliged to determine the rules for the Board of Directors' meetings. 5) Board of Directors Meetings can be held at any time if: a. deemed necessary by one or more members of the Board of Directors; b. Upon written request from one or more members of the Board of Commissioners.
Meeting Summon	1) Meetings can be held at the Company's domicile or at other places within the territory of the Republic of Indonesia or at the Company's place of business activities. 2) Summons for Board of Directors Meetings must be made by members of the Board of Directors who have the right to represent the Board of Directors. 3) Summons for Board of Directors Meetings must be made in writing and conveyed or delivered directly to each member of the Board of Directors with adequate receipt or by registered post or by courier service or by telex, fax, or electronic mail (e-mail) no later than 5 (five) working days before the meeting is held without taking into account the date of summons and the date of the meeting or within a shorter time if in urgent circumstances. [ACGS D.3.6] 4) Summons for the Board of Directors Meeting must include the agenda, date, time, and place of the meeting. Board of Directors meetings can be held at the Company's domicile or at other places within the territory of the Republic of Indonesia or at the Company's place of business activities. 5) Board of Directors' meeting materials are distributed to all meeting participants no later than 5 (five) working days before the meeting is held, and in case the meeting is held outside the schedule, meeting materials can be submitted before the meeting is held.
Chairman of the Board of Directors Meeting	1) All Board of Directors Meetings are chaired by the President Director, and in case the President Director is absent or unable to attend, then the Deputy President Director who chairs the Board of Directors Meeting or a Director appointed in writing by the President Director who chairs the Board of Directors Meeting if at the same time the Deputy President Director is absent or is unavailable, or the Director is appointed by the Deputy Director who chairs the Board of Directors Meeting if at the same time the President Director is absent or unavailable and does not make the appointment. 2) If the GMS does not appoint a Deputy President Director, then in the event that the President Director is absent or unavailable, one of the Directors appointed in writing by the President Director will chair the Board of Directors Meeting. 3) In the event that the President Director does not make an appointment, then one of the Directors who has served the longest as a member of the Board of Directors shall chair the Board of Directors Meeting. 4) In the event that the Director who has served the longest as a member of the Company's Board of Directors is more than 1 (one) person, then the Director referred to in number 3 above is the oldest in age who acts as chairman of the Board of Directors Meeting.
Attendance	1) A member of the Board of Directors may be represented at a Board of Directors Meeting only by another member of the Board of Directors based on a power of attorney. A member of the Board of Directors can only represent another member of the Board of Directors. 2) Members of the Board of Directors who are unable to attend a Board of Directors Meeting can submit their opinion in writing and sign it, then convey it to the President Director or Deputy President Director or to other members of the Board of Directors who will chair the Board of Directors Meeting, regarding whether they support or do not support the matters to be discussed, and opinions will be considered as valid votes cast at the Board of Directors Meeting. 3) In the event that members of the Board of Directors are unable to attend the meeting physically, members of the Board of Directors can attend the meeting via teleconference, video conference, or other electronic media, in accordance with applicable regulations. 4) Every member of the Board of Directors who personally in any way, either directly or indirectly, has an interest in a transaction, contract, or proposed contract in which the Company is a party must have the nature of his interest declared at a Board of Directors Meeting and therefore has no right to take part in voting on matters relating to the transaction or contract.
Quorum and Decision Making [ACGS D.3.4]	1) A Board of Directors meeting is valid and has the right to make binding decisions if attended and/or represented by more than 2/3 (two thirds) of the total members of the Board of Directors. [ACGS E.3.4] 2) In the event that there is more than one proposal, a re-election is carried out so that one of the proposals receives more than 2/3 (two thirds) of the total votes cast. [ACGS E.3.4] 3) Decisions at Board of Directors Meetings must be taken based on deliberation to reach consensus. If a decision based on deliberation to reach a consensus is not reached, then the decision must be taken by voting based on the affirmative votes of more than 2/3 (two thirds) of the number of valid votes cast at the relevant meeting. [ACGS E.3.4] 4) At a Board of Directors Meeting, each member of the Board of Directors has the right to cast 1 (one) vote and an additional 1 (one) vote for each other member of the Board of Directors whom he or she legally represents at the meeting. 5) A blank vote (abstain) is deemed to approve the proposal submitted at the meeting. Invalid votes are considered non-existent and are not counted in determining the number of votes cast at the meeting. 6) Voting regarding individuals is carried out using closed ballot papers without signatures, while voting regarding other matters is carried out verbally, unless the Chairman of the Meeting determines otherwise without any objection based on the majority of votes from those present. 7) Every policy and strategic decision must be decided through a Board of Directors meeting with due regard to supervision in accordance with the duties and responsibilities of the Board of Commissioners.

Minutes of Meetings	1) The results of the Board of Directors Meeting must be stated in the Minutes of Meeting. The minutes of the meeting must be drawn up by someone present at the meeting appointed by the Chairman of the Meeting and then signed by all members of the Board of Directors present and submitted to all members of the Board of Directors. 2) The results of the Board of Directors and Board of Commissioners meetings must be included in the Minutes of Meeting. The minutes of the meeting must be drawn up by someone present at the meeting appointed by the Chairman of the Meeting and then signed by all members of the Board of Directors and members of the Board of Commissioners present and submitted to all members of the Board of Directors and members of the Board of Commissioners. 3) In the event that there are members of the Board of Directors and/or members of the Board of Commissioners who do not sign the results of the meeting as referred to in points 1 and 2 above, the person concerned is obliged to state the reasons in writing in a separate letter attached to the Minutes of Meeting. 4) The minutes of the meeting as referred to in points 1 and 2 above must be documented by the Company. 5) Minutes of the Board of Directors' Meetings are valid evidence for members of the Board of Directors and for third parties regarding the decisions taken at the relevant Meeting. 6) Board of Directors is required to prepare minutes of Board of Directors' meetings and document them in accordance with statutory regulations and articles of association. 7) Dissenting opinions that occur at Board of Directors meetings must be stated clearly in the minutes of the meeting along with the reasons for the difference of opinion.
Board of Directors	The Board of Directors can also make valid decisions without holding a Board of Directors Meeting provided that all members of the Board of Directors have been notified in writing and all members of the Board of Directors have given their approval regarding the proposal submitted in writing and signed the approval. Decisions taken in this way have the same force as decisions legally taken at a Board of Directors Meeting.

Level of Attendance of the Board of Directors Members at the Board of Directors Meetings, Joint Meetings of the Board of Directors and the Board of Commissioners, and GMS [ACGS D.3.2, D.3.3]

In 2024, the Board of Directors has held 46 (forty-six) Board of Directors Meetings and 8 (eight) Board of Directors Meetings with the Board of Commissioners, and 1 (one) GMS. The following is a description of the frequency and attendance of meetings for each member of the Board of Directors:

Name	Position	Board of Directors Meeting [ACGS D.3.5]			BOD and BOC Meetings			Annual GMS 2024 for the Year 2023		
		Number and (%) Attendance			Number and (%) Attendance			Number and (%) Attendance		
		Total Meeting	Level of Attendance	%	Total Meeting	Level of Attendance	%	Total Meeting	Level of Attendance	%
Royke Tumilaar	President Director	46	43	93	8	7	88	1	1	100
Putrama Wahju Setyawan	Deputy President Director	46	43	93	8	8	100	1	1	100
Novita Widya Anggraini	Finance Director	46	41	89	8	7	88	1	1	100
Corina Leyla Karnalies	Retail Banking Director	46	41	89	8	8	100	1	1	100
David Pirzada	Risk Management Director	46	40	87	8	7	88	1	1	100
Ronny Venir	Network and Services Director	46	39	85	8	8	100	1	1	100
Mucharom	Human Capital and Compliance Director	46	44	96	8	7	88	1	1	100
Toto Prasetio	Technology and Operations Director	46	40	87	8	7	88	1	1	100
I Made Sukajaya	Enterprise and Commercial Banking Director	39	38	97	6	6	100	-	-	-

Name	Position	Board of Directors Meeting [ACGS D.3.5]			BOD and BOC Meetings			Annual GMS 2024 for the Year 2023		
		Number and (%) Attendance			Number and (%) Attendance			Number and (%) Attendance		
		Total Meeting	Level of Attendance	%	Total Meeting	Level of Attendance	%	Total Meeting	Level of Attendance	%
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	39	37	95	6	6	100	-	-	-
Agung Prabowo	Wholesale and International Banking Director	39	35	90	6	5	83	-	-	-
Munadi Herlambang*	Institutional Banking Director	39	31	79	6	6	100	-	-	-
Adi Sulistyowati**	Deputy President Director	7	7	100	2	1	50	1	1	100
Sis Apik Wijayanto**	Enterprise and Commercial Banking Director	7	7	100	2	2	100	1	1	100
Silvano Winston Rumantir**	Wholesale and International Banking Director	7	7	100	2	1	50	1	1	100
Muhammad Iqbal**	Institutional Banking Director	7	5	71	2	2	100	1	1	100

*) Has not been efective
**) No longer serves as Director of the Bank in line with the expiration of his term of office as Director in accordance with the resolution of the AGMS dated March 4, 2024.

Throughout 2024, Board of Directors meetings were held 46 (forty-six) times with an average percentage of Board of Directors' attendance at meetings of 90.68%.

Agenda, Date, and Participants of the 2024 Board of Directors Meeting [ACGS D.3.5]

Throughout 2024, the Board of Directors has held 46 (forty-six) meetings with the following agenda, dates, and participation:

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
1.	January 8, 2024	1. General Agenda, including: 1) Financial Performance Update 2) Business Strategy Update 2. Corporate Action Approval	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• On Duty • Present • Present • On Leave • Present • On Leave • Present • Present • Permission • Present • Present • On Duty	BNI Meeting Room
2.	January 15, 2024	General Agenda, including Business Strategy Update	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• Present • Present • On Duty • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
3.	January 22, 2024	1. General Agenda, including: 1) Dashboard and Credit Process Improvement 2) Business Strategy Update 3) Anniversary Proposal 2. ESG Committee Update 3. Technology Management Committee	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
4.	January 29, 2024	1. Kick Off Strategies Initiative 2. Kick Off RBB 2024 3. General Agenda, including Calendar Event Update	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
5.	February 5, 2024	1. General Agenda, including Business Strategy Update 2. Financial Performance Update 3. Independent Consultant Review	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• Present • Present • Present • Present • Present • Present • Present • On Leave • On Leave • Present • Present • Present	BNI Meeting Room
6.	February 19, 2024	1. Human Capital Committee 2. Unit Assessment 2023 Update 3. General Agenda, including: 1) Business Strategy Update 2) Ground Breaking of Gedung PIK2 Development 4. Joint Chairman Assessment Unit 2023	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
7.	February 26, 2024	1. Human Capital Committee 2. Procurement Committee – Singapore Overseas Building 3. Technology Management Committee 4. Framework Operational Risk Management	• Royke Tumilaar • Adi Sulistyowati • Novita Widya Anggraini • Corina Leyla Karnalies • Sis Apik Wijayanto • David Pirzada • Silvano Winston Rumantir • Ronny Venir • Muhammad Iqbal • Putrama Wahju Setyawan • Mucharom • Toto Prasetio	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
8.	March 5, 2024	1. General Agenda 2. ALCO Committee 3. Human Capital Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present	BNI Meeting Room
9.	March 13, 2024	1. General Agenda, including Update Kinerja Wilayah 2. Risk Appetite Statement 3. ESG Update	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • On Duty • On Leave	BNI Meeting Room
10.	March 19, 2024	1. Business Strategy Update: 1) CS Teller Roster Progress 2) Savings Program 2. Boar of Directors Assignment 3. BoD Risk Management Certification 4. General Agenda, including: 1) Safari RamadhanUpdate 2) Preparation of Idul Fitri	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • On Duty • Present • Present • On Duty • Present • Present • Present • On Duty • On Duty • On Leave	BNI Meeting Room
11.	March 25, 2024	1. General Agenda, including Business Strategy Update 2. Anniversary Program 3. Technology Management Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
12.	April 1, 2024	1. Human Capital Committee 2. Anniversary Program 3. Progress of COP Division Business Process Update 4. Business Strategy Update	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
13.	April 22, 2024	1. Crisis Management Protocol for Liquidity Risk 2. Financial Performance Update	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present	BNI Meeting Room
14.	April 29, 2024	1. General Agenda, including Business Strategy Update 2. Technology Management Committee 3. Lebaran 2024 Support and Monitoring Operation Security Report	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present	BNI Meeting Room
15.	May 6, 2024	1. General Agenda, including: 1) Update Rapat Direksi 2) Business Strategy Update 2. Implementation of the PDP Law	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
16.	May 20, 2024	1. General Agenda, including: 1) BNI Java Jazz Festival 2024 Update 2) Launching wondr Update 2. Human Capital Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • On Duty	BNI Meeting Room
17.	May 28, 2024	1. General Agenda, including: Business Strategy Update 2. ALCO Committee 3. Procurement Agenda: 1) Proposed Procurement Authority 2)Proposed Procurement System Development 4. Human Capital Committee 5. Realization and Pipeline Credit Committee 6. Operations System Development	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
18.	June 3, 2024	1. BoD Compliance Training, AML, and OFAC 2. Discussion of Business Continuity Management Framework 3. General Agenda, including: 1) Impact of Tapera on BNI 2) Project Update 3) Business Strategy Update 4. Procurement Update: 1) Building Design Presentation 2) Outlet Design Presentation 3) Division/Unit Mapping	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
19.	June 10, 2024	1. Human Capital Committee 2. Corporate Banking and International Proposal 3. Subsidiary Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• On Duty • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • On Duty	BNI Meeting Room
20.	June 14, 2024	1. Revision of RBB 2024 2. Branch Office Mapping 3. Bank Credit Policy Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • On Duty • Present • Present • Present • On Duty	BNI Meeting Room
21.	June 24, 2024	1. General Agenda, including Financial Performance Update 2. Updates & Decisions on the BNI Corporate Transformation Program 3. Determination of the Top 50 BNI Best Employees 4. Digital Maturity Assessment for Banks 5. General Agenda, including Project updates	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
22.	July 1, 2024	1. Human Capital Committee 2. Request for Project Principle Permit Approval 3. ALCO Committee 4. General Agenda	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present	BNI Meeting Room
23.	July 9, 2024	1. General Agenda: 1) Update on Wonder Performance 2) Update on NTB Realization 2. Financial Performance Update 3. Update on the Board of Directors and Board of Commissioners Meeting Plan	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
24.	July 15, 2024	1. Human Capital Committee 2. General Agenda, including update wodnr Performance	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • On Leave • Present • Present • Present • Present • Present • Present • Present • On Duty	BNI Meeting Room
25.	July 22, 2024	1. Strategic Discussion of the Board of Directors and Board of Commissioners	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
26.	July 29, 2024	1. Corporate Action Plan Approval 2. ALCO Committee 3. Procurement Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
27.	August 7, 2024	1. Follow-up to the Corporate Action Approval Board of Directors Meeting 2. IKN Area Plan	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present • On Duty • Present	BNI Meeting Room
28	August 12, 2024	1. General Agenda 2. Subsidiary Update 3. Performance Update	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
29	August 19, 2024	1. General Agenda, including Follow-up Sharing Session 2. Technology Management Committee 3. ESG Sub Committee	• Royke Tumilaar • Putrama Wahju Setyawan* • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya* • Hussein Paolo Kartadjoemena* • Agung Prabowo* • Munadi Herlambang*	• Present • Permission • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
30	September 17, 2024	1. Procurement Committee 2. Update on POJK 13 of 2024 concerning Transparency of Basic Credit Interest Rates for Conventional Commercial Banks 3. Financial Performance Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • On Duty • Present • Present • On Duty • Present • On Duty • On Duty • Present • On Duty	BNI Meeting Room
31	September 23, 2024	1. Project Update 2. Wondr Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
32	September 30, 2024	1. Kick Off Meeting Audit 2024 2. Procurement Committee	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Permission • Present	BNI Meeting Room
33	October 7, 2024	1. Update on PDP Law related to Customer Approval 2. Financial Performance 3. ALCO Committee 4. CRM Development Plan 5. Update on BNIdirect Launching at BNI IDS 2024 Event	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo* • Munadi Herlambang*	• Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present • On Duty	BNI Meeting Room
34	October 14, 2024	1. Update on PDP Law Progress 2. Kick Off HC Roadmap	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present	BNI Meeting Room
35	October 15, 2024	1. Review of Decision-Making Authority 2. Evaluation of Outlet and ATM/CRM Productivity 3. Update on Annual Report and Sustainability Report 4. Update on wondr	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present	BNI Meeting Room
36	October 21, 2024	1. PDP Law Implementation Update 2. Savings Growth Strategy Update 3. BINNOVA 2024 Update 4. Human Capital Committee	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • On Duty • Present • Present • On Duty • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
37	October 28, 2024	1. General Agenda 2. Human Capital Committee Briefing 3. PDP Law Implementation Update 4. BNIdirect and Trade & Current Account Growth Strategy Update 5. Branch Transformation Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
38	November 4, 2024	1. Approval of RKAP 2025, RBB 2025 - 2027 & RKAB 2025 and RJPP 2025-2029, Collegial KPI 2025. 2. Update of Recovery Plan 2024/2025 Document 3. Technology Management Committee 4. BNI Culturefest 2024 Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
39	November 11, 2024	1. General Agenda, including Financial Performance Update October 2024 2. Savings Growth Strategy Update 3. ALCO Program for Third Party Funds and Foreign Exchange FNK 4. Komodo Project Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
40	November 18, 2024	1. Subsidiary Committee 2. wondr Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
41	November 25, 2024	1. General Agenda 2. Financial Performance Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Permission • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
42	December 2, 2024	1. Human Capital Committee 2. Technology Management Committee	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
43	December 6, 2024	1. Savings Balance Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
44	December 9, 2024	1. Proposed Policy of Government Regulation No. 47 of 2024 2. Discussion of PP on Bank Financial Reporting 3. ESG Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Permission • Present • On Duty • Present • Present • Present • Present • Present • Present • On Duty • Present • Present	BNI Meeting Room
45	December 19, 2024	1. Financial Performance Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • On Leave • Present • On Duty • On Leave • On Leave • Present • Present • Present • Present • Present • Present	BNI Meeting Room
46	December 23, 2024	1. Asset Revaluation Result 2024 2. Customer Fund Update 3. Online Gambling Handling Update	• Royke Tumilaar • Putrama Wahju Setyawan • Novita Widya Anggraini • Corina Leyla Karnalies • David Pirzada • Ronny Venir • Mucharom • Toto Prasetio • I Made Sukajaya • Hussein Paolo Kartadjoemena • Agung Prabowo • Munadi Herlambang*	• Present • On Leave • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

* Has not been effective

Meetings Scheduled in 2025 [ACGS D.3.1]

The plan for Board of Directors Meetings, which are scheduled to be held 12 (twelve) times in 2025, is as follows:

No.	Month	Agenda
1.	January	• Financial Performance Update • Sales Tools & Monitoring Update • Business and Operational Evaluation • Evaluation of ESG Implementation • Annual GMS Plan for Fiscal Year 2024 • Proposed Cash Dividend Performance for Fiscal Year 2024 • BNI Project Update • Liquidity Update • Financial Statements Update
2.	February	• Corporate Plan and RBB • Business Continuity Management • Investor Relations & BBNI Shares • MSME Business Review & Strategy
3.	March	• IT Architecture and Digitalization • Banking Operations • Human Resources Evaluation & Strategy • Corporate Banking Business Review & Strategy
4.	April	• Risk Management • Internal Control • Consumer Business Review & Strategy • Evaluation of Editing Policies, Funds and Services • Evaluation of ESG Implementation
5.	May	• Capital Participation • Evaluation of Subsidiary Company Performance • Integrated Risk Management & Governance • Evaluation & Remedial Recovery Strategy
6.	June	• Government, Risk, and Compliance • Review of Anti-Gratification & Anti-Bribery Policies • Evaluation of Office Networks & Digitalization of Services • Banking Ratios • Review of RBB Realization
7.	July	• Performance and Financial Evaluation • Performance and International Business Reviews • Treasury Business Review • Transformation • Big Data Evaluation and Strategy • Evaluation of ESG Implementation
8.	August	• Bank Capital • Assets & Liabilities • Review of Company Organizational Effectiveness • Review & Business Strategy for Institutional & Transactional Relations
9.	September	• Bank Income Evaluation and Strategy • Performance and Financial Evaluation • Digitalization and Anti-Cyber Crime Strategy
10.	October	• Human Resource Management Strategy • Banking Ratios • Evaluation of Bank Products & Services
11.	November	• Bank Asset Management • Business Innovation • Evaluation of Bank Products & Services
12.	December	• Performance and Financial Evaluation • Target Achievement Evaluation • Strategy & Transformation Evaluation • BNI Share Performance Evaluation • ESG Implementation Evaluation

Joint Board of Directors Meeting with the Board of Commissioners

In 2024, the Board of Directors held a meeting with the Board of Commissioners with a description of the agenda, date, and participation, as follows:

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
1.	January 18, 2024	**Board of Directors Meeting with the Board of Commissioners** 1. Closing Meeting Audit of fiscal year 2023 2. BNI Health Level as of December 31, 2023	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. Silvano Winston Rumantir 10. Muhammad Iqbal 11. Adi Sulistyowati 12. Sis Apik Wijayanto	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present 12. Present	Hybrid
2.	January 25, 2024	**Board of Directors Meeting with the Board of Commissioners** BNI Financial Performance as of December 31, 2023	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. Silvano Winston Rumantir 10. Muhammad Iqbal 11. Adi Sulistyowati 12. Sis Apik Wijayanto	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. On Duty 10. Present 11. On Duty 12. Present	Hybrid
3.	April 25, 2024	**Board of Directors Meeting with the Board of Commissioners** 1. BNI Financial Performance as of March 31, 2024 2. BNI Risk Profile position March 31, 2024	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. I Made Sukajaya 10. Hussein Paolo Kartadjoemena 11. Agung Prabowo 12. Munadi Herlambang*	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present 12. Present	Hybrid
4.	June 20, 2024	**Board of Directors Meeting with the Board of Commissioners** RBB BNI Revision 2024-2026	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. I Made Sukajaya 10. Hussein Paolo Kartadjoemena 11. Agung Prabowo 12. Munadi Herlambang*	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. On Duty 12. Present	Hybrid
5.	July 22, 2024	**Board of Directors Meeting with the Board of Commissioners** Board of Directors and Board of Commissioners strategic discussions	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. I Made Sukajaya 10. Hussein Paolo Kartadjoemena 11. Agung Prabowo 12. Munadi Herlambang*	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present 12. Present	Offline

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
6.	August 15, 2024	**Board of Directors Meeting with the Board of Commissioners** 1. BNI Performance, Subsidiaries, and RBB Realization for the Second Quarter/2024 Period 2. Board of Directors Collegial KPI for 2024	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. I Made Sukajaya 10. Hussein Paolo Kartadjoemena 11. Agung Prabowo 12. Munadi Herlambang*	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present 12. Present	Hybrid
7.	October17, 2024	**Board of Directors Meeting with the Board of Commissioners** 1. BNI Performance, Subsidiaries, and RBB Realization for the Third Quarter/2024 2. BNI Risk Profile as of September 30, 2024	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. I Made Sukajaya 10. Hussein Paolo Kartadjoemena 11. Agung Prabowo 12. Munadi Herlambang*	1. On Duty 2. Present 3. On Leave 4. Present 5. Present 6. Present 7. Present 8. Ex Duc 9. Present 10. Present 11. Present 12. Present	Hybrid
8.	November 14, 2024	**Board of Directors Meeting with the Board of Commissioners** Approval of RBB/RKAP 2025, RAKB 2025, RJP/Corporate Plan 2025-2029, and Board of Directors Collegial KPI 2025	1. Royke Tumilaar 2. Putrama Wahju Setyawan 3. Novita Widya Anggraini 4. Corina Leyla Karnalies 5. David Pirzada 6. Ronny Venir 7. Mucharom 8. Toto Prasetio 9. I Made Sukajaya 10. Hussein Paolo Kartadjoemena 11. Agung Prabowo 12. Munadi Herlambang*	1. Present 2. Present 3. Present 4. Present 5. On Duty 6. Present 7. On Duty 8. Present 9. Present 10. Present 11. Present 12. Present	Hybrid

*) Has not been effective

TRAINING AND/OR COMPETENCY IMPROVEMENT FOR THE BOARD OF DIRECTORS IN 2024

Continuous Training and/or Competency Development Policy [ACGS D.5.2]

BNI continues to strive to encourage a healthy and resilient banking business in order to achieve sustainable business growth and bring benefits to the organization and other stakeholders. In order to be able to make this happen, BNI is trying to build a solid business foundation by ensuring the quality of competence and leadership at the top of management.

Annually, BNI prepares a plan for the Board of Directors' Competency Development Program by highlighting learning topics that are adapted to the latest macroeconomic developments, dynamics of the banking industry, and continuously evolving governance. This program generally takes the form of competency enhancement activities or knowledge refreshment for the Board of Directors through Executive Education activities, certification, and other activities carried out in the context of competency improvement.

As regulated in the Board of Directors' Work Guidelines and Procedures, every member of the Board of Directors has the right and obligation to take part in the Board of Directors' Competency Development Program, whether implemented internally by the Bank, implemented by the Bank in collaboration with other parties (expertise), or involving the Board of Directors in competency improvement programs organized by other parties. Through this program, the Bank expected that the daily duties and responsibilities of the Board of Directors could be carried out better, which in turn could also encourage effective management of the Bank.

Training and/or Competency Improvement in Financial Year 2024 [ACGS D.5.2]

In order to ensure that members of the Board of Directors understand the roles and responsibilities, characteristics, and operations of the Bank and understand developments in regulations and standards relevant to the Bank's business, in 2024, all members of the BNI Board of Directors have participated in the following training and/or competency development activities:

Training and/or Competency Improvement in Financial Year 2024

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
Royke Tumilaar - President Director					
1	CEO Talk ITB 2024: Becoming An Entrepreneur	February 21, 2024	Bandung	Enterpreneurship	Institut Teknologi Bandung (ITB)
2	Banking Risk Management Certification Qualification 7	April 22, 2024	Jakarta	Risk	Banking Professional Certification Institute (LSPP)
3	Executive Course Strategic Management & Leadership	July 24 - August 6, 2024	Jakarta	Leadership	Universitas Pertahanan RI
4	As a Resource Person for OJK: Advanced Level Leadership Development (The Impact of Global Mindset of Financial Industry)	21 August 2024	Jakarta	Leadership	Otorisasi Jasa Keuangan (OJK)
5	As Resource Person for BUMD Leaders Forum	September 30, 2024	Jakarta	Economic	BUMD Jakarta
6	Power Lunch: Money Talks	October 2, 2024	Jakarta	Economic	CNBC Indonesia
7	Branch Management Course	October 1, 2024	Jakarta	Leadership	PT Bank Negara Indonesia (Persero) Tbk
8	Book Launching "Red Magician from the Pacific" by Mr. Olly Dondokambey (Governor of North Sulawesi)	October 14, 2024	Jakarta	Enterpreneurship	Tribun Manado
9	Interview by Kontan	November 28, 2024	Jakarta	Enterpreneurship	Kontan
Putrama Wahju Setyawan - Deputy President Director					
1	Earnings Call dan Press Conference FY2023	January 26, 2024	Grha BNI Lt. 25 Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	Business Meeting W.16	February 2-3, 2024	Sorong	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Sharing Session Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
4	BRI Microfinance Outlook 2024	March 7, 2024	Ballroom Menara BRILiaN	Workshop	PT Bank Negara Indonesia (Persero) Tbk
5	Leadership Forum	March 8-10, 2024	Hotel Tentrem, Yogyakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
6	Banking Risk Management Training Program Qualification 7	April 1, 2024	Grha BNI Lt. 30 Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk
7	Assessment SMR 7	April 22, 2024	Grha BNI Lt. 29 Jakarta	Certification	Lembaga Sertifikasi Profesional Perbankan (LSPP)
8	Earnings Call ans Press Conference 1Q-2024	April 29, 2024	Gedung BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
9	Board Retreat BNI Semester I Tahun 2024	May 8-12, 2024	London, UK	Workshop	PT Bank Negara Indonesia (Persero) Tbk
10	Pelatihan Quick Win 2.0 - Wave 2	June 15, 2024	Ciwidey, Bandung	Training	PT Bank Negara Indonesia (Persero) Tbk
11	Executive course on strategic management and leadership cohort #2	July 3-16, 2024	Jakarta	Training	Universitas Pertahanan RI

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
12	University of Birmingham Alumni Association Networking Session	July 24, 2024	Jakarta, Menara BNI Pejompongan	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
13	Compliance Forum "Creating an Anti-Corruption Culture through Instilling Integrity Values"	August 14, 2024	Grha BNI Lt. 25 Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
14	Reinforcement Business Team Leader Batch 8-12 2024	August 16, 2024	Ciwidey, Bandung	Training	PT Bank Negara Indonesia (Persero) Tbk
15	Earnings Call and Press Conference 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	Forum Group Discussion with Bank Mandiri, BRI and Commission XI of the Indonesian House of Representatives	August 27, 2024	Jakarta, Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Board Retreat	September 4 - 8, 2024	Sidney	Workshop	PT Bank Negara Indonesia (Persero) Tbk
18	Deputy Minister of State-Owned Enterprises Workshop	September 13, 2024	Jakarta, Auditorium Indraprasta, Gedung Nawasena Mandiri University	Workshop	Ministry of State-Owned Enterprises (BUMN)
19	Investor Daily Summit 2024	October 8-9, 2024	JCC Senayan, Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
20	Earnings Call dan Press Conference 3Q-2024	October 25, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
21	Risk Management Certification Alignment	November 7, 2024	Shangrila Hotel - Jakarta	Workshop	IRPA (Indonesian Risk Professional Association)
22	Hearing Meeting with Commission VI of the Indonesian House of Representatives	November 13, 2024	Gedung Nusantara I Lt.1	Sharing Session	House of Representatives of the Republic of Indonesia (DPR RI)
23	BNI Culture Fest 2024	November 14, 2024	Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
24	Joint Group Discussion Forum with Bank Mandiri, BRI, BTN and Commission XI of the Indonesian House of Representatives	December 2, 2024	Menara BNI Pejompongan	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
	Novita Widya Anggraini - Finance Director				
1	Ministry of State-Owned Enterprises Workshop	January 19, 2024	Bali Beach Convention,KEK, Sanur	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	Earning Calls & Press Conference Full Year 2023	January 26, 2024	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Joint Group Discussion Forum with Commission XI of the Indonesian House of Representatives	February 1, 2024	Ballroom Menara BNI Pejompongan, Jakarta	FGD	PT Bank Negara Indonesia (Persero) Tbk
4	Business Meeting W10 Tahun 2024	February 2, 2024	Pullman Ciawi Vimala Hills	Resource Person	PT Bank Negara Indonesia (Persero) Tbk
5	INT Summit	February 2, 2024	Hotel Borobudur	Resource Person	PT Bank Negara Indonesia (Persero) Tbk
6	Afternoon Discussion with the Theme "Domestic Political Developments Towards the 2024 Election"	February 7, 2024	Grha BNI Lt. 25 Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
7	CFO Leadership Program (executif program by McKinsey)	February 12-16, 2024	Harvard Business School	Training	McKinsey
8	Sharing Session Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
9	Leadership Forum	March 9, 2024	Hotel Tentrem, Yogyakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
10	Program Money Talks Power Lunch CNBC	April 2, 2024	Studio CNBC	Resource Person	CNBC Indonesia
11	Banking Risk Management Training Program Qualification 7	April 1, 2024	GRHA BNI Lt. 30 Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk
12	Assessment SMR 7	April 22, 2024	GRHA BNI Lt. 29 Jakarta	Certification	Banking Professional Certification Institute (LSPP)
13	Board Retreat BNI Semester I Tahun 2024	May 8-12, 2024	London, UK	Workshop	PT Bank Negara Indonesia (Persero) Tbk
14	Earnings Call dan Press Conference 1Q-2024	April 29, 2024	Gedung BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
15	CFO Forum (Climate Change Threatens Economy and Business, These are the Financial Strategies of CFOs) - CNBC Indonesia	June 12, 2024	Video Conference	Resource Person	CNBC Indonesia Indonesia
16	Working Visit of the Regional Board of Commissioners 17	June 30, 2024	Hotel Royal Ambarukmo	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Becoming a Panelist in the Indonesia Women in Finance Conference (Empowering Women by Embracing Technology)	August 15, 2024	Financial Hall, Graha CIMB Niaga Lantai 2	Resource Person	CFA Society Indonesia
18	Earnings Call dan Press Conference 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
19	Compliance Forum "Realizing Anti-Corruption Culture Through Instilling Integrity Values"	August 14, 2024	Grha BNI Lantai 25	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
20	Workshop of Deputy Minister of SOEs "SOE's Strategic Program and Risk Management for Indonesia's Future"	September13, 2024	Mandiri University Campus Wijayakusuma	workshop	Kementerian Badan Usaha Milik Negara (BUMN)
21	Investor Daily Summit 2024	October 8, 2024	JCC Senayan	Seminar	PT Bank Negara Indonesia (Persero) Tbk
22	Earnings Call and Press Conference 3Q-2024	October 25, 2024	Ballroom BNI Mataram	Jakarta	PT Bank Negara Indonesia (Persero)
23	Nomura x Verdhana Indonesia Conference 2024	November 8, 2024	St Regis Jakarta	Conference	Verdhana Indonesia
24	CEO Netwoking 2024 "Navigating Global Market Forces and Technology Innovation for Sustainable business"	November 26, 2024	Dian Ballroom, Raffles Hotel Jakarta	Seminar	Pasar Modal Indonesia
25	BoD Level 7 Alignment	November 7, 2024	Hotel Shangrila Jakarta	Seminar	Indonesian Risk Proffesional Association
	Corina Leyla Karnalies - Retail Banking Director				
1	Business Meeting Regional 18	January 19, 2024	Vidcon - Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	Workshop Wholesale Digital Channel	January 19, 2024	Rafless Hotel Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Earnings Call and Press Conference Full Year 2023 Performance	January 26, 2024	Vidcon - Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
4	Event Indonesia Corporated Day - Collaboration Toward SOEs Go Global	January 27, 2024	The Laguna Nusa Dua, Bali	Seminar	PT Bank Negara Indonesia (Persero) Tbk
5	Forum Group Discussion with Commission XI DPR RI	February 1, 2024	Ballroom Menara BNI Pejompongan, Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
6	Executive Gathering Asosiasi Sistem Pembayaran Indonesia Tahun 2024 - Elevating The National Payment System Through Collaborative Synergy	February 2, 2024	The Apurva Kempinski, Bali	Workshop	PT Bank Negara Indonesia (Persero) Tbk
7	Afternoon Discussion with the Theme "Domestic Political Developments Towards the 2024 Election"	February 7, 2024	Grha BNI Lt. 25 Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
8	Business Alignment Meeting Sektor DIT 2024	February 21, 2024	Nusantara Ballroom, The Darmawangsa	Workshop	PT Bank Negara Indonesia (Persero) Tbk
9	Sharing Session Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
10	Resource Person for Fortune Indonesia Luncheon: Empowering Women with AI (Women's Strategic Role on Advancing AI for Inclusive Growth)	March 7, 2024	The Tribrata Darmawangsa, The Chora Room	Seminar	Fortune Indonesia
11	Business Meeting "Synergize and Streamline: Elevating Productivity and Performance"	March 8, 2024	Hotel Tentrem, Yogyakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
12	Leadership Forum	March 9, 2024	Hotel Tentrem, Yogyakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
13	Banking Risk Management Training Program Qualification 7	April 1, 2024	GRHA BNI Lt. 30 Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk
14	Assessment SMR 7	April 22, 2024	GRHA BNI Lt. 29 Jakarta	Certification	Banking Professional Certification Institute (LSPP)
15	Speaker of Kelana Wastra Fest Fashion Talkshow for Indonesia 2024 - Creative Financing: Delving into the Needs of Fashion MSMEs	April 26, 2024	Gedung Sarinah, Jakarta	Seminar	Indonesian Women's PIMTI Association
16	Earnings Call dan Press Conference 1Q-2024	April 29, 2024	Gedung BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Workshop Internalisasi BNI Culture Transformation via Vidcon	May 3, 2024	Vidcon - Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
18	Board Retreat BNI Semester I Tahun 2024	May 8 - 12, 2024	London, UK	Workshop	PT Bank Negara Indonesia (Persero) Tbk
19	Facilitator of SESPIBANK Program Class of 78 2024	May 17, 2024	Ruang Kemang, Lantai 3 LPPI	Workshop	PT Bank Negara Indonesia (Persero) Tbk & Indonesian Banking Development Institute (LPPI)
20	Resource Person for Discussion Forum - "Challenges and Potentials of Empowering MSMEs in Supporting the Realization of the Vision of Golden Indonesia 2045"	July 11, 2024	Hotel Fairmont, Jakarta	Forum Group Discussion	Financial Services Authorization (OJK)
21	Compliance Forum "Creating an Anti-Corruption Culture Through Instilling Integrity Values"	14 August 2024	Grha BNI Lantai 25	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
22	Earnings Call dan Press Conference 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
23	Joint Group Discussion Forum with Bank Mandiri, BRI, and Commission XI of the Indonesian House of Representatives	August 27, 2024	Ballroom Menara BNI Pejompongan, Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
24	Board Retreat BNI	September 5-8, 2024	Sydney, Australia	Workshop	PT Bank Negara Indonesia (Persero) Tbk
25	Sharing Session Global Banking Trends	September 10, 2024	Grha BNI Lantai 33	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
26	Securities Company Ecosystem Discussion Group Forum	September 18, 2024	Grha BNI Lantai 25	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
27	Speaker BNI Investor Daily Summit 2024 - Personal Finance & Investment	October 9, 2024	JCC, Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk & B-Universe
28	Workshop Business Plan 2025 Division CRD	October 18, 2024	Harper by Aston, Jogjakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
29	Earnings Call dan Press Conference 3Q-2024	October 25, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
30	Risk Management Certification Alignment	November 7, 2024	Hotel Shangrila, Jakarta	Workshop	IRPA (Indonesian Risk Professional Association)
31	Workshop All GM Sektor REB	November 12, 2024	Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
32	BNI Culture Fest 2024	November 14, 2024	Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
33	Sharing Session dengan PW	November15, 2024	Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
	David Pirzada - Risk Management Director				
1	Ministry of SOEs Workshop	January 19, 2024	Bali Beach Convention, KEK Sanur	Workshop	Ministry of State-Owned Enterprises (SOEs)
2	BNI Culture Transformation Internalization Workshop Risk Management Sector	January 24, 2024	Wisma 46, Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Joint Group Discussion Forum with Commission XI of the Indonesian House of Representatives	February 1, 2024	Ballroom Menara BNI Pejompongan, Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
4	INT Summit: Breaking Silos, Building Bridges: A Symphony of Business Collaboration	February 2, 2024	Hotel Borobudur, Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
5	Afternoon Discussion: "Domestic Political Developments Towards the 2024 Election"	February 7, 2024	Grha BNI Lt. 25 Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
6	Artificial Intelligence Sharing Session by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
7	Indonesian Banking Road to Net Zero Emission	March 4, 2024	St. Regis Hotel, Jakarta	Seminar	Financial Services Authority (OJK)
8	18th Asia Pacific High Level Meeting on Banking Supervision	March 5-8, 2024	Tokyo, Japan	Seminar	Financial Services Authority (OJK)
9	Hearing with Commission VI of the Indonesian House of Representatives	March 20, 2024	Gedung Nusantara I Lt. 1 Jakarta	Sharing Session	House of Representatives of the Republic of Indonesia (DPR RI)
10	SMR 7 Assessment	April 22, 2024	Grha BNI Lt. 29 Jakarta	Certification	Banking Professional Certification Institute (LSPP)
11	Hearing with Commission VI of the Indonesian House of Representatives	Juy 8, 2024	Gedung Nusantara I Lt. 1 Jakarta	Sharing Session	House of Representatives of the Republic of Indonesia (DPR RI)
12	Refreshment Commercial Credit Risk Batch I 2024	July 12-13, 2024	Hotel Ibis Style, Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk
13	Refreshment Commercial Credit Risk Batch II 2024	July 19-20, 2024	Hotel Ibis Style, Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
14	Refreshment Commercial Credit Risk Batch III 2024	August 9-10, 2024	Hotel Ibis Style, Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk
15	Compliance Forum "Realizing Anti-Corruption Culture Through Instilling Integrity Values"	August 14, 2024	Grha BNI Lantai 25	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
16	Forum Group Discussion with Bank Mandiri, BRI, and Commission XI of the Indonesian House of Representatives	August 27, 2024	Ballroom Menara BNI Pejompongan, Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
17	5th BARa General Meeting of Members (RUA) in 2024	August 29, 2024	Mandiri Club, Jakarta	-	Bankers Association for Risk Management (Bankers Association for Risk Management (BARA))
18	Workshop on Alignment of Company Guidelines (PP) for Operational Risk Management	September 10, 2024	Gedoeng BNI Kota	Workshop	PT Bank Negara Indonesia (Persero) Tbk & KPK
19	Sharing Session Global Banking Trends	September 10, 2024	Grha BNI Lantai 33	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
20	Deputy Minister of SOEs Workshop "SOE's Strategic program and Risk Management for Indonesia's Future"	September 13, 2024	Auditorium Indraprasta Gedung Nawasena Mandiri University	Workshop	Ministry of State-Owned Enterprises (BUMN)
21	Anugerah ESG Republika 2024	September 19, 2024	The Westin Hotel	ESG	Republika
22	Blue Ocean Strategy Programme	October 7-10, 2024	INSEAD Business School - Fontainebleu, Perancis	Executive Education	INSEAD Business School
23	IFG Acara Risk Management Summit: Navigating Risks Towards Business Resiliency and Sustainability by Indonesia Financial Group	October 14, 2024	Ritz Carlton Pacific Place	Seminar	Indonesia Financial Group (IFG)
24	Level 7 BoD Risk Management Certification Equalization & Alignment Seminar	October 23-24, 2024	Sheraton Grand Jakarta	Seminar	IRPA (Indonesian Risk Professional Asscociation)
25	Paviliun Indonesia COP29 UNFCCC: Sustainably Stronger Together	November11-22, 2024	Baku, Azerbaijan	Seminar	Kementerian Lingkungan Hidup dan Kehutanan
26	Forum Group Discussion with Bank Mandiri, BRI, BTN and Commission XI DPR RI	December 2, 2024	Menara BNI Pejompongan	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
27	RDP of Committee IV DPD RI: Follow-up of Bad Debt Write-off	December 3, 2024	Secretariat General of DPD RI	Forum Group Discussion	Committee IV DPD RI
		Ronny Venir - Network and Services Director			
1	Earning Calls & Press Conference Full Year 2023	26 Jan 24	Grha BNI Lt. 25 Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	Joint Group Discussion Forum with Commission XI of the Indonesian House of Representatives	February 1, 2024	Ballrom Menara	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Power Lunch CNBC	January 11, 2024	Lt 3 CNBC Studio CNBC	Sharing Session	CNBC Indonesia Indonesia
4	Business Meeting Region 12	January 12, 2024	Sheraton Bandung	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
5	Business Meeting Region 18	January 18, 2024	Grand Mercure Malang	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
6	Business Meeting Region 14, 02	January 19, 2024	Aston Sentul	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
7	Invitation of Resource Persons for Financial Education Activities for Students in South Jakarta Area	January 22, 2024	Auditorium Indonesia Banking School	Sharing Session	Otorisasi Jasa Keuangan (OJK)
8	FGD in the context of Implementing the Strategy for Implementing Financial Literacy and Inclusion Activities in 2024	January 26, 2024	R Merah Putih Plataran	FGD	Otorisasi Jasa Keuangan (OJK)
9	Business Meeting Region 04, 01, 15	January 27, 2024	Holiday Inn Pasteur Bandung	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
10	Business Meeting Region 10, 07, 16, 17	February 01, 2024	Gedung Ten Terrace	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
11	BNI Business Meeting 2024	March 08-10, 2024	Yogyakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
12	Financial Planning Education For Hongkong's Diaspora	February 25, 2024	Hongkong	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
13	Artificial Intelligence Sharing Session by Microsoft	February 27, 2024	Grha BNI Lt. 25	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
14	Banking Risk Management Briefing Program Qualification 7	April 22, 2024	Grha BNI Lt. 29 R. Rapat 2	Sertifikasi SMR	PT Bank Negara Indonesia (Persero) Tbk
15	BNI Board Retreat Semester I 2024	May 8-12, 2024	London, UK	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	Working Visit with the Board of Commissioners to W04	May 27, 2024	Kantor Wilayah 04	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
17	Earnings Call and Press Conference 1Q-2024	April 29, 2024	Gedung BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
18	Working Visit with the Board of Commissioners to W18	July 30, 2024	Kantor Wilayah 18	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
19	Earnings Call and Press Conference 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
20	Compliance Forum "Realizing Anti-Corruption Culture Through Instilling Integrity Values"	August 14, 2024	Grha BNI Lantai 25	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
21	Workshop of Deputy Minister of SOEs "SOE's Strategic Program and Risk Management for Indonesia's Future"	September 13, 2024	Mandiri University Campus Wijayakusuma	workshop	Ministry of State-Owned Enterprises (BUMN)
22	Executive Education BoD & BoC - Tech EX AI & Big Data Expo	October 1-2, 2024	Amsterdam, Netherlands	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
23	Overseas Office Amsterdam Working Visit	October 3, 2024	Amsterdam, Netherlands	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk & KPK
24	Overseas Office London Working Visit	October 5, 2024	London	workshop	PT Bank Negara Indonesia (Persero) Tbk & KPK
25	Investor Daily Summit 2024	October 8 - 9, 2024	JCC Senayan	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
	Mucharom - Human Capital and Compliance Director				
1	Business Meeting Region 02	January 19, 2024	Pangeran Hotel Pekanbaru	Source person	PT Bank Negara Indonesia (Persero) Tbk
2	Earnings Call and Press Conference FY2023	January 26, 2024	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Forum Group Discussion with Commission XI of the Indonesian House of Representatives	February 1, 2024	Ballroom Menara BNI Pejompongan, Jakarta	FGD	PT Bank Negara Indonesia (Persero) Tbk
4	Business Meeting Region 17	February 2-3, 2024	The Phoenix Hotel Yogyakarta	Source person	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
5	Afternoon Discussion with the Theme "Domestic Political Developments Towards the 2024 Election"	February 7, 2024	Grha BNI Lt. 25 Jakarta	FGD	PT Bank Negara Indonesia (Persero) Tbk
6	Focus Group Discussion Development Program for Top Talent BOD-1	February 23, 2024	Ruang Hybrid 30 - Menara Brillian, Jakarta Selatan	FGD	Ministry of State-Owned Enterprises (BUMN)
7	Sharing Session Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
8	Sharing Session & Direction - AFR Business Meeting	February 28, 2024	Grha BNI Lt. 25 Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
9	Facilitator - Onboarding Training Program for Experience Hire Level Executive	February 28, 2024	Online	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
10	BUMN Corporate Communication and Sustainability Summit (BCOMSS) 2024	March 7, 2024	Tennis Indoor Senayan, Jakarta	Workshop	Ministry of State-Owned Enterprises (BUMN)
11	Specific Working Visit of Commission XI of the Indonesian House of Representatives	March 14, 2024	Bandung	Sharing Session	Otorisasi Jasa Keuangan (OJK)
12	PERBANAS Outlook Seminar 2024	March 22, 2024	Bali Room Hotel Indonesia Kempinski, Jakarta Pusat	Seminar	Perhimpunan Bank-Bank Nasional (Perbanas)
13	Resource Person Sharing Session FHCI - Unlocking Global Opportunities: Key Insights for Business Savvy Professionals	March 28, 2024	Online	Sharing Session	Forum Human Capital Indonesia (Forum Human Capital Indonesia (FHCI))
14	Banking Risk Management Briefing Program Qualification 7	April 1, 2024	Grha BNI Lt. 30 Jakarta	Training	PT Bank Negara Indonesia (Persero) Tbk
15	Earnings Call and Press Conference 1Q-2024	April 29, 2024	Gedung BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	SMR 7 Assessment	May 6, 2024	Grha BNI Lt. 31 Jakarta	Certification	Banking Professional Certification Institute (LSPP)
17	BNI Board Retreat Semester I 2024	May 8-12, 2024	London, UK	Workshop	PT Bank Negara Indonesia (Persero) Tbk
18	Accompanying the Working Visit of Commission VI of the Indonesian House of Representatives	May 15-20, 2024	Belanda	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
19	BOD Talk - BNI Best Employee Bootcamp 2024	June 12, 2024	BNI University, Gedoeng BNI Kota	Workshop	PT Bank Negara Indonesia (Persero) Tbk
20	RACE Talk Series: Creating Impactful Innovation through Culture Transformation	June 12, 2024	Studio BNI University, Gedoeng BNI Kota	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
21	Virtual Seminar #100 POJK 5/2024: Strengthening Banking Foundations Amidst Global Volatility	July 26, 2024	Online	Seminar	Indonesian Banking Development Institute (LPPI)
22	Working Visit of Commission VI of the Indonesian House of Representatives	August 2-3, 2024	Denpasar	Sharing Session	Ministry of State-Owned Enterprises (BUMN)
23	Working Visit of Commission XI with BUMN Directors	August 5, 2024	Denpasar	Sharing Session	Ministry of State-Owned Enterprises (BUMN)
24	Providing Directions to Participants of the Reinforcement Business Team Leader Training Batch 3-7 in 2024	August 9, 2024	BP3KSDMT Kementerian Perhubungan, Bandung	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
25	Forum Group Discussion Human Capital Architecture	August 13, 2024	Gedung Kementerian BUMN	Workshop	Ministry of State-Owned Enterprises (BUMN)
26	Compliance Forum "Creating Anti-Corruption Culture Through Instilling Integrity Values"	August 14, 2024	Grha BNI Lantai 25	Seminar	PT Bank Negara Indonesia (Persero) Tbk & KPK
27	Earnings Call and Press Conference 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
28	As Speaker in the Talk Show "UGM and KAGAMA Synergy"	August 27, 2024	Grha Sabha Pramana, UGM	Sharing Session	Universitas Gadjah Mada (UGM)
29	Joint Group Discussion Forum with Bank Mandiri, BRI, and Commission XI of the Indonesian House of Representatives	August 27, 2024	Ballroom Menara BNI Pejompongan, Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
30	Opening Workshop Legal Refreshement for In House Legal Counsel BNI Tahun 2024	August 30, 2024	BNI University Jl. Lada, West Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
31	BNI Board Retreat	September 5-8, 2024	Sydney, Australia	Workshop	PT Bank Negara Indonesia (Persero) Tbk
32	Workshop of Deputy Minister of SOEs	September 13, 2024	Auditorium Indraprasta, Gedung Nawasena Mandiri University, Jakarta Barat	Workshop	Ministry of State-Owned Enterprises (BUMN)
33	Executive Education 2024: Leading Change & Organizational Renewal	September 15-20, 2024	Palo Alto, USA	Training	PT Bank Negara Indonesia (Persero) Tbk
34	Investor Daily Summit 2024	October 8-9, 2024	JCC Senayan, Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
35	Earnings Call and Press Conference 3Q-2024	October 25, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
36	Speakers at Training for BOD-2 Leaders Development Mission: "Strategic People Leaders with Core Values AKHLAK"	November 01, 2024	Menara BNI Pejompongan	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
37	Resource person at the KPK Workshop "Best Practice APU Program in Banking: Financial Services Sector Perspective in Implementing the APU PPT Program"	November 13, 24	Atria Hotel Gading Serpong, Tangerang	Workshop	Komisi Pemberantasan Korupsi Republik Indonesia
38	Kick Off HC Match Making FHCI	November14, 2024	Menara BNI Pejompongan	Sharing Session	Forum Human Capital Indonesia (FHCI)
39	Specific Working Visit of Commission XI of the Indonesian House of Representatives	November 20-21, 2024	Semarang	Sharing Session	Dewan Perwakilan Rakyat Republik Indonesia
40	Welcome Remarks Seminar KAGAMA MBA "Implementation Of Green Economy Principles as a Catalyst Towards Indonesia Emas"	November 23, 2024	Menara BNI Pejompongan	Sharing Session	KAGAMA - MBA
41	Speaker at the 2024 Indonesia Good Governance Award (GCG Award) Event	November 25, 2024	Ballroom A & B, Hotel Shangri-La, Jakarta	Sharing Session	SWA Media Grup dan IICG
	Toto Prasetio - Technology & Operations Director				
1	CES (Consumer Technology Association) 2024	January 8-10, 2024	Las Vegas, US	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	Business Summit STA Division	January 19, 2024	Anyer	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Business Summit Region W.15	January 26, 2024	Royal Tulip Gunung Geulis	Workshop	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
4	Business Summit ADV Division	January 27, 2024	Sentul	Workshop	PT Bank Negara Indonesia (Persero) Tbk
5	Earnings Call and Press Conference FY2023	January 26, 2024	Grha BNI	Workshop	PT Bank Negara Indonesia (Persero) Tbk
6	Joint Group Discussion Forum with Commission XI of the Indonesian House of Representatives	February 1, 2024	Menara BNI	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
7	STA Division Leadership Meeting	February 2, 2024	Menara BNI	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
8	Business Summit W09	February 16, 2024	Novus Hotel Bogor	Workshop	PT Bank Negara Indonesia (Persero) Tbk
9	CTO Talk - CNBC Indonesia	July 1, 2024	Vidcon	Source person	CNBC Indonesia Indonesia
10	Launching wondr	July 1, 2024	Grha BNI Lt. 25 Jakarta	Launching	PT Bank Negara Indonesia (Persero) Tbk
11	Infobank Media Group	July 2, 2024	Kempinsky Jakarta	Workshop	Infobank
12	IBM AI SUmmit Indonesia	August 8, 2024	Ritz Carlton PP	Panel	International business machines corporation (IBM)
13	Fordigi Summit	September 25, 2024	Hotel Mulia Senayan	Workshop	Fordigi
14	Forum Group Discussion with Bank Mandiri, BRI, and Commission XI of the Indonesian House of Representatives	August 27, 2024	Ballroom Menara BNI Pejompongan, Jakarta	Forum Group Discussion	PT Bank Negara Indonesia (Persero) Tbk
15	Board Retreat BNI	September 5-8, 2024	Sydney, Australia	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	Executive Education	October 15-17, 2024	Columbia University, USA	Training	ColumBank Indonesiaa University, USA
17	Sibos	October 21-14, 2024	China National Convention Centre	Conference	Beijing, China
18	Welcome Reception Golf Indonesian Master	October 29, 2024	Royal Golf	Conference	PT Bank Negara Indonesia (Persero) Tbk
19	Citicon Inauguration	October 31, 2024	Citicon Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
20	Chatting with ODP Operations	November 01, 2024	Wisma 46 lantai 3	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
21	Executive Leadership Forum 2024 - Adapting to uncertainly: empowering business resilience in a dynamic era	November 06, 2024	Thamrin nine	Conference	ICIO
22	Ahlak Culture Fest 2024	November 14, 2024	Ballroom Menara	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
23	BI Bi-Fast Socialization	November 21, 2024	Vidcon	Sharing Session	Bank Indonesia
I Made Sukajaya - Enterprise and Commercial Banking Director					
1	Effective Collaborative Leadership & Collection Strategy Training	January 12, 2024	Hotel Sendal Wood & Boutiq Lembang Bandung	Training	PT Bank Negara Indonesia (Persero) Tbk
2	Determination of Limit Value in Auction Implementation	January 08, 2024	Hotel tantrem Yogyakarta	Seminar	Directorate General of State Assets (DJKN)
3	Earnings Call and Press Conference FY2023	January 26, 2024	Grha BNI Lt. 25 Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
4	Internalization of BNI Culture Transformation RMT Sector	January 24, 2024	Wisma BNI46	Workhop	PT Bank Negara Indonesia (Persero) Tbk
5	Sharing Session Artificial Intelligence by Microsoft	February 27, 2024	Grha BNI Lt. 25 Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
6	Leadership Forum	March 08-10, 2024	Hotel Tentrem, Yogyakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
7	Sharing session property market overview	March 06, 2024	BNI Menara Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
8	SMR Level 7	April 01, 2024	BNI	Certification	Banking Professional Certification Institute (LSPP)
9	IFG-BUMN Gathering & Engagement 2024	March 26, 2024	Royal Gladd House lt.2 Park Hyatt Jakarta	Workshop	Indonesia Financial Group (IFG)
10	SMR 7 Assessment	April 1, 2024	Grha BNI Lt. 29 Jakarta	Certification	Banking Professional Certification Institute (LSPP)
11	Earnings Call and Press Conference 1Q-2024	April 29, 2024	Gedung BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
12	Culture Transformation Workshop online	01 May 2024	BNI	Workshop	PT Bank Negara Indonesia (Persero) Tbk
13	BNI Board Retreat Semester I 2024	08-12 May 2024	London, UK	Workshop	PT Bank Negara Indonesia (Persero) Tbk
14	BNI Best Employee Booth Camp 2024 Speaker-Leadership Session	12 June 2024	BNI University Kota	Workshop	PT Bank Negara Indonesia (Persero) Tbk
15	Compliance Forum "Creating an Anti-Corruption Culture Through Instilling Integrity Values"	August 14, 2024	Grha BNI Lt. 25 Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
16	Earnings Call and Press Conference 2Q-2024	August 22, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Board Retreat	September 04-08, 2024	Sydney	Workshop	PT Bank Negara Indonesia (Persero) Tbk
18	Talent Development Coaching & Mentoring	September 04, 2024	Grha BNI Lt. 30	Forum Discussion	PT Bank Negara Indonesia (Persero) Tbk
19	Sharing Session Global Banking Trends 2024	September 10, 2024	Grha BNI Lt.33	Seminar	PT Bank Negara Indonesia (Persero) Tbk
20	Steering Comminte Avatar	September 11, 2024	Grha BNI Lt.25	Forum Discussion	BCG
21	Executive Education: Leading & Sustaining a Culture of Innovation	September 16-19, 2024	Kellog School, Chicago US	Training	PT Bank Negara Indonesia (Persero) Tbk
22	IDX Summit 2024 Speakers: Themed "Local Gov Effort to Attract Foreign Domestic Investment"	October 09, 2024	JCC	Speaker	B Universe
23	Earnings Call and Press Conference 3Q-2024	October 25, 2024	Ballroom BNI Mataram	Workshop	PT Bank Negara Indonesia (Persero) Tbk
24	Risk Management Certification Alignment Program 1 (one) Time a Year	Novermber 07-08, 2024	Hotel Shangrila Jakarta	Certification	Bankers Association for Risk Management (BARA)
25	RDP Commission VI DPR RI	November 13, 2024	GD Nusantara - DPR RI	Forum Discussion	House of Representatives of the Republic of Indonesia
26	Culture Fest with KBUMN	November 14, 2024	Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
27	Board of Commissioners Working Visit in the Commercial Segment	November 14, 2024	Grha BNI Lt.25	Forum Discussion	PT Bank Negara Indonesia (Persero) Tbk
28	FGD with Commission XI of the DPR	December 02, 2024	Menara BNI Pejompongan	Workshop	PT Bank Negara Indonesia (Persero) Tbk
29	RDP Himbara	December 03, 2024	Sekretariat Jenderal DPD RI	Forum Discussion	House of Representatives of the Republic of Indonesia

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
Hussein Paolo Kartadjoemena - Digital and Integrated Transaction Banking Director					
1	BNI Culture Transformation Internalization Workshop	January 26, 2024	Wisma 46	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	FGD with Commission XI of the Indonesian House of Representatives	February 01, 2024	Menara BNI	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
3	Financial Services Industry Annual Meeting 2024 "Strong and Stable Financial Services Sector to Support Sustainable Economic Growth"	February 20, 2024	Online - Zoom	Sharing Session	Financial Services Authority (OJK)
4	Artificial Intelligence Sharing Session by Microsoft for Directors and SEVPs	February 27, 2024	Grha BNI	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
5	Kick Off and Participation in Bank Indonesia Hackathon 2024	March 29, 2024	Kempinski	Sharing Session	Bank Indonesia
6	Race Talk Series: Creating Impactful Innovation Through Culture Transformation	June 12, 2024	Studio BNI University	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
7	BSI International Expo "Connecting You to Halal Lifestyle Ecosystem"	June 20, 2024	JCC Senayan	Workshop	Bank Syariah Indonesia (BSI)
8	Grand Pitching BINNOVA 2022 - 2023	June 25, 2024	Grha BNI	Forum	PT Bank Negara Indonesia (Persero) Tbk
9	CNN Speaker (The Big Idea with Desi Anwar)	June 28, 2024	Studio CNN	Forum	CNN Indonesia
10	BI and Coordinating Ministry for Economic Affairs Invitation for FEKDI Event "Digital Payment Infinity - The Future of Seamless Transactions"	August 01, 2024	JCC Senayan	Sharing Session	Bank Indonesia
11	BI and Coordinating Ministry for Economic Affairs Invitation for FEKDI Event "Collaboration of SP Stakeholders in Supporting Sustainable Innovation"	August 02, 2024	JCC Senayan	Sharing Session	Bank Indonesia
12	BI and Coordinating Ministry for Economic Affairs Invitation for FEKDI Event "Synergy to Strengthen Digital Economy and Finance and Inclusive for Sustainable Growth" The Digital Leap: Paving the Way for Economic & Finance Transformation"	August 03, 2024	JCC Senayan	Sharing Session	Bank Indonesia
13	Compliance Forum "Realizing Anti-Corruption Culture Through Instilling Integrity Values"	August 14, 2024	Grha BNI	Forum	PT Bank Negara Indonesia (Persero) Tbk
14	OJK Invitation: Consignment Activities for Implementation and Governance of Artificial Intelligence in the Framework of Increasing Digital Resilience in the Banking Sector	August 20, 2024	Four Season	Sharing Session	Financial Services Authority (OJK)
15	Invitation to Sharing Session "Global Banking Trends 2024"	September 10, 2024	Grha BNI	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
16	Executive Education (Leading and Sustaining a Culture of Innovation)	September 14-19, 2024	Kellog School of Management	Training	PT Bank Negara Indonesia (Persero) Tbk
17	IBI #yukdonordarah	October 04, 2024	Menara Pejompongan	Forum	IBank Indonesia

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
18	Penelist BNI Investor Daily Summit 2024: A New Driving Force for Indonesia's Economic Growth	October 08, 2024	JCC Senayan	Forum	PT Bank Negara Indonesia (Persero) Tbk
19	Project Management Company Guidelines Workshop	October 18, 2024	Online - Zoom	Workshop	PT Bank Negara Indonesia (Persero) Tbk
20	Observation Stages of BNI's Corporate Governance Perception Index (CGPI) Program for Fiscal Year 2023 "Strengthening Governance for Maturity & Sustainable Growth"	October 22, 2024	Grha BNI	Workshop	PT Bank Negara Indonesia (Persero) Tbk
21	Level 7 BoD Alignment Seminar	October 23, 2024	Sheraton Grand Jakarta	Seminar	IRPA
22	Indonesia Fintech Summit & Expo (IFSE) 2024: Embed to Expand: The Future of Bank and Fintech	November 12, 2024	The Kasablanka Hall	Forum	Indonesian Fintech Association
	Agung Prabowo - Wholesale and International Banking Director				
1	Risk Management Certification Qualification Level 6	1 April 1, 2024	GRHA BNI	Seminar	Risk Management Certification Body (BSMR)
2	Treasury Certification Level 7	July 20, 2024	Hotel Pullman, Jakarta	Seminar	Risk Management Certification Body (BSMR)
3	Earnings Call and Press Conference 2Q-2024	August 22, 2024	BNI Mataram, Jakarta	Forum	PT Bank Negara Indonesia (Persero) Tbk
4	Strategic Approaches to Combat Financial Crime in Indonesia	September 26, 2024	Wisma 46, Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
5	Singapore Media (CNBC & The Edge)	October 03, 2024	Singapore	Media Interview	CNBC Indonesia Singapore & The Edge Singapore
6	Investor Daily Summit	October 08, 2024	JCC Senayan, Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
7	Risk Management Certification Alignment	November 14-15, 2024	Menara Mandiri, Jakarta	Workshop	PT Bank Mandiri (Persero) TBk
8	WHI Sector All GM & DH Workshop	November 22-23, 2024	Pullman, Puncak	Workshop	PT Bank Negara Indonesia (Persero) Tbk
	Munadi Herlambang* - Institutional Banking Director				
1	Banking Risk Management Certification Qualification 7	23-Mar-24	Jakarta	Risk	Risk Management Certification Agency (BSMR)
2	Focus Group Discussion Directorate General of Taxes	21-Jun-24	Bali	FGD	Directorate General of Taxes
3	Pembicara - Future of Work Summit	27-Jun-24	Jakarta	Konferensi	Apiary Academy
4	The Grand Leader Summit - Transitioning from Academic Excellence to Business Leadership	July 05, 2024	Surabaya	Talk Show	Perguruan Tinggi Institut Teknologi Sepuluh November
5	Credit Risk & Mitigation Workshop BNI - Coordinating Ministry for Maritime Affairs and Investment	July 23, 2024	Jakarta	Workshop	Coordinating Ministry for Maritime Affairs and Investment
6	Speaker - Digital Transformation Indonesia Conference and Expo "Unlocking Financial Inclusion: The Role of Technology in Banking	August 01, 2024	Jakarta	Conference	Digital Transformation Indonesia
7	Speaker - 7th Global Conference: ESG Management & Sustainability	August 06, 2024	Surabaya	Conference	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/Seminar	Date	Venue	Type of Training	Organizer
8	Earning Call & Press Conference 2Q 2024	August 22, 2024	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
9	Central Banking Festival "Embracing Innovation for The Future of Central Banking Services"	August 28, 2024	Jakarta	Seminar	Bank Indonesia
10	Panelist - Indonesia Africa Forum II: Exploring the Impact and Opportunities of Digital Innovation in Indonesia and Africa	September 02, 2024	Bali	Panelist	Ministry of Foreign Affairs
11	BNI Board Retreat Semester II 2024	September 5-7, 2024	Sydney	Workshop	PT Bank Negara Indonesia (Persero) Tbk
12	Fordigi IT Executive Development Program "Digital Transformation Journey and Digital Talent Development."	September 18-20, 2024	Melbourne	Workshop	Digital Forum of the Ministry of State-Owned Enterprises (BUMN)
13	Fordigi Summit 2024	September 25,24	Jakarta	Conference	Digital Forum of the Ministry of State-Owned Enterprises (BUMN)
14	Speaker - BOD Teaching: Leadership in Modern Era "Development and Best Practice"	October 1, 2024	Jakarta	Seminar	BNI University
15	Executive Education "Emerging Leader Development Program"	October 7-11, 2024	New York	Executive Education	ColumBank Indonesiaa Business School, ColumBank Indonesiaa University
16	Earning Call & Press Conference 3Q 2024	October 25, 2024	Jakarta	Workshop	PT Bank Negara Indnesia
17	International Humanitarian Islamic Conference	November 05, 2024	Jakarta	Konferensi	Pengurus Besar Nahdlatul Ulama
18	OJK Panelists Teach - Financially Intelligent Generation Towards Golden Indonesia	November 21, 2024	Makassar	Seminar	Asosiasi Asuransi Umum Indonesia
19	Public Lecture Speaker - Building a Sustainable Financial Future for Students	November 26, 2024	Medan	Seminar	Universitas Sumatera Utara

* Has not been effective

ORIENTATION AND INDUCTION PROGRAM FOR NEW MEMBER OF THE BOARD OF DIRECTORS [ACGS D.5.1]

The Bank has an orientation or induction policy and program for newly appointed members of the Board of Directors with the aim of providing an overview of business activities, the Bank's future plans, work guidelines, and other matters that are the responsibility of the Board of Directors. Policies regarding the orientation and induction programs of new members of the Board of Directors are regulated in the Board of Directors Charter Document. The implementation of this program is intended so that all new members of the Board of Directors can better understand their duties and responsibilities in supporting the Bank's progress and are able to work in harmony with other Bank Governance organs.

In 2024, the Company has facilitated an orientation and induction program for newly appointed directors and transferred directors, namely Putrama Wahju Setyawan, Hussein Paolo Kartadjoemena, I Made Sukajaya, Agung Prabowo, and Munadi Herlambang. The orientation program materials are prepared by the Corporate Secretary, including through:

1) Discussion of the Annual Report, Company Work Plan and Budget (RKAP) and Company Long Term Plan (RJPP), Code of Ethics, Board of Directors' Work Code of Conduct, Good Corporate Governance Policy, and the Company's Articles of Association;

2) Explanation relating to delegated authority, internal and external audits, internal control systems and policies, as well as the duties and roles of the Audit Committee and other committees under the Board of Directors and the Board of Commissioners; and
3) Explanation of the duties, authority, and responsibilities of the Board of Commissioners andthe Board of Directors. This explanation is given by making a presentation by the relevant Unit to the members of the Board of Directors in question as well as making a visit to the BNI Regional/Branch Office.

RISK MANAGEMENT CERTIFICATION

In order to fulfill HR competency in the field of Bank risk management, BNI carries out Risk Management Certification and/or Refreshment programs for the Board of Directors in accordance with POJK No. 24 of 2022 concerning the Development of the Quality of Human Resources for Commercial Banks and OJK Circular No. 28/SEOJK.03/2022 concerning Risk Management Certification for Commercial Bank Human Resources. As of December 31, 2024, all serving members of the BNI Board of Directors have Level 5 Risk Management Certification as one of the requirements for taking the fit and proper test conducted by the Financial Services Authority. Further information regarding this matter has been disclosed in the Company Profile Chapter of this Annual Report.

BOARD OF DIRECTORS' DUTIES IMPLEMENTATION REPORT IN 2024

In 2024, the BNI Board of Directors has carried out its responsibilities in managing the Bank with a strategic approach in accordance with applicable laws and regulations and in accordance with the provisions contained in the Bank's Articles of Association, which can be detailed as follows:
1. Preparation of Bank planning including Corporate Plan and RBB/RKAP;
2. Fulfillment of Bank performance targets;
3. Asset and financial management;
4. Organizing Board of Directors Meetings;
5. Attend Board of Commissioners Meetings;
6. Organizing General Meeting of Shareholders;
7. Monitoring and improving internal business processes; and
8. Carrying out other tasks related to Bank management.

LIST OF BOARD OF DIRECTORS' DECISIONS IN 2024

In 2024, the BNI Board of Directors has issued several decisions regarding the management and strategic management of the Bank's business activities, namely as follows:

No.	Subject
1	Crisis Management Team (CMT) Head Office
2	Authority to Decide on Credit
3	Retirement Preparation Period (MPP)
4	Transfer/Change of Position
5	Organization of Crisis Management Team (CMT) Head Office
6	BNI 78th Anniversary Committee
7	Implementation Committee for Revaluation of Fixed Assets (Land and Buildings) Owned by Bank BNI and Subsidiaries in 2024
8	Committee for Procurement of Health Insurance Program and Health Administration Program for Directors, Commissioners, Active Employees and Families of PT Bank Negara Indonesia (Persero) Tbk for the Period of 2025-2026
9	Resignation Report
10	Cancellation of Decree
11	Cancellation of Temporary Replacement Decree
12	Establishment of Sydney Representative Office Organization
13	Establishment of BNI Sustainability Report Compilation Team for Fiscal Year 2023
14	Establishment of Task Force Team
15	Establishment of Task Force Team
16	Establishment of Task Force Team
17	Establishment of Task Force Team

No.	Subject
18	Granting Authority to Decide on Credit
19	Structure of Business Committee (KBI)
20	Structure of Human Capital Committee (KHC)
21	Structure of Credit Policy Committee (KRB)
22	Structure of Integrated Risk Management Committee (KMRT)
23	Organizational Arrangement of Application Development Division (ADV)
24	Organizational Arrangement of Commercial Banking Division 2 (CMB2)
25	Organizational Arrangement of Compliance Division (CMP)
26	Organizational Arrangement of IT Application Services Division (APS)
27	Organizational Arrangement of IT Infrastructure Management Division (IFM)
28	Organizational Arrangement of IT Strategy & Architecture Division (STA)
29	Organizational Arrangement of Procurement & Fixed Assets Division (PFA)
30	Organizational Arrangement of Retail Credit Risk Division (RTC)
31	Organizational Arrangement of Retail Digital Delivery Division (RDL)
32	Organizational Arrangement of Wholesale Digital Channel Division (WDC)
33	Organizational Arrangement of Wholesale Digital Delivery Division (WDL)
34	Organizational Arrangement of Wholesale Transaction Product & Partnership Division (WPP)
35	Determination of BUMN Human Capital Data Management PIC
36	Determination of BUMN Human Capital Information System (HCIS) Portal PIC
37	Determination of Senior Vice Executive President Position
38	Termination of Employment Relationship
39	Termination of Assignment as Supervisory Board of Bank Negara Indonesia Pension Fund
40	Termination of Project Manager Appointment/Assignment
41	Termination of Co-Project Manager and Project Manager Appointment
42	Reappointment as Bank Negara Indonesia Pension Fund Manager
43	Appointment as Permanent Employee
44	Appointment as Member of Bank Negara Indonesia Pension Fund Supervisory Board
45	Temporary Replacement
46	Term of Service Award
47	Appointment of PJ/Grade Adjustment
48	Assignment as Bank Negara Indonesia Pension Fund Manager
49	Appointment/Assignment of Project Manager
50	Appointment/Assignment of Project Manager
51	Appointment/Assignment of Project Manager
52	Appointment/Assignment of Project Manager
53	Appointment/Assignment of Board of Supervisors of DPLK PT Bank Negara Indonesia (Persero) Tbk
54	Appointment/Assignment of Co-Project Manager
55	Appointment/Assignment of Member of Financial Institution Pension Fund Management
56	Appointment/Assignment of Co-Project Manager
57	Appointment/Assignment of Co-Project Manager
58	Appointment/Assignment of Co-Project Manager
59	Appointment/Assignment of the Chairman of the Financial Institution Pension Fund Management
60	Appointment/Assignment of Project Manager
61	Appointment/Assignment of Project Manager and Co-Project Manager
62	Appointment/Assignment of Project Manager
63	Appointment Assignment
64	Appointment/Assignment of Project Manager
65	Indefinite Term Employment Agreement
66	Written Statement of the Founder
67	Extension of the Sharia Board of the Financial Institution Pension Fund of PT Bank Negara Indonesia (Persero) Tbk

No.	Subject
68	Extension of the Term of Service
69	Charter of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk
70	Procedure for Implementing Directors' Leave
71	Concurrent Positions
72	Decree on Investment Directions of the BNI Pension Fund
73	Decree of the Internal Risk Maturity Index (RMI) Assessment Team of BNI
74	Decree of the Team for Drafting Amendments to the Articles of Association of PT Bank Negara Indonesia (Persero) Tbk. for the Year 2023/2024
75	Decree of the Board of Directors
76	Board of Directors Decree on BNI Pension Fund Investment Direction
77	Decree on Dispensation Permit
78	CMC Productivity Enhancement Implementation Team
79	Enterprise Financial System (EFS) Implementation Team
80	Productivity Enhancement Region Implementation Team
81	Sanur Special Economic Zone (KEK) Initiative Team
82	RM Tool (Connect) Improvement Initiative Team
83	Wholesale Loan Management System (LMS) Team
84	Human Capital Roadmap & Quick Wins Implementation Team
85	BNI Grading Review Task Force Team
86	Taskforce Implementation Team
87	Tim Wholesale Transaction Banking Transformation (AVATAR)
88	Usulan Pegawai Magang Talent Secondment KBUMN Periode July s.d December 2024

BOARD OF DIRECTORS' ASSESSMENT OF THE PERFORMANCE OF COMMITTEES UNDER THE BOARD OF DIRECTORS [ACGS D.5.7]

In order to support the effective implementation of the duties and responsibilities of the Board of Directors, the BNI Board of Directors has supporting organs in the form of committees whose existence has been adapted to BNI's business requirements and also as a form of compliance with applicable banking regulations. The following are the committees under the Board of Directors:

1. Credit Committee;
2. Credit Policy Committee (KRB);
3. Business Committee (KBI);
4. Asset & Liability Committee (ALCO);
5. Human Capital Committee (KHC);
6. Performance Management Committee (PMC);
7. Risk Management & Anti-Fraud Committee (KRA);
8. Technology Management Committee (KMT);
9. Integrated Risk Management Committee (KMRT); and
10. Subsidiary Company Committee (KPA).

The existence of the ten supporting committees under the Board of Directors aims to increase effectiveness and efficiency in carrying out Bank operations.

Assessment Procedures Used [ACGS D.5.7]

In 2024, the Board of Directors periodically evaluated the performance of the supporting committees under it in accordance with the assessment criteria for the performance of Committees under the Board of Directors. The assessment procedure is carried out by:

a. The assessment is carried out by each permanent member of the Board of Directors and SEVP who are members of the Committee based on the assessment proposal from the Division as secretary of the Committee. The assessment used is the combined value and average value of all assessors.
b. The assessment consists of quantitative and qualitative elements.
c. The final score can be discussed and discussed in a Committee Meeting or Board of Directors Meeting as a form of evaluation and input as well as future direction.
d. The final score will be documented by the Division as Committee secretary and copied to the Corporate Secretary.

Grading Criteria Used [ACGS D.5.7]

In assessing the performance of committees under the Board of Directors, BNI has a number of criteria that serve as the basis for the assessment, including at least:

a. The frequency of meetings is compared with the work plan/minimum obligations.

b. Speed of preparation and delivery of minutes of Committee meetings.
c. Percentage of follow-up and speed of follow-up time to Committee meeting decisions.
d. The percentage of member attendance (quorum) and active participation of members in meetings.
e. Banking performance ratios (key ratios) related to the Committee's functions.
f. Agenda and scheduling of strategic issues facing the company (sense of urgency).

In addition to referring to the general criteria above, BNI also has special assessment criteria to assess the performance of each committee, which is tailored to the functions, duties, and responsibilities of each committee.

2024 Committee Performance Assessment Results [ACGS D.5.7]

No.	Supporting Committees under the Board of Directors	Score
1.	Credit Committee	Good
2.	Credit Policy Committee (KRB)	Good
3.	Business Committee (KBI)	Good
4.	Asset & Liability (ALCO) Committee	Good
5.	Human Capital Committee (KHC)	Good
6.	Risk Management Committee (PMC)	Good
7.	Risk Management & Anti Fraud Committee (KRA)	Good
8.	Management Technology Committee (KMT)	Good
9.	Integrated Risk Management Committee (KMRT)	Good
10	Subsidiary Committee (KPA)	Good

Score Range Table

Value Range	Description
80-100	Excellent
60-79	Good
<60	Adequate

Meanwhile, specifically regarding the performance assessment of the Internal Audit Work Unit and Risk Management Work Unit, it has been explained in the Internal Audit and Risk Management Work Unit section in a separate sub-chapter of this Annual Report.

Party Conducting the Performance Assessment of the Board of Directors Committee [ACGS D.5.7]

The parties who assess the performance of the committees under the Board of Directors are as follows:

No.	Performance Assessment	Assessment conducted by
1.	Committee on a collegial basis	Each member of the Committee for the performance of the Committee
2.	Committee Members on an individual basis	Each Committee member provides an assessment for each other Committee member.
3.	Chairman of the Committee	Each Committee member is related to the performance of their Chairman of the Committee

All answers given by the parties mentioned above were submitted directly through an online survey. The results of the performance assessment are confidential and anonymous and are submitted to the Nomination and Remuneration Committee. Furthermore, the Nomination and Remuneration Committee submits and discusses all the results of the Committee's performance assessment at the Board of Commissioners level at the Board of Commissioners meeting. The results of the discussion will be followed up in the form of improvements or action plans (if necessary).

Performance Assessment of the Board of Directors and the Board of Commissioners [ACGS D.5.5, D.5.6]

PERFORMANCE ASSESSMENT OF THE BOARD OF DIRECTORS (INCLUDING THE PRESIDENT DIRECTOR)

Procedure for Performance Assessment of the Board of Directors (Including the President Director)

As a state-owned enterprise (soe) bank, the procedures and mechanisms for the performance assessment of BNI's Board of Directors refer to the provisions of the Minister of SOEs Regulation No. PER-3/MBU/03/2023 dated March 20, 2023, concerning SOE Governance and Human Resources, Minister of SOEs Regulation No. PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Governance and Significant Corporate Activities of SOEs, and the Ministry of SOEs Letter No. S-491/MBU/04/2023 dated September 29, 2023.

The policies for assessing the performance of the Board of Directors at BNI include:

1) Collegial performance assessment of the Board of Directors is conducted at least twice a year.
2) Individual performance assessment of the Board of Directors, including the President Director, is conducted at least twice a year; and [ACGS D.5.4]
3) Annually, the collegial and individual performance achievements of the Board of Directors are reviewed by a public accounting firm auditing the company's financial statements.

Performance assessments of the Board of Directors, both collegial and individual, are conducted through a self-assessment mechanism, which is then reviewed by a public accounting firm. The results of the performance assessment are confidential and anonymous, serving as input for the continuous improvement of the Board of Directors' performance.

For individual performance assessments of the Board of Directors (including the President Director), a Balanced Scorecard approach is used, covering Financial, Customer, Internal Business Process, and Learning & Growth perspectives. These are aligned with BNI's strategy, the duties, and responsibilities of each Board member, while considering both collegial and individual responsibilities, in financial and non-financial terms.

Performance Assessment Criteria For The Board of Directors (Including The President Director)

Management of the Key Performance Indicators (KPI) for the Board of Directors, both collegial and individual, refers to applicable government regulations, strategic initiatives/Management Work Plans (RKM) for the directorate, and the Bank's Business Plan (RBB)/Corporate Work and Budget Plan (RKAP) for the fiscal year. The performance assessment criteria for the Board of Directors (including the President Director) are as follows:

1. Collegial KPI [ACGS D.5.5]
   The Bank uses 5 (five) main perspectives to measure and assess collegial KPI performance:
   a. Economic and social value for Indonesia, covering financial and social aspects.
   b. Business Model Innovation.
   c. Technology Governance Framework Leadership.
   d. Investment Enhancement.
   e. Talent Development

   These perspectives are further broken down into financial and non-financial performance targets aligned with the Bank's strategic initiatives.

2. Individual KPI [ACGS D.5.6]
   Individual KPIs for the Board of Directors are designed based on the duties, core functions, and responsibilities of each member. The criteria used by BNI to measure the performance of Individual Directors (including the President Director) uses the Balance Scorecard which consists of 4 (four) perspectives as follows:
   a. Financial.
   b. Customer.
   c. Internal Business Process.
   d. Learning & Growth

Parties Conducting The Assessment

The performance of the Board of Directors, including the President Director of the Bank, is evaluated periodically based on predetermined assessment parameters outlined in the Board of Directors' KPI, both collegially and individually. The achievement of these KPIs, whether at the collegial or individual level, is reviewed by a Public Accounting Firm (KAP) that audits the company's financial statements. The results are then submitted to the Board of

Commissioners through the Nomination and Remuneration Committee, as well as to the Ministry of State-Owned Enterprises (BUMN) as the Bank's controlling shareholder.

Results of The Board of Directors' Performance Assessment (Including The President Director) In 2024

In 2024, BNI conducted an independent assessment of the Board of Directors' performance by measuring both the collegial KPI of the Board of Directors and the individual KPI of each Director, including the President Director. The assessment results are as follows:

1. Collegial KPI Achievement [ACGS D.5.5]

Perspective	No	KPI	Weight	Unit	Achievement in 2024
Economic and social value for Indonesia (65%)	1	PPOP Consolidation	8%	IDR Trillion	**98.5%**
	2	Total Shareholder Return (TSR)	6%	Percentile (P)	**110.0%**
	3	ROE Tier 1 Konsolidasi	7%	%	**108.4%**
	4	CAR	6%	%	**105.4%**
	5	Average Growth of Total Deposit	5%	%	**95.0%**
	6	Average Growth of Total Loan	5%	%	**95.5%**
	7	Loan at Risk (LaR)	6%	%	**110.0%**
	8	Cost of Credit (CoC)	7%	%	**106.9%**
	9	BOPO Consolidation	5%	%	**100.7%**
	10	KUR Distribution Realization	5%	%	**104.5%**
	11	NPS for Bank	5%	%	**110.0%**
Business Model Innovation (8%)	12	CASA Ratio	4%	%	**96.5%**
	13	Number of Active Users of BNI Mobile Banking and wondr	4%	Amount (Thousand)	**110.0%**
Technology Leadership (7%)	14	ATM Integration Implementation (Project Jalin)	3%	Unit ATM	**104.2%**
	15	Cyber Security Breach (Zero incident)	4%	Report	**110.0%**
Increased Investment (12%)	16	Environment, Social, Government (ESG) Rating	3%	Rating	**100.0%**
	17	Number of Diaspora Customer Accounts (Diaspora Saving)	5%	Amount	**110.0%**
	18	Sustainable Financing/Credit	4%	IDR Trillion	**101.9%**
Talent Development (8%)	19	Average diversity in nominated talent (women and young)	4%	%	**109.7%**
	20	Employee Productivity	4%	Million/person/ month	**100.7%**
Total Achievements					**104.5%**

2. Achievement Of Individual KPIS [ACGS D.5.6]

The assessment of individual KPIs is based on the achievement of each Directorate's KPI targets, detailed as follows:

President Director [ACGS E.5.4]

- Achieving the realization of the Business Plan in accordance with RKAP/RBB.
- Fulfilling internal control implementation at each line of defense.
- Ensuring compliance with regulations as a public company.
- Maintaining the bank's soundness level.
- Executing corporate actions as planned.
- Achieving the implementation and distribution of TJSL.
- Enhancing BNI's brand image.
- Improving asset quality.

Vice President Director

- Achieving the realization of the Business Plan in accordance with RKAP/RBB.
- Fulfilling internal control implementation at each line of defense.
- Improving BNI's brand image.
- Achieving the increase in Regional business and Pension Fund & Financial Institutions business.
- Improving asset quality.

Wholesale & International Banking Director
- Increasing profitability and business volume for the Corporate Banking, International, and Treasury segments.
- Increased transaction volume by customers in the Corporate Banking, International and Treasury segments.
- Achieved Transformation and Overseas Office Business.
- Maintaining the Company's liquidity.
- Maintain asset quality in Corporate Banking and International segments.

Enterprise & Commercial Banking Director
- Increasing profitability and business volume for the Enterprise & Commercial Banking segments.
- Increasing funding for Enterprise & Commercial Banking.
- Increasing transaction volume by Enterprise & Commercial Banking customers.
- Maintaining asset quality in the Enterprise & Commercial Banking segment.

Retail Banking Director
- Increasing business volume in the Retail Banking segment.
- Enhancing funding in the Retail Banking segment.
- Increasing transaction volume by Retail Banking customers.
- Achievement of Xpora business.
- Maintaining the quality of Retail Banking segment assets.

Institutional Banking Director*
- Increasing profitability and business volume in the Institutional Banking segment.
- Increasing funding for Institutional Banking.
- Increasing transaction volume by customers in the Institutional Banking and International segments.
- Supporting government programs.
- Increasing Wallet Share.

Digital & Integrated Transaction Banking Director
- Increasing fee-based income from digital transactions.
- Increasing volume and digital transactions for the Wholesale & Retail Banking segment.
- Increasing number of active transaction users and Feature Holding Ratio for the Wholesale & Retail Banking segment.
- Achieving BNI Corporate Branding Improvement.

Network & Services Director
- Growing business volume in regions focusing on the Retail Banking and non-debtor Commercial segments.
- Increasing transaction volume by Retail Banking segment customers.
- Increasing Agen46 performance.
- Achieving customer satisfaction and complaint resolution.
- Maintaining the quality of Regional assets.

Risk Management Director
- Ensuring effective implementation of risk management in accordance with the articles of association, risk management policies, internal control system policies, standard procedures, and external regulations.
- Fulfilling internal control implementation in each line of defense.
- Attaining of End to End Debtor Monitoring.
- Maintaining asset quality improvement.

Finance Director
- Achieving the realization of the Company's Business Plan in accordance with RKAP/RBB.
- Attaining the business performance of subsidiaries.
- Increasing the Data Quality Index.
- Enhancing procurement process effectiveness.

Technology & Operations Director
- Effectively governing technology and information.
- Completing Information Technology projects.
- Enhancing operational excellence.

Human Capital & Compliance Director
- Achieving human capital management strategies and targets.
- Improving employee capabilities and productivity.
- Implementing Compliance at BNI Bank.
- Reducing the number of regulatory sanction penalties.
- Fulfilling business procedure and policy needs.

*) The duties of the Director of Institutional Banking here refers to those performed by the Acting Director mechanism applicable at BNI.

BOARD OF COMMISSIONERS PERFORMANCE ASSESSMENT

The performance assessment of the Board of Commissioners is conducted collegially and reported to the Shareholders during the Annual General Meeting of Shareholders (AGMS) through the presentation of the Board of Commissioners' performance, as outlined in the Board of Commissioners' Supervisory Report. Based on this report, the AGMS subsequently grants full discharge and release of responsibility (*volledig acquit et de charge*) to the Board of Commissioners for the supervisory actions carried out during the financial year ending at the close of the year.

As part of the implementation of Good Corporate Governance in alignment with the Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Corporate Governance and Significant Corporate Activities of State-Owned Enterprises, the Board of Commissioners prepares its annual work plan at the beginning of the year. This work plan is an integral part of the Company's Work Plan and Budget (RKAP). To evaluate the implementation of this work plan, the Board of Commissioners subsequently conducts a collegial performance assessment. This assessment aims to ensure that the Board of Commissioners has effectively performed its duties throughout the financial year using a self-assessment method.

Policy and Procedure for the Board of Commissioners' Performance Assessment

The performance assessment of the Board of Commissioners is conducted twice a year (per semester) through a self-assessment process carried out internally by the Bank. The results of this assessment are reported to the Shareholders during the Annual General Meeting of Shareholders (AGMS). The performance evaluation serves as input for improving the Board of Commissioners' effectiveness in the future. The assessment policy and procedure focus on evaluating the collegial performance of the Board of Commissioners.

Board of Commissioners' Performance Assessment Criteria [ACGS D.5.5]

The collegial performance assessment is conducted by measuring the achievement of the Board of Commissioners' Annual Key Performance Indicators (KPI), which are formulated and established at the beginning of the year. The 2024 Board of Commissioners' performance assessment, prepared and set at the start of the year, is based on the following aspects:

1. Planning Aspect – Weight: 10%
2. Supervision and Advisory Aspect – Weight: 55%
3. Reporting Aspect – Weight: 17%
4. Dynamic Aspect – Weight: 18%

Parties Conducting the Board of Commissioners' Performance Assessment

The collegial performance assessment of the Board of Commissioners is conducted through a self-assessment process, proposed by the Nomination and Remuneration Committee and approved by the Board of Commissioners.

Board of Commissioners' Performance Assessment Results In 2024 [ACGS D.5.5]

The performance of the Board of Commissioners is reflected in the results of the self-assessment conducted against the 2024 Board of Commissioners' Key Performance Indicators (KPI). The assessment indicates that the Board of Commissioners has effectively carried out its supervisory duties through work programs outlined in the 2024 Board of Commissioners' Work Plan, in alignment with the established targets. The achievement of the 2024 Board of Commissioners' KPI as a measure of their performance is presented as follows:

No.	Aspect and Parameter	Weight	Achievement
I.	Planning Aspect Conducting discussions and providing recommendations/approval on the preparation of the Board of Commissioners' work plan for the coming year	10.00%	10.00%
II.	Supervision and Advice Aspect a. Providing approval/response/recommendation to Shareholders on the Bank's Business Plan for the coming year and the Revision of the Bank's Business Plan for the current year, Annual Report, and Quarterly Performance Analysis. b. Providing approval and advice to the Board of Directors according to the Board of Commissioners' field of duty. c. Board of Commissioners Meeting d. Board of Commissioners Committee Meeting with the Board of Directors/Related Units e. Board of Commissioners Working Visit f. Realization of the Board of Commissioners Committee Work Plan	55.00%	56.42%
III.	Reporting Aspect a. Board of Commissioners KPI Realization Report b. Board of Commissioners Supervision Report to the Authorities and the Ministry of State-Owned Enterprises.	17.00%	17.00%
IV.	Dynamic Aspect a. Proposal of External Auditors to Shareholders b. Competency Improvement through Seminars, Workshops, etc. c. GCG Assessment Results	18.00%	18.80%
Total		**100.00%**	**102.22%**

Procedure for the Board of Commissioners' Performance Assessment

BNI conducts a periodic performance assessment of the Board of Commissioners, which includes the implementation of the Good Corporate Governance (GCG) self-assessment. This assessment is carried out every semester, with evaluations conducted in June and December of the respective year.

Nomination and Remuneration

PROCEDURE FOR NOMINATION OF MEMBERS OF THE BOARD OF COMMISSIONERS

Nomination Policy for Members of the Board of Commissioners

The Nomination Policy for members of the Board of Commissioners is regulated in the Good Corporate Governance Policy, Company Guidelines No. IN/097/CMP/001 dated August 28, 2024, which has been updated and approved by the Board of Commissioners through BNI Board of Commissioners Letter No. DK/237 dated December 31, 2024, which regulates, among other things, the system and procedures for selecting and/or replacing members of the Board of Commissioners to be submitted to the GMS.

NOMINATION PROCESS FOR BOARD OF COMMISSIONERS MEMBERS

Criteria for Members of the Board of Commissioners

1. Have good character, morals, and integrity and are capable of carrying out legal actions.
2. Within the last 5 (five) years before appointment and during his/her tenure:
   1) Never declared bankruptcy.
   2) Never been a member of the Board of Directors and/or a member of the Board of Commissioners who was found guilty of causing a company to be declared bankrupt.
   3) Never been convicted of committing a criminal act that is detrimental to state finances and/or related to the financial sector.
   4) Never been a member of the Board of Directors and/or member of the Board of Commissioners during his/her tenure::
      a) Never held an annual GMS;
      b) His/her accountability as a member of the Board of Directors and/or Board of Commissioners has never been accepted by the GMS or has never provided his/her accountability as a member of the Board of Directors and/or member of the Board of Commissioners to the GMS; and
      c) Has ever caused a company that obtained a permit, approval, or registration from the OJK to not fulfill its obligation to submit an annual report and/or financial statement to the OJK, and/or the annual report and/or financial statement was not approved and/or ratified by the GMS.
3. Have a commitment to comply with statutory regulations.
4. Have knowledge and/or expertise in the field required by the Company.
5. Not currently holding a position that has the potential to cause a conflict of interest.
6. Not serving as a member of the Board of Commissioners/Supervisory Board of a SOE or Board of Commissioners of the Subsidiary Company concerned for 2 (two) periods;
7. Not currently holding a position that is prohibited from holding a position as a member of the Board of Commissioners;
8. Physically and mentally healthy, who is not suffering from an illness that could hinder the performance of his/her duties as a member of the Board of Commissioners, as proven by a health certificate from the hospital;
9. Have a Taxpayer Identification Number (NPWP) and have carried out the obligation to pay taxes for the last 2 (two) years;
10. For prospective candidates from technical ministries or other government agencies, they must be based on a letter of proposal from the head of the agency concerned; and
11. Prospective candidates for members of the Board of Commissioners who come from State Administrators must report the State Administrator's Wealth Report (LHKPN) for the last 2 (two) years as proven by proof of the LHKPN report to the authorized institution.
12. Appointment of members of the Board of Commissioners who come from employees or officials in institutions that carry out regulatory and/or supervisory functions of Banks and/or other financial service institutions is carried out after the person concerned has effectively ceased to be an employee or official and has undergone a cooling-off period of at least 6 (six months).
13. Former members of the Board of Directors or Executive Officers or parties who have a relationship with the Bank who may influence the person's ability to act independently must undergo a cooling-off period of at least 1 (one) year before becoming an Independent Commissioner at the Bank concerned.

PROCEDURES FOR ELECTION, APPOINTMENT, REPLACEMENT, AND DISMISSAL OF MEMBERS OF THE BOARD OF COMMISSIONERS

1. The selection of candidates for members of the Board of Commissioners is carried out using procedures and mechanisms in accordance with those regulated in SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, which, among other things, regulates provisions for sources, selection and assessment of prospective candidates, as well as proposals for appointment.
2. Banks can use the services of independent and reputable third parties in the selection process for candidates for the Board of Commissioners. In carrying out the nomination process for the BNI Board of Commissioners in 2024, the Nomination and Remuneration Committee did not collaborate with independent professionals.
3. Every proposal for replacement and/or appointment of members of the Board of Commissioners to the GMS must consider the recommendations of the committee that carries out the nomination function.
4. Replacement and/or appointment of members of the Board of Commissioners prioritizes professional composition, independence, and suitability of competence and pays attention to diversity in terms of education (field of study), work experience, age, and expertise, without distinction of ethnicity, religion, and race, which is required in carrying out the duties and responsibilities of the Board of Commissioners. Further explanation regarding the diversity policy of the Board of Commissioners is outlined in this Annual Report on page 788.
5. Members of the Board of Commissioners are appointed and dismissed by a GMS, which must be attended by Series A Dwiwarna Shareholders, and the resolutions of the GMS must be approved by Series A Dwiwarna Shareholders, taking into account the provisions in the Articles of Association.
6. Procedures for appointing members of the Board of Commissioners refer to OJK regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies as well as regulations of the Minister of SOE concerning SOE Organs and Human Resources. Procedures for appointing members of the Board of Commissioners include:
7. Sources of prospective members of the Board of Commissioners come from:
   a. Former SOE Board of Director;
   b. Board of Commissioners/Supervisory Board of SOE;
   c. Structural Officials and Functional Government Officials; or
   d. Other sources.
8. The GMS/Minister can determine candidates proposed by the Nomination and Remuneration Committee at the Ministry of SOE to become members of the Board of Commissioners.
9. Determination of a person as a member of the Board of Commissioners can be done after being declared to have passed the Fit and Proper Test (UKK) in accordance with sectoral provisions.
10. In the event that the appointment of members of the Board of Commissioners is carried out before the UKK is in accordance with sectoral provisions, the actions, duties, and functions as a member of the Board of Commissioners are calculated from the time they are declared to have passed the UKK in accordance with sectoral provisions.
11. Members of the Board of Commissioners, as referred to in point 9, have terms of office that are effective as of the date determined by the GMS/Minister.
12. Curriculum vitae of prospective members of the Board of Commissioners who will be proposed for appointment at the GMS must be available and announced at the time of the GMS before making a decision regarding appointment as members of the Board of Commissioners.
13. The GMS resolution regarding the appointment and dismissal of members of the Board of Commissioners also determines when the appointment and dismissal will take effect. In the event that the GMS does not determine, then the appointment and dismissal of members of the Board of Commissioners shall take effect from the closing of the GMS.
14. Members of the Board of Commissioners are appointed for a period starting from the date determined by the GMS that appointed them and ending at the close of the 5th (fifth) Annual GMS after the date of appointment, provided that the period cannot exceed 5 (five) years, taking into account the regulations and legislation in the fields of Capital Markets and Banking, but without prejudice to the rights of the GMS to dismiss members of the Board of Commissioners at any time before their term of office ends. After their term of office ends, members of the Board of Commissioners can be reappointed by the GMS for one term of office.
15. A member of the Board of Commissioners has the right to resign from his position by notifying the Company in writing of his intention.
16. The Company is obliged to hold a GMS to decide on requests for resignation of members of the Board of Commissioners within a period of no later than 90 (ninety) days after receipt of the letter of resignation.

17. The Company is obliged to disclose information to the public and submit it to the OJK no later than 2 (two) working days after receiving the request for resignation of a member of the Board of Commissioners.
18. Before the resignation becomes effective, the relevant member of the Board of Commissioners is still obliged to complete his duties and responsibilities in accordance with the articles of association and applicable laws and regulations.
19. The term of office of a member of the Board of Commissioners ends if:
    a. His/her resignation is effective.
    b. Deceased.
    c. His/her term of office ends.
    d. Dismissed due to GMS resolution.
    e. Declared bankrupt by the Commercial Court, which has permanent legal force, or placed under guardianship based on a court decision.
    f. No longer meets the requirements as a member of the Board of Commissioners based on the provisions of the Articles of Association and applicable laws and regulations.
    g. Dismissed due to a GMS resolution at any time if a member of the Board of Commissioners:
        1) Unable to carry out his/her duties properly.
        2) Violates the provisions of the articles of association and/or statutory regulations.
        3) Being involved in actions that are detrimental to the Bank and/or the country.
        4) Carrying out actions that violate the ethics and/or propriety that should be respected as a member of the Board of Commissioners.
        5) Declared guilty by a court decision that has permanent legal force.
        6) Resign.
        7) Other reasons deemed appropriate by the GMS for the interests and objectives of the Company.

PROCEDURE FOR NOMINATION OF MEMBERS OF THE BOARD OF DIRECTORS

Board of Directors' Member Nomination Policy

Criteria for Members of the Board of Directors

1. Have character, morals, expertise, integrity, leadership, experience, honesty, and good behavior and are capable of carrying out legal actions;
2. Domiciled in Indonesia.
3. Within the last 5 (five) years before appointment and during his/her tenure:
    a. Never declared bankruptcy;
    b. Never been a member of the Board of Directors and/or a member of the Board of Commissioners who was found guilty of causing a company to be declared bankrupt;
    c. Never been convicted of committing a criminal offense that is detrimental to state finances and/or related to the financial sector;
    d. Never been a member of the Board of Directors and/or member of the Board of Commissioners who during his/her tenure:
        1) Never held an annual GMS;
        2) His/her accountability as a member of the Board of Directors and/or Board of Commissioners has never been accepted by the GMS or he/she has never provided his/her accountability as a member of the Board of Directors and/or member of the Board of Commissioners to the GMS; and
        3) Has caused a company that has obtained a permit, approval, or registration from the OJK to fail to fulfill its obligation to submit an annual report and/or financial statement to the OJK.
4. Have a commitment to comply with statutory regulations.
5. Have knowledge and/or expertise in the field required by the Company.
6. Not currently holding a position that has the potential to cause a conflict of interest;
7. Not serving as a member of the Board of Directors of the relevant SOE or Subsidiary Company for 2 (two) periods;
8. Not currently holding a position that is prohibited from holding a position as a member of the Board of Directors according to statutory regulations;
9. Have dedication and devote full time to carrying out their duties, as stated in a statement letter from the person concerned;
10. Physically and spiritually healthy, that is, not currently suffering from an illness that could hinder the performance of their duties as a Director, as proven by a health certificate from the hospital; and
11. Have a Taxpayer Identification Number (NPWP) and have carried out the obligation to pay taxes for the last 2 (two) years.
12. Appointment of members of the Board of Directors who come from employees or officials at institutions that carry out regulatory and/or supervisory functions of Banks and/or other financial service institutions is carried out after the person concerned has effectively ceased to be an employee or official and has undergone a cooling-off period of at least 6 (six) month.

PROCEDURES FOR SELECTION, APPOINTMENT, REPLACEMENT, AND DISMISSAL OF THE BOARD OF DIRECTORS

1. The selection of prospective members of the Board of Directors is carried out using

procedures and mechanisms in accordance with those regulated in the Regulation of the Minister of SOE No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, which, among other things, regulates provisions for sources, selection and assessment of prospective candidates, as well as proposals for appointment.

2. Banks can use the services of independent and reputable third parties in the selection process for the Board of Directors candidates.
3. Every proposal for replacement and/or appointment of members of the Board of Directors to the GMS must consider the recommendations of the committee that carries out the nomination function.
4. Replacement and/or appointment of members of the Board of Directors prioritizes professional composition, independence, and suitability of competency and pays attention to diversity in terms of education (field of study), work experience, age, expertise, and representation of women, without distinction of ethnicity, religion, and race, which are needed appropriately in carrying out the duties and responsibilities of the Board of Directors. An explanation of the Board of Directors' Diversity Policy is outlined in this Annual Report on page 788.
5. Members of the Board of Directors are appointed and dismissed by the GMS, where the GMS is attended by Series A Dwiwarna shareholders, and the GMS resolutions must be approved by the Series A Dwiwarna shareholders, taking into account the provisions in the Articles of Association. This provision also applies to GMS held in order to revoke or confirm the decision to temporarily dismiss a member of the Board of Directors.
6. Procedures for appointing members of the Board of Directors refer to OJK regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies as well as regulations of the Minister of SOE concerning SOE Organs and Human Resources.
7. Sources of prospective members of the Board of Directors come from:
   a. Former SOE Board of Director;
   b. Board of Commissioners/Supervisory Board of SOE;
   c. Structural Officials and Functional Government Officials; or
   d. Other sources.
8. The GMS/Minister can appoint candidates proposed by the Nomination and Remuneration Committee at the Ministry of SOE to become members of the Board of Directors.
9. Determination of a person as a member of the Board of Directors can be done after being declared to have passed the Fit and Proper Test (UKK) in accordance with sectoral provisions.
10. In the event that the appointment of members of the Board of Directors is carried out before the UKK is in accordance with sectoral provisions, the actions, duties, and functions as a member of the Board of Directors are calculated from the time they are declared to have passed the UKK in accordance with sectoral provisions.
11. Members of the Board of Directors, as referred to in point 8, have terms of office that are effective as of the date determined by the GMS/Minister.
12. Curriculum vitae of prospective members of the Board of Directors who will be proposed for appointment at the GMS must be available and announced at the time of the GMS before making a decision regarding appointment as a member of the Board of Directors.
13. The GMS resolution regarding the appointment and dismissal of members of the Board of Directors also determines when the appointment and dismissal will take effect. In the event that the GMS does not determine, then the appointment and dismissal of members of the Board of Directors will take effect from the closing of the GMS.
14. Members of the Board of Directors are appointed for a period starting from the closing of the GMS or the date determined by the GMS appointing them and ending at the close of the 5th (fifth) Annual GMS after the date of appointment, provided that the period cannot exceed 5 (five) years, taking into account the laws and regulations in the fields of Capital Markets and Banking, but without prejudice to the rights of the GMS to dismiss members of the Board of Directors at any time before their term of office ends.
15. Such termination takes effect from the closing of the GMS unless otherwise determined by the GMS.
16. After their term of office ends, members of the Board of Directors can be reappointed by the GMS for one term of office.
17. Members of the Board of Directors may resign from their positions before their term of office ends. In the event that a member of the Board of Directors resigns, the relevant member of the Board of Directors is obliged to submit a written resignation request regarding his/her intentions to the Company
18. The Company is obliged to hold a GMS to decide on requests for resignation of members of the Board of Directors no later than 90 (ninety) days after receipt of the resignation letter.
19. Members of the Board of Directors who resign as mentioned above can still be held accountable as members of the Board of Directors from the time

of their appointment until the date of approval of their resignation at the GMS.

20. The term of office of a member of the Board of Directors ends if:
    a. His/her resignation is effective.
    b. Deceased;
    c. His/her term of office ends;
    d. Declared bankrupt by the Commercial Court, which has permanent legal force, or placed under guardianship based on a court decision;
    e. No longer meets the requirements as a member of the Board of Directors based on the provisions of the Articles of Association and statutory regulations;
    f. Dismissed by resolution of the GMS at any time if a member of the Board of Directors:
        1) Unable to fulfill the obligations agreed upon in the management contract;
        2) Unable to carry out their duties properly;
        3) Violates the provisions of the Articles of Association and/or statutory regulations;
        4) Being involved in actions that are detrimental to the Company and/or the country;
        5) Carrying out actions that violate the ethics and/or propriety that should be respected as the Board of Directors;
        6) Resign;
        7) Other reasons deemed appropriate by the GMS for the interests and objectives of the Company.

All candidates for members of the Board of Directors are proposed by the Board of Commissioners with the assistance of the review and selection process by the Nomination and Remuneration Committee. All prospective candidates who will be appointed as candidates for members of the Bank's Board of Directors are guaranteed to be someone who has been declared to have fulfilled the formal requirements, material requirements, and other requirements and passed the Fit and Proper Test as required by banking and SOE regulations. Furthermore, the determination of the appointment of prospective members of the Bank's Board of Directors is carried out in accordance with the physical GMS resolution, the Minister's decision as the GMS, and the decision of all shareholders. [ACGS (B).D.2.2]

Board of Directors' Succession Policy [ACGS D.5.3]

In order to maintain the continuity of the Bank's leadership in the future, BNI has and implements a succession policy for the Board of Directors and/or Senior Management, which has been aligned with Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 dated March 3, 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises and Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 dated March 20, 2023 concerning Organs and Human Resources of State-Owned Enterprises. BNI's succession policy ensures that potential employees who meet certain criteria and are included in the Talent Pool will have the opportunity to take part in training programs or activities related to management, business strategy, strategic planning, business risk and potential analysis, operational and financial performance analysis, and various other similar programs.

During the Board of Directors nomination process, the Board of Commissioners identifies talented employee candidates from within the Bank by considering recommendations from the Nomination and Remuneration Committee, which plays a vital role in ensuring that the nomination and selection process runs transparently and in accordance with rules or ethics. In carrying out the nomination process for the Board of Directors, BNI can use independent external professional services. As an implementation, in 2024, BNI collaborated with independent professionals, namely Daya Dimensi Indonesia, to carry out the process of identifying the quality of the Board of Director candidates who are in line with the Company's strategic direction, with an Independent Consultant Service fee of IDR 32,000,000 per candidate. Independent parties carry out the responsibility to identify potential candidates who meet the desired profile and propose them to shareholders and/or consider candidates proposed by shareholders at the GMS. In the final stage, BNI submits a list of names of selected internal candidates from the Board of Directors succession program participants to the Ministry of SOE to undergo a fit and proper test. [ACGS (B).D.2.2]

REMUNERATION PROCEDURES AND IMPLEMENTATION

Remuneration Policy

The preparation of the Bank's remuneration policy always prioritizes the principle of prudence and refers to the laws and regulations that apply to the banking sector and SOE, including POJK No. 45/POJK.03/2015 dated December 23, 2015, and SE OJK No. 40/SEOJK.03/2016 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks, Regulation of the Minister of State-Owned Enterprises Number PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises and POJK No. 17 of 2023 concerning Implementation of Governance for Commercial Banks.

BNI's Remuneration Policy is regulated in the Good Corporate Governance Policy, Company

Guidelines No. IN/097/CMP/001 dated August 28, 2024, which has been updated and approved by the Board of Commissioners through BNI Board of Commissioners Letter No. DK/237 dated December 31, 2024, which generally regulates:

1. The remuneration structure includes at least a remuneration scale based on level and position, as well as remuneration components, and
2. Methods and mechanisms for determining remuneration for the Board of Directors, Board of Commissioners, and Bank employees.

BNI always applies the principles of good governance in terms of providing remuneration by considering various aspects, namely:

1. Creating effective risk management;
2. Bank financial stability;
3. Adequacy and strengthening of Bank capital;
4. Short-term and long-term liquidity needs; and
5. Potential income in the future.

REMUNERATION POLICY SCOPE

The Bank provides remuneration to the Board of Directors, the Board of Commissioners, and employees in the form of:

1. Fixed remuneration, namely remuneration that is not linked to performance and risk, including basic salary, facilities, housing allowance, health allowance, education allowance, holiday allowance, and pension. Determination of remuneration must always consider business scale, business complexity, peer group, inflation rate, condition, and financial capacity and does not conflict with applicable laws and regulations.
2. Variable remuneration, namely remuneration that is linked to performance and risk, including bonuses or other equivalent forms. Variable remuneration is carried out to encourage prudent risk taking.

Remuneration Policy Linked to Risk

The Remuneration Policy prepared in the context of creating effective risk management is reflected in:

1. Application of the prudent principle in providing remuneration.
2. The role of the Board of Commissioners in supervising the implementation of remuneration policies.
3. The role of the Board of Commissioners in carrying out regular evaluations of remuneration policies.
4. Risk-linked remuneration policy aims to:
   a. Prevent the emergence of moral hazard and prioritize prudential elements in bank management.
   b. Maintaining the health of the Bank individually.
   c. Mitigating excessive risk taking by decision-makers.
5. Determination of income in the form of salary or honorarium, allowances, and permanent facilities is carried out by considering risks, business scale factors, business complexity factors, inflation rates, company financial conditions and capabilities, and other relevant factors, and must not conflict with legislation.
6. Variable remuneration in the form of tantiem/performance incentives/Long Term Incentives (LTI), which consider, among other things, risk, performance factors, and the Company's financial capabilities, as well as other relevant factors.
7. Implementation of deferred variable remuneration (Malus) or withdrawing variable remuneration that has been paid (Clawback) to officials classified as Material Risk Takers (MRT), in accordance with the provisions of Article 26 POJK No. 45/POJK.03/2015 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks. Malus and/or Clawback against MRT is applied in the case of: [ACGS D.3.13]
   a. It is legally proven that there was abuse of position and/or authority and/or committing a criminal act by the recipient of the suspended Tantiem, which resulted in losses for the Company.
   b. Restatement of the Company's financial statement, which is the basis for determining the award of Tantiem.
   c. The risk rating in the last quarter before the implementation of the suspended Tantiem was 4 (Moderate to High) or worse.
   d. The Annual GMS decided to reject the responsibility of the Board of Directors and/or the Board of Commissioners for the Company's performance for the financial year as decided at the Annual GMS
   e. Other considerations deemed important by the GMS.

Determination of Material Risk Takers (MRT)

Determination of Material Risk Takers (MRT) is categorized as follows:

1. Material Risk Takers (MRT) can be determined using qualitative methods according to the portion of responsibility that influences the main risk profile, which will be determined in accordance with the risk profile evaluation determined by the Company every year.

2. Determining the MRT category can also be done quantitatively through a comparison of variable remuneration between MRT and non-MRT employees, taking into consideration the performance and risk level of the position concerned.

BNI appointed members of the Board of Commissioners, the Board of Directors, and Senior Executive Vice President (SEVP) as MRT.

REMUNERATION LINKED TO RISK AND PERFORMANCE [ACGS C.3.3 (B).B.1.5, (B).B.1.6]

BNI implements a competitive and fair remuneration scheme while still paying attention to achieving short-term and long-term Bank performance targets and considering relevant risk profiles, compliance, and the application of GCG principles in all aspects of the Bank's business and operations. The Bank's performance assessment is determined through an approach to achieving Key Performance Indicators (KPI) as the basis for the Bank's consideration in determining the remuneration of the Board of Commissioners and the Board of Directors. By considering the KPI results, the Nomination and Remuneration Committee provides recommendations to the Board of Commissioners regarding the amount of remuneration that members of the Bank's Board of Commissioners and the Board of Directors should receive. These recommendations are then submitted by the Board of Commissioners to shareholders through the GMS to obtain approval.

In addition to focusing on achieving performance, the Bank also always pays attention to the principle of prudence, which aims to encourage prudent risk taking in order to maintain the Bank's business continuity in the long term. Therefore, BNI implements a risk-based remuneration system by determining Material Risk Takers (MRT) and also implementing a deferred remuneration payment scheme. The main types of risk in the remuneration policy are adjusted to a review of the Bank's risk profile, which is determined annually by observing market conditions, industrial developments, performance, certain positions, and the Bank's financial capabilities. This main risk profile has an impact on the implementation of variable remuneration. Regarding this policy, BNI carries out regular evaluations and studies in accordance with business needs and developments in the banking industry.

The implementation of Bank remuneration is linked to performance and risks, including:

1. Suspension of variable remuneration with the following conditions:
   a. For parties designated as MRT, part of the variable remuneration will be deferred.
   b. The amount of suspension for MRTs who are members of the Board of Directors and Board of Commissioners is a minimum of 10%.
2. The suspension (malus) or withdrawal (clawback) policy determination applies if the following conditions occur:
   a. It is proven that there is Individual Fraud.
   b. Restatement of the company's financial statement, which is the basis for determining variable remuneration.
   c. The risk rating in the last quarter before the payment of deferred variable remuneration is 4 (Moderate to High) or worse. [ACGS D.3.13, (B).B.1.6]

In addition to paying attention to risk, determining remuneration also pays attention to performance, the implementation of which is carried out through:

1. Determination of increases in remuneration for the Board of Directors, Board of Commissioners, and employees considers the previous year's performance evaluation.
2. Determination of variable remuneration considering the achievement of Key Performance Indicators (KPI) of at least 80%.

Variable Remuneration for the Board of Commissioners, the Board of Directors and Employees

Variable remuneration is remuneration that is linked to performance and risk, which is given in the form of bonuses or other equivalent forms.

1) Form and Reasons for Selecting Variable Remuneration

   Variable compensation determined based on performance achievements, namely as follows:

   1. Short Term Incentives

      Short Term Incentives are variable compensation promised by the Company at the beginning of the year to members of the Board of Directors and Board of Commissioners as well as employees. Short-Term Incentives aim to encourage the motivation of members of the Board of Directors and Board of Commissioners as well as employees, providing direct rewards for achieving and exceeding individual targets, work unit targets, and company targets.

   2. Long Term Incentives

      Long Term Incentives, hereinafter referred to as LTI, is income provided by the Company to members of the Board of Directors and Board of Commissioners whose performance and governance have approached international best practices.

3. Bonuses
   Bonuses are variable compensation that is not promised by the Company. Bonuses are given to employees in order to provide appreciation for the Company's performance achievements.

2) Reasons for differences in variable remuneration given to employees:
   1. BNI applies the Position Group concept, which consists of Support, Business, and Marketer Advisor. The provision of variable remuneration will differ between job groups, which is adjusted to a constant amount per position group in question.
   2. The Company provides greater variable compensation for marketers due to the following:
      a) Marketers are profit makers.
      b) Encourage marketers to exceed predetermined targets.
      c) Appreciation for marketers.

The factors causing differences in variable compensation are based on considerations of performance and competency achievements, including work unit performance and company performance.

Guaranteed Variable Remuneration Without Conditions for Candidates for Board of Commissioners, Candidates for Board of Directors, and/or Candidates for Employees

There is no variable remuneration that is unconditionally guaranteed by BNI to prospective Board of Directors, prospective Board of Commissioners, and/or prospective employees during the first 1 (one) year of employment.

Remuneration Policy Linked to Company Sustainability Performance

Remuneration for the Board of Directors and the Board of Commissioners is determined by considering Environmental, Social, and Governance (LST) aspects. In 2024, the remuneration of the Board of Directors and Board of Commissioners is linked to the achievement of the Board of Directors' KPIs for 2024, which include:

a. ESG Rating, which includes, among others:
   1) Financing environmental impact
   2) Consumer financial protection
   3) Human capital development
   4) Access to finance
   5) Privacy and data security
   6) Corporate governance
   7) Corporate behaviour
b. Social and Environmental Responsibility (TJSL).
c. Averaged diversity in nominated talent (women and young).
d. Realization of Distribution of People's Business Credit (KUR).
e. Sustainability Credit (Green Financing).

Independent Monitoring of Remuneration Policy Implementation

In order to ensure the independence of remuneration, BNI assigns internal audit function implementers to carry out control or supervision functions over the implementation of remuneration policies. The implementation of remuneration policies is also audited by external auditors.

Remuneration Policy Review

Management periodically conducts reviews of the employee remuneration and welfare system. The assessment is carried out by considering business scale factors, business complexity factors, inflation rates, company financial conditions and capabilities, and including generally accepted income levels in similar industries.

External Consulting Services and Consultant Duties Related to Remuneration Policy [ACGS (B).D.3.1]

BNI uses independent consultants in the field of remuneration for the Board of Commissioners, the Board of Directors and Employees to obtain data on the position of remuneration relative to market conditions. In 2024, BNI used Willis Tower Watson Indonesia consultants to prepare a review of remuneration policies and structures. The study was carried out by paying attention to the Company's internal and external conditions, including BNI and industry performance.

Procedure for Determining Remuneration for the Board of Commissioners and the Board of Directors

The remuneration of the Board of Commissioners and the Board of Directors is determined by the GMS, first through the following procedures:

1. An independent remuneration consultant prepares a study of the structure and nominal remuneration based on market data and considering the provisions of laws and regulations, then submits it to the Nomination and Remuneration Committee (KNR).
2. The results of the independent consultant's study are discussed at the KNR Meeting, and then recommended to the Board of Commissioners.
3. KNR recommendations are discussed at the Board of Commissioners Meeting.
4. Remuneration proposals are submitted by the Board of Commissioners to Series A Dwiwarna Shareholders to be proposed on the GMS agenda.

5. The GMS gives approval to the proposed Remuneration for the Board of Directors and Board of Commissioners and/or gives authority and power to Series A Dwiwarna Shareholders to determine the remuneration of members of the Board of Commissioners, and approves the granting of authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders to determine the Board of Directors' Remuneration. [ACGS D.3.12]
6. In the event that the GMS gives authority, the Series A Dwiwarna Shareholders determine the Remuneration of the Board of Commissioners and the Board of Directors.
7. By taking into account the GMS resolution, the Board of Commissioners determines the Remuneration for the Board of Directors based on the determination of Remuneration by Series A Dwiwarna Shareholders.

Remuneration Policy for the Board of Commissioners and the Board of Directors

1. The income of the Board of Directors and the Board of Commissioners is determined by the GMS.
2. Determination of income in the form of salary or honorarium, allowances, and permanent facilities is carried out by considering business scale factors, business complexity factors, inflation rates, company financial conditions and capabilities, and other relevant factors, and must not conflict with statutory regulations.
3. The determination of income in the form of variable tantiem/performance incentives/Long Term Incentives (LTI) (merit rating) is carried out by considering the Company's performance factors and financial capabilities, as well as other relevant factors, including the generally accepted level of income in the similar industry.

Indicators for Determining Remuneration for the Board of Commissioners and the Board of Directors

Based on SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, determining the remuneration of the Board of Commissioners must consider the following indicators:

1. Business scale factor.
2. Business complexity factor.
3. Inflation rate.
4. The Company's financial condition and capabilities; and
5. Other relevant factors, and must not conflict with statutory regulations.

Board of Commissioners Remuneration Structure [ACGS C.3.1, C.3.2]

The determination of remuneration components for members of the Bank's Board of Commissioners refers to the provisions of SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises and Letter of the Minister of BUMN No.SR-200/MBU/04/2024 dated April 3, 2024 concerning the Determination of the Income of the Board of Directors and the Board of Commissioners of PT Bank Negara Indonesia (Persero)Tbk in 2024. Disclosure of the types of remuneration and facilities that the Bank's Board of Commissioners is entitled to receive is explained as follows:

Remuneration Structure for the Board of Commissioners

Type of Remuneration/Facility	Description
Honorarium	
Honorarium Composition	• President Commissioner is 45% of the President Director's salary; • Vice President Commissioner at 42.5% of the President Director's salary; • Commissioners amounting to 90% of the President Commissioner's honorarium.
Allowances	
Religious Holiday	The Board of Commissioners is given a holiday allowance of 1 (one) times the honorarium.
Post-employment Insurance	• Given during office (from effective appointment until termination); • The premium borne by the Company is 25% (twenty five percent) of salary in one year; • Selection of programs for post-service insurance is determined by the Board of Directors and Board of Commissioners, coordinated by the unit that manages facilities and benefits for members of the Board of Directors and Board of Commissioners; • Premiums, contributions or other relevant terms for post-service insurance include premiums for accident and death insurance.
Transportation	The Board of Commissioners is given a transportation allowance of 20% (twenty percent) of the honorarium.
Facilities	
Health	• Health facilities are provided in the form of health insurance or reimbursement for medical expenses • Health facilities are provided in the form of: i. Health insurance program administered by the Social Security Administering Agency; ii. Outpatient care and medication; iii. Hospitalization and medication; iv. Medical check-up. • Health facilities are provided to members of the Commissioners as well as husband/wife and a maximum of 3 (three) children who have not reached the age of 25 (twenty five) years, provided that the child who is not yet 25 (twenty five) years old has ever been married or If you have ever worked, the person concerned is not entitled to health facilities. • In the event that the treating doctor provides a referral for treatment abroad, health facilities can be provided in full or in part by taking into account the company's financial capabilities. • Medical check-ups are provided with the following conditions: i. medical check-up is given 1 (one) time every year; and ii. medical check-ups are carried out within the country.

Type of Remuneration/Facility	Description
Legal Aid	• Legal assistance facilities are provided to members of the Board of Commissioners in the event that actions/deeds occur for and on behalf of the position of members of the Board of Commissioners which are related to the aims and objectives and business activities of the Company. • Legal assistance facilities are provided by taking into account the principles of fairness, transparency and accountability in accordance with applicable regulations, as well as taking into account the Company's financial capabilities. • Legal aid facilities are provided in the form of: i. financing legal services which includes the process of providing information, examining witnesses, suspects and defendants in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; ii. financing legal services as a witness or defendant in legal disputes in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; and iii. transportation and accommodation costs in connection with the legal process. • Legal aid facilities can be charged to the Company only for 1 (one) legal service provider for 1 (one) specific case. • The appointment of legal service providers is carried out by the Company in accordance with the provisions for the procurement of goods and services that apply to the Company. • In the event that a member of the Board of Commissioners uses a legal service provider of their own choice or is involved in the process of appointing a legal service provider, whether at the level of inquiry/investigation, court of first instance, appeal, cassation or judicial review, the costs of the attorney/legal consultant are not borne/reimbursed by the Company. • In the event that a member of the Board of Commissioners is acquitted/declared not guilty by a court with a decision that has permanent legal force, then the legal aid facilities are at the expense of the Company. • As long as the legal matter does not yet have permanent legal force, the retirement insurance for the Commissioner in question is not paid and is placed in a special account as collateral for the legal costs incurred by the Company. • The Company does not provide legal assistance facilities in the event that members of the Board of Commissioners become witnesses, suspects or defendants due to criminal proceedings or defendants due to proceedings other than criminal cases reported by: i. Company; ii. State, as a legal entity or state institution or government institution; or iii. Certain parties determined by the GMS/Minister; • Commissioners who use legal aid facilities must provide a duly stamped statement explaining the following: i. that the capacity of Commissioners in certain cases is not an individual; ii. willing to use post-service insurance as collateral for legal costs incurred by the Company; iii. willing to return the costs incurred for providing legal aid facilities to the Company if it is proven that the capacity of the member of Commissioners concerned in the case is as an individual; and iv. willing to replace/refund the costs incurred by the company if a member of the Commissioner is found guilty by a court with a decision that has permanent legal force. • The Company must provide legal assistance facilities to former members of the Commissioners in the event of legal problems arising because the person concerned carries out actions/deeds for and on behalf of their position relating to the aims and objectives and business activities of the Company, which they carried out while the person concerned served as a member of the Board of Commissioners. • Provisions regarding the provision of legal aid facilities, mutatis mutandis apply to the provision of legal aid facilities for former Commissioners. • Procedures for legal assistance for members of the Board of Commissioners are carried out in accordance with applicable laws and regulations, in particular the Regulation of the Minister of State for State-Owned Enterprises which regulates Guidelines for Determining the Income of Directors, Board of Commissioners and Supervisory Boards of State-Owned Enterprises.

Total Nominal and Components of Remuneration for the Board of Commissioners [ACGS C.3.1, C.3.2]

Disclosure of remuneration components for the Board of Commissioners is guided by SE OJK No. 40/SEOJK.03/2016 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks and the results of the 2024 Annual GMS resolution, which stipulates that members of the BNI Board of Commissioners are entitled to a certain amount of remuneration consisting of honorarium, transportation allowance, holiday allowance, and other facilities such as health facilities and post-service insurance. Detailed information regarding the remuneration structure and other facilities received by members of the BNI Board of Commissioners in 2024 is as follows:

No.	Name	Position	Remuneration						Other Facilities in the Form of Nature				Total [ACGS D.3.2, D.3.4]
			Honorarium	Holiday Allowance	Housing Allowance	Transportation Allowance	Tantiem	LTI Allocation (2024-2026)	Housing (cannot be owned)	Transportation (cannot be owned)	Post-Service Insurance	Health (cannot be owned)	
1	Pradjoto	President Commissioner/ Independent Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
2	Pahala Nugraha Mansury	Vice President Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
3	Sigit Widyawan	Independent Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
4	Askolani	Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
5	Asmawi Syam	Independent Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
6	Septian Hario Seto	Independent Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
7	Iman Sugema	Independent Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
8	Erwin Rijanto Slamet	Independent Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
9	Fadlansyah Lubis	Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
10	Robertus Billitea	Commissioner	✓	✓	✗	✓	✓	✓	✗	✗	✓	✓	✓
11	Mohamad Yusuf Permana	Commissioner	✓	✓	✗	✓	✗	✓	✗	✗	✓	✓	✓
	Total (IDR million)		IDR24,950	IDR2,079	-	IDR4,990	IDR172,380	IDR74,830	-	-	IDR4.631	IDR2.878	IDR286.739

Meanwhile, the remuneration package received by the Board of Commissioners when grouped based on income level within 1 (one) year is as follows:

Group of Total Remuneration for the Board of Commissioners

Total Remuneration per Person	Total Commissioner	IDR million
> Rp2 billion	11	286,739
> Rp1 billion – Rp2 billion	-	-
> Rp500 million – Rp1 billion	-	-
< Rp500 million	-	-

In detail, the remuneration structure and facilities for members of the Board of Commissioners are as follows:

Remuneration and Facilities Packages Received by the Board of Commissioners

Type of Remuneration and Facility	Amount Received in 1 (one) Year	
	Board of Commissioners	
	Person	IDR million
a. Salary, bonus, regular allowance, tantiem, and other facilities in the form of non-natura	11	204.400
b. Long Term Incentives (LTI) Allocation 2024-2026	11	74.830
Other Facilities in the Form of Nature (housing, Health insurance, and etc.):		
a. Can be Owned	11	4.631
b. Cannot be Owned	11	2.878
Total	**11**	**286.739**

Fixed Remuneration for the Board of Commissioners

Fixed Remuneration		Person	Net (IDR million)
1.	Cash	11	36.651
2.	Shares/share-based instruments issued by the Bank	11	-

Variable Remuneration for the Board of Commissioners

a. Short Term Incentives (Tantiem) [ACGS C.3.3]

In 2024, the Bank has paid Tantiem to the Board of Commissioners amounting to 2.76% (two-point seventy-six percent) of the Bank's net profit for the period January 1, 2023-December 31, 2023. The Tantiem is distributed to members of the Board of Commissioners in proportion to the basis for calculating the President Director, namely, the President Commissioner at 45%, Deputy President Commissioner at 42.5%, and other Commissioners at 90% of the President Commissioner's tantiem. In order to comply with Article 23 POJK No. 45/POJK.03/2015 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks, the Bank has paid Tantiem for the performance of the 2023 financial year amounting to 20% (twenty percent) of the total Tantiem paid as Deferred Variable Remuneration to the parties who are Material Risk Takers (MRT).

Tantiem in the form of deferred variable remuneration for MRT, in this case to members of the Non-Independent Board of Commissioners, is given in the form of BNI shares, while to members of the Independent Commissioners, it is given in cash in the form of deposits. In accordance with applicable regulations, the Bank can postpone the payment of deferred Variable Remuneration (malus) or withdraw Variable Remuneration that has been paid (clawback) to parties who become MRTs under certain conditions. [ACGS D.3.13]

Variable Remuneration	Amount Received in 1 (one) Year	
	Board of Commissioners	
	Person	IDR million
Total	**11**	**172.380**

b. Long Term Incentives

Long Term Incentives (LTI) Allocation	Amount Received in 1 (one) Year	
	Board of Commissioners	
	Person	IDR million
Total	**11**	**74.830**

Board of Directors' Remuneration Structure [ACGS C.3.1, C.3.2]

The determination of remuneration components for members of the Bank's Board of Directors refers to the provisions of Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises and Letter of the Minister of SOE No. SR-200/MBU/04/2024 dated April 3, 2024 concerning the Determination of the Income of the Board of Directors and Board of Commissioners of PT Bank Negara Indonesia (Persero)Tbk in 2024. Disclosure of the types of remuneration and facilities that BNI Board of Directors are entitled to receive is explained in the table below:

Remuneration Structure for Member of the Board of Directors

Type of Remuneration/ Facility	Description
Salary	
Salary Components	• President Director is 100%; • Vice President Director is 90% of the Salary of President Director; • Other Directors is 85% of the salary of the President Director.
Allowances	
Religious Holidays	Members of the Board of Directors are given allowance for Religious Holiday for 1 (one) time salary each year.
Post-Employment Insurance	• Post-employment Insurance, including the insurance program organized by the Employment Social Security Agency, is provided during his/her tenure. • The premium borne by the Company is 25% (twenty-five percent) of salary in one year; • The selection of the program for post-employment insurance is determined by the Board of Directors and the Board of Commissioners coordinated by the unit that manages the facilities and benefits of members of the Board of Directors and the Board of Commissioners; • The provision of premiums, dues or other relevant terms for post-employment insurance includes premiums for accident and life insurance.
Housing Allowance	Members of the Board of Directors are entitled to a housing allowance including utility costs on a monthly basis, the amount of which is determined by the Minister, amounting to IDR27,500,000 per month.
Facilities	
Vehicles	• Members of the Board of Directors are provided with 1 (one) official vehicle and 1 (one) driver which can be used full time by members of the Board of Directors with overtime pay borne by the Company; • Vehicle specifications and types are determined by the Company, with a maximum limit of 3,500 cc for oil-fueled vehicles or a maximum limit of 100 kWh for battery electric vehicles. • Maintenance costs and vehicle operational costs as well as other costs arising in connection with official vehicle facilities are borne by the Company at cost (at cost); • Members of the Board of Directors who ceased serving are required to return their official vehicles to the Company within a period of no later than 30 (thirty) days.
Health	• Health facilities are given in the forms of health insurance or reimbursement of medical expenses; • Health facilities are provided in the forms of: i. Health insurance program administered by the Social Security Administering Agency; ii. Outpatient and medicine; iii. Inpatient and medicine; iv. Medical check-up, 1 (one) time every year and taken domestically. • Health facilities are provided to members of the Board of Directors as well as husband/wife and a maximum of 3 (three) children who have not yet reached the age of 25 (twenty five) years, provided that the child who is not yet 25 (twenty five) years old has ever been married or have ever worked, the person concerned is not entitled to health facilities. • In the event that the treating doctor provides a referral for treatment abroad,The provision of health facilities can be provided in full or in part by taking into account the company's financial capabilities. i. Medical check-ups are provided with the following conditions: ii. Medical check-up is provided 1 (one) time every year; and iii. Medical check-ups are carried out within the country.

Type of Remuneration/ Facility	Description
Legal Aid	• Legal assistance facilities are provided to members of the Board of Directors in the event of actions/deeds for and on behalf of the position of members of the Board of Directors which are related to the aims and objectives and business activities of the Company; • Legal aid facilities are provided by taking into account the principles of fairness, transparency and accountability in accordance with applicable regulations, as well as taking into account the Company's financial capabilities. • Legal aid facilities are provided in the form of: i. financing legal services which includes the process of providing information, examining witnesses, suspects and defendants in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; ii. financing legal services as a witness or defendant in legal disputes in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; and iii. transportation and accommodation costs in connection with the legal process. • Legal aid facilities can be charged to the Company only for 1 (one) legal service provider for 1 (one) specific case. • The appointment of legal service providers is carried out by the Company in accordance with the provisions for the procurement of goods and services that apply to the Company. • In the event that a member of the Board of Directors uses a legal service provider of their own choice or is involved in the process of appointing a legal service provider, whether at the level of inquiry/investigation, court of first instance, appeal, cassation or judicial review, the costs of the attorney/legal consultant are not borne/reimbursed by the Company. • In the event that a member of the Board of Directors is acquitted/declared not guilty by a court with a decision that has permanent legal force, then the legal aid facility is at the expense of the Company. • As long as the legal matter does not yet have permanent legal force, post-service insurance for members of the Board of Directors is not paid and is placed in a special account as collateral for legal costs incurred by the Company. • The Company does not provide legal assistance facilities in the event that members of the Board of Directors become witnesses, suspects or defendants due to criminal proceedings or defendants due to proceedings other than criminal cases reported by: i. Company; ii. The State, as a legal entity or State institution or government institution; or iii. Certain parties determined by the GMS/Minister; • Members of the Board of Directors who use legal aid facilities must provide a stamped statement stating the following: that the capacity of members of the Board of Directors in certain cases is not individual; i. willing to use post-service insurance as collateral for legal costs incurred by the Company; ii. willing to return the costs incurred for providing legal assistance facilities to the Company if it is proven that the capacity of the member of the Board of Directors concerned in the case is an individual; and iii. willing to replace/refund the costs incurred by the company if a member of the Board of Directors is found guilty by a court with a decision that has permanent legal force. • The company must provide legal assistance facilities to former members of the Board of Directors in the event of legal problems arising because the person concerned carries out actions/deeds for and on behalf of their position relating to the aims and objectives and business activities of the Company, which they carried out while the person concerned served as a member of the Board of Directors. • Provisions regarding the provision of legal aid facilities, mutatis mutandis apply to the provision of legal aid facilities for former members of the Board of Directors. • The legal assistance procedures for Directors are carried out in accordance with applicable laws and regulations, in particular the Regulation of the Minister of State for State-Owned Enterprises which regulates Guidelines for Determining the Income of Directors, Board of Commissioners and Supervisory Board of State-Owned Enterprises.

Total Nominal and Remuneration Components of the Board of Directors [ACGS C.3.4]

Disclosure of the Board of Directors' remuneration components refers to SEOJK No. 40/SEOJK.03/2016 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks and is guided by the results of the 2024 Annual GMS resolution, which stipulates that members of the BNI Board of Directors are entitled to a certain amount of remuneration consisting of basic salary, transportation allowance, housing allowance, holiday allowance, and other facilities such as health facilities and post-service insurance. Detailed information regarding the remuneration structure and other facilities received by members of the BNI Board of Directors in 2024 is as follows:

No.	Name	Position	Remuneration						Other Facility in the form of Nature				Total [ACGS D.3.2, D.3.4]
			Salary	Holiday Allowance	Housing Allowance	Transportation Allowance	Tantiem	LTI Allocation (2024-2026)	Housing (Cannot be Owned)	Transportation Cannot be Owned	Post Employment (can be Owned)	Health Cannot be Owned	
1	Royke Tumilaar	President Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
2	Putrama Wahju Setyawan	Deputy President Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
3	Novita Widya Anggraini	Finance Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
4	Corina Leyla Karnalies	Retail Banking Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
5	David Pirzada	Risk Management Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
6	Ronny Venir	Network and Services Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
7	Mucharom	Human Capital and Compliance Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
8	Toto Prasetio	Technology and Operations Director	✓	✓	✓	✗	✓	✓	✗	✓	✓	✓	✓
9	I Made Sukajaya	Enterprise and Commercial Banking Director	✓	✓	✓	✗	✗	✓	✗	✓	✓	✓	✓
10	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	✓	✓	✓	✗	✗	✓	✗	✓	✓	✓	✓
11	Agung Prabowo	Wholesale and International Banking Director	✓	✓	✓	✗	✗	✓	✗	✓	✓	✓	✓
12	Munadi Herlambang*	Institutional Banking Director	✓	✓	✓	✗	✗	✗	✗	✓	✓	✓	✓
Total (IDR million)			IDR57,408	IDR4,784	IDR3,960	-	IDR403.965	IDR158,925	-	IDR9,192	IDR10,685	IDR2,535	IDR651,454

* Has not been effective

Meanwhile, the remuneration package received by the Board of Directors when grouped based on income level within 1 (one) year is as follows:

Group Total Board of Directors Remuneration

Total Remuneration per Person	Total Directors	IDR million
> Rp2 billion	12	651,454
> Rp1 billion – Rp2 billion	-	-
> Rp500 million – Rp1 billion	-	-
< Rp500 million	-	-

In detail, the remuneration structure and facilities for members of the Board of Directors are as follows:

Group of Total Remuneration of the Board of Directors

Type of Remuneration and Facilities	Amount Received in 1 (one) Year	
	Board of Directors	
	Person	IDR million
a. Salary, bonus, routine allowance, tantiem, and other facilities in non-natura form	12	470,117
b. Allocation of Long Term Incentives (LTI) in 2024-2026	12	158,925
Other facilities in kind (housing, health insurance, etc.) which:		
a. Can be owned	12	10,685
b. Cannot be owned	12	11,727
Total	**12**	**651,454**

Fixed Remuneration for the Board of Directors

Fixed Remuneration		Person	Net (IDR million)
1.	Cash	12	86,029
2.	Shares/share-based instruments issued by the Bank	12	-

Variable Remuneration for the Board of Directors

a. Short Term Incentives (Tantiem)

In 2024, the Bank has paid Tantiem to the Board of Directors amounting to 2.76% (two-point seventy-six percent) of the Bank's net profit for the period January 1, 2023-December 31, 2023. The Tantiem is distributed to members of the Board of Directors in proportion to the basis for calculating the President Director, namely the Deputy President Director at 90%, and other members of the Board of Directors at 85%. In order to comply with Article 23 POJK No. 45/POJK.03/2015 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks, the Bank has paid Tantiem for the performance of the 2023 financial year amounting to 20% (twenty percent) of the total Tantiem paid as Deferred Variable Remuneration to the parties who are Material Risk Takers (MRT).

Tantiem in the form of variable remuneration, which is deferred to MRT, in this case to members of the Board of Directors, is given in the form of BNI shares. In accordance with applicable regulations, the Bank can postpone the payment of deferred Variable Remuneration (malus) or withdraw Variable Remuneration that has been paid (clawback) to parties who become MRTs under certain conditions. [ACGS D.3.13]

Variable Remuneration	Amount Received in 1 (one) Year	
	Person	IDR million
Total	12	403,965

b. Long Term Incentives

Long Term Incentives (LTI) Allocation	Amount Received in 1 (one) Year	
	Person	IDR million
Total	12	158,925

Stock Options Owned by the Board of Commissioners, the Board of Directors, and Executive Officers

Throughout 2024, there were no BNI share options held by members of the Board of Commissioners, the Board of Directors, and Executive Officers.

Variable Remuneration for Employees

a. Annual Bonus and Discretionary Bonus

Variable Remuneration	Amount Received in 1 (one) Year	
	Person	IDR million
Total	25,682	1,205,880

b. Employee Stock Allocation (ESA) and Retention Program

Long Term Incentives (LTI) Allocation	Amount Received in 1 (one) Year	
	Person	IDR million
Total	1,138	101,847

Fixed Remuneration for MRT

No	MRT Party	Fixed Remuneration	
		Cash (IDR Million Net)	Shares (IDR Million Net)
1	Board of Commissioners	36,651	-
2	Board of Directors	86,029	-
3	SEVP	21,423	-

Variable Remuneration for MRT for 1 (one) Year (2024)

No	MRT Party	Variable Remuneration			
		Non Deferred		Deferred	
		Cash (Rp Million)	Shares	Cash (Rp Million)	Shares
1	Board of Commissioners				
	a. Independent Commissioner	57,161	-	14,290	-
	b. Non Independent Commissioner	34,119	-	-	1,762,932
2	Board of Directors	213,201	-	-	11,016,022
3	SEVP	23,125		5,781	2,781,806

Quantitative Information for Parties in the Material Risk Takers (MRT) Category

BNI designated members of the Board of Commissioners, the Board of Directors, and Senior Executive Vice President (SEVP) as Material Risk Takers (MRT). Quantitative information regarding the total remaining deferred remuneration that is exposed to both implicit and explicit adjustments, the total reduction in remuneration due to explicit adjustments during the reporting period, and the total reduction in remuneration due to implicit adjustments during the reporting period is as follows:

Types of Variable Remuneration	2024				2023			
	Deferred Remaining	Total Deduction During Reporting Period			Deferred Remaining	Total Deduction During Reporting Period		
		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Total (A)+(B)		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Total (A)+(B)
Board of Commissioners and Board of Directors								
Cash (IDR million)	IDR14,290	-	-	-	IDR2,786	-	-	-
Shares/Share-based instruments issued by the Bank (in number of shares and nominal amount of million Rupiah representing the conversion of such shares)	12,778,954 shares	-	-	-	2,421,468 shares	-	-	-
SEVP								
Cash (IDR million)	-	-	-	-	-	-	-	-
Shares/Share-based instruments issued by the Bank (in number of shares and nominal amount of million Rupiah representing the conversion of such shares)	2,781,806 shares	-	-	-	385,320 shares	-	-	-

BNI implements Malus and Clawback policies on variable remuneration given to parties categorized as MRTs. There was no reduction in remuneration in the reporting period of 2024 and 2023 due to the absence of Clawback triggers for each MRT which caused a reduction in Remuneration.

Highest and Lowest Salary Ratio

BNI pays attention to the principle of justice by continuing to strive for competitive remuneration to attract and retain the best talent. BNI's remuneration policy has been adapted to applicable laws and regulations. The following is the ratio of the highest and lowest salaries at BNI:

Subject	2024	2023
Highest and lowest Board of Commissioners salary ratio	1.11:1	1.11:1
Highest and lowest Board of Directors salary ratio	1.18:1	1.18:1
Highest Board of Directors salary ratio and highest employee salary ratio	2.53:1	2.50:1
Highest and lowest employee salary ratio	38.29:1	38.18:1

Total Severance Pay Given to Employees Affected by Termination of Employment and Total Nominal Severance Pay Paid

In 2024, a number of employees were terminated because they have reached retirement age or applied for early retirement at their own request. In this regard, the Bank has paid nominal severance pay in accordance with the applicable statutory provisions with the following description:

No.	Nominal amount of severance pay	Total Employee
1.	> Rp1 billion	5 persons
2.	> Rp500 million - Rp1 billion	16 persons
3.	< Rp500 million	949 persons

Diversity of the Board of Commissioners and the Board of Directors [ACGS (B)E.1.2]

BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS DIVERSITY POLICY

Diversity in the Board of Commissioners and the Board of Directors is an important pillar in good corporate governance practices. By creating a combination of characteristics in top management, it is expected that it will further enrich the Board of Directors' perspective in formulating appropriate and effective business strategies amidst the rapid challenges of the financial industry, as well as support objective discussions and decision-making, in line with the company's goals and long-term strategy. The General Meeting of Shareholders has appointed members of the Board of Directors and Board of Commissioners with a diverse composition based on age, educational background, expertise, work experience, and gender. [ACGS D.4.6]

BNI has a Diversity Policy for the Board of Commissioners and the Board of Directors, which is prepared based on provisions in the fields of Capital Markets, Banking, and international best practices. Good Corporate Governance Policy, Company Guidelines No. IN/097/CMP/001 dated August 28, 2024, which has been updated and approved by the Board of Commissioners through a Letter from the BNI Board of Commissioners No. DK/237 dated December 31, 2024 regulates that the replacement and/or appointment of members of the Board of Commissioners and the Board of Directors prioritizes professional composition, independence, suitability of competence, and pays attention to diversity in terms of education (field of study), work experience, age, expertise and representation of female, without distinction of ethnicity, religion and race, which is required appropriately in carrying out the duties and responsibilities of the Board of Directors and Board of Commissioners. The diversity policy is intended to be a reference in the succession policy for members of the Board of Directors and Board of Commissioners, ensuring that BNI has a talent pool that is in line with the diversity policy targets for the composition of the Board of Directors and Board of Commissioners.

DIVERSITY IN THE COMPOSITION OF MEMBERS OF THE BOARD OF COMMISSIONERS

Aspects of diversity in the composition of members of the Board of Commissioners include, among others:

1. Education/skills/work experience, having at least:
   a. 1 (one) member who has an educational background/expertise/work experience in the field of economics/business/finance;
   b. 1 (one) member who has educational background/skills/work experience in the banking industry;
   c. 1 (one) member who has an educational background/expertise/work experience in the field of risk management.
2. Gender
   Considering the gender diversity of members of the Board of Commissioners, with at least 1 (one) member of the Board of Commissioners being female.
3. Age
   a. The majority of members of the Board of Commissioners are over 50 years old (experienced and mature).
   b. There are members of the Board of Commissioners aged less than 50 years old (young leader).
4. Independence
   a. At least 50% (fifty percent) of the members of the Board of Commissioners are Independent Commissioners.
   b. Former members of the Board of Directors or Executive Officers or parties who have a relationship with the Bank who may influence the person's ability to act independently must undergo a cooling-off period of at least 1 (one) year prior to becoming an Independent Commissioner.

DIVERSITY IN THE COMPOSITION OF BOARD OF DIRECTORS MEMBERS

Aspects of diversity in the composition of members of the Board of Directors include, among others:

1. Education/skills/work experience, having at least:
   a. 1 (one) member who has an educational background/expertise/work experience in the field of economics/business/finance;
   b. 1 (one) member who has educational background/skills/work experience in the banking industry;

c. 1 (one) member who has an educational background/expertise/work experience in the field of risk management.

2. Gender
   Considering the gender diversity of members of the Board of Directors, with at least 1 (one) member of the Board of Directors being female.
3. Age
   a. The majority of members of the Board of Directors are over 50 years old (experienced and mature).
   b. There are members of the Board of Directors aged less than 50 years (young leaders).
4. Independence
   The majority of members of the Board of Directors are parties who are independent of the Bank's controlling shareholders.

ACHIEVEMENTS OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS' COMPOSITION DIVERSITY POLICY [ACGS (B).D.1.2]

In general, the composition of members of BNI's Board of Commissioners and Board of Directors in 2024 has fulfilled the diversity aspect as regulated in statutory regulations and the Diversity Policy for the Board of Commissioners and the Board of Directors.

Achievements of Diversity in the Composition of Members of the Board of Commissioners

	Objectives	Achievement
Work experience [ACGS D.4.6]	Diverse work experience, including: 1. Experience in economics/business: Experienced as a Member of the National Economic Council of the Republic of Indonesia, Executive Director of the Macroprudential Policy Department of Bank Indonesia, lecturer in the fields of economics, business, and public policy planning, Board of Director/Board of Commissioners/Executive Officers at non-banking companies, and investment analyst. 2. Experience in the banking sector: Experienced as a Board of Director/Board of Commissioners/Executive Officer, senior position holder in a bank or other financial services institution, Deputy Governor of Bank Indonesia, Member of the Board of Commissioners of the Deposit Insurance Corporation, banking supervisor, and Supervisory Board.	✔
	3. Experience in Government: Experienced as Deputy Cabinet Secretary, Deputy Minister of SOE, Deputy Minister of Foreign Affairs, Director General at the Ministry of Finance, Deputy Minister of SOE, and Deputy Minister of State Secretariat. 4. Experience in the field of Risk Management: All members of the Board of Commissioners have Competency Certification in the Field of Banking Risk Management Qualification 6 (six). There are members of the Board of Commissioners who are experienced as members of the Code of Ethics Board of the Risk Management Certification Body.	✔
Independence	There are 6 (six) of the total 11 (eleven) members of the Board of Commissioners who are Independent Commissioners.	✔
Age	The majority of members of the Board of Commissioners are over 50 years old and there is 1 (one) member of the Board of Commissioners who is less than 50 years old.	✔
Gender	All members of the Board of Commissioners are men. In carrying out its duties, the Board of Commissioners is assisted by Independent Members of the Board of Commissioners Committee who are male and female. There are 3 (three) female out of a total of 6 (six) Independent Members of the Board of Commissioners Committee. Every proposal for replacement and/or appointment of members of the Board of Commissioners considers the recommendations of the Nomination and Remuneration Committee, which always considers diversity aspects, one of which is related to gender.	✘

Achievements of Diversity in the Composition of the Board of Directors

	Objectives	Achievement
Education	The educational levels of members of the Board of Directors are varied, including Bachelor and Master levels, with various educational fields such as economics and development studies, financial management, business, accounting, risk management, forestry, agriculture, physics, engineering, animal husbandry, and agribusiness.	✔
Work Experience	Members of the Board of Directors have a variety of work experiences, namely as members of the Board of Directors and Board of Commissioners of banks, non-bank financial services institutions, and non-financial services companies.	✔
Independence	All members of the Board of Directors are independent parties from the controlling shareholders of the Bank and have no affiliation with fellow members of the Board of Directors and Board of Commissioners.	✔
Age	The majority of members of the Board of Directors are over 50 years old, and there are 3 (three) members of the Board of Directors who are less than 50 years old.	✔
Gender	There are 2 (two) members of the Board of Directors who are female out of a total of 12 (twelve) members of the Board of Directors.	✔

Disclosure of Affiliation Relationships Among The Board of Commissioners, Board of Directors, and Controlling Shareholders

In alignment with the principles of good corporate governance as stipulated in POJK No. 17 of 2023 regarding the Implementation of Governance for Commercial Banks, BNI ensures that all serving members of the Board of Commissioners and Board of Directors act independently and are free from any activities that may result in conflicts of interest, which could impair their ability to perform their duties professionally, objectively, and independently. This is evidenced by the absence of familial, financial, or managerial affiliations among members of the Board of Commissioners, Board of Directors, and controlling shareholders. BNI ensures that no members of the Board of Commissioners or Board of Directors have familial relationships up to the third degree, whether through direct lineage or collateral lineage, including relationships established through marriage.

In this annual report, the Bank transparently discloses information regarding the affiliation relationships of the Board of Commissioners and Board of Directors, including:

1. Affiliation relationships among members of the Board of Directors;
2. Affiliation relationships between members of the Board of Directors and members of the Board of Commissioners;
3. Affiliation relationships between members of the Board of Directors and the Major and/or Controlling Shareholders;
4. Affiliation relationships among members of the Board of Commissioners; and
5. Affiliation relationships between members of the Board of Commissioners and the Major and/or Controlling Shareholders.

BOARD OF COMMISSIONERS

Disclosure of the independence and affiliation relationships of members of the Board of Commissioners is presented in the table below:

Affiliated Relationships with Other Members of the Board of Commissioners, Members of the Board of Directors, and Controlling Shareholders

Name	Position	Family Relationship up to the Second Degree with						Financial Relationship With						Management Relations with Other Companies	
		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Pradjoto	President Commissioner/ Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Pahala Nugraha Mansury	Vice President Commissioner		✓		✓		✓		✓		✓		✓		✓
Sigit Widyawan	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Askolani	Commissioner		✓		✓		✓		✓		✓		✓		✓
Asmawi Syam	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Iman Sugema	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Septian Hario Seto	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓
Erwin Rijanto Slamet	Independent Commissioner		✓		✓		✓		✓		✓		✓		✓

Name	Position	Family Relationship up to the Second Degree with						Financial Relationship With						Management Relations with Other Companies	
		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Fadlansyah Lubis	Commissioner		✓		✓		✓		✓		✓		✓		✓
Robertus Billitea	Commissioner		✓		✓		✓		✓		✓		✓		✓
Mohamad Yusuf Permana	Commissioner		✓		✓		✓		✓		✓		✓		✓

*) Directly or indirectly

BOARD OF DIRECTORS

Disclosure of independence and affiliation of members of the Board of Directors can be seen in the table below:

Affiliated Relationships with Other Members of the Board of Directors, Members of the Board of Commissioners, and Controlling Shareholders

Name	Position	Family Relationship up to the Second Degree with						Financial Relationship With						Management Relations with Other Companies	
		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Royke Tumilaar	President Director		✓		✓		✓		✓		✓		✓		✓
Putrama Wahju Setyawan	Deputy President Director		✓		✓		✓		✓		✓		✓		✓
Corina Leyla Karnalies	Retail Banking Director		✓		✓		✓		✓		✓		✓		✓
Novita Widya Anggraini	Finance Director		✓		✓		✓		✓		✓		✓		✓
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking		✓		✓		✓		✓		✓		✓		✓
David Pirzada	Risk Management Director		✓		✓		✓		✓		✓		✓		✓
I Made Sukajaya	Enterprise and Commercial Banking Director		✓		✓		✓		✓		✓		✓		✓
Ronny Venir	Network and Services Director		✓		✓		✓		✓		✓		✓		✓
Munadi Herlambang**	Institutional Banking Director		✓		✓		✓		✓		✓		✓		✓
Toto Prasetio	Director of Technology and Operations Director		✓		✓		✓		✓		✓		✓		✓
Agung Prabowo	Wholesale and International Banking Director		✓		✓		✓		✓		✓		✓		✓
Mucharom	Human Capital and Compliance Director		✓		✓		✓		✓		✓		✓		✓

*) Directly or indirectly
**) Has not been effective

Committees under the Board of Commissioners

To enhance the effectiveness of its supervisory and advisory functions for the Board of Directors, the Board of Commissioners is authorized to establish several committees under its oversight, namely the Audit Committee, the Remuneration and Nomination Committee, the Risk Monitoring Committee, and the Integrated Governance Committee. The establishment of these committees has been carried out in compliance with applicable laws and regulations governing publicly listed companies, the banking sector, and State-Owned Enterprises (BUMN).

Audit Committee [ACGS D.2.18]

The Board of Commissioners has established the Audit Committee to assist in the execution of its supervisory duties and functions. This includes reviewing the Bank's internal control system, the quality of its Financial Statements, the effectiveness of the Internal Audit function, and the overall implementation of the Board of Directors' functions in accordance with prevailing laws and regulations as well as Good Corporate Governance (GCG) principles.

Legal Basis for the Establishment of the Audit Committee

The legal basis for the establishment of BNI's Audit Committee refers to the following regulations:

1) Financial Services Authority (OJK) Regulation No. 55/POJK.04/2015 dated December 23, 2015, concerning the Establishment and Implementation Guidelines for the Audit Committee;
2) Financial Services Authority (OJK) Regulation No. 1/POJK.03/2019 dated January 28, 2019, concerning the Implementation of the Internal Audit Function in Commercial Banks;
3) Financial Services Authority (OJK) Regulation No. 9 of 2023, concerning the Use of Public Accountants and Public Accounting Firms in Financial Services Activities;
4) Financial Services Authority (OJK) Regulation No. 17 of 2023, concerning the Implementation of Governance for Commercial Banks;
5) Financial Services Authority (OJK) Regulation No. 15 of 2024, concerning the Integrity of Financial Reporting;
6) Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-2/MBU/03/2023 concerning Governance Guidelines and Significant Corporate Activities for State-Owned Enterprises;
7) Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises; and
8) Board of Commissioners' Decree No. KEP/05/DK/2000 dated July 28, 2000, concerning the Establishment of the Audit Committee.

Audit Committee Charter [ACGS D.2.21]

In carrying out its duties and responsibilities, all members of the Audit Committee must adhere to the Audit Committee Charter, which was ratified through the Board of Commissioners' Decree No. KEP/018/DK/2024 dated June 6, 2024, concerning the Audit Committee Charter and Code of Ethics of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk. The Audit Committee Charter is a written document that regulates the committee's structure, membership requirements, tenure, duties and responsibilities, authority, meeting procedures, and reporting obligations. The charter also outlines the Audit Committee's Code of Ethics, which includes integrity, objectivity and independence, competence, and confidentiality.

The scope of the Audit Committee Charter includes:

1. Legal basis;
2. Organizational structure and membership of the Audit Committee;
3. Membership requirements of the Audit Committee;
4. Duties and responsibilities of the Audit Committee;
5. Term of office of the Audit Committee;
6. Authority of the Audit Committee;
7. Audit Committee meetings; and
8. Reporting.

The Audit Committee Charter is reviewed periodically and may be updated as necessary while complying with applicable laws and regulations. The latest update to the Audit Committee Charter was on June 6, 2024, and it has been published on BNI's website: (https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Komite-Audit-2024.pdf].

Duties and Responsibilities of the Audit Committee

The Audit Committee has the following duties and responsibilities:

a. Ensuring the existence of adequate evaluation procedures for all information disclosed by the Bank;
b. Reviewing financial information issued by the Bank to the public and/or regulatory authorities, including financial statements, projections, and other reports related to the Bank's financial information;
c. Conducting reviews of compliance with laws and regulations relating to the Bank's activities;
d. Providing an independent opinion in the event of a difference of opinion between management and the Accountant regarding the services provided and non-conformity of the audit implementation by the Public Accounting Firm with applicable audit standards;
e. Provide recommendations to the Board of Commissioners based on the results of the evaluation regarding the appointment, reappointment, and dismissal or replacement of KAP and/or AP who will audit the financial statements based on independence, scope of assignment, and service fees; [ACGS D.2.24]
f. Reviewing complaints related to the Bank's accounting and financial reporting processes;
g. Recommending improvements to the management control system and its implementation;
h. Analyzing and advising the Board of Commissioners regarding potential conflicts of interest;
i. Identifying matters requiring the attention of the Board of Commissioners and other duties assigned to the Board;
j. Performing risk management-related tasks as stipulated by regulations;
k. Maintaining the confidentiality of documents, data, and information; and
l. Carrying out other assignments from the Board of Commissioners as regulated in the Audit Committee Charter.

Audit Committee Code of Ethics

In performing its duties and responsibilities, the Audit Committee adheres to the following principles:

1. Integrity
   Audit Committee members are committed to consistently aligning thoughts, words, and actions with fundamental ethical principles. In executing their duties, they must:
   i. Act honestly, diligently, and responsibly;
   ii. Comply with legal regulations and make disclosures in accordance with legal and professional standards;
   iii. Uphold professionalism and encourage others to act professionally;
   iv. Respect and support BNI's established Vision and Mission;
   v. Refrain from engaging in illegal activities or actions that could undermine the credibility of the Audit Committee; and
   vi. Avoid intentional misrepresentation or manipulation in carrying out their assigned duties and responsibilities.

2. Objectivity and Independence
   Audit Committee members provide fair and balanced assessments based on relevant conditions without being influenced by personal or external interests. In carrying out their duties, Audit Committee Members must:
   i. Maintain impartiality and prioritize stakeholders' interests above personal interests;
   ii. Disclose all material facts that, if withheld, could obscure the accuracy of reports;
   iii. Declare any relationships that could affect their judgment and create conflicts of interest; and
   iv. Not accept anything that could compromise or influence professional judgment.

3. Competence
   Audit Committee members utilize their knowledge, skills, and experience to fulfill their duties, responsibilities, and authority. They must:
   i. Carry out the duties, responsibilities and authority given in accordance with the competencies possessed;
   ii. Maintain and improve knowledge and skills continuously.

4. Confidentiality
   Audit Committee members safeguard confidential Bank information and uphold professional secrecy in accordance with the Bank's policies and applicable regulations. In carrying out their duties, Audit Committee Members must:

i. Exercise prudence in using and protecting information obtained in their role; and
ii. Not use confidential information for personal or external interests unless legally or professionally required.

Authority of the Audit Committee

The Audit Committee is granted the following authorities:

1) Accessing corporate documents, data, and information on employees, funds, assets, and resources, including all Bank activities;
2) Communicating directly with employees, including the Board of Directors, as well as internal audit, risk management, and external auditors regarding their responsibilities;
3) Engaging independent external parties as needed to support its tasks (if necessary); and
4) Exercising other authorities granted by the Board of Commissioners.

Appointment, Dismissal, and Term of Office of Audit Committee Members

Under OJK Regulation No. 17 of 2023 and BNI's Audit Committee Charter, the term of office for Audit Committee members appointed during the tenure of the Board of Commissioners expires concurrently with the Commissioners' tenure and may not exceed their tenure as Commissioners, and can be re-elected only for 1 (one) subsequent period. Meanwhile, the term of office of members of the Audit Committee who come from independent parties is a maximum of 3 (three) years and can be extended once for 2 (two) years of office so that the term of office of members of the Audit Committee who come from independent parties is a maximum of 5 (five) years, without reducing the right of the Board of Commissioners to be able to dismiss members of the committee at any time before the end of their term of appointment.

If the Audit Committee Chair, who is also a Commissioner, resigns before completing their term, another Independent Commissioner will assume the role. The President Commissioner cannot serve as the Audit Committee Chair unless under exceptional circumstances, which must be justified in the Annual Report. The Chairman and members of the Audit Committee are appointed and dismissed by the Board of Commissioners. The appointment and dismissal of members of the Audit Committee are reported to the GMS/Minister, and must be submitted to the Financial Services Authority within a maximum period of 2 (two) working days after the appointment or dismissal.

Structure, Membership, and Expertise of the Audit Committee

The composition of BNI's Audit Committee complies with applicable regulations and includes:

1) The Audit Committee is formed by and is responsible to the Board of Commissioners;
2) Members of the Audit Committee are appointed and dismissed by the Board of Commissioners;
3) Members of the Audit Committee consist of at least:
   a. One Independent Commissioner;
   b. One Independent Member with expertise in finance or accounting; and
   c. One Independent Member with expertise in law or banking.
4) Independent Commissioners and Independent Parties who are members of the Audit Committee must be at least 51% (fifty one percent) of the total number of members of the Audit Committee;
5) The Chairman of the Audit Committee may only hold concurrent positions as chairman of a committee in a maximum of 1 (one) other committee;
6) Members of the Audit Committee who are Independent Commissioners act as Chairman of the Audit Committee. In the event that there is more than one Independent Commissioner who is a member of the Audit Committee, one of them will act as Chairman of the Audit Committee.

Number, Structure, and Composition of Audit Committee Membership

The Audit Committee consists of a chairman and members who must be entirely independent and may come from outside the Bank, consisting of at least 3 (three) people, consisting of 1 Independent Commissioner, 1 Independent Party who has expertise in finance or accounting and 1 Independent Party who has expertise in law or banking. Members of the Audit Committee who are not members of the Board of Commissioners are a maximum of 2 (two) people. In addition, BNI's internal policy also stipulates that Members of the Board of Directors are prohibited from becoming members of the Audit Committee.

In 2024, the BNI Audit Committee consisted of 5 (five) members, including 3 (three) Independent Commissioners where one of them serves as Chairman and 2 (two) others are Independent Parties who have competence and qualifications

in accounting and banking finance. This composition shows that all parties appointed and serving as Chairpersons or members of the BNI Audit Committee are independent parties, either as Independent Commissioners of the Bank or professionals from outside the Bank. [ACGS D.2.19, D.2.20]

The number, composition, membership composition and independence of all members of the Audit Committee are ensured to have met the provisions set out in the Audit Committee Charter. The following is the composition of the BNI Audit Committee members throughout 2024:

January 1, 2024 – December 31, 2024 Period

Name	Position	Term of Office	Period	Position at the Bank [ACGS D.2.20]
Asmawi Syam	Chairman	July 20, 2020-present	First	Independent Commissioner
Sigit Widyawan	Member	September 8, 2020 - present	Second	Independent Commissioner
Iman Sugema	Member	September 8, 2020 - present	First	Independent Commissioner
Human Brillianto	Independent Member	January 25, 2021 - present	Second	-
Suhendi Muharam	Independent Member	July 5, 2021 - present	Second	-

As a form of compliance with POJK No. 55/POJK.04/2015 dated 23 December 2015 concerning the Establishment and Guidelines for the Implementation of the Audit Committee, information regarding the appointment and dismissal of the Audit Committee has been submitted to the OJK within a maximum period of 2 (two) working days after the appointment or dismissal, and has been published on the Stock Exchange website and/or the Bank's website.

Audit Committee Profile

Chairman of the Audit Committee [ACGS D.2.20]

Asmawi Syam	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/038/DK/2020 dated July 20, 2020
Term of Office	July 20, 2020 - Present
Professional Certication	- Certification of Competence in Banking Risk Management Qualification 7 - Indonesia Internal Audit Practitioner (IIAP) Certification - Certified Governance Oversight Professional (CGOP)
Complete Profile	The profile of the Audit Committee Chairman Asmawi Syam can be found in the Board of Commissioners' profile section in the Company Profile chapter

Member of the Audit Committee, concurrently as the Board of Commissioners

Sigit Widyawan	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/038/DK/2020 dated September 8, 2020
Term of Office	September 8, 2020 - Present
Professional Certication	- Certification of Competence in Banking Risk Management Qualification 6 - Indonesia Internal Audit Practitioner (IIAP) Certification
Complete Profile	Audit Committee Member, Sigit Widyawan, profile can be found in the of the Board of Commissioners Profiles.

Iman Sugema	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/039/DK/2020 dated September 8, 2020
Term of Office	September 8, 2020 - Present
Professional Certication	- Certification of Competence in Banking Risk Management Qualification 6 - Indonesia Internal Audit Practitioner (IIAP) Certification
Complete Profile	Audit Committee Member, Iman Sugema, profile can be found in the of the Board of Commissioners Profiles.

Member of the Audit Committee from Independent Party

Human Brillianto
Audit Committee Independent Member

Age
61 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor (S1) in Economics from Krisnadwipayana University (1987)
- Masters (S2) in Agribusiness Management from Gajah Mada University (2005)

Legal Basis for Appointment
- Appointed for the first time as Independent Member of the Audit Committee through Board of Commissioners Decree of the No. KEP/004/DK/2021/ dated January 25, 2021.
- Reappointed as an Independent Member of the Audit Committee through Board of Commissioners Decree No. KEP/003/DK/2024 dated January 21, 2024.

Term of Office
January 25, 2021 - Present (Second Period)

Professional Certifications and/or Training
- Risk Management Certification Level 2
- Certification in Audit Committee Practices (CACP)

Work Experience
- Branch Manager in several regions, PT Bank Rakyat Indonesia Tbk (1993-2000)
- Middle Staff of Retail Business Division, PT Bank Rakyat Indonesia Tbk (2000-2002)
- Group Head General Business Division, PT Bank Rakyat Indonesia Tbk (2002-2005)
- Senior Internal Audit Auditor, PT Bank Rakyat Indonesia Tbk (2005-2009)
- Group Head of Internal Audit, PT Bank Rakyat Indonesia Tbk (2009-2018)
- Deputy Inspector for Makassar Region, PT Bank Rakyat Indonesia Tbk (2018-2019)
- Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2021-present)

Concurrent Positions
No concurrent positions either internally at BNI or externally.

Suhendi Muharam
Audit Committee Independent Member

Age
62 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Engineering from Institut Teknologi Bandung (1987)
- Master of Management Degree from Universitas Gadjah Mada (2005)

Legal Basis for Appointment
- Appointed for the first time as Audit Committee Independent Member in July 2021 based on Board of Commissioners Decree No. KEP/012/DK/2021/dated July 5, 2021.
- Reappointed as an Independent Member of the Audit Committee through Board of Commissioners Decree No. KEP/020/DK/2024 dated July 4, 2024.

Term of Office
July 5, 2021 - Present (Second Period)

Professional Certifications and/or Training
- Risk Management Certification Level 4
- Certification in Audit Committee Practices (CACP)

Work Experience
- Head of Operations, Bandung Buah Batu Branch, Bank CIMB Niaga (1991-1992)
- Operational Audit Staff, Bank CIMB Niaga (1992-1995)
- Staff (Officer) Audit Policy and Administration, Bank CIMB Niaga (1995-1997)
- Head of Audit Policy and Administration, Bank CIMB Niaga (19971999)
- Head of Audit Resident IV, Bank CIMB Niaga (period of office: 1999-2000)
- Head of Asset Risk Audit Division, Bank CIMB Niaga (2000-2001)
- Head of Information Systems Technology Audit Division, Bank CIMB Niaga (2001-2005)
- Information Security and Systems Group Head, Bank CIMB Niaga (2006-2008)
- System Operation and Assurance Group Head, Bank CIMB Niaga (2008-2009)
- Process Quality Improvement Group Head, Bank CIMB Niaga (2010-20110)
- Business Process Management Group Head, Bank CIMB Niaga (2012-2013)
- Bank Niaga – Bank Lippo Operational Merger Project as Organization and Method Head, Bank CIMB Niaga (2008-2009)
- Core Banking System Replacement Project as Change Management and Training, Bank CIMB Niaga (2014-2016)
- Independent Audit Committee Member of PT Bank Negara Indonesia (Persero) Tbk (2021-present)

Concurrent Positions
No concurrent positions either internally at BNI or externally

Qualifications, Education, and Work Experience of the Audit Committee

The membership requirements for BNI's Audit Committee include the following:

1) Must possess high integrity, good character and morals, competence, knowledge, and experience relevant to their field of work, as well as strong communication skills.
2) Must not be an individual who has worked for or held authority and responsibility in planning, leading, controlling, or supervising the Company's activities within the past six (6) months, except for Independent Commissioners.
3) Must not be affiliated with a Public Accounting Firm, Law Firm, Public Appraisal Service Office, or any other party providing assurance services, non-assurance services, appraisal services, and/or other consulting services to the Company within the past six (6) months.
4) Must have a thorough understanding of financial statements, the Company's business—particularly in relation to its services or business activities—audit processes, risk management, and capital market regulations, as well as other relevant laws and regulations.
5) Must comply with the Audit Committee Code of Ethics established by the Company.
6) Must be willing to continuously enhance their competencies through education and training.
7) Must not hold direct or indirect shares in the Company.
8) In the event that an Audit Committee member acquires shares in the Company, whether directly or indirectly, due to a legal event, such shares must be transferred to another party within no more than six (6) months from the date of acquisition.
9) Must not have any affiliation with members of the Board of Commissioners, members of the Board of Directors, or the Company's Major Shareholders.
10) Must not have any direct or indirect business relationships related to the Company's business activities.

The expertise of the Audit Committee, particularly those from independent parties, must be demonstrated by holding at least one competency certification that supports the committee's functions and responsibilities. These may include certifications in risk management, public accounting, accountancy, and auditing. In accordance with these requirements, the Bank ensures that the Chairman and all serving members of the Audit Committee meet the educational and professional experience qualifications outlined in the table below.

Educational Qualifications and Work Experience, and Fields of Expertise of the Audit Committee

Name	Position	Education	Work Experience	Areas of Expertise
Asmawi Syam	Chairman	Educational history can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Banking • Finance
Sigit Widyawan	Member	Educational history can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting [ACGS D.2.22] • Finance
Iman Sugema	Member	Educational history can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Economics • Finance
Human Brillianto	Independent Member	Master's Degree in Agribusiness Management	Deputy Inspector of BRI Makassar, Group Head of Internal Audit, Senior Internal Audit Auditor, Group Head of General Business Division, Middle Staff of Retail Business Division, Branch Manager in several regions at PT Bank Rakyat Indonesia (BRI)	• Banking • Finance
Suhendi Muharam	Independent Member	Master's Ddegree in Agribusiness Management	• Head of Operations for Bandung Buah Batu Branch, Operational Audit staff, Head of Audit Policy and Administration, Head of Operational Audit Division, Head of Information System Technology Audit Division, Information Security and System Group Head, System Operation and Assurance Group Head, Process Quality Improvement Group Head • Business Process Management Group Head, and was involved in the Operational Merger Project of Bank Niaga – Bank Lippo as Organization and Method Head, and the Core Banking System Replacement Project as Change Management and Training at Bank Niaga (Bank CIMB Niaga)	• Banking • Technology

Statement of Independence of the Audit Committee

BNI ensures that all members of the Audit Committee serving during the current period meet the independence criteria, enabling them to perform their duties professionally and independently. All members of BNI's Audit Committee are independent parties with no financial, managerial, shareholding, and/or familial relationships with the Board of Commissioners, Board of Directors, and/or the Controlling Shareholder, nor do they have any affiliation with the Bank. The Bank's commitment to maintaining the Audit Committee's ability to act independently in providing fair and balanced assessments of the Bank's condition is reflected in its composition. The Audit Committee consists of one (1) Chairman, who is an Independent Commissioner, two (2) Audit Committee members who are also Independent Commissioners, and two (2) non-Commissioner members from outside the Bank. The composition has met the provisions of OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks. The policy regarding the independence criteria of the Audit Committee is regulated in the BNI Audit Committee Code of Ethics.

The independence aspects of each Audit Committee member are detailed in the following table.

Audit Committee Independency

Independency Aspect	Asmawi Syam	Sigit Widyawan	Iman Sugema	Human Brillianto	Suhendi Muharam
No financial relationships with the Board of Commissioners and the Board of Directors	✓	✓	✓	✓	✓
No management relationships in the company, subsidiaries or affiliated companies	✓	✓	✓	✓	✓
No share ownership relationship in the company	✓	✓	✓	✓	✓
No familial relationships with the Board of Commissioners, the Board of Directors, and/or fellow members of the Audit Committee	✓	✓	✓	✓	✓
Not serving on the board of political party or government official	✓	✓	✓	✓	✓

Dual Position Information

As a form of transparency, information on concurrent positions of Audit Committee members is described in the following table:

Name	Position in the Bank	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Asmawi Syam	Chairman of the Audit Committee and Independent Commissioner	None	None	None
Sigit Widyawan	Member and Independent Commissioner	None	None	None
Iman Sugema	Member and Independent Commissioner	None	None	None
Human Brillianto	Independent Member	None	None	None
Suhendi Muharam	Independent Member	None	None	None

Audit Committee Meetings

Meeting Implementation Policy [ACGS D.2.23]

As stipulated in the Audit Committee Charter, the policies and procedures for conducting BNI's Audit Committee Meetings are as follows:

1) The Audit Committee must hold meetings at least once a month.
2) An Audit Committee meeting is considered valid if attended by the majority of committee members.
3) Decisions in committee meetings are made based on deliberation and consensus. If consensus is not reached, decisions are made by a majority vote.
4) Meetings are chaired by the Chairman of the Audit Committee or by an Audit Committee member who is an Independent Commissioner if the Chairman is unable to attend.

5) Every Audit Committee meeting must be documented in minutes of the meeting, signed by all attending members. Any dissenting opinions must be explicitly recorded along with the reasoning behind the disagreement.
6) Meetings may be conducted physically or via video conference or other media that allow all participants to see and hear each other directly and actively participate in the meeting.
7) The attendance of committee members in meetings is reported in the quarterly and annual reports of the Committee.

Meeting Frequency and Attendance of Committee Members [ACGS D.2.23]

In 2024, the Audit Committee has conducted 31 (thirty-one) meetings, including internal committee meetings, joint meetings with Sector Directors and relevant Divisions, as well as Board of Commissioners Meetings attended by Audit Committee members to discuss substantive matters that need to be promptly reported to the Board of Commissioners.

The following shows the Audit Committee Meetings frequency and attendance rate in 2024:

Name	Position	Number of Meetings [ACGS D.2.23]	Attended [ACGS D.2.23]	Percentage [ACGS D.2.23]
Asmawi Syam	Chairman	31	31	100%
Sigit Widyawan	Member	31	31	100%
Iman Sugema	Member	31	31	100%
Human Brillianto	Independent Member	31	30*)	96,77%
Suhendi Muharam	Independent Member	31	31	100%

*) He did not attend 1 (one) Audit Committee Meeting because he participated in the Certification in Audit Committee Practices (CACP) from August 20 to 22, 2024.

Meeting Agenda [ACGS D.2.23]

During 2024, the Audit Committee Meetings dates, agenda and participants were as follows:

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
1	January 9, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all members of the Audit Committee
2	January 17, 2024	Closing Meeting Audit of BNI Consolidated Financial Reports and Other Reports for the Financial Year Ending December 31, 2023	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Finance Director • Risk Management Director • Wholesale & International Banking Director • Enterprise & Commercial Banking Director • Retail Banking Director • Technology & Operation Director • Network & Services Director • SEVP Corporate Banking • SEVP Treasury • SEVP Credit Risk • SEVP Remedial & Recovery • SEVP Information Technology • Tanudiredja, Wibisana, Rintis, and Partners Public Accounting Firm (KAP TWRR/Global Network Firm PwC) • Related Division
3	January 23, 2024	Evaluation of the Bank's Internal Audit Function for the Semester II/2023 period	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Audit Internal
4	January 30, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
5	February 6, 2024	Joint Meeting of the Audit Committee and Risk Monitoring Committee to discuss the Evaluation of the Implementation of the Bank's Compliance Function and the Implementation of the Anti-Fraud Strategy for the Q4/2023 period	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Risk Management Director • Human Capital & Compliance Director
6	February 6, 2024	Discussion of Internal Audit Report	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Audit Internal
7	February 13, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
8	February 20, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
9	March 26, 2024	Discussion of Proposed Credit Book Write-off Plan	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Risk Management Director • Wholesale & International Banking Director • Human Capital & Compliance Director • Internal Audit • Related Division
10	April 23, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
11	April 30, 2024	Evaluation of the Bank's Internal Audit Function for the first	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Audit Internal
12	May 7, 2024	Joint Meeting of the Audit Committee and Risk Monitoring Committee to discuss the Deepening Discussion of BNI's Financial Performance Evaluation for the period of Quarter I/2024.	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Wholesale & International Banking Director • Enterprise & Commercial Banking Director • Retail Banking Director • Digital & Integrated Transaction Banking Director • Network & Services Director • Risk Management Director • Technology & Operations Director • Institutional Banking Director • Related Division
13	May 17, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
14	June 4, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all members of the Audit Committee
15	June 19, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
16	June 25, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
17	July 2, 2024	Discussion of Internal Audit Report	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Risk Management Director • Network & Services Director • Retail Banking Director • Human Capital & Compliance Director • Internal Audit • Related Division
18	July 9, 2024	Evaluation of the implementation of the Bank's compliance function for the first quarter of 2024	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Risk Monitoring Committee • Human Capital & Compliance Director • Risk Management Director
19	July 16, 2024	Evaluation of the Bank's Internal Audit Function for the first quarter of 2024	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Audit Internal
20	August 13, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
21	August 20, 2024	Discussion on the Review Results of BNI's Internal Audit Function	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Suhendi Muharam	• Internal Audit • RSM Indonesia
22	September 10, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
23	September 24, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
24	October 15, 2024	Kick Off Meeting Audit of BNI Consolidated Financial Statements and Other Reports for Financial Year 2024 by KAP Rintis, Jumadi, Rianto, and Partner (KAP RJRR)	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Director of Finance • KAP RJRR
25	October 17, 2024	Discussion of Internal Audit Report	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Audit Internal
26	November 5, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
27	November 5, 2024	Discussion of Proposed Credit Book Write-off Plan	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Risk Management Director • Wholesale & International Banking Director • Human Capital & Compliance Director • Internal Audit • Related Division

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
28	November 19, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
29	November 19, 2024	Discussion of Proposed Credit Book Write-off Plan	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Risk Management Director • Enterprise & Commercial Banking Director • Human Capital & Compliance Director • Internal Audit • Related Division
30	December 10, 2024	Internal Audit Committee Meeting	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	Chairman and all other members of the Audit Committee
31	December 24, 2024	Progress Meeting Audit of BNI Consolidated Financial Statements and Other Reports for the Fiscal Year Ending December 31, 2024 by KAP Rintis, Jumadi, Rianto, and Partners (KAP RJRR)	• Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brillianto • Suhendi Muharam	• Finance Director • Risk Management Director • Technology & Operations Director • Network & Services Director • Enterprise & Commercial Banking Director • Retail Banking Director • SEVP Credit Risk • SEVP Information Technology • Related Division

Audit Committee Member Competency Improvement Program in 2024

In 2024, Audit Committee members have undertaken the following education or training:

Name of Training/Workshop/ Conference/seminar	Implementation Date	Organizer
Asmawi Syam – Chairman of the Audit Committee/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Sigit Widyawan – Member of Audit Committee/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024		
Iman Sugema – Member of Audit Committee/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Suhendi Muharam – Member of the Audit Committee (Independent Party)		
CACP Certification Training (Certification in Audit Committee Practices)	August 6-8, 2024	Indonesian Institute of Audit Committee
Compliance Forum: Realizing an Anti-Corruption Culture Through the Instillation of Integrity Values	August 14, 2024	BNI University
Human Brillianto – Member of the Audit Committee (Independent Party)		
CACP Certification Training (Certification in Audit Committee Practices)	August 20-22, 2024	Indonesian Institute of Audit Committee
Compliance Forum: Realizing an Anti-Corruption Culture Through the Instillation of Integrity Values	August 14, 2024	BNI University

Work Program and Implementation of Audit Committee Duties in 2024

In 2024, the Audit Committee has submitted reports on the execution of its duties and responsibilities concerning the work program that was presented to the Board of Commissioners at the beginning of the year. The execution of the Audit Committee's duties and responsibilities is carried out through Audit Committee Meetings with the Board of Directors, Third Parties engaged in Audit/Review or Reassessment Services, as well as through reviews and/or recommendations to the Board of Commissioners, which are conveyed in written reports or during Board of Commissioners Meetings with the Board of Directors.

Throughout 2024, the Audit Committee has performed its duties and responsibilities, including:

1. Reviewing financial information to be disclosed by the Company to the public and/or regulatory authorities.
2. Reviewing the Company's monthly performance reports.
3. Reviewing compliance with laws and regulations related to the Company's business activities.
4. Providing recommendations to the Board of Commissioners regarding the appointment of a Public Accountant (AP) and a Public Accounting Firm (KAP) for auditing the Consolidated Financial Statements and other reports for the 2024 financial year.
5. Evaluating the audit services performed by the appointed KAP for the Consolidated Financial Statements and other reports for the 2023 financial year, including assessing the independence and objectivity of the KAP, for submission to the Financial Services Authority (OJK) and the Ministry of State-Owned Enterprises (BUMN).
6. Carrying out tasks related to the Bank's Business Plan (RBB)/Corporate Budget Plan (RKAP) and the Sustainable Finance Action Plan, including reviewing the 2024 RBB revision, the 2025 RBB/RKAP, and the 2025 Sustainable Finance Action Plan.
7. Reviewing the audit findings from both internal and external auditors and overseeing the follow-up actions by the Board of Directors, covering:
   a. Reviewing the audit results conducted by OJK, BPK, KAP, BI, BPKP, and other regulators, as well as monitoring the follow-up actions taken based on these audit findings.
   b. Monitoring, advising, and overseeing the preparation of key audit findings reports for submission to OJK.
   c. Reviewing the planning and execution of compliance functions through assessments conducted by the Compliance Division, as well as overseeing follow-up actions based on these reviews.
   d. Monitoring the progress of employee case resolutions and follow-up actions related to fraud cases.
8. Carrying out assignments related to the Company's Internal Audit function, with the results forming the basis of the Audit Committee's recommendations to the Board of Commissioners for their approval or consideration, including:
   a. Reviewing proposals from the Board of Directors regarding the dismissal and appointment of the Internal Audit Head.
   b. Assessing the planning and execution of Internal Audit's 2024 audit and consultation functions.
   c. Reviewing proposed updates to BNI's Internal Audit Charter.
   d. Reviewing the proposal for appointing an external consultant to conduct an independent review of the Internal Audit function in 2024.
9. Evaluating BNI's Internal Control System, including.
   a. Assessing the implementation of the Whistleblowing System (WBS).
   b. Evaluating the implementation of the Anti-Fraud Strategy Program.
10. Conducting assignments related to the implementation of Internal Control Over Financial Reporting (ICOFR), including:
    a. Interviews with the Consultant responsible for the 2024 ICOFR Diagnostic process.
    b. Reviewing the diagnostic results of ICOFR and monitoring management's follow-up actions.
    c. Reviewing the proposed Company Guidelines on ICOFR Implementation at BNI.
    d. Providing recommendations to the Board of Commissioners regarding their response to the Roadmap for ICOFR Implementation.
11. Reviewing the implementation of the Company's Good Corporate Governance (GCG).
12. Carrying out duties related to BNI's Pension Fund (DPLK), including:
    a. Reviewing BNI DPLK's Business Performance realization as a recommendation for the Board of Commissioners in preparing the Supervisory Report on DPLK Business Performance to be submitted to OJK's Non-Bank Financial Industry (IKNB) division.
    b. Reviewing the Governance Implementation of BNI DPLK.
    c. Reviewing updates to the Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Financing for Weapons of Mass Destruction Proliferation (APU, PPT, PPPSPM) policies for BNI DPLK.
13. Reviewing management proposals that require the Board of Commissioners' approval regarding updates to Company Policies, including:
    a. Bank Credit Policy (KPB).
    b. Internal Control System Policy (KUSPI).
    c. Good Corporate Governance Policy.
    d. Write-Off Policy for MSME Loans.
    e. Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Financing for Weapons of Mass Destruction Proliferation (APU, PPT, PPPSPM) Policy for BNI.

14. Conducting Audit Committee Working Visits to evaluate the Credit Segment in Commercial Banking at BNI Regional Offices and Commercial Business Centers (CMC).
15. Preparing reports related to the execution of the Audit Committee's duties, including:
    a. The Audit Committee Report for the Annual Report.
    b. The quarterly report on the realization of the Audit Committee's work program.
16. Reviewing and assessing reports, proposals, or letters from Management and/or Regulators as assigned by the Board of Commissioners, including:
    a. Monthly reports on Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Financing for Weapons of Mass Destruction Proliferation (APU, PPT, PPPSPM) for BNI.
    b. Quarterly reports on Write-Off and Write-Down Realization by the Business Development Office (BDO).
    c. Proposals regarding Credit Write-Off Plans.
    d. Audit Reports.
    e. The name change of Public Accounting Firm (KAP) Tanudiredja, Wibisana, Rintis, and Partners (a member firm of PricewaterhouseCoopers) to KAP Rintis, Jumadi, Rianto, and Partners (a member firm of PricewaterhouseCoopers).
    f. Reports and/or letters from Regulators or External Auditors (OJK, BPK, KAP, KBUMN).
17. Coordinating with other Committees under the Board of Commissioners by attending Risk Monitoring Committee meetings. Throughout 2024, the Audit Committee has attended seven Risk Monitoring Committee meetings.
18. Attending meetings invited by the Ministry of State-Owned Enterprises (BUMN).

Implementation of the Audit Committee's Working Relationship with Internal Audit (IAD)

No.	Main Tasks	Implementation Details	Implementation Date
1.	Evaluation of the Bank's Internal Audit Function for the Second Semester of 2023	a. Realization of the Internal Audit Work Plan (RKAT) b. Review of the Key Findings of the Audit Report c. Follow-Up on the Results of IAD and External Auditor Inspections d. Management of the Whistle Blowing System (WBS)	January 23, 2024
2.	Discussion of Internal Audit Report	Discussion and Review of the Internal Audit Inspection Report	February 6, 2024
3.	Discussion of the Internal Audit Inspection Report Termination and Appointment of the Head of Internal Audit	Recommendations of the Audit Committee on the Termination and Appointment of the Head of Internal Audit	February 28, 2024
4.	Evaluation of the Integrated Audit Report for the Second Semester of 2023	Review of the Integrated Audit Report for the Second Semester of 2023	March 13, 2024
5.	Review of the 2024 Internal Audit and Consulting Plan	Recommendations of the Audit Committee on the 2024 Internal Audit and Consulting Plan	April 17, 2024
6.	Evaluation of the Bank's Internal Audit Function for the First Quarter of 2024	a. Realization of the Internal Audit Work Plan (RKAT) b. Review of the Key Findings of the Audit Report c. Follow-Up on the Results of IAD and External Auditor Inspections d. Management of the Whistle Blowing System (WBS)	April 30, 2024
7.	Evaluation of Internal Audit Inspection Results	Review of the Internal Audit Inspection Report	June 25, 2024
8.	Evaluation of the Bank's Internal Audit Function for the First Semester of 2024	a. Realization of the Internal Audit Work Plan (RKAT) b. Review of the Key Findings of the Audit Report c. Follow-Up on the Results of IAD and External Auditor Inspections d. Management of the Whistle Blowing System (WBS)	July 16, 2024
9.	Review of Independent Quality Control over BNI's Internal Audit Function	Recommendations of the Audit Committee on the Appointment of External Consultant Services for the Review of the Internal Audit Function in 2024	April 17, 2024
		Presentation of the Results of the Review of BNI's Internal Audit Function	August 20, 2024
10.	Discussion of the Internal Audit Inspection Report	Discussion and Review of the Internal Audit Inspection Report	October 17, 2024

Implementation of Audit Committee Working Relationship with Public Accountant and/or Public Accounting Firm [ACGS D.2.24]

No.	Main Tasks	Implementation Details	Implementation Date
1.	Procurement of Public Accounting Firm (KAP) Audit Services	1) Review of the Proposed HPS for the Procurement of KAP Services for 2024	February 15, 2024
		2) Recommendations of the Audit Committee on the Appointment of a Public Accounting Firm for the Audit of Consolidated Financial Statements and Other Reports for the 2024 Fiscal Year	February 22, 2024
2.	Financial Statements Evaluation Report	1) Closing Meeting for the Audit of Consolidated Financial Statements and Other Reports for the 2023 Fiscal Year	January 17, 2024
		2) Review of the Financial Statements for January 2024	March 4, 2024
		3) Review of the Financial Statements for February 2024	March 26, 2024
		4) Review of the Financial Statements for March 2024	April 24, 2024
		5) Review of the Financial Statements for April 2024	June 14, 2024
		6) Review of the Financial Statements for May 2024	July 1, 2024
		7) Review of the Financial Statements for June 2024	August 15, 2024
		8) Review of the Financial Statements for July 2024	September 11, 2024
		9) Review of the Financial Statements for August 2024	October 14, 2024
		10) Kick-Off Meeting for the Audit of Consolidated Financial Statements and Other Reports for the 2024 Fiscal Year	October 15, 2024
		11) Review of the Financial Statements for September 2024	October 16, 2024
		12) Review of the Financial Statements for October 2024	November 29, 2024
		13) Progress Meeting for the Audit of Consolidated Financial Statements and Other Reports for the 2024 Fiscal Year	December 24, 2024
		14) Review of the Financial Statements for November 2024	December 27, 2024
3.	Audit Committee Evaluation Report	1) Review of the Management Letter for the Audit of Consolidated Financial Statements and Other Reports for the 2023 Fiscal Year	May 17, 2024
		2) Evaluation of the Audit Committee on the Implementation of Audit Services by KAP for the 2023 Fiscal Year – submitted to the Ministry of State-Owned Enterprises and OJK	May 20, 2024

Implementation of the Audit Committee's Working Relationship with Financial Services Authority, Bank Indonesia and other Authorities

No.	Main Tasks	Implementation Details	Implementation Date
1.	General Inspection of BNI Year 2024 by OJK	Exit meeting of 2024	November 15, 2024
2.	General Inspection of BNI Year 2024 by BPK	Exit meeting of 2024	December 23, 2024

Implementation of the Audit Committee's Working Relationship with Management

No.	Main Tasks	Implementation Details	Implementation Date
1.	Audit Committee Advice and Counsel	1) Review and Recommendations on the Proposal for Loan Write-Off	March 26, 2024
		2) Review and Recommendations on the Proposal for the Review/ Updating of BNI's GCG Policy	May 22, 2024
		3) Review and Recommendations on the Proposal for Loan Write-Off	May 29, 2024
		4) Review and Recommendations on the Proposal for the Review of the Compliance Charter for 2024	May 30, 2024
		5) Review and Recommendations on the Proposal for the Revision of the RBB for 2024	June 19, 2024
		6) Review and Recommendations on the Proposal for Loan Write-Off	June 19, 2024
		7) Review and Recommendations on the Proposal for the Review of the General Policy on Internal Control Systems	June 25, 2024
		8) Review and Recommendations on the Proposal for Loan Write-Off	June 26, 2024
		9) Review and Recommendations on the Board of Directors' Report	August 13, 2024
		10) Review and Recommendations on the Proposal for Loan Write-Off	September 26, 2024
		11) Review and Recommendations on the Proposal for Loan Write-Off	September 26, 2024
		12) Review and Recommendations on the Board of Directors' Report	September 27, 2024

No.	Main Tasks	Implementation Details	Implementation Date
		13) Review and Recommendations on the Proposal for Loan Write-Off	November 5, 2024
		14) Review and Recommendations on the Proposal for Loan Write-Off	December 3, 2024
		15) Review and Recommendations on the Proposal for Loan Write-Off	December 11, 2024
		16) Review and Recommendations on the Report of the Results of the Diagnostic of Internal Control Over Financial Reporting (ICOFR)	December 16, 2024
		17) Review and Recommendations on the Proposal for the Review of the General Policy on Internal Control Systems (KUSPI) and Guidelines for Internal Control Over Financial Reporting (ICOFR)	December 18, 2024
2.	Audit Committee Evaluation	1) Evaluation of the Implementation of the Bank's Compliance Function and the Implementation of Anti-Fraud Strategies for the Fourth Quarter of 2023	February 6, 2024
		2) Evaluation of the Implementation of the Bank's Compliance Function for the First Quarter of 2024	July 9, 2024

Implementation of Audit Committee Working Relationship with Pension Fund Financial Institution (DPLK)

No.	Main Tasks	Implementation Details	Implementation Date
1.	Audit Committee Advice and Counsel	1) Review and Recommendations on the Implementation of BNI's DPLK Governance for 2023	April 24, 2024
		2) Review and Recommendations on the Realization of BNI's DPLK Business Plan for the First Semester of 2024	July 25, 2024
		3) Review and Recommendations on the APU, PPT, and PPPSPM Reports of BNI's DPLK for the Second Quarter of 2024	July 25, 2024

Internal Audit Committee

No.	Main Tasks	Implementation Details	Implementation Date
1.	Audit Committee RKA	1) Evaluation and Standardization of the Audit Committee's Review Results Presentation	January 9, 2024
		2) Preparation for the Audit Committee's Evaluation of Commercial Segment Loans	January 30, 2024
		3) Discussion of the Audit Committee Review Results	February 13, 2024
		4) Discussion of the Audit Committee Review Results	February 20, 2024
		5) Discussion of the Audit Committee Review Results	April 23, 2024
		6) Discussion of the Audit Committee Review Results	May 17, 2024
		7) Discussion on the Updating of the Audit Committee Charter	June 4, 2024
		8) Discussion of the Audit Committee Review Results	June 19, 2024
		9) Discussion of the Audit Committee Review Results	June 25, 2024
		10) Discussion of the Audit Committee Review Results	August 13, 2024
		11) Discussion of the Audit Committee Review Results	September 10, 2024
		12) Discussion of the Audit Committee Review Results	September 24, 2024
		13) Discussion of the Audit Committee Review Results	November 5, 2024
		14) Discussion of the Audit Committee Review Results	November 19, 2024
		15) Discussion of the Audit Committee Review Results	December 10, 2024

In accordance with the suggestions and advice submitted at Committee meetings throughout 2024, the Audit Committee has also held discussions with related parties regarding the following matters:

1) Management

The Audit Committee reviews audited and unaudited financial statements published in 2024 to ensure that the content and disclosure of information are in accordance with accounting standards and applicable statutory provisions. Evaluation of the effectiveness of audit implementation by external auditors, independence, objectivity, and the adequacy of the scope of the audit is also carried out by the Audit Committee through discussions with Management. The Audit Committee also discusses and monitors the follow-up to the completion of audit findings, both internal audits and external audits, monitors the follow-up to the resolution of cases that occur in order to encourage accelerated resolution, and takes necessary administrative sanctions. In addition, the Audit Committee reviews and provides recommendations to the Board of Commissioners on proposals from Management that require approval or consultation with the Board of Commissioners.

2) External Auditor
   a. Public Accounting Firm (KAP) Implementing Audit Services for BNI Consolidated Financial Statements and Other Reports for Financial Year 2024.
      With regard to the series of audit processes for the BNI Consolidated Financial Statement and Other Reports for the 2024 Financial Year by the Public Accounting Firm (KAP), the Audit Committee conveyed its concerns, suggestions and advice through holding a joint Committee Meeting with the Board of Directors and KAP, with discussions regarding the audit plan (including sampling, scope, model/methodology, use of Technology and AI, as well as the composition of the audit team) in the Audit Kick Off Meeting Agenda for the Audit of the BNI Consolidated Financial Statement and Other Reports for the 2024 Financial Year; Monitoring Progress on the implementation of the KAP Audit including findings that require further adjustments and/or confirmation; and Audit Clearance Meeting, presentation of all KAP audit results after the 2024 Financial Statement audit process has been completed.

   b. Implementing Consultant for the Review of BNI's Internal Audit Function in 2024.
      The Audit Committee carries out its duties in evaluating BNI's Internal Audit Function, namely attending interview invitations from Independent Consultants, which is a series of review processes to obtain views from the Audit Committee regarding conditions that need to be improved in BNI's Internal Audit Function. Apart from that, holding a meeting with the Consultant Implementing the Review of BNI's Internal Audit Function to discuss the results of the Independent Consultant's review of BNI's Internal Audit Function in accordance with applicable laws and regulations and best practice. The Audit Committee provides constructive suggestions and advice to improve the effectiveness of BNI's Internal Audit Function, which is also in line with the results of the Independent Consultant's review.

   c. Implementing Consultant for Diagnostic Internal Control Over Financial Reporting (ICOFR) in 2024.
      In order to comply with applicable laws and regulations and follow up on Shareholder Aspirations, BNI, which is included in Systemic A SOE, is required to carry out an Internal Control Over Financial Reporting (ICOFR) Diagnostic carried out together with an Independent Consultant, which aims to improve the quality of internal control over financial reporting.

      The role of the Audit Committee in implementing the ICOFR Diagnostics includes participating in a series of processes carried out by the Independent Consultant, namely attending interview invitations to convey the duties and functions of the Audit Committee that have been carried out, especially in terms of reviewing the integrity of financial statements. Apart from that, the Audit Committee also reviews the results of the ICOFR Diagnostics and the proposed ICOFR Guidelines, which then become the Audit Committee's Recommendations to the Board of Commissioners, which are submitted at the Board of Commissioners Meeting forum.

   d. Others
      In addition, the Audit Committee is also active in attending Audit Exit Meeting invitations from the Financial Services Authority and the Financial Audit Agency.

   e. Monitoring
      In order to carry out the monitoring function of audit results by Regulators and external auditors (OJK, BPK, BI, KAP, etc.), the Audit Committee has carried out an evaluation of the follow-up actions carried out by Management. Review and evaluation of the results of the Regulator and external auditors for the period up to the end of 2024 are as follows:
      1) Progress in completing the Bank Indonesia (BI) audit results was 97.69% with 3 pending commitments out of a total of 130 commitments;
      2) Progress in completing the Financial Services Authority (OJK) audit results is 100%;
      3) Progress in completing audit results from the Supreme Audit Agency (BPK) was 73.23% with a total of 121 recommendations pending out of a total of 452 recommendations;
      4) Progress in completing the Management Letter for KAP Rintis, Jumadi, Rianto, and Partner (member firm of the PricewaterhouseCoopers network) is 100%.

      In order to comply with applicable laws and regulations, both POJK and Minister of SOE Regulations, the Audit Committee

has prepared a Report on the Results of the Audit Committee's Evaluation of the Implementation of Audit Services for Annual Historical Financial Information for the 2023 Financial Year period by KAP Tanudiredja, Wibisana, Rintis, and Partner (a member firm of the PricewaterhouseCoopers network), which was submitted to the Ministry of SOE in May 2024 and to the OJK in June 2024.

3) Internal Audit

The Audit Committee reviews the annual internal audit plan, monitors the implementation and audit results from BNI Internal Audit (IAD), and follows up to its completion by Management. The Audit Committee also holds discussions with Internal Audit in an effort to encourage effectiveness and strengthen the Internal Audit function.

Based on the 2024 Internal Audit Annual Work Plan and Budget (RKAT), the realization of the planned activities carried out by Internal Audit is as follows:

No.	Activity	Plan	Realization
1.	Audit Delivery Channel	64	67
2.	Overseas Office Audit	6	6
3.	Mandatory Audit	29	27
4.	Division Audit	0	1
5.	Subsidiaries Audit	1	3
6.	Thematic Audit/IT Activity incl. IT Application and Non-IT	57	76
7.	Independent Review	4	7
8.	Consultation	0	7
9.	Surprise	2	2
10.	Deepening (Non RKAT)	23	23
	Total	**186**	**219**

The realization of Internal Audit activities reached 120.25% of the planned target based on the 2024 Annual Work and Budget Plan (RKAT).

Based on the review and evaluation of Internal Audit follow-ups until the end of 2024, the progress of follow-up completion on IAD audit findings has reached 99.05%. There are still 1,353 follow-ups in the process of completion, consisting of 1,213 pending follow-ups from 2024, 111 pending follow-ups from 2023, and 29 pending follow-ups from 2022.

From the review and evaluation of the Whistleblowing System (WBS) reports, a total of 289 reports were submitted through WBS channels in 2024, with an additional 7 reports submitted outside of WBS channels. Among the total 296 reports, 51 were substantiated, 196 were unproven or lacked sufficient evidence, and 49 were still under investigation. Of the 51 substantiated reports, the violations included unethical behavior (21 reports), regulatory/legal violations (8 reports), and fraud (3 reports).

In an effort to optimize its role, in general the Audit Committee provides suggestions and advice to Management and IAD, including: Conducting a comprehensive exercise on credit documents, so that follow-up on credit document improvements is not limited to audit sampling only, but all credit documents will become compliant documents; Settlement of follow-up on findings from external auditors and/or regulators to be accelerated; Reporting facilities through WBS to ensure that all employees understand the function of reporting facilities through WBS; Prioritizing the function of IAD as a Strategic Business Partner so that audit results can be used as lessons learned to improve business quality and processes; Audit results to be used as an alert for Management regarding conditions that need attention and are used for decision making for Management.

4) Compliance Director

Based on the Audit Committee's review of compliance reports related to banking regulations and other applicable laws, the findings are presented in the Compliance Director's Task

Implementation Report. Throughout 2024, the company has consistently submitted these reports to the Financial Services Authority (OJK) in accordance with OJK Regulation No. 46/POJK.03/2017 on the Implementation of the Compliance Function in Commercial Banks. Additionally, the Audit Committee has reviewed and discussed the Compliance Division's work plan, the progress of employee case resolutions, and the implementation of the Anti-Fraud Strategy Program.

The discussion on the Compliance Division's work plan aims to enhance synergy between the Compliance, Anti-Fraud, and Internal Audit divisions in performing supervisory functions, particularly ensuring the company's compliance with applicable regulations.

Based on the examination and evaluation of employee case resolutions in 2024, there were 147 cases, of which 123 cases have been resolved, while 24 cases remain in process.

For resolved cases, employees found guilty of violations and/or fraud were subjected to administrative sanctions, including: termination of employment for 74 employees, demotion for 21 employees, written warnings for 34 employees, formal warnings for 72 employees, and coaching letters for 130 employees.

The implementation of the Anti-Fraud Strategy for Semester II of 2024 was reported to the OJK in January 2025, and the Implementation of the Anti-Fraud Strategy for Semester I of 2024 was reported to the OJK in July 2024. In 2024, the number of internal frauds that occurred was 61 incidents (2 of which were significant frauds that were reported incidentally to the OJK), while the number of external frauds that occurred was 26 incidents.

5) Board of Commissioners
The Audit Committee's duties, responsibilities, and recommendations are periodically reported to the Board of Commissioners, with key highlights including:
   a) Reviewing the proposal for the appointment of the Public Accounting Firm (KAP) for 2024, with a recommendation to the Board of Commissioners to appoint KAP Tanudiredja, Wibisana, Rintis & Partners (a member of the PricewaterhouseCoopers network), which has been renamed KAP Rintis, Jumadi, Rianto & Partners (also a PricewaterhouseCoopers network member), to audit the Consolidated Financial Statements and other reports as of December 31, 2024, as well as evaluating the effectiveness of the 2023 audit services (including independence and objectivity aspects);
   b) Reviewing the Bank's published financial statements;
   c) Assessing the effectiveness of the Internal Audit function concerning the realization of RKAT, audit findings and recommendations, compliance with Internal Control, risk management processes, and corporate governance (GCG) implementation;
   d) Evaluating the effectiveness of follow-ups on Internal and External Auditor findings and recommendations;
   e) Reviewing the company's monthly performance reports, proposed revisions to the 2024 RBB/RKAP, and proposed RBB/RKAP for 2025–2028 and RAKB for 2025 submitted by Management;
   f) Reviewing and providing input on the proposal for credit write-offs within a range of IDR 100 billion to IDR 200 billion;
   g) Examining management proposals requiring approval from the Board of Commissioners; and
   h) Formulating key recommendations and advice from the Audit Committee meetings and recommending that the Board of Commissioners communicate these recommendations to Management for follow-up actions.

Audit Committee Statement on the Adequacy of Internal Control and Risk Management Systems

The Audit Committee assesses that the internal control and risk management systems implemented within BNI's internal environment are effective, adequate, and capable of managing risks and business opportunities to support the Bank's business objectives without compromising financial performance, compliance, or reputation. The Bank's internal control and risk management systems provide tools to anticipate and manage risks by considering changes in risk profiles due to shifts in business strategy, external factors, and regulatory requirements. This is reflected in the effectiveness of internal control and risk management functions, including internal audit, compliance, financial, and operational controls.

Audit Committee Work Plan for 2025

The Audit Committee has established a work plan for 2025, which will be carried out through Committee Meetings, Reviews, and Reports to the Board of Commissioners, with the following strategic priorities:

1. Reviewing financial information to be disclosed to the public and/or regulatory authorities (Quarterly);
2. Reviewing financial information (Monthly);
3. Reviewing the procurement of KAP and recommending the appointment of a KAP for the 2025 financial year audit to the Board of Commissioners;
4. Evaluating the general audit services provided by KAP for the 2024 Consolidated Financial Statements and other reports;
5. Reviewing internal and external audit examinations and overseeing management's follow-up actions on audit findings;
6. Reviewing and recommending the Annual Audit and Consultation Plan to the Board of Commissioners;
7. Assessing compliance with laws and regulations related to the company's activities;
8. Recommending a rating agency appointment to evaluate the company's financial health;
9. Monitoring the implementation of Internal Control Over Financial Reporting (ICOFR);
10. Reviewing the implementation of Good Corporate Governance (GCG);
11. Reviewing and updating corporate policies requiring Board of Commissioners' approval;
12. Reviewing and updating the Audit Committee Charter;
13. Following up on directives from the Board of Commissioners regarding reports/letters submitted to them.

Audit Committee Member Remuneration

[ACGS C.3.4]

The remuneration policy for committee members from the Board of Commissioners is integrated with their honorarium, with no special remuneration allocated for each committee member. Meanwhile, the remuneration for independent (non-Commissioner) committee members is determined by the Board of Commissioners, with a maximum limit of 20% of the President Director's salary and no additional income beyond this honorarium. This policy aligns with the provisions of Minister of SOEs Regulation No. PER-3/MBU/03/2023 dated March 20, 2023, regarding the Organization and Human Resources of State-Owned Enterprises.

The Nomination and Remuneration Committee [ACGS D.2.8, D.2.13]

The establishment of the Nomination and Remuneration Committee aims to assist the Board of Commissioners in carrying out its duties and responsibilities related to providing recommendations on the nomination and remuneration process for members of the Board of Commissioners, the Board of Directors, committee members at the Board of Commissioners level, and the Bank's employees as a whole. It also ensures that the implementation aligns with applicable laws and regulations as well as good corporate governance (GCG) principles. Additionally, the committee is responsible for reviewing and evaluating the Bank's talent management system and policies, as well as assessing organizational development proposals submitted by the Board of Directors.

Legal Basis for the Establishment of the Nomination and Remuneration Committee

The Nomination and Remuneration Committee of BNI is established based on the following regulations:

1) Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, on Governance Implementation for Commercial Banks;
2) Financial Services Authority Regulation No. 34/POJK.04/2014, dated December 8, 2014, on the Nomination and Remuneration Committee for Issuers or Public Companies;
3) Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023, dated March 20, 2023, on the Organs and Human Resources of State-Owned Enterprises;
4) Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023, dated March 3, 2023, on Governance Guidelines and Significant Corporate Activities of State-Owned Enterprises; and
5) Board of Commissioners Decree No. Kep/01/DK/2002, dated December 2, 2002, on the Establishment of the Nomination and Remuneration Committee.

The Nomination and Remuneration Committee Charter [ACGS D.2.11, D.2.16]

The Nomination and Remuneration Committee operates under a written Charter that clearly outlines its membership, structure, authority, duties and responsibilities, meetings, activities, and work procedures. The BNI Nomination and Remuneration Committee Charter was established through the Board of Commissioners' Decree of PT Bank Negara Indonesia (Persero) Tbk. No. KEP/019/DK/2024, dated June 6, 2024. The contents of the BNI Nomination and Remuneration Committee Charter have been aligned with Financial Services Authority

Regulation No. 34/POJK.04/2014 on the Nomination and Remuneration Committee for Issuers or Public Companies.

In general, the Nomination and Remuneration Committee Charter covers:
1. Legal foundation;
2. Organizational structure and membership of the Nomination and Remuneration Committee;
3. Membership requirements for the Nomination and Remuneration Committee;
4. Responsibilities of the Nomination and Remuneration Committee;
5. Duties of the Nomination and Remuneration Committee;
6. Authority, rights, and obligations of the Nomination and Remuneration Committee;
7. Meetings of the Nomination and Remuneration Committee; and
8. Term of office for members of the Nomination and Remuneration Committee.

The Nomination and Remuneration Committee Charter is periodically reviewed and may be updated for improvements when necessary while considering the Bank's needs and complying with applicable regulations. The latest update to the Nomination and Remuneration Committee Charter was made on June 6, 2024, and has been uploaded to BNI's website at https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Komite-Nominasi-dan-Remunerasi-2024.pdf.

Duties and Responsibilities of the Nomination and Remuneration Committee

The following is a description of the duties and responsibilities of the Nomination and Remuneration Committee related to providing recommendations to the Board of Commissioners in relation to the Bank's nomination and remuneration process:

A. Related to the nomination function:
   1) Provide recommendations to the Board of Commissioners regarding:
      a. Composition of positions of members of the Board of Directors and/or members of the Board of Commissioners;
      b. Policies and criteria required in the Nomination process; and
      c. Performance evaluation policies for members of the Board of Directors and/or members of the Board of Commissioners.
   2) Assist the Board of Commissioners in assessing the performance of members of the Board of Directors and/or members of the Board of Commissioners based on benchmarks that have been prepared as evaluation materials;
   3) Provide recommendations to the Board of Commissioners regarding the program for developing the capabilities of members of the Board of Directors and/or members of the Board of Commissioners;
   4) Conduct evaluations of candidates for BUMN representatives who will be proposed as members of the Board of Directors or members of the Board of Commissioners of Subsidiaries, before being submitted to the GMS/Minister;
   5) Prepare and provide recommendations to the Board of Commissioners regarding the system and procedures for selecting and/or replacing members of the Board of Commissioners and the Board of Directors to the Board of Commissioners to be submitted to the General Meeting of Shareholders;
   6) Prepare and provide recommendations to the Board of Commissioners regarding the management process and implementation of talent development for the needs of BUMN executives (Board of Directors and BOD-1).
   7) Provide recommendations to the Board of Commissioners regarding Independent Parties who will become members of the Audit Committee and Risk Monitoring Committee.

B. Regarding the Remuneration function:
   1) Conducting evaluations of the remuneration system/policy based on performance, risk, fairness with peer groups, targets, and long-term strategies of the Bank, fulfillment of reserves as stipulated in laws and regulations and the Bank's potential income in the future.
   2) Preparing and providing recommendations to the Board of Commissioners regarding:
      a. Remuneration structure;
      b. Remuneration policy; and
      c. Amount of remuneration;

      The structure, policy and amount of remuneration for the Board of Commissioners and Board of Directors mentioned above are evaluated by the Nomination and Remuneration Committee at least once a year.
   3) Delivering evaluation results and providing recommendations to the Board of Commissioners regarding:
      a. Remuneration policy for the Board of Directors and Board of Commissioners to be submitted to the General Meeting of Shareholders.
      b. Remuneration policy for executive officers and employees as a whole to be submitted to the Board of Directors.
   4) Ensuring that the remuneration policy is in accordance with applicable provisions.
   5) Conducting periodic evaluations of the implementation of the remuneration policy.
   6) Assisting the Board of Commissioners in assessing performance with the appropriateness of the remuneration received by each member of the Board of Directors and/or member of the Board of Commissioners.

C. Related to the Talent Management function:
   1) Conducting evaluations of the Talent Classification system and procedures carried out by the Board of Directors;
   2) Conducting periodic reviews of the company's Talent Management System and monitoring and evaluating its implementation;
   3) Validate and calibrate the Talents proposed by the Board of Directors to the Board of Commissioners/Supervisory Board (Selected Talent), to produce a list of Talents to be nominated by the Board of Commissioners/ Supervisory Board to the GMS/Minister (Nominated Talent).

D. In appointing the President Commissioner, the Nomination and Remuneration Committee prepares a description of the job specifications, including time commitment requirements that also consider the need for time commitment during a crisis. The existence of other significant commitments outside the corporation must be disclosed to the board of commissioners prior to appointment and disclosed in the annual report. Changes in commitments must be immediately reported to the board of commissioners and their impact explained in the next annual report.

E. In appointing Commissioners Members, the Nomination and Remuneration Committee determines the terms and conditions for appointing Commissioners Members. These terms and conditions are available for review. The expected time commitment is stated in the Letter of Appointment of Commissioners Members and Commissioners Members must have sufficient time to fulfill the expected time commitment. The existence of other significant commitments outside BNI must be disclosed to the Board of Commissioners prior to appointment, along with an indication of the time commitment required and the Board of Commissioners must be notified if there are changes to such commitments.

F. Develop guidelines to ensure that all members of the Board of Commissioners allocate sufficient time to the Bank to be able to carry out their responsibilities effectively. The guidelines include among others:
   1) The President Commissioner is committed to providing sufficient time and also considering the need for time commitments during times of crisis. Other significant commitments outside the Bank must be disclosed to the Board of Commissioners prior to appointment and disclosed in the annual report. Changes in commitments must be immediately reported to the Board of Commissioners and their impact explained in the next annual report.
   2) Members of the Board of Commissioners are committed to providing the expected time. Other significant commitments outside the Bank must be disclosed to the Board of Commissioners prior to appointment, along with an indication of the time commitment required and the Board of Commissioners must be notified if there are changes to such commitments.

G. Carrying out other tasks assigned by the Board of Commissioners related to the nomination and remuneration function.

H. The procedure for carrying out the duties and functions of the Nomination and Remuneration Committee is carried out based on the Financial Services Authority Regulation governing the Nomination and Remuneration Committee of Commercial Banks, the Financial Services Authority Regulation governing the Nomination and Remuneration Committee of Issuers or public companies and the Financial Services Authority Regulation governing the implementation of governance in providing remuneration for commercial banks, which are applicable.

Authority, Rights, and Obligations of the Nomination and Remuneration Committee

In carrying out its duties, the Nomination and Remuneration Committee has the following authorities:

1. Accessing records or information about employees, funds, assets, and other resources belonging to BNI related to the implementation of its duties. The Nomination and Remuneration Committee is required to report in writing the results of the assignment to the Board of Commissioners.
2. Can cooperate with the Human Resources Division, Development and Learning Division, Budgeting and Financial Management Division, and other related Divisions.
3. In carrying out its duties, the Nomination and Remuneration Committee has the authority to recommend proposals for independent consultants from the Board of Directors to be appointed by the Board of Commissioners in order to support the functions and duties of the Nomination and Remuneration Committee, which include compiling a study of remuneration proposals based on benchmark data, by considering and being responsible for the selection and requirements of its assignment, as well as disclosing the identity and costs of consulting services.
4. Must carry out its duties properly and maintain the confidentiality of all documents, data and information of the Company, both from internal and external parties and only used for the benefit of carrying out the duties of the Committee.

5. In carrying out its duties and responsibilities related to the remuneration policy, the Nomination and Remuneration Committee must pay attention to at least:
   a) Financial performance and fulfillment of reserves as stipulated in applicable laws.
   b) Individual work performance.
   c) Fairness with peer groups, and
   d) Consideration of the Bank's long-term goals and strategies.
6. Before the current fiscal year, the Nomination and Remuneration Committee must prepare and submit an Annual Work Plan and Budget to the Board of Commissioners for determination, a copy of which is submitted by the Board of Commissioners to the Board of Directors for their information. The implementation of the Nomination and Remuneration Committee's Annual Work Plan and Budget is reported to the Board of Commissioners.
7. The Nomination and Remuneration Committee is required to prepare and submit a report on the implementation of its duties, responsibilities and nomination and remuneration procedures to the Board of Commissioners.

Policy on Appointment, Dismissal, and Term of Office of the Nomination and Remuneration Committee Members

The tenure of a Nomination and Remuneration Committee member who is also a member of the Board of Commissioners automatically ends when their term as a Commissioner expires. If a Commissioner serving as a member of the Nomination and Remuneration Committee resigns before completing their term, they may be replaced by another Commissioner. If the Commissioner serving as the Chair of the Nomination and Remuneration Committee steps down from their role as a Commissioner, the Chair position must be reassigned to another Independent Commissioner within no later than 30 days.

Meanwhile, the replacement of a Nomination and Remuneration Committee member who is not from the Bank's Board of Commissioners must be completed within a maximum of 60 days after the respective member is no longer able to perform their duties. The term of office for independent members of the Nomination and Remuneration Committee is a maximum of three years and can be extended once for an additional two years, resulting in a total tenure of up to five years. However, the Board of Commissioners retains the right to dismiss any Committee member at any time.

Structure, Membership, and Expertise of the Nomination and Remuneration Committee Members

The composition of the Nomination and Remuneration Committee within BNI, as stated in the Committee Charter, is as follows:

1) The Nomination and Remuneration Committee is established by the Board of Commissioners. The Board may form the Committee as a separate entity.
2) The Committee must act independently and report directly to the Board of Commissioners.
3) The appointment of Committee members is carried out by the Board of Directors based on a Board of Commissioners' resolution.
4) The Nomination and Remuneration Committee consists of at least 3 (three) members, namely 1 (one) Independent Commissioner who also serves as Chair, 1 (one) Commissioner and 1 (one) executive officer who oversees the human resources function or a party who holds a managerial position under the Board of Directors who oversees human resources at BNI.
5) Other members of the Nomination and Remuneration Committee other than the minimum members as stated in point 4) above may come from other members of the Board of Commissioners and parties from outside BNI.
6) If the Nomination and Remuneration Committee members are determined to consist of more than 3 (three) person, then the committee members who are Independent Commissioners must number at least 2 (two) person.
7) The majority of additional Committee members, as referred to in point (5), must not be managerial-level officers below the Board of Directors responsible for human resources.
8) The Chair of the Nomination and Remuneration Committee must be an Independent Commissioner at BNI.
9) The Chairperson of the Nomination and Remuneration Committee is prohibited from holding concurrent positions as chair of more than 1 (one) committee in another committee and may only hold concurrent positions as Chairperson of a Committee in a maximum of 1 (one) other committee at BNI.
10) Committee members must not be members of the Board of Directors, either at BNI or at any other bank.
11) If deemed necessary, the Committee may appoint a Committee Secretary, whose assignment, rights, authority, and responsibilities are determined by the Committee Chair.

Number, Structure, and Composition of Membership of the Nomination and Remuneration Committee

In 2024, the BNI Nomination and Remuneration Committee consists of 13 (thirteen) people appointed based on the Decree of the Board of Commissioners. Of this number, 6 (six) people are Independent Commissioners, one of whom serves as Chairman, 5 (five) Commissioners, 1 (one) person as a party holding a managerial position under the Board of Directors in charge of human resources at BNI, and 1 (one) other person is an Independent Party from outside the Bank. [ACGS D.2.10, D.2.15]

The composition of the membership of the Nomination and Remuneration Committee as of December 31, 2024 is filled by Independent Commissioners, Non-Independent Commissioners, Members from Independent Parties, and executive officers in charge of human resources functions. The composition of the chairman and members of the Bank's Nomination and Remuneration Committee has reflected that the majority of the membership remains filled by independent parties. [ACGS D.2.9, D.2.14, (B).D.2.1]

The Bank ensures that the structure and composition of the Nomination and Remuneration Committee currently in office have met the provisions set out in the Nomination and Remuneration Committee Charter.

The following is the composition of the members of the BNI Nomination and Remuneration Committee throughout 2024:

January 1, 2024– March 4, 2024 Period

Name	Position	Term of Office	Position in the Bank
Pradjoto	Chairman [ACGS D.2.10, D.2.15]	September 21, 2023-present	President Commissioner/ Independent Commissioner
Pahala Nugraha Mansury	Member	October 30, 2023-present	Vice President Commissioner
Sigit Widyawan	Member	July 20, 2020-present	Independent Commissioner
Askolani	Member	January 30, 2020-present	Commissioner
Asmawi Syam	Member	July 20, 2020-present	Independent Commissioner
Susyanto[1)]	Member	September 8, 2020-March 4, 2024	Commissioner
Iman Sugema	Member	August 27, 2020-present	Independent Commissioner
Septian Hario Seto	Member	August 27, 2020-present	Independent Commissioner
Erwin Rijanto Slamet	Member	August 16, 2021-current	Independent Commissioner
Fadlansyah Lubis	Member	December 29, 2022-current	Commissioner
Robertus Billitea	Member	September 21, 2023-present	Commissioner
Danni Tri Suryani	Independent Member	August 10, 2020-present	-
Yenni Sari Dewi	Member	May 26, 2023-present	Human Capital Strategy Division Head

[1)] Resigned from the position of Commissioner as of March 4, 2024

March 4, 2024– December 31, 2024 Period

Name	Position	Term of Office	Position in the Bank
Pradjoto	Chairman [ACGS D.2.10, D.2.15]	September 21, 2023-present	President Commissioner/ Independent Commissioner
Pahala Nugraha Mansury	Member	October 30, 2023-present	Vice President Commissioner
Sigit Widyawan	Member	July 20, 2020-present	Independent Commissioner
Askolani	Member	January 30, 2020-present	Commissioner
Asmawi Syam	Member	July 20, 2020-present	Independent Commissioner
Iman Sugema	Member	August 27, 2020-present	Commissioner
Septian Hario Seto	Member	August 27, 2020-present	Independent Commissioner
Erwin Rijanto Slamet	Member	August 16, 2021-current	Independent Commissioner
Fadlansyah Lubis	Member	December 29, 2022-current	Independent Commissioner
Robertus Billitea	Member	September 21, 2023-present	Commissioner
Mohamad Yusuf Permana[1)]	Member	October 22, 2024-present	Commissioner
Danni Tri Suryani	Independent Member	August 10, 2023-present	-
Yenni Sari Dewi	Member	May 26, 2023-present	Human Capital Strategy Division Head

[1)] Served as Commissioner since March 4, 2024, and effective based on OJK approval as of September 2, 2024.

Nomination and Remuneration Committee Profile

Chairman of the Nomination and Remuneration Committee

Pradjoto	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/013/DK/2023 dated September 21, 2023
Term of Office	September 21, 2023 - September 20, 2028
Professional Certication	- Certification of Competence in Banking Risk Management, Qualification 6 - Certified Governance Oversight Professional (CGOP)
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Member of the Nomination and Remuneration Committee as Board of Commissioner

Pahala Nugraha Mansury	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/018/DK/2023 dated October 30, 2023
Term of Office	October 30, 2023-October 29, 2028
Professional Certication	- Risk Management Certification Level JK 7 - Alignment of Risk Management Certification Level JK 7 - Governance, Risk & Compliance (GRC) Certification
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Sigit Widyawan	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/026/DK/2020 dated July 20, 2020
Term of Office	July 20, 2020 - July 19, 2025
Professional Certication	- Risk Management Certification Level JK 6 - Alignment of Risk Management Certification Level JK 6 - Indonesia Internal Audit Practitioner (IIAP) Certification
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Askolani	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/001/DK/2020 dated January 30, 2020
Term of Office	January 30, 2020 - January 19, 2025
Professional Certication	- Alignment of Risk Management Certification Level JK 6 - Governance, Risk & Compliance (GRC) Certification
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Asmawi Syam	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/029/DK/2020 dated July 20, 2020
Term of Office	July 20, 2020 - July 19, 2025
Professional Certication	- Risk Management Certification Level JK 7 - Alignment of Risk Management Certification Level JK 7 - Indonesia Internal Audit Practitioner (IIAP) Certification - Governance, Risk & Compliance (GRC) Certification
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Iman Sugema	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/037/DK/2020 dated August 27, 2020
Term of Office	August 27, 2020 - August 26, 2025
Professional Certication	- Risk Management Certification Level JK 6 - Alignment of Risk Management Certification Level JK 6
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Septian Hario Seto	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/036/DK/2020 dated August 27, 2020
Term of Office	August 27, 2020 - August 26, 2025
Professional Certication	- Risk Management Certification Level JK 6 - Alignment of Risk Management Certification Level JK 6
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Erwin Rijanto Slamet	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/014/DK/2021 dated August 16 2021
Term of Office	August 16, 2021 - August 15, 2026
Professional Certication	- Alignment of Risk Management Certification Level JK 6 - Governance, Risk & Compliance (GRC) Certification
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Fadlansyah Lubis	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/022/DK/2022 dated December 29 2022
Term of Office	December 29, 2022 - December 28, 2027
Professional Certication	Alignment of Risk Management Certification Level JK 6
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Robertus Billitea	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/006/DK/2023 dated September 21, 2023
Term of Office	September 21, 2023 - September 20, 2028
Professional Certication	- Risk Management Certification Level JK 6 - Alignment of Risk Management Certification Level JK 6
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Mohamad Yusuf Permana	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/028/DK/2024 dated October 22, 2024
Term of Office	October 22, 2024 - October 21, 2029
Professional Certication	- Risk Management Certification Level JK 6 - Alignment of Risk Management Certification Level JK 6
Complete Profile	Profile can be found in the of the Board of Commissioners Profiles.

Member of the Nomination and Remuneration Committee from the Independent Party

Danni Tri Suryani

Independent Member of Nomination and Remuneration Comittee

Age
58 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Management Economics from Universitas Indonesia (1989)
- Master of Science Degree n Human Resources Development from the University of Stirling, Scotland, UK (2000)

Legal Basis of Appointment
Appointed for the first time as Member of the Nomination and Remuneration Committee in January 2018 based on Board of Commissioners Decree No. KEP/032/ DK/2020 dated August 10, 2020

Term of Office
- 2020-2023 (First Period)
- 2023-2025 (Second Period)

Professional Certification and/or Training
Level 3 Risk Management Certification

Work Experience
- Human Capital Head and Corporate Secretary at Mandiri Investment Management (2017-2020)
- Executive Vice President Human Capital at Bank Mutiara/ J Trust (2014-2015)
- Learning and Knowledge Management Group Head at PT Bank Niaga (Persero) Tbk (2006-2009)

Concurrent Position
No concurrent positions internally or externally

Yenni Sari Dewi
Anggota Komite Nominasi dan Remunerasi

Age
46 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Nutrition and Animal Feed from Universitas Gadjah Mada (2000)
- Master's Degree in General Business from Universitas Gadjah Mada (2003)

Legal Basis of Appointment
Appointed for the first time as Member of the Nomination and Remuneration Committee on May 26, 2023 based on Board of Commissioners Decree No. KEP/002/DK/2023 dated May 26, 2023

Term of Office
2023 - Present

Professional Certification and/or Training
1. Sharing Sessions: Talent Management & Productivity, William Wolf & McKinsey at the BoD Retreat, May 8-10, 2024.
2. CHRO Masterclass Vol 3, Women Leadership in the New of Work, BUMN School of Excellence, May 22, 2024.
3. SOE Srikandi Leadership Program (SSLP) Batch-1, BUMN School of Excellence & Srikandi BUMN, May – June 2024.
4. CHRO Masterclass Vol 4, Future Capabilities in the Sustainability Era, BUMN School of Excellence, August 5, 2024.
5. Risk Management Certification JK-6, LSPP, August 9, 2024.
6. Srikandi Leadership Series 1: Implementation of RWP and EWP in Efforts to Enhance Women's Leadership Engagement and Productivity in SOEs, Srikandi BUMN, October 4, 2024.
7. Onboarding HC Talent Sessions 1 & 2 (for Project Manager), Forum Human Capital Indonesia (FHCI), October 17 & 22, 2024.
8. Workshop Redefining Project Charter, Forum Human Capital Indonesia (FHCI) and Corporate Innovation Asia (CIAS), November 28, 2024.
9. Business Essential 3: Finance for Executives, BUMN School of Excellence x Emeritus x Columbia University Business School, October 3 – November 29, 2024.
10. Others: Online Training via LinkedIn Learning - AKHLAK Pathways (18 items), BNU Leadership Series & Mandatory Learning (UU PDP, SMAP)

Work Experience
- Head of Management & Organization Research Group– Strategic Planning Division (2015-2020),
- Dean of Leadership & Future Capability Academy – BNI Corporate University (2020-2021)
- Deputy Head of Strategy & Policy Division – Human Capital Strategy Division (2021-2023)
- Head of Human Capital Strategy Division at PT Bank Negara Indonesia (Persero), Tbk (2023 - present)

Concurrent Position
Head of Human Capital Strategy Division at PT Bank Negara Indonesia (Persero), Tbk

Qualifications, Education, and Work Experience of the Nomination and Remuneration Committee

The membership requirements for BNI's Nomination and Remuneration Committee are as follows:

1) Possess high integrity, adequate capability, knowledge, and work experience in the Committee's areas of responsibility, as well as an understanding of the banking sector.
2) Have no personal interests or affiliations that could create negative impacts or conflicts of interest with the company.
3) Be able to allocate sufficient time to fulfill their duties.
4) Demonstrate strong collaboration and effective communication skills.

In addition to meeting the above requirements, all independent members of the Nomination and Remuneration Committee must also fulfill the following criteria:

1) Have no affiliation, financial, managerial, ownership, or family relationships with members of the Board of Commissioners, the Board of Directors, and/or holders of BNI's Series A Dwiwarna shares, or any other relationships with BNI that may affect their ability to act independently. The definition of an independent party in this charter follows the applicable regulations governing independent committee members under the Board of Commissioners, particularly the Financial Services Authority (OJK) Circular Letter on Governance Implementation for Commercial Banks and the OJK Regulation on the Nomination and Remuneration Committee for Issuers or Public Companies.
2) Have relevant experience in nomination and/or remuneration.
3) Not be an employee of BNI.
4) Not hold concurrent positions as:
   a. A member of the Board of Commissioners/ Supervisory Board in a State-Owned Enterprise (SOE) or other company.
   b. A secretary or staff member of the Board of Commissioners/Supervisory Board in an SOE or other company.
   c. A member of any other committee within the company.
5) The executive officer overseeing human resources must have knowledge of remuneration and/or nomination systems and the bank's succession planning.
6) BNI must verify the accuracy of all documents or supporting data related to the independent status requirements, including a personal integrity statement from the independent party.

By adhering to both the general and specific requirements outlined in the Nomination and Remuneration Committee Charter, the Bank ensures that the current Chair and all members of the Committee meet the educational qualifications and work experience criteria, as detailed in the table below:

Educational Qualifications and Work Experience, and Fields of Expertise of the Audit Committee

Name	Position	Education	Work Experience	Areas of Expertise
Pradjoto	Chairman	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Law • Economics
Pahala Nugraha Mansury	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting • Finance
Sigit Widyawan	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Economic • Accounting • Finance
Askolani	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economics
Asmawi Syam	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economics
Iman Sugema	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Agribusiness • Economics
Septian Hario Seto	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting • Finance
Erwin Rijanto Slamet	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economics
Fadlansyah Lubis	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Law
Robertus Billitea	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Law
Mohamad Yusuf Permana	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economics
Danni Tri Suryani	Independent Member	• Bachelor's Degree in Management Economics from the University of Indonesia (1989) • Master of Science in Human Resources Development from the University of Stirling, Scotland, UK (2000)	Leader of Human Capital and Corporate Secretary at Mandiri Investment Management, Executive Vice President of Human Capital at Bank Mutiara/J Trust, Learning and Knowledge Management Group Head at PT CIMB Niaga Tbk.	• Management Economics • Organizational Management and Human Resources
Yenni Sari Dewi	Member	• Bachelor's Degree in Animal Nutrition and Feed from Gadjah Mada University (2000) • Master's Degree in General Business from Gadjah Mada University (2003)	Leader of the Management & Organization Research Group – Strategic Planning Division, Dean of the Academy of Leadership & Future Capabilities – BNI Corporate University, Deputy Head of the Strategy & Policy Division – Human Capital Strategy Division, Head of Human Capital Strategy Division at PT Bank Negara Indonesia (Persero) Tbk.	• Management Economics • Organizational Management and Human Resources

Independence Statement of the Nomination and Remuneration Committee

All members of the Bank's Nomination and Remuneration Committee meet the independence criteria, ensuring their ability to perform their duties professionally and independently. They uphold the Bank's interests and remain unaffected by any external influence that is not in accordance with applicable laws and regulations. This commitment is reinforced by the composition of the Nomination and Remuneration Committee, which consists predominantly of Independent Commissioners of the Bank.

The aspects of independence for the members of the Nomination and Remuneration Committee are detailed in the table below:

Nomination and Remuneration Committee Independency

Name	Independency Aspects				
	No financial relationships with the Board of Commissioners and the Board of Directors	No management relationships in BNI, subsidiaries or affiliated companies	No share ownership relationship in BNI	No familial relationships with the Board of Commissioners, the Board of Directors, and/or fellow members of the Nomination and Remuneration Committee	Not serving on the board of political party or government official
Pradjoto	✓	✓	✓	✓	✓
Pahala Nugraha Mansury	✓	✓	✓	✓	✓
Sigit Widyawan	✓	✓	✓	✓	✓
Askolani	✓	✓	✓	✓	✓
Asmawi Syam	✓	✓	✓	✓	✓
Iman Sugema	✓	✓	✓	✓	✓
Septian Hario Seto	✓	✓	✓	✓	✓
Erwin Rijanto Slamet	✓	✓	✓	✓	✓
Fadlansyah Lubis	✓	✓	✓	✓	✓
Robertus Billitea	✓	✓	✓	✓	✓
Mohamad Yusuf Permana	✓	✓	✓	✓	✓
Danni Tri Suryani	✓	✓	✓	✓	✓
Yenni Sari Dewi	✓	✓	✓	✓	✓

Concurrent Positions Information

As a form of transparency, information regarding the concurrent positions held by the members of the Nomination and Remuneration Committee is outlined in the table below:

Name	Position in the Bank	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Pradjoto	Chairman of the Nomination and Remuneration Committee & President Commissioner/ Independent Commissioner	None	None	None
Pahala Nugraha Mansury	Vice President Commissioner	None	None	None
Sigit Widyawan	Independent Commissioner	None	None	None
Askolani	Commissioner	None	None	None
Asmawi Syam	Independent Commissioner	None	None	None
Iman Sugema	Independent Commissioner	None	None	None
Septian Hario Seto	Independent Commissioner	None	None	None
Erwin Rijanto Slamet	Independent Commissioner	None	None	None
Fadlansyah Lubis	Commissioner	None	None	None
Robertus Billitea	Commissioner	None	None	None
Mohamad Yusuf Permana	Commissioner	None	None	None
Danni Tri Suryani	Independent Member	None	None	None
Yenni Sari Dewi	Human Capital Strategy Division Head	None	None	None

Nomination and Remuneration Committee Meetings [ACGS D.2.12, D.2.17]

Meeting Policy

The Nomination and Remuneration Committee Charter clearly outlines the policies and procedures for conducting meetings of BNI's Nomination and Remuneration Committee, as follows:

1) Meetings of the Nomination and Remuneration Committee are held as needed by the Bank, with a minimum of four meetings per year.
2) The Nomination and Remuneration Committee Meeting may only be held if attended by a majority of the members of the Nomination and Remuneration Committee and of the majority, one is the Chairperson of the Nomination and Remuneration Committee and 1 (one) Executive Officer in charge of Human Resources or a party holding a managerial position under the Board of Directors in charge of human resources.
3) Meetings are chaired by the Chairperson of the Nomination and Remuneration Committee. If the Chairperson is unable to attend, the meeting is led by the most senior committee member designated/agreed upon in the meeting.
4) Decision-making at the Nomination and Remuneration Committee meeting is based on consensus. In the event that consensus is not reached, decision-making is based on majority vote with the principle of 1 (one) person 1 (one) vote.
5) If in the decision-making process carried out by voting there are an equal number of votes, then the decision is taken based on the majority vote with the principle of 1 (one) person 1 (one) vote, without counting the votes of members who are Human Resources Executive Officers or parties who hold managerial positions under the Board of Directors who are in charge of human resources.
6) The results of the Nomination and Remuneration Committee meetings are recorded in minutes of the meeting, signed by all committee members, and properly documented.
7) Any dissenting opinions expressed in the meeting must be clearly recorded in the minutes, along with the reasons for the disagreement.
8) The minutes of the meeting, as referred to in point 6 above, are submitted in writing by the Nomination and Remuneration Committee to the Board of Commissioners.
9) The attendance of Nomination and Remuneration Committee members in meetings is reported in the committee's quarterly and annual reports.

Meeting Frequency and Attendance Rate of the Nomination and Remuneration Committee Members

In 2024, the Nomination and Remuneration Committee held 23 (twenty-three) meetings. The frequency of these meetings complies with the requirements set forth in the Nomination and Remuneration Committee Charter.

Below is the attendance record of the Committee members in the Nomination and Remuneration Committee meetings throughout 2024:

Name	Position	Number of Meetings [ACGS D.2.12, D.2.17]	Attended [ACGS D.2.12, D.2.17]	Percentage [ACGS D.2.12, D.2.17]
Pradjoto	Chairman of the Nomination and Remuneration Committee & President Commissioner/Independent Commissioner	23	23	100%
Pahala Nugraha Mansury	Vice President Commissioner	23	20	87%
Asmawi Syam	Independent Commissioner	23	23	100%
Sigit Widyawan	Independent Commissioner	23	23	100%
Iman Sugema	Independent Commissioner	23	23	100%
Septian Hario Seto	Independent Commissioner	23	21	91%
Erwin Rijanto Slamet	Independent Commissioner	23	23	100%
Askolani	Commissioner	23	21	91%
Susyanto*)	Commissioner	7	7	100%
Fadlansyah Lubis	Commissioner	23	23	100%
Robertus Billitea	Commissioner	23	22	96%
Mohamad Yusuf Permana**)	Commissioner	6	5	83%
Danni Tri Suryani	Independent Member	23	23	100%
Yenni Sari Dewi	Human Capital Strategy Division Head	9	9	100%

*) Resigned from the position of Commissioner as of March 4, 2024
**) Appointed as Commissioner since March 4, 2024, and effective based on OJK approval since September 2, 2024

Meeting Agenda

Throughout 2024, the Nomination and Remuneration Committee meetings discussed the following topics:

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invitee
1	February 13, 2024	• Talent Development Policy, related to the SOE Talent Pool • Board of Commissioners Development Program 2024 (including Risk Management Certification and Individual Development Program for the Board of Commissioners) • Policy & Procedure for Managing Outsourced Workforce	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani 13. Yenni Sari Dewi	Human Capital & Compliance Director
2	February 20, 2024	• Report on the Study by Independent Remuneration Consultant and Discussion on the Proposed Remuneration for the Board of Directors and Board of Commissioners for 2024 • Achievement of the Board of Directors' KPIs for 2023 • Target KPIs for the Board of Directors for 2024 (including the Collegial Board of Directors' KPIs for 2024)	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani 13. Yenni Sari Dewi	1. President Director 2. Finance Director 3. Human Capital & Compliance Director
3	February 21, 2024	Performance and Capacity Evaluation Interviews for the Board of Directors for 2023	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani	All directors
4	February 22, 2024	• Performance and Capacity Evaluation Interviews for the Board of Directors for 2023 (Continuation) • Discussion on the achievement of Long Term Incentives (LTI) performance targets and the implementation of long-term incentive allocations	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani	All directors
5	February 27, 2024	Validation Interviews for New Nominated Talents 2024	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani	All Nominated Talents 2024

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invitee
6	February 29, 2024	Discussion on Changes in the Management of Subsidiaries at BNI Sekuritas	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani 13. Yenni Sari Dewi	1. President Director 2. Finance Director 3. Human Capital & Compliance Director 4. Human Capital Business Partner
7	March 4, 2024	Discussion on the Proposal from Series A Dwiwarna Shareholders regarding Changes in the Company's Management for the Annual General Meeting of Shareholders for the 2023 Financial Year of PT Bank Negara Indonesia (Persero) Tbk	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Susyanto 10. Fadlansyah Lubis 11. Robertus Billitea 12. Danni Tri Suryani	Ministry of SOEs as Series A Dwiwarna Shareholder
8	March 14, 2024	Discussion on Changes in the Management of Subsidiaries at BNI Sekuritas	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Danni Tri Suryani	1. Human Capital & Compliance Director 2. Finance Director 3. Human Capital Business Partner
9	March 28, 2024	• Corporate Plan as a continuation of Corporate Transformation • Policy and Report on the Implementation of Sanctions	1. Pradjoto 2. Asmawi Syam 3. Sigit Widyawan 4. Iman Sugema 5. Septian Hario Seto 6. Erwin Rijanto Slamet 7. Askolani 8. Fadlansyah Lubis 9. Robertus Billitea 10. Danni Tri Suryani 11. Yenni Sari Dewi	1. Digital and Integrated Banking Director 2. Human Capital & Compliance Director 3. Corporate Development & Transformation Division
10	April 4, 2024	Discussion on Changes to the Proposed Remuneration for the Board of Directors and Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk based on the Study by Independent Remuneration Consultant	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Danni Tri Suryani	1. Finance Director 2. Direktur Human Capital & Compliance 3. Divisi Corporate Secretary
11	April 25, 2024	Discussion on the Appointment of Management for Subsidiaries at BNI Sekuritas, Hibank, and BNI Venture Capital	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Fadlansyah Lubis 9. Robertus Billitea 10. Danni Tri Suryani	1. Human Capital & Compliance Director 2. Finance Director 3. Human Capital Business Partner

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invitee
12	May 3, 2024	• Outsourcing Policy • Changes to Pension Fund Regulations	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Danni Tri Suryani 11. Yenni Sari Dewi	1. Human Capital & Compliance Director 2. Finance Director
13	16 May 2024 May 16, 2024	• Pembahasan Penataan Organisasi Direksi (Pembidangan Direksi) BNI • Pembahasan Usulan Perubahan Tunjangan dan Fasilitas anggota Direksi dan Dewan Komisaris • Discussion on the Organization Restructuring of the Board of Directors (Board Division) at BNI • Discussion on Proposed Changes to Allowances and Facilities for Members of the Board of Directors and Board of Commissioners	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Danni Tri Suryani 12. Yenni Sari Dewi	1. President Director 2. Vice President Director 3. Human Capital & Compliance Director 4. Digital and Integrated Banking Director 5. Corporate Secretary Division 6. Corporate Development & Transformation Division
14	May 30, 2024	Discussion on Employee Remuneration	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Danni Tri Suryani 12. Yenni Sari Dewi	1. Direktur Human Capital & Compliance 2. Human Capital & Compliance Director
15	June 13, 2024	Discussion on Changes in the Management of Subsidiaries at BNI Sekuritas, BNI Life, and BNI Finance	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Danni Tri Suryani	1. Human Capital & Compliance Director 2. Finance Director
16	July 18, 2024	Discussion on the proposed performance targets for the next 3 years related to Long Term Incentives (LTI) and governance of LTI	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Danni Tri Suryani	1. Finance Director 2. Human Capital & Compliance Director 3. Corporate Secretary Division
17	August 15, 2024	Discussion on Changes to the Proposed Collegial KPIs for the Board of Directors for 2024	1. Pradjoto 2. Asmawi Syam 3. Sigit Widyawan 4. Iman Sugema 5. Septian Hario Seto 6. Erwin Rijanto Slamet 7. Askolani 8. Fadlansyah Lubis 9. Robertus Billitea 10. Danni Tri Suryani	1. President Director 2. Vice President Director 3. Finance Director 4. Human Capital & Compliance Director

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invitee
18	September 26, 2024	Discussion on the Achievement of the Board of Directors' KPIs for the First Semester of 2024	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Erwin Rijanto Slamet 7. Askolani 8. Fadlansyah Lubis 9. Robertus Billitea 10. Danni Tri Suryani	1. President Director 2. Finance Director 3. Human Capital & Compliance Director 4. Corporate Planning & Performance Management Division
19	October 24, 2024	Performance and Capacity Evaluation Interviews for the Board of Directors for the First Semester of 2024	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana 12. Danni Tri Suryani	All Directors
20	October 25, 2024	Performance and Capacity Evaluation Interviews for the Board of Directors for the First Semester of 2024 (Continuation)	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana 12. Danni Tri Suryani	All Directors
21	November 7, 2024	Discussion on the evaluation of the implementation of internal talent development, employees, and the development program for the Board of Commissioners	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Erwin Rijanto Slamet 7. Fadlansyah Lubis 8. Robertus Billitea 9. Mohamad Yusuf Permana 10. Danni Tri Suryani 11. Yenni Sari Dewi	1. Human Capital & Compliance Director 2. SEVP of Human Capital
22	November 14, 2024	Discussion on Proposed Collegial KPIs for the Board of Directors for 2025	1. Pradjoto 2. Pahala Nugraha Mansury 3. Asmawi Syam 4. Sigit Widyawan 5. Iman Sugema 6. Septian Hario Seto 7. Erwin Rijanto Slamet 8. Askolani 9. Fadlansyah Lubis 10. Robertus Billitea 11. Mohamad Yusuf Permana 12. Danni Tri Suryani 13. Yenni Sari Dewi	All Directors
23	December 19, 2024	Discussion on the Establishment of the Bonus Budget	1. Pradjoto 2. Asmawi Syam 3. Sigit Widyawan 4. Iman Sugema 5. Septian Hario Seto 6. Erwin Rijanto Slamet 7. Askolani 8. Fadlansyah Lubis 9. Robertus Billitea 10. Mohamad Yusuf Permana 11. Danni Tri Suryani	1. Human Capital & Compliance Director 2. Finance Director

Competency Improvement Program for Nomination and Remuneration Committee Members in 2024

In 2024, members of the Nomination and Remuneration Committee participated in the following education or training:

Name of Training/Workshop/ Conference/seminar	Implementation Time	Organizer
Pradjoto - Chairman of the Audit Committee/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Pahala Nugraha Mansury – KNR Member/Vice President Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Sigit Widyawan – KNR Member/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Askolani - KNR Member/Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Asmawi Syam - KNR Member/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Iman Sugema - KNR Member/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Septian Hario Seto - KNR Member/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Erwin Rijanto Slamet - KNR Member/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Fadlansyah Lubis - KNR Member/Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Robertus Billitea - KNR Member/Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Mohamad Yusuf Permana - KNR Member/Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Danni Tri Suryani - KNR Member (Independent Party)		
Key Performance Indicators (KPI) for Collegial SOE Banking in 2024	March 27 - 28, 2024	Ministry of SOE
Yenni Sari Dewi - KNR Member/Head of Human Capital Strategy Division		
Sharing Sessions: Talent Management & Productivity, William Wolf & McKinsey at the BoD Retreat	May 8 - 10, 2024	PT Bank Negara Indonesia (Persero) Tbk.
CHRO Masterclass Vol 3, Women Leadership	May 22, 2024	BUMN School of Excellence
SOE Srikandi Leadership Program (SSLP) Batch-1	May - June 2024	BUMN School of Excellence dan Srikandi BUMN
CHRO Masterclass Vol 4, Future Capabilities in the Sustainability Era	August 5, 2024	BUMN School of Excellence
Risk Management Certification JK-6	August 9, 2024	Banking Professional Certification Institute (LSPP)
Srikandi Leadership Series 1: Implementation of RWP and EWP in Efforts to Enhance Women's Leadership Engagement and Productivity in SOEs	October 4, 2024	Srikandi BUMN

Name of Training/Workshop/ Conference/seminar	Implementation Time	Organizer
Onboarding HC Talent Sessions 1 & 2 (for Project Manager)	October 17 & 22, 2024	Forum Human Capital Indonesia (FHCI)
Workshop Redefining Project Charter	November 28, 2024	Forum Human Capital Indonesia (FHCI) and Corporate Innovation Asia (CIAS)
Business Essential 3: Finance for Executives	October 3 – November 29, 2024	BUMN School of Excellence, Emeritus, & Columbia University Business School

Work Program and Implementation of Duties of the Nomination and Remuneration Committee in 2024

In 2024, the Nomination and Remuneration Committee submitted a report on the implementation of its duties and responsibilities to the Board of Commissioners and provided several recommendations, including the following:

1. Talent Development Policy related to the BUMN Talent Pool
2. Outsourcing Workforce Management Policy & Procedures
3. Remuneration of the Board of Directors and Board of Commissioners in 2024
4. Target KPI of the Board of Directors in 2024 (including the KPI of the Collegial Board of Directors in 2024)
5. Proposal for Nominated Talent in 2024
6. Proposal for Subsidiary Management
7. Sanctions Policy
8. Changes to Pension Fund Regulations
9. Restructuring of the Board of Directors Organization (Directorate Division) of BNI
10. Changes to Allowances and Facilities for members of the Board of Directors and Board of Commissioners
11. Employee Remuneration
12. Proposed performance targets promised for the next 3 years related to Long Term Incentives (LTI) and discussion of governance LTI
13. Internal talent and employee development
14. Proposed KPI of the Board of Directors Collegiate in 2025

Evaluation of the Nomination and Remuneration Committee on the Implementation of the Nomination and Remuneration Policy at the Bank

In 2024, the Nomination and Remuneration Committee has conducted an evaluation and assessment that the nomination process implemented by the Bank has complied with applicable regulatory provisions and considered the principles of GCG. In terms of remuneration, the Nomination and Remuneration Committee is of the view that the Bank's remuneration policy is also in accordance with the remuneration policy applicable in the banking industry and is always implemented by considering the principles of GCG and prioritizing a remuneration system-based on performance and risk.

Nomination and Remuneration Committee Work Plan for 2025

The Nomination and Remuneration Committee has set a work plan for 2025 with the following strategic priorities:

1) Internalization of Performance Culture and Branch Productivity as an impact of Human Capital and Branch Transformation
2) Talent Development Plan
3) Remuneration of the Board of Directors, Board of Commissioners, and Employees
4) IT Human Capital Policy
5) People Analytics
6) Evaluation of Collegial and Individual KPI Achievement of the Board of Directors
7) Evaluation of Prospective Directors and Prospective Board of Commissioners of SOEs
8) Evaluation of Prospective Directors and Prospective Board of Commissioners of Subsidiaries

Remuneration of Members of the Nomination and Remuneration Committee

[ACGS C.3.4]

The remuneration policy for members of the Nomination and Remuneration Committee who come from members of the Board of Commissioners is an integral part of the honorarium given to the Board of Commissioners, and there is no special honorarium for each member of the Committee. Meanwhile, the amount of honorarium for Committee members from independent parties (Non-Commissioners) is determined by the Board of Commissioners with a maximum amount of 20% of the President Director's Salary, and no other income is given other than the honorarium. This is in accordance with the provisions of the Regulation of the Minister of SOEs Number PER-3/MBU/03/2023 dated March 20, 2023, concerning Organs and Human Resources of State-Owned Enterprises of State-Owned Enterprises.

Risk Monitoring Committee

[ACGS (B).D.6.1]

The Risk Monitoring Committee is established and reports directly to the Board of Commissioners to assist in overseeing risk management implementation and to ensure that the Bank's risk

management adheres to adequate procedures and methodologies in compliance with applicable regulations and Good Corporate Governance (GCG) principles. Through this committee, BNI can maintain its business activities within acceptable and profitable limits.

Legal Basis for the Establishment of the Risk Monitoring Committee

The legal foundation for the establishment of BNI's Risk Monitoring Committee refers to several laws and regulations, including:

1) Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, on Governance Implementation for Commercial Banks.
2) Financial Services Authority Circular Letter No. 13/SEOJK.03/2017, dated March 17, 2017, on Governance Implementation for Commercial Banks.
3) Regulation of the Minister of State-Owned Enterprises (SOEs) of the Republic of Indonesia No. PER-3/MBU/03/2023, dated March 20, 2023, on SOE Organizations and Human Resources.
4) Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-2/MBU/03/2023, dated March 3, 2023, on SOE Governance Guidelines and Significant Corporate Activities.
5) Decree of the Deputy for Finance and Risk Management, Ministry of SOEs No. SK-3/DKU.MBU/05/2023, dated May 26, 2023, on Technical Guidelines for the Composition and Qualifications of Risk Management Bodies within SOEs.
6) Bank Indonesia and Financial Services Authority regulations on Risk Management Implementation for Commercial Banks and Integrated Risk Management for Financial Conglomerates.
7) Financial Services Authority regulations on Risk Management for Commercial Banks and Integrated Risk Management for Financial Conglomerates.
8) Articles of Association of PT Bank BNI (Persero) Tbk and its amendments.
9) Board of Commissioners Decree No. Kep/002/DK/2004, dated March 1, 2004, on the Establishment of the Risk and Compliance Committee.

Risk Monitoring Committee Charter

In performing its supervisory duties over the Bank's risk management handled by the Board of Directors and its supporting units, all members of the Risk Monitoring Committee must adhere to the Risk Monitoring Committee Charter. This charter is periodically reviewed, with the latest revision updated through Board of Commissioners Decree No. KEP/017/DK/2024, dated June 6, 2024, concerning the Risk Monitoring Committee Charter of PT Bank Negara Indonesia (Persero) Tbk.

The Risk Monitoring Committee Charter contains:

1. The foundation for the establishment and duties of the Risk Monitoring Committee.
2. The objectives of the Risk Monitoring Committee.
3. The structure and membership of the Risk Monitoring Committee.
4. Membership requirements for the Risk Monitoring Committee.
5. Duties of the Risk Monitoring Committee.
6. Authorities of the Risk Monitoring Committee.
7. Rights and obligations of the Risk Monitoring Committee.
8. Meetings of the Risk Monitoring Committee, and
9. The tenure of Risk Monitoring Committee members.

The Risk Monitoring Committee Charter is continuously refined and updated periodically by taking into account developments or changes in applicable laws and regulations as well as current conditions. The Risk Monitoring Committee Charter has been uploaded to the BNI website, namely: https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Komite-Pemantau-Risiko-2024.pdf.

Duties and Responsibilities of the Risk Monitoring Committee

The duties and responsibilities of BNI's Risk Monitoring Committee, as stipulated in the Risk Monitoring Committee Charter, include:

1) Evaluating the alignment between risk management policies and their implementation, specifically:
   a. Assessing the consistency between the Bank's risk management policies and their execution, covering credit risk, market risk, liquidity risk, operational risk, strategic risk, legal risk, compliance risk, and reputational risk.
   b. Reviewing the alignment of integrated risk management policies with their implementation, encompassing the eight risks mentioned above, along with insurance risk and intra-group transaction risk.
   c. Providing recommendations to the Board of Commissioners on the adequacy of risk management policies and their implementation to ensure effective risk control.

d. Reviewing and providing opinions to the Board of Commissioners on the General Credit Policy and other regulatory-required policies submitted by the Board of Directors for approval.

2) Monitoring and evaluating the performance of the risk management committee and the risk management unit to provide recommendations to the Board of Commissioners, including:
   a. Monitoring the execution of the Risk Management Unit's work plan and the duties of the Risk Management Committee.
   b. Monitoring the implementation of the Integrated Risk Management Unit's work plan and the duties of the Integrated Risk Management Committee.
   c. Recommending improvements to the effectiveness of risk management at BNI, including the integrated risk management with its subsidiaries.
   d. Evaluating and reporting regulatory risk assessments to the Board of Commissioners.
3) Carrying out other specific duties related to the functions and scope of the Risk Monitoring Committee as assigned by the Board of Commissioners.

Authorities of the Risk Monitoring Committee

To support the implementation of supervisory duties over the Bank's risk management, the Risk Monitoring Committee is delegated a number of authorities in accordance with those regulated in the Risk Monitoring Committee Charter, namely as follows:

1) Accessing records or information related to employees, funds, assets, and other resources of BNI relevant to its duties, with a written report submitted to the Board of Commissioners.
2) Conducting random tests and inspections of BNI branches, representative offices, regional offices, and business units as necessary.
3) Communicate directly with parties related to the duties of the Risk Monitoring Committee, including communicating matters related to financial and management information.
4) Collaborating with the Risk Management Committee, Integrated Risk Management Committee, Risk Management Unit, and other relevant units.

Rights and Obligations of the Risk Monitoring Committee

The rights and obligations of the Risk Monitoring Committee include:

1) Performing duties in accordance with the Risk Monitoring Committee Charter.
2) Independent committee members are entitled to honorariums from BNI, the amount of which determined by the Board of Commissioners in compliance with applicable regulations.
3) Maintaining the confidentiality of all documents, data, and information related to the Risk Monitoring Committee activities.
4) Preparing and submitting the Annual Work Plan and Budget to the Board of Commissioners before the start of the financial year, a copy of which is submitted by the Board of Commissioners to the Board of Directors for their information. The implementation of the Risk Monitoring Committee's Annual Work Plan and Budget is reported to the Board of Commissioners.
5) Prepare and submit a report to the Board of Commissioners signed by the Committee Chairperson and Committee Members as follows:
   a. Reports on the execution of duties, with recommendations if necessary.
   b. Quarterly and annual reports.
6) Reporting to the General Meeting of Shareholders (GMS) through the Board of Commissioners regarding responsibilities, achievements, and other relevant matters.
7) Prohibited from accepting gifts or benefits related to their position.
8) Allocating sufficient time to fulfill their duties effectively.
9) Independent committee members must be present at the company during working hours, with at least:
   a. At least 2 (two) days in one week according to the days and attendance schedule determined by the Board of Commissioners and/or the Committee Chairperson, including to attend Committee Meetings and carry out other duties according to the duties and obligations that have been determined. and
   b. If necessary, at the request of the Board of Commissioners and/or the Chairman of the Committee, Committee Members who come from independent parties are required to be present at the company or at the Board of Commissioners Meeting or Committee Meeting, or at activities that must be attended by the Board of Commissioners according to their needs outside of the days and routine attendance schedule.

10) In order to avoid overlapping implementation of tasks among the committees under the Board of Commissioners and cooperation in implementing tasks, the Risk Monitoring Committee is required to coordinate with other Committees under the Board of Commissioners.

Appointment, Dismissal, and Term of Office of the Risk Monitoring Committee Members

Risk Monitoring Committee members from the Board of Commissioners serve the same term as their tenure as commissioners, as determined by the GMS. With these provisions, members of the Risk Monitoring Committee who are members of the Board of Commissioners will automatically cease as members of the committee if their term of office as members of the Board of Commissioners ends. If a member of the Board of Commissioners who is the Chairperson of the Risk Monitoring Committee resigns before their term of office as a member of the Board of Commissioners ends, the position of Chairperson of the Risk Monitoring Committee will be replaced by another Independent Commissioner.

In accordance with the provisions of the Risk Monitoring Committee Charter, the term of office of members of the Risk Monitoring Committee who come from independent parties is a maximum of 3 (three) years and can be extended once for a period of 2 (two) years so that the total term of office of members of the Risk Monitoring Committee at the Bank is a maximum of only 5 (five) years without reducing the right of the Board of Commissioners to dismiss the relevant Committee member at any time.

By considering the proposal from the Chairman of the Risk Monitoring Committee, the Board of Commissioners also has the authority to dismiss at any time members of the Risk Monitoring Committee who are independent parties if they are deemed incapable of carrying out their duties and obligations as members of the committee as stipulated in the Decree on the appointment/resignation of the relevant committee member and/or the Work Agreement between the relevant committee member and BNI, and based on applicable regulations. In the event that a member of the Board of Commissioners who serves as Chairman of the Risk Monitoring Committee resigns as a member of the Board of Commissioners, the relevant Committee Chairman must be replaced by another member of the Board of Commissioners within a maximum of 30 (thirty) days.

Structure, Membership, and Expertise of the Risk Monitoring Committee

The composition and membership of the Risk Monitoring Committee are ensured to have met the provisions applicable in the scope of BNI, namely as follows:

1) The Risk Monitoring Committee is formed based on the decision of the Board of Commissioners meeting and is placed in a Decree of the Board of Commissioners.
2) The Risk Monitoring Committee is under the coordination of the Board of Commissioners and is directly responsible to the Board of Commissioners.
3) The appointment of Risk Monitoring Committee Members is carried out by the Board of Directors based on the Decision of the Board of Commissioners Meeting.
4) The membership of the Risk Monitoring Committee consists of at least:
   a. 1 (one) Independent Commissioner who also serves as chairman
   b. 1 (one) person from an independent party who has expertise in the field of risk management
   c. 1 (one) person from an independent party who has expertise in the field of finance
   d. Committee members who are not members of the Board of Commissioners/Supervisory Board of BUMN are a maximum of 2 (two) people, where one of the committee members has knowledge and/or expertise in the field of risk management
   e. The expertise of the Independent Party as referred to in points b) and c) above is proven by having a risk management certificate as applicable to the Board of Directors and having a competency certificate that supports the implementation of the functions and responsibilities of the committee.
5) Independent commissioners and independent parties who are members of the Risk Monitoring Committee must be at least 51% (fifty one per hundred) of the total number of members of the Risk Monitoring Committee.
6) The Chairperson of the Risk Monitoring Committee is an Independent Commissioner who also serves as a member as determined in a decision of the Board of Commissioners meeting, and is positioned in a Decree of the Board of Commissioners.
7) The Chairperson of the Risk Monitoring Committee may only serve as Chairperson of a Committee in a maximum of 1 (one) other Committee at BNI.
8) Former members of the Board of Directors and former executive officers of BNI or parties who have a relationship with BNI that can affect the ability to act independently who will become

independent members of the Risk Monitoring Committee are required to undergo a cooling off period of at least 6 (six) months. The cooling off period provisions do not apply to former members of the Board of Directors and former executive officers of BNI whose duties are only to carry out supervisory functions for at least 6 (six) months. What is meant by the cooling off period is the cooling off period as regulated in the Regulations and Circulars of the Financial Services Authority concerning the Implementation of Governance for Commercial Banks in force.

9) Members of the Risk Monitoring Committee who come from independent parties are not permitted to hold concurrent positions as:
   a. Members of the Board of Commissioners/ Supervisory Board at State-Owned Enterprises (BUMN)/other companies;
   b. Secretary/staff of the Secretary of the Board of Commissioners/Supervisory Board at BUMN/ other companies.
10) The Board of Directors carries out the appointment and dismissal of members of the Risk Monitoring Committee who come from independent parties based on the decision of the Board of Commissioners meeting and the Decree of the Board of Commissioners.
11) The Chairperson of the Risk Monitoring Committee has the right to propose the replacement of members of the Risk Monitoring Committee to the Board of Commissioners if one of the members of the Risk Monitoring Committee ends his/her term of office, resigns or is dismissed.
12) Members of the Risk Monitoring Committee are prohibited from coming from members of the Board of Directors of BNI or other banks. The Risk Monitoring Committee works collectively to carry out its duties to assist the Board of Commissioners.
13) The Risk Monitoring Committee is independent both in carrying out its duties and in reporting, and is directly responsible to the Board of Commissioners.
14) In carrying out its daily duties, the Committee may be assisted by staff from outside BNI or the Committee's secretary. The staff or Committee Secretary are appointed based on the decision of the Board of Commissioners Meeting and are listed in the Board of Commissioners' Decree.

Number, Composition, and Composition of Membership of the Risk Monitoring Committee

In 2024, the number of members of the BNI Risk Monitoring Committee will be 6 (six) people who are appointed based on the Decree of the Board of Commissioners listed in the Risk Monitoring Committee Profile section. Of this number, 2 (two) people are Independent Commissioners, 2 (two) people are Non-Independent Commissioners, and 2 (two) other people are Independent Parties who have competence and qualifications in the fields of risk management and finance. The number, composition and structure of the current BNI Risk Monitoring Committee membership are confirmed to have met the provisions set out in the Risk Monitoring Committee Charter.

The composition of the BNI Risk Monitoring Committee members throughout 2024 is as follows:

January 1, 2024 – December 31, 2024 Period

Name	Position	Term of Office	Period	Position in the Bank
Erwin Rijanto Slamet	Chairman	October 30, 2023-present	First	Independent Commissioner
Pahala Nugraha Mansury	Member	February 19, 2024-present	First	Vice President Commissioner
Fadlansyah Lubis	Member	December 29, 2022-current	First	Commissioner
Septian Hario Seto	Member	September 8, 2020-present	First	Independent Commissioner
Dwita Suherlina	Independent Member	January 18, 2021-present	Second	-
Bambang Setyogroho	Independent Member	June 1, 2022-present	Second	-

Risk Monitoring Committee Profiles

Chair of the Risk Monitoring Committee

Erwin Rijanto Slamet	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/016/DK/2023 dated October 30, 2023
Term of Office	October 30, 2023 - Present
Professional Certication	- Banking Risk Management Competency Certification Qualification 6 - Certified Governance Oversight Professional (CGOP)
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Member of the Risk Monitoring Committee concurrently serving as a Commissioner

Pahala Nugraha Mansury	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/019/DK/2023 dated October 30, 2023
Term of Office	February 19, 2024 - Present
Professional Certication	- Banking Risk Management Competency Certification Qualification 7 - Certified Risk Governance Professional (CRGP)
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Septian Hario Seto	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/042/DK/2020 dated September 08, 2020
Term of Office	September 8, 2020 - Present
Professional Certication	Banking Risk Management Competency Certification Qualification 6
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Fadlansyah Lubis	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/023/DK/2022 dated December 29, 2022
Term of Office	December 29, 2022 - Present
Professional Certication	Banking Risk Management Competency Certification Qualification 6
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Risk Monitoring Committee from Independent Member

Dwita Suherlina
Risk Monitoring Committee Independent Member

Age
60 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Agriculture Agronomy from Institut Pertanian Bogor (1986)
- Master's Degree in Financial Management from Universitas Padjadjaran (2003)

Legal Basis of Appointment
Appointed for the second time as a Member of the Risk Monitoring Committee since January 18, 2024, based on the Board of Commissioners Decree No. KEP/002/DK/2024 dated January 18, 2024

Term of Office
- January 18, 2021-January 17, 2024 (First Period)
- January 18, 2024-present (Second Period)

Professional Certification and/or Training
- Risk Management Certification Level 3
- Certified Governance Oversight Professional (CGOP)

Work Experience
- RM Corporate Affairs at PT Bank Bumi Daya (Persero) (19881996)
- Senior RM at Bandung Asia Africa Branch of PT Bank Bumi Daya (Persero) (1996-1999)
- Senior Manager Regional Risk Management Bandung at PT Bank Mandiri (Persero) Tbk (1999-2005)
- Assistant Vice President Regional Risk Management Bandung PT Bank Mandiri (Persero) Tbk (2006-2012)
- Vice President Regional Risk Management Bandung PT Bank Mandiri (Persero) Tbk (2012)
- Vice President Regional Risk Management Jakarta Kelapa Gading PT Bank Mandiri (Persero) Tbk (2012-2016)
- Vice President Department IV Corporate Risk Group PT Bank Mandiri (Persero) Tbk (2016-2020)
- Independent Member of the Risk Monitoring Committee at PT Bank Negara Indonesia (Persero) Tbk (2021-present)

Concurrent Position
No concurrent positions either internally at BNI or externally

Bambang Setyogroho
Member of the Risk Monitoring Committee

Age
66 years old as of December 31, 2024,

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's degree in Geological Engineering, Universitas Padjadjaran (1985)
- Master's degree in Business Administration, Universitas Indonesia (2001)
- Doctoral degree in Environmental Science, Universitas Padjajaran (2022)

Legal Basis of Appointment
Appointed for the second time as a Member of the Risk Monitoring Committee since January 18, 2024, based on the Board of Commissioners Decree No. KEP/002/DK/2024 dated January 21, 2024

Term of Office
- June 1, 2022-January 17, 2024 (First Period)
- January 18, 2024-current (Second Period)

Professional Certification and/or Training
- Risk Management Certification Level 4
- Certified Governance Oversight Professional (CGOP)

Work Experience
- ARM Commercial Credit Bank Dagang Negara (1989-1992)
- RM Corporate Credit Bank Dagang Negara (1993-1998)
- VP Corporate Credit Risk Management Group at Bank Mandiri (1999-2004)
- SVP Central Operations Group at Bank Mandiri (2005-2007)
- SVP Commercial Risk at Bank Mandiri (2007-2009)
- EVP Corporate Banking at Bank Mandiri (2010-2014)
- Independent Commissioner and Chairman of the Audit Committee at PT Sarana Multi Infrastructure (Persero) (20142017)
- Independent Member of the Integrated Governance Committee at PT Bank Negara Indonesia (Persero) Tbk (2021-2022)
- Independent Member of the Risk Monitoring Committee at PT Bank Negara Indonesia (Persero) Tbk (2022-present)

Concurrent Position
No concurrent positions either internally at BNI or externally

Qualifications, Education, and Work Experience of the Risk Monitoring Committee

All members of BNI's Risk Monitoring Committee have individually fulfilled both the general and specific eligibility criteria as outlined in the Risk Monitoring Committee Charter, as follows:

A. General Requirements
   1) Have integrity, good character and morals and sufficient work experience related to the duties of other committees.
   2) Have no personal interests/connections that can have a negative impact and conflict of interest on BNI.

B. Competency Requirements
   1) Have adequate expertise, ability, knowledge and experience in the fields of economics, finance and banking or risk management in accordance with the requirements stipulated in the Financial Services Authority Regulation governing the requirements for members of the Risk Monitoring Committee.
   2) Be able to work together and have the ability to communicate well and effectively and provide sufficient time to carry out their duties.
   3) Have sufficient knowledge and understanding of laws and regulations in the fields of banking, Capital Markets, BUMN and other laws and regulations, especially those related to BNI's operational activities, implementation of GCG and risk management.

In accordance with the provisions above, the Bank ensures that the current Chairman and all members of the Risk Monitoring Committee meet the required educational qualifications and work experience criteria, as detailed in the table below:

Educational Qualifications and Work Experience, and Fields of Expertise of the Risk Monitoring Committee

Name	Position	Education	Work Experience	Areas of Expertise
Erwin Rijanto Slamet	Chairman	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economy
Pahala Nugraha Mansury	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting • Finance
Septian Hario Seto	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting • Finance

Name	Position	Education	Work Experience	Areas of Expertise
Fadlansyah Lubis	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Law
Dwita Suherlina	Independent Member	• Bachelor's Degree in Agriculture, majoring in Agronomy from Bogor Agricultural University (1986) • Master of Management in Financial Management from Padjadjaran University (2003)	Relationship Manager for Corporate Credit at PT Bank Bumi Daya (Persero) Senior Relationship Manager at Bandung Asia Afrika Branch, PT Bank Bumi Daya (Persero) Senior Manager of Regional Risk Management at PT Bank Bumi Daya (Persero) AVP of Regional Risk Management at PT Bank Mandiri (Persero) Tbk, Bandung Vice President of Regional Risk Management at PT Bank Mandiri (Persero) Tbk, Bandung Vice President of Regional Risk Management at PT Bank Mandiri (Persero) Tbk, Kelapa Gading, Jakarta Vice President of Department IV Corporate Risk Group at PT Bank Mandiri (Persero) Tbk Independent Member of the Risk Monitoring Committee at PT Bank Negara Indonesia (Persero) Tbk	• Agriculture • Finance
Bambang Setyogroho	Independent Member	• Bachelor's Degree in Geological Engineering from Padjadjaran University (1985) • Master's Degree in Business Administration from the University of Indonesia (2001) • Doctorate in Environmental Science from Padjadjaran University (2022)	Relationship Manager for Commercial Credit at Bank Dagang Negara Relationship Manager for Corporate Credit at Bank Dagang Negara Vice President of Corporate Credit Risk Management Group at Bank Mandiri Senior Vice President of Central Operations Group at Bank Mandiri Senior Vice President of Commercial Risk at Bank Mandiri Executive Vice President of Corporate Banking at Bank Mandiri Independent Commissioner and Chair of the Audit Committee at PT Sarana Multi Infrastructure (Persero) Independent Member of the Integrated Governance Committee at PT Bank Negara Indonesia (Persero) Tbk Independent Member of the Risk Monitoring Committee at PT Bank Negara Indonesia (Persero) Tbk	Banking (Credit)

Statement of Independence of the Risk Monitoring Committee

All members of the Risk Monitoring Committee declare their ability to carry out their duties, responsibilities, and authorities professionally and independently, without interference from any party that is not in accordance with applicable laws and regulations. This independence is affirmed through the signing of an integrity pact by all committee members, committing to compliance with all legal provisions and Good Corporate Governance (GCG) principles.

The aspects of independence of the Risk Monitoring Committee members are outlined in the following table:

Risk Monitoring Committee Independence

Name	Independency Aspect				
	No financial Relationship With the Board of Commissioners And the Board of Directors	No Management Relationship in BNi, Subsidiaries, or Affiliated Companies	No shares in BNi	No familial Relationship With the Board of Commissioners, the Board of Directors And/or fellow Members of Risk Monitoring Committee	Not serving on Boards of Political Parties, Government Officials
Erwin Rijanto Slamet	✓	✓	✓	✓	✓
Pahala Nugraha Mansury	✓	✓	✓	✓	✓
Septian Hario Seto	✓	✓	✓	✓	✓
Fadlansyah Lubis	✓	✓	✓	✓	✓
Dwita Suherlina	✓	✓	✓	✓	✓
Bambang Setyogroho	✓	✓	✓	✓	✓

Concurrent Position Information

As a form of transparency, information regarding the concurrent positions of the Risk Monitoring Committee members is detailed in the following table:

Name	Position in the Bank	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Erwin Rijanto Slamet	Chairman of the Risk Monitoring Committee & Independent Commissioner	None	None	None
Pahala Nugraha Mansury	Member & Deputy Main Commissioner	None	None	None
Fadlansyah Lubis	Member & Commissioners	None	None	None
Septian Hario Seto	Member & Independent Commissioner	None	None	None
Dwita Suherlina	Independent Member	None	None	None
Bambang Setyogroho	Independent Member	None	None	None

Risk Monitoring Committee Meetings

Meeting Policy

As stipulated in the Risk Monitoring Committee Charter, the following are the policies and procedures for conducting Risk Monitoring Committee meetings at BNI:

1) The Risk Monitoring Committee shall hold a meeting at least 1 (one) time in 1 (one) month.
2) The Risk Monitoring Committee meeting may only be held if attended by at least 51% (fifty one percent) of the total members including an Independent Commissioner and members from Independent Parties.
3) Meetings are chaired by the Chairman of the Risk Monitoring Committee or the most senior member if the Chairman is unavailable.
4) If necessary, the Risk Monitoring Committee may invite relevant parties to attend the meeting.
5) Decisions are made based on consensus.
6) In the event that no consensus is reached, decisions are made based on a majority vote with the principle of 1 (one) person, 1 (one) vote.
7) The decision of the Risk Monitoring Committee meeting is considered valid if approved by more than 1/2 (one half) of the number of members of the Risk Monitoring Committee present. The regulation of the voting rights of Committee members adheres to the principle of 1 (one) person 1 (one) vote.
8) The results of the Committee meeting must be stated in the minutes of the meeting signed by all members of the Committee present and documented in accordance with laws and regulations.
9) Dissenting opinions that occur in the committee meeting must be clearly stated in the minutes of the meeting along with the reasons for the dissenting opinions.
10) Meeting minutes are prepared by the Committee Secretary.
11) The Risk Monitoring Committee submits meeting minutes in writing to the Board of Commissioners.
12) Attendance of committee members is reported in the committee's quarterly and annual reports.

Meeting Frequency and Attendance in 2024

Throughout 2024, the Risk Monitoring Committee has held 23 (twenty three) meetings. The frequency of the meetings has met the provisions stipulated in the Risk Monitoring Committee Charter.

The following table provides details on committee members' attendance in the 2024 meetings:

Name	Position	Number of Meetings	Attended	Percentage
Erwin Rijanto Slamet	Chairman	23	23	100%
Pahala Nugraha Mansury	Member	17	12	71%
Fadlansyah Lubis	Member	23	22	96%
Septian Hario Seto	Member	23	18	78%
Dwita Suherlina	Independent Member	23	22	96%
Bambang Setyogroho	Independent Member	23	23	100%

Meeting Agenda

The agenda for the Risk Monitoring Committee meetings throughout 2024 is as follows:

No.	Meeting Date	Meeting Agenda	Audit Committee Member	Invitee
1	January 2, 2024	Internal KPR Meeting	• Erwin Rijanto Slamet • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Chair of the KPR and all KPR Members
2	January 9, 2024	Discussion on Leading and Lagging Indicators for 8 Key Risks	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, Head of the ERM Division, Head of the ORM Division, Head of IAD, and Senior Operational Risk Executive (SORX)
3	January 23, 2024	Internal KPR Meeting	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Chair of the KPR and all KPR Members
4	January 30, 2024	Evaluation of Credit in the Commercial Banking Segment	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Bambang Setyogroho	Chair of the Audit Committee, Director of Enterprise & Commercial Banking, Director of Risk Management, Director of Network & Services, and Heads of Related Divisions
5	February 6, 2024	Evaluation of Compliance Function Implementation and Anti-Fraud Strategy for the Fourth Quarter of 2023	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, Director of Human Capital & Compliance, Director of Risk Management, and Heads of Related Divisions
6	February 13, 2024	Evaluation of Integrated Risk Profile and Integrated KPMM for the Second Semester of 2023	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Integrated Governance Committee, Director of Risk Management, and Heads of Related Divisions
7	March 5, 2024	• Discussion on the Review of the Risk Appetite Statement (RAS) for BNI 2024 • Establishment of BNI's Priority Sectors, Negative List, and Loan Exposure Limit (LEL)	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Risk Management Director, SEVP of Credit Risk, and Heads of Related Divisions
8	March 19, 2024	Evaluation of the End-to-End Credit Process implementation for the Commercial, Small, and Consumer segments	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Risk Management Director, Enterprise & Commercial Banking Director, Retail Banking Director, SEVP of Credit Risk, and Heads of Related Divisions
9	March 26, 2024	Evaluation of Policies and Development of the Operational Risk Management	• Erwin Rijanto Slamet • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Risk Management Director and Heads of Related Divisions
10	April 30, 2024	Framework up to the recognition of Operational Risk losses Evaluation of Loan at Risk and Write-offs in the Corporate Banking and Enterprise Banking segments for the position as of March 2024	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, Enterprise & Commercial Banking Director, SEVP of Corporate Banking, SEVP of Credit Risk, and Heads of Related Divisions

No.	Meeting Date	Meeting Agenda	Audit Committee Member	Invitee
11	May 7, 2024	In-depth Evaluation of BNI's Performance for the First Quarter of 2024 (Joint Meeting with the Audit Committee)	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Wholesale & International Banking Director, Enterprise & Commercial Banking Director, Director of Retail Banking, Digital & Integrated Transaction Banking Director, Network & Services Director, Risk Management Director, Technology & Operations Director, and Heads of Related Divisions
12	June 7, 2024	• Evaluation and Strategy for Increasing BNI's Third Party Funds (DPK) • Progress on the development of New Mobile Banking and new capabilities for BNIdirect	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, Retail Banking Director, Digital & Integrated Transaction Banking Director, Technology & Operations Director, SEVP of Retail Digital Solutions, SEVP of Wealth Management, and Heads of Related Divisions
13	July 2, 2024	• Evaluation of risks related to transactions in the Treasury • Plans and Strategies for Reducing Special Rate Third Party Funds (DPK)	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, of Risk Management, Director, Institutional Banking Director, SEVP of Treasury, SEVP of Corporate Banking, and Heads of Related Divisions
14	July 16, 2024	Evaluation of Loan at Risk and Write-offs in the Region for the position as of June 2024	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, Risk Management Director, Network & Services Director, and Heads of Related Divisions/Regions
15	August 6, 2024	Evaluation of Integrated Risk Profile and Integrated KPMM for the First Semester of 2024	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Integrated Governance Committee, Risk Management Director, and Heads of Related Divisions
16	August 6, 2024	Update on the current condition of BNI debtors	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Wholesale & International Banking Director, Risk Management Director, and Heads of Related Divisions
17	August 27, 2024	Internal KPR Meeting	• Erwin Rijanto Slamet • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Chair of the KPR and all KPR Members
18	August 27, 2024	Discussion on the Proposal to Review the Bank Credit Policy (KPB) for 2024	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Dwita Suherlina • Bambang Setyogroho	Head of the PGV Division
19	September 5, 2024	Discussion on BNI's Top Risks	• Erwin Rijanto Slamet • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Head of the ERM Division and Head of the ORM Division
20	September 10, 2024	• Discussion on Individual Customer Profitability in the Corporate Banking segment • Realization/Progress on the development of the Value Chain in the Corporate segment	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	SEVP of Corporate Banking, SEVP of Credit Risk, and Heads of Related Divisions

No.	Meeting Date	Meeting Agenda	Audit Committee Member	Invitee
21	October 15, 2024	Evaluation of Loan at Risk and Write-offs across all segments in BNI for the position as of September 2024	• Erwin Rijanto Slamet • Pahala Nugraha Mansury [1)] • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Audit Committee, Risk Management Director, Enterprise & Commercial Banking Director, Wholesale & International Banking Director, Retail Banking Director, SEVP of Credit Risk, and Heads of Related Divisions
22	November 19, 2024	• Evaluation of the Implementation of BNI's Risk Management Function during 2024, as well as Discussion on the Work Plan for the ERM Division and ORM Division for 2024 • Evaluation and Report to the Board of Commissioners on the Realization of the Tasks of the Risk Management Committee & Integrated Risk Management Committee	• Erwin Rijanto Slamet • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Risk Management Director and Heads of Related Divisions
23	December 24, 2024	• Evaluation of risks related to transactions in the Treasury • Evaluation of the process/ mechanism for establishing Special Rates by the Treasury Division	• Erwin Rijanto Slamet • Septian Hario Seto • Fadlansyah Lubis • Dwita Suherlina • Bambang Setyogroho	Risk Management Director, SEVP of Treasury, and Heads of Related Divisions

1) Effectively serving since February 19, 2024

Risk Monitoring Committee Member Competency Improvement Program in 2024

In 2024, members of the Risk Monitoring Committee have undertaken the following education or training:

Name of Training/Workshop/ Conference/seminar	Implementation Date	Organizer
Erwin Rijanto Slamet – Chairman of KPR/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Pahala Nugraha Mansury – Member of KPR/Deputy President Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024		
Septian Hario Seto – Member of KPR/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024.		
Fadlansyah Lubis – Member of KPR/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2024		
Dwita Suherlina – KPR Member (Independent Party)		
Banking Risk Management Training Program Qualification 5	June 25, 2024	Lembaga Pengembangan Perbankan Indonesia (LPPI)
Brain Cipher Ransomware Uncovered: Strategies for Mitigating Cyber Risk in the Most Effective Way	July 09, 2024	Proxsis
CGOP Training: Masterclass in Corporate Governance	August 12-13, 2024	Center for Risk Management & Sustainability (CRMS)
Bambang Setyogroho – KPR Member (Independent Party)		
Brain Cipher Ransomware Uncovered: Strategies for Mitigating Cyber Risk in the Most Effective Way	July 09, 2024	Proxsis
CGOP Training: Masterclass in Corporate Governance	August 12-13, 2024	Center for Risk Management & Sustainability (CRMS)

Work Program and Implementation of the Risk Monitoring Committee's Duties in 2024

In 2024, the Risk Monitoring Committee effectively executed all planned agendas set at the beginning of the year. The results of committee meetings, monitoring activities, and evaluations/reviews were submitted to the Board of Commissioners as reports and recommendations, both in written form and during Board meetings. In 2024, the Risk Monitoring Committee held 23 (twenty three) meetings and made 79 (seventy nine) reviews/evaluations.

The following is a report on the implementation of the Risk Monitoring Committee's duties, covering activities and recommendations related to risk management at the Bank:

1) Meetings and reviews concerning BNI's Bank Soundness Level, Risk Profile, Integrated Risk Profile, and the execution of the Risk Management Committee and Integrated Risk Management Committee's duties.
2) Reviews related to the soundness level of BNI's Pension Fund (DPLK), its risk management accountability, and the proposed Risk Appetite Statement for DPLK BNI.
3) In-depth discussions on key issues related to Operational Risk, Legal Risk, Compliance Risk, Strategic Risk, Reputation Risk, Credit Risk, Market Risk, Liquidity Risk, Insurance Risk, and Intra-Group Risk.
4) Implementation of credit-related duties:
   a. Meetings and reviews on the handling of Loan at Risk (LaR) and credit restructuring at the BNI-wide and regional levels across Corporate, Enterprise, Commercial, Small (including KUR), and Consumer segments:
   b. Meetings and reviews of credit consultations submitted by the Board of Directors to the Board of Commissioners.
   c. Meetings and reviews on Remedial & Recovery discussions.
   d. Joint working visits with the Audit Committee to conduct an in-depth assessment of the Commercial Banking segment.
5) Review of updates to the General Risk Management Policy and the General Integrated Risk & Capital Management Policy proposed by the Board of Directors to the Board of Commissioners.
6) Meetings and reviews of updates to the Bank's Credit Policy (KPB) proposed by the Board of Directors to the Board of Commissioners.
7) Review of updates to BNI's 2024/2025 Recovery Plan Document submitted by the Board of Directors for the Board of Commissioners' approval.
8) Review of the 2025 Bank Business Plan (RBB) / Corporate Budget Work Plan (RKAP) and the 2024 RBB/RKAP revisions.
9) Meetings and reviews on BNI's 2024 Risk Appetite Statement, proposed by the Board of Directors for approval by the Board of Commissioners.
10) Review of the Write-Off Policy for MSMEs.
11) Review of BNI's Good Corporate Governance (GCG) Policy.
12) Review of the Risk Monitoring Committee Charter.

Evaluation of the Risk Monitoring Committee on the Implementation of Risk Management at the Bank

The Risk Monitoring Committee continues to support the duties and functions of the Board of Commissioners in actively supervising the management of the Risk Profile, through supervision of inherent risks and strengthening the quality of risk management implementation, implementing good corporate governance with effective risk management through the role and function of the risk committee, maximizing added value for shareholders, managing capital comprehensively, and ensuring profitability and sustainable business growth, so that the bank's health level based on overall risk can be maintained in a Healthy condition. In 2024, the Risk Monitoring Committee has evaluated the implementation of the Bank's risk management and assessed that the Bank's risk management has been carried out adequately.

Risk Monitoring Committee's Work Plan for 2025

To support the effectiveness of the Board of Commissioners' risk management oversight, the Risk Monitoring Committee has established its 2025 work plan, including meetings, reviews, and reports to the Board of Commissioners, with the following strategic priorities:

1) Evaluation of the Bank's Soundness Level every six months (semi-annually).
2) Evaluation of the Individual Risk Profile every three months (quarterly).
3) In-depth evaluation of issues and reports to the Board of Commissioners concerning Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Strategic Risk, Compliance Risk, and Reputation Risk (individually), as well as Intra-Group Transaction Risk and Insurance Risk (on an integrated basis).
4) Monitoring and evaluation of the Risk Management Unit (SKMR), Integrated Risk & Capital Management Unit (SKMRT), Risk Management Committee (KMR), and Integrated Risk Management Committee (KMRT).
5) Periodic or annual review of General Policies and Documents that require approval from the Board of Commissioners, including: Bank Credit Policy (KPB), General Risk Management Policy (KUMR), General Integrated Risk Management Policy (KUMRT), Good Corporate Governance Policy,

Integrated Governance Policy, Updates to the Recovery Action Plan, and so on in accordance with the Board of Directors' proposals to the Board of Commissioners.
6) Review/discussion of proposals/requests from the Board of Directors that require approval from the Board of Commissioners and follow-up of the Board of Commissioners' dispositions regarding reports/letters submitted to the Board of Commissioners and reports to the Board of Commissioners.
7) Review and update of the Risk Monitoring Committee Charter as needed, in response to regulatory developments and changing conditions.

Remuneration of Risk Monitoring Committee Members [ACGS C.3.4]

The remuneration policy for Risk Monitoring Committee members who are also members of the Board of Commissioners is integrated into the honorarium provided to the Board of Commissioners, with no additional remuneration for committee membership. Meanwhile, the honorarium for independent (non-Commissioner) committee members is determined by the Board of Commissioners, with a maximum amount set at 20% of the President Director's salary. No additional income is provided beyond this honorarium. This policy aligns with the provisions of the Indonesian Ministry of SOEs Regulation No. PER-3/MBU/03/2023, dated March 20, 2023, regarding the Governance and Human Resources of State-Owned Enterprises.

Integrated Governance Committee

The Integrated Governance Committee is formed by and is directly responsible to the BNI Board of Commissioners as the Main Entity (EU), specifically to help strengthen the supervisory function related to the implementation of Integrated Governance in the BNI Financial Conglomerate, in accordance with applicable laws and regulations.

Legal Basis for the Establishment of the Integrated Governance Committee

The establishment of the BNI Integrated Governance Committee is based on the following regulations:
1) Financial Services Authority Regulation Number 18/POJK.03/2014 dated November 18, 2014 concerning the Implementation of Integrated Governance for Financial Conglomerates.
2) Financial Services Authority Circular Letter No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance for Financial Conglomerates.
3) Financial Services Authority Regulation Number 45/POJK.03/2020 dated October 16, 2020 concerning Financial Conglomerates.
4) Regulation of the Financial Services Authority of the Republic of Indonesia Number 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks.
5) Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia Number PER 2/MBU/03/2023 dated March 3, 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.
6) Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia Number PER 3/MBU/03/2023 dated March 20, 2023 concerning Organs and Human Resources of State-Owned Enterprises.
7) Decree of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk No. KEP/006/DK/2015 dated June 22, 2015 concerning the Establishment of the Integrated Governance Committee.

Integrated Governance Committee Charter

BNI's Integrated Governance Committee has a Charter that regulates the membership, structure, authority, duties and responsibilities, meetings, activities and work procedures of the Integrated Governance Committee in carrying out its functions. The Integrated Governance Committee Charter is reviewed periodically to remain in line with applicable provisions and the Bank's needs. The latest amendment to the Integrated Governance Committee Charter was stipulated through the Decree of the Board of Commissioners No. KEP/016/DK/2024 dated June 6, 2024 concerning the Integrated Governance Committee Charter of PT Bank Negara Indonesia (Persero) Tbk.

The scope regulated in the Integrated Governance Committee Charter includes:
1. Basis for the establishment and implementation of the duties of the Integrated Governance Committee;
2. Purpose and objectives of the establishment of the Integrated Governance Committee;
3. Structure and membership of the Integrated Governance Committee;
4. Membership requirements of the Integrated Governance Committee;
5. Duties of the Integrated Governance Committee;
6. Authority of the Integrated Governance Committee;
7. Rights and obligations of the Integrated Governance Committee;
8. Meetings of the Integrated Governance Committee; and

9. Term of office of members of the Integrated Governance Committee.

The Bank's Integrated Governance Committee Charter has been uploaded to the BNI website, namely https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Komite-Tata-Kelola-Terintegrasi-2024.pdf.

Duties and Responsibilities of the Integrated Governance Committee

The Integrated Governance Committee has duties and responsibilities that at least include:

1) Evaluating the implementation of Integrated Governance at least through an assessment of the adequacy of internal control, the implementation of integrated compliance functions and the implementation of Integrated Governance Guidelines. In conducting the evaluation, the Integrated Governance Committee obtains information in the form of evaluation results on the implementation of internal audits, the implementation of risk management and the compliance function of each Financial Services Institution from members of the Board of Commissioners of each Financial Services Institution who are members of the Integrated Governance Committee.
2) Providing recommendations to the Board of Commissioners of the Main Entity regarding the results of the evaluation of the implementation of Integrated Governance and the improvement of the Integrated Governance Guidelines.
3) Carrying out the duties of the Board of Commissioners of the Main Entity to review and evaluate materials related to the duties of the Integrated Governance Committee and/or other duties determined by the Board of Commissioners of the Main Entity.
4) Evaluating the suitability between the Integrated Governance policy and the implementation of the policy and providing recommendations to the Board of Commissioners of the Main Entity regarding the Integrated Governance policy and its implementation to ensure that Integrated Governance management has been carried out adequately.
5) Before the current fiscal year, the Integrated Governance Committee must prepare and submit an Annual Work Plan and Budget to the Board of Commissioners of the Main Entity for determination, a copy of which is submitted by the Board of Commissioners of the Main Entity to the Board of Directors of the Main Entity for information. The implementation of the Integrated Governance Committee's Annual Work Plan and Budget is reported to the Board of Commissioners of the Main Entity.
6) Members of the Integrated Governance Committee must carry out their duties properly and maintain the confidentiality of all documents, data, information and everything related to the implementation of the Integrated Governance Committee's Duties and are only used for the purpose of carrying out their duties.

Authority of the Integrated Governance Committee

In carrying out its duties to assist the Board of Commissioners of the Main Entity, the Integrated Governance Committee has the following authorities:

1) The Integrated Governance Committee may request explanations or necessary information regarding employees, funds, assets, and other resources related to the implementation of its duties to the Financial Services Institution in the BNI financial conglomerate, while still observing applicable regulations. The Committee is required to report in writing the results of the assignment to the Board of Commissioners of the Main Entity.
2) Members of the Integrated Governance Committee are authorized to communicate with work units in the Main Entity, for functions including Internal Audit, Legal and Compliance, Finance and Risk Management, Human Resources and aspects of the Business Operations function as needed, to obtain information, clarification and request reports needed in an integrated manner and/or to fulfill the duties of the Integrated Governance Committee.
3) To carry out its duties, the Integrated Governance Committee may cooperate or coordinate with Committees under the Board of Commissioners of other Main Entities, as well as relevant divisions/units/work units in the Main Entity or in other Financial Services Institutions in the BNI Financial Conglomerate.

Policy on Appointment, Dismissal, and Term of Office of the Integrated Governance Committee Members

1) The Chairperson and members of the Integrated Governance Committee are appointed and dismissed by the Board of Commissioners of the Main Entity.
2) Members of the Integrated Governance Committee who are members of the Board of Commissioners of the Main Entity or the Board of Commissioners and Supervisory Board of Financial Services Institutions:
   a. Serve a term that aligns with their appointment as members of the Board of Commissioners or Supervisory Board, as determined by the General Meeting of Shareholders (GMS).

b. Automatically cease to hold office when their term as a member of the Board of Commissioners or Supervisory Board ends.

3) The term of office of members of the Integrated Governance Committee who come from independent parties is a maximum of 3 (three) years and can be extended once for a period of 2 (two) years so that the total term of office of members of the Integrated Governance Committee who come from independent parties in the company is a maximum of 5 (five) years without reducing the rights of the Board of Commissioners of the Main Entity to dismiss the relevant committee members at any time.
4) The Board of Commissioners of the Main Entity may dismiss members of the Integrated Governance Committee at any time if they are deemed to have failed to perform their duties as stipulated in their appointment letter.
5) If the Board of Commissioners member serving as Chairperson of the Integrated Governance Committee resigns from the Board of Commissioners of the Main Entity, the Chairperson must be replaced by another Independent Commissioner of the Main Entity who also serves as Chairperson of one of the other committees within the Main Entity, within a maximum of 30 (thirty) days.
6) The dismissal and appointment of committee members must be reported to the General Meeting of Shareholders (GMS).

Number, Structure, and Composition of the Integrated Governance Committee Members

In 2024, the Integrated Governance Committee of BNI consisted of 10 members, appointed based on the Board of Commissioners' Decree No. KEP/002/DK/2018 dated February 8, 2018, concerning the "General Provisions on Appointment, Dismissal, Assignment of Duties, and Honorarium of Committee Members under the Board of Commissioners." The number, structure, and composition of the committee have met the requirements stipulated in the Integrated Governance Committee Charter.

The composition of the BNI Integrated Governance Committee members throughout 2024 is as follows:

January 1, 2024 – December 31, 2024 Period

Name	Position	Term of Office	Period	Position in Main Entity and Subsidiary Company
Pradjoto	Chairman	October 30, 2023 - present	First	President Commissioner/ Independent Commissioner of Main Entity
Askolani	Member	March 10, 2020 - present	Second	Commissioner of Main Entity
Robertus Billitea	Member	September 21, 2023 - present	First	Commissioner of Main Entity
Mohamad Yusuf Permana [1)]	Member	October 24, 2024 - present	First	Commissioner of Main Entity
Siti Haniatunnisa	Member	October 28, 2022 - present	First	PT BNI Life Insurance Sharia Supervisory Board
Rudy Tandjung [2)]	Member	October 17, 2024 - present	First	Commissioner/Independent Commissioner of PT BNI Sekuritas
Eko Priyo Pratomo	Member	October 28, 2022 - present	First	President Commissioner/ Independent Commissioner of PT BNI Asset Management
Rufina Tinawati Marianto	Member	July 22, 2022 - present	First	Independent Commissioner of PT Bank Hibank Indonesia
Suhartono [3)]	Member	January 19, 2024 - present	First	President Commissioner/Independent Commissioner of PT BNI Multifinance
Nurani Raswindriati	Member	June 1, 2022 - present	Second	Independent Party

[1)] Serving as a Member of the Integrated Governance Committee since October 22, 2024
[2)] Serving as a Member of the Integrated Governance Committee since October 17, 2024
[3)] Serving as a Member of the Integrated Governance Committee since January 19, 2024

Integrated Governance Committee Profiles

Chair of the Integrated Governance Committee

Pradjoto	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/014/DK/2023 dated October 30, 2023
Term of Office	October 30, 2023 - Present
Professional Certication	Certification of Competence in Banking Risk Management Qualification 6 by the Professional Certification Agency of the Banking Professional Certification Institute (LSP LSPP) (2024)
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Member of the Integrated Governance Committee Concurrently Serving as a Commissioner of the EU

Askolani	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/015/DK/2020 dated March 10, 2020
Term of Office	March 10, 2020 - Present
Professional Certication	• Certification of Competence in Banking Risk Management Qualification 6 by the Professional Certification Agency of the Banking Professional Certification Institute (LSP LSPP) (2024) • Certified Governance Oversight Professional (CGOP) Certification by the Professional Certification Agency – Mitra Kalyana Sejahtera (LSP-MKS) (2024)
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Robertus Billitea	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/005/DK/2023 dated September 21, 2023
Term of Office	September21, 2023 - Present
Professional Certication	Certification of Competence in Banking Risk Management Qualification 6 by the Professional Certification Agency of the Banking Professional Certification Institute (LSP LSPP) (2024)
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Mohamad Yusuf Permana [1)]	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/027/DK/2024 dated October 22, 2024
Term of Office	October 22, 2024 - Present
Professional Certication	Certification of Competence in Banking Risk Management Qualification 6 by the Professional Certification Agency of the Banking Professional Certification Institute (LSP LSPP) (2024)
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Member of the Integrated Governance Committee Concurrently Serving as a Commissioner of a Subsidiary Company

Siti Haniatunnisa
Integrated Governance Committee Member

Age
40 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Banten, Indonesia

Education
- Bachelor's Degree in Law from the International Islamic University of Malaysia (IIUM) (2010)
- Master's Degree in Law from Universitas Indonesia (2015)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since December 2022 based on BNI Board of Commissioners Decree No. KEP/021/DK/2022 dated October 28 2022

Term of Office
2023 - Present

Professional Certification and/or Training
- Certified in Risk Governance Professional (CRGP)
- Sharia Supervisor Certification
- LSP MUI Assessor Certification

Work Experience
- Chairman of Syeikh Nawawi Tanara Banten School of Fiqh (STIF SYENTRA) (2016-present)
- Member of PT BRILife DPS (2016-present)
- Member of PT Asuransi Jasindo Syariah DPS (2017-present)
- Member of PT DPLK Muamalat DPS (2018- present)
- Member of PT Bank Muamalat Indonesia DPS (2019-present)
- Member of PT BNI Life Insurance DPS (2020-present)
- DSN-MUI Plenary Member (2021-present)

Concurrent Position
BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- Chairman of the Syeikh Nawawi Tanara Banten School of Fiqh (STIF SYENTRA) (2016-present)
- Member of PT BRILife DPS (2016-present)
- Member of PT Asuransi Jasindo Syariah DPS (2017-present)
- Member of PT DPLK Muamalat DPS (2018- present)
- Member of PT Bank Muamalat Indonesia DPS (2019-present)
- Member of PT BNI Life Insurance DPS (2020-present)
- DSN-MUI Plenary Member (2021-present)

Rudy Tandjung [2)]

Integrated Governance Committee Member

Age
57 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Agricultural Social Economics from Bogor Agricultural University (1991)
- Master of Business and International Finance from Oklahoma City University (1995)

Legal Basis of Appointment
Appointed for the first time as a Member of the Integrated Governance Committee since October 2024 based on the Decree of the Board of Commissioners of PT Bank Negara Indonesia Persero Tbk Number KEP/026/DK/2024

Term of Office
2024 – Present (First Period)

Professional Certification and/or Training
- Level 4 Risk Management Certification, by the Risk Management Certification Body (BSMR)
- Executive Education Programmes Certification, by The INSEAD Education Singapore

Work Experience
- President Commissioner/Independent Commissioner of PT BNI Sekuritas (2024 – present)
- Head of Consumer Banking, PT Bank DBS Indonesia (Nov 2019 – Dec 2023)
- Head of Commercial Banking, PT Bank DBS Indonesia (Sept 2018 – Nov 2019)
- Chief Operating Officer, PT Bank DBS Indonesia (Mar 2015 – Sept 2018)
- Commissioner, PT Kustodian Sentral Efek Indonesia (June 2012 – June 2015)
- Head of Transaction Banking, PT Bank Permata Tbk (Jan 2010 – Mar 2015)
- Treasury and Trade Solutions Sales Head, Citibank Indonesia (July 1996 – Dec 2009)

Concurrent Position
BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- Chair of the Nomination and Remuneration Committee of PT BNI Sekuritas (2024 – present)
- Chair of the Audit Committee of PT BNI Sekuritas (2024 – present)
- Member of the Risk Monitoring Committee of PT BNI Sekuritas (2024 – present)
- Vice Chair of Sports, Indonesian Bankers Association (IBI) (2023 – present)
- Member of Institutional Relations, National Bank Association (PERBANAS) (2020 – present)
- Member of the Banking Committee, Indonesian Employers Association (APINDO) (2019 – present)

Eko Priyo Pratomo

Integrated Governance Committee Member

Age
61 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Mechanical/Aeronautical Engineering from Bandung Institute of Technology (1988)
- Master of Management from IPMI International Business School (1991)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since October 2022 based on BNI Board of Commissioners Decree No. KEP/020/DK/2022 dated October 28, 2023

Term of Office
2022 – Present (First Period)

Professional Certification and/or Training
- Deputy Investment Manager (Financial Services Authority)
- Training Program for Investment Professionals (Institute for Financial Analysis Development)
- Chartered Financial Consultant (Singapore College of Insurance)
- Chartered Life Underwriter (Singapore College of Insurance)
- Certified Governance Oversight Professional (CGOP) Certification by the Professional Certification Agency – Mitra Kalyana Sejahtera (LSP-MKS) (2024)

Work Experience
- President Commissioner/Independent Commissioner of PT BNI Asset Management (April 2022 – present)
- Senior Advisor from PT Mandiri Manajemen Investasi (2019 – 2020)
- Director, CEO, Senior Advisor from PT BNP Paribas AM (1996 – 2018)
- Deputy GM, Marketing Director of PT Graha Buana Cikarang (1995 – 1996)
- Deputy Marketing Manager from PT KSCI - Misui Group (1992 – 1995)
- Lead Engineer from PT IPTN (1988 – 1990)

Concurrent Position
BNI
Member of the Integrated Governance Committee of PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- Chairman of the PT BNI Asset Management Audit Committee
- Chairman of the PT BNI Asset Management Risk Monitoring Committee
- Founder/Guardian of the Syamsi Dhuha Foundation

Rufina Tinawati Marianto
Integrated Governance Committee Member

Age
65 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Bachelor's Degree in Architectural Engineering and Management Economics from UNIKA Parahyangan Bandung (1986)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since July 2022 based on BNI Board of Commissioners Decree No. KEP/012/DK/2022 dated July 22, 2022

Term of Office
2022 – Present (First Period)

Professional Certification and/or Training
- Certified Governance Oversight Professional (CGOP) Certification by the Professional Certification Agency – Mitra Kalyana Sejahtera (LSP-MKS) (2024)
- Certification of Competence in Banking Risk Management Qualification 6 by the Professional Certification Agency of the Banking Professional Certification Institute (LSP LSPP) (2024)

Work Experience
- Commercial Sales & Marketing Support Head at PT Bank OCBC NISP Tbk (2013-2014)
- Executive VP Commercial Business Unit at PT Bank OCBC NISP Tbk (2012-2013)
- Commercial Business Division Head at PT Bank OCBC NISP Tbk (2009-2011)
- General Manager Commercial Jababeka at PT Bank Permata (2003-2006)
- Independent Commissioner at Bank Mayora (2016-present)

Concurrent Position
BNI
Member of the Integrated Governance Committee of PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
Chairman of the Audit Committee of PT Bank Hibank Indonesia

Suhartono [3)]
Integrated Governance Committee Member

Age
67 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Bachelor of Law from Diponegoro University (1982)

Legal Basis of Appointment
Appointed for the first time as a Member of the Integrated Governance Committee since January 2024 based on the Decree of the Board of Commissioners of BNI No. KEP/001/DK/2024 dated January 19, 2024

Term of Office
2024 – Present (First Period)

Professional Certification and/or Training
- Certified Risk Governance Professional (CRGP) by the Risk Management Professional Certification Institute (LSPMR) (2024)
- Professional Certification for Financing Experts for Directors/Commissioners by the Indonesian Financing Professional Certification Agency (LSPPI) (2015 & 2023)

Work Experience
- President Commissioner & Independent Commissioner of PT BNI Multifinance (2023 – present)
- Commissioner of PT Adiprana Sentosa Indovesco (2019)
- Advisor of PT Koperasi Nusa Raya Cipta (2018)
- Commissioner of PT Wahana Inti Narendra (2018)
- President Commissioner of PT Mahesa Altra Sentosa (2018)
- Commissioner of PT Asuransi Astra Buana (2017 – 2018)
- President Director of PT Federal International Finance (2007 – 2017)
- Vice President Director of PT Federal International Finance (2001 – 2007)
- Marketing Director of PT Federal International Finance (1998 – 2001)
- General Marketing Manager of PT Federal International Finance (1997 – 1998)
- Regional Manager of PT Federal International Finance (Central Java, DIY, and East Java Region) (May 1, 1993 – 1997)
- Branch Manager of PT Federal International Finance (Semarang Branch) (1991 – 1993)
- Branch Manager of PT Mitra Pinasthika Mustika/MPM (Malang Branch) (1989 – 1990)
- Marketing Section Head of PT Astra International (Honda Sales Operation Central Java Region) (1983 – 1989)

Concurrent Position
BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- Chair of the Audit Committee of BNI Finance
- Chair of the Risk Monitoring Committee of BNI Finance
- Member of the Nomination & Remuneration Committee of BNI Finance

Member of Integrated Governance Committee from Independent Party

Nurani Raswindriati
Integrated Governance Committee Member

Age
62 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's Degree in Accounting from Universitas Padjadjaran (1986)
- Masters in Management, Department of Finance from Universitas Gadjah Mada (2005)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee on June 1, 2022 based on Board of Commissioners Decree No. KEP/010/DK/2022 dated 1 June 2022

Term of Office
- 2022 – 2024 (First Period)
- 2024 – Present (Second Period)

Professional Certification and/or Training
- Level 4 Risk Management Certification
- Sharia Banking Basics Certification
- Certified Governance Oversight Professional (CGOP) Professional Competency Certification by the Professional Certification Institute – Mitra Kalyana Sejahtera (LSP-MKS) (2024)

Work Experience
- Director of Finance and Operations at PT Niaga International Factors (2002-2005)
- Credit Risk Control Leader, Risk Management Group at PT Bank Permata Tbk (2007-2012)
- Senior Vice President at the Deposit Insurance Corporation/ LPS (2012-2015)
- Member of the Risk Monitoring Committee at Bank Resonia Perdania
- Member of the Risk Monitoring Committee at PT Bank Tabungan Negara (2015-2016)
- Director of Compliance and Risk Management at PT Bank Victoria Syariah (2016 –2021)
- Senior Vice President Indonesia at Eximbank (2021)
- Independent Member of the Risk Monitoring Committee at PT Bank Negara Indonesia (Persero) Tbk (2021-2022)
- Independent Member of the Integrated Governance Committee at PT Bank Negara Indonesia (Persero) Tbk (2022-present)

Concurrent Position
No concurrent positions internally or externally

[1] Serving as a Member of the Integrated Governance Committee since October 22, 2024
[2] Serving as a Member of the Integrated Governance Committee since October 17, 2024
[3] Serving as a Member of the Integrated Governance Committee since January 19, 2024

Qualifications, Education, and Work Experience of the Integrated Governance Committee

All members of the BNI Integrated Governance Committee have met the individual requirements criteria both in general and specifically as stipulated in the Integrated Governance Committee Charter, namely as follows:

A. General Requirements
   1) Have integrity, good character and morals and sufficient work experience related to the committee's duties;
   2) Have no personal interests/connections that can have a negative impact and conflict of interest on Financial Services Institutions in the BNI Financial Conglomerate.

B. Competency Requirements
   1) Have adequate educational background, skills, knowledge and experience in banking or other financial services institutions;
   2) Be able to work together, have good and effective communication skills, and provide sufficient time to carry out their duties;
   3) Have sufficient knowledge and understanding of the principles and processes of implementing GCG in general, as well as laws and regulations in the banking sector and other financial services institutions, especially those related to the operational activities of banking and other financial services institutions.

With reference to the provisions above, the Bank ensures that the current chairman and all members of the Integrated Governance Committee have met the educational qualification and work experience criteria as explained in the table below:

Qualifications, Education, and Work Experience of the Integrated Governance Committee

Name	Position	Education	Work Experience	Areas of Expertise
Pradjoto	Chairman	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Law • Economy
Askolani	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Law • Economy
Robertus Billitea	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Law • Economy
Mohamad Yusuf Permana [1)]	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Economy • Management
Siti Haniatunnisa	Member of Subsidiary Company	• Bachelor Degree in Law from International Islamic University of Malaysia (IIUM) (2010) • Master Degree in Law from Universitas Indonesia (2015)	Chair of Sheikh Nawawi Banten University, Member of the Sharia Supervisory Board (DPS) of PT BRILife, Member of the Sharia Supervisory Board (DPS) of PT Asuransi Jasindo Syariah, Member of the Sharia Supervisory Board (DPS) of PT DPLK Muamalat, Member of the Sharia Supervisory Board (DPS) of PT Bank Muamalat Indonesia, Member of the Sharia Supervisory Board (DPS) of PT BNI Life Insurance, Member of the Plenary Board of DSN-MUI.	• Law • Ekonomi Syariah
Rudy Tandjung [2)]	Member of Subsidiary Company	• Bachelor Degree in Agricultural Social Economics from Bogor Agricultural University (1991) • Master Degree in Business and International Finance from Oklahoma City University (1994)	President Commissioner/ Independent Commissioner of PT BNI Sekuritas, Head of Consumer Banking at PT Bank DBS Indonesia, Head of Commercial Banking at PT Bank DBS Indonesia, Chief Operating Officer at PT Bank DBS Indonesia, Commissioner of PT Kustodian Sentral Efek Indonesia, Head of Transaction Banking at PT Bank Permata Tbk, and Treasury and Trade Solutions Sales Head at Citibank Indonesia.	• Economy • Capital Market
Eko Priyo Pratomo	Member of Subsidiary Company	• Bachelor's Degree in Mechanical/Aeronautical Engineering from Bandung Institute of Technology (1988) • Master of Management from IPMI Indonesia Business School (1991)	President Commissioner/Independent Commissioner of PT BNI Asset Management, Senior Advisor of PT Mandiri Manajemen Investasi, Director, CEO, Senior Advisor of PT BNP Paribas AM, Deputy GM, Marketing Director of PT Graha Buana Cikarang, Deputy Marketing Manager of PT KSCI - Misui Group, and Lead Engineer of PT IPTN.	• Mutual Funds • Capital Markets • Finance • Economy
Rufina Tinawati Marianto	Member of Subsidiary Company	Bachelor's Degree in Architecture and Management Economics from UNIKA Parahyangan Bandung (1986)	Commercial & Marketing Support Head at PT Bank OCBC NISP Tbk, Executive VP of the Commercial Business Unit at PT Bank OCBC NISP Tbk, Commercial Business Division Head at PT Bank OCBC NISP Tbk, General Manager of Commercial Jababeka at PT Bank Permata, Independent Commissioner of PT Bank Hibank Indonesia.	• Economy • Banking

Name	Position	Education	Work Experience	Areas of Expertise
Suhartono [3]	Member of Subsidiary Company Independent Member	Bachelor Degree in Law from Diponegoro University, Central Java (1982)	President Commissioner & Independent Commissioner of PT BNI Multifinance, Commissioner of PT Adiprana Sentosa Indovesco, Advisor of PT Koperasi Nusa Raya Cipta, Commissioner of PT Wahana Inti Narendra, President Commissioner of PT Mahesa Altra Sentosa, Commissioner of PT Asuransi Astra Buana, President Director of PT Federal International Finance, Vice President Director of PT Federal International Finance, and Marketing Director of PT Federal International Finance.	• Law • Economics • Financing • Human Resources
Nurani Raswindriati	Independent Member	• Bachelor's Degree in Accounting from Padjadjaran University (1986) • Master of Management in Finance from Gadjah Mada University (2005)	Finance and Operations Director of PT Niaga International Factors, Head of Credit Risk Control, Risk Management Group at PT Bank Permata Tbk, Senior Vice President at the Deposit Insurance Corporation (LPS), Member of the Risk Monitoring Committee of Bank Resonia Perdania, Member of the Risk Monitoring Committee of PT Bank Tabungan Negara, Compliance and Risk Management Director of PT Bank Victoria Syariah, Senior Vice President at Indonesia Eximbank, Independent Member of the Risk Monitoring Committee of PT Bank Negara Indonesia (Persero) Tbk, Independent Member of the Integrated Governance Committee of PT Bank Negara Indonesia (Persero) Tbk.	• Finance • Accounting • Risk Management • Economics

[1] Serving as a Member of the Integrated Governance Committee since October 22, 2024
[2] Serving as a Member of the Integrated Governance Committee since October 17, 2024
[3] Serving as a Member of the Integrated Governance Committee since January 19, 2024

Statement of Independence of the Integrated Governance Committee

The Integrated Governance Committee is independent in both the implementation of its duties and in reporting, and is directly responsible to the EU Board of Commissioners. BNI ensures that all members of the Integrated Governance Committee who are independent parties have met the following independence requirements:

1) Are parties outside BNI who do not have financial, management, share ownership and/or family relationships with the Board of Commissioners, Supervisory Board, Board of Directors and/or Controlling Shareholders of Financial Services Institutions in the BNI Financial Conglomerate, or relationships with Financial Services Institutions in the BNI Financial Conglomerate that may affect their ability to act independently. The financial, management, share ownership and/or family relationships referred to are in accordance with the definition set forth in the applicable laws and regulations;
2) Do not have any direct or indirect business relationships related to the business activities of Financial Services Institutions in the BNI Financial Conglomerate.
3) The Committee is required to sign an integrity pact which is a statement and commitment to comply with all provisions of laws and regulations and GCG principles.

By fulfilling all aspects of Independence above, all members of the Integrated Governance Committee are always able to provide fair and balanced assessments of all relevant conditions and are not influenced by personal interests or other parties in expressing their opinions.

Integrated Governance Committee Independency

Name	Independence Aspect				
	No Financial Relationship with the Board of Commissioners and Directors	No Management Relationship with BNI, Subsidiaries, or Affiliate Companies	No Share Ownership Relationship in BNI	No Family Relationship with the Board of Commissioners, Directors, and/or Fellow Members of the Integrated Governance Committee	Not Serving as an Official in Political Parties, Government Officials, or Government
Pradjoto	✓	✓	✓	✓	✓
Askolani	✓	✓	✓	✓	✓
Robertus Billitea	✓	✓	✓	✓	✓
Mohamad Yusuf Permana [1]	✓	✓	✓	✓	✓
Siti Haniatunnisa	✓	✓	✓	✓	✓
Rudy Tandjung [2]	✓	✓	✓	✓	✓
Eko Priyo Pratomo	✓	✓	✓	✓	✓
Rufina Tinawati Marianto	✓	✓	✓	✓	✓
Suhartono [3]	✓	✓	✓	✓	✓
Nurani Raswindriati	✓	✓	✓	✓	✓

[1] Serving as a Member of the Integrated Governance Committee since October 22, 2024
[2] Serving as a Member of the Integrated Governance Committee since October 17, 2024
[3] Serving as a Member of the Integrated Governance Committee since January 19, 2024

Information on Concurrent Positions

As a form of transparency, details on the dual positions held by members of the Integrated Governance Committee are outlined in the following table:

Name	Position in the Bank as EU	Position in Subsidiary Company	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Pradjoto	Chairman & Main Commissioner/ Independent	-	-	-	-
Askolani	Commissioner	-	-	-	-
Robertus Billitea	Commissioner	-	-	-	-
Mohamad Yusuf Permana [1]	Commissioner	-	-	-	-
Siti Haniatunnisa	-	Sharia Supervisory Board (DPS) PT BNI Life Insurance	• DPS PT BRILife • DPS PT DPLK Muamalat • DPS PT Bank Muamalat Indonesia	-	-
Rudy Tandjung [2]	-	President Commissioner/ Independent Commissioner PT BNI Securities	-	-	-
Eko Priyo Pratomo	-	President Commissioner/ Independent Commissioner PT BNI Asset Management	-	-	-
Rufina Tinawati Marianto	-	Independent Commissioner PT Bank Hibank Indonesia	Independent Commissioner PT Bank Hibank Indonesia	-	-
Suhartono [3]	-	President Commissioner/ Independent Commissioner PT BNI Multifinance	-	-	-
Nurani Raswindriati	Independent Member	-	-	-	-

[1] Serving as a Member of the Integrated Governance Committee since October 22, 2024
[2] Serving as a Member of the Integrated Governance Committee since October 17, 2024
[3] Serving as a Member of the Integrated Governance Committee since January 19, 2024

Integrated Governance Committee Meeting

Meeting Implementation Policy

The policies and procedures for conducting the Integrated Governance Meeting, as stipulated in the Integrated Governance Charter, are as follows:

1) The Integrated Governance Committee must hold a meeting at least 1 (one) time in 2 (two) months.
2) The Integrated Governance Meeting can only be held if attended by at least 51% (fifty one per hundred) of the total number of members.
3) The Integrated Governance Committee Meeting is led by the Chairperson of the Integrated Governance Committee or the most senior member of the Integrated Governance Committee if the Chairperson of the Integrated Governance Committee is unable to attend.
4) If deemed necessary, the Integrated Governance Committee may invite other parties related to the agenda/discussion of the meeting to attend the Integrated Governance Committee Meeting.
5) The committee meeting must be attended by each Independent Commissioner from the Financial Services Institution in the BNI Financial Conglomerate who is a member of the Integrated Governance Committee. In the event that the relevant independent Commissioner is unable to attend the Integrated Governance Committee meeting, then another Commissioner who is not a member of the Integrated Governance Committee or an official at the relevant Financial Services Institution may be asked to attend the Integrated Governance Committee meeting by filling in the meeting attendance list, but is not counted in the attendance quorum and the number of votes taken to reach a decision at the meeting.
6) Decisions at the Committee meeting are made based on consensus.
7) In the event that consensus does not occur, decisions are made based on a majority vote. Meeting decisions are considered valid if approved by more than ½ (one half) of the total number of members of the Integrated Governance Committee present. The regulation of the voting rights of Committee members adheres to the principle of 1 (one) person 1 (one) vote.
8) Committee meetings may be held via teleconference, video conference, or other electronic media.
9) The results of the Committee meeting must be stated in the minutes of the meeting signed by all members of the Committee present and properly documented.
10) Dissenting opinions that occur in the meeting are clearly stated in the minutes of the meeting along with the reasons for the differences of opinion.
11) The attendance of Committee members in meetings is reported in the quarterly report and the annual report of the committee.

Frequency and Level of Attendance of Integrated Governance Committee Members in Meetings

Throughout 2024, the Integrated Governance Committee has held 12 (twelve) meetings. The frequency of the meetings has met the provisions stipulated in the Integrated Governance Committee Charter.

The following is data on the attendance of Committee members at Integrated Governance Committee meetings during 2024:

Name	Position	Number of Meetings	Attended	Percentage
Pradjoto	Chairman	12	11	92%
Askolani	Member	12	11	92%
Susyanto [1)]	Member	2	2	100%
Robertus Billitea	Member	12	10	84%
Mohamad Yusuf Permana [2)]	Member	3	3	100%
Parikesit Suprapto [3)]	Member	6	6	100%
Siti Haniatunnisa	Member	12	11	92%
Rudy Tandjung [4)]	Member	3	3	100%
Eko Priyo Pratomo	Member	12	12	100%
Suhartono [5)]	Member	12	9	75%
Rufina Tinawati Marianto	Member	12	11	92%
Nurani Raswindriati	Independent Member	12	12	100%

[1)] Ceased to serve as a Member of the Integrated Governance Committee since March 4, 2024
[2)] Serving as a Member of the Integrated Governance Committee since October 22, 2024
[3)] Ceased to serve as a Member of the Integrated Governance Committee since July 5, 2024
[4)] Serving as a Member of the Integrated Governance Committee since October 17, 2024
[5)] Serving as a Member of the Integrated Governance Committee since January 19, 2024

Meeting Agenda

The agenda for the Integrated Governance Committee meetings throughout 2024 is as follows:

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
1	January 23, 2024	1. Integrated Financial Performance Evaluation - December 2023 2. 2023 Synergy Evaluation: Parent Company and Subsidiaries & Among Subsidiaries 3. Strategic Plan & Business Plan for Subsidiaries - 2024 4. 2024 Synergy Plan: Parent Company and Subsidiaries & Among Subsidiaries	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Susyanto (Commissioner of BNI) 4. Parikesit Suprapto (President Commissioner/ Independent Commissioner of BNI Life Insurance) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 7. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 8. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: • Finance Director o/Head of Bank Hibank Indonesia • Network & Services Director /Head of BNI Life Insurance • Enterprise & Commercial Banking Director /Head of BNI Multifinance • Technology & Operations Director o/Head of BNI Ventura 2) BNI Divisions: • Subsidiaries Management Division • Corporate Planning & Performance Management Division
2	February 13, 2024	1. Integrated Risk Profile Evaluation and Integrated KPMM for the Second Semester of 2023 2. Evaluation of self-assessment results on Integrated Governance for the Second Semester of 2023 3. Integrated Governance for the Second Semester of 2023	1. Susyanto (Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Parikesit Suprapto (President Commissioner/ Independent Commissioner of BNI Life Insurance) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 7. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 8. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 9. Nurani Raswindriati (Independent Party)	1. Risk Monitoring Committee: • Erwin Rijanto Slamet (Independent Commissioner of BNI) • Pahala Nugraha Mansury (Vice President Commissioner of BNI) • Septian Hario Seto (Commissioner of BNI) • Fadlansyah Lubis (Commissioner of BNI) • Bambang Setyogroho (Independent Party) • Dwita Suherlina (Independent Party) 2. BNI Board of Directors: • Risk Management Director • Human Capital and Compliance Director 3. BNI Divisions: • Enterprise Risk Management Division • Compliance Division • Subsidiaries Management Division
3	March 26, 2024	1. Evaluation of the Effectiveness of the Integrated Internal Control System (SPI) for the Second Semester of 2023 2. Evaluation of the Effectiveness of the Integrated Audit Unit for the Second Semester of 2023 3. Improvement of the Quality and Quantity of Auditors in Subsidiaries 4. Results of Internal Audits of Subsidiaries and their Follow-up Actions	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Parikesit Suprapto (President Commissioner/ Independent Commissioner of BNI Life Insurance) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 7. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 8. Nurani Raswindriati (Independent Party)	1. BNI Board of Directors: • Vice President Director • Enterprise and Commercial Banking Director 2. BNI Divisions: Internal Audit Division and Subsidiaries Management Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
4	April 30, 2024	1. Financial Performance of Subsidiaries including the realization of Synergy with the Parent Entity and among Subsidiaries for the First Quarter of 2024 2. Issues in each Subsidiary regarding the evaluation results of Risk Management, Compliance, and Audit implementation for the First Quarter of 2024	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Parikesit Suprapto (President Commissioner/ Independent Commissioner of BNI Life Insurance) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 7. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 8. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: • Finance Director • Digital and Integrated Transaction Banking Director BNI - Head of Bank Hibank Indonesia 2) BNI Divisions: • Subsidiaries Management Division • Corporate Planning & Performance Management Division
5	May 14, 2024	Evaluation of the Effectiveness of the Implementation of Anti-Fraud Strategies and Whistle Blowing System (WBS) in the BNI Financial Conglomerate for the Second Semester of 2023	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Parikesit Suprapto (President Commissioner/ Independent Commissioner of BNI Life Insurance) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 7. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 8. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: Risk Management Director 2) BNI Divisions: Anti-Fraud Unit Internal Audit Subsidiaries Management Division
6	June 11, 2024	Evaluation of the Implementation of Integrated Compliance Functions and Anti-Money Laundering – Prevention of Terrorism Financing in each Subsidiary for the Second Semester of 2023	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Parikesit Suprapto (President Commissioner/ Independent Commissioner of BNI Life Insurance) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 7. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 8. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 9. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: Human Capital & Compliance Director 2) BNI Divisions: Compliance Division Subsidiaries Management Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
7	July 19, 2024	1. Financial Performance of Subsidiaries including the realization of Synergy with the Parent Entity and among Subsidiaries for the Second Quarter of 2024 2. Issues in each Subsidiary regarding the evaluation results of Risk Management, Compliance, and Audit implementation for the Second Quarter of 2024	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 3. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 4. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 5. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 6. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: • Finance Director • Retail Banking Director - Head of BNI Finance • Technology & Operations Director - Head of BNI Ventura • Wholesale & International Banking Director - Head of BNIS, BNIAM, BSPL, and BNI Remittance • Digital and Integrated Transaction Banking Director - Head of Bank Hibank 2) BNI Divisions: • Subsidiaries Management Division • Corporate Planning & Performance Management Division
8	06 August 2024	1. Evaluation of the Integrated Risk Profile and Minimum Capital Requirement (KPMM) for the First Semester of 2024 2. Evaluation of self-assessment results on Integrated Governance for the First Semester of 2024	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 5. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 6. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 7. Nurani Raswindriati (Independent Party)	1) Risk Monitoring Committee: • Erwin Rijanto Slamet (Independent Commissioner of BNI) • Pahala Nugraha Mansury (Vice President Commissioner of BNI) • Fadlansyah Lubis (Commissioner of BNI) • Dwita Suherlina (Independent Party) 2) BNI Board of Directors: • Risk Management Director • Human Capital and Compliance Director BNI Divisions: 3) Enterprise Risk Management Division,Compliance Division, Subsidiaries Management Division
9	September 17, 2024	1. Evaluation of the Effectiveness of the Integrated Internal Control System for the First Semester of 2024, including Results of Internal Audits of Subsidiaries and Follow-up Actions 2. Effectiveness of the Integrated Audit Unit, including Improvement of the Quality and Quantity of Auditors in Subsidiaries.	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 5. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI Asset Management) 6. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 7. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 8. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: Vice President Director 2) BNI Divisions: Internal Audit Division Subsidiaries Management Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
10	October 22, 2024	1. Financial Performance of Subsidiaries including the realization of Synergy with the Parent Entity and among Subsidiaries for the Third Quarter of 2024 2. Issues in each Subsidiary regarding the evaluation results of Risk Management, Compliance, and Audit implementation for the Third Quarter of 2024	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Mohamad Yusuf Permana (Commissioner of BNI) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Securities) 7. Eko Priyo Pratomo (President Commissioner/Independent Commissioner of BNI Asset Management) 8. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 9. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 10. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: • Finance Director • Retail Banking Director - Head of BNI Finance • Network & Services Director - Head of BNI Life Insurance • Digital and Integrated Transaction Banking Director - Head of Bank Hibank 2) BNI Divisions: Subsidiaries Management Division, Corporate Planning & Performance Management Division
11	November 12, 2024	Evaluation of the Integrated Governance Guidelines of BNI for 2024	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Mohamad Yusuf Permana (Commissioner of BNI) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Securities) 7. Eko Priyo Pratomo (President Commissioner/Independent Commissioner of BNI Asset Management) 8. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 9. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 10. Nurani Raswindriati (Independent Party)	1) BNI Board of Directors: Human Capital and Compliance Director 2) BNI Divisions: Compliance Division, Enterprise Risk Management Division, Anti-Fraud Unit, Internal Audit, and Subsidiaries Management Division
12	November 12, 2024	Work Plan of the Integrated Governance Committee of BNI for 2025	1. Pradjoto (President Commissioner/ Independent Commissioner of BNI) 2. Askolani (Commissioner of BNI) 3. Robertus Billitea (Commissioner of BNI) 4. Mohamad Yusuf Permana (Commissioner of BNI) 5. Siti Haniatunnisa (Sharia Supervisory Board of BNI Life Insurance) 6. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Securities) 7. Eko Priyo Pratomo (President Commissioner/Independent Commissioner of BNI Asset Management) 8. Suhartono (President Commissioner/ Independent Commissioner of BNI Finance) 9. Rufina Tinawati Marianto (Independent Commissioner of PT Bank Hibank Indonesia) 10. Nurani Raswindriati (Independent Party)	-

Integrated Governance Committee Member Competency Improvement Program in 2024

In 2024, members of the Integrated Governance Committee participated in the following education or training:

Training//Workshop/ Conference/Seminar	Date of Implementation	Venue	Type of Education	Organizer
Pradjoto – Committee Chairman - President Commissioner/Independent Commissioner				
Competency development/training can be seen in the BNI Board of Commissioners competency development/training section.				
Askolani – Committee Member - Commissioner				
Competency development/training can be seen in the BNI Board of Commissioners competency development/training section.				
Robertus Billitea – Committee Member - Commissioner				
Competency development/training can be seen in the BNI Board of Commissioners competency development/training section.				
Mohamad Yusuf Permana[1)] – Committee Member - Commissioner				
Competency development/training can be seen in the BNI Board of Commissioners competency development/training section.				
Siti Haniatunnisa – Committee Member - Sharia Supervisory Board of PT BNI Life Insurance				
Workshop on Pre Ijtima'Sanawi (Annual Meeting) of Sharia Supervisory Board IX in 2024 in insurance sector	September 13, 2024	Jakarta	Training	DSN-MUI
Sharia Supervisory Board Workshop "Opportunities and Challenges of Today's Insurance Sharia Supervisory Board"	August 12-13, 2024	Bandung	Training	AASI
Workshop Pre Ijtima' Sanawi (Annual Meeting) DPS IX in 2024 on Islamic Commercial Banks and Islamic Business Units	September 11, 2024	Jakarta	Training	DSN-MUI
Developing Financial Contigency Plan "Smart Steps to Face Uncertainty"	October 29-30, 2024	Jakarta	Seminar	GRC Management
Rudy Tandjung[2)] – Committee Member - President Commissioner/Independent Commissioner of PT BNI Sekuritas				
Compliance Forum - Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Workshop	BNI
Commemoration of World Anti-Corruption Day (Hakordia) OJK 2024	December 17, 2024	Jakarta		OJK
Eko Priyo Pratomo – Committee Member - President Commissioner/Independent Commissioner of PT BNI Asset Management				
Masterclass Corporate Governance - Governance Risk Management Compliance Sustainability	August 12-13, 2024	Jakarta	Certification	Center for Risk Management & Sustainability
Suhartono[3)] – Committee Member - President Commissioner and Independent Commissioner of PT BNI Multifinance				
National Certification "Integrated Risk Governance Expert/Certified Risk Governance Professional (CRGP)"	September 17-18, 2024	Jakarta	Certification	RAP Learning Center
APPI National Seminar "Financing Challenges Amidst Geopolitical and Economic Changes"	June 4, 2024	Jakarta	Seminar	Asosiasi Perusahaan Pembiayaan Indonesia (APPI)
Compliance Forum - Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Workshop	BNI
Rufina Tinawati Marianto – Committee Member - Independent Commissioner of PT Bank Hibank Indonesia				
Socialization of LHKPN Filling	February 19, 2024	Jakarta	Training	BNI
Risk Management Refreshment (J6)	February 20, 2024	Jakarta	Certification	Hibank
Knowledge Sharing "Strategy to Prevent Cyber Crime"	February 29, 2024	Jakarta	Training	OJK

Training//Workshop/ Conference/Seminar	Date of Implementation	Venue	Type of Education	Organizer
Webinar "Opportunities and Challenges of Digital Assets in Indonesia"	March 14, 2024	Jakarta	Training	OJK
Webinar "Paylater: Financial Solution or Source of New Problems?"	April 26, 2024	Jakarta	Training	LPPI
Anti Fraud Awareness Webinar "Avoid Online Gambling and Illegal Online Loans"	May 22 & May 31, 2024	Jakarta	Training	BNI
PDP Series 1 Socialization Data Privacy and Data Protection Awareness Training	May 28, 2024	Jakarta	Training	Hibank
"Anti Fraud Awareness Webinar: Avoid Online Gambling"	June 7, 2024	Jakarta	Training	BNI
Masterclass Corporate Governance - Governance Risk Management Compliance Sustainability	August 12 -13, 2024	Jakarta	Certification	Center for Risk Management & Sustainability
Socialization of Increasing Nationalism Values	August 16, 2024	Jakarta	Training	Hibank
Webinar OJK "How to Prevent Money Laundering and Terrorism Financing"	September 5, 2024	Jakarta	Training	OJK
Nurani Raswindriati – Committee Member - Independent Party				
Masterclass Corporate Governance - Governance Risk Management Compliance Sustainability	August 12 -13, 2024	Jakarta	Certification	Center for Risk Management & Sustainability
Compliance Forum - Realizing an Anti-Corruption Culture through the Cultivation of Integrity Values	August 14, 2024	Jakarta	Training	BNI

[1] Served as Member of Integrated Governance Committee since October 22, 2024
[2] Served as Member of Integrated Governance Committee since October 17, 2024
[3] Served as Member of Integrated Governance Committee since January 19, 2024

Brief Report on the Implementation of Integrated Governance Committee Activities in 2024

In 2024, the Integrated Governance Committee implemented all programs/Work Plans that had been set at the beginning of 2024 to support the supervisory duties of the Board of Commissioners. The Integrated Governance Committee has submitted a report on each implementation of its duties accompanied by recommendations to the EU Board of Commissioners signed by the Chairperson of the Integrated Governance Committee and Committee Members. The following are the strategic steps taken in 2024:

1. Improving the quality of the implementation of the integrated compliance function by conducting a self-assessment of the implementation of the compliance culture in each BNI Subsidiary Company, evaluating the implementation of anti-fraud strategies, and the Whistleblowing System, Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of the Proliferation of Weapons of Mass Destruction (APUPPP-PPPSPM) in the BNI financial conglomerate, and evaluating the implementation of the integrated compliance function.
2. Improve the quality of integrated internal control by ensuring the quality and number of auditors in the Subsidiary are adequate, evaluate the effectiveness of the integrated internal control system, and evaluate the results of the Subsidiary's internal audit and its follow-up.
3. Improve the quality of the implementation of integrated risk management by monitoring the action plan, improving root causes in integrated risk management, evaluating the integrated risk profile and the Quality of the Implementation of Integrated Risk Management (KPMR), and reviewing the General Policy for Integrated Risk Management.
4. Maintain the quality of the implementation of Integrated Governance by evaluating the structure, process and results of integrated governance, reviewing and evaluating the Integrated Governance Guidelines, and increasing knowledge of best practices for implementing integrated governance.
5. Monitor the effectiveness of the results of integrated governance by evaluating integrated financial performance, as well as evaluating the synergy plan between BNI and Subsidiaries and synergy between Subsidiaries

Based on the strategy and work program of the Integrated Governance Committee, the activities/ duties of the Integrated Governance Committee are carried out through the following mechanisms:

1. Implementation of the Integrated Governance Committee Meeting including inviting the relevant Directors, related divisions/units;

2. Attending the Board of Commissioners Meeting and the Board of Commissioners together with the Board of Directors in the agenda related to the implementation of the Integrated Governance Committee's duties;
3. Review/evaluation/review outside the meeting forum.

The results of the Integrated Governance Committee Meeting and monitoring, review/evaluation/review of the Integrated Governance Committee are submitted to the Board of Commissioners as a report and recommendation both in writing and in the Board of Commissioners Meeting forum, and the Integrated Governance Committee also submits suggestions, opinions, and recommendations from the implementation of the Integrated Governance Committee Meeting in writing to the Board of Directors for follow-up. During 2024, the Integrated Governance Committee has held 12 (twelve) meetings, by discussing and discussing 24 (twenty-four) meeting agendas.

The implementation of the Integrated Governance Committee activities generally includes the following:

1. Reviewing and discussing the performance of Subsidiaries and the Subsidiary development strategy in line with the vision of PT Bank Negara Indonesia (Persero) Tbk to become a financial institution that excels in service and performance, including evaluating the Integrated Financial Performance Evaluation of December 2023 and Synergy in 2023: Parent Company and Subsidiaries & Between Subsidiaries, as well as discussing the Strategic & Business Plan of Subsidiaries in 2024 and the Synergy Plan in 2024: Parent Company and Subsidiaries & Between Subsidiaries;
2. Encouraging and providing suggestions for improving the implementation of synergy of Subsidiaries as part of the BNI Group, including synergy in financing cooperation, information sharing, information and technology, human resources, exploration of prospective new products and optimization of business opportunities from PT Bank Negara Indonesia (Persero) Tbk as the Parent Company;
3. Encouraging acceleration and provide suggestions so that Subsidiaries in the BNI Financial Conglomerate can continue to increase positive contributions that have an impact on the profitability of the BNI Financial Conglomerate, of course accompanied by adequate risk management and internal control, fulfillment of quality human resources, and Good Governance;
4. Discussing and recommending the resolution of Governance problems that occur in Subsidiaries, including improvements to the implementation of integrated compliance functions in building a culture of compliance in each Subsidiary;
5. Evaluating and providing recommendations to the Board of Commissioners on the implementation of Integrated Governance including evaluation of the adequacy of integrated internal control; evaluation of the implementation of integrated compliance functions; implementation of integrated risk management; implementation of the Integrated Governance Guidelines, and achievement of Subsidiary Company performance;
6. Evaluating and providing recommendations for the Integrated Governance Guidelines for the BNI Financial Conglomerate for the 2024 period;
7. Evaluating the effectiveness and provide advice on the implementation of the Anti-Fraud Strategy, Whistleblowing System, and Implementation of Anti-Money Laundering, Prevention of Terrorism Funding, and Prevention of Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM) in all members of the BNI Financial Conglomerate;
8. Reviewing and recommending updates to the Integrated Governance Policy, Integrated Risk Management General Policy and Integrated Capital Management Policy;
9. Evaluating and providing advice on the adequacy of the methodology and problems of integrated internal control based on the audit results of the Main Entity and Subsidiaries, including evaluations of improvements in the quality and number of Auditors in Subsidiaries, the effectiveness of the Integrated Internal Control System (SPI) Semester II of 2023 & Semester I of 2024, to the Results of the Internal Audit of Subsidiaries and their follow-up;
10. Conducting evaluations and providing suggestions for the preparation of the Integrated Risk Profile and Integrated KPMR for Semester II of 2023 and Semester I of 2024, integrated risk appetite, and limits for all integrated exposures;
11. Reviewing and ensuring that the Integrated Governance Report to the Financial Services Authority has identified the strengths and weaknesses of the implementation of Integrated Governance through the Evaluation of the Structure, Process, and Results (SPH) of Integrated Governance Semester II/2023 & and Semester I/2024, and ensure that an action plan/improvement steps have been made for any weaknesses;
12. Conducting monthly and/or quarterly evaluations, reviews and monitoring of the financial performance and performance of Subsidiaries in order to achieve business targets as one of the results of Integrated Governance;

13. Monitoring and ensuring that the findings of the OJK and internal audits at the Main Entity and Subsidiaries have been followed up and provide suggestions for improvements related to human resources, database needs, completeness of regulations including those related to conflicts of interest at Subsidiaries;
14. Preparing Integrated Governance Implementation Evaluation report along with recommendations for improvements to the Board of Commissioners;
15. Reviewing the effectiveness and providing recommendations to the Board of Commissioners on integrated internal control and audit results at Subsidiaries;
16. Reviewing and updating the Integrated Governance Committee Charter in accordance with the development of the implementation of the Integrated Governance Committee's duties;
17. Reporting the implementation of the Integrated Governance Committee's duties every quarter to the Board of Commissioners; and
18. Preparing Integrated Governance Committee's work program for 2025.

Integrated Governance Committee Evaluation of the Implementation of Integrated Governance of BNI Financial Conglomerate

The Integrated Governance Committee has conducted an evaluation and assessment of the implementation of Integrated Governance in BNI Financial Conglomerate, including in terms of the adequacy of internal control, risk management, capital level and implementation of integrated compliance functions in 2024. The Integrated Governance Committee generally assesses that all of these things are running well and in line with applicable regulations regarding the implementation of Integrated Governance for Financial Conglomerates in Indonesia, and in accordance with the size and complexity of BNI Financial Conglomerate. This means that BNI Financial Conglomerate has implemented integrated Governance as a whole and the implementation of Integrated Governance principles has been adequate.

Integrated Governance Committee Work Plan for 2025

The Integrated Governance Committee has set a work plan for 2025 with the following strategic priorities:

1) Encourage increased achievement of integrated governance through evaluation of the effectiveness of company guidelines, monitoring financial performance achievement, improving the quality of integrated compliance functions and APU PPT and PPPSPM, and Improving the Quality of Integrated Risk Management Implementation;
2) Improve the quality of integrated internal control and integrated audit, through evaluation of the results of self-assessment of the implementation of the integrated internal control system for the semester period, evaluation of the implementation of integrated internal audit, and evaluation of the results of the internal audit of the Subsidiary Company and its follow-up;
3) Improve the effectiveness of the performance of the Integrated Governance CommitteeImprove the effectiveness of the performance of the Integrated Governance Committee

Remuneration of Members of the Integrated Governance Committee [ACGS C.3.4]

The remuneration policy for members of the Integrated Governance Committee who are part of the Board of Commissioners of the Parent Entity, the Board of Commissioners of Subsidiaries, and the Sharia Supervisory Board of Subsidiaries is integrated with the honorarium provided to the Board of Commissioners and/or the Sharia Supervisory Board of Subsidiaries, with no special honorarium allocated to individual committee members. Meanwhile, the honorarium for independent (Non-Commissioner) committee members is determined by the Board of Commissioners, with a maximum amount set at 20% of the President Director's salary, and no additional income beyond this honorarium is provided. This policy aligns with the provisions of Minister of SOEs Regulation No. PER-3/MBU/03/2023 dated March 20, 2023, concerning the Organization and Human Resources of State-Owned Enterprises.

Supporting Organs of the Board of Commissioners

In order to increase the effectiveness of the supervisory function and provide advice to the Board of Directors, the Board of Commissioners is given the authority to form a number of supporting organs under it, such as the Secretary to the Board of Commissioners. The formation of supporting organs under the Board of Commissioners has considered the provisions of laws and regulations that apply to public companies, the banking sector, and SOE.

Secretary of the Board of Commissioners

The Secretary of the Board of Commissioners is a supporting organ who is appointed and dismissed directly by the Board of Commissioners based on the Decree of the Board of Commissioners and is directly responsible to the Board of Commissioners. The party who serves as Secretary to the Board of Commissioners comes from outside the Bank and is tasked with overseeing the Secretariat of the BNI Board of Commissioners. The Secretariat of the Board of Commissioners was formed and is tasked with assisting and supporting the smooth running of the activities and duties of the Board of Commissioners. In carrying out its duties, the Secretary of the Board of Commissioners is assisted by Secretary of the Board of Commissioners staff who come from outside the Bank and staff who come from within the Bank.

Legal Basis for Establishment

The formation and existence of the Secretary of the Board of Commissioners organ in BNI's governance structure refer to Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 dated March 20, 2023 concerning Organs and Human Resources of State-Owned Enterprises, which regulates the Secretariat of the Board of Commissioners and the staff of the Secretary of the Board of Commissioners.

Work Guidelines and Procedures

In carrying out secretarial duties and responsibilities, the Secretary of the Board of Commissioners and staff are required to comply with the Guidelines and Procedures and Regulations of the Secretariat of the Board of Commissioners, which have been stipulated in the Board of Commissioners Decree No. KEP/041/DK/2017 dated September 28, 2017, concerning Guidelines and Procedures for the Secretariat of the Board of Commissioners. In general, the charter regulates the following matters:

1) Appointment and Position of Secretary to the Board of Commissioners;
2) Term of Office of the Secretary to the Board of Commissioners, who is from outside the bank, and the Board of Commissioners' Secretariat Staff;
3) Requirements for Secretary to the Board of Commissioners;
4) Remuneration of the Secretary to the Board of Commissioners, who is from outside the bank, and the Board of Commissioners' Secretariat Staff;
5) Duties of the Secretariat and Secretary to the Board of Commissioners;
6) Access to and confidentiality of information;
7) Working time of the Secretary to the Board of Commissioners, who is from outside the bank, and the Board of Commissioners' Secretariat Staff;
8) Performance assessment of the Board of Commissioners Secretariat;
9) Prohibition of concurrent positions;
10) Mechanism for Coordinating the Board of Commissioners' Secretariat with the Corporate Secretary and committees under the Board of Commissioners.

Profile of the Secretary of the Board of Commissioners

The Secretary of the BNI Board of Commissioners is appointed and is directly responsible to the Board of Commissioners, assisted by a member of the Board of Commissioners Secretariat staff. In accordance with the Decree of the Board of Commissioners No. KEP/015/DK/2019 dated October 24, 2019, the Board of Commissioners appointed Anas Puji Istanto as Secretary of the BNI Board of Commissioners.



Anas Puji Istanto
Secretary to the BNI Board of Commissioners

Age
38 years old, as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's degree in Law from Universitas Gadjah Mada (2008)
- Master's degree in Business Law from Universitas Gadjah Mada (2014)
- Doctorate degree in Law from Universitas Gadjah Mada (2024)

Legal Basis of Appointment
Appointed for the first time as Secretary of the Board of Commissioners based on the Board of Commissioners Decree No. KEP/015/DK/2019
dated October 24, 2019

Term of Office
2019 - Present

Certification and/or Training
- Qualified Risk Governance Professional Exam Preparation Education and Training by Center For Risk Management & Sustainability (CRMS) (2024)
- Risk Governance Supervision Certification/Qualified Risk Governance Professional (QRGP) by Professional Certification Institute - Mitra Kalyana Sejahtera (LSP MKS) (2024)

Work Experience
- Staff of the Board of Commissioners of PT Perkebunan Nusantara XII (Persero) (2012-2014)
- Staff of the Board of Commissioners of PT Bank Mandiri (Persero) Tbk (2014-2017)
- Head of Sub-Division of Legislative Regulations I – SOE Ministry (2014-2017)
- Secretary of the Supervisory Board of the SOE Legal Forum (2017-present)
- Secretary to the Board of Commissioners of PT Jasa Marga (Persero) Tbk (2017-2019)
- Head of Legal Services Sub Division IIb – SOE Ministry (2017-2019)
- Head of Legal Services I - SOE Ministry (2019-2020)
- Coordinator Corporate Law I - SOE Ministry (2020-2024)
- Acting Assistant Deputy for Legislation (2024- present) (2024-present)
- Secretary to the Board of Commissioners at PT Bank Negara Indonesia (Persero) Tbk (2019-present)
- Secretary of the Nomination and Remuneration Committee at PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Concurrent Position
- Acting Assistant Deputy for Laws and Regulations (2024-current)
- Secretary of BNI Nomination and Remuneration Committee (2020-present)
- Vice Chairman V KAHGAMA (2023-present)
- Secretary of the Supervisory Board of the SOE Law Forum (2017- present)

Secretary of The Board of Commissioners Requirements

The Secretary of the Board of Commissioners shall fulfill the following requirements:
1) Understand SOE management, monitoring, and development systems;
2) Has good integrity;
3) Understands the secretariat function;
4) Has the ability to communicate and coordinate properly;
5) Has sufficient time to perform the duties at the Bank.

Secretary of The Board of Commissioners Duties and Responsibilities

The Secretary to the Board of Commissioners Duties and Responsibilities include:
1) Coordinating the Board of Commissioners Secretariat duties in performing the following duties:
   a. Preparing meetings, including briefing sheets for the Board of Commissioners;
   b. Preparing minutes of the Board of Commissioners' meeting according to the Bank's Articles of Association, including attending and preparing Minutes of joint meetings of the Board of Commissioners and the Board of Directors;
   c. Administering the Board of Commissioner's documents either incoming letters, outgoing letters, minutes of meetings, or any other documents;
   d. Drafting the Board of Commissioners Work Plan and Budget;
   e. Drafting the Board of Commissioners' Reports.
2) In addition to performing duties stated in number 1 above, the Secretary of the Board of Commissioners as the head of the Board of Commissioners Secretariat performs the following duties:
   a. Ensuring that the Board of Commissioners complies with the laws and regulations and implements Good Corporate Governance principles;
   b. Providing information needed by the Board of Commissioners periodically or at any time when requested;
   c. Coordinating Committee members, if necessary, to ensure the ease of the Board of Commissioners' duties;
   d. Becoming the liaison officer between the Board of Commissioners and other parties;

e. Performing other duties given by the Board of Commissioners, among others but not limited to:
   i. Coordinating the preparation of draft Decrees for the Board of Commissioners;
   ii. Coordinating the studies/reviews required by the Board of Commissioners;
   iii. Accompanying the Board of Commissioners on work visits/official trips to work units within the Company, and coordinating with committees under the Board of Commissioners in preparing the Board of Commissioners reports on the work visits/official trips; and
   iv. Accompanying the Board of Commissioners in meetings with the regulators or the Bank supervisors related to the Board of Commissioners duties and obligations as the Company's supervisor.

3) In the framework of administrative order and good corporate governance implementation, the Board of Commissioners Secretariat must ensure that documents reflect the Board of Commissioners' activities, and are well kept at the Bank.

Secretary of The Board of Commissioners Prohibition of Concurrent Positions

The Secretary and Board of Commissioners Secretariat staff who come from outside the Bank may not concurrently serve as:

1) Members of the Board of Commissioners/ Supervisory Board of another BUMN/Company;
2) Secretary/Staff Secretary to the Board of Commissioners in State-Owned Enterprises (BUMN) or other companies;
3) Other committee members in the Company; and/ or
4) Committee members in BUMN/other companies.

Board of Commissioners Secretary Competency Improvement Program

In 2024, the Secretary of the Board of Commissioners and staff have carried out the following education or training:

Types of Training and Competency Development/Training Materials	Implementation Time	Organizer
Education and Training for Qualified Risk Governance Professional Exam Preparation	August 8-9, 2024	Center For Risk Management & Sustainability (CRMS) (2024)
Risk Governance Supervision Certification/Qualified Risk Governance Professional (QRGP)	September 9, 2024	Professional Certification Institute – Mitra Kalyana Sejahtera (LSP MKS) (2024)

Implementation of the Duties of Secretary of the Board of Commissioners in 2024

In carrying out its role as a supporting organ for the Board of Commissioners, the Secretary of the Board of Commissioners assist and supports the implementation of the duties of the Board of Commissioners by providing information, analysis, and reports required by the Board of Commissioners.

In 2024, the Secretary of the Board of Commissioners has carried out the following duties:

1. Assist in preparing the 2025 Board of Commissioners Work Plan and the 2024 Board of Commissioners Work Plan Realization Report.
2. Assist in the preparation of the draft Report of the Board of Commissioners, which is the obligation of the Board of Commissioners in accordance with applicable regulatory provisions, including:
   a. Reports to the Ministry of SOE RI quarterly;
   b. Report to the Financial Services Authority;
   c. Report to Bank Indonesia;
   d. Board of Commissioners work visit report.
3. Monitor, review, and inform the development of the latest statutory regulations to be submitted to the Board of Commissioners, including the creation, renewal, or adjustment of Board of Commissioners Decrees based on applicable statutory regulations.
4. Coordinate and organize Board of Commissioners Meetings and Joint Board of Commissioners Meetings with the Board of Directors, including preparing meeting schedules and meeting materials, compiling and administering minutes of Board of Commissioners meetings, conveying suggestions and opinions of the Board of Commissioners based on the results of Board of Commissioners meetings to the Board of Directors, and monitoring the follow-up to the Board of Commissioners' suggestions and opinions.

5. Assist and support the implementation of the duties of committees under the Board of Commissioners as part of the duties of the Board of Commissioners based on applicable regulations, including:
   a. Coordinating the division of tasks of committees under the Board of Commissioners;
   b. Coordinate and prepare meetings for committees under the Board of Commissioners, including preparing meeting materials, compiling and administering minutes of meetings, and conveying suggestions and opinions on the results of evaluations and committee meetings to the Board of Commissioners as input;
   c. Monitor the implementation of the Work Plan of committees under the Board of Commissioners; and
   d. Ensure completion of reports from committees under the Board of Commissioners.
6. Carry out administrative duties related to the smooth running of the Board of Commissioner's duties, namely management, storage, and administration of Minutes of Meetings of the Board of Commissioners and Meetings of the Board of Commissioners with the Board of Directors, as well as Minutes of meetings of committees under the Board of Commissioners, documents/correspondence from the Commissioner to the Board of Directors, and other parties, including preparing drafts of approval letters as well as strategic input/suggestions from the Board of Commissioners, which are submitted to the Board of Directors.
7. Accompany work visits/official trips (online) of the Board of Commissioners to work units within the Company at meetings with regulators or bank supervisors related to the duties and obligations of the Board of Commissioners.

Remuneration of the Secretary to the Board of Commissioners [ACGS C.3.4]

The salary of the Secretary to the Board of Commissioners is determined by the Board of Commissioners considering the Bank's financial capabilities. As regulated in the Regulation of the Minister of SOE Number PER-3/MBU/03/2023 dated March 20, 2023 concerning Organs and Human Resources of State-Owned Enterprises, the amount of honorarium received by the Secretary of the BNI Board of Commissioners is a maximum of 15% (fifteen percent) of the President Director's salary and is entitled to a transportation allowance of 20% (twenty percent) of the honorarium per month and a religious holiday allowance, which is paid once a year in the amount of 1 (one) time honorarium.

Committees under the Board of Directors

In carrying out its duties, the Board of Directors has established ten (10) supporting committees in accordance with BNI's business needs, with the aim of enhancing the Bank's operational effectiveness and efficiency. These committees include, among others, the following:

1. Credit Committee
2. Integrated Risk Management Committee
3. Asset & Liability Committee (ALCO)
4. Risk Management & Anti-Fraud Committee
5. Business Committee
6. Performance Management Committee
7. Technology Management Committee
8. Credit Policy Committee
9. Human Capital (HR) Committee
10. Subsidiary Committee

Detailed information on the committees under the Board of Directors will be outlined in the following subsection.

Credit Committee

The Credit Committee is responsible for assisting Management in the decision-making process related to credit granting, including establishing credit policies and evaluating credit applications submitted by debtors. The Credit Committee carries out its duties based on the four-eyes principle, whereby credit decisions involve officials from both the business and risk functions to ensure objectivity and prevent conflicts of interest. BNI's Credit Committee is structured into three levels: the Head Office Credit Committee, the Division-Level Credit Committee, and the Regional Credit Committee.

In making credit decisions, the Credit Committee considers BNI's credit policies and procedures, assesses the debtor's financial condition, ensures credit security, and upholds the principles of Good Corporate Governance (GCG). In addition to approving or rejecting credit applications, the Credit Committee is also responsible for evaluating credit risk, determining credit exposure limits, and regularly monitoring the quality of the debtors' credit portfolio. Through these roles, BNI ensures asset quality and minimizes potential credit risks that could impact the Bank's financial stability.

Credit Committee Charter

BNI has established Corporate Credit Guidelines on Credit Decision-Making Authority, serving as a written reference for the Credit Committee to effectively and prudently carry out its duties and responsibilities. These guidelines regulate various aspects, including the committee's responsibilities, committee meetings, and the execution of its functions.

Duties and Responsibilities of the Credit Committee

The Credit Committee has the following duties and responsibilities:

1. Approving or rejecting credit proposals according to the authority limits and the type of credit established by the Board of Directors.
2. Responsible for credit decisions based on matters including the feasibility of the financed business, credit security considerations, compliance with credit policies and procedures and credit limit provisions;
3. Coordinating with related divisions in the aspect of credit funding;
4. Rejecting requests and/or influences from interested parties with credit applicants who provide credit only as a formality;
5. Carrying out his duties, especially in relation to granting credit approval according to his authority based on his professional skills honestly, objectively, carefully and thoroughly.

Credit Committee Structure and Membership

The Credit Committee is responsible for making credit decisions and comprises officials from both the business and risk functions, adhering to the four-eyes principle to ensure proper authority and prevent conflicts of interest. The Credit Committee (KK) is structured into three levels: the Head Office Credit Committee, the Division-Level Credit Committee, and the Regional Credit Committee. In making credit decisions, the committee considers the debtor's financial condition, credit security, credit policies and procedures, and the implementation of Good Corporate Governance (GCG).

Term and Membership Duration
The membership term of the Credit Committee is aligned with the tenure of the respective structural positions in BNI.

Credit Committee Members Profile
Detailed information on the profile of each committee member is comprehensively outlined in Chapter: Company Profile, under the subsections Profile of the Board of Directors, Profile of the Senior Executive Vice President (SEVP), and Profile of Executive Officers.

Credit Committee Member Certification
BNI ensures that all Credit Committee personnel have met the qualification standards and competency certification in accordance with applicable provisions. In 2024, the Credit Committee has participated in the certification program.

Credit Committee Independence Statement
All members of the Credit Committee affirm their ability and commitment to carrying out their duties and responsibilities objectively and independently, in compliance with applicable regulations and Good Corporate Governance (GCG) principles. The Credit Committee's Independence Statement is disclosed in the Integrity Pact, which is periodically updated and signed by all committee members.

Credit Committee Meetings

Meeting Policy
The meeting policy for the Credit Committee is governed by the Credit Decision Authority Guidelines.

Frequency and Attendance
As of December 31, 2024, a total of 800 Credit Committee meetings attended by the Board of Directors. These meetings comprised 327 Credit Committees for the Corporate Segment (including International and Institutional Banking), 142 Credit Committees for the Enterprise Segment, 315 Credit Committees for the Commercial Segment, and 16 Credit Committees for the Retail Segment (Consumer, Retail Productive, and Program Credit).

Credit Committee Training and/or Competency Improvement in 2024
In 2024, the Chair and members of the Credit Committee participated in various training programs, seminars, and workshops to maintain their expertise and competence in supporting the execution of their duties. Detailed information on this matter is provided in the Company Profile Chapter, under the subsection Competency Development Policy, within the discussion titled Competency Development Based on Job Level and Gender Equality in 2024. Additionally, further details can be found in the Corporate Governance Chapter, under the subsection Board of Directors, within the discussion titled Training and/or Competency Enhancement.

Implementation of Credit Committee Duties in 2024
Throughout 2024, the credit committee has carried out its duties and responsibilities in accordance with its authority.

Integrated Risk Management Committee

As the Main Entity of the BNI Financial Conglomerate, BNI has established the Integrated Risk Management Committee (KMRT) based on Decree No. KP/193/DIR/R dated May 26, 2015. The composition of the KMRT has since been reorganized through Decree No. KP/215/DIR/R dated May 31, 2024. The committee's membership structure has been adjusted in accordance with the prevailing Board of Directors' Functional Nomenclature.

The KMRT plays a crucial role in assisting the Board of Directors in ensuring that BNI's risk management policies and strategies, as the Main Entity of the BNI Financial Conglomerate, are implemented in compliance with applicable regulations and aligned with the organization's objectives. The committee's primary responsibilities include reviewing the effectiveness of the internal control system, evaluating risk policies, and providing recommendations to the Board of Directors to enhance risk management. Through the KMRT, BNI can minimize potential risks and strengthen the implementation of Integrated Governance.

Integrated Risk Management Committee Charter
All members of BNI's KMRT are required to carry out their duties and responsibilities with integrity and in good faith, while adhering to all provisions outlined in the Integrated Risk Management Committee Charter. This charter is periodically refined and updated in accordance with regulatory developments and legal changes. The most recent amendment to the Integrated Risk Management Committee Charter was enacted by the Board of Directors through Decree No. KP/215/DIR/R dated May 31, 2024.

Duties and Responsibilities of Integrated Risk Management Committee
BNI's KMRT is responsible for providing recommendations to the Board of Directors of the Main Entity in order to:

1. Preparation, improvement or refinement of Integrated Risk Management and Capital policies based on the results of job evaluation;
2. Establish methodologies and procedures used to identify, measure, monitor and control risks arising from all BNI Financial Conglomerate activities;
3. Provide recommendations on the establishment of methodology and integrated risk profile assessment for BNI Financial Conglomeration.

Structure and Membership of Integrated Risk Management Committee

BNI's KMRT consists of members of the Board of Directors, along with Executive Officers at one level below the Board who have been appointed. The structure of KMRT's membership is determined by a Board of Directors Decree, which also serves as the official assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The membership composition of KMRT as of December 31, 2024, based on Decree No. KP/215/DIR/R dated May 31, 2024 regarding the Arrangement of Integrated Risk Management Committee, is as follows.

Position on the Committee	Filled In by	Voting Rights Status
Chairman	Deputy President Director - BNI	Holds voting rights
Vice Chairman	Risk Management Director - BNI	Holds voting rights
Secretary	Enterprise Risk Management Division Head (concurrently as a permanent non-voting member)	Holds no voting rights
Permanent Members at Director & SEVP Level (Voting Members)	1. BNI Director who supervises the Subsidiaries Management Division. 2. BNI Director who supervises Subsidiaries Company*)	Holds voting rights
Permanent Members at Director Level (Non-Voting Members)	1. Human Capital & Compliance Director - BNI 2. Director who supervises the Risk Management function - Subsidiaries	Holds no voting rights
Permanent Members at Division/Unit/Functional Level) – Non-Voting Members	1. Subsidiaries Management Division Head – BNI 2. Compliance Division Head – BNI 3. Legal Division Head – BNI 4. Operational Risk Management Division Head – BNI 5. Head of Internal Audit Unit – BNI 6. Head of Anti-Fraud Unit – BNI 7. Corporate Planning & Performance Management Division Head – BNI 8. Treasury Division Head – BNI 9. CISO Division Head – BNI 10. IT Strategy & Architecture Division Head – BNI 11. Corporate Secretary Division Head – BNI 12. Division Head or equivalent overseeing Risk Management – Subsidiaries	Holds no voting rights
Non-Permanent Members	Directors of relevant sectors, SEVPs, Division Head, Departments, or Functional Units related to the meeting agenda, from both BNI and its Subsidiaries.	Holds no voting rights

Period and Tenure of Integrated Risk Management Committee

The term of office of KMRT membership is determined following each structural term of office at BNI.

Profile of Chairman and Members of Integrated Risk Management Committee

More detailed information on the profiles of BNI KMRT committees and members has been fully described in the Company Profile Chapter, Board of Directors Profile Sub-chapter, Senior Executive Vice President (SEVP) Profile Sub-chapter and Executive Officers Sub-chapter.

Certification of Integrated Risk Management Committee

BNI ensures that all members of the Integrated Risk Management Committee have met the required qualification standards and competency certifications in accordance with applicable regulations. In 2024, the Integrated Risk Management Committee successfully participated in a certification program.

Statement of Independence of Integrated Risk Management Committee

All members of the Integrated Risk Management Committee have carried out their duties and responsibilities independently. Statement of Independence of the Integrated Risk Management Committee has been disclosed in the Integrity Pact which is regularly updated and signed by all committee personnel.

Integrated Risk Management Committee Meeting

Meeting Implementation Policy

In accordance with the provisions stipulated in the Integrated Risk Management Committee Charter, the policies and procedures for the implementation of BNI KMRT meetings are as follows:

1. The Committee shall hold a meeting at least once in 6 months (semester) and/or as required at a certain place, time and date that has been determined so that all members can arrange their attendance.
2. If the Chairman and Vice Chairman are unable to attend, a substitute Chairman may be appointed through the mechanism of a substitute director or assignment letter.
3. The Committee may schedule sudden meetings considering the importance of issues that must be decided immediately, and hold limited meetings among related Divisions/Units/Functional Units/ Subsidiaries and formulate operational policies that are in line with established Committee policies.
4. If deemed necessary, the Committee has the right to invite other Divisions/Functional Units/ Subsidiary Companies outside the Committee members to attend the Committee meetings as resource persons in discussing certain issues according to the competence of the Division/ Functional Unit/Subsidiary Company.
5. The quorum of the Committee meeting is achieved if attended by at least more than 1/2 (half) of the voting members at the level of the Board of Directors, which includes the presence of the Chairman and/or Vice Chairman. In the case of the Director who supervises Risk Management in a Subsidiary Company, he/she is a permanent member but not a voting member.

Frequency and Attendance Rate

In 2024, BNI held 2 (two) KMRT meetings attended by the Board of Directors and committee members. More detailed information on the implementation of KMRT meetings and the attendance rate of committee members in these meetings is described in the following table:

No.	Date of Meeting	Meeting Agenda	Attendance Quorum (%)
1	January 31, 2024	1. Approval of the Integrated Risk Profile Self-Assessment as of December 31, 2023 2. Approval of the Calculation of the Integrated Minimum Capital Requirement as of December 31, 2023 [ACGS B.3.1]	83%
2	July 31, 2024	1. Approval of the Integrated Risk Profile Self-Assessment as of June 30, 2024 2. Approval of the Calculation of the Integrated Minimum Capital Requirement as of June 30, 2024 [ACGS B.3.1]	75%

Training and/or Competency Improvement of Integrated Risk Management Committee in 2024

In 2024, the Chairman and members of the Integrated Risk Management Committee (KMRT) participated in various training programs, seminars, and workshops to maintain their expertise and competence in supporting the execution of their daily duties. Information related to this has been described in the Company Profile Chapter, Competency Development Policy Subchapter in the discussion titled Competency Development Based on Position Level and Gender Equality in 2024, as well as in the Corporate Governance Chapter, Board of Directors Subchapter, in the discussion titled Training and/or Competency Improvement.

Implementation of Integrated Risk Management Committee Duties in 2024

Throughout 2024, the Integrated Risk Management Committee (KMRT) has carried out all its duties in accordance with its designated responsibilities.

Integrated Risk Management Committee Work Plan for 2025

The Integrated Risk Management Committee (KMRT) has established its work plan for 2025 with the following strategic priorities:

1. Integrated Risk Management Committee 01-2025 (Q1 2025)
   a. Approval of Integrated Risk Profile Self-Assessment Results as of December 31, 2024
   b. Approval of the calculation result of the Integrated Capital Adequacy Ratio (CAR) as of December 31, 2024

2. Integrated Risk Management Committee 02-2025 (Q3 2025)
   a. Approval of Integrated Risk Profile Self-Assessment Result as of June 30, 2025
   b. Approval of the Calculation Result of the Integrated Capital Adequacy Requirement (CAR) as of June 30, 2025
   c. Approval of the Integrated Risk Appetite Review Year 2025

Asset & Liability Committee (ALCO)

The Asset & Liability Committee (ALCO) is a permanent committee within BNI, established by and directly accountable to the Board of Directors. Within the Bank's governance structure, ALCO plays a crucial role in helping BNI maintain an optimal level of profitability by ensuring that liquidity risk, interest rate risk, and foreign exchange risk are effectively managed. This is achieved through the formulation of policies and strategies for BNI's assets and liabilities management.

ALCO Charter

The ALCO Committee operates under a work guideline outlined in the Asset & Liability Management Committee (ALCO) Charter, which was ratified by the Board of Directors through Decree No. KP/437/DIR/R dated September 22, 2021. This charter is periodically reviewed and updated to align with evolving regulatory requirements and legal changes.

Duties and Responsibilities of the ALCO

The ALCO has full authority and responsibility to:

1) Establish policies and manage the assets and liabilities of PT Bank Negara Indonesia (Persero) Tbk to cover risks and support the bank's business strategies.
2) Establish policies and manage assets and liabilities, including:
   a. Liquidity Management;
   b. Interest Rate Management;
   c. Foreign Exchange Management;
   d. Earnings & Investment Management.

Asset & Liability Committee Structure and Membership

BNI's ALCO consists of members of the Board of Directors, along with appointed Executive Officers at one level below the Board. The structure of ALCO's membership is determined by a Board of Directors Decree, which also serves as the official assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The composition of BNI ALCO Committee as of December 31, 2024, based on Decree No. KP/437/DIR/R dated September 22, 2021 regarding Asset & Liability Committee Arrangement (ALCO), which was later updated through CDV memo No. CDV/2/783/R dated August 15, 2024 regarding Submission of Asset & Liability Committee Membership Updating (ALCO), is as follows:

Position on the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Treasury Division Head (concurrently a permanent member)	Holds no voting rights
Permanent Member at Board of Directors & SEVP Level (Voting member)	1. Wholesale & International Banking Director 2. Enterprise & Commercial Banking Director 3. Retail Banking Director 4. Digital & Integrated Transaction Banking Director 5. Network & Services Director 6. Risk Management Director 7. Finance Director 9. SEVP Treasury	Holds voting rights
Permanent Member at Board of Directors Level Permanent (Non-voting Member)	Human Capital & Compliance Director*	Holds no voting rights
Non-permanent member at the Board of Directors & SEVP level (Voting member)	1. Technology & Operations Director 2. SEVP Corporate Banking 3. SEVP Wealth Management 4. SEVP Credit Risk 5. SEVP Remedial & Recovery 6. SEVP Information Technology 7. SEVP Operations 8. SEVP Retail Digital Solutions	Holds voting rights

Position on the Committee	Filled In by	Voting Rights Status
Permanent Member at Division/Unit level (Non-voting member)	1. International & Financial Institutions Division Head 2. Corporate Banking 1 Division Head 3. Corporate Banking 2 Division Head 4. Corporate Banking 3 Division Head 5. Corporate Banking 4 Division Head 6. Syndication & Structured Finance Division Head 7. Institutional Banking 1 Division Head 8. Institutional Banking 2 Division Head 9. Enterprise Banking Division Head 10. Commercial Banking 1 Division Head 11. Commercial Banking 2 Division Head 12. Retail Productive Banking Division Head 13. Business Program Division Head 14. Wholesale Transaction Product & Partnership Division Head 15. Wholesale Digital Channel Division Head 16. Retail Digital Product & Partnership Division Head 17. Retail Digital Channel Division Head 18. Consumer Product Division Head 19. Consumer Segment Division Head 20. Wealth Management Division Head 21. Corporate & Enterprise Credit Risk Division Head 22. Commercial Credit Risk Division Head 23. Retail Credit Risk Division Head 24. Retail Collection & Recovery Division Head 25. Corporate Remedial & Recovery Division Head 26. Enterprise & Commercial Remedial & Recovery Division Head 27. Distribution Network & Sales Division Head 28. Subsidiaries Management Division Head 29. Office of Chief Economist Division Head 30. Corporate Planning & Performance Management Division Head 31. Accounting Division Head 32. Policy Governance Division 33. Enterprise Risk Management Division Head 34. Compliance Division Head 35. Internal Audit Unit 36. Card Business Division Head 37. Agen46 Division Head	Holds no voting rights
Non-permanent member (Non-voting member)	Division Head/Units and Directors of Subsidiary Companies related to the topic of discussion	Holds no voting rights

*) Human Capital & Compliance Director has specific duties and responsibilities as stipulated in the committee guidelines.

Term and Tenure of ALCO Committee

The tenure of ALCO Committee membership is determined in accordance with the respective structural terms of office at BNI.

Profile of the Chair and Members of the ALCO

Detailed information regarding the profile of the ALCO Committee and its members is comprehensively outlined in the Company Profile chapter, specifically in the sub-chapters on the Profile of the Board of Directors, the Profile of Senior Executive Vice Presidents (SEVP), and the Profile of Executive Officers.

Asset & Liability Committee Certification

BNI ensures that all members of the ALCO Committee meet the required qualification standards and competency certifications in accordance with applicable regulations. In 2024, the ALCO Committee successfully completed the designated certification program.

ALCO Independence Statement

All members of BNI's ALCO are assured to meet the independence criteria and individual requirements as professionals in carrying out their duties and responsibilities objectively and independently, free from any conflicts of interest with the Bank. The ALCO Independence Statement is disclosed in the Integrity Pact, which is periodically updated and signed by all ALCO personnel.

Asset & Liability Committee Meeting

Meeting Implementation Policy

As stipulated in the Asset & Liability Management Committee (ALCO) Charter, the policies and procedures for conducting BNI ALCO Committee meetings are as follows:

1. The Committee meets at least once every 3 months (quarterly) or as required at a certain place, time and date that has been determined so that all members can arrange time for attendance.
2. If the Chairman and Vice Chairman are unable to attend, a substitute Chairman may be appointed through a substitute director mechanism or assignment letter.
3. The Committee may schedule unannounced meetings considering the importance of issues that must be decided immediately, and hold limited meetings with relevant Divisions/Units and formulate operational policies that are in line with the established Committee policies, and hold Mini ALCO, which is attended by at least 3 (three) Directors as follows: Wholesale & International Banking Director, Risk Management Director and Finance Director.
4. The quorum of the meeting is achieved if attended by at least ½ (half) of the permanent members at the level of Directors & SEVPs including the presence of the Chairman and/or Vice Chairman of the Committee.

Frequency and Attendance

In 2024, BNI held 7 ALCO Committee meetings which were attended by the Board of Directors and committee members. More detailed information on the implementation of ALCO Committee Meetings and the attendance rate of committee members in the meetings is described in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 16, 2024	Credit and DPK growth strategy up to the first semester of 2024	100%
2	March 5, 2024	Review of the credit and DPK growth strategy up to the first semester of 2024	100%
3	May 28, 2024	Review of the credit and DPK growth strategy up to the first semester of 2024, along with a review of the foreign currency loan counter rate	94,7%
4	July 1, 2024	DPK growth strategy, including through the Wondr channel, and credit expansion strategy until December 2024	89,4%
5	July 29, 2024	Determination of changes in loan pricing and amendments to the authority for approving the publication of the Prime Lending Rate (SBDK) report	100%
6	October 7, 2024	Review of the credit and DPK growth strategy until December 2024, issuance of securities to support the government's housing loan program, and discussion of the Prime Lending Rate (SBDK)	90%
7	November 11, 2024	Review of the DPK growth strategy and approval of the principal permit for non-conventional funding in 2025	95%

Implementation of Asset & Liability Committee Duties in 2024

Throughout 2024, the ALCO Committee has effectively carried out its management duties and work programs in accordance with its assigned responsibilities.

Training and/or Competency Improvement of Asset & Liability Committee in 2024

In 2024, the Chairperson and members of the ALCO Committee participated in various training programs, seminars, and workshops to maintain their expertise and competencies in support of their duties. Information related to this matter has been described in the Company Profile Chapter, Competency Development Policy Subchapter in the discussion entitled Competency Development Based on Position Level and Gender Equality in 2024, as well as in the Corporate Governance Chapter, Board of Directors Subchapter, in the discussion entitled Training and/or Competency Improvement.

Work Plan of the ALCO Committee for 2025

The ALCO has established its work plan for 2025 with the following strategic priorities:

1. Growth strategies for Third-Party Funds (DPK) and Credit, in line with the Bank's Business Plan for 2025.;
2. Pricing strategies for DPK and Credit;
3. Liquidity and funding management strategies.

Risk Management & Anti-Fraud Committee (KRA)

The Risk Management & Anti-Fraud Committee (KRA) is a permanent committee under the Board of Directors, authorized to provide recommendations regarding the formulation, establishment, and management of risk policies. These encompass Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputational Risk, Strategic Risk, and Compliance Risk. Additionally, this committee is responsible for establishing policies and managing anti-fraud strategies across all organizational units and assists the Board in setting policies and managing Environmental, Social & Governance (ESG) matters, as well as conducting credit risk portfolio assessments for the Bank.

As part of its continuous improvement efforts, BNI has undertaken several restructurings of the Risk Management & Anti-Fraud Committee (KRA) and updated its working procedures. These refinements have been formalized through the Board of Directors' Decree No. KP/745/DIR/R dated October 26, 2023, regarding the restructuring of the Risk Management & Anti-Fraud Committee (KRA). In connection with the update, BNI Risk Management & Anti-Fraud Committee has 4 (four) sub-committees, namely:

A. Risk Management Sub-Committee (RMC);
B. Anti-Fraud Sub-Committee (KAF);
C. Environmental, Social & Governance Sub-Committee (ESG); and
D. Credit Risk Portfolio Sub-Committee (CRO).

Charter of the Risk Management & Anti-Fraud Committee (KRA)

The Risk Management & Anti-Fraud Committee is required to perform its duties and responsibilities professionally and in good faith to achieve the Bank's interests, based on the Charter of the Risk Management & Anti-Fraud Committee (KRA). This Charter is reviewed and updated periodically in line with changes in applicable legal regulations. The most recent update was made by the Board of Directors through Decree No. KP/745/DIR/R dated October 26, 2023.

Duties and Responsibilities of the Risk Management Sub-Committee (RMC)

A. Risk Management Sub-Committee (RMC)

In executing its functions, the members of the RMC Sub-Committee are tasked with evaluating and providing recommendations to the Board regarding risk management, which at a minimum includes:

1. Formulating Risk Management Policies and Strategies and any changes thereto;
2. Developing a Risk Management framework and contingency plans to anticipate abnormal conditions;
3. Periodically or incidentally improving the Risk Management process due to changes in the Bank's external and internal conditions that affect Capital Adequacy, Risk Profile, and ineffective Risk Management implementation based on evaluation results;
4. Establishing policies and/or business decisions that deviate from normal procedures, such as exceeding significant business expansion compared to the previously set Business Plan or taking positions/exposures that exceed established limits; and
5. Establishing policies for managing capital adequacy to mitigate risks and support the Bank's business strategy, including measurement, structure (tier 1/tier 2), allocation, and capital contingency plans.

B. Duties and Responsibilities of the Anti-Fraud Sub-Committee

The primary duties of the Anti-Fraud Sub-Committee are as follows:

1. Identify, evaluate, and determine follow-up actions for fraud incidents originating from activities in all BNI work units;
2. Develop an anti-fraud culture and awareness throughout the organization;
3. Establish Anti-Fraud policies and strategies at BNI;
4. Monitor the implementation of Anti-Fraud policies and strategies at BNI and periodically review the impact of the policies and strategies implemented.

C. Environmental, Social, & Governance (ESG) Sub-Committee

The ESG Sub-Committee is tasked with the following responsibilities:

1. Formulating policies and strategies for managing Environmental, Social, & Governance (ESG) aspects, including any revisions.
2. Identifying potential ESG risks that could impact both BNI and its stakeholders.
3. Monitoring the implementation of the Sustainability Finance strategy.
4. Overseeing, evaluating, and providing recommendations on the results of BNI's ESG Assessment.
5. Assessing the implementation of ESG strategies across all of BNI's business lines.

D. Credit Risk Portfolio (CRO) Sub-Committee

The CRO Sub-Committee has a number of duties and responsibilities, including the following:

1. Discussing the credit risk assessment as the basis for determining the adequacy of provisioning.
2. Discussing the development of the condition and quality of the credit portfolio.
3. Determine strategies, mitigation and follow-up on credit risk management that may affect the Bank's soundness.

Structure and Membership of Risk Management & Anti-Fraud Committee

The KRA BNI consists of members of the Board of Directors, along with Executive Officers one level below the Board who have been appointed. The committee's membership structure is established through a Board of Directors' Decree, which also serves as the official designation of the Chairman, Vice Chairman, and Committee Members.

The sub-committee membership system within the Risk Management & Anti Fraud Committee is divided into:

1. 1. Permanent members, are members who are present at each Sub-Committee meeting agenda to provide insight and input on the subject matter determined by the Sub-Committee. Permanent members consist of permanent voting members and/or permanent non-voting members.
2. Non-permanent members are members who are present when needed in the Sub-Committee meeting to be a resource person on the subject of discussion/problems in accordance with their competence, which has been determined by the Secretary of the Sub-Committee.

The structure, membership, and voting status of KRA as of December 31, 2024, based on the Decree of the Board of Directors No. KP/745/DIR/R dated October 26, 2023 regarding the Arrangement of the Risk Management and Anti Fraud Committee (KRA), are as follows:

A. Risk Management Sub-Committee (RMC)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Deputy President Director	Holds voting rights
Vice Chairman	Risk Management Director	Holds voting rights
Secretary	Enterprise Risk Management Division Head (concurrently as a permanent non-voting member)	Holds no voting rights
Permanent Members at Directors & SEVP Level (Voting Member)	1. Finance Director 2. Wholesale & International Banking Director 3. Enterprise & Commercial Banking Director 4. Network & Services Director 5. Retail Banking Director 6. Technology & Operations Director 7. Digital & Integrated Transaction Banking Director 8. SEVP Treasury 9. SEVP Operations	Holds voting rights
Permanent Member at Board of Directors Level (Non-voting Member)	Human Capital & Compliance Director *	Holds no voting rights
Permanent member at Division/Unit level (Non-voting Member)	1. Operational Risk Management Division Head 2. Treasury Division Head 3. Corporate & Enterprise Credit Risk Division Head 4. Commercial Credit Risk Division Head 5. Retail Credit Risk Division Head 6. Corporate Development & Transformation Division Head 7. Compliance Division Head 8. Corporate Planning & Performance Management Division Head	Holds no voting rights

Position in the Committee	Filled In by	Voting Rights Status
	9. Accounting Division Head 10. Office of Chief Economist Division Head 11. Subsidiary Management Division Head 12. Internal Audit Unit Head 13. Legal Division Head 14. Corporate Secretary Division Head 15. Policy Governance Division Head 16. Credit Operations Division Head 17. Distribution Network & Sales Division Head 18. Wholesale Transaction Product & Partnership Division Head 19. Head of Anti Fraud Unit 20. SORX Wholesale Banking 21. SORX Network & Services 22. SORX Consumer Banking & Corporate Function 23. SORX Technology, Digital & Operations	
Non-permanent member (Non-voting Member)	Sector Director/SEVP/Division Head related to the topic of discussion.	Holds novoting rights

*) Human Capital & Compliance Director has specific duties and responsibilities as stipulated in the committee guidelines.

B. Anti-Fraud Sub-Committee (AAF)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Deputy President Director	Holds voting rights
Vice Chairman	Risk Management Director	Holds voting rights
Secretary	Head of Anti Fraud Unit (concurrently non-voting member)	Holds no voting rights
Permanent Members at Directors & SEVP level (Voting member)	1. Network & Services Director 2. Retail Banking Director 3. Technology & Operations Director 4. SEVP Retail Digital Solutions 5. SEVP Operations	Holds voting rights
Permanent Member at the level of the Board of Directors (Non-voting Members)	Human Capital & Compliance Director*	Holds no voting rights
Permanent Member at the level of Division/Unit/ Functional Unit (Non-voting Members)	1. Enterprise Risk Management Division Head 2. Operational Risk Management Division Head 3. Compliance Division Head 4. Policy Governance Division Head 5. Internal Audit Unit 6. Human Capital Strategy Division Head 7. Human Capital Services Division Head 8. Legal Division Head 9. Distribution Network & Sales Division Head 10. CISO Division Head	Holds no voting rights
Non-permanent Member (Non-voting Members)	Director/SEVP/Division Head/Unit/Functional Unit related to the topic of discussion	Holds no voting rights

*) Human Capital & Compliance Director has specific duties and responsibilities as stipulated in the committee guidelines.

C. Environment, Social and Governance (ESG) Sub-Committee

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Deputy President Director	Holds voting rights
Vice Chairman	Risk Management Director	Holds voting rights
Secretary	Enterprise Risk Management Division Head (also serves as permanent non-voting member)	Holds no voting rights
Permanent Members at the Board of Directors & SEVP level (Voting Members)	1. Finance Director 2. Wholesale & International Banking Director 3. Enterprise & Commercial Banking Director 4. SEVP Treasury 5. Retail Banking Director 6. Network & Services Director 7. Technology & Operations Director	Holds voting rights

Position in the Committee	Filled In by	Voting Rights Status
Permanent Members at the Board of Directors level (Non-voting Members)	Human Capital & Compliance Director*	Holds no voting rights
Permanent Members at the Division/Unit level (Non-voting Members)	1. Corporate Secretary Division Head 2. Policy Governance Division Head 3. Investor Relations Division Head 4. Corporate Planning & Performance Management Division Head 5. International Banking & Financial Institutions Division Head 6. Subsidiaries Management Division Head 7. Procurement & Fixed Assets Division Head 8. Treasury Division Head 9. Compliance Division Head 10. BNI University Division Head 11. Human Capital Strategy Division Head 12. Human Capital Services Division Head 13. Corporate Banking 1 Division Head 14. Corporate Banking 2 Division Head 15. Corporate Banking 3 Division Head 16. Corporate Banking 4 Division Head 17. Syndication & Structured Finance Division Head 18. Enterprise Banking Division Head 19. Commercial Banking 1 Division Head 20. Commercial Banking 2 Division Head 21. Operational Risk Management Division Head 22. Corporate & Enterprise Credit Risk Division Head 23. Commercial Credit Risk Division Head 24. Consumer Product Division Head 25. Retail Productive Banking Division Head 26. Business Program Division Head 27. Card Business Division Head 28. Agen46 Division Head	Holds no voting rights
Non-permanent members (Non-voting Members)	Director/SEVP/Division Head/Unit/Functional Unit related to the topic of discussion.	Holds no voting rights

*) Specifically, Human Capital & Compliance Director has special duties and responsibilities as regulated in the committee's work guidelines.

D. Credit Risk Portfolio (CRO) Sub-Committee

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Risk Management Director	Holds voting rights
Vice Chairman	Finance Director	Holds voting rights
Secretary	Corporate & Enterprise Credit Risk Division Head (concurrently a permanent non-voting member)	Holds no voting rights
Permanent Members at the Director & SEVP level (Non-voting members)	1. SEVP Credit Risk 2. SEVP Remedial & Recovery	Holds no voting rights
Permanent Members at the Division/Unit/ Functional Unit level (Non-voting Members)	1. Corporate Planning & Performance Management Division Head 2. Accounting Division Head 3. Enterprise Risk Management Division Head 4. Commercial Credit Risk Division Head 5. Retail Credit Risk Division Head 6. Corporate Remedial & Recovery Division Head 7. Enterprise & Commercial Remedial & Recovery Division Head 8. Retail Collection & Recovery Division Head 9. Treasury Division Head 10. Division Head according to the meeting material	Holds no voting rights
Permanent member (Non-voting member)	Director/SEVP/Division Head/Unit/Functional Unit related to the topic of discussion.	Holds no voting rights

Risk Management & Anti Fraud Committee Term and Office

The term of office of the Risk Management & Anti Fraud Committee membership is determined following each structural term of office at BNI.

Profile of the Chairman and Members of the Risk Management & Anti Fraud Committee

Detailed information on the profile of the committee and members of the BNI Risk Management & Anti Fraud Committee has been fully described in the Company Profile Chapter, Directors Profile Sub-chapter, Senior Executive Vice President (SEVP) Profile Sub-chapter and Executive Officers Sub-chapter.

Risk Management & Anti-Fraud Committee Certification

BNI ensures that all Risk Management & Anti Fraud personnel have met the qualification standards and competency certification in accordance with applicable regulations. In 2024, Risk & Anti-Fraud Management has met the established certification program.

Independence Statement of Risk Management & Anti-Fraud Committee

BNI ensures that all KRA members have met the independence criteria and individual requirements as objective and independent parties in carrying out their duties and responsibilities objectively and free from any conflict of interest with the Bank. The Independence Statement of the chairman and members of KRA has been disclosed in the Integrity Pact which is regularly updated and signed by all committee personnel.

Risk Management & Anti-Fraud Committee Meeting

Meeting Implementation Policy

1. Each Sub-Committee shall hold meetings at least 4 (four) times in 1 (one) year or as needed at a certain place, time and date that has been determined so that all members can arrange time for attendance.
2. If the Chairperson and Vice Chairperson are unable to attend, a Substitute Chairperson & Substitute Vice Chairperson may be appointed through the mechanism of Substitute Director or assignment letter.
3. The Sub-Committee may schedule sudden meetings considering the importance of the issues that must be decided immediately. Decisions of the Sub-Committee are then executed through the Secretary of the Sub-Committee. In addition, the Sub-Committee may hold limited meetings with relevant Divisions/Units and formulate operational policies that are in line with the established Sub-Committee policies.
4. If deemed necessary, the Sub-Committee has the right to invite other Divisions/Units outside the Sub-Committee members to attend Sub-Committee meetings as resource persons in discussing certain issues according to the competence of the Division/Unit.
5. The quorum of the meeting is achieved if attended by at least ½ (half) of the permanent members at the level of the Board of Directors & SEVP, which includes the presence of the Chairman and/or Vice Chairman. Specifically for the Credit Risk Portfolio (CRO) Sub-Committee, the meeting quorum is achieved if at least ½ (half) of the permanent members at the Board of Directors & SEVP level are present, in which the Chairman and Vice Chairman are present.

Frequency and Attendance Rate

A. Risk Management Sub-Committee (RMC)

In 2024, BNI held 5 (five) RMC Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of RMC Sub-Committee meetings and the attendance rate of committee members in these meetings is described in the following table:

No.	Date	Meeting Agenda	Kuorum Kehadiran (%)
1	January 12, 2024	BNI's Soundness Level and Risk Profile as of December 31, 2023	55%
2	April 19, 2024	BNI Risk Profile as of March 31, 2024	100%
3	July 3, 2024	Progress of Implementation of New Framework Operational Risk – SORX Control Testing Results as of May 2024	100%
4	July 12, 2024	BNI's Soundness Level and Risk Profile as of June 30, 2024	91%
5	October 11, 2024	BNI's Risk Profile as of September 30, 2024	73%

B. Anti Fraud Sub-Committee (KAF)

In 2024, BNI held three Sub-Committee KAF meetings attended by the Board of Directors and committee members. More detailed information on the implementation of the Sub-Committee KAF meetings and the attendance rate of committee members is outlined in the following table:

No.	Date	Meeting Agenda	Quorum (%)
1	May 22, 2024	Follow-up on the directives from the previous Anti-Fraud Committee meeting. Profiling of internal and external fraud for Q1 2024. Evaluation and follow-up on fraud case remediation efforts, fraud reporting to law enforcement authorities, and implementation of KnowYour Employee.	100%
2	September 24, 2024	Profiling of internal fraud perpetrators for the first half of 2024. Enhancement of the KnowYour Employee program.	87,5%
3	Desember 11, 2024	Strengthening the implementation of the Anti-Fraud Strategy in alignment with OJK Regulation No. 12 of 2024 dated July 31, 2024, regarding the Implementation of the Anti-Fraud Strategy for Financial Service Institutions.	64,5%

C. Sub-Komite Environmental, Social & Governance (ESG)

In 2024, BNI has held 4 (four) ESG Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of the ESG Sub-Committee meetings and the attendance rate of committee members in the meetings is outlined in the following table:

No.	Date	Meeting Agenda	Quorum (%)
1	January 22, 2024	BNI ESG Initiative Update 2024	100%
2	March 13, 2024	BNI Sustainability Report 2023, Green Bond Distribution, BNI SDG's Focus, Carbon Project, Preparation of Climate Risk Stress Test Reporting	82%
3	August 19, 2024	BNI MSCI Rating Update, Waste Management, COP29 Baku Azerbaijan, BNI ESG Communication and Publication, Climate Risk StressTest (CRST) Update, ESG Management Organizational Structure	91%
4	December 9, 2024	COP29 Baku Azerbaijan, Material Sustainability Report 2024 Themes and Topics, BNI Waste Management Update, Use of Recycle Based Paper for BNI Business Cards	73%

D. Sub-Komite Credit Risk Portfolio (CRO)

In 2024, BNI held 11 CRO Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the timing of the CRO Sub-Committee meetings and the discussions in the meetings are described in the following table:

No.	Date	Meeting Agenda	Quorum (%)
1	February 28, 2024	Assessment Expected Credit Loss (ECL) of Debtors for February 2024.	100%
2	March 27, 2024	Assessment Expected Credit Loss (ECL) of Debtors for March 2024.	100%
3	May 2, 2024	Assessment Expected Credit Loss (ECL) of Debtors for April 2024.	100%
4	May 31, 2024	Assessment Expected Credit Loss (ECL) of Debtors for May 2024.	100%
5	June 25, 2024	Assessment Expected Credit Loss (ECL) of Debtors for June 2024.	100%
6	July 26, 2024	Assessment Expected Credit Loss (ECL) of Debtors for July 2024.	100%
7	August 29, 2024	Assessment Expected Credit Loss (ECL) of Debtors for August 2024.	100%
8	September 25, 2024	Assessment Expected Credit Loss (ECL) of Debtors for September 2024.	100%
9	October 23, 2024	Assessment Expected Credit Loss (ECL) of Debtors for October 2024.	100%
10	November 26, 2024	1. Assessment Expected Credit Loss (ECL) of Debtors for November 2024. 2. Re-modeling of IFRS-9 Expected Credit Loss (ECL) in 2024 for Corporate, Enterprise, Commercial, Small, and Consumer segments.	100%
11	December 27, 2024	Assessment Expected Credit Loss (ECL) of Debtors for December 2024.	100%

Training and Competency Development for the Risk Management & Anti-Fraud Committee (KRA) in 2024

In 2024, the chairman and members of KRA have participated in a number of training activities/ seminars/workshops in order to maintain their level of expertise and competence to support the implementation of their daily duties. Information related to this has been described in the Company Profile Chapter, Competency Development Policy Subchapter in the discussion entitled Competency Development Based on Position Level and Gender Equality in 2024, as well as in the Corporate Governance Chapter, Board of Directors Subchapter, in the discussion entitled Training and/ or Competency Improvement.

Implementation of the Risk Management & Anti-Fraud Sub-Committee's Tasks in 2024

A. Risk Management Sub-Committee (RMC)

Throughout 2024, the RMC Sub-Committee has carried out its duties in accordance with its assigned responsibilities.

B. Anti Fraud Sub-Committee (AAF)

In carrying out its management duties during 2024, the Anti Fraud Sub-Committee has realized the work program that was set at the beginning of the year, including the following:

1. Strengthening the Anti Fraud Strategy policy.
2. Strengthening the pillars of fraud prevention in the form of monitoring employee profiles as part of the implementation of Know Your Employee.
3. Implementation of the Anti Fraud Strategy pillar in the form of imposing sanctions and reporting fraud incidents to Law Enforcement Officials in order to provide a deterrent effect on fraud.
4. Evaluation and follow-up on efforts to improve fraud cases.

C. Environmental, Social, & Governance (ESG) Sub-Committee

Throughout 2024, the ESG Sub-Committee has realized work programs, among others:

1. Supervision function on the implementation of ESG at BNI, including the achievement and improvement of BNI's MSCI ESG rating.
2. Implementation of Climate Risk Stress Test (CRST) for 50% of BNI's credit portfolio in accordance with OJK direction, along with the development of CRST tools.
3. Development of BNI Waste Management with the concept of zero waste to landfill.
4. Distribution of BNI Green Bond in accordance with BNI Green Bond framework and POJK No. 60 of 2017.
5. Development of BNI's function as a debtor partner in the transition journey through the organization of BNI ESG Sustainability & Transition (BEST) Event and TKBI Technical Assistant Workshop for BNI debtors in the energy sector.
6. Implementation of the Indonesian Taxonomy of Sustainable Finance (TKBI) in the energy sector in accordance with OJK's directives

D. Credit Risk Portfolio (CRO) Sub-Committee

In carrying out its management duties during 2024, the realization of the CRO Sub-Committee work program is as follows:

1. 1.Follow-up on the development of debtor conditions that have an impact on the quality of the credit portfolio and the adequacy of reserves every month.
2. Re-modelling the calculation of provisioning adequacy, in accordance with IFRS 9 and the nature of business of each segment.

Risk Management & Anti-Fraud Sub-Committee Work Plan 2024

A. Risk Management Sub-Committee (RMC)

The RMC Sub-Committee has prepared a work plan for the coming year 2025 with a focus on evaluating and providing recommendations to the Board of Directors regarding risk management.

B. Anti Fraud Sub-Committee (AAF)

The Anti Fraud Sub-Committee has prepared a work plan and program for 2025 in order to implement the 4 Pillars of Anti Fraud Strategy as stipulated in POJK No. 12 of 2024, especially strengthening the Prevention Pillar. Evaluation of the implementation of the work program is reported in the Anti Fraud Sub-Committee forum.

C. Environmental, Social, & Governance (ESG) Sub-Committee

The ESG Sub-Committee has established a work plan for 2025, as follows:

Related to Sustainability Products and Services

1. Increased Green Loan portfolio with a target increase of 5% - 10% per year.
2. Development of Sustainability Finance Framework.
3. Partnership with institutions to develop ESG programs.

4. Development of MSME program:
   i. Eco-friendly MSMEs:
      - BUMI program with target market of MSME players who use materials and produce environmentally friendly products.
      - Jejak Kopi Khatulistiwa (JKK) program empowers coffee farmers through the use of Social Forest land.
   ii. MSMEs Go Global:
      - Encouraging BUMI and JKK programs to enter the export market.
      - Education and capability building program to support MSMEs to enter the export market with a target of 27,700 MSMEs.
5. Expansion of "Ayo Menabung dengan Sampah" Program to 640 schools.
6. Development of an Environmentally Friendly Credit Card program for the purchase of sustainable goods, in collaboration with WWF.
7. Gradual expansion of Agen46 in 3T areas, so that by 2028, 25,000 agents in 3T areas will be reached.
8. Digitalization of outlets for all BNI outlets.
9. Optimization of digital channels for SME transactions, Agen46, and Digital Banking customers.

Related to Sustainable Finance Management in Risk Management

1. Establish Debtor Transition Advisory framework and program for high emission sectors.
2. Alignment of portfolio management with transition plan in high emission sector.
3. Debtor Transition Program education for high emission sector.
4. Operational emissions platform to achieve Operational NZE.
5. Implementation of Climate Risk Stress Test for 100% of loan portfolio.
6. Implementation of Waste Management with the concept of Zero Waste to Land-fill (ZWTL) and circular economy in all BNI and Subsidiary Company offices.
7. Implementation of IFRS S1 & S2.
8. Adoption of PCAF methodology in the calculation of Financing Emissions.
9. Adoption of international best practice standards.
10. Development of Climate Risk Framework with TCFD principles.
11. Development of Decarbonization Roadmap and establishment of annual operational emission decarbonization targets with SBTi principles.
12. Planning and Implementation of Conservation Project (Carbon Project) for emission offset.
13. Determination of SDGs Focus and Refocusing CSR programs & targets according to SDGs Focus.

Related to Internal Capacity Development

1. ESG Refreshment program for employees.
2. ESG certification for ESG Management managers: ESG Investing, Climate Risk and GRI Standard.
3. Establishment of ESG Academy.
4. ESG Campaign through Green LifeStyle for employees and Establishment of ESG Ambassador.
5. ESG Campaign for Customers/Debtors through BNI ESG Sustainability & Transition (BEST) Event.
6. BNI participation in national and international ESG events.

D. Sub-Committee on Credit Risk Portfolio (CRO)

The Sub-Committee on CRO has established its work plan for 2025, focusing on enhancing the execution of the Credit Risk Portfolio Sub-Committee. This initiative aims to improve credit risk assessment as the basis for determining the adequacy of provisioning, evaluating the quality of the credit portfolio, and formulating credit risk management strategies that may impact the Bank's financial health.

Business Committee (KBI)

The Business Committee (KBI) is a standing committee at BNI, authorized to provide recommendations to the Board of Directors regarding the formulation of policies on product or activity management and the Bank's business strategy.

To enhance operational effectiveness and align with the Bank's business needs, in 2022, BNI restructured the Sub-Committee on Business (KBI). Previously under the oversight of the Credit & Business Policy Committee (KRB), it was transferred to the supervision of the Product Committee (PRC). Additionally, the Product Committee (PRC) was integrated into the Business Committee (KBI), a structure that remains in place. This restructuring, as outlined in the Board of Directors' Decree No. KP/025/DIR/R dated January 18, 2024, led to changes within the Business Committee (KBI). The number of sub-committees increased from two to three, and the previously named Business Value Chain Committee (BVC) retained its designation as the Business Value Chain Committee (BVC). As a result, the composition of the Business Committee (KBI) is as follows:

A. Product Sub-Committee (PRC),
B. Business Value Chain Sub-Committee (BVC), and
C. Marketing Strategy Sub-Committee (MKT).

Business Committee Charter

The Business Committee carries out its duties and responsibilities based on the Business Committee Charter, which was established by the Board of Directors through Decree No. KP/025/DIR/R dated January 18, 2024. This charter is periodically reviewed and updated to align with regulatory developments and changes in applicable laws.

Duties and Responsibilities of the Business Committee

A. Product Sub-Committee (PRC)

The Product Sub-Committee (PRC) is responsible for the following tasks:

1. Establishing business scale strategies and development plans through BNI's products and activities.
2. Conducting a comprehensive assessment and determining the "feasibility" of new products or activities, particularly those involving cross-sectoral/segment alliances and strategic partnerships with subsidiaries or external companies, by inviting the relevant Sector Director.
3. Monitoring the implementation of products and activities at BNI and making decisions regarding their continuity based on recommendations from the Supporting Staff Group or product owners.
4. Acting as an arbitration body for cross-sectoral issues related to the Performance Management System (PMS) in the implementation of new products or activities.

B. Business Value Chain Sub-Committee (BVC)

The Business Value Chain Sub-Committee (BVC) is responsible for the following key tasks:

1. Establishing execution strategies for the business ecosystem of selected customers/debtors/prospective customers/prospective debtors along with their value chains.
2. Defining and deciding on cross-selling strategies and programs, pricing optimization, and product package deals for the business ecosystem of selected customers/debtors/prospective customers/prospective debtors, in accordance with prevailing authorities.
3. Setting and monitoring strategic business collaboration strategies, including cooperation among Divisions/Units/Functional Units/Regional Offices/Sentra/Branches and Subsidiaries.
4. Overseeing and evaluating the execution strategies for the business ecosystem of selected customers/debtors/prospective customers/prospective debtors along with their value chains.

C. Marketing Strategy Sub-Committee (MKT)

The Marketing Strategy Sub-Committee (MKT) is responsible for the following key tasks:

1. Establishing BNI's marketing and corporate branding strategies aligned with BNI's strategic business plans (i.e., Corporate Plan & RBB).
2. Prioritizing marketing and corporate branding strategy initiatives that significantly impact BNI's business and operations, in line with BNI's planning and budgeting.
3. Reviewing plans and monitoring the realization of BNI's marketing and corporate branding strategies.

Structure and Membership of the Business Committee

The Business Committee consists of members of the Board of Directors, along with appointed Executive Officers at one level below the Board of Directors. The structure of the Business Committee's membership is determined based on a Board of Directors' Decree, which also serves as the formal assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The structure, membership, and voting rights status of the Business Committee as of December 31, 2024, are outlined in Board of Directors' Decree No. KP/025/DIR/R dated January 18, 2024, regarding the Issuance of the Board of Directors' Decree on the Structuring of the Business Committee (KBI), as follows:

A. Product Sub-Committee (PRC)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Finance Director	Holds voting rights
Secretary	Corporate Planning & Performance Management Division Head (also Permanent Member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member)	Deputy President Director Network & Services Director Risk Management Director Technology & Operations Director	Holds voting rights
Permanent Member at the Board of Directors level (Non-voting member)	Human Capital & Compliance Director*	Holds no voting rights

Position in the Committee	Filled In by	Voting Rights Status
Permanent Member at the Division/Unit/Functional Unit level (Non-voting member)	Policy Governance Division Head Distribution Network & Sales Division Head Enterprise Risk Management Division Head Operational Risk Management Division Head Anti Fraud Unit Head IT Strategy & Architecture Division Head Banking Operations Division Head Compliance Division Head Legal Division Head Customer Experience Center Division Head	Holds no voting rights
Permanent member** (Non-voting member)	Sector Director/SEVP/Division Head/Unit/Functional Unit related to the discussion topic	Holds no voting rights

*) Specifically, Human Capital & Compliance Director has special duties and responsibilities as regulated in the Committee's Work Guidelines
**) Adjusted to the topic of discussion

B. Business Value Chain (BVC) Sub-Committee

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Wholesale & International Banking Director/Institutional Banking Director/Enterprise & Commercial Banking Director	Holds voting rights
Secretary	Wholesale Transaction Product & Partnership Division Head (also permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member))	1. Digital & Integrated Transaction Banking Director 2. Retail Banking Director 3. Network & Services Director 4. SEVP Treasury	Holds voting rights
Permanent Member at the Division/Unit/Functional Unit level (Non-voting member)	1. Corporate Banking Division Head* 2. Institutional Banking Division Head* 3. Enterprise Banking Division Head* 4. International Banking & Financial Institutions Division Head* 5. Retail Productive Banking Division Head 6. Wealth Management Division Head 7. Consumer Segment Division Head 8. Distribution & Network Sales Division Head 9. Treasury Division Head 10. Corporate Planning & Performance Management Division Head	Holds no voting rights
Non-permanent Member (Non-voting member)	Sector Director/SEVP/Division Head/Unit/Functional Unit/ Regional Office/Branch/Center/Subsidiary Company related to the topic of discussion	Holds no voting rights

*) Adjusted to the topic of discussion

C. Marketing Strategy Sub-Committee (MKT)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Digital & Integrated Transaction Banking Director	Holds voting rights
Vice Chairman	Finance Director	Holds voting rights
Secretary	Marketing Communications Division (also a permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member))	1. Wholesale & International Banking Director/ Institutional Banking Director/Enterprise & Commercial Banking Director* 2. Retail Banking Director 3. Network & Services Director	Holds voting rights
Permanent Member at the Division/Unit/Functional Unit level (Non-voting member)	1. Corporate Banking Division Head* 2. Institutional Banking Division Head* 3. Enterprise Banking Division Head* 4. International Banking & Financial Institutions Division Head* 5. Commercial Banking Division Head* 6. Retail Productive Banking Division Head 7. Business Program Division Head 8. Consumer Product Division Head	Holds no voting rights

Position in the Committee	Filled In by	Voting Rights Status
	9. Consumer Segment Division Head 10. Card Business Division Head 11. Wealth Management Division Head 12. Retail Digital Product & Partnership Division Head 13. Retail Digital Channel Division Head 14. Wholesale Transaction Product & Partnership Division Head 15. Wholesale Digital Channel Division Head 16. Distribution Network & Sales Division Head 17. Corporate Planning & Performance Management Division Head 18. Corporate Secretary Division Head	
Non-permanent Member*	Sector Director/SEVP/Division Head/Unit Head/those related to the topic of discussion	Holds no voting rights

*) Adjusted to the topic of discussion

Term and Tenure

The tenure of the Business Committee members is determined in alignment with their respective structural terms within BNI.

Profile of the Chairperson and Members of the Business Committee

Comprehensive information regarding the profiles of the Business Committee members has been detailed in the Company Profile Chapter, specifically under the Subchapter on the Board of Directors' Profile, the Subchapter on the Senior Executive Vice President (SEVP) Profile, and the Subchapter on Executive Officers.

Business Committee Certification

BNI ensures that all personnel of the Business Committee meet the required qualifications and competency certifications in accordance with applicable regulations. In 2024, the Business Committee successfully completed the designated certification programs.

Statement of Independence of the Business Committee

All members of the Business Committee affirm their commitment and capability to fulfill their duties and responsibilities objectively and independently, ensuring they remain free from any conflicts of interest that could potentially harm the Bank in the future. The Business Committee's Statement of Independence has been documented in the Integrity Pact, which is periodically updated and signed by all committee personnel.

Business Committee Meetings

Meeting Implementation Policy

1. The Sub-Committees convene meetings at predetermined locations, times, and dates to allow all members to manage their attendance. The meeting frequency is as follows:
   a. The Product Sub-Committee holds meetings at least once every six months (semester) and/or as needed.
   b. The Business Value Chain Sub-Committee holds meetings at least four times a year and/or as needed for selected customers/debtors/prospective customers/prospective debtors.
   c. The Marketing Strategy Sub-Committee holds meetings at least three times a year and/or as needed.
2. If the Chairperson and Deputy Chairperson are unable to attend, a Replacement Chairperson may be appointed through the Substitute Director mechanism or by issuing an assignment letter.
3. The Sub-Committees may schedule ad hoc meetings when urgent issues requiring immediate decisions arise. Decisions from the Sub-Committees are then executed through the Sub-Committee Secretary. Additionally, the Sub-Committees may hold limited meetings with relevant Divisions/Units to formulate operational policies that align with established Sub-Committee policies.
4. A quorum is met if more than half of the permanent members at the Board of Directors and SEVP level are present, including the attendance of the Chairperson and/or Deputy Chairperson of the Sub-Committee. Specifically, for the Marketing Strategy Sub-Committee, a quorum is met when at least three members at the Board of Directors level are present, including the Chairperson and/or Vice Chairman of the Sub-Committee.

Meeting Frequency and Attendance

A. Product Sub-Committee (PRC)

In 2024, BNI held five Product Sub-Committee (PRC) meetings attended by the Board of Directors and committee members. Detailed information regarding the execution of PRC meetings and the attendance rate of committee members is presented in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)	Notes
1	January 10, 2024	Discussion of savings and consumer business achievement strategies	100%	Product life cycle discussion
2	March 27, 2024	Discussion of Bank Product Implementation Plan March 2024	-	Carried out in a circular manner
3	June 14, 2024	Discussion of Bank Product Implementation Plan June 2024	100%	In conjunction with the Board of Directors Meeting, the proposed revision of the RBB
4	September 26, 2024	Discussion of Bank Product Implementation Plan September 2024	-	Carried out in a circular manner
5	November 4, 2024	Discussion of Bank Product Implementation Plan 2025	100%	Conducted together with the Board of Directors Meeting for the Proposal of RBB, RKAP and RKAB

B. Business Value Chain (BVC) Sub-Committee

In 2024, BNI has held 6 BVC Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of BVC Sub-Committee Meetings and the level of attendance of committee members in these meetings is described in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 30, 2024	• TAP Quality (Wallet sizing & Target setting) • Action Plan Update • Focus Details per TAP Client (Semen Indonesia, PLN, Astra Group, Pupuk Indonesia, Pertamina)	100%
2	February 20, 2024	• Leads Value Chain • TAP Template • Focus Details per TAP Client (Semen Indonesia, PLN, Astra Group, Pupuk Indonesia, Pertamina)	100%
3	March 26, 2024	• TAP Dashboard • Customer Detail Dashboard • TAP Template	100%
4	July 12, 2024	• Flexibility (proposed rate 8%) corporate and certain levels • General and special SCF schemes • Prefin on 5 TAP Groups • 0% SCF Guarantee for new schemes with additional entities on 5 TAP Priorities • Updated SCF schemes that apply • Addition of Digital Loan limit: CRS Assessment	100%
5	August 30, 2024	• Socialization of Product Knowledge - SCF to the regions • Socialization of tools for segment transfer mechanisms to all Region • Change in the weight of Realization of value chain on KPI Region • Action item on the trend of decreasing Debit Balance of top 5 Groups	100%
6	October 15, 2024	• Portfolio RPB vs Realization of DNS value chain execution • Leads Top Priority Clients cleansing • Portfolio CRS CRD vs Realization of execution of leads	100%

C. Marketing Strategy (MKT) Sub-Committee

In 2024, BNI has held 5 (five) MKT Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of the MKT Sub-Committee Meeting and the level of attendance of committee members in the meeting is described in the following table:

No	Date	Meeting Agenda	Attendance Quorum
1	February 28, 2024	BNI Wide Promotion Cost Allocation Proposal 2024	100%
2	June 11, 2024	Brands Concept Group Collaboration	100%
3	July 12, 2024	BNI Expo 2024 Sponsorship Budget Allocation Proposal	100%
4	October 25, 2024	• Customer Gathering Budget Allocation Proposal • Sponsorship Budget Allocation Proposal • Product Awareness Budget Material Presentation	100%
5	November 4, 2024	Marketing Budget Realization Submission	100%

Training and/or Competency Enhancement of the Business Committee in 2024

In 2024, all personnel of the Business Committee participated in various training, seminars, and workshops to maintain their expertise and competencies, ensuring effective execution of daily responsibilities. Information regarding these activities is detailed in the Company Profile chapter, under the sub-chapter on Competency Development Policy, specifically in the section titled "Competency Development Based on Job Levels and Gender Equality in 2024." Additionally, relevant information is presented in the Corporate Governance chapter, under the sub-chapter on the Board of Directors, in the section titled "Training and/or Competency Enhancement."

Execution of Duties by the Business Sub-Committees in 2024

A. Product Sub-Committee (PRC)

In 2024, the PRC Sub-Committee carried out its duties and responsibilities in accordance with its functions and successfully implemented all planned work programs, including:

1. Monitoring and reporting on the realization of the Bank's Product Implementation Plan for March 2024.
2. Monitoring and reporting on the realization of the Bank's Product Implementation Plan for June 2024.
3. Monitoring and reporting on the realization of the Bank's Product Implementation Plan for September 2024.
4. Submission of the Bank's Product Implementation Plan for 2025.

B. Business Value Chain (BVC) Sub-Committee

Throughout 2024, the Business Value Chain (BVC) Sub-Committee has carried out its duties in accordance with its assigned responsibilities.

C. Marketing Strategy (MKT) Sub-Committee

Throughout 2024, the MKT Sub-Committee has implemented the following work programs:

1. Determining the size of the marketing strategy.
2. Prioritizing marketing strategy initiatives.
3. Reviewing plans and monitoring the realization of marketing strategies.

Business Committee Work Plan for 2025

A. Product Sub-Committee (PRC)

The PRC Sub-Committee has prepared a work plan for 2025, as follows:

1. Evaluation of the progress of Bank Product Development for the September 2024 Period & Bank Product Implementation Plan for the March 2025 Period.
2. Evaluation of the progress of Bank Product Development for the March 2025 Period & Discussion of the Bank Product Implementation Plan for the June 2025 Period.
3. Evaluation of the progress of Bank Product Development for the June 2025 Period & Bank Product Implementation Plan for the September 2025 Period.
4. Evaluation of the progress of Bank Product Development for the September 2025 Period Submission of the Bank Product Implementation Plan for 2026.

B. Business Value Chain (BVC) Sub-Committee

The Business Value Chain (BVC) Sub-Committee has prepared a work plan for 2025 with a focus on determining the scale strategy related to the execution of the selected customer/debtor/potential customer/potential debtor business ecosystem along with its value chain.

C. Marketing Strategy (MKT) Sub-Committee

The MKT Sub-Committee has prepared a work plan for 2025, in line with its duties and responsibilities, as follows:

1. Determining the scale of BNI's marketing and corporate branding strategy in 2025.
2. Prioritizing BNI's marketing and corporate branding strategy initiatives that have a significant impact on BNI's business and business activities, in line with BNI's planning and budgeting in 2025.

Performance Management Committee (PMC)

BNI has established a Performance Management Committee (PMC) as one of the permanent committees under the Board of Directors which functions as a forum for managing the Bank's budget monitoring policies and plays an important role in supporting the smooth running of the performance management process at BNI to ensure alignment of strategic planning, facilitate the target setting process and performance assessment. The establishment of this committee refers to the Decree of the Board of Directors No. KP/353/DIR/R dated June 21, 2017 concerning Arrangement (PMC) and changes have been made to the composition of the PMC membership cfm. Memo No. CDV/2/1515/R dated December 20, 2023 concerning Update Performance Management Committee (PMC).

Performance Management Committee Charter

All PMC members are required to carry out their duties and responsibilities professionally and

independently in order to achieve the Bank's targets by referring to the matters stipulated in the Performance Management Committee Charter. These guidelines have been stipulated by the Board of Directors through Decree of the Board of Directors No. KP/353/DIR/R dated June 21, 2017. The Performance Management Committee Charter is reviewed periodically, and if necessary, can be updated later in accordance with developments/ changes in applicable legal regulations.

Duties and Responsibilities of the Performance Management Committee

The description of the duties of the BNI PMC are as follows:

1. **Strategic Planning**
   a. Reviewing and ensuring alignment between the Corporate Plan, General Policy of the Board of Directors, the Bank's Business Plan and Budget Determination, and suggesting adjustments if necessary;
   b. Reviewing and approving the Bank's strategy and recommending changes to the Corporate Plan/Bank's Business Plan;
   c. Reviewing the performance review process that is carried out periodically.

2. **Target Setting**
   a. Approving and setting the annual schedule (timeline) and being responsible for Planning & Budgeting.
   b. Supervising and monitoring the progress of Planning & Budgeting activities.
   c. Reviewing and approving the suggested targets and/or budget adjustments (forecasting).
   d. Deciding on Capex proposals with certain criteria (business cases).

3. **Performance Assessment**
   a. Review, provide insight and approve KPI at the Sectoral and Division/Unit/Functional Unit levels.
   b. Review and provide recommendations for BNI BOD KPI.
   c. Provide recommendations to Sectoral & Division/Unit/Functional Unit in terms of determining and cascading (decreasing) KPI and targets.
   d. Review the process of implementing performance management on an ongoing basis.
   e. Provide recommendations for policy amendment initiatives to improve the effectiveness of performance management.
   f. Review and decide on the PMS score for the Q4 period (while for the PMS Score for the Q1, Q2, and Q3 periods, the review and decision are carried out by the Director who supervises the PMS function).
   g. Act as an arbitration institution for issues related to performance measurement.

Structure and Membership of the Performance Management Committee

The Performance Management Committee (PMC) consists of members of the Board of Directors, along with Executive Officers one level below the Board who are appointed to serve. The structure and membership of the Performance Management Committee are determined by a Board of Directors Decree, which also serves as the official assignment of the Chairperson, Deputy Chairperson, and Committee Members.

As of December 31, 2024, the structure, membership, and voting rights status of the PMC, based on Memo CDV No. CDV/2/1515/R dated December 20, 2023, are as follows:

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Corporate Planning & Performance Management Division Head (concurrently Permanent Member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member)	All Board of Directors & SEVP Members	Holds voting rights
Permanent Member at the Board of Directors level (Non-voting member)	Human Capital & Compliance Director*	Holds no voting rights
Permanent Member at the Division/Unit/Functional Unit level (Non-voting member)	1. Corporate Planning & Performance Management Division Head 2. Distribution Network & Sales Division Head 3. Human Capital Strategy Division 4. Treasury Division Head 5. Data Management & Analytics Division Head 6. Internal Audit Unit Head	Holds no voting rights
Non Permanent Member (Non-voting member)	Division Head/Unit/Functional Unit related to the topic of discussion.	Holds no voting rights

*) Specifically, Human Capital & ComplianceDirector has special duties and responsibilities as regulated in the Committee's Work Guidelines.

Term and Tenure of the Performance Management Committee

The tenure of PMC membership follows the respective structural terms of office within BNI.

Profile of the Chairperson and Members of the Performance Management Committee

Comprehensive information on the profiles of PMC members is provided in the Company Profile chapter, specifically in the sub-chapters on the Board of Directors' Profile, Senior Executive Vice President (SEVP) Profile, and Executive Officers Profile.

Certification of the Performance Management Committee

BNI ensures that all PMC personnel meet the required qualification and competency certification standards in accordance with applicable regulations. In 2024, PMC members have participated in a certification program.

Independence Statement of the Performance Management Committee

All PMC members declare their ability and commitment to fulfilling their duties and responsibilities in compliance with prevailing regulations and Good Corporate Governance (GCG) principles.

Meetings of the Performance Management Committee

Meeting Policy

The policies and procedures governing PMC meetings at BNI are as follows:

1. The Committee holds meetings at least once every six months (semester) or as needed, at a predetermined venue, date, and time, allowing all members to schedule their attendance accordingly.
2. If the Chairperson and Deputy Chairperson are unable to attend, an Acting Chairperson may be appointed through a Substitute Director mechanism or by issuing an assignment letter.
3. The Committee may schedule additional meetings beyond the regular sessions, as follows:
   a. Conducting emergency meetings to address urgent matters requiring immediate resolution. Decisions made by the Sub-Committee will be implemented through the Sub-Committee Secretary.
   b. Holding limited meetings with relevant Divisions/Units/Functional Groups to formulate operational policies aligned with the established Committee policies
4. If necessary, the Committee has the right to invite other Divisions/Units/Functional Groups outside the Committee members to attend meetings as resource persons for specific discussions relevant to their expertise.
5. A quorum for Committee meetings is achieved when at least more than half of the permanent members at the Board of Directors & SEVP level are present, including the attendance of the Chairperson and/or Deputy Chairperson.

Meeting Frequency and Attendance Rate

In 2024, BNI held 12 (twelve) PMC Committee meetings attended by the Board of Directors and committee members. Detailed information regarding PMC Committee meetings and the attendance rate of its members is outlined in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	February 6, 2024	Scorecard Finalization Q4/2023	83%
2	February 19, 2024	Scorecard Finalization Q4/2023	100%
3	February 7, 2024	Implementation of Performance Review	75%
4	March 8, 2024	Business Meeting	100%
5	April 22, 2024	Financial Performance Q1 2024	83%
6	June 24, 2024	Prognosis and Achievement June 2024	100%
7	July 9, 2024	Financial Performance Q2 2024	100%
8	August 12, 2024	Implementation of Performance Review July 2024	100%
9	September 17, 2024	Financial Performance August 2024	78%
10	October 7, 2024	Financial Performance Q3 2024	83%
11	November 4, 2024	Approval of RKAP 2025, RBB 2025-2027, RKAB 2025, and RJPP 2025-2029	100%
12	November 25, 2024	Implementation of Performance Review	92%

Training and/or Competency Enhancement of the Performance Management Committee in 202

In 2024, all PMC personnel participated in various training programs, seminars, and workshops to maintain their expertise and competencies in supporting their daily responsibilities. Detailed information on this matter is outlined in the Company Profile chapter, under the sub-chapter on Competency Development Policy, in the section titled Competency Development Based on Job Level and Gender Equality in 2024, as well as in the Corporate Governance chapter, under the sub-chapter on the Board of Directors, in the section titled Training and/or Competency Enhancement.

Performance Management Committee Activities in 2024

Throughout 2024, BNI's PMC undertook several initiatives and implemented work programs, including:

1. Reviewing and ensuring alignment between the Corporate Plan, the Board of Directors' General Policy, the Bank's Business Plan, and Budget Allocation.
2. Approving the RBB (Bank Business Plan) and RKAP (Work Plan and Budget) for 2025–2027.
3. Supervising and monitoring developments in Planning & Budgeting activities.
4. Reviewing the periodic performance evaluation process.
5. Providing recommendations on the determination and cascading of KPIs and targets for 2024.
6. Reviewing and finalizing the PMS (Performance Management System) scores for Q4 2023.

Work Plan of the Performance Management Committee for 2025

PMC has outlined its work plan for 2025, focusing on the following strategic priorities:

1. Conducting a review of the 2025 RBB and RKAP.
2. Conducting Monthly Performance Reviews for 2025.
3. Reviewing and ensuring the alignment of KPIs with the Bank-wide strategy and targets for 2025.
4. Reviewing and evaluating PMS scores for Q1, Q2, and Q3.
5. Reviewing and finalizing the PMS scores for Q4 2024.
6. Reviewing and approving the RBB and RKAP for 2026–2028.

Technology Management Committee (KMT)

To assist the Board of Commissioners and the Board of Directors in overseeing Information Technology (IT) development activities, BNI established the Technology Management Committee (KMT) through the Board of Directors Decree No. KP/364/DIR/R dated August 13, 2021, concerning the Structuring of the Technology Management Committee (KMT). KMT is a permanent committee at BNI, authorized to provide recommendations to the Board of Directors regarding the formulation and establishment of IT development policies and strategies.

Technology Management Committee Charter

KMT operates under a formal Technology Management Committee Charter, which serves as a mandatory guideline for all committee members in performing their duties. This guideline is reviewed and updated periodically to ensure alignment with applicable regulations and the Bank's needs. The KMT Charter was last updated in 2021 and formalized through Board of Directors Decree No. KP/364/DIR/R dated August 13, 2021, with further revisions documented in Memo CDV No. CDV/2/1209/R dated December 23, 2024.

Duties and Responsibilities of the Technology Management Committee

BNI's KMT is responsible for key areas, including:

1. **IT Strategy and Policy Formulation**
   a. Provide recommendations regarding the formulation of key IT policies, standards and procedures, particularly related to aspects of IT system development and procurement, IT operational activities and communication networks, information security, end user computing, e-banking, use of IT service providers, and implementation of BNI IT use risk management.
   b. Provide recommendations regarding the Information Technology Strategic Plan (RSTI) and the Information Technology Development Plan (RPTI) that are in line with BNI's strategic business plan, taking into account factors of efficiency, effectiveness and implementation plan (roadmap), required resources, and costs and benefits that will be obtained when the plan is established.
   c. Conduct evaluations and recommendations on the conformity of approved projects with the Information Technology Strategic Plan (RSTI) and Information Technology Development Plan (RPTI).
   d. Approving budget recommendations for IT and information security.
   e. Establishing IT strategic plans.
   f. Defining policies, standards, and procedures for IT implementation and usage.
2. **IT Project Portfolio Management**
   a. Evaluating the IT project portfolio, including proposed projects, approved projects, ongoing projects, and completed projects.
   b. Determining the priority status of critical IT projects with significant operational impact.
   c. Making decisions on the continuation, de-prioritization, or termination of projects.
   d. Assessing the adequacy and allocation of resources for IT projects.
   e. Monitoring project execution to ensure timelines and resource requirements are met.
   f. Evaluating and recommending solutions for high-risk or problematic projects.
   g. Reviewing financial aspects of ongoing IT projects, including *total project cost, profit & loss analysis, and budget realization.*
3. **IT Risk Management**
   a. Recommending measures to minimize risks associated with BNI's IT investments, ensuring they contribute to the Bank's business objectives.
   b. Evaluating and advising on the resolution of IT-related issues that cannot be addressed by operational IT units.
   c. Identifying key issues, mitigation plans, and required next steps/actions.
4. **IT Performance Measurement and Evaluation**
   a. Assessing IT alignment with the Bank's Management Information System (MIS) requirements.
   b. Conduct evaluations and recommendations regarding the conformity between the implementation of IT projects and the agreed project plan (project charter).
   c. Monitoring IT performance and recommending improvement measures.

Structure and Membership of the Technology Management Committee

KMT comprises all members of the Board of Directors, along with designated Executive Officers one level below the Board. The structure of BNI's KMT is determined based on its Terms of Reference (TOR), which also serves as the official designation of the Chairman, Deputy Chairman, and Committee Members.

Based on Memo CDV/2/1209/R dated December 23, 2024, regarding the Updating of the Technology Management Committee (KMT) Board of Directors Decree, the structure, membership, and voting rights status of KMT as of December 31, 2024, are as follows:

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Technology & Operations Director	Holds voting rights
Secretary	IT Strategy & Architecture Division Head (concurrently serves as a non-voting Permanent Member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member)	1. Deputy President Director 2. Wholesale & International Banking Director 3. Enterprise & Commercial Banking Director 4. Risk Management Director 5. Finance Director 6. Network & Services Director 7. Retail Banking Director 8. Digital & Integrated Transaction Banking Director 9. SEVP Information Technology 10. SEVP Treasury 11. SEVP Remedial & Recovery 12. SEVP Operations 13. SEVP Retail Digital Solutions	Holds voting rights
Permanent Member at the Board of Directors level (Non-voting member)	Human Capital & Compliance Director*	Holds no voting rights
Permanent Member at the Division/Unit/Functional Unit level (Non-voting member)	1. IT Strategy & Architecture Division Head 2. Application Development Division Head 3. Wholesale Digital Delivery Division Head 4. Retail Digital Delivery Division Head 5. IT Application Services Division Head 6. IT Infrastructure Management Division Head 7. CISO Division Head 8. Data Management & Analytics Division Head 9. Retail Digital Channel Division Head 10. Wholesale Digital Channel Division Head 11. Corporate Development & Transformation Division Head 12. Enterprise Risk Management Division Head 13. Head of Compliance Division Head 14. Human Capital Business Partner 15. Corporate Planning & Performance Management Division Head 16. Procurement & Fixed Assets Division Head 17. Internal Audit Unit Head 18. Senior Operational Risk Executive Technology, Digital Operations	Holds no voting rights
Non Permanent Member (Non-voting member)	Division Head/Unit Heads and Directors of Subsidiaries related to the topics discussed	Holds no voting rights

*) Specifically, Human Capital & Compliance Director has special duties and responsibilities as regulated in the committee's work guidelines.

Term and Tenure of the Technology Management Committee

In accordance with the charter established through Director's Decree No. KP/364/DIR/R dated August 13, 2021, and updated via Memo CDV No. CDV/2/1209/R dated December 23, 2024, the tenure of KMT membership follows the term of office in the structural positions at BNI.

Profile of the Chairperson and Members of the Technology Management Committee

Comprehensive information regarding the profiles of KMT members is provided in the Company Profile chapter, under the sub-chapters: Profile of the Board of Directors, Profile of Senior Executive Vice Presidents (SEVPs), and Profile of Executive Officers.

Certification of the Technology Management Committee

BNI ensures that all KMT personnel meet the required qualification and competency certification standards in accordance with applicable regulations.

In 2024, KMT members have participated in certification programs. Detailed information regarding the certification and training of KMT voting members is outlined in the Training and/or Competency Development of Board Members in 2024.

Independence Statement of the Technology Management Committee

BNI guarantees that all KMT members meet the required independence criteria and are capable of carrying out their duties independently, upholding the best interests of the Bank, and remaining free from any external influence. The KMT independence statement is an integral part of the Board of Directors' Integrity Pact, which is elaborated in the chapter on the Integrity Pact of the Board of Directors.

Meetings of the Technology Management Committee

Meeting Implementation Policy

The policies and procedures for conducting KMT meetings at BNI are as follows:

a. Committee Meetings
   1. The committee shall convene meetings at least four (4) times a year.
   2. Additional meetings may be held beyond the standard schedule under the following circumstances:
      i. Emergency meetings may be convened when critical issues require immediate resolution. Decisions made by the committee shall be executed through the Committee Secretary.
      ii. Limited meetings may be conducted with relevant Divisions/Units to formulate operational policies aligned with the committee's established policies.
   3. If necessary, the committee may invite other Divisions/Units outside the committee members to attend meetings as subject matter experts for specific discussions within their area of expertise.

b. Meeting Quorum
   A meeting quorum is achieved when more than half (>50%) of the permanent members (voting members) at the Director and SEVP level are present, including the Chairperson and/or Vice Chairman of the Committee.

Meeting Frequency and Attendance Rate

In 2024, BNI conducted 8 (eight) KMT committee meetings attended by Directors and committee members. Further details regarding the KMT Committee meetings and the attendance rate of committee members are provided in the following table:

No.	Date	Meeting Agenda	Quorum (%)
1	January 22, 2024	IT Planning 2024: IT Project Portfolio 2024	100%
2	February 26, 2024	Update on BNI's New Data Center	100%
3	March 25, 2024	Standardization & Centralization of the Overseas Branches' System	100%
4	April 299, 2024	IT Project Implementation & CAPEX Realization Progress for Q1 2024	93%
5	August 19, 2024	• IT Project Implementation & CAPEX Realization Progress for Q2 2024 • Enterprise Collaboration Platform • Core Banking Optimization	93%
6	November 04, 2024	Approval of the IT Strategic Plan (ITSP) 2024 - 2028	100%
7	December 02, 2024	• wondr Incident Report • Core Banking Optimization Update • IT Project & IT CAPEX for 2024 & 2025	100%
8	December16, 2024	Operational Preparations for the Year-End and New Year Holidays	100%

Training and/or Competency Enhancement for the Technology Management Committee in 2024

In 2024, the Chairperson and members of the Technology Management Committee (KMT) participated in various training programs, seminars, and workshops to maintain their expertise and competencies in support of their daily responsibilities. Detailed information on this matter is provided in the Company Profile Chapter, under the subchapter Competency Development Policy, in the discussion titled Competency Development Based on Job Level and Gender Equality in 2024. Additionally, it is elaborated in the Corporate Governance Chapter, under the subchapter Board of Directors, in the discussion titled Training and/or Competency Enhancement.

Implementation of the Technology Management Committee's Duties in 2024

Throughout 2024, BNI's Technology Management Committee (KMT) carried out various activities and implemented work programs in accordance with its assigned duties and responsibilities.

Technology Management Committee's Work Plan for 2025

The Technology Management Committee (KMT) has outlined its work plan for 2025, prioritizing the following strategic areas:

1. IT Planning 2025: IT Project Portfolio
2. IT Operation Updates for H1 2025
3. IT Project Implementation and CAPEX Realization Progress for H2 2025
4. IT Operation Updates for H2 2025

Credit Policy Committee (KRB)

The Credit Policy Committee (KRB) is a standing committee under the Board of Directors with the authority and function of providing recommendations regarding the formulation of the Bank's Credit Policy. Over time, the committee has undergone restructuring through Board of Directors Decree No. KP/170/DIR/R dated April 29, 2024, regarding the Restructuring of the Credit Policy Committee (KRB). This restructuring involved migrating the Business Sub-Committee out of KRB, refining the description of the Committee's Duties and Responsibilities, and updating the committee's name to Credit Policy Committee, which remains in use today.

As a result of the restructuring in 2024, the Credit Policy Committee (KRB) at BNI is now divided into two sub-committees:

A. Credit Policy Sub-Committee (KKP)
B. Credit Procedures Sub-Committee (KPP)

Credit Policy Committee Charter

To enhance the effectiveness of the Credit Policy Committee's duties and responsibilities, BNI has established the Credit Policy Committee Charter, which was formalized through Board of Directors Decree No. KP/170/DIR/R dated April 29, 2024. This charter is periodically reviewed and updated in accordance with applicable legal and regulatory developments.

Duties and Responsibilities of the Credit Policy Committee

A. Credit Policy Sub-Committee (KKP)

The Credit Policy Sub-Committee (KKP) is responsible for the following key tasks:

1. Establishing the Bank's Credit Policy (KPB), particularly in relation to prudential credit principles, for submission to the Board of Commissioners for approval.
2. Ensuring the consistent and effective implementation of the Bank's Credit Policy while reviewing any obstacles or challenges in its application.
3. Conducting periodic reviews of the Bank's Credit Policy at least once every three years and making necessary amendments or improvements.
4. Monitoring and evaluating the following aspects:
   a. The overall development and quality of the credit portfolio.
   b. The proper exercise of credit approval authority.
   c. The accuracy of credit granting processes, particularly for related parties and large corporate debtors.
   d. Compliance with Legal Lending Limits (BMPK), Good Corporate Governance (GCG), and Risk Management Implementation.
   e. Adherence to regulatory and legal provisions in credit operations.
   f. The resolution of non-performing loans in line with the Bank's Credit Policy.
   g. The Bank's efforts in maintaining an adequate level of credit loss provisions.
5. Submitting periodic written reports to the Board of Commissioners regarding the supervision and evaluation of the implementation of the Bank's Credit Policy, and the results of monitoring and evaluation regarding the matters referred to in point 4 (four) above;
6. Developing and recommending improvements for the execution of the Bank's credit activities.

B. Credit Procedures Sub-Committee (KPP)

The Credit Procedures Sub-Committee (KPP) at BNI is tasked with the following core functions:

1. Establishing credit procedures and operational guidelines.
2. Defining the Lending Model, which refers to specific operational policies and credit procedures tailored for particular market segments, industries, or regions while adhering to prudential banking principles and Good Corporate Governance (GCG).
3. Formulating procedures and operational guidelines for Treasury, International Business, and Financial Institutions.

Structure and Membership of the Credit Policy Committee

The Credit Policy Committee (KRB) comprises members from the Board of Directors, along with executive officers one level below the Board, who are appointed by decree. The membership structure of KRB is formalized through a Board of Directors Decree, which also determines the roles of the Chairperson, Vice Chairperson, and Committee Members.

As of December 31, 2024, the structure, membership, and voting rights within the Credit Policy Committee are outlined in Board of Directors Decree No. KP/170/DIR/R dated April 29, 2024, regarding the Restructuring of the Credit Policy Committee (KRB):

A. Credit Policy Sub-Committee (KKP)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Policy Governance Division Head (also permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member)	1. Wholesale & International Banking Director 2. Retail Banking Director 3. Enterprise & Commercial Banking Director 4. Network & Services Director 5. Risk Management Director 6. Technology & Operations Director 7. SEVP Remedial & Recovery	Holds voting rights

Position in the Committee	Filled In by	Voting Rights Status
Permanent Member at the Board of Directors level (Non-voting member)	Human Capital & Compliance Director*	Holds no voting rights
Permanent Member at the Division/Unit/Functional Unit level (Non-voting member)	1. Enterprise Risk Management Division Head 2. Operational Risk Management Division Head 3. Compliance Division Head 4. Internal Audit Unit Head	Holds no voting rights
Non Permanent Member (Non-voting member	Sector Director/SEVP/Division Head/Unit/Functional Unit related to the topic of discussion	Holds no voting rights

*) Specifically, Human Capital & Compliance Director has special duties and responsibilities as regulated in the Committee's Work Guidelines.

B. Credit Procedure Sub-Committee (KPP)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Human Capital & Compliance Director	Holds voting rights
Secretary	Policy Governance Division Head (also a permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member)	1. Risk Management Director Director 2. Sector Director (in accordance with the proposing unit and/or according to the discussion topic) 3. SEVP Operations	Holds voting rights
Permanent Member at the Board of Directors level (Non-voting member)	1. Enterprise Risk Management Division Head 2. Operational Risk Management Division 3. Compliance Division Head 4. Internal Audit Unit Head 5. Credit Operations Division Head** 6. Banking Operations Division Head** 7. Division Head/Unit/Unit related to the meeting material	Holds no voting rights
Non Permanent Member (Non-voting member	Sector Director/SEVP/Division Head/Unit Head related to the topic of discussion	Holds no voting rights

**) Units that have functions in accordance with the topic of discussion.

Term and Duration of Service for the Credit Policy Committee

The tenure of the members of the Credit Policy Sub-Committee (KKP) is determined in alignment with their respective structural terms at BNI.

Profile of the Chairperson and Members of the Credit Policy Committee

Comprehensive information on the profiles of the members of the Credit Policy Committee (KKP) is detailed in the Company Profile Chapter, under the subchapters Profile of the Board of Directors, Profile of the Senior Executive Vice President (SEVP), and Profile of Executive Officers.

Certification of the Credit Policy Committee

BNI ensures that all personnel of the Credit Policy Committee meet the required qualification standards and competency certifications in accordance with prevailing regulations. In 2024, the Credit Policy Committee participated in a certification program.

Independence Statement of the Credit Policy Committee

The Credit Policy Committee is fully capable of performing its duties, responsibilities, and authority professionally and independently, without interference from any party that is not in accordance with applicable laws and regulations. All members of the Credit Policy Committee declare that they meet the independence criteria and are capable of carrying out their responsibilities independently, upholding the best interests of the Bank, and remaining uninfluenced by any external party. The Independence Statement of the Credit Policy Committee is disclosed in the Integrity Pact, which is periodically updated and signed by all committee personnel.

Meetings of the Credit Policy Committee

Meeting Implementation Policy

The policies and procedures for conducting Credit Policy Committee meetings are as follows:

1. The sub-committees hold meetings at designated locations, times, and dates to allow all members to arrange their attendance. The meeting frequency is as follows:
   a. The Credit Policy Sub-Committee (KKP) meets at least once a year or as needed.
   b. The Credit Procedures Sub-Committee (KPP) meets at least once every three months or as needed.
2. If the Chairperson and Vice Chairperson are unable to attend, a Substitute Chairperson may be appointed through a Replacement Director mechanism or by issuing an assignment letter.
3. If necessary, the sub-committee has the right to invite divisions or units outside the sub-committee to attend meetings as resource persons to discuss specific issues relevant to their expertise.
4. The sub-committee may schedule urgent meetings when required to address critical issues that need immediate decisions. Decisions made by the sub-committee are implemented through the Sub-Committee Secretary. Additionally, the sub-committee may hold limited meetings with relevant divisions or units to formulate operational policies that align with established sub-committee policies.
5. A quorum is achieved if more than half of the permanent members at the Board of Directors and SEVP level are present, including the presence of the Chairperson and/or Vice Chairperson of the sub-committee.

Meeting Frequency and Attendance

A. Credit Policy Sub-Committee (KKP)

In 2024, BNI held one meeting of the Credit Policy Sub-Committee (KKP), attended by the Board of Directors and committee members. More detailed information regarding the implementation of the KKP Sub-Committee Meeting and the attendance level of committee members is presented in the following table:

No	Date	Meeting Agenda	Attendance Quorum
1	June 14, 2024	Bank Credit Policy Review (KPB) - 2024	100%

B. Credit Procedure Sub-Committee (KPP)

In 2024, BNI held 14 KPP Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of KPP Sub-Committee Meetings and the level of attendance of committee members in these meetings is described in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 2, 2024	Review of Investment Credit Facility Provisions for Plantation Core Partnership Scheme Plasma	100%
2	February 2, 2024	Review of Credit Granting Period & Credit Restructuring Period	100%
3	February 7, 2024	Temporary Individual Decision-Making Authority for Business Banking Credit Decision Officials and Remedial & Recovery in Corporate, Enterprise, Commercial, Retail Productive and Consumer Segments	100%
4	February 21, 2024	Review of Collateral CEF in the Form of Counter Guarantee from Credit Insurance Companies/Credit Guarantees or Similar Products and Review of CEV Controlled Fulfillment in Calculation of Collateral Adequacy Requirements for Working Capital Credit (KMK) or Other Working Capital	100%
5	March 22, 2024	Credit Procedure Committee (KPP) Regarding Review of Facility Grant Procedures through the Supply Chain Financing (SCF) Scheme	100%
6	May 26, 2024	Credit Procedure Committee (KPP) Bond Collateral Credit (BCC) Facility Provisions	100%
7	June 19, 2024	Review of Foreign Exchange Transaction Provisions with Customers	100%
8	May 8, 2024	Review of Counterparty Limit Facility Provisions for Financial Institutions (Banks)	100%
9	August 21, 2024	Use of Dollar Value 01 (DV01) as the Basis for Calculating Open Position Limit for Fair Value Through Profit and Loss (FVTPL) Securities Transactions Review of Transaction Authority	100%

No.	Date	Meeting Agenda	Attendance Quorum (%)
10	August 27, 2024	Committee Credit Procedure (KPP) Provisions for Calculation of Non-IMB/PBG Buildings as Collateral and Binding of Collateral for Inventory and Receivables outside Notarial Fiduciary in the Retail Productive Segment	100%
11	September 23, 2024	Review and Preparation of Depo+ (DepoPlus) and Digital Options Transaction Provisions	100%
12	November 6, 2024	Review of CMOB PP regarding Write-off of Non-Principal Interest and Costs (BDO)	100%
13	November 8, 2024	Authority to Decide on Credit Restructuring in the Remedial & Recovery Unit of the Retail Productive Segment	100%
14	November 20, 2024	Credit Procedure Committee (KPP) regarding Review of Non-Bank Financial Institution (NBFI) Company Guidelines	100%

Training and Competency Enhancement of the Credit Policy Committee in 2024

In 2024, the Chairperson and members of the Credit Policy Committee participated in various training programs, seminars, and workshops to maintain their expertise and competencies in supporting their daily responsibilities. Detailed information on this matter is outlined in the Company Profile Chapter, under the subchapter on Competency Development Policy, in the discussion titled Competency Development Based on Job Level and Gender Equality in 2024. Additionally, relevant details are included in the Corporate Governance Chapter, under the subchapter on the Board of Directors, in the discussion titled Training and Competency Enhancement.

Implementation of the Credit Policy Committee's Duties in 2024

A. Credit Policy Sub-Committee (KKP)

In 2024, the Credit Policy Sub-Committee (KKP) carried out its duties and responsibilities in accordance with its functions, while taking into account market conditions and the principles of prudence.

B. Credit Procedures Sub-Committee (KPP)

Throughout 2024, the Credit Procedures Sub-Committee (KPP) executed its responsibilities and implemented its work programs in line with its designated duties.

Work Plan of the Credit Policy Committee for 2025

A. Credit Policy Sub-Committee (KKP)

The Credit Policy Sub-Committee (KKP) has prepared its work plan for 2025, which includes the following key focus areas

1. Collateral Adequacy Ratio and Self-Financing
2. Credit Tenure
3. Consultation with the Board of Commissioners
4. Non-Principal Write-Offs
5. Installment-Based Loan Repayment
6. House Limit
7. Clean Basis and Negative Pledge
8. Exceptions to Credit Policy.

B. Credit Procedures Sub-Committee (KPP)

The Credit Procedures Sub-Committee (KPP) has set its work plan for 2025, which includes a review of credit procedures.

Human Capital Committee (KHC)

The Human Capital Committee (KHC) is one of BNI's permanent committees, authorized to formulate human capital management strategies aligned with BNI's vision, mission, and strategy to develop high-performing and competent human resources.

The Human Capital Committee consists of two sub-committees:

A. Human Capital Strategy & Policy Sub-Committee (HSP)
B. Executive Talent Sub-Committee (ETC)

Human Capital Committee Charter

The Human Capital Committee (KHC) operates under a charter that defines its membership, structure, authority, duties, responsibilities, meetings, activities, and governance procedures. The KHC Charter was established by the Board of Directors through Decree No. KP/351/DIR/R dated August 15, 2024, and is periodically reviewed to ensure alignment with prevailing regulations and the Bank's needs.

Duties and Responsibilities of the Human Capital Committee

A. Human Capital Strategy & Policy Sub-Committee (HSP)

The Human Capital Strategy & Policy Sub-Committee is responsible for setting the strategic direction for human capital management in alignment with BNI's overall strategy.

B. Executive Talent Sub-Committee (ETC)

The Executive Talent Sub-Committee (ETC) is responsible for managing the talent cycle for Division Heads, Regional Manager, Overseas Offices General Manager, and equivalent positions. This includes the appointment of management teams within subsidiaries, in accordance with applicable governance and authority structures.

Structure and Membership of the Human Capital Committee

The Human Capital Committee (KHC) comprises members of the Board of Directors, along with one level of Executive Officers below the Board of Directors, who are appointed to the committee. The membership structure of KHC is determined through a Board of Directors' Decree, which also establishes the appointment of the Chairperson, Vice Chairperson, and committee members.

Based on the Board of Directors' Decree No. KP/351/DIR/R dated August 15, 2024, regarding the Structuring of the Human Capital Committee (KHC), the composition, membership, and voting rights status of the Human Capital Committee as of December 31, 2024, are as follows:

A. Human Capital Strategy & Policy Sub-Committee (HSP)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Secretary	Human Capital Strategy Division Head (concurrently permanent member)	Holds no voting rights
Permanent Member at the Board of Directors level (voting member)	1. Deputy President Director 2. Human Capital & Compliance Director 3. Finance Director	Holds voting rights
Anggota tetap (non-voting member)	1. SEVP Human Capital 2. Human Capital Services Division Head 3. BNI University Head 4. Human Capital Business Partner Head	Holds no voting rights
Non Permanent Member (non-voting member)	Director/SEVP/Division Head/Unit/Functional Unit related to the topic of discussion	Holds no voting rights

B. Executive Talent Sub-Committee (ETC)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Secretary	Human Capital Strategy Division Head (concurrently a permanent member)	Holds no voting rights
Permanent Member at the Board of Directors level (voting member)	1. Deputy President Director 2. All Members of the Board of Directors	Holds voting rights
Permanent Member at the Division/Unit/ Functional Unit level (Non-voting member)	Human Capital Business Partner Head (as proposer)	Holds no voting rights
Non Permanent Member (non-voting member)	SEVP related to the discussion topic	Holds no voting rights

Term and Tenure of the Human Capital Committee

The tenure of the Human Capital Committee members follows the respective structural tenure periods within BNI.

Profile of the Chairperson and Members of the Human Capital Committee

Comprehensive information on the profiles of the Human Capital Committee (HC) members is detailed in the Company Profile Chapter, under the subchapters Board of Directors Profile, Senior Executive Vice President (SEVP) Profile, and Executive Officers Profile.

Certification of the Human Capital Committee

BNI ensures that all personnel within the Human Capital Committee (HC) meet the required qualification standards and competency certifications in accordance with applicable regulations. In 2024, the Human Capital Committee successfully participated in certification programs.

Independence Statement of the Human Capital Committee

The Human Capital Committee (HC) at BNI carries out its duties, responsibilities, and authority professionally and independently, free from any undue influence that contradicts prevailing laws and regulations. The committee's independence statement is formally documented in an *Integrity Pact*, which is periodically reviewed and signed by all committee personnel.

Meetings of the Human Capital Committee

Meeting Policy

The policies and procedures for holding Human Capital Committee meetings at BNI are as follows:

1. The Human Capital Committee (KHC) must convene at least twice a year or as needed at a predetermined location, date, and time to ensure all members can schedule their attendance.
2. If the Chairperson is unable to attend, a Substitute Chairperson may be appointed through a Replacement Director mechanism or via an official assignment letter.
3. The Committee may schedule ad hoc meetings if urgent issues require immediate resolution. It may also hold limited meetings with relevant Divisions/Departments/Functional Units to formulate operational policies in alignment with the established committee policies.
4. If deemed necessary, the Committee has the right to invite other Divisions/Departments/Functional Units outside the committee membership to attend meetings as resource persons for discussions on specific issues within their areas of expertise.
5. A quorum is met when more than half of the permanent members at the Board of Directors level are present, including the presence of the Committee Chairperson.

Frequency and Attendance Rate

A. Human Capital Strategy & Policy Sub-Committee (HSP)

In 2024, BNI held two meetings of the Human Capital Strategy & Policy Sub-Committee (HSP), attended by the Board of Directors and committee members. Detailed information on the Human Capital Committee meetings and the attendance rate of its members is presented in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	February 26, 2024	Determination of Employee Performance Assessment, Employee Classification and Annual Bonus	100%
2	October 14, 2024	Kickoff Human Capital Roadmap BNI	96%

B. Executive Talent Sub-Committee (ETC)

In 2024, BNI held 12 meetings of the Executive Talent Sub-Committee (ETC), attended by the Board of Directors and committee members. Detailed information on the Human Capital Committee meetings and the attendance rate of its members is presented in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 29, 2024	Promotion/Rotation Mutation of employees Division Head/Regional Manager/ Overseas Office General Manager/equivalent, including the determination of management in Subsidiary Companies	100%
2	February 19, 2024	Promotion/Rotation Mutation of employees Division Head/Regional Manager/ Overseas Office General Manager/equivalent, including the determination of management in Subsidiary Companies	100%
3	February 22, 2024	Determination of Nominated Talent BUMN Financial Services Cluster	100%

No.	Date	Meeting Agenda	Attendance Quorum (%)
4	March 5, 2024	Promotion/Rotation Mutation of employees Division Head/Regional Manager/ Overseas Office General Manager/equivalent, including the determination of management in Subsidiaries	100%
5	April 1, 2024	Promotion/Rotation Mutation of employees Division Head/Regional Manager/ Overseas Office General Manager/equivalent, including the determination of management in Subsidiaries	100%
6	May 20, 2024	Promotion/Rotation Mutation of employees Division Head/Regional Manager/ Overseas Office General Manager/equivalent, including the determination of management in Subsidiaries	100%
7	May 28, 2024	Promotion/Rotation Mutation Division Head/Regional Manager/Overseas Office General Manager/equivalent employees, including management appointments at Subsidiaries	95%
8	June 10, 2024	Promotion/Rotation Mutation Division Head/Regional Manager/Overseas Office General Manager/equivalent employees, including management appointments at Subsidiaries	86%
9	July 15, 2024	Evaluation of Acting Officers (PJ) & Grade Evaluation of Division Head/Regional Manager/Overseas Office General Manager/equivalent employees	91%
10	September 24, 2024	Promotion/Rotation Transfer of Division Head/Regional Manager/Overseas Office General Manager/equivalent employees, including management appointments at Subsidiary Companies	92%
11	October21, 2024	Promotion/Rotation Transfer of Division Head/Regional Manager/Overseas Office General Manager/equivalent employees, including management appointments at Subsidiary Companies	91%
12	December 2, 2024	• Promotion/Rotation Transfer of Division Head/Regional Manager/Overseas Office General Manager/equivalent employees, including management appointments at Subsidiary Companies • Evaluation of Acting Officers (PJ) & Grade Evaluation of Division Head/ Manager	95%

Training and/or Competency Development of the Human Capital Committee in 2024

In 2024, the Chair and members of the Human Capital Committee (KHC) participated in various training sessions, seminars, and workshops to maintain their expertise and competencies in support of their daily responsibilities. Detailed information regarding these activities is outlined in Chapter: Company Profile, under the sub-section Competency Development Policy, in the discussion titled Competency Development Based on Job Level and Gender Equality in 2024, as well as in Chapter: Corporate Governance, under the sub-section Board of Directors, in the discussion titled Training and/or Competency Development.

Implementation of Human Capital Committee Duties in 2024

Throughout 2024, the Human Capital Committee (KHC) has carried out its responsibilities, including:

1. Establishing Employee Performance Assessment, Employee Classification, and Annual Bonus policies.
2. Managing the promotion, rotation, and transfer of Division Heads, Regional Manager, Overseas Office General Manager, or equivalent positions, including the appointment of management in subsidiaries, in accordance with applicable governance and authority.
3. Conducting performance evaluations for Acting Officials (PJ) and Grade Evaluations for Division Heads, Regional Heads, Overseas Branch Heads, or equivalent positions, including the appointment of management in subsidiaries under the applicable governance framework.
4. Designating Nominated Talent for State-Owned Enterprises (SOEs) Financial Services Cluster.
5. Launching the Human Capital Roadmap 2025–2029.

Human Capital Committee Work Plan for 2025

The Human Capital Committee (KHC) has formulated its 2025 work plan, aligned with BNI's Human Capital Roadmap, which includes:

1. Establishing Employee Performance Assessment, Employee Classification, and Annual Bonus policies.
2. Managing the promotion, rotation, and transfer of Division Heads, Regional Heads, Overseas Branch Heads, or equivalent positions, including the appointment of management in subsidiaries, in accordance with applicable governance and authority.
3. Designating Nominated Talent for SOEs.

Subsidiaries Committee (KPA)

As one of BNI's permanent committees, the Subsidiaries Committee (KPA) holds the authority to establish and oversee policies and corporate actions related to BNI's subsidiaries. Its primary objective is to develop subsidiaries that are competitive and sustainable. The KPA plays a crucial role in ensuring that subsidiaries grow in alignment with BNI's vision by monitoring their performance, enforcing good corporate governance, and fostering synergy between the parent company and its subsidiaries to enhance competitiveness and long-term growth.

Subsidiaries Committee Charter

In fulfilling its functions and responsibilities, all members of the Subsidiaries Committee adhere to the Subsidiaries Committee Charter, which serves as a working guideline. This charter clearly defines the structure, authority, duties and responsibilities, meeting procedures, activities, and operational framework of the Subsidiaries Committee. The Subsidiaries Committee Charter was established by the Board of Directors through Decree No. KP/067/DIR/R dated March 7, 2022, and is periodically reviewed to ensure its alignment with applicable regulations and the Bank's evolving needs. The currently valid Subsidiaries Committee Charter remains relevant to current conditions.

Duties and Responsibilities of the Subsidiaries Committee

The duties and responsibilities of the Subsidiaries Committee include:

1. Defining strategies and targets for subsidiaries.
2. Establishing business initiatives for BNI's capital participation in subsidiaries.
3. Approving Corporate Actions and capital participation within BNI Incorporated.
4. Evaluating financial performance of subsidiaries.
5. Setting remuneration policies for subsidiary management.
6. Approving Subsidiaries' Annual Budget and Business Plan (RKAP).
7. Determining the execution and agenda of General Meetings of Shareholders (GMS) for subsidiaries.
8. Appointing Proxies to represent BNI as a Shareholder in subsidiaries.

Structure and Membership of the Subsidiaries Committee

The Subsidiaries Committee consists of members from the Board of Directors, along with designated executive officers at one level below the Board of Directors. The committee's membership structure is determined by a Board of Directors Decree, which also serves as the official appointment of the Chairperson, Vice Chairperson, and Committee Members.

Based on Board of Directors Decree No. KP/067/DIR/R dated March 7, 2022, concerning the structuring of the Subsidiaries Committee (KPA), and the subsequent revision of the committee's membership as outlined in Memo CDV No. CDV/2/786/R dated August 15, 2024, regarding the Updated Membership Structure of the Subsidiaries Committee (KPA), the structure, membership, and voting rights of the Subsidiaries Committee, as of December 31, 2024, are as follows:

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Subsidiaries Management Division Head	Holds no voting rights
Permanent Member at the Director & SEVP level (Voting member)	1. Finance Director 2. Risk Management Director 3. Director of Subsidiary Company Development related to the material to be discussed	Holds voting rights
Permanent Member at the Board of Directors level (Non-voting member)	Human Capital & Compliance Director*	Holds no voting rights
Non Permanent Member at the Board of Directors level (Non-voting member)	Board of Directors & SEVP related to the material present as invitees	Holds no voting rights

*) Specifically, Human Capital & Compliance Director has specific duties and responsibilities that are regulated in the committee's work guidelines.

Period and Term of Office of Subsidiary Committee

The term of office of the KPA Committee membership is determined following each structural term of office at BNI.

Profile of the Chairman and Members of the Subsidiary Committee

Information on the profile of the members of the Subsidiary Committee has been described in full in the Company Profile Chapter, Sub-chapter Profile of the Board of Directors, Sub-chapter Profile of the Senior Executive Vice President (SEVP) and Sub-chapter Executive Officers.

Subsidiary Committee Certification

BNI ensures that all personnel of the Subsidiary Committee have met the qualification standards and competency certification in accordance with applicable provisions. In 2024, the Subsidiary Committee has participated in the certification program.

Subsidiary Committee Independence Statement

BNI ensures that all members of the Subsidiary Committee always carry out their duties and responsibilities objectively and independently. The Subsidiary Committee Independence Statement has been disclosed in the Integrity Pact which is periodically updated and signed by all committee personnel.

Subsidiary Committee Meeting

Meeting Implementation Policy

The policy and procedures for implementing BNI Subsidiary Committee meetings are as follows:

1. The Committee holds meetings at least 4 (four) times in 1 (one) year or according to needs at a certain place, time and date that has been determined so that all members can arrange their attendance time.
2. The Committee can schedule a sudden meeting considering the importance of the problem that must be decided immediately. The decision of the Committee is then implemented through the Committee Secretary. In addition, the Committee can hold a limited meeting with the relevant Division/Unit and formulate operational policies that are in line with the established Committee policy.
3. If necessary, the Committee has the right to invite Divisions/Units/Functional Units outside the Committee members to attend the meeting according to their competence.
4. The quorum for the committee meeting is achieved if it is attended by at least more than 1/2 (half) of the permanent members at the Board of Directors level in which the Chairperson and/or Deputy Chairperson of the Committee are present.

Frequency and Attendance Level

In 2024, BNI held 3 (three) meetings of the Subsidiary Committee attended by the Board of Directors and committee members. More detailed information on the implementation of the KPA Committee Meeting and the level of attendance of committee members in the meeting is described in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)	Notes
1	June 10, 2024	Proposed Agenda for PA AGMS for Fiscal Year 2023	100	Approval of the Proposed Agenda for the AGMS of Subsidiary Company for the Financial Year 2023.
2	June 10, 2024	Proposal for Approval of Changes in the Term of Office of the Management of Subsidiary Companies	100	Approval of changes in the term of office of the management of BNI subsidiaries and ownership through subsidiary companies
3	June 10, 2024	2023 Judiciary Proposal and 2023 Tantiem & 2024 Remuneration of Subsidiary Companies	100	Consultation for the judiciary of the subsidiaries for the achievement of the year 2023.
4	August 12, 2024	Performance Review of Subsidiary Companies 1H-2024	100	Performance review of the subsidiaries› performance in 2024.
5	November 18, 2024	Subsidiary Companies Business Plan Proposal 2025	100	Consultation for the preparation of the Subsidiary Company Business Plan 2025.
6	November 18, 2024	Approval of Recovery Plan & Consultation on Resolution Plan hibank 2025	100	Approval of hibank's recovery plan and resolution plan consultation.

Training and/or Competency Improvement of FTC Committee in 2024

In 2024, the chairman and members of the FTC Committee have participated in a number of training activities/seminars/workshops in order to maintain their level of expertise and competence to support the implementation of their daily duties. Information related to this matter has been described in the Company Profile Chapter, Competency Development Policy Subchapter in the discussion entitled Competency Development Based on Position Level and Gender Equality in 2024, as well as in the Corporate Governance Chapter, Board of Directors Subchapter, in the discussion entitled Training and/or Competency Improvement.

Implementation of Duties of the Committee on Subsidiary Companies in 2024

Throughout 2024, the Committee on Subsidiary Companies has carried out its duties in accordance with its established responsibilities.

Work Plan of the Committee on Subsidiary Companies in 2025

The Subsidiary Companies Committee has established a work plan for 2025 as follows:

1. Proposed Agenda of Annual General Meeting of Shareholders (AGMS) of Subsidiary Companies for Financial Year 2024
2. Judiciary of Subsidiary Companies for the achievement of 2024
3. Performance Review of Subsidiary Companies
4. Consultation on Business Plan of Subsidiary Company for 2026
5. Strategic plan for the development of Subsidiary Companies

Supporting Organ of the Board of Directors

The Board of Directors has supporting organs that assist it with its executive and management duties and responsibilities of the Bank, including the Corporate Secretary, Investor Relations, Internal Audit Unit, Compliance Division and Enterprise Risk Management Division.

Corporate Secretary [ACGS D.3.7]

BNI has a corporate secretary whose duties include performing the Bank's secretarial functions, maintaining the Bank's image, and protecting its interests by building effective communication and establishing good relationships with stakeholders. The Corporate Secretary also acts as a liaison officer between the Bank and external parties such as capital market regulators, shareholders, the media, and other stakeholders. In carrying out its roles and functions, the Corporate Secretary must ensure the Bank's compliance with developments in capital market r, banking, and other relevant regulations related to the Bank's business activities. Additionally, the Corporate Secretary is responsible for providing important and up-to-date information that the Board of Directors and the Board of Commissioners may need from time to time as a basis for decision-making. [ACGS D.3.7]

BNI ensures that the Corporate Secretary has the qualifications and competencies to carry out their duties and responsibilities, as well as a commitment to continuous learning and improvement to enhance their expertise. The Corporate Secretary is trained in legal, accounting, or corporate secretarial practices and stays abreast with relevant developments. [ACGS D.3.8]

Legal Basis

The regulations and legislation that serve as the basis for the establishment, appointment, and implementation of the Corporate Secretary at BNI are as follows:

1. Law No. 19 of 2003 concerning State-Owned Enterprises as stipulated in Law No. 6 of 2023 concerning Stipulation of Government Regulations in Lieu of Law No. 2 of 2022 concerning Job Creation becomes law;
2. Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 dated March 3, 2023, regarding Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
3. Financial Services Authority Regulation No. 35/POJK.04/2014 regarding the Corporate Secretary of Issuers or Public Companies ("POJK 35/2014");
4. BNI's Articles of Association.

Organizational Structure of The Corporate Secretary

According to the Decree of the Board of Directors No. KP/136/DIR/R dated April 12, 2023, and the Memo of the Corporate Development & Transformation Division No. CDV/2/364/R dated April 27, 2023, the organizational structure, functions, and roles of the Corporate Secretary at BNI are currently carried out by the Head of the Corporate Secretary Division, overseeing the following departments: Corporate Communication Department, Corporate Media Intelligence & Analytics Department, Corporate Event & Sponsorship Department, Corporate Social Responsibility Department, Corporate Stakeholder Management Department, Capital Market Assurance & Board Governance Department, and the Office of the Board Department.

Position of Corporate Secretary in BNI Organizational Structure



As outlined in the Bank's Articles of Association, the Corporate Secretary of BNI reports to the President Director. Their appointment and dismissal procedure is based on a decision by the Board of Directors with the knowledge and approval of the Board of Commissioners. Their role is vital in supporting the execution of the duties and responsibilities of the Board of Directors and the Board of Commissioners. [ACGS D.3.7]

Duties and Responsibilities of the Corporate Secretary [ACGS D.3.7]

In accordance with the provisions of POJK 35/2014, the Corporate Secretary of BNI bears the following duties and responsibilities:

1. To monitor developments in the Capital Market, particularly the applicable laws and regulations in the Capital Market sector;
2. To advise the Board of Directors and the Board of Commissioners on compliance with applicable laws and regulations in the Capital Market;
3. To assist the Board of Directors and the Board of Commissioners in implementing corporate governance, including:
   a. Transparency of information to the public, including the availability of information on the BNI website;
   b. Timely submission of reports to the Financial Services Authority (OJK);
   c. Organizing and documenting the General Meeting of Shareholders (GMS);
   d. Organizing and documenting meetings of the Board of Directors and/or the Board of Commissioners;
   e. Implementing the company's orientation program for the Board of Directors and/or the Board of Commissioners.
4. To act as a liaison between BNI and its shareholders, the Financial Services Authority, and other stakeholders.
5. To provide information needed by shareholders and stakeholders related to the condition of BNI.
6. To attend Board of Directors meetings, Board of Commissioners meetings, joint meetings of the Board of Directors and Board of Commissioners, and to prepare meeting minutes.
7. To manage the Shareholders Register and Special Shareholders Register.
8. To be responsible for organizing the GMS. To prepare necessary materials related to the reports/routine activities of the Board of Directors to be presented to external parties and to prepare materials for matters requiring the Board of Directors' decisions concerning BNI's management;
9. To organize meetings within the Board of Directors, both routine and non-routine.
10. To conduct activities related to shareholders and stakeholders through analyst meetings, public expos, conference calls, non-deal roadshows, and meetings with shareholders.

In line with POJK 35/2014 and to achieve the vision and mission of the Corporate Secretary, which aligns with BNI's vision and mission, the Corporate Secretary body of BNI has functions and duties outlined in the Company's Guidelines for the Corporate Secretary Division, including the following:

1. **Capital Market Assurance and Board Governance Function**
   To carry out activities related to the Corporate Secretary's role concerning applicable regulations in the capital market, corporate law for BNI, and contract law within the scope of the Corporate Secretary Division. The Corporate Secretary also monitors the implementation of BNI's Good Corporate Governance (GCG) practices (GMS, Board of Directors, and Board of Commissioners)

to ensure compliance with regulations and best practices.

2. **Corporate Communication Function**
   To carry out internal and external communication activities, research and development of internal communication tools, publication of internal media, communication media for the Board of Directors, internal communication media in print and electronic forms (BNI website and internal communication portal), and manage media relations.

3. **Corporate Media Intelligence and Analytics Function**
   To carry out corporate media intelligence and analytics activities and manage systems and tools related to follow-up on negative media coverage of BNI Group.

4. **Corporate Event and Sponsorship Function**
   To manage BNI's sponsorship activities comprehensively, including corporate identity, BNI branding, as well as promotional activities, and corporate events.

5. **Corporate Social Responsibility Function**
   To develop strategies for optimizing the implementation, monitoring, evaluation, and realization of the Social and Environmental Responsibility Program (TJSL) and community development.

6. **Corporate Stakeholder Management Function**
   To carry out activities related to institutions and collaborate with relevant agencies to enhance BNI's Corporate Image. The Corporate Secretary also manages activities related to the media, establishing cooperation with mass media and institutions to improve BNI's Corporate Image.

7. **Office of the Board Function**
   To carry out activities related to the smooth execution of the duties of the Board of Commissioners in ensuring the implementation of GCG, supporting the needs of the Board of Directors, and managing secretarial activities, protocol, housekeeping, and general affairs activities.

Corporate Secretary Profile



Okki Rushartomo
Corporate Secretary

Age
44 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Bachelor degree in Industrial Engineering from Institut Teknologi Bandung (2002)

Legal Basis for Appointment
Appointed as Corporate Secretary based on the Decree of the Board of Directors No. KP/367/DIR/R dated September 14, 2022, and reconfirmed based on the Decree of the Board of Directors No. KP/208/DIR/R dated May 31, 2023.

Term of Office
September 19, 2022 – Present

Professional Certification and/or Training [ACGS D.3.8]
Risk Management Competency Level 6 by the Banking Professional Certification Institute (2024)

Work Experience [ACGS D.3.8]
BNI
- Assistant Vice President in the Card Business Division at PT Bank Negara Indonesia (Persero) Tbk (2012-2015)
- Vice President of the Card Business Division at PT Bank Negara Indonesia (Persero) Tbk (2015-2018)
- Head of the Card Business Division at PT Bank Negara Indonesia (Persero) Tbk (2018-2020)
- Head of the Marketing Communications Division at PT Bank Negara Indonesia (Persero) Tbk (2020-2022)

Other Companies
- Assistant Vice President at PT Bank HSBC Indonesia (2010-2012)

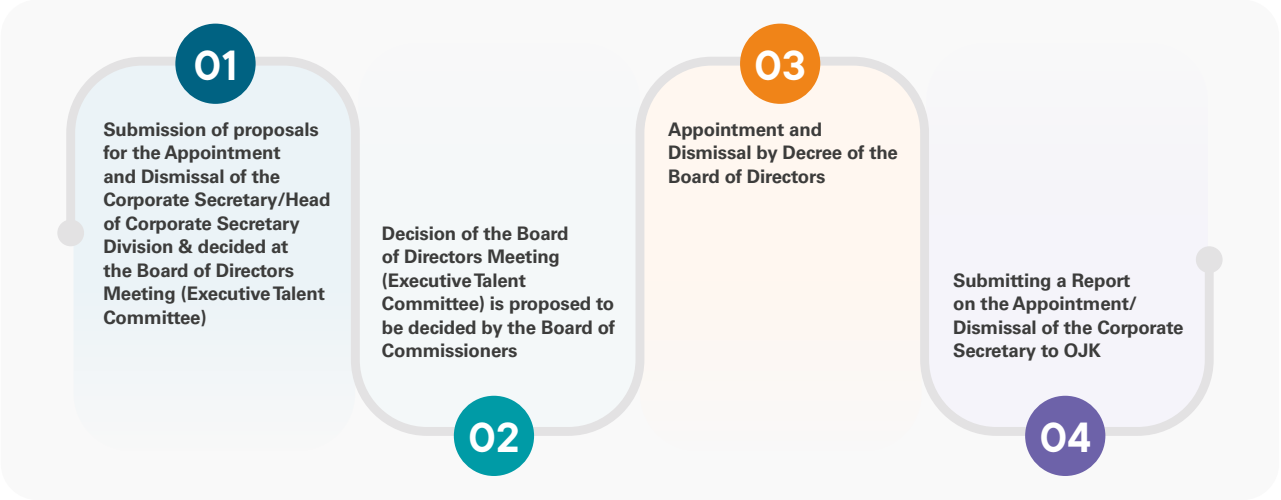
Concurrent Positions
Does not hold concurrent positions either internally or externally at BNI.

Affiliated Relationships
Does not have any affiliated relationships with members of the Board of Directors, Board of Commissioners, or Major/Controlling Shareholders.

Tenure of the Corporate Secretary

Mr. Okki Rushartomo effectively assumed the position of Corporate Secretary of BNI based on the Board of Directors Decree No. KP/367/DIR/R dated September 14, 2022, and was reappointed through the Board of Directors Decree No. KP/208/DIR/R dated May 31, 2023. He resides in Jakarta, Indonesia, and continues to serve as the Corporate Secretary of BNI to this day.

Process for Appointment and Dismissal of Corporate Secretary



On September 19, 2022, BNI submitted a report on the appointment of Okki Rushartomo as the Corporate Secretary to the OJK (Financial Services Authority), the Indonesia Stock Exchange, and the Ministry of State-Owned Enterprises.

Training and/or Competency Development for the Corporate Secretary in 2024 [ACGS D.3.8]

In order to enhance knowledge and competency development to support the execution of his duties, the Corporate Secretary participated in several training programs, seminars, and workshops, both online and offline, throughout 2024, including the following:

Title of Training/Workshop/ Conference/Seminar	Date of Implementation	Venue	Type of Activity	Organizer
High Level Meeting (HLM) for ACGS Assessment in 2024	January 19, 2024	Indonesia Stock Exchange Building, Jakarta	Focus Group Discussion	Financial Services Authority
One on One Meeting ACGS 2024	January 23, 2024	Indonesia Stock Exchange Building, Jakarta	Workshop	Indonesia Stock Exchange
Discussion of POJK 17 Concerning Implementation of Governance for Commercial Banks	January 23, 2024	Zoom	Webinar	Ministry of State-Owned Enterprises
Discussion of Follow-up to POJK 17/2023	January 30, 2024	Zoom	Webinar	Himbara
Discussion of Proposed Amendments to the Articles of Association of HIMBARA Member Banks with the Ministry of SOEs of the Republic of Indonesia	February 6, 2024	Park Hyatt, Jakarta	Forum Group Discussion	Himbara
FGD related to Profile and Financial Performance of PT Bank Negara Indonesia (Persero) Tbk	March 1, 2024	Ms Teams	Focus Group Discussion	Ministry of Finance
Discussion of Gratification Governance (Sponsorship)	March 20, 2024	Zoom	Focus Group Discussion	KPK
Socialization of Regulation Number I-I of the Indonesia Stock Exchange	April 26, 2024	Zoom	Webinar	Indonesia Stock Exchange
Socialization of ETAK Governance Pillars and Annual Report Award 2023	May 6, 2024	Zoom	Webinar	KNKG Indonesia
JK6 Risk Management Certification Provision	July 6-26, 2024	Jakarta	Certification	Banking Professional Certification Institute

Title of Training/Workshop/ Conference/Seminar	Date of Implementation	Venue	Type of Activity	Organizer
Executive Sharing Session-Explore The New Experience of Leadership	July 25, 2024	Jakarta	Focus Group Discussion	BNI
Compliance Forum 2024: Creating an Anti-Corruption Culture	August 14, 2024	Jakarta	Focus Group Discussion	BNI-KPK
Socialization of Implementation of PDP Law No.27/2022	Agustus 26, 2024	Zoom	Webinar	BNI
FGD on Common Perception of Licensing of Management and Ownership of Commercial Banks	October 8, 2024	Zoom	Focus Group Discussion	Financial Services Authority
The Role of Legal & Corporate Secretary in SOE Governance	October 17-18, 2024	Intercontinental, Bali	Workshop	Himbara
Corporate Secretary Professional Standards	November 13-14, 2024	Jakarta	Workshop	Indonesia Corporate Secretary Association
Socialization and Working Group on Implementation of SIPELAKU	November 20, 2024	Jakarta	Workshop	Financial Services Authority
FGD Roadmap Pasar Modal Berkelanjutan	December 5, 2024	Jakarta	FGD	Financial Services Authority
Corporate Governance Leadership Program	December 5-6, 2024	Bali	Training	IICD

Report on the Implementation of Corporate Secretary Duties in 2024

In 2024, the Corporate Secretary prepared the Corporate Secretary Report as mandated in Article 11 of OJK Regulation No. 35/POJK.04/2014, which stipulates that:

1. The Corporate Secretary shall prepare a report periodically, at least once a year, on the implementation of the Corporate Secretary's functions to the Board of Directors, with a copy provided to the Board of Commissioners.
2. Issuers or Public Companies shall disclose a brief description of the Corporate Secretary's functions and information regarding the education and/or training attended by the Corporate Secretary in the issuer's or public company's annual report.

Below is the 2024 Corporate Secretary Report for BNI, which has been submitted to the Board of Directors:

No.	Function According to OJK	Program	Realization
1.	Keeping Abreast with the Developments in the Capital Market	Regarding developments in the Capital Market, especially Capital Market laws and regulations	• Providing responses to the Financial Services Authority as the capital market regulator regarding the draft OJK Regulations for 2024. • Participating in training in order to understand developments in the capital market, especially laws and regulations applicable in the capital market sector • Attending socialization and discussions on the implementation of Capital Market provisions and systems
2.	Providing input to the Board of Directors and Board of Commissioners to comply with Capital Market provisions	Providing input to the Board of Directors and Board of Commissioners to comply with Capital Market provisions in every decision-making or policy-making	• Reviewing and providing proposals regarding decisions and/or policies of the Board of Directors and Board of Commissioners and units under the Board of Directors, based on Capital Market provisions • Disseminating changes to Capital Market provisions to the Board of Directors and Board of Commissioners Re-submitting (reminder) Capital Market regulations to the Board of Directors and Board of Commissioners • Assisting the Board of Directors in organizing GMS by taking into account Capital Market regulations and best practices. The Annual GMS held on March 4, 2024 was carried out in accordance with applicable provisions, including voting, attended by members of the Board of Directors and Board of Commissioners, publication of minutes of the GMS available on the Company's website • Assisting the Board of Directors in improving the quality of corporate communication with Shareholders or Investors

No.	Function According to OJK	Program	Realization
		Assisting the Board of Directors and Board of Commissioners in implementing BNI Governance, including guaranteeing the rights of shareholders, the functions and roles of the Board of Commissioners, the functions and roles of the Board of Directors, stakeholder participation, information disclosure	• Assisting the Board of Directors in formulating corporate communication policies with shareholders or investors • Assisting the Board of Directors and Board of Commissioners in improving the competence of members of the Board of Directors and Board of Commissioners through training • Assisting the Board of Directors in preventing insider trading by compiling the Insider Trading Company Guidelines • Assisting the Board of Directors and Board of Commissioners in implementing long-term incentives to the Board of Directors and Employees by coordinating with the Human Capital Strategy Division and the Human Capital Services Division • Improving the implementation of information disclosure, namely in addition to the website, the Company uses other media, namely Twitter, Facebook, Instagram, LinkedIn, and YouTube.
3.	Assisting the Board of Directors and Board of Commissioners in the Implementation of BNI Governance	Implementation of orientation programs for the Board of Directors and/or Board of Commissioners of BNI Others related to the implementation of GCG	The Company submits periodic and incidental reports to regulators through reporting delivery media as regulated by each regulator
4.	Liaison between Issuers and Shareholders of Issuers or Public Companies, Financial Services Authority, and Other Stakeholders	Implementing strategies to improve the quality of BNI's communication with all stakeholders	• Assisting the Board of Directors in organizing Board of Directors Meetings, Board of Commissioners Meetings, and Board of Directors Meetings with the Board of Commissioners periodically in accordance with applicable provisions. • All Minutes of Board of Directors Meetings, Board of Commissioners Meetings and Board of Directors Meetings with the Board of Commissioners have been well documented, in hardcopy and softcopy
		Implementing strategies to improve the quality of BNI's communication with all stakeholders	Implementing an Orientation Program for the Board of Directors and/or Board of Commissioners with discussions related to: • Vision, mission, organizational structure of the Company, business activities, and operational networks • Annual Report, Company Work Plan and Budget (RKAP) and Bank Business Plan (RBB), Company Code of Ethics, BNI Work Culture, Board of Commissioners Work Procedures Guidelines, Good Corporate Governance Policy, and Company Articles of Association • Good Corporate Governance (concurrent positions, share ownership and independent commissioners); • Duties, authorities and responsibilities of the Board of Commissioners and Board of Directors, delegation of authority and limitations of authority of the Board of Commissioners in carrying out supervisory duties towards the company based on applicable laws and regulations • Committees under the Board of Directors and Board of Commissioners that are formed and directly responsible to the Board of Commissioners, the Secretary of the Board of Commissioners and the Secretariat of the Board of Commissioners that assist in the smooth running of the Board of Commissioners' duties • Remuneration and facilities provided to members of the Board of Directors and Board of Commissioners Together with the Compliance Division, prepare a Self-Assessment Report on the Implementation of GCG in the Company • GCG Commitment/Integrity Pact of the Board of Directors and Board of Commissioners • GCG Socialization • Stock Management • Disclosure of Share Ownership by the Company's Board of Directors and Board of Commissioners • Remuneration of the Board of Directors and Board of Commissioners • Rewards and GCG Assessments from External Parties related to the Corporate Secretary Function

Furthermore, the Corporate Secretary also ensures public transparency by disseminating information through the mass media, the IDX website, and BNI's official website in both Indonesian and English. A more detailed disclosure of this report is outlined in the Sub-Chapter on Transparency of Report Delivery.

Throughout 2024, the Corporate Secretary has submitted reports to the IDX and OJK in a timely manner. Broadly speaking, these reports can be categorized into Periodic Reports and Incidental Reports.

Periodic Reports

The Periodic Reports submitted by BNI's Corporate Secretary to the IDX and/or OJK in 2024 are detailed as follows:

No.	Report Type	Addressed to	Report Period	Number of Reports
1.	Monthly Report of Securities Holder Registration	FSA and IDX	Monthly	12
2.	Consolidated Financial Statements of Bank and Subsidiaries (Unaudited)	FSA and IDX	Quarter	4
3.	Annual Financial Statements (Audited)	FSA and IDX	Annual	1
4.	Annual Report (including Bank Governance Report and Integrated Governance Report of BNI Financial Conglomerate)	FSA and IDX	Annual	1
5.	Sustainability Report	FSA and IDX	Annual	1
6.	Annual Rating Result Report	FSA and IDX	Annual	1
7.	Annual Report of Parent Entity and Subsidiaries (Report of LJK which is part of BNI Financial Conglomerate)	FSA	Annual	1
8.	Report of Detailed List of Related Parties	FSA	Semiannual	2
9.	Report of Results of Annual Public Expose Implementation	IDX	Annual	1
10.	Report of List of 10 Largest Shareholders	FSA and IDX	Quarter	4
11.	Company Performance Report (Earning Call)	FSA and IDX	Quarter	4
12.	Announcement Report of Annual General Meeting of Shareholders	FSA and IDX	Annual	1
13.	Invitation Report of Annual General Meeting of Shareholders	FSA and IDX	Annual	1
14.	Report of Implementation of Annual General Meeting of Shareholders	FSA and IDX	Annual	1
15.	Report on the Implementation of Cash Dividend Payment	FSA and IDX	Annual	1

Incidental Reports

In addition to regular reports submitted periodically, BNI complies with regulations regarding information disclosure by submitting incidental reports to regulators (OJK and/or IDX). In 2024, the Corporate Secretary submitted a total of 33 (thirty three) incidental reports to regulators. Details of these reports are elaborated in the Subsection on Report Transparency.

Information on both Regular Reports and Incidental Reports has also been published on BNI's official website at https://www.bni.co.id/id-id/investor/berita-investor/keterbukaan-informasi.

Investor Relations

To maximize the Bank's market capitalization, BNI has established an Investor Relations Division, which is fully responsible for carrying out the Bank's Investor Relations functions. This unit plays a crucial role in building and managing good relationships with shareholders, the capital market community, and other financial communities. All activities carried out by the Investor Relations Division essentially form part of the Bank's corporate public relations activities.

Functions and Main Duties of Investor Relations

The investor relations function at BNI has been effectively operational since BNI became a publicly listed company through an Initial Public Offering (IPO) in 1996. In accordance with regulations requiring public companies to be transparent with shareholders and promote investment growth in the capital market, the Investor Relations function is essential.

BNI has had this function since becoming a public company, originally under the Corporate Secretary Division. However, in 2021, the company underwent an organizational restructuring that separated the Investor Relations function from the Corporate Secretary function. As a result, under the Board of Directors' Decree No. KP/289/DIR/R dated June 28, 2021, BNI established a distinct organization to manage the Investor Relations function. This initiative was undertaken considering the growing

importance of Investor Relations in managing communications between management and shareholders, alongside increasing shareholder interest in BNI.

In line with the provisions set by BNI, the Investor Relations Division has the following main functions:
1. Manage cooperation with relevant parties in Indonesia's capital market, including fund managers, analysts, stockbrokers, investment bankers, rating agencies, and members of the Indonesian Issuers Association (AEI);
2. Communicate the company's performance and strategy to market analysts and investors to achieve an optimal long-term stock valuation for BNI through analyst meetings, conference calls, roadshows, and related events;
3. Represent BNI's management in meetings with analysts and investors, either one-on-one or through public presentations, to communicate opinions, stances, and reactions to company challenges and/or opportunities and to present strategic follow-up actions for BNI's management;
4. Manage activities related to BNI's performance and ratings;
5. Monitor and analyze developments in BNI's stock performance, the exchange, and peer groups;
6. Manage BNI's performance database, stock information, investor contacts, reports, mailing lists for fund managers, and other relevant parties.
7. Ensure openness, accuracy, and timely disclosure of information to market participants.

Profile of Investor Relations Division Head



Yohan Setio, CFA
Investor Relations Division Head

Age
39 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's degree of Economics in Accounting from Universitas Indonesia (2003-2006)
- Masters degree in Business Administration from University of Cambridge (2011-2012)

Legal Basis for Appointment
Appointed as Head of Investor Relations Division based on Board of Directors Decree No. KP/258/DIR/R dated June 14, 2021, and the unit name was changed to Investor Relations Division Head based on Board of Directors Decree No. KP/229/DIR/R dated June 6, 2023.

Term of Office
2021 – Present

Professional Certification and/or Training
- Banking Risk Management Certification Qualification 5 with Certificate No./BSMR/SKT/7223/X/2024 dated October 7, 2024
- CFA (Chartered Financial Analyst) Certification from CFA Institute (2012)

Work Experience
At BNI
- Head of Investor Relations Division (2021 – Present)
- Acting Head of the Office of Chief Economist Division (2021-2022)

At Other Companies
- Senior Vice President - Head of Investor Relations at PT Bank Mandiri (Persero) Tbk (2016 – 2020)
- Associate Director - Institutional Equity Sales at PT Mandiri Sekuritas (2012 – 2016)
- Assistant Vice President – Equity Research Analyst at PT Mandiri Sekuritas (2008 – 2011)
- Officer – Global Transaction Banking at Deutsche Bank (2006 – 2008)

Concurrent Positions
None

Affiliated Relationships
Does not have any affiliated relationships with members of the Board of Directors, Board of Commissioners, or Major/Controlling Shareholders

2024 Investor Relations Division Activity Report

Throughout 2024, the Investor Relations Division effectively and efficiently performed its core functions, particularly in delivering accurate and timely information regarding the company's performance, business prospects, and other pertinent details required by investors, potential investors, analysts, the financial community, and the capital markets to support informed decision-making. Investor relations activities have been conducted in adherence to confidentiality principles and with equal treatment for all investors. Internally, the Investor Relations Division has also worked to enhance communication with various divisions

to strengthen alignment between BNI's strategies and the concerns of investors, thus improving the overall performance of the bank.

In line with its primary functions, the Investor Relations Division has also intensified monitoring of BNI's stock performance and the prevailing market sentiment, while optimizing the corporate rating review activities to ensure that BNI's rating remains within the investment-grade category. The division has been actively involved in enhancing the frequency and quality of information regarding the implementation of ESG (Environmental, Social, and Governance) aspects to investors, as well as participating in the ESG Rating Review and conveying emerging ESG-related issues in the market to the relevant divisions.

Throughout 2024, BNI has conducted analyst meetings and public expos to present its annual performance results. BNI has also actively participated in various conferences, both online and offline, as well as non-deal roadshows organized by securities firms or brokers, to improve the quality of its investor base by increasing the number of top-tier global institutional investors with a long-term investment horizon. These activities have facilitated interactions between BNI and domestic as well as international investors or potential investors. In 2024, the frequency of activities organized by the Investor Relations Division, including conferences and non-deal roadshows (NDR), increased compared to 2023. This aligns with the initiative to improve the investor base by targeting regions in the Americas and Europe, which were previously underutilized.

In addition to institutional investors, BNI has consistently maintained strong relationships with retail investors. To enhance communication with retail investors, the Investor Relations Division has utilized social media platforms to provide updates to retail investors, collaborating with brokers that have a large retail investor base.

The aforementioned initiatives are driven by the growing enthusiasm of retail investors, which has steadily increased since the pandemic. This is also reflected in the increased number of activities carried out by the Investor Relations Division in 2024 compared to 2023. The following table provides a detailed breakdown of BNI's Investor Relations activities over the past two years:

BNI Investor Relations Activity Statistics for 2024 and 2023

Investor Relations Activity	2024	2023
Analyst Meetings [ACGS C.7.3]	4	4
Public Exposes (Including Public Expose from IDX)	5	5
Non-Deal Roadshow & Conference Calls	21	12
Retail Investor Webinar/Seminar	7	3
Regular Meeting with Investors	353	365
Annual Rating Review Meetings	3	3
Total	**393**	**392**

Activities Involving Existing Shareholders [ACGS A.4.1]

Throughout 2024, the Investor Relations Division also conducted activities involving all shareholders including institutional shareholders. During this period, BNI has invited investors and participated in the following activities:

Activity	Date of Implementation	Place of Implementation	Event Description	Event Mechanism
Nomura ASEAN Conference	January 15, 2024	Kuala Lumpur	Investor conference held by Nomura	Offline
Earnings Call FY2023	January 26, 2024	Jakarta	FY2023 performance presentation	Online
Jefferies 5th Asia Forum	March 19-21, 2024	Hong Kong	Investor conference held by Jefferies	Offline
Earnings Call 1Q2024	April 19, 2024	Jakarta	1Q2024 performance presentation	Hybrid
Non-Deal Roadshow	May 6-21, 2024	London, Edinburgh, Denmark, Germany, Switzerland, Italy, France	Non-Deal Roadshow organized with Macquarie	Offline

Activity	Date of Implementation	Place of Implementation	Event Description	Event Mechanism
Asia Conference 2024	June 12-13, 2024	Hong Kong	Investor conference held by Bank of America (BoFA)	Offline
Investor Branch Visit	June 20, 2024	Bali	Institutional investor visit to BNI's Bali Nusra regional office	Offline
Non-Deal Roadshow	June 25-28, 2024	Kuala Lumpur and Singapore	Non-Deal Roadshow held with BNI Sekuritas	Offline
Earnings Call 1H2024	August 22, 2024	Jakarta	1H2024 performance presentation	Online
ASEAN Conference 2024	August 27-28, 2024	Singapore	Investor conference held by Macquarie	Offline
31st CITIC CLSA Investors' Forum	September 11-12, 2024	Hong Kong	Investor conference held by MacquarieInvestor conference held by CLSA	Offline
Retail Webinar with Mirae Aset Sekuritas	September 19, 2024	Jakarta	Update okay to retail investors	YouTube Channel
Market Update with BNI Emerald Clients & Investor	October 3, 2024	Jakarta	Inviting BNI Emerald Clients & Investors	Offline
Earnings Call 3Q2024	October 25, 2024	Jakarta	3Q2024 performance presentation held virtually	Offline
Investor Branch Visit	November 6, 2024	Jakarta	Institutional investor visit to BNI's Jakarta Senayan office	Offline
23rd Annual Pacific Summit	November 20-21, 2024	Singapore	Investor conference held by Morgan Stanley	Offline
Macquarie Asia Conference	December 10-11, 2024	New York	Investor conference held by Macquarie	Offline
Non-Deal Roadshow	December 12-18, 2024	USA and Canada	Non-Deal Roadshow organized with BNI Sekuritas	Offline

All of the above activities were attended by BNI's existing shareholders.

Incidental Reports

In addition to regular reports submitted periodically, BNI complies with regulations regarding information disclosure by submitting incidental reports to regulators (OJK and/or IDX). In 2024, the Corporate Secretary submitted a total of 61 (sixty one) incidental reports to regulators. Details of these reports are elaborated in the Subsection on Report Transparency.

Information on both Regular Reports and Incidental Reports has also been published on BNI's official website at https://www.bni.co.id/id-id/investor.

Investor Relations Contacts [ACGS C.10.1]

BNI Investor Relations can be contacted via:
Investor Relations
Phone : +621-8665-6800.
Address : Menara Astra, Jl. Jenderal Sudirman Kav 5-6 Jakarta.

Internal Audit Unit [ACGS: D.3.14]

To ensure the implementation of sound banking operations supported by a robust control environment, BNI has established the Internal Audit Division (IAD) as a strategic support organ under the Board of Directors. This division serves as a strategic partner to management, fulfilling the role of a Risk Assurance Unit (Third Line Roles) within the third line of defense in the Internal Control System framework. In executing its role as the third line, the Internal Audit Division routinely engages in coordination and communication with other work units, fostering collaboration and mutual contributions to create and preserve values aligned with the interests of stakeholders.

The implementation of BNI's Internal Audit function encompasses assurance and consulting activities that are independent and objective in nature. These activities aim to enhance the Bank's value and improve its operations through a systematic approach by evaluating and improving the effectiveness of risk management, control mechanisms, and governance processes. To enhance the quality of the Bank's internal controls, Internal Audit conducts a series of regular activities, including assessing the adequacy and effectiveness of risk management frameworks, internal control processes, and governance, as well as evaluating performance quality and providing advisory services.

In carrying out monitoring activities, the Internal Audit Division (IAD) applies a risk-based audit (RBA) approach grounded in the results of risk assessment analysis. Consulting functions are performed both formally and informally, involving independent reviews of new product or activity launches (in accordance with OJK regulations) and special assignments either at management's request or on IAD's initiative. By prioritizing risk as the foundation for audit planning and execution, the RBA approach offers a more efficient method of resource allocation and facilitates the identification of issues that could impact the achievement of organizational objectives.

In response to the rapid advancements in information technology, which significantly influence organizational work environments, the Internal Audit Division (IAD) continuously innovates both its methodologies and the use of audit tools to enhance the effectiveness of audits across the Three Lines Model, thereby ensuring greater strength and maturity. To guarantee that audits are conducted systematically, effectively, and efficiently, while avoiding conflicts of interest, Internal Audit utilizes a computerized Audit Management System (AMS). This system serves as the optimal method for collecting audit evidence and evaluating whether audit criteria have been properly implemented in line with audit objectives. Additionally, it promotes the improvement of the Bank's internal control quality and effectiveness while ensuring the achievement of performance excellence.

Legal Basis and Guidelines for Internal Audit Implementation

All Internal Audit activities within BNI adhere to the following regulations:

1) POJK No. 1/POJK.03/2019 dated January 28, 2019, concerning the Implementation of Internal Audit Functions in Commercial Banks.
2) POJK No. 11/POJK.03/2022, regarding the Organization of Information Technology by Commercial Banks.
3) SEOJK No. 21/SEOJK.03/2017, concerning the Application of Risk Management in the Use of Information Technology by Commercial Banks.
4) POJK No. 45/POJK.03/2020 dated October 16, 2020, on Financial Conglomerates.
5) International Professional Practices Framework (IPPF).

Internal Audit Charter

BNI has established its Internal Audit Charter, formally ratified and jointly signed by the President Director and the Board of Commissioners through Board of Directors Decree No. KP/351/DIR/R dated August 15, 2024. The formulation of BNI's Internal Audit Charter aligns with the provisions of OJK Regulation No. 1/POJK.03/2019 and applicable professional auditing standards. The Charter is reviewed and updated periodically to address the Bank's evolving requirements and regulatory developments, with the most recent revision finalized on August 9, 2024, and duly approved by the President Director and the Board of Commissioners.

The BNI Internal Audit Charter serves as a formal written guideline that provides a reference framework for the Internal Audit Division (IAD) to perform its functions effectively and efficiently. The Charter encompasses key provisions, including: Vision and Mission, Structure and Position Duties and Responsibilities, Authority, Code of Ethics, Independence and Objectivity, Objectives and Scope of Audit Activities, Auditor Requirements and Development, Audit Risks and Legal Protections for Leaders and Auditors, Audit Quality Control Program, Internal Audit's Role in Integrated Governance, Relationships Between Internal and External Auditors.

Duties and Responsibilities of The Internal Audit Unit

As stipulated in the BNI Internal Audit Charter, the scope of the Internal Audit assignment is as follows:

1. Assisting the President Director and the Board of Commissioners in conducting supervision by describing the planning, implementation and monitoring of audit results in operational terms;
2. Examining and assessing the efficiency and effectiveness of finance, accounting, operations, human resources, marketing, information technology and other activities through audits;
3. Identifying all possibilities to improve and increase the efficiency of the use of resources and funds used;
4. Providing recommendations for improvements and objective information on the examination results in the form of an Audit Report and submit the report to the President Director and the Board of Commissioners with copies to the Audit Committee and the Director in charge of the Compliance function;
5. Providing consulting services to BNI internally to add value and improve the quality of control, risk management, and corporate governance as long as it does not affect the independence and objectivity of the IAU, and adequate resources are available;
6. Carrying out follow-up monitoring of audit results as well as periodically submit a Pending Follow-up Report on Audit Results to the President Director and the Board of Commissioners with copies to the Audit Committee, as well as the Director in charge of the Compliance function; and
7. Conducting an in-depth audit at the request of the Board of Directors and/or Commissioners, or as a follow-up to the general audit results of an object or event that is suspected to contain indications of violation and/or fraud if necessary.
8. Internal Audit works closely with work units that perform other internal control functions.

Duties and Responsibilities of The Head of Internal Audit Unit

As stipulated in the BNI Internal Audit Charter, the scope of the Internal Audit assignment is as follows:

1. Ensuring the internal audit function is in accordance with the Internal Audit Function in Commercial Banks and the Internal Audit Code of Ethics;
2. Allocating audit resources, determining the objectives, scope, and audit plans or schedules and techniques;
3. Determining strategies, methodologies, tools, audit approaches as well as implementation of quality control in carrying out predetermined main tasks, including subsidiaries/affiliates/financial service institutions owned by BNI, relating to the implementation of audits and consultations;
4. Ensuring that IAD Auditors follow continuous professional development and adequate training in their fields in order to keep abreast of company developments;
5. Preparing and reviewing the internal audit charter periodically;
6. Preparing the Annual Audit Plan and Annual Consultation together with the President Director and Board of Commissioners approved budget allocation by considering the Audit Committee recommendations and monitoring its implementation;
7. Reporting significant audit findings to the President Director and the Director overseeing the compliance function to ensure prompt corrective actions are taken, while actively monitoring the follow-up process;
8. Providing periodic reports on the monitoring of audit follow-up actions to the President Director and the Board of Commissioners, with copies submitted to the Audit Committee and the Director responsible for the compliance function, and
9. Ensuring the use of external party for internal audit activities:
    a. Facilitate the transfer of knowledge from external parties to members of the Internal Audit Division (SKAI), with consideration given to the temporary nature of external expert services.
    b. Does not affect the independence and objectivity of the Internal Audit function.
    c. The use of external services is in accordance with the BNI Internal Audit Charter.

Authority of The Internal Audit Unit

In order to the duties and responsibilities can run with optimal results, the Internal Audit Unit is given the authority to:

1. Have full, free and unlimited access to BNI records, information, employees, funds, assets, locations/areas, and other resources, including BNI's subsidiaries/affiliates/financial service institutions, relating to the implementation of audits and consultation;
2. Conduct verification, interviews, confirmations, and other audit techniques with customers or other parties related to the implementation of audits and consultations;
3. Communicate directly with the Board of Directors, the Board of Commissioners and Audit Committee;
4. Conduct regular and incidental meetings with the Board of Directors, the Board of Commissioners and the Audit Committee;

5. Attend strategic meetings;
6. Request assistance from other work units or use the services of external parties in conducting audits if deemed necessary; and
7. Coordinate and build synergistic relationships with other assurance units/functions (compliance unit and risk management) in order to obtain comprehensive and optimal audit results.

Audit Quality Control

The Quality Assurance and Improvement Program (QAIP) implemented by BNI is designed to evaluate the alignment of Internal Audit activities with established standards and the application of the code of ethics. This includes the development of audit methodologies and the refinement of audit programs to align with evolving business processes and best practices. QAIP is conducted through assessments or reviews, both by external and internal parties.

External assessments or reviews are required to be conducted at least once every three years, as stipulated in OJK Regulation No. 1/POJK.03/2019. Following the last review in 2021, BNI appointed PT RSM Consultant to conduct a review of the Internal Audit function in 2024. The results indicated that, in general, the activities of BNI's Internal Audit are in compliance with the Financial Services Authority Regulations No. 1/POJK.03/2019, No. 11/POJK.03/2022, No. 38/POJK.03/2016, and No. 21/SEOJK.03/2017.

Internal audit quality control is carried out by the Quality Control & Report Analysis unit, which conducts assessments to ensure the alignment of BNI's Internal Audit activities with the code of ethics and standards, referencing the International Standards for the Professional Practice of Internal Auditing as formulated by The Institute of Internal Auditors (IIA). The following approaches are employed:

1. Ongoing Monitoring
   Ongoing monitoring aims to ensure that the audit process for each assignment is carried out effectively, including ensuring that activities from planning to audit reporting are conducted in accordance with Internal Audit policies and procedures.
2. Periodic Self-Assessments
   Periodic self-assessments are conducted to comprehensively evaluate Internal Audit activities, focusing on:
   a. Alignment with the Internal Audit Charter, IIA's definition of Internal Audit, the Code of Ethics, and Standards.
   b. The quality of audits, including supervisory quality and adherence to internal audit methodology.
   c. Infrastructure, including policies and procedures that support Internal Audit activities.

The 2024 periodic self-assessments were conducted during the period from January 1, 2023, to September 30, 2024. The results showed that, overall, BNI's Internal Audit activities align with IPPF standards and the code of ethics.

Audit Methodology

In carrying out its duties, Internal Audit develops a comprehensive audit plan at the beginning of the fiscal year, utilizing an audit approach focused on key risks that may affect the achievement of organizational objectives, commonly known as Risk-Based Audit (RBA). By applying this methodology, all Internal Audit activities at BNI, from audit planning, execution, to reporting, are consistently based on the company's risk priorities as determined in collaboration with operational management through risk assessments. The bank ensures that all risks are well-managed and controlled within acceptable limits, as set by management, thereby safeguarding the achievement of corporate goals.

The stages of the Risk-Based Audit methodology applied by BNI are as follows:

1. Preparation of Audit and Consultation Work Plans (RAT) based on Risk-Based Audit through a Macro and Micro Assessment approach:
   a. Macro Assessment: This assessment is based on performance indicators and the risk profile of BNI's activities, referencing the Corporate Plan/General Policy of the Board of Directors (KUD), the Bank's Business Plan (RBB 2024-2026), BNI's Risk Profile, feedback from the Board of Directors and Senior Management, as well as issues or developments in BNI's business, including results from external and internal audits, fraud incidents, and mandatory audits as required by applicable regulations.

      The goal of the Macro Assessment is to identify critical issues for determining audit themes/activities that will focus on business process improvement.

b. Micro Assessment, involving selecting audit targets (critical units) based on a risk assessment of the unit.
c. In addition to risk-based audits, Internal Audit (IAD) also conducts mandatory audits to comply with external/regulatory requirements.

2. Audit Implementation, to ensure the adequacy and effectiveness of risk management and internal control, the audit process is supported by an audit rating methodology for risk management and internal control.
   The rating scale includes satisfactory, good, needs improvement, and unsatisfactory, with assessment components for credit and non-credit/operational activities. The audit rating mechanism is automatically generated through the Audit Monitoring System (FAST), based on the significance level of each finding (low, medium, high, and critical).
3. Audit Reporting, which includes the Audit Results Report, detailing the implementation of all audit activities, and the Audit Results Principles (PPHA), which are reported quarterly to the Financial Services Authority (OJK).

To support the focus of audits and consultations for 2024, which is "Guiding business growth by ensuring optimal employee productivity, process improvement, and IT/digital platform support," and to optimize its role and function as the third line of defense responsible for the effectiveness of the bank's internal control system, the 2024 audit strategy is outlined as follows:

1. Optimal collaboration with assurance functions such as SORX, CMP, ORM, ERM, AFR, and Subsidiary Internal Audit (SKAI).
2. Focus on strategic-level audits aligned with stakeholder concerns and BNI's strategic direction for 2024.
3. Business process improvement through continuous monitoring and surveillance audits using Data Analytics, providing exception reports to delivery channels via the ASR application.
4. Enhancement of the Audit Management System (FAST) through the Data and Technology Refreshment Audit Management System process currently being undertaken by the Information Technology Unit (SKTI).

Independence, Objectivity, & Cooling-Off Period Policy

Internal Audit auditors are required to demonstrate a high degree of independence and professional objectivity in carrying out their duties and responsibilities. They must remain unaffected by personal interests or external influences during audit and consultancy assignments. Consequently, all Internal Audit auditors are obligated to maintain independence and objectivity in adherence to the following provisions:

1. Head of Internal Audit and Auditors are prohibited from:
   a. Holding authority or responsibility for, or participating in, operational activities of BNI or its subsidiaries, affiliates, or financial service institutions owned by BNI.
   b. Simultaneously performing operational tasks or hold positions within the bank, subsidiaries, affiliates, or financial service institutions owned by BNI.
   c. Initiating or approving accounting transactions, except for internal transactions.
   d. Engaging in decision-making processes regarding BNI's operational activities.
2. Internal Audit must establish provisions governing the execution of audit assignments to ensure objectivity and prevent conflicts of interest involving auditors and Internal Audit leadership with respect to the audited entity. Among these provisions is the implementation of a cooling-off period policy.

   In this regard, auditors are excluded from audit assignments involving a particular entity or auditee under the following circumstances:
   a. There are employees in the auditee unit who have familial relationships with the internal auditor up to the second degree, whether horizontal or vertical;
   b. An internal auditor has previously served as an employee in the auditee unit, either in a leadership or non-leadership role. Such auditors may be assigned to audit the unit provided that an audit of the said auditee unit has been conducted at least once and/or after a minimum period of one year has elapsed;
   c. Internal auditors are not permitted to audit the same auditee consecutively as team leader for two assignments
   d. Internal auditors are not allowed to audit an object where they were previously involved in providing consultancy services or other assignments related to that object.
3. The Head of Internal Audit holds the authority to determine the resources and budget necessary to perform duties and functions in accordance with the annual audit plan.

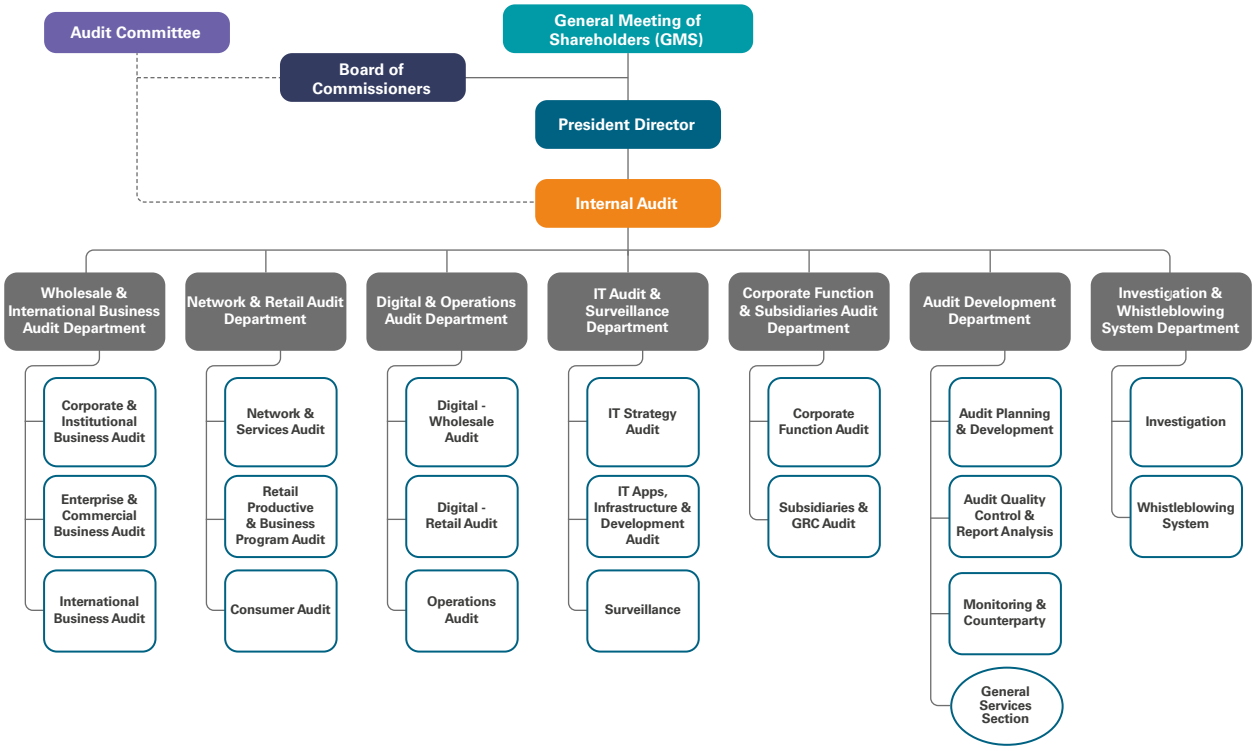
4. Internal auditors are required to disclose any information or circumstances that may impair their independence and objectivity in carrying out audit and consultancy assignments to the Head of Internal Audit.
5. The execution and reporting processes of audit and consultancy activities are subject to review by both internal and external parties.
6. BNI ensures that every member of the Internal Audit Unit meets the independence criteria stipulated by applicable regulations. This independence is upheld through specifically designed audit procedures that prevent conflicts of interest, enabling the audit process to be conducted objectively and transparently. The Internal Audit Unit operates independently from the work units and activities it audits, allowing it to provide professional and objective opinions to the President Director regarding the Bank's business and operational activities. By maintaining these independence standards, the Internal Audit Unit can deliver accurate assessments and support the implementation of Good Corporate Governance (GCG) practices across all of BNI's operational activities.

Structure and Position of the Internal Audit Unit

The Internal Audit Division (IAD) at BNI is directly accountable to the President Director, with a direct communication line (dotted line) to the Board of Commissioners, as stipulated in the Board of Directors Decree No. KP/235/DIR/R dated June 7, 2024, concerning the Organizational Structuring of BNI, and Board of Directors Decree No. KP/136/DIR/R dated April 12, 2023, as well as the updated IAD Organizational Structure based on Decree No. CDV/2/1527/R dated December 21, 2023, regarding the Internal Audit Organizational Structuring. The IAD is authorized to communicate directly and hold meetings with the Board of Directors, the Board of Commissioners, and the Audit Committee while carrying out its duties to ensure assignments are executed effectively and efficiently.

This policy aligns with the provisions of POJK 1/2019 and POJK No. 56/POJK.04/2015, dated December 29, 2015, regarding the Establishment and Guidelines for the Formulation of the Internal Audit Charter.

The organizational structure of the Internal Audit Unit as of December 31, 2024, is outlined in the following chart:



Authority for Appointment and Dismissal of the Head of the Internal Audit Unit [ACGS D.3.16]

The Head of Internal Audit is appointed and dismissed by the President Director, subject to approval from the Board of Commissioners, taking into account the recommendations of the Audit Committee. The appointment or dismissal must be reported to the Financial Services Authority (OJK) in person no later than ten (10) working days after the date of the appointment or dismissal.

The President Director may dismiss the Head of Internal Audit, with the approval of the Board of Commissioners and based on the recommendations of the Audit Committee, if the individual fails to meet the requirements to lead BNI's internal audit function as stipulated by applicable regulations and/or is deemed incapable or ineffective in performing their duties.

Head of Internal Audit Unit Profile [ACGS D.3.15]

The Internal Audit Unit is led by Johansyah effective from March 20, 2024, in accordance with the Decree of the Board of Directors No. KP/104/DIR/R dated March 18, 2024. Johansyah's appointment as Head of BNI IAD has been reported to OJK based on letter No. DK/36/R & DIR/050/R dated March 20, 2024. The brief profile of the Head of IAD is as follows:



Johansyah
Head of Internal Audit Unit

Age
43 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's degree in Law from Universitas Hasanuddin
- Master's degree in Notary Affairs from Universitas Jayabaya

Legal Basis of Appointment
The Board of Directors Decree No. KP/104/DIR/R dated March 18, 2024

Term of Office
March 20, 2024 - present

Professional Certification and/or Training
1. Certified Bank of Internal Audit (CBIA) Audit Manager-Qualification VI KKNI (LSPP)
2. Bank Internal Audit Certification Briefing Level Audit Manager (IAIB)
3. BoD-1 Top Talent Program (TOP GUN) Cohort 1 (BUMN School of Excellence and IMD Business School)
4. The Professional Service Firm leader (Cambridge Judge Business School)
5. Banking Transformation in EMP by Harvard Business Publishing (BNI)
6. BUMN Muda Mentorship Program (BUMN Muda)
7. Executive Management Program (Korn Ferry)
8. Risk Management Certification Level 1 to 4 or Equivalent to Qualification Level 4 to 6 (Risk Management Certification Agency)
9. Registered Curator and Administrator (AKPI)
10. Legal Risk Strategy for Credit Recovery (BNI)
11. Sworn and Registered Advocate (PERADI)

Work Experience
At BNI
1. Head of Internal Audit Unit (2024 – present)
2. Head of Corporate Remedial & Recovery Division (2023 – 2024)
3. Head of Legal Division (2018 – 2023)
4. VP of Criminal Litigation and Claims (2018)
5. Civil Case Group Leader of Legal Division (2014 - 2018)
6. MGR Corporate Recovery of PRC Division/Manager of Corporate Credit Settlement of PSC Division (2011 - 2014)
7. Jurist/Legal Expert of Civil Case in Legal Division (2006 - 2011)

Concurrent Position
Does not hold concurrent positions both internally and externally BNI

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders

Internal Audit Human Resources Composition

In carrying out its function, Internal Audit is supported by competent human resources with adequate qualifications. As of December 31, 2024, the number of personnel in BNI's Internal Audit totals 205 individuals, including the Head of Internal Audit. The selection of Internal Audit personnel consistently considers aspects of diversity, including work experience, areas of expertise, and relevant professional certifications related to the Internal Audit function. Below is the composition of BNI's internal auditors as of December 31, 2024:

Position	Number (Person)
Head of Internal Audit	1
Department Head	7
Lead Auditor	14
AVP Unit Supporting Audit	5
Senior Auditor	49

Position	Number (Person)
MGR Unit Supporting Audit	15
Auditor	90
AMGR Unit Supporting Audit	19
Administrative Assistant	4
Retirement Preparation Period (MPP)	1
Total	205

Internal Auditor Certification

In striving for the continuous professional development of auditors, Internal Audit is committed to consistently enhancing the competence and knowledge of auditors who proactively participate in various development programs and competency improvement activities. These include certified educational programs, both national and international, as well as relevant training, seminars, and workshops that support audit performance. This ongoing initiative is carried out consistently to ensure that the unit meets adequate qualifications as an independent and objective work unit.

The certifications that IAD employees have obtained during 2024 (November position) are as follows:

International Professional Certification	Realization in 2024
Certified Internal Auditor (CIA)	2
Certified Bank Auditor (CBA)	2
Certified Information System Auditor (CISA)	6
Certified Fraud Examiner (CFE)	1
Certified Information Security Manager (CISM)	3
Certified E-Business Professional Project Management (CEPPM)	4
Certified Ethical Hacker (CEH)	4
Computer Hacking Forensic Investigator (CHFI)	6
Information Technology Infrastructure Library (IT IL)	17
Certified Data Science for Manager (CDSM)	3
Certified Governance, Risk and Compliance Professional (GRCP)	4
Certified Governance, Risk and Compliance Auditor (GRCA)	3
Certified Integrated Policy Management Professional (IPMP)	1
Certified Integrated Data Privacy Professional (IDPP)	1
Certified in Risk and Information System Control (CRISC)	1
Certified in the Governance of Enterprise IT (CGEIT)	1
Certified in Cybersecurity (CC)	4
ISO 9001: 2015	10
ISO 2001:2015	1
ISO 37001: 2016	20
ISO 30301: 2019	1

National Professional Certification	Realization in 2024
Risk Management Certification Level 1	86
Risk Management Certification Level 2	66
Risk Management Certification Level 3	6
Risk Management Certification Level 4	2
Risk Management Certification Level 5	1
Certified Bank of Internal Audit - Auditor	67
Certified Bank of Internal Audit - Supervisor	83
Certified Bank of Internal Audit - Manager	1
Certified IT Procurement Expert (CITPE)	6

National Professional Certification	Realization in 2024
Chartered Accountant (CA)	4
Credit Skill Omega	7
Compliance 1 LSPP Level Officer	1
Certified Legal Auditor (CLA)	1
Certified Internal Audit Executive (CIAE)	1
Archives Certification (ANRI)	1
Communication & Leadership Skills Certification	1

Code of Ethics for Internal Auditors

In carrying out their duties and responsibilities, Internal Audit must act professionally and uphold the established code of ethics, which must be adhered to by all auditors, as follows:

1. **Integrity**
   a. Perform duties honestly, diligently, and responsibly;
   b. Comply with laws and make disclosures in accordance with applicable regulations and professional standards;
   c. Not intentionally or knowingly engage in prohibited or illegal activities, nor take actions that may damage the credibility of Internal Audit and the profession of Internal Auditors; and
   d. Support the goals of BNI and Internal Audit.
2. **Objectivity**
   a. Not engage in activities or have relationships that may create a conflict of interest;
   b. Not accept anything that could or is perceived to affect professional judgment;
   c. Always exercise professional judgment in the performance of duties in any situation or condition; and
   d. Disclose all known facts.
3. **Confidentiality**
   a. Be cautious in using and safeguarding information obtained during the performance of duties; and
   b. Not use information for anyone's benefit and/or in any way that would violate the law and/or company regulations.
4. **Competence**
   a. Perform duties in accordance with the knowledge, skills, and experience possessed;
   b. Conduct audits in accordance with the Application of Internal Audit Functions in Commercial Banks and/or other applicable audit standards; and
   c. Continuously improve competence.

Internal Audit Meetings with the Board of Commissioners, the Board of Directors, and Audit Committee

Meeting Policy

The Internal Audit Charter stipulates that IAD has the authority to communicate directly and hold meetings, both regularly and incidentally, with the Board of Directors, Board of Commissioners, and the Audit Committee. This is done to support the effective and smooth execution of duties. These meetings are part of the authority of the Internal Audit Unit to ensure the effectiveness of assignments.

Meeting Frequency and Attendance Rate

Throughout 2024, IAD has held and attended, either as participants or by presenting, 44 (forty-four) meetings with the Board of Directors, Board of Commissioners, Audit Committee, and other Committees. The frequency and attendance rate of IAD meetings are outlined in the following table:

Number of Mandatory Meetings	Total Attendace	% Attendace
61	61	100%

Description	BOD Meeting	BOC Meeting	Audit Committee Meeting	Other Committee Meeting
IAD Attendance Frequency	52 times	18 times	9 times	8 times

Meeting Agenda

In 2024, 61 (sixty-one) IAD meetings were held to discuss various agendas as described in the following table:

No.	Meeting Date	Meeting Agenda	Notes
1	Jan 9, 2024	Discussion of Leading and Lagging Indicators for Risk Profile: 1. Credit, Market, & Liquidity 2. Operational, Legal, Strategic, Compliance, Reputation	Risk Monitoring Committee
2	Jan 30, 2024	Credit evaluation of the Commercial Banking segment, including: 1. Evaluation of the realization and target of the Commercial Banking segment (per CMC) in 2023, including Lessons Learned, Pain Points, Root Causes, and improvement steps, based on the results of achieving targets/ performance in 2023 and Audit findings. 2. Explanation of RBB targets per each CMC in 2024 3. Procedures/mechanisms for determining Pipeline Management for the Commercial Banking segment, as well as presentation of pipelines, target markets, priority sectors per each CMC in 2024 4. Evaluation of the quality of credit decisions for the Commercial Banking segment per each CMC during 2022-2024, including presentation of Vintage Analysis per quarter.	• Risk Monitoring Committee • Board of Directors
3	Jan 23, 2024	Evaluation of the internal audit function Semester II/2023, including: 1. Realization of IAD RAT 2. Main Audit Results 3. Progress of Follow-up of IAD and External Auditor Examination 4. Management of the Whistleblowing System (WBS)	Audit Committee
4	Feb 6, 2024	Results of the Review of the Difference in the Report Balance in 2023	Audit Committee
5	Feb 15, 2024	Results of the IAD Review - Events of the Difference in the Report Balance in 2023, based on the IAD Review Results Report No. IAD/4/187/2023/LHR/R dated December 15, 2023	• Board of Commissioners • Board of Directors
6	Mar 5, 2024	ALCO March 2024	Board of Directors
7	Mar 19, 2024	Proposal for the Division of Directors' Duties	Board of Directors
8	Mar 19, 2024	Presentation by the Deputy President Director and Head of IAD regarding: 1. Evaluation of the Effectiveness of the Integrated Internal Control System (SPI) Semester II/2023 2. Evaluation of the Effectiveness of the Integrated Audit Work Unit Semester II/2023 3. Improvement of the quality and number of Auditors in Subsidiaries 4. Results of Internal Audits of Subsidiaries and their follow-up.	• Deputy President Director • Integrated Governance Committee
9	Mar 25, 2024	Technology Management Committee – Standardization & Centralization of IT Overseas Office (KLN)	Board of Directors
10	Mar 26, 2024	Consultation on Credit Write-off Plan with Limit above Rp100 Billion to Rp200 Billion	• Audit Committee • Board of Directors
11	Apr 22, 2024	1. Crisis Management Protocol for Liquidity Risk 2. Financial Performance March 2024	Board of Directors
12	Apr 29, 2024	Technology Management Committee – IT Project Portfolio Q1/2024	Board of Directors
13	Apr 30, 2024	Internal Audit Function Evaluation for Q1/2024: 1. Realization of IAD RAT 2. Main Audit Results (including the results of the In-depth Report) 3. Progress of Follow-up of IAD and External Auditor Examination 4. Management of the Whistle Blowing System (WBS)	Audit Committee
14	Apr 30, 2024	Evaluation of Loan at Risk and Write-off in Corporate Banking and Enterprise Banking Segments for March 2024 position (including analysis related to credit, operational, legal and reputation risks)	• Audit Committee • Board of Directors
15	May 14, 2024	Evaluation of the Effectiveness of the Implementation of Anti-Fraud Strategy and Whistle Blowing System (WBS) at the BNI Financial Conglomerate for the period Smt.II/2023	• Board of Directors • Integrated Governance Committee
16	May 28, 2024	ALCO May 2024	Board of Directors
17	May 30, 2024	Consultation regarding the Plan for Credit Write-Off with a limit above Rp200 billion	• Board of Commissioners • Board of Directors
18	Jun 6, 2024	Discussion on the Evaluation of BNI's Internal Control System and Evaluation of the Effectiveness & Efficiency of the Implementation of the Company's Internal Audit Tasks	• Board of Commissioners • Board of Directors
19	Jun 20, 2024	Consultation regarding the Plan for Credit Write-Off with a limit above Rp200 billion	• Board of Commissioners • Board of Directors
20	Jun 27, 2024	Consultation regarding the Plan for Credit Write-Off with a limit above Rp200 billion	• Board of Commissioners • Board of Directors

No.	Meeting Date	Meeting Agenda	Notes
21	Jun 24, 2024	Digital Maturity Assessment for Bank (DMAB)	Board of Directors
22	Jul 4, 2024	1. Discussion of Consultation Follow-Up on Credit Write-Off Plan with Limit Above IDR200 Billion 2. Discussion of Approval on Review of General Policy of Internal Control System (Kuspi) Based on Director's Letter No. Dir/368 Dated May 16, 2024	• Board of Commissioners • Board of Directors
23	Jul 9, 2024	Performance Update Q2/2024	Board of Directors
24	Jul 16, 2024	Internal Audit Function Evaluation for Semester I/2024: 1. Realization of IAD RAT 2. Main Audit Results (including the results of the In-depth Report) 3. Progress of Follow-up of IAD and External Auditor Examination 4. Management of the Whistle Blowing System (WBS)	Audit Committee
25	Jul 16, 2024	Evaluation of Loan at Risk and Write-off in the Region for the position of June 2024, as well as in-depth research especially in Regions with high LaR (including analysis related to credit, operational, legal and reputation risks)	• Risk Monitoring Committee • Board of Directors
26	Jul 29, 2024	ALCO July 2024	Board of Directors
27	August 7, 2024	Technology Management Committee (KMT) 1. IT Project Implementation & IT CAPEX Realization Progress 2. Enterprise Collaboration Platform Solutions 3. Core Banking Optimization	Board of Directors
28	August 12, 2024	Performance Review July 2024: Bankwide and Region	Board of Directors
29	August 19, 2024	Technology Management Committee (IT Project Portfolio Q2/2024)	Board of Directors
30	August 29, 2024	Presentation of the Results of the Review of BNI's Internal Audit Function based on IAD Letter No. IAD/7.2/0755 dated August 2, 2024	• Board of Commissioners • Board of Directors
31	Sep 17, 2024	Presentation of Deputy President Director and Head of IAD regarding: 1. Evaluation of the Effectiveness of the Integrated Internal Control System (SPI) Semester I/2024 2. Evaluation of the Effectiveness of the Integrated Audit Work Unit Semester I/2024 3. Improvement of the quality and number of Auditors in Subsidiaries 4. Results of Internal Audit of Subsidiaries and their follow-up.	• Deputy President Director • Integrated Governance Committee
32	Sep 23, 2024	Update Go to Market Corporate Portal – Project Avatar	Board of Directors
33	Sep 30, 2024	Kick Off Meeting for Audit Implementation by KAP RJRR (PWC) December 2024	Board of Directors
34	Oct 7, 2024	Financial Performance September 2024	Board of Directors
35	Nov 4, 2024	1. Approval of the IT Strategic Plan (ITSP) 2024-2028 2. It Project Implementation 2024 & IT Capex Realization 2024 Progress	Board of Directors
36	Nov 5, 2024	Consultation on the Plan to Write-off Loans with a limit of above Rp100 Billion to Rp200 Billion	• Board of Commissioners • Board of Directors
37	Nov 7, 2024	1. Follow-up of audit findings and recommendations from the Bank's internal audit unit, external auditors, BPK audit, BPKP audit, OJK supervision results and/or other authorities' supervision results as of Quarter 3, 2024. 2. Consultation on the Plan to Write-off Loans with a limit of more than Rp100 Billion to Rp200 Billion	• Board of Commissioners • Board of Directors
38	Nov 17, 2024	Financial Performance August 2024 and Financial Forecast September 2024	Board of Directors
39	Nov 12, 2024	1. Agenda I: Evaluation of 2024 Integrated Governance Guidelines 2. Agenda II: TKT Committee Work Plan for 2025	• Board of Directors • Integrated Governance Committee
40	Nov 19, 2024	Consultation on the Plan to Write-off Loans with a limit of above Rp100 Billion to Rp200 Billion	• Audit Committee • Board of Directors
41	Nov 25, 2024	Performance Review November 2024	Board of Directors
42	Dec 2, 2024	Technology Management Committee (KMT) 1. IT Project Implementation & IT CAPEX Year 2024 & 2025 Update 2. Core Banking Update	Board of Directors
43	Dec 3, 2024	Discussion regarding the update of wondr by BNI application	• Board of Commissioners • Board of Directors
44	Dec 3, 2024	Consultation on the Plan to Write Off Loans with Limit above Rp100 Billion to Rp200 Billion	• Audit Committee • Board of Directors
45	Dec 4, 2024	Kick Off Preparation of Annual Report and Sustainability Report BNI Year 2024	Board of Directors
46	Dec 5, 2024	Consultation on Credit Write-off Plan with limit above Rp200 Billion.	• Board of Commissioners • Board of Directors
47	Des 5, 2024	Discussion of Request for Approval of the Review of Bank Credit Policy (KPB) Year 2024	• Board of Commissioners • Board of Directors

No.	Meeting Date	Meeting Agenda	Notes
48	Dec 5, 2024	Discussion on Follow-up Recommendations on the Implementation of the Review of the Internal Audit Function in 2024 by PT RSM Konsultan Indonesia	Audit Committee
49	Dec 5, 2024	Consultation on the Plan to Write-off Loans with a limit of more than Rp200 Billion	• Board of Commissioners • Board of Directors
50	Dec 5, 2024	Discussion of Request for Approval of Review of General Policy on Risk Management (KUMR) and General Policy on Integrated Risk Management and Integrated Capital (KUMRT) Year 2024	• Board of Commissioners • Board of Directors
51	Dec 9, 2024	Proposed Policy for the Write-off of Bad Debts of MSME Debtors in accordance with Government Regulation No. 47 Year 2024	Board of Directors
52	Dec 9, 2024	Discussion on Corporate Guidelines for Bank Financial Reporting Integrity	Board of Directors
53	Dec 12, 2024	Consultation on the Plan to Write-off Loans with a limit of more than Rp200 Billion.	• Board of Commissioners • Board of Directors
54	Dec 12, 2024	Discussion of Evaluation of BNI Payment Services, including policies, governance, risk management, ownership and control structure, and information system security standards in BNI Payment Services.	• Board of Commissioners • Board of Directors
55	Dec 17, 2024	Discussion of the Board of Commissioners' Approval of the MSME Debtor Write-off Policy in accordance with Government Regulation No. 47 of 2024	• Board of Commissioners • Board of Directors
56	Dec 19, 2024	Discussion of General Policy on Internal Control System (KUSPI) and Internal Control Over Financial Reporting (ICOFR)	• Board of Commissioners • Board of Directors
57	Dec 19, 2024	Town Hall Meeting	Board of Directors
58	Dec 19, 2024	Financial Performance Update November 2024 & Prognosis December 2024	Board of Directors
59	Dec 23, 2024	Debtor Post Mining Guarantee Fund	Board of Directors
60	Dec 24, 2024	BNI Financial Conglomeration Examination Report Year 2024	Integrated Governance Committee
61	Dec 27, 2024	Update on Digital Maturity Assessment for Bank (DMAB) Progress	Board of Directors

Training and Competency Development of the Internal Audit Unit in 2024

Development of Internal Audit Human Resources Competencies

IAD is committed to developing the competencies and capabilities of its auditors. To support this development, IAD has established a training/refreshment policy requiring all auditors to participate in a capability enhancement program at least once a year. The competency development programs implemented by IAD throughout 2024 are as follows:

Competency Development/Training Materials	Organizer	Implementation Time
Annual Training		
Auditor Annual Training	BNI University (BNU) & IAD	January 2024
Online/Offline Sharing Session & Webinar		
Webinar with the theme "BNI Receivable Solution"	BNI University (BNU)	March 2024
Sharing Session on PDP Law with the theme "What Next to Do to Implement PDP Law for BUMN"	FORDIGI BUMN in collaboration with Jasa Marga and PGN	May 2024
Webinar with the theme "Opportunities for Credit Growth After the End of the Credit Restructuring Policy"	OJK Institute	May 2024
Anti Fraud Awareness Webinar - "Avoid Online Gambling and Illegal Online Loans"	BNI University (BNU)	May 2024
Webinar with the theme "Opportunities and Challenges of Personal Data Protection in transactions in the Digital era"	OJK Institute	May 2024
Webinar Governance, risk, & Compliance Series 1-3 "Risk Mitigation through Cyber Security Strategy and the Role of Integrated GRC as the Key to Resilience and Sustainable Business growth"	BNI University (BNU)	June 2024
Webinar Business Ethic Series 1-3: "Ensuring Compliance: Social Media in Regulated Industry and Organizational Strengthening through Conflict of Interest Prevention and Management"	BNI University (BNU)	July 2024
Webinar with the theme "Transparency and Public Information Disclosure in BNI Consumer Protection"	Central Information Commission of the Republic of Indonesia	September 2024

Competency Development/Training Materials	Organizer	Implementation Time
PDP Socialization Series 1-3: "Data Privacy and Data Protection Awareness"	BNI University (BNU)	September 2024
Sharing Session by Wealth Management Division (WEM) with the theme: 1. Money and Debt Management 2. Investment (Mutual Funds, Bonds) and Risk Management 3. Other literacy related to Financial Planning	Wealth Management (WEM)	October 2024
Leadership Series webinar with the theme: 1. Optimizing Organizational Transformation Through Strategic Delegation 2. Leadership Development & Organizational Resilience in a Transforming Industry 3. Experience the Agile & Digital Mindset - Transforming Markets & Fostering Collaboration 4. Developing a Global Mindset Towards Future Business Ecosystems	BNI University (BNU)	November 2024
Socialization of Digi Code/DigiCM	Policy Governance (PGV)	December 2024
Socialization of wondr by BNI Version 1.2.0	Retail Digital Channel (RDC)	December 2024
Certification Training Program		
Certified Internal Auditor (CIA) Learning Program and CIA Exam Implementation	Institute of Internal Auditor (IIA)	July – October 2024
Certified Information Systems Auditor (CISA) Learning Program and CISA Exam Implementation	Information Systems Audit and Control Association (ISACA)	July – October 2024
Certified in Cybersecurity (CC-ISC2) Learning Program and CC Exam Implementation	International Information Systems Security Certification Consortium (ISC2)	August - December 2024
Bank Internal Audit Competency Test and Certification Debriefing - Auditor Level	Internal Bank Auditor Association (IAIB) & Banking Professional Certification Institute (LSPP)	March - July 2024
Debriefing of Competency Test and Certification for Bank Internal Audit - Audit Supervisor Level	IAD & Banking Professional Certification Institute (LSPP)	August - September 2024
Competency Test Debriefing and Bank Internal Audit Certification - Audit Manager Level	Internal Bank Auditor Association (IAIB) & Banking Professional Certification Institute (LSPP)	March 2024
Implementation of Risk Management Certification (SMR) Qualification Level 4 (Equivalent to Level 1)	BNI University (BNU) & Banking Professional Certification Institute (LSPP)	July - December 2024
Risk Management Certification Maintenance Program (SMR) Qualification Level 5 (Equivalent to Level 2 & 3)	BNI University (BNU) & Banking Professional Certification Institute (LSPP)	July - December 2024
Risk Management Certification Maintenance Program (SMR) Qualification Level 6 (Equivalent to Level 4)	BNI University (BNU) & Banking Professional Certification Institute (LSPP)	July - December 2024
In-House Online Training		
Mandatory E-Learning: • Gratification Control & Anti-Bribery Management System • Anti Fraud Awareness • Anti-Money Laundering • Work Culture • Good Corporate Governance • Risk Culture • Sustainability Finance • Security Awareness	BNI University (BNU)	January – December 2024
Internal Sharing Session In addition to the above auditor competency development, IAD always improves auditor competency through internal sharing sessions to improve audit skills and accelerate auditor knowledge of the latest BNI business developments.		
Sharing Knowledge with the theme "Inspection of Commercial Business Centers and Branch Offices"	IAD	July 2024
Sharing Session with the theme "Evaluation of Audit Process Semester 1"	IAD	July 2024
Sharing Session with the theme "Navigating Global International Audit Standard (GIAS) in IAD BNI"	IAD	July 2024

Competency Development/Training Materials	Organizer	Implementation Time
Sharing Session with the theme "PP Update regarding CCTV Outlet"	IAD	August 2024
Sharing Session with the theme "Global International Audit Standard & Audit RCC Jakarta Kota"	IAD	August 2024
Quality Month with the theme "Implementation of POJK No.22/2024 on Consumer and Community Protection in the Financial Services Sector"	IAD	August 2024
Socialization of Distribution of Audit Result Details (RHA) and Audit Result Report (LHA)	IAD	September 2024
Sharing Session with the theme "Key Take Away of OJK Digital Resilience Guide"	IAD	October 2024
Sharing Session with the theme "The Security Habits"	IAD	October 2024
Sharing Session with the theme "Implementation of New Sales Model and Related Issues and Their Impact on Sales Performance"	IAD	December 2024
Sharing Session with the theme "Restructuring Implementation"	IAD	December 2024
Sharing Session with the theme "Integrated Commercial Bank Report (LBUT)"	IAD	December 2024
Sharing Session with the theme "Collective Account Opening Process"	IAD	December 2024
Sharing Session with the theme "Financial Information Service System (SLIK)"	IAD	December 2024
Sharing Session with the theme "Re-understanding the Business Group"	IAD	December 2024
Sharing Session with the theme "Whistleblowing System (WBS)"	IAD	December 2024
Conference/Workshop		
Road to Internal Auditor Conference 2024 Seminar with the theme "Global Internal Audit Standards (GIAS) with Local Perspective: Exploring the Practice of Internal Auditing"	Education Foundation Internal Audit (YPIA)	May 2024
Workshop Navigating The Global Internal Audit Standards	Institute of Internal Auditor (IIA) Indonesia	June 2024
Regional ACIIA 2024 Conference with the theme: 'Purposeful Impact'	Institute of Internal Auditor (IIA) Indonesia	August 2024

Development of Internal Audit Leader Competencies

In 2024, the Head of Internal Audit has participated in a number of training sessions, seminars, workshops, and certification programs related to the auditing profession, with the following details:

No.	Activity Title	Date Implemented	Organizer
1	Certified Bank of Internal Audit (CBIA) Audit Manager-Qualification VI KKNI	2024	Banking Professional Certification Institute (LSPP)
2	Bank Internal Audit Certification Debriefing, Audit Manager Level	2024	Internal Bank Auditors Association (IAIB)
3	Bank Internal Audit Certification Debriefing, Audit Supervisor Level	2024	Internal Bank Auditor Association (IAIB)
4	Bank Internal Audit Certification Debriefing, Auditor Level	2024	Bank Internal Auditor Association (IAIB)
5	JK 6 Risk Management Certification	2024	National Professional Certification Agency (BNSP)
6	AKPI Continuing Education - AYDA in the Bankruptcy Estate Disposal Process and the Constraints that Arise in Practice.	2024	Indonesian Curators and Administrators Association (AKPI)
Public Training/Conference			
1	BoD-1 Top Talent Program (TOP GUN) Cohort 1 (BUMN School of Excellence dan IMD Business School)	2024	BUMN School of Excellence (BSE) & IMD Business School - Swiss
2	Global Immersion with the theme "Global Business Perspective and Leadership"	2024	BUMN School of Excellence (BSE) & IMD Business School - Swiss

Participation in the Internal Audit Unit Professional Association

In order to broaden horizons and improve professional competence amidst various industry challenges, Internal Audit involves internal auditors in various audit-related professional associations, including:

Internal Audit Participation in External Organizations

Name of Internal Auditor	Position	Name of Association/ Organization	Scope of Association/ Organization	Membership Role
Johansyah Dias Puspita	Head of IAD Head of Auditor Digital Retail Audit	The Institute of Internal Auditors - Indonesia (IIA)	International	Member
Johansyah	Head of IAD	Perhimpunan Bank Nasional (PERBANAS)	National	Member of Perbanas Law and Regulations Working Committee
Laksmi Sofiatin Adnan Rifanadhi Nanny Handayani	• Network & Retail Audit Department Head • Head of Auditor Wholesale & International Business Audit Department • Lead Auditor Wholesale & International Business Audit Department	Ikatan Auditor Intern Bank (IAIB)	National	• Head of Research & Development • Certification & Ethics Manager • Research and Development Management
Laksmi Sofiatin	Network & Retail Audit Department Head	Ikatan Akuntan Indonesia (IAI)	National	Member
M. Irfan Maulana Dias Puspita	• Audit & Surveillance Department Head • Head of Auditor Digital Retail Audit	Information Systems Audit and Control Association (ISACA)	International	• Marketing & Communication Director • Member
Imam Wibowo Sakti	Corporate Function & Subsidiaries Audit Department Head	Association of Certified Fraud Examiner (ACFE)	International	Member
Yazid Priadi Erfiandi	Head of Auditor IT Strategy Audit	International Information System Security Certification Consortium (ISC2)	International	Member
Marvel Ganda Alvaro	Auditor Subsidiaries, Governance, Risk, & Compliance Audit	Open Compliance and Ethics Group (OCEG)	International	Member

Internal Audit Work Plan for 2024

In order to support BNI's strategic goals for 2024, Internal Audit has prepared an initiative strategy outlined in the 2024 Internal Audit Business Plan and Annual Audit Plan. These are explained as follows:

1. Monitoring the Expansion of Quality Business with the following scope:
   a. Top Tier Clients and Priority Sectors;
   b. RM/Sales Productivity;
   c. Retail Banking;
   d. Pipeline Management
2. Monitoring the optimization of digital channels and business networks to enhance transaction banking and improve business processes.
3. Monitoring the optimization of the BNI Group through overseeing international business and subsidiaries.
4. Monitoring IT capability, support, and security to support business transactions and operational excellence.
5. Value-added services through activities such as consulting, surveillance, whistleblowing systems, and liaison activities.
6. Enhancing audit methodology and tools to support business processes in the digital era.
7. Strengthening and developing auditors to support high-quality audit activities.

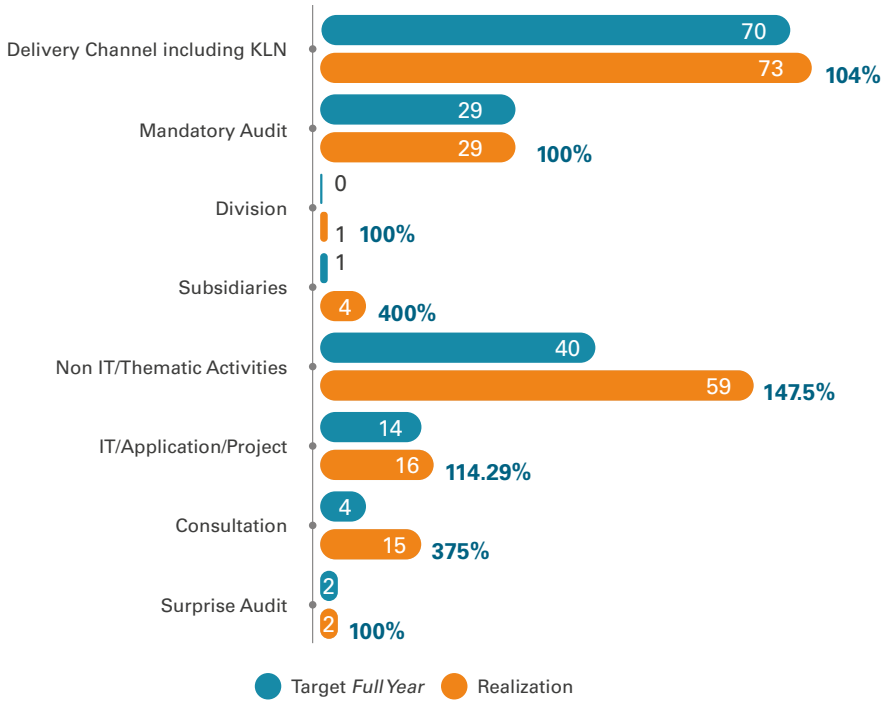
Based on the analysis of BNI's strategic policy direction for 2024, risk assessment, audit execution priorities, human resource availability, and the challenges facing Internal Audit, as well as the banking digitalization trend to meet customer needs through digital-based transactions. Internal Audit Unit has established the audit execution strategy for 2024 as follows:

1. Optimal Collaboration with Assurance Functions, including SORX, CMP, ORM, ERM, AFR, and SKAI Subsidiaries, which includes:
   a. Optimizing SORX output data as risk mapping data for IAD.
   b. Utilization of exception report and selected report data from the IAD Surveillance unit to support SORX examination as BNI's internal assurance provider.
   c. Dividing the investigation function with SORX;
   d. Optimizing ERM and ORM output data as risk mapping data for IAD;
   e. The audit investigation forum to determine the investigation execution;
   f. Dividing the investigation function with AFR;
   g. Integration between the Internal Audit Units (SKAI) of BNI and its subsidiaries.
2. Audit Focus is Directed at the Strategic Level, aligned with Stakeholder Concerns and BNI's Strategic Direction for 2024.
   a. Increase audits on strategic activities/issues so that they can recommend and improve business processes at BNI.
   b. Optimize the consultation function, including through Independent Reviews of new product/activities issuance, reviews, and the monitoring of projects for digital business development at BNI, as well as assigning IAD employees to specific project teams while maintaining independence, objectivity, and the Internal Audit Code of Ethics.
   c. Conduct mandatory audits to comply with regulatory requirements.
3. Improvement Business Process through continuous monitoring & surveillance audit including:
   a. Optimization of data analytics surveillance for general audits and thematic audits with a more focused audit sample determination.
   b. The Annual Audit Plan is reviewable and adjusts to the development of BNI›s business.
4. The implementation of in-depth audits is optimized by utilizing mandays from the Investigation & System Whistleblowing Department.
5. Available mandays are optimized for continuous auditing, consultation, audit sharing, and auditee monitoring.
6. Enhancement of the Audit on Management System (FAST) through Enhancement of Data & Technology Refreshment process for the Audit Management System, currently being carried out by the Information Technology Work Unit (SKTI).

Report on the Realization of Internal Audit and Consulting Assignments for 2024

BNI's Internal Audit has completed 122.08% of the planned audit assignments throughout 2024, in line with the initial assignment plan (163 assignments). The realization of audit delivery channels, divisions, overseas offices, and subsidiaries reached 109.86%, while the realization of thematic audits, IT activities, non-IT applications, IT applications, independent reviews, consultations, and mandatory audits reached 131.52%, as follows:

Audit Assignments in 2024



In 2024, IAD conducted both regular and ad-hoc audits. Regular audits are planned activities outlined in the annual audit plan and are performed using a risk-based audit approach. Meanwhile, ad-hoc audits are special activities outside the annual work plan, carried out based on discussions or requests from management, the auditee, or IAD's initiative.

The implementation of regular and ad-hoc audits conducted by Internal Audit throughout 2024 is explained as follows:

A. IAD carried out 4 ad-hoc assignments, as follows:
   1. Audit of Investment Fund Product Management at the Palu Branch
   2. Audit of Investment Fund Product Management at the Manado Branch
   3. Audit of the Basic Interest Rate (SBDK) Data Verification Activity for KUR in 2023
   4. Administration of the BNI Wave I Transformation Project.

B. IAD conducted a total of 23 investigative audits with details of 10 assignments for credit examination, 13 assignments for non-credit examination.

C. IAD also provided consulting services, both formal and informal, including Independent Reviews of new product launches/activities that can be used to meet OJK requirements, overseeing specific events based on requests from the auditee, management, or IAD's initiative. The consulting services during 2024 were as follows:
   1. Independent Review of Direct Debit BI-FAST
   2. Independent Review of Request for Payment BI-FAST
   3. Independent Review of the Development of Credit Card Indonesia Features and Online Payment Acceptance
   4. Independent Review of QRIS Cross Border
   5. Independent Review of Corporate Portal - Project Avatar
   6. Independent Review of New BNI Mobile Banking (wondr by BNI)
   7. Independent Review feature of Auto Top Up E-Wallet & Activation of Dormant Account on wondr by BNI.
   8. Audit of Regulatory Ratio and Reporting Compliance at KLN
   9. Review of the Update of the International Business PP (including CCOB & CMOB)
   10. Review of BNIdirect
   11. Limited Review of E-Channel Activation at Renon Branch in 2024
   12. Consultation for the Java Jazz Festival Event in 2024
   13. Review of Cybersecurity Maturity Level Assessment
   14. Consultation on NRA for KUR write-offs
   15. Branch Office Consultation - Debtor Deposit Management

Submission of Audit and Consultation Results in the form of an Audit Result Report (LHA) is submitted and reported to the President Director, Board of Commissioners, Audit Committee, and Director of Human Capital & Compliance, and the Sector Director in charge of the auditee.

Follow-up on Audit Results

As part of the audit process, after the audit report is completed, Internal Audit is required to monitor the audit results. Monitoring activities aim to determine and ensure that follow-up actions on audit results, including the resolution of Internal Audit Recommendations and the Board of Directors Dispositions, are carried out by the auditee and other relevant parties.

Every quarter, Internal Audit submits progress on the resolution of audit follow-ups in the form of a Pending Audit Follow-up Report to the Board of Directors, SEVP, and the Board of Commissioners through the Audit Committee. This report plays a key role in monitoring the progress of audit follow-up resolution, encouraging faster completion, and serves as the basis for evaluation and performance monitoring of BNI.

Number of Internal Audit Findings and Follow-up in 2024

The level of completion of pending follow-up, Audit Recommendations and Directors' Disposition on audit results for 2022-2024 are as follows:

Description	December 31, 2024	December 31, 2023	December 31, 2022
Total Due	22,281	25,655	16,976
Completed	22,255	23,643	16,927
Completion Progress	99.88%	92.16%	99.71%

In relation to the role of Internal Audit as a liaison for external parties, such as the OJK, BI, BPK, and KAP, BNI's IAD also monitors the follow-up on the results of external audits. Throughout 2024, the follow-up on external audit results is reflected in the table below:

External Audit	2024	
	Completed	In Progress
Bank Indonesia (BI)	127	3
Financial Services Authority (OJK)	994	0
Indonesian Audit Board (BPK RI)	380	72
Public Accountant Firm (KAP)	13	0

Assessment and Evaluation of the Internal Audit Unit's Performance in 2024

In 2024, the Internal Audit Department (IAD) achieved a User Satisfaction Survey (USS) Index score of 3.93, an improvement from the previous year's score of 3.91. This reflects enhancements in the quality and effectiveness of the Internal Audit function at BNI.

Performance evaluation was also conducted through the distribution of questionnaires to auditees and their supervisors after the audit process. The assessment covered various aspects, including audit management, audit execution, reporting of audit findings and IAD recommendations, as well as the competency, professionalism, and communication of the audit team. The evaluation yielded an average score of 4.58 out of a maximum of 5.

Integrated Internal Audit Work Unit (SKAIT)

In order to implement comprehensive and effective Integrated Governance (TKT), BNI, as the Parent Entity (EU), has incorporated the function of integrated internal audit within its Internal Audit organization to oversee the application of internal audit functions across each Financial Services Institution (LJK) within the BNI Financial Conglomerate (KK). Acting as a professional, independent, and objective business partner to Management, BNI's Internal Audit strives to perform assurance and consulting functions independently and objectively, while integrating with the Internal Audit Work Unit (SKAI) of Subsidiaries to provide recommendations that can add value to the enhancement of risk management effectiveness, internal controls, and the overall quality of governance processes.

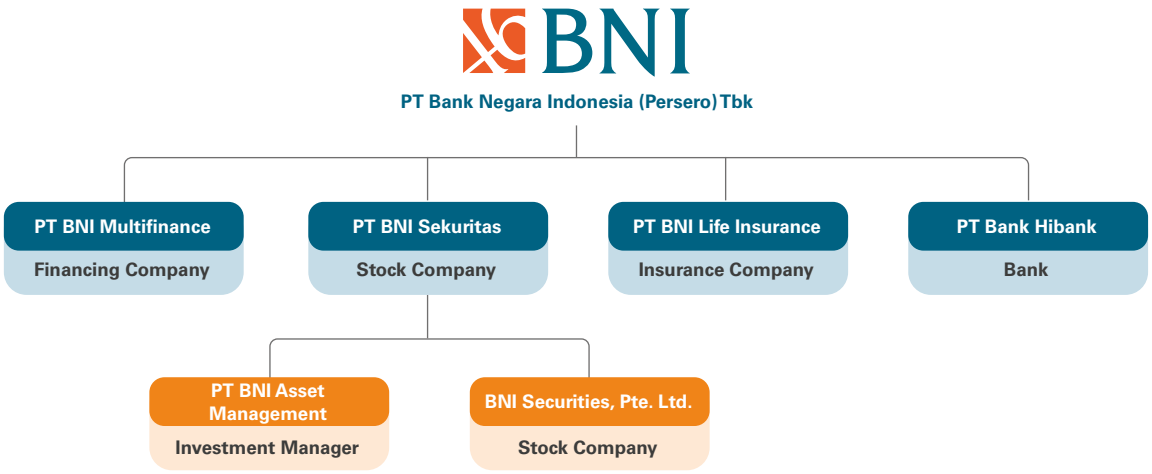
To support BNI's goal of becoming a leading financial institution in service and performance, in alignment with BNI's Corporate Plan, the integrated internal audit activities with Subsidiaries are carried out by the Integrated SKAI in accordance with the provisions of OJK Regulation No. 1/POJK.03/2019 on the Implementation of Internal Audit Functions for Commercial Banks, OJK Regulation No. 18/POJK.03/2014 dated November 18, 2014, and OJK Circular Letter No. 15/SEOJK.03/2015 dated May 25, 2015, regarding the Implementation of Integrated Governance for Financial Conglomerates. In carrying out its duties and responsibilities, the Integrated SKAI within BNI's Financial Conglomerate refers to the Integrated Audit Implementation Procedures and the 2023 Integrated Governance Guidelines for BNI's Financial Conglomerate. These written guidelines serve as the foundation for the Internal Audit of BNI as the EU and the SKAI of the Financial Services Institutions (LJK), members of the BNI Conglomerate, in applying the integrated supervisory and monitoring functions aimed at enhancing the quality of the Integrated Internal Audit Governance.

In its role as the Integrated SKAI, Internal Audit routinely coordinates and communicates with the SKAI of Subsidiaries through joint communication forums, sharing knowledge on audit methodologies, and integrating audit planning, execution, and reporting to support the implementation of Integrated Governance (TKT) for BNI's financial conglomerate. This collaboration includes knowledge sharing on audit methodologies, as well as integration in audit planning, execution, and reporting.

The audits conducted at the Subsidiary level are carried out by the Integrated SKAI using BNI's audit standards. The audit results are then presented in an Integrated Internal Audit Report, which is submitted to the Board of Commissioners, the Director responsible for overseeing the BNI-owned Financial Services Institutions (LJK), and the Director overseeing BNI's Compliance function.

Organizational Structure of the Integrated SKAI in BNI's Financial Conglomerate

The organizational structure of the Integrated SKAI within BNI's Financial Conglomerate as of December 31, 2024, is as follows:



In carrying out its duties, the Integrated SKAI of BNI's Financial Conglomerate may conduct audits on members of the conglomerate, either individually, through joint audits, or based on reports from the SKAI of the conglomerate members. Furthermore, the Integrated SKAI ensures that audit findings and recommendations from the Integrated SKAI, external auditors, results from OJK supervision, and/or the supervision of other authorities have been followed up by the members of the BNI Financial Conglomerate.

Duties and Responsibilities of the Integrated SKAI

The Integrated SKAI has a range of duties and responsibilities, including:

1. Determining the strategy for the internal audit execution of subsidiary companies.
2. Evaluating and formulating the principles of Internal Audit, providing input on the adequacy of methodologies, policies, and audit procedures for the SKAI of the Financial Services Institution (LJK) members of the Financial Conglomerate, in accordance with the size, characteristics, and complexity of the LJK members. This evaluation spans all stages of the audit process, including planning, execution, reporting, and monitoring follow-up actions for resolution and quality control measures.
3. Presenting the key findings of the integrated audit to the Chief Executive Officer (CEO) and the Board of Commissioners of the Parent Entity, with copies sent to the Director overseeing the Compliance Function of the Parent Entity.
4. Monitoring the follow-up actions of internal audit results in an integrated manner and reporting the outcomes to the CEO and the Board of Commissioners of the Parent Entity, with copies sent to the Director overseeing the Compliance Function.
5. Delivering the integrated internal audit report to the CEO, the Director designated to oversee the LJK of the Financial Conglomerate, the Board of Commissioners of the Parent Entity, and the Director responsible for the Compliance Function of the Parent Entity.
6. Monitoring and overseeing the follow-up of recommendations from the Integrated Governance Committee.
7. The Parent Entity's SKAI, operating under the Three Lines Model, ensures internal controls across all lines within the BNI Financial Conglomerate by conducting audits and consultations for the LJK members of the Conglomerate. The Parent Entity's SKAI can audit and consult with the LJK members without needing approval from the Board of Commissioners of the respective LJK.
8. The Parent Entity's SKAI conducts internal supervision over all operational and business areas, coordinating with the internal audit functions of the LJK members of the Conglomerate, as outlined in the internal audit charter.
9. Promoting synergy in the development of auditors for the SKAI of the LJK members of the Financial Conglomerate, in collaboration with BNI's SKAI, as outlined in the Memorandum of Understanding (MoU) for Integrated Audit Quality Development for BNI's Financial Conglomerate.

In addition to these primary duties, the Integrated SKAI also conducts periodic reviews of the Integrated Governance Guidelines and evaluates the Structure, Processes, and Outcomes of Integrated Governance every semester to assess the Governance Structure, Governance Process, and Governance Outcome of the Integrated Audit Unit.

Scope of Integrated Internal Audit

The scope of integrated internal audits encompasses the entire business group within BNI's Financial Conglomerate. This audit involves all aspects and activities of the LJK members of the Financial Conglomerate, both directly and indirectly. The audit process adheres to applicable regulations and considers the size, characteristics, and complexity of each LJK within the conglomerate. To fulfill these responsibilities, including the development of audit quality, Internal Audit (IAD) and the SKAI of the Subsidiaries integrate their internal audit functions, covering the following areas:

A. Integrated Audit Methodology
   IAD and the SKAI of the Subsidiaries align and evaluate the methodologies, policies, and procedures of each subsidiary's internal audit. This alignment process includes the following steps:
   a. IAD coordinates the alignment of the risk-based audit methodology used by the SKAI of the LJK Subsidiaries.
   b. IAD provides input on the adequacy of the subsidiaries' audit policies and SOPs.

B. Integrated Audit Planning
   IAD and the SKAI of the Subsidiaries prepare the Annual Integrated Audit Plan with the following mechanisms:
   a. IAD provides input on the annual audit plan prepared by the SKAI of the Subsidiaries, based on the defined audit focus.
   b. Information from the SKAI of the Subsidiaries' audit results is used by IAD for evaluation when drafting the integrated audit plan.
   c. IAD consolidates the integrated annual audit plan and submits it to the CEO and Board of Commissioners of the Parent Entity.

C. Integrated Audit Execution
   The integrated audit is conducted through the following mechanisms:
   a. Individual audits carried out by IAD.
   b. Joint audits.

D. Development of Integrated Auditor Competence
   IAD and the SKAI of the Subsidiaries collaborate on auditor development, which may include the following mechanisms:
   a. IAD involves the SKAI of the Subsidiaries in joint training sessions, such as the Refreshing Auditor program.
   b. IAD and the SKAI of the Subsidiaries offer internship opportunities for auditors within the Subsidiaries or at IAD BNI.

E. Integrated Audit Reporting
   1. The SKAI of the Subsidiaries submits quarterly internal audit reports to IAD BNI through the integrated internal audit communication forum. These reports must include at least the following information:
      a. The Annual and Periodic Audit Plans of the Subsidiaries' SKAI.
      b. The implementation of audits by the SKAI of the Subsidiaries.
      c. Key findings from the audits conducted by the SKAI of the Subsidiaries and external audits within the Subsidiaries.
      d. Follow-up actions on the audit findings of the SKAI of the Subsidiaries, IAD BNI, and external audits.
      e. The Internal Audit Maturity Profile of the Subsidiaries.
   2. IAD submits the Integrated Internal Audit Report, which includes information on the key findings of the integrated internal audit and the follow-up actions on the integrated audit results. The reporting schedule is as follows:
      a. The report is submitted to the Director designated to oversee the Subsidiaries within the Financial Conglomerate and the Director overseeing the Compliance Function at the Parent Entity on a quarterly basis.
      b. The report is submitted to the Board of Commissioners of the Parent Entity every semester.

Implementation of Integrated Audit Activities in 2024

Throughout 2024, the Integrated SKAI has conducted monitoring and reporting of the execution of integrated internal audits, which were periodically reported to the Compliance Director and the Board of Commissioners of the Parent Entity (EU). In this regard, BNI's Internal Audit, in collaboration with the SKAI of the Subsidiaries, has undertaken various efforts to ensure the implementation of integrated internal audits aligns with OJK expectations. These efforts include the following initiatives:

1. Conducting Work Meetings with the SKAI of the Subsidiaries and the Subsidiaries Management Division, with the agenda focusing on:
   a. Aligning the execution of the 2024 Audit Work Plans between the Parent Entity and the Subsidiaries.
   b. Implementing a combined assurance mechanism within the Subsidiaries.
   c. Developing the Audit Management System within the Subsidiaries
2. Holding Quarterly Communication Forums for the Integrated Audit Unit, consistently conducted each quarter, including: First Quarter in April 2024, Second Quarter in July 2024., Third Quarter in October 2024, Fourth Quarter in January 2025. These forums discuss the following:
   a. Realization of the Subsidiaries' SKAI Audit Work Plan.
   b. The 2025 Audit Plan for the SKAI of the Subsidiaries.
   c. Key Results of the Subsidiaries' SKAI Audit.
   d. Progress on Follow-up Actions from the Subsidiaries' SKAI Audit, IAD, and External Audits (such as BPK, BI, OJK, etc.).
3. Developing the Methodology for Internal Control System (SPI) Assessment for the Subsidiaries, tailored to the relevance of each Subsidiary's organization.
4. Updating the Implementation Guidelines for the Internal Control System (SPI) within the Subsidiaries, including updates or additions of sub-parameters and updated scoring within the sub-parameters.
5. Conducting Self-Assessment Evaluations of the Internal Control System (SPI) for each Subsidiary every semester.
6. Monitoring the Maturity Profile of the SKAI of the Subsidiaries, which includes assessing organizational structure, the fulfillment of auditor positions and their capabilities (certifications/ training), the completeness of enabling outputs, and the development plans for the Subsidiaries' SKAI.
7. Discussing Follow-up Actions on Recommendations and Advice from the BNI Board of Commissioners concerning the Subsidiaries.
8. Conducting Joint Audits with BNI Securities' SKAI, focusing on business performance, business activities, and procurement.
9. Sharing Audit Programs with BNI Finance, covering activities related to Anti-Money Laundering (APU PPT & PPPSPM) and accounting activities.
10. Organizing Training for all auditors in the Parent Entity and Subsidiary SKAIs, covering topics such as Communication Skills and Information & Technology Audits (including System Development Life Cycle and Cybersecurity). Additional training was also provided on BNI's projects and applications, including Retail Credit Tools, Project Management, and Retail Products.

Compliance Function

The increasing challenges and risk exposures faced by the national financial services sector require BNI to continue to adapt to changes and developments in information technology that occur while ensuring the conformity of daily operational implementation to the principles of good governance and applicable laws and regulations. For this reason, BNI established the Compliance Function as a special work unit responsible for establishing an internalized and organized compliance culture. In addition, BNI, as the Main Entity in the BNI Financial Conglomerate and in order to implement Integrated Governance for the Financial Conglomerate has also added an Integrated Compliance Function to the structure of the BNI Financial Conglomerate.

In the Bank's daily operations, the BNI Compliance Function carries out preventive (ex-ante) efforts to prevent or minimize compliance risks in business activities, in addition to ensuring that policies, provisions, systems and procedures, as well as business activities carried out by the Bank are in accordance with OJK provisions and statutory regulations and comply with applicable banking rules. By optimizing the role of the Compliance Function, BNI can realize one of the main objectives in the company's sixth mission, namely "To be a reference for the implementation of Compliance and Good Corporate Governance for the Industry."

Legal Basis for the Compliance Function

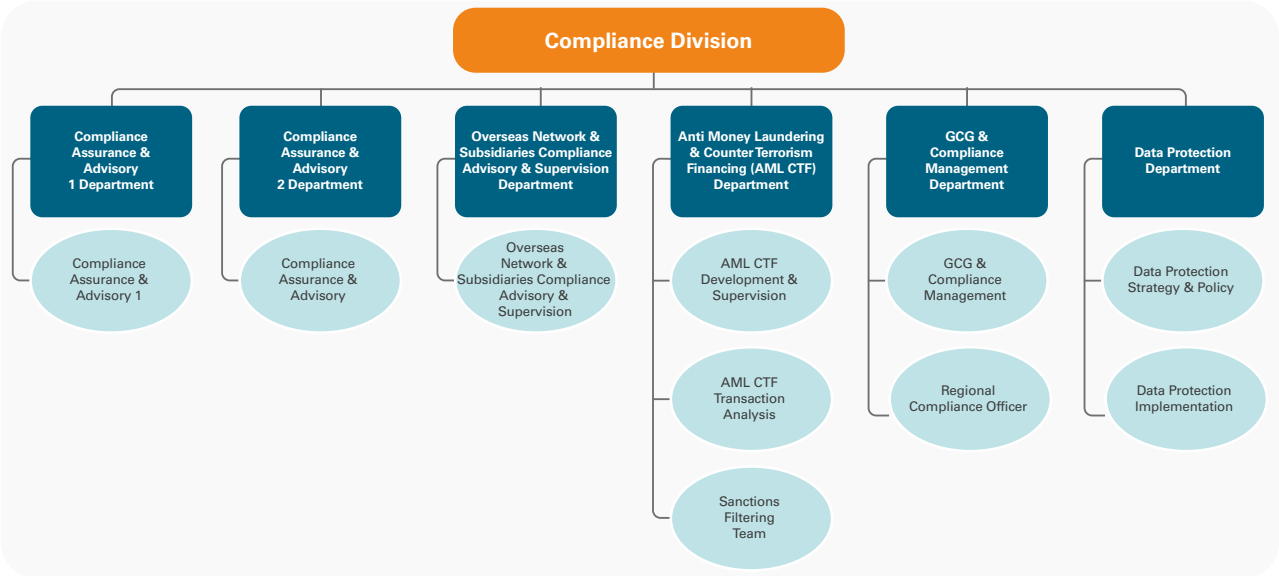
The implementation of BNI's Compliance Function is guided by relevant regulations, including:

1. OJK Regulation No. 46/POJK.03/2017 concerning the Implementation of Compliance Functions for Commercial Bank;
2. OJK Regulation No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates.
3. OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks.

Organizational Structure of the Compliance Work Unit

BNI has a Director who oversees the Compliance Function and formed a Compliance Division to implement the compliance function.The Compliance Director is responsible for formulating compliance policies and strategies. The Compliance Division, as the spearhead of implementation, ensures that all business units and support functions at BNI carry out their activities in accordance with applicable regulations. Apart from this, the BNI Board of Commissioners is also involved in carrying out active supervision of the Bank's compliance implementation.

The organizational structure of the Compliance Work Unit is in accordance with the Board of Directors' Decree No. KP/369/DIR/R dated August 23, 2024, and is described in the following chart:



Head of Compliance Work Unit Profile



Ikhsan Azman
Compliance Division Head

Age
55 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor's degree in Economics and Accountancy, Economic Faculty majoring in Accountcy, Faculty from Universitas Andalas (1993)
- Master's degree in Magister Management Agribusiness from Institut Pertanian Bogor (2004)

Legal Basis of Appointment
Appointed as Compliance Division Head based on the Board of Commissioners Decree No. KP/595/DIR/R dated July 14, 2023.

Term of Office
July 20, 2023-present

Professional Certification and/or Training
- Risk Management Certification
- Data Protection Officer Certification

Work Experience
- Compliance Division Head (2023-present).
- Vice President in Internal Audit Unit (2018-2022) and Divisi di Policy Governance Division Head (2022-2023)

Concurrent Position
Does not hold concurrent positions at BNI and other companies/ institutions.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders

Mechanism for Appointment and Dismissal of Compliance Work Unit Leaders

The Head of the BNI Compliance Division is appointed and dismissed based on the decision of the Board of Directors by observing the following criteria and conditions:

1. Meet the independence requirements;
2. Master the banking provisions and applicable laws and regulations;
3. Not carrying out other duties outside the compliance function;
4. Have a high commitment to implementing and developing a compliance culture.

Duties and Responsibilities of the Compliance Work Unit

In general, the duties and responsibilities of the Compliance Division are divided into the following functions:

1. In charge of the Compliance Function;
2. In charge of the Implementation of the APU PPT and PPPSPM Programs;
3. In charge of the Implementation of Good Corporate Governance;
4. In charge of the Integrated Compliance Function;
5. In charge of the Gratification and Anti-Bribery Control; and
6. In charge of the Data Protection Officer (DPO) functions.

Active Supervision of the Board of Commissioners on the Compliance Function

In accordance with POJK No. 46/POJK.03/2017 concerning the Implementation of Compliance Functions for Commercial Banks, BNI's Board of Commissioners has a very important role in active supervision of the implementation of compliance functions. This supervision is carried out periodically and covers various aspects, including:

1. Evaluate the implementation of the Bank's compliance function at least twice a year;
2. Provide suggestions and advice in order to improve the quality of implementation of the Bank's compliance function.

BNI's Board of Commissioners actively supervises and provides suggestions and advice, both directly and through committees under the Commissioner. Supervision and suggestions are conveyed through regular meetings or reports, as follows:

1. Regular meetings between the Board of Commissioners and the Board of Directors in charge of the Compliance function.
2. Regular meetings of Committees under the Board of Commissioners, such as the Audit Committee, Risk Monitoring Committee, and/or Integrated Governance Committee, with the Director in charge of the Compliance function and/or the Compliance Division.
3. Periodic reports submitted include:
   - Corporate Governance Self-Assessment Report;
   - Integrated Governance Self-Assessment Report;
   - Report on the Implementation of Duties of the Director in Charge of the Compliance Function;
   - Integrated Compliance Function Implementation Report;
   - Reports related to the implementation of the Anti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM).

Director in Charge of Compliance Functions

The Director of Human Capital & Compliance at BNI is currently responsible for the compliance function at BNI, held by Mr. Mucharom. The appointment and implementation of the duties of the Director in charge of the compliance function are carried out in accordance with applicable regulations, including provisions regarding the Implementation of the Compliance Function, General Provisions, Fit and Proper Test, as well as regulations regarding the Utilization of Foreign Workers in the banking sector. These provisions regulate several things, including:

1. Must obtain approval from the Financial Services Authority (OJK) before carrying out the duties and functions of its position. Through Financial Services Authority Letter No. SR-3/PB.12/2023 dated January 4, 2023, the Financial Services Authority approved the appointment of Mr. Mucharom as Director of Human Capital & Compliance;
2. Must meet independence requirements, namely not having financial, management, share ownership, and/or familial relationships up to the second degree with members of the Board of Commissioners, the Board of Directors, and/or Controlling Shareholders or relationships with the Bank that could affect their ability to act independently;
3. Must have integrity and adequate knowledge regarding banking provisions and applicable laws and regulations;
4. It is prohibited to employ or utilize foreign workers;
5. Not concurrently serving as President Director and/or Deputy President Director;
6. Does not supervise the functions: operational business and risk management, which make decisions on bank activities, treasury, finance, accounting, logistics, procurement, information technology, and internal audit.

In the current BNI organizational structure, the implementation of the duties of the BNI Human Capital & Compliance Director is supported by the organs below, namely:

1. Compliance Division;
2. Legal Division;
3. Policy Governance Division;
4. Human Capital Strategy Division;
5. Human Capital Services Division;
6. BNI University;
7. Human Capital Business Partner.

Duties and Responsibilities of the Director in Charge of the Compliance Function

The following is a description of the duties and responsibilities of the Director of Human Capital & Compliance specifically regarding the implementation of the Bank's compliance function in general:

1. Formulate strategies to encourage the creation of a culture of Bank compliance;
2. Propose a compliance policy or compliance principles that will be determined by the Board of Directors;
3. Establish compliance systems and procedures that will be used to develop Bank internal regulations and guidelines;
4. Ensure that all policies, provisions, systems, and procedures, as well as business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations;
5. Minimize Bank Compliance Risk;
6. Take preventive measures so that policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority, BI, and applicable laws and regulations;
7. Carrying out other tasks related to the Compliance Function, such as monitoring and maintaining the Bank's compliance with commitments made by the Bank to the Financial Services Authority, BI, and other competent supervisory authorities;
8. In addition to the duties and responsibilities above, in the context of implementing the integrated compliance function, the Director in charge of the compliance function has the task of directing, monitoring, and evaluating the implementation of the Integrated Compliance function as well as following up on suggestions and advice from the Board of Commissioners of the Main Entity or the Integrated Governance Committee in order to improve the Integrated Compliance Function.

COMPLIANCE WORK UNIT

The work unit that carries out the Compliance Function within BNI is carried out by the Compliance Division. This division is an independent work unit and is directly responsible to the Director who is in charge of the compliance function. Apart from that, the Compliance Division has also been designated as an Integrated Compliance Work Unit, a Special Work Unit for the implementation of APU PPT and PPPSPM, as well as a Data Protection Officer (DPO).

Integrated Compliance Work Unit (SKKT)

As an Integrated Compliance Work Unit (SKKT) in the BNI Financial Conglomerate, the Compliance Division is tasked with monitoring and evaluating the implementation of compliance functions in Subsidiary Companies in accordance with the provisions of POJK No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates. The BNI Financial Conglomerate's Integrated Governance Guidelines have determined the division of monitoring and evaluation tasks carried out by SKKT, including:

1. Realizing the implementation of a culture of compliance at all levels of the organization in each Subsidiary Company;
2. Manage compliance risks faced by each Subsidiary Company;
3. Ensure that policies, provisions, systems, and procedures, as well as business activities carried out by each Subsidiary Company are in accordance with regulatory provisions (including OJK, Bank Indonesia, Ministry of Finance, etc.) and applicable laws and regulations, including sharia principles for Subsidiary Companies that implement sharia principles.
4. Ensure compliance of each Subsidiary Company with the commitments made by the Subsidiary Company to OJK, Bank Indonesia, and/or other competent supervisory authorities; and
5. Ensure the implementation of compliance functions and the implementation of applicable APU PPT and PPPSPM in each Subsidiary Company.

Data Protection Officer (DPO)

In connection with the issuance of Law No. 27 of 2022 concerning Personal Data Protection (UU PDP), BNI established a Data Protection Department (DPO) in the Compliance Division to implement the Personal Data Protection function. The Data Protection Officer's duties include providing advice, monitoring, and ensuring compliance with the PDP Law, as well as serving as a contact person regarding the processing of personal data.

As a form of implementation of duties as a Data Protection Officer, it carries out the following main functions:

1. Prepare, develop, and implement strategies, governance, policies, and procedures for personal data protection at BNI in accordance with applicable regulations.
2. Develop an awareness program on personal data protection for all lines of the BNI organization.
3. Provide advisory and consultation regarding the implementation of personal data protection.
4. Manage the results of recording personal data processing activities and provide assistance in carrying out activities related to implementing personal data protection, preparing Record of Processing Activities (ROPA), Data Protection Impact Assessment (DPIA), consent management, etc.
5. Act as coordinator for handling incidents of personal data protection violations.
6. Act as a liaison to the regulator.
7. Carry out monitoring and evaluation, including ensuring that follow-up actions are carried out on audit results in order to improve the implementation of personal data protection.

Training and Competency Development for Compliance Work Unit Leaders in 2024

In 2024, BNI SKK Leaders have participated in a series of educational or training activities to support their competence in monitoring and evaluating the Bank's compliance with applicable standards and regulations:

Type of Training and Competency Development/Training Materials	Date of Implementation	Organizer
Leaders Talk Series "Optimizing Organizational Transformation Through Strategic Delegation"	January 18, 2024	BNI
Leaders Talk Series "Leadership Development and Organizational Resilience in The Transforming Industry"	January 25, 2024	BNI
Leaders Talk Series "Agile & Digital Mindset Experience – Transforming Market & Fostering Collaboration"	January 30, 2024	BNI
Executive sharing session prinsip kehati-hatian tindak pidana korupsi	February 22, 2024	BNI
Risk Management Refreshment	March 4, 2024	BNI and BNSP
Leaders Talk Series "Fostering a Global Mindset Toward Future Business Ecosystem"	March 6, 2024	BNI
PDP Law Webinar Series "Data Privacy and Data Protection Awareness"	May 21, 2024	BNI
PDP Socialization Series 2 "Data Privacy and Data Protection Awareness"	August 12, 2024	BNI
General Assessment Center for C-1 and C-2 Employees in 2024	August 23, 2024	BNI
PDP Socialization Series 3 "Data Privacy Awareness and Data Protection	September 23, 2024	BNI
Certification of Personal Data Protection	November 19, 2024	Asosiasi Profesional Privasi Data Indonesia (APPDI)

Composition of Human Resources and Professional Certifications in the Compliance Unit

In 2024, the number of employees in BNI's Compliance Unit (SKK) totaled 83 (eighty-three) personnel, including the Head of the Compliance Unit. SKK employees have obtained certifications in Compliance, Risk Management, and Governance, Risk & Compliance (GRC), as outlined below:

Certification Type	Number of Human Resources
Risk Management Certification	65 persons
Compliance Certification	78 persons
Governance, Risk & Compliance (GRC) Certification	2 persons
Data Protection Officer Certification	2 persons

Training and Competency Development of the Compliance Unit in 2024

The Compliance Division is committed to continuously enhancing the competency and capability of each employee in the field of Compliance. In 2024, various competency development programs have been designed for Compliance Division employees, with the implementation details outlined in the following table:

Competency Development Material	Implementation Date	Organizer
Webinar Loyalty Payroll BNI MMSGI "Financial Planning Where Saleries Meet Smart Investments"	January 15, 2024	BNI
Firstline Manager Leadership Program (FMLP) Training Batch 5	January 15-17, 2024	BNI
Quality Data Training	January 20, 2024	BNI
e-Bupot Tax Training	February 20, 2024	BNI
PPh Article 21 Reporting Training	February 20, 2024	BNI
Middle Manager Leadership Program (MMLP) Training	February 21-23, 2024	BNI
Firstline Manager Leadership Program (FMLP) Training Batch 5	February 21-23, 2024	BNI
Webinar "Economic and Financial Outlook in 2024"	February 22, 2024	OJK
Webinar "Strategy to Prevent Cyber Attacks"	February 29, 2024	OJK
Webinar Knowledge Supplement IT System Life Cycle Development (SDLC)	March 13, 2024	BNI
Webinar Knowledge Supplement Global Series #1 "Introduction to Global Culture and Its Impact on Business"	March 14, 2024	BNI
Attendance & Evaluation of Webinar "Opportunities & Challenges of Digital Assets in Indonesia"	March 14, 2024	OJK
Presentation & Communication Skill Training	March 18-21, 2024	BNI
Webinar on Implementation of Personal Data Protection Law (PDP)	April 03, 2024	BNI
OJK Institute Webinar with the theme "Paylater, Financial Solution or New Problem?"	April 09, 2024	OJK
Webinar Digital Trend & Skill Series 2: "Building Digital Bridges: Integrating Technology in Modern Services"	April 18, 2024	BNI
Webinar Global Mindset Series 2: "Building Collaborative Teams and Customer/Client Relationships"	April 23, 2024	BNI
OJK Institute Webinar "Opportunities and Challenges of Open Finance in Indonesia"	April 25, 2024	OJK
Webinar Driving Innovation - Beyond Boundaries for Everyday Improvement	April 29, 2024	BNI
Webinar Xpora Series 2024: Global Expansion: Effective Delivery Strategy for MSMEs	April 29, 2024	BNI
Webinar "Optimizing the Role of the Financial Industry to Prevent Green Financial Crime and Other Predicate Crimes"	April 29, 2024	BNI
Webinar with material Mastering Territory Management in Retail Business: Strategies and Insights from Industry Experts	May 07, 2024	BNI
FORDIGI BUMN: sharing session on PDP Law with the theme "What Next to Do to Implement PDP Law for BUMN"	May 14, 2024	KBUMN
OJK Institute Webinar with the theme "How to Prevent Greenwashing in Sustainable Finance"	May 16, 2024	OJK
PDP Law Webinar Series - Data Privacy and Data Protection Awareness	May 21, 2024	BNI
Webinar Leaders Talk Series: Empowering Teams Through Change – Navigating Change with Risk Awareness and Business Acumen	May 21, 2024	BNI
Webinar Leaders Talk Series: Optimizing Organizational Transfromation Through Strategic Delegation	May 22, 2024	BNI
OJK Institute Webinar with the theme "Credit Growth Opportunities After the End of Credit Restructuring Policy"	May 22, 2024	OJK
Webinar Leadership Development and Organizational Resilence in The Transforming Industry	May 28, 2024	BNI
OJK Institute Webinar with the theme "Opportunities and Challenges of Personal Data Protection in the Digital Era"	May 30, 2024	OJK
PDP Series 1 Socialization "Data Privacy and Data Protection Awareness Training"	June 03, 2024	BNI
Webinar with the theme "Banking Industry Readiness in Implementing Law No. 27 of 2022 Concerning Personal Data Protection"	June 05, 2024	BNI

Competency Development Material	Implementation Date	Organizer
Webinar GRC Strengthening Forum OJK Collaboration with Ministries, Institutions and Associations with the theme "Dissemination of the Latest Internal Audit Standards"	June 07, 2024	OJK
Mandatory Webinar RACE Talk Series: Creating Impactful Innovation through Culture Transformation	June 12, 2024	BNI
Senior Management Certification Regime (SMCR) Training	June 19, 2024	Dentons London
Public-Private Roundtable Meeting on Financial Crime Risk Management in The Digital Age and Financial Crimes Enforcement Network (FinCEN) overview	June 26, 2024	JPMorgan Indonesia
Implementation of Final Presentation Action Learning Project (ALP) - Data Driven Analytics Bootcamp Training	July 09-11, 2024	BNI
Commercial Credit Brevet (CAP) Training	August - September 2024	BNI
Socialization of "Implementing Business Judgement Rule in Risk Management"	September 04, 2024	BNI
Capacity Strengthening (Kupas) PAKSI-API with the theme "Empowering the Role of PAKSI-API in Building a Culture of Integrity: Rejecting Illegal Gratification"	September 12, 2024	KPK
Socialization of "Personal Data Protection (PDP) series 3 – Data Privacy and Data Protection Awareness"	September 23, 2024	BNI
Socialization of RoPA (Record of Processing Activities)	September 26, 2024	BNI
Training related to Strategic Approaches to Combat Financial Crime in Indonesia	September 26, 2024	BNI
Anti-Bribery and Anti-Corruption Strategy	October 01, 2024	BNI
Socialization of SkillUp! Program (Learn Soft Skills and Hard Skills) & BUMN Learning Festival Program	October 02, 2024	BNI
Future Generation of Credit Retail Experience	October 04, 2024	BNI
TFT (Training For Trainers) training related to Enhancement Data Quality 2024	October 08, 2024	BNI
Empowering Leadership: How Women Leaders Drive Company Performance	October 10, 2024	OJK
Decision Making and Confidence in The Digital Age	October 16, 2024	BNI
Carbon Trading and Its Effect on Indonesia's Economy	October 17, 2024	OJK
TFT (Training For Trainers) UU PDP Champion Training	October and December 2024	Deloitte
PDP Training related to the preparation of DPIA	October 18, 2024	Deloitte
Synergy of Financial Sector Professions: Sustainable Transformation Towards a Stable, Inclusive, and Innovative Financial Sector Ecosystem	October 31, 2024	Kemenkeu
EV Insurance, International Best Practices for Innovation of New Energy Products and Services	October 31, 2024	OJK
Transformation and Integration of Indonesian Logistics System	November 01, 2024	Kemenkeu
Workshop "OJK – South Korea FSS Join Staff Workshop On Combating Financial Fraud"	November 04, 2024	OJK
Governance Transformation Pillar of Integrity Support	November 05, 2024	OJK
Book Review "Bank Cyber Security"	November 07, 2024	OJK
Strengthening Financial Integrity: Advanced Strategies and Innovations in Anti-Fraud	November 18, 2024	OJK
Strengthening the GRC Ecosystem in the Financial Sector to Support the Golden Indonesia 2045 Vision	November 21, 2024	OJK
Socialization of "Development of Information System for Anti-Money Laundering and Prevention of Terrorism Funding Program (SIGAP) in 2024"	December 04, 2024	OJK
Training Communication Selling Negotiation Skill How to Achieve Target	December 14, 2024	BNI

The Compliance Division also conducts internal sharing sessions for all employees. The topics covered in these sessions include the following:

Internal Sharing Material	Implementation Date
Prevention of External Fines	January - July 2024
Implementation of RKDK (Special Campaign Fund Account) in the Framework of Monitoring the Opening of Campaign Fund Accounts	January 2024
Bank Secrecy and Official Secrecy	February 21, 2024 March 04, 2024
Obligations of Branches Related to DHN (National Black List) to Avoid Fines from BI	February 28, 2024
Organization of Office Networks	February 28, 2024
Cleansing Data	February 29, 2024 March 13, 2024 April 22, 2024 June 24, 2024
Underlying Foreign Exchange Transactions against Rupiah	February, March, June, July, August, September 2024
BNI Advertising Marketing Communication	April 24, 2024
Current month Tax Reporting Obligations and reminders for payment and collection of VAT 1111 (output)	May 08, 2024
Implementation of the Personal Data Protection Law	May, July, August, September 2024
Deadline for Completeness of WIC Profiles and Solutions If There Are System Constraints	June 10, 2024
Awareness of the Dangers of Online Gambling and Fraudulent Investments	June 11, 2024
Identification and Verification of Conductors and Branch Office Obligations	July 25, 2024
Branch Obligations to Identify and Verify OTR Transactions with Remittance Agency Delivery	July 31, 2024
APU PPT & PPPSPM	January - December 2024
Compliance Awareness	February, September, November 2024
Good Corporate Governance (GCG) and Gratification Control and Anti-Bribery	January – December 2024

Implementation of the 2024 Compliance Work Unit Work Program

Along with the rapid development of information technology, globalization, and financial market integration, the challenges and risk exposures faced are increasingly greater. This requires BNI to continually increase risk mitigation efforts in carrying out increasingly complex operational activities. This mitigation is carried out both preventively (ex-ante) and curatively (ex-post) to protect bank business activities. In accordance with POJK No. 46/POJK.03/2017 concerning the Implementation of Compliance Functions for Commercial Banks, it is necessary to increase the role and function of compliance to ensure compliance with regulations and more effective risk management.

To encourage the creation of a culture of compliance in all organizational units, a number of compliance programs have been designed and implemented. The compliance programs are as follows:

1. Realizing the implementation of a culture of compliance at all levels of the bank's organization and business activities:
   a. Training/Socialization to all employees, which includes material on Compliance Culture, Good Corporate Governance (GCG), Gratification Control and Anti-Bribery through digital and classical media, as well as implementing mandatory e-learning;
   b. Submission of Compliance Reminder (CORE) and implementation of the Daily Exercise Employee Program (DEEP46) with material related to the compliance function on a regular basis;
   c. Implementation of supervision both on-site and off-site related to the implementation of APU PPT and PPPSPM and the implementation of the GRC Forum (Governance, Risk, and Compliance);
   d. Gratification Control in the BNI work environment in collaboration with the Corruption Eradication Commission (KPK);

e. Monitoring regarding the effectiveness of the implementation of Good Corporate Governance and Integrated Governance at BNI;
f. Development of a system application in the form of a Compliance Information Management System (CIMS), which is an information system, database, and monitoring of the results of compliance reviews and implementation of APU PPT and PPPSPM online;
g. Compliance Index (CIX) measurement as a reference for measuring and ensuring that the implementation of the compliance function is running well.

2. Manage compliance risks faced by the Bank. Compliance risk is a risk that arises as a result of banks not complying with and/or not implementing applicable laws and regulations. Several steps taken to minimize Compliance Risk include:
   a. Carrying out periodic identification, monitoring, and socialization regarding the fulfillment of obligations and matters prohibited by regulations as a preventive measure;
   b. Remind organizational units that are in-charge units to fulfill obligations periodically;
   c. Create corrective actions based on the Compliance Risk database;
   d. Including sanctions from regulators/ supervisors, which are one source of compliance risk, into the Compliance Index, as well as making the Compliance Index a Key Performance Indicator (KPI) unit.

3. Ensure that the policies, provisions, systems, procedures and business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority (OJK)/ Bank Indonesia (BI) and applicable laws and regulations.
   As a preventive measure to prevent Compliance Risk and support healthy and sustainable growth, the Compliance Division carries out preventive (ex-ante) efforts through compliance tests. This compliance test aims to ensure that all internal regulations and certain banking activities comply with applicable banking standards. The compliance testing activities include the following:
   a. Test compliance with new or updated draft policies, systems and procedures;
   b. Compliance test/review of existing policies, systems and procedures;
   c. Compliance testing of publishing plans or new product developments;
   d. Compliance checklist for assessing the ability and suitability of prospective Controlling Shareholders, members of the Board of Directors, and/or members of the Board of Commissioners;
   e. Compliance test/Credit Compliance Review (C2R) on the proposed Credit Application Tool (PAK);
   f. Compliance test/Procurement Compliance Review (PCR) on proposed Goods and/or Services Procurement Documents;
   g. Compliance test/review of plans for opening and relocating Bank Offices (Regional Offices, Branch Offices, Sub-Branch Offices and Functional Offices);
   h. Compliance test/review of Branch and Center operational activities.

4. Ensure that BNI complies with the commitments made with the Financial Services Authority (OJK), Bank Indonesia (BI), and other competent supervisory authorities. Monitoring of this commitment is carried out collaboratively with the Internal Audit Unit (IAD) to ensure that all Bank actions and policies are in line with the regulations and agreements set by the supervisory authority.

5. The implementation of compliance tests/ Credit Compliance Review (C2R) carried out by the Compliance Division aims to ensure the effectiveness of implementing compliance controls in all work units. Criteria for implementing C2R include the following aspects:
   a. Provision of new, additional, and restructuring funds with the authority of the Head Office Credit Committee (Corporate, Enterprise, and Commercial Segment) and Division Level Credit Committee (Commercial Segment); or
   b. Review of funding provision, where at least 1 (one) member of the Credit Committee is a Director;
   c. Modifications include, but are not limited to, changes in structure, release of collateral, and changes in conditions where at least 1 (one) member of the Credit Committee is a Director; or
   d. Proposals for providing funds must be consulted with the Board of Commissioners or provision of funds to parties related to the Bank that must obtain approval from the Board of Commissioners.

6. Development of the BNI Anti Money Laundering (AML) system as an implementation of the Financial Services Authority Regulations (POJK) regarding the implementation of the APU PPT and PPPSPM programs. The development of this system includes the creation of a mechanism capable of automatically identifying, analyzing, and monitoring the characteristics of transactions carried out by customers. In addition, this system will also provide effective reports to support the monitoring and supervision of suspicious transactions, thereby reducing risks related to money laundering and terrorism financing.

Compliance Indicators for 2024

In 2024, BNI has established a number of compliance indicators designed to monitor, evaluate, and improve compliance performance. The compliance indicators that will be applied are as follows:

1. Compliance Risk Profile
   Compliance risk profile assessment is carried out in a composite manner, which includes two main aspects: assessment of inherent risk and assessment of the quality of risk management implementation. The results of this assessment illustrate the effectiveness of the risk control system in ensuring compliance. In 2024, in composite terms, BNI's Compliance Risk Profile was at level 2, with the following details:
   a. BNI's Inherent Risk in 2024 was at level 2;
   b. The Quality of Implementation of Risk Management (KPMR) was at level 2.
2. Compliance Index (CIX)
   Compliance Index is an assessment tool used to measure and ensure that the implementation of the compliance function in a unit is running well. In general, the CIX measurement results in 2024 were at the Moderate level.

Implementation of the Integrated Compliance Work Unit Work Program in 2024

In 2024, as a manifestation of the implementation of duties and functions to monitor and evaluate the implementation of compliance functions in each Financial Services Institution (LJK) in the BNI Financial Conglomeration (KK), SKKT BNI has implemented several strategic steps, including:

1. Analyzing the latest external provisions that have a significant impact and have major sanctions for LJKs in the BNI KK and submit them to the relevant LJKs for follow-up.
2. Aligning the internal policies of each LJK in the BNI KK and then provide the necessary input or recommendations while still paying attention to the business field, complexity, needs, size, conditions, and regulations that apply to each LJK in the BNI KK.
3. Aligning the Compliance Risk management mechanism through monthly monitoring of the fulfillment of the Regulatory Business Conduct of each LJK in the BNI KK based on the regulations of each LJK using a Self-Assessment.
4. Implementing the Compliance Index (CIX) for LJKs in BNI's KK as a means of monitoring the implementation of compliance functions at LJKs using parameters in the form of fraud, violation cases, regulatory sanctions and fines, pending findings of external and internal auditors, updating customer data, and Regulatory Business Conduct of each LJK.
5. Analyzing the LJK Compliance Function Implementation Report in the BNI KK periodically.
6. Hold meetings with each LJK in the BNI KK periodically to discuss, among other things, compliance issues as well as follow-up to suggestions and advice from the Board of Commissioners.
7. Make efforts to increase the competency of the compliance unit human resources at LJK within BNI's KK through holding sharing sessions by BNI.
8. Prepare and submit reports on the implementation of duties and responsibilities for supervision and evaluation of the Compliance function at each LJK in the BNI KK periodically to the Director in charge of the Compliance Function, as well as prepare reports on the implementation of integrated compliance duties and responsibilities periodically, which are submitted by the Director in charge of the Compliance Function to the President Director and BNI Board of Commissioners.
9. Synergize with LJK in the BNI KK, including regarding training and learning between BNI and LJK in the BNI KK.

Internal Control System [ACGS D.3.17, D.3.18. D.3.19, D.3.20]

BNI implements an Internal Control System (SPI) as a comprehensive and continuous monitoring mechanism throughout all work units and organizational levels in order to support the achievement of the Bank's objectives and is designed to identify the possibility of an event occurring that could affect the Bank's performance. The implementation of the internal control system within BNI is guided by the Financial Services Authority Circular Letter (SEOJK No. 35/SEOJK.03/2017 concerning Standard Guidelines for Internal Control Systems for Commercial Banks ("SEOJK 35/2017") and the Committee of Sponsoring Organizations of the Treadway Commission's (COSO) Framework. [ACGS D.3.17]

To realize the implementation of healthy, safe, and controlled Bank operational activities, BNI implements an effective SPI so that it can assist the Board of Commissioners and the Board of Directors in safeguarding the Bank's assets, guaranteeing the availability of reliable financial and managerial reporting, increasing the Bank's compliance with applicable laws and regulations, reducing the risk of losses, deviations, and violations of prudential aspects, and ensuring risk management remains within the tolerance limits (risk appetite) set by Management. Implementation of SPI is the responsibility of all parties involved in the Internal Control System, which is outlined in the duties and responsibilities of each party.

BNI, as the Main Entity in the BNI Financial Conglomerate implements an integrated control system together with Subsidiary Companies to ensure that operational activities within the BNI KK are running well and can increase added value for the Bank through effective implementation of risk management and GCG principles.

INTERNAL CONTROL SYSTEM OBJECTIVES

BNI's objectives for implementing an effective internal control system include, among other things, ensuring:

1. Compliance with statutory provisions and regulations (Compliance Objectives) is intended to ensure that all BNI business activities are carried out in accordance with statutory provisions and regulations, both provisions issued by the government, the Financial Services Authority, and internal policies and procedures established by BNI; [ACGS C.2.6]
2. The availability of complete, accurate, appropriate, and timely financial and management information (Information Objectives) is intended to ensure the availability of complete, accurate, appropriate, and timely reports required for appropriate and accountable decision-making;
3. Effectiveness and efficiency in BNI's business activities (Operational Objectives) are intended to increase effectiveness and efficiency in the use of assets and other resources in order to protect BNI from the risk of loss; and
4. Increasing the effectiveness of risk culture in the BNI organization as a whole (Risk Culture Objective) is intended to identify weaknesses and assess deviations early and reassess the reasonableness of existing policies and procedures at BNI on an ongoing basis.

ACTIVE CONTROL AND SUPERVISION MECHANISM BY THE BANK'S MAIN ORGANS

BNI applies the Three Lines Model framework in an internal control system that is integrated with risk management to support the creation of reliable governance. The application of the three lines model principle encourages the involvement of all levels of the organization, starting from the work unit level to the Board of Commissioners and the Board of Directors level, as the main organs in BNI governance to play an active role in carrying out supervision and establishing a culture of control at the Bank.

By using the Three Lines Model approach, first-line roles/risk-taking units are responsible for the risks taken, execution, and results (day-to-day risk management & control). Second-line roles/risk control units are responsible for preparing the Bank's risk management framework, policies, principles, and methodology. Meanwhile, third-line roles/risk assurance units are responsible for independently assessing the effectiveness of risk management implementation.

The active supervisory involvement of the Board of Commissioners and the Board of Directors is also very necessary to ensure that the Bank's internal control system and implementation of risk management are running well and in accordance with applicable regulations. The Board of Directors is tasked with monitoring the adequacy and effectiveness of the internal control system by ensuring that internal implementation function activities have been carried out by all employees. Meanwhile, the Board of Commissioners ensures that the Board of Directors has monitored the effectiveness of the implementation of the internal control system by holding regular meetings with the Board of Directors and Executive Officers to discuss the effectiveness of SPI.

CONFORMITY OF BNI'S SPI WITH THE COSO FRAMEWORK [ACGS D.3.17]

In order to implement effective SPI both for BNI individually and consolidated and integrated with Subsidiaries, BNI implements an internal control system consisting of 5 (five) main components in line with the Internal Control Integrated Framework developed by The Committee of Sponsoring Organization of the Treadway Commission (COSO), including:

1. Control Environment
2. Risk Assessment
3. Control Activities
4. Information and Communication
5. Monitoring Activities

Throughout 2024, the suitability of the implementation of the internal control system with the COSO Internal Control Integrated Framework is explained as follows:

Components of Internal Control in accordance with COSO Framework	Implementation of BNI Internal Control System
1. **Control Environment** The commitment, behavior and steps taken by BNI's Board of Directors and Board of Commissioners have formed a solid control environment. This environment, in turn, becomes the basis for the implementation of effective operational control activities across all lines of management.	The main elements that make up BNI's control environment are: 1. Adequate organizational structure; 2. BNI leadership style and management philosophy; 3. Integrity and ethical values as well as employee competence; 4. Human resources policies and procedures; 5. Attention and direction from BNI Management and other committees, such as the Risk Management Committee; 6. External factors that influence BNI operations and the implementation of risk management.
2. **Risk Assessment** As an integral part of the internal control system, BNI carries out regular risk assessments. Several types of risks that have been identified are the main focus in this process. By measuring exposure to these risks, BNI can formulate appropriate mitigation strategies so that risks can be managed effectively and optimally.	Assessment of 8 (eight) types of risks that BNI must manage include: 1. **Credit Risk Assessment** Credit Risk Assessment includes, among other things, the following aspects: a. Number, quality, and composition of balance sheet (on-balance sheet) and administrative account (off-balance sheet) exposures; b. Debtor/counterparty credit risk level; c. Characteristics of the credit provided; d. Business and industrial environmental conditions; e. Internal Rating System and Scoring System; f. Credit risk stress testing; g. The use of internal ratings to determine asset quality and reserve size through calculating the Expected Credit Loss (ECL) value, which reflects the estimated potential credit loss through calculating 3 basic parameters, namely Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD). 2. **Market Risk Assessment** Market risk assessments are carried out on the entire trading book and banking book portfolio. Market risk assessment on trading books includes, among other things: a. Market risk sensitivity measurement – standard method; b. Aggregation using Value at Risk (VaR) – internal model; c. Stress Testing market risk; d. Budget loss; and e. Backtesting. Market risk assessment in the banking book includes, among other things: a. Measuring interest rate risk in the banking book; and b. Measuring exchange rate risk in the banking book.

Components of Internal Control in accordance with COSO Framework	Implementation of BNI Internal Control System
	3. Liquidity Risk Assessment Liquidity risk assessments are carried out to measure and monitor net funding needs on an ongoing basis. The liquidity risk assessment process includes: a. Assessment of liquidity ratios, including Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR); b. Maturity profile assessment; c. Cash inflow and outflow projections; d. Stress Testing liquidity risk; e. Availability of liquid assets (Cash), Secondary Reserve (SR); and f. Liquidity Ratio. **4. Operational Risk Assessment** One of the methods used to assess operational risk at BNI is Risk Control Self-Assessment (RCSA), which is carried out periodically through a self-assessment process by work units, which aims to identify potential weaknesses in existing controls so that risks can be mitigated as early as possible. Operational risk assessment is also carried out through assessing the operational risk profile with indicators/parameters: a. Business Characteristics & Complexity b. Human Resources c. Information Technology and Supporting Infrastructure d. Fraud e. External Events **5. Legal Risk Assessment** Legal risk assessment/measurement can use indicators/parameters in the form of: a. Potential losses arising from litigation demands; b. Weakness of engagement; and c. The absence/occurrence of changes to the regulations/legislation underlying the publication of a product or service. **6. Strategic Risk Assessment** Strategic risk assessment/measurement can use indicators/parameters in the form of: a. Suitability of strategy to business environmental conditions; b. High-risk strategies and low-risk strategies; c. BNI's business position relative to competitors; and d. Achievement of the realization of the Bank Business Plan (RBB). **7. Compliance Risk Assessment** Compliance risk assessment/measurement can use indicators/parameters in the form of: a. Type, significance, and frequency of violations of applicable provisions; and b. Violation of certain financial transaction provisions; c. Frequency of violations (BNI compliance track record). **8. Reputational Risk** Assessment/measurement of reputation risk can use indicators/parameters in the form of: a. Influence of the reputation of BNI owners and related companies; b. Violation of business ethics; c. Complexity of BNI products and business collaborations; d. Frequency and materiality of negative Bank news; and e. Frequency and materiality of customer complaints.
3. **Control Activities** Control activities are an important component to ensure the achievement of organizational goals through risk control. These control activities include implementing policies and procedures designed to reduce risks that could hinder the achievement of organizational goals.	To ensure that business risks are managed effectively, BNI has implemented various control activities which include: 1. General Control Activities Involving all employees including the Board of Directors, control activities must be planned and carried out to ensure management directives are implemented. Control activities must be contained in policies and procedures to ensure that each activity is carried out effectively and encourage action to anticipate the risks inherent in each operational activity. 2. Control Activities according to Organizational Functions An effective Internal Control System requires the establishment of a control structure in accordance with the organizational structure, which includes:

Components of Internal Control in accordance with COSO Framework	Implementation of BNI Internal Control System

a. Management Reviews (Top Management Reviews)
The Board of Directors actively requests presentations and performance reports periodically to evaluate BNI's progress towards the targets that have been set. Through this evaluation, the Board of Directors can quickly detect problems such as control weaknesses, financial reporting errors, or fraud. Determination of targets must be in accordance with the risk management policy, which is prepared by considering the level of risk willing to be taken (risk appetite), the maximum level and type of risk determined (risk tolerance), and the determination of limits.
b. Operational Performance Review (Functional Reviews) are carried out by the Internal Audit Unit periodically.
c. Information Systems Control
Includes verification of the accuracy and completeness of transactions as well as authorization, general control, and application control.
d. Control of Physical Assets
Control activities include securing assets and restricting access to computers and data files.
e. Documentation, including adequate documentation of accounting policies, procedures, systems, and standards as well as audit processes.

3. Control Activities according to Risk Type
Control activities have been outlined in policy and procedure documents to identify risks, including market, liquidity, credit, operational, legal, compliance, reputation, and strategic risks.
a. Credit Risk Control
i) Credit supervision covers all aspects of credit and all objects of supervision without exception;
ii) Internal credit control.
b. Market Risk Control
For control purposes, the market risk identification and measurement process are carried out by a unit that is independent of business activities, in this case carried out by the Risk Management Work Unit.
c. Operational Risk Control
BNI has comprehensive policies and procedures for all existing work units and products/activities to ensure operational activities can be carried out appropriately and consistently by the entire organization. BNI also has complete and trained organs to ensure that control activities can be carried out prudently through the application of the principles of segregation of duties, dual control, maker-checker, and other control principles. BNI has a comprehensive process in the process of launching new products/activities so as to ensure that the products/activities launched have an adequate control process foundation for their operationalization. With the development of technology, many control activities have also been automated so that operational risks can be minimized.

Apart from the above, BNI has also implemented Risk Control Self-Assessment activities with a Control Testing approach/method, which is carried out periodically to ensure that the control activities that have been designed have been implemented well and are still adequate over time. BNI has several special work units that are independent from the process owner and will carry out Control Testing so that identification of potential control weaknesses can be carried out more focused and independently. Every potential gap found will be followed up and monitored to ensure operational risks can be minimized.

Through strong governance, BNI ensures that there is an oversight process from the independent Risk Management Work Unit, Internal Audit as the third line, and also monitoring carried out by the Board of Directors and Board of Commissioners through various committees such as the Risk Management Committee, Risk Monitoring Committee, etc. This also ensures that the operational risk control process has been carried out according to what has been determined and potential problems have been handled appropriately.

In addition, to anticipate crisis conditions or natural disasters, BNI has established a Business Continuity Management process that is equipped with the necessary policies, procedures, and organs to ensure that crisis or disaster conditions are handled properly so that business continuity is maintained. The necessary protocols have been built, and trials are carried out periodically to always ensure the readiness of the established plans.

Components of Internal Control in accordance with COSO Framework	Implementation of BNI Internal Control System
	d. Liquidity Risk Control Liquidity risk control is carried out by: i) Monitoring and taking alternative strategic steps for each Secondary Reserve (SR) traffic light, namely: Dark Green, Light Green, Light Yellow, Dark Yellow, and Red; ii) Carrying out funding strategies, managing daily liquidity positions and liquidity risks, managing liquidity positions, and managing intra-group liquidity risks as regulated in the Global Funding Policy, Asset Management Policy, and Asset and Liability Management Policy. e. Legal Risk Control Legal risk control is carried out by ensuring that BNI›s agreements with third parties safeguard BNI›s interests. Legal risk control is carried out by the Work Unit, which functions to manage legal risk, including through: i) Assessment in the form of a juridical study, in the event that there are plans to add/develop new products and/or activities; ii) Providing legal advice and/or legal assistance in terms of legal risks in operational activities; iii) Periodically review contracts and agreements with other parties. f. Strategic Risk Control Strategic risk control is carried out by: i) Carrying out an effective, independent, and objective review of strategic policies as outlined, among others, in the form of a review of the implementation and achievement of performance against targets set in the Bank›s Business Plan through meetings of the Board of Commissioners inviting the Board of Directors (Radekom), Board of Directors Meetings (Radisi), Sector Meetings, and Business Reviews; ii) Adequate testing and review of the management information system. g. Compliance Risk Control Compliance risk control is carried out through preventive (ex-ante) actions aimed at: i) Ensure that policies, provisions, systems, and procedures, as well as business activities at BNI, are in accordance with the provisions of applicable regulators and regulations; ii) Ensure compliance with established commitments. h. Reputation Risk Control Reputation risk control is carried out by: i) Manage, follow up, and resolve customer complaints and lawsuits that may increase reputation risk immediately; and ii) Develop reliable mechanisms for carrying out effective reputation risk control measures.
4. **Information and Communication** Information and communication are critical elements that ensure the flow of relevant and high-quality information across all levels of the organization. Accurate and timely information must be available to stakeholders to support decision making and implementation of control activities. Through an effective information system and open communication channels, the Bank can ensure that risks can be identified and responded to appropriately, as well as facilitate the implementation of integrated controls.	In the Internal Control System, the information system must be able to produce relevant reports related to BNI's operations, financial condition, implementation of risk management, and compliance with applicable regulations. This report functions to support the performance of the Board of Directors and Board of Commissioners in carrying out their duties. The information presented includes: 1. Internal and external information that is needed by management to evaluate the achievement of BNI's goals, as well as 2. Information is accurate and presented in a timely manner so that it can be used effectively and efficiently in making decisions and carrying out responsibilities. The information systems required include: 1. BNI organizes an emergency recovery plan and back-up system to prevent high-risk business failures; 2. BNI owns and maintains a management information system, both in electronic and non-electronic form.

<table>
<tr><th>Components of Internal Control in accordance with COSO Framework</th><th>Implementation of BNI Internal Control System</th></tr>
<tr><td></td><td>To ensure that all employees understand and comply with applicable policies and procedures in carrying out their duties and responsibilities, effective internal communication channels are needed. This communication aims to ensure that each employee can carry out their duties in accordance with established standards. Apart from that, external communication channels are also important to convey the necessary information to shareholders, regulators, customers, and other third parties.

In processing information in electronic form, the system used must be equipped with an adequate audit trail. This audit trail serves as a monitoring and transparency tool, ensuring that every transaction or change can be properly traced to support accountability.</td></tr>
<tr><td>5. Monitoring Activities
Monitoring Activities are components that aim to assess the effectiveness of internal control on an ongoing basis and perform adjustments if necessary. These activities ensure that internal controls remain effective in reducing risks and achieving organizational objectives.</td><td>Monitoring of BNI activities, both in business units and functional units, is carried out using a three-lines model approach. This approach ensures comprehensive and layered risk control. More detailed information about this approach is outlined as follows:
<table>
<tr><th>#1
Risk Taking Unit or First Line Roles</th><th>#2
Risk Control Unit or Second Line Roles</th><th>#3
Risk Assurance or Third Line Roles</th></tr>
<tr><td>The Risk Owner is responsible for the risks undertaken, their execution, and outcomes (day-to-day risk management and control)
1. Responsible for managing and controlling risks inherent in daily business activities or functions.
2. Identifies, measures, mitigates, monitors, and reports risks inherent in business activities/functions in accordance with the strategies, policies, and risk parameters established by the Second Line Roles.</td><td>The Risk Control unit is responsible for developing the framework, policies, principles, and methodologies for the Bank's risk management
1. Prepares proposals for risk management strategies and policies, including risk appetite and limits.
2. Develops the framework, policies, principles, tools, methodologies, and standards for risk management.
3. As a risk oversight unit, conducts risk aggregation and comprehensive reporting.
4. Provides advice or recommendations to First Line Roles in implementing risk policies within their authority.
5. Escalates critical issues or key decisions to Senior Management/ Board of Directors and/or the Risk Management & Anti-Fraud Sub-Committee and/or the Integrated Risk Management Committee.</td><td>The Risk Assurance unit is responsible for independently assessing the effectiveness of risk management implementation and internal control
1. Conducts independent and periodic internal audits on the implementation of risk management and internal control.
2. Develops recommendations for corrective actions and monitors their implementation.
3. Reports audit results to the Audit Committee and key stakeholders within its authority.</td></tr>
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SCOPE OF INTERNAL CONTROL SYSTEMS

The scope of the BNI Internal Control System includes the following:

1. Strategic control, aims to ensure that every strategy or policy determined is in accordance with BNI's goals, vision and mission;
2. Operational control aims to achieve operational efficiency and effectiveness;
3. Reporting control, aims to ensure the quality of any information/reports produced and used in decision making, both internal and external;
4. Compliance control aims to ensure the level of compliance with laws, regulations, and legislation related to operations.

FINANCIAL AND OPERATIONAL CONTROL AND COMPLIANCE WITH LEGISLATION [ACGS: D.3.19]

BNI Financial and Operational Control

The Bank carries out control activities that include establishing control policies and procedures as well as implementing an early verification process to ensure that each policy and procedure is consistently complied with. Control activities are implemented at all functional levels in accordance with BNI's organizational structure.

In its implementation, BNI's internal control covers 2 (two) main areas, namely operational control and financial control, including compliance with applicable laws and regulations. Control over accounting or financial aspects is carried out to ensure that all financial transactions carried out by work units and management are in accordance with statutory provisions and comply with the Bank's internal procedures so as to produce accurate financial reports. Meanwhile, operational control focuses on the efficiency and effectiveness of business processes. Both are complementary and must be carried out in accordance with applicable laws and regulations.

Controlling Compliance with Other Laws and Regulations

To protect BNI from legal risks, the Bank's Compliance Function carries out comprehensive monitoring activities to ensure compliance between the implementation of daily banking operations and policies, provisions, systems and procedures, as well as applicable laws and regulations. In carrying out its duties, the Compliance Function is directly responsible to the Director who oversees the Bank's compliance area.

REVIEW OF THE EFFECTIVENESS OF THE INTERNAL CONTROL SYSTEM [ACGS D.3.18]

Within the framework of BNI's internal control system, the Board of Directors is responsible for ensuring the implementation of the SPI internal control system and is obliged to improve and ensure a risk awareness culture is embedded at every level of the organization. Meanwhile, Internal Audit is responsible for evaluating the adequacy, effectiveness and efficiency of SPI and plays an active role in continuously improving the effectiveness of SPI to achieve the goals set by BNI.

Throughout 2024, BNI Internal Audit has carried out its duties and responsibilities in supporting the effectiveness of the Bank's internal control by conducting periodic reviews and inspections of all activities in Work Units and Subsidiaries. Based on the results of these periodic evaluations, Internal Audit assesses that BNI has implemented SPI in accordance with universally applicable control principles and demonstrated good implementation quality, as well as supporting the achievement of targets set by Management.

Even though the implementation of SPI is deemed adequate, continuous improvement efforts remain a priority that must be carried out continuously by all parties so that the Bank's management continues to run well in accordance with applicable regulations. In this way, BNI can close gaps in fraudulent practices or other bad corporate governance that have the potential to impact material or immaterial

losses for the Bank. The results of the Internal Audit evaluation have been submitted to the Board of Directors for further follow-up by the relevant Work Unit. The Board of Commissioners, especially the Audit Committee, plays an active role in evaluating SPI by reviewing the results of the evaluation carried out by Internal Audit.

STATEMENT OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS ON THE ADEQUACY OF THE INTERNAL CONTROL SYSTEM [ACGS D.3.18, D.3.20]

Based on the results of the review and discussion with Management, Audit Committee, External Auditor, Internal Audit and several Related Divisions, the Board of Directors and Board of Commissioners again stated that BNI has an effective and adequate SPI in managing the risks faced by the Bank during 2024. The Bank succeeded in maintaining its risk management within tolerance limits (risk appetite) to support the achievement of the Bank's objectives as reflected in the Bank's operational activities running effectively and efficiently, submitting accurate and reliable financial reports, safeguarding the Bank's assets, and complying with applicable laws and regulations.

Risk Management System

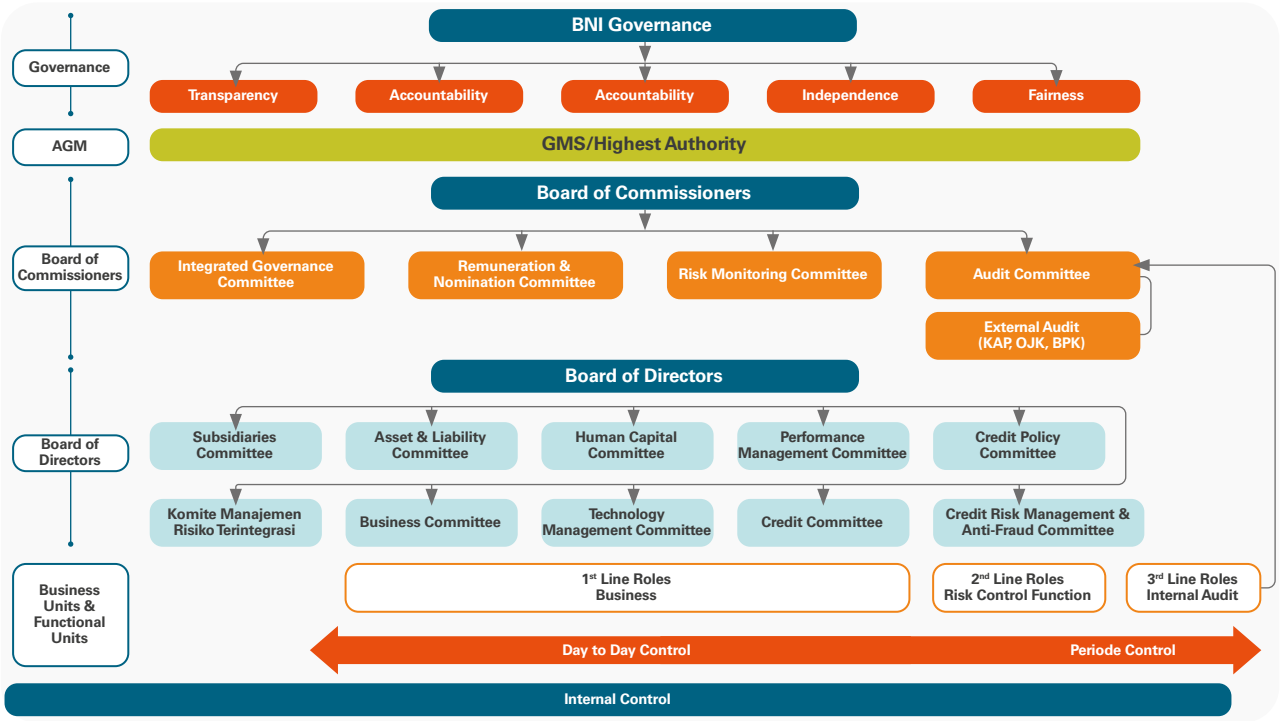
[ACGS D.3.17, D.3.18, D.3.19, D.3.20]

OVERVIEW OF THE RISK MANAGEMENT SYSTEM IMPLEMENTED BY BNI

For BNI, the implementation of risk management is an integral part of complying with regulations and adhering to the principles of prudence in executing business strategies to respond to the rapidly evolving external and internal dynamics of the banking sector. In practicing good corporate governance, especially in risk management, BNI has established a General Risk Management Policy and an Integrated Risk Management Policy that serve as the standard reference for all internal stakeholders of the Bank in managing risks and business opportunities. These policies also guide the Bank in anticipating and managing both current and potential risks, considering changes in the risk profile due to shifts in business strategy, external factors, and regulatory requirements.

BNI employs the Enterprise-Wide Risk Management (EWRM) framework to manage risks individually or in an integrated manner with BNI's Financial Conglomerate (KK) through the alignment of risk appetite with the business strategies of each entity. The proactive and forward-looking implementation of EWRM enables the Bank to enhance its capabilities and coordination in applying a risk-based approach more effectively, thereby achieving healthy and sustainable business growth and delivering optimal returns for shareholders in line with the established risk appetite and risk tolerance.

In simple terms, BNI's risk management framework and governance are illustrated as follows:



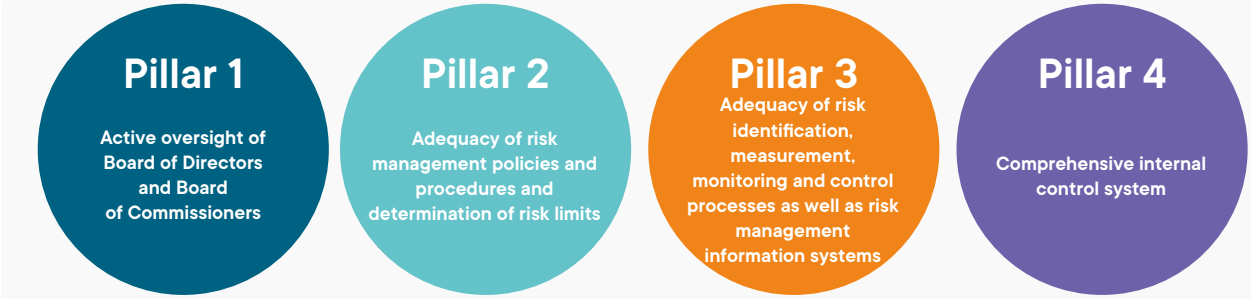
BNI's risk management framework defines risk management framework and processes with interrelationships and reciprocal relationships between the Board of Commissioners and the Board of Directors, the supporting Committees of the two Boards, and Divisions, as well as between the organizational bodies and Subsidiaries. In implementing effective and comprehensive risk management, BNI strives to build a robust risk management infrastructure foundation that covers Governance and Organization (including

human resources), Policies and Procedures, Risk Management Processes, Measurement Tools and Methods (including Risk Model Quantification), and IT backed-methodologies and strong risk culture.

RISK MANAGEMENT FRAMEWORK

As outlined in BNI's General Risk Management Policy and Integrated Risk Management Policy, the risk management framework is based on a risk operating model, covering governance, processes, policies, and the tools and methodologies used. This risk management process is supported by adequate quality and quantity of human resources, sufficient information technology, and the strengthening of risk awareness through the internalization of a risk culture across the entire organization of BNI and its Financial Conglomerate members.

To support the Bank's efforts in achieving healthy and sustainable growth, thereby optimizing shareholder value, BNI consistently strives to mitigate risks and maximize opportunities without disregarding the principles of risk management. For the effective implementation of Risk Management, both for BNI individually and in Consolidation and Integration with Subsidiaries, BNI's Risk Management encompasses 4 (four) main pillars, namely :



PILLAR 1: ACTIVE OVERSIGHT BY THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS

Oversight by the Board of Directors [ACGS D.3.18]

The active oversight by the Board of Directors over BNI's risk management includes the following:

1. Formulating comprehensive written policies, strategies, and frameworks for Risk Management. This includes setting risk limits, both in total and by risk type, taking into account the Risk Appetite (the level of risk the bank is willing to take) and Risk Tolerance, in accordance with the Bank's conditions. Furthermore, the Board of Directors considers the impact of risk on capital adequacy. Once the policies, strategies, and frameworks are approved by the Board of Commissioners, the Board of Directors will implement them.
2. Developing, establishing, and updating procedures and tools for identifying, measuring, monitoring, and controlling risks at BNI.
3. Designing and setting transaction approval mechanisms, including transactions exceeding limit thresholds, and establishing authority levels for each position tier.
4. Evaluating and/or updating the policies, strategies, and frameworks for Risk Management at least once a year, or more frequently if there are significant changes in factors that affect the Bank's business activities, risk exposures, or risk profiles.
5. Establishing a clear organizational structure, including the delegation of authority and responsibilities at each position level related to the application of Risk Management.
6. Being responsible for the implementation of the policies, strategies, and frameworks for Risk Management approved by the Board of Commissioners, and conducting evaluations and providing guidance based on reports from the Risk Management Work Unit (RMWU), including reports on the Risk Profile.
7. Ensuring that all material risks and their impacts have been addressed, and submitting periodic accountability reports to the Board of Commissioners, covering developments and issues related to material risks, as well as corrective actions that have been, are being, or will be taken.
8. Ensuring the implementation of corrective measures on issues or deviations in BNI's business activities identified by the Internal Audit Work Unit (IAWU).
9. Ensuring the adequacy of the quality and quantity of human resources and the improvement of their competence to support BNI's risk management implementation effectively.

10. Developing risk management culture in BNI culture including risk awareness at all levels of the organization.
11. Ensuring that the Risk Management function is implemented independently.

In general, BNI Board of Directors is responsible for implementing good corporate governance, risk management, and integrated compliance that is adjusted to the latest developments in the banking ecosystem and supported by digitalization and technological innovation, in accordance with the provisions stipulated in the BNI Board of Directors Charter stated in the Board of Directors Decree No. KP/339/DIR dated August 6, 2024.

BNI Board of Directors' authorities and responsibilities in integrated risk management include at least:

1. Preparing written and comprehensive Integrated Risk Management policy, taking into account the level of risk appetite and risk tolerance.
2. Implementing the Integrated Risk Management policy that has been set, including:
   a. Ensuring the implementation of Integrated Risk Management in the BNI Financial Conglomerate.
   b. Ensuring that all significant Risks and the impacts caused by the Risks in question have been followed up.
   c. Submitting accountability reports to the Main Entity's the Board of Commissioners periodically.
   d. Communicating the Integrated Risk Management policy effectively to all relevant organizational levels in the BNI Financial Conglomerate so that it is clearly understood.
3. Developing Risk culture as part of the Integrated Risk Management implementation for the BNI Financial Conglomerate.
4. Ensuring that the Integrated Risk Management implementation has been conducted independently.
5. Ensuring the effectiveness of human resource management which includes competence, qualifications, and adequacy of human resources at BNI as the Main Entity to carry out the Integrated Risk Management function.
6. Conducting evaluation of the Integrated Risk Management Work Unit review results on the Integrated Risk Management process periodically to ensure:
   a. The accuracy of risk assessment methodology
   b. The adequacy of risk management information system implementation
   c. The accuracy of risk management policies and procedures and determination of risk limits and thresholds
7. Evaluating and adjusting the Integrated Risk Management policy at least once a year or at any time in the event of changes in factors that significantly affect business activities of the BNI Financial Conglomerate.
8. Understanding the risks inherent in all business activities in the BNI Financial Conglomerate and take the necessary actions according to the BNI Financial Conglomerate Risk profile, including by providing recommendations on proposals related to the implementation of Risk Management to LJK in the BNI Financial Conglomerate.
9. Ensuring the adequacy of infrastructure to manage and ensuring that all risks can be controlled.

In carrying out the above duties and responsibilities, the Board of Directors is assisted by the Risk Management Work Unit (SKMR), which also serves as the Integrated Risk Management Work Unit (SKMRT). Supervision of the Bank's risk management by the Board of Directors is conducted through various forums, including the Board of Directors Meeting (Radisi), Risk Management & Anti Fraud Committee (KRA), Risk Management Sub-Committee (RMC) and Anti Fraud Sub-Committee (KAF) meetings, as well as Credit Policy Committee and Integrated Risk Management Committee (KMRT) meetings.

Supervision by the Board of Commissioners

[ACGS D.3.18]

The Board of Commissioners actively oversees the Bank's risk management activities, including:

1. Approving BNI's risk management policies, including the strategies and frameworks set in accordance with the level of risk to be undertaken (Risk Appetite) and Risk Tolerance, both quantitative and qualitative aspects of Risk Appetite;
2. Evaluating the risk management policies and strategies at least once a year or when there are significant changes in the factors affecting BNI's business activities;
3. Evaluating the accountability of the Board of Directors and providing corrective guidance on the implementation of BNI's risk management policies periodically;
4. Evaluating and decide on the request or proposal of the Board of Directors relating to BNI's transactions or business activities which in accordance with the provisions require the consideration and approval of the Board of Commissioners; and
5. Ensuring that risk management policies and processes are effectively and integrally executed within BNI's overall risk management process.

To carry out the above functions, the Board of Commissioners establishes a Risk Monitoring Committee with the following duties:

1. Evaluating the alignment between risk management policies and their implementation by the Bank;
2. Monitoring and evaluating the tasks of the Risk Management Committee and the Risk Management Work Unit to provide recommendations to the Board of Commissioners;
3. Performing other specific tasks related to the functions and scope of the Risk Monitoring Committee as assigned by the Board of Commissioners.

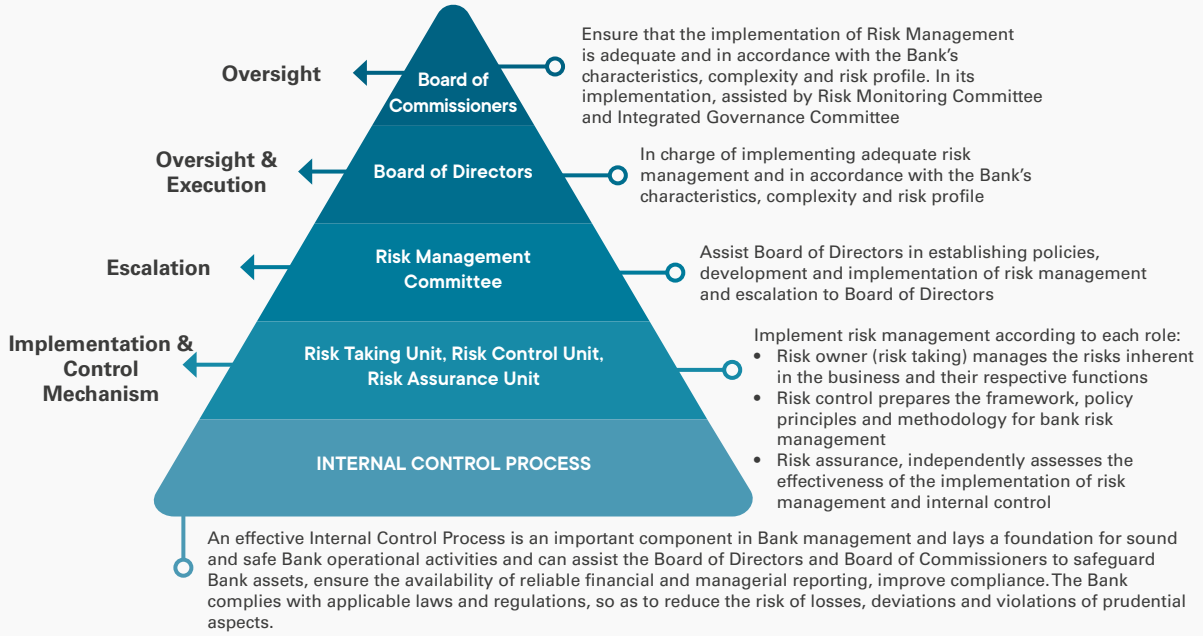
In exercising its active supervision role over the Bank's risk management, both individually and in an integrated manner, BNI's Board of Commissioners is assisted by the Risk Monitoring Committee (RMC), the Audit Committee, and the Integrated Governance Committee. The Board of Commissioners' supervisory functions are carried out through forums such as the Board of Directors and Board of Commissioners meetings (Radekom), as well as meetings of the Risk Monitoring Committee, the Integrated Governance Committee, and the Audit Committee.

In 2024, the agenda for the implementation of the Board of Commissioners' supervisory function carried out through the Board of Directors and Board of Commissioners Meeting (Radekom) forum, as well as in the Risk Monitoring Committee, Integrated Governance Committee and Audit Committee meetings, as follows:

No.	Date	Agenda
1	January 9, 2024	Risk Monitoring Committee Meeting on Leading and Lagging Indicators for Credit, Market, Liquidity, Operational, Legal, Strategic, Compliance, and Reputation Risks
2	January 3, 2024	Submission of Advice and Counsel of the Board of Commissioners on the Implementation of the Risk Monitoring Committee Meeting regarding Leading and Lagging Indicators for Credit, Market, Liquidity, Operational, Legal, Strategic, Compliance, and Reputation Risks.
3	February 06, 2024	Integrated Governance Committee with the agenda of Integrated Risk Profile Evaluation and Integrated Minimum Capital Adequacy (CAR) position December 31, 2023
4	April 4, 2024	Board of Commissioners Meeting on Review of BNI Risk Appetite Statement (RAS) Year 2024
5	April 23, 2024	Board of Commissioners Letter on Evaluation of Threshold Policy for Transaction Authority of SOEs and SOE Subsidiaries
6	July 2, 2024	Risk Monitoring Committee Meeting on the Evaluation of Risks related to Transactions in Treasury, including Market Risk and Liquidity Risk that Take into Account Country Risk and Transfer Risk
7	July 4, 2024	Board of Commissioners Meeting on Review of General Policy of Internal Control System (KUSPI) Year 2024
8	August 06, 2024	Integrated Governance Committee with the agenda of Integrated Risk Profile Evaluation and Integrated Minimum Capital Adequacy (CAR) position June 30, 2024
9	September 5, 2024	Risk Monitoring Committee Meeting and Board of Commissioners' Response regarding 3 (three) Top Risk BNI Quarter II-2024
10	September 24, 2024	Board of Commissioners Meeting on Discussion of BNI Risk Maturity Index (RMI) Assessment Year 2024
11	November 19, 2024	Integrated Governance Committee with the agenda of Evaluating the Integrated Risk Management General Policy and Integrated Capital Policy for 2024
12	November 21, 2024	Board of Commissioners Meeting for Updating the BNI Recovery Plan Document for 2024/2025
13	December 5, 2024	Board of Commissioners Meeting for Reviewing the General Risk Management Policy (KUMR) and Integrated Risk Management and Capital Policy (KUMRT) for 2024
14	December 24, 2024	Risk Monitoring Committee Meeting regarding the Risk Evaluation related to Transactions in Treasury, including Market Risk and Liquidity Risk that Account for Country Risk and Transfer Risk

The Bank's Risk Governance is the foundation for its Risk Management implementation to run effectively. Risk Governance regulates roles and responsibilities, decision-making processes, relationships between risk management functions, as well as the establishment of policies that ensure that risks are managed properly.

BNI Risk Governance



PILLAR 2: ADEQUACY OF RISK MANAGEMENT POLICIES AND PROCEDURES, AND RISK LIMIT DETERMINATION

To support the effective implementation of risk management, BNI has established a risk management policy document, the formulation of which has been aligned with BNI's vision, mission, and strategic plans. This written guideline has been approved by the Board of Commissioners and serves as a strategic and comprehensive reference for all BNI units in managing the risks they face. The following is a list of policies owned by BNI related to the Bank's risk management practices:

1. General Risk Management Policy;
2. General Integrated Risk Management and Integrated Capital Policy; and
3. General Internal Control System Policy.

The formulation of these policies focuses on the identification and control of risks relevant to BNI's business activities and is designed with consideration of the level of risk appetite, risk tolerance, and limit setting. The Policy Document is evaluated and/or updated periodically once a year, or in the event of significant changes that affects BNI's business activities.

Furthermore, the policy document is described in the form of an operational Risk Management Procedure which is used as a reference for implementing risk management for each Risk Management Unit and is adequately documented. Evaluation and/or updating of risk management procedures are conducted periodically, or in the event of changes in the policy document above it.

In order for the management of each type of risk and the mitigation measures taken to be more well aimed, BNI further describes the detailed provisions of each Risk Management Procedure into Technical Instructions which contain detailed procedures for implementation related to specific products and/or activities.

As part of its risk control efforts, BNI establishes risk limits that serve as thresholds to determine the level of intensity for risk mitigation measures to be implemented by Management. The determination of these limits encompasses a variety of thresholds, such as those for specific risks (credit risk, market risk, and liquidity risk), functional activities, and overall limits.

Policies, procedures, and risk limits in BNI's risk management framework are reviewed periodically and approved by the Board of Directors through Committee Meetings or circulation to the Board in accordance with their respective authority levels. As part of its risk measurement and control processes, BNI conducts regular reviews of its Risk Management Policies and Procedures, particularly in response to significant changes affecting the Bank's business activities.

PILLAR 3: ADEQUACY OF RISK IDENTIFICATION, MEASUREMENT, MONITORING, AND CONTROL PROCESSES, AND RISK MANAGEMENT INFORMATION SYSTEM

BNI's Risk Management process encompasses the stages of risk identification, measurement, monitoring, and control for all material risk factors, supported by a Risk Management Information System. Risk identification is conducted proactively, covering all of the Bank's business activities to analyze the sources, likelihood, and potential impact of risks. Subsequently, the Bank measures risks based on the characteristics and complexity of its business activities. To monitor risk measurement outcomes, the Bank has established an independent unit separate from the transaction-executing parties. Additionally, BNI has developed a management information system tailored to the Bank's business characteristics, activities, and complexity.

To enhance the effectiveness of risk management implementation, BNI has established adequate procedures for identifying, measuring, monitoring, and controlling risks, as well as a comprehensive risk management information system.



1. **Risk Identification**
   The process of risk identification is conducted proactively across all business activities to analyze the sources, likelihood, and potential impact of risks on the Bank. Key aspects considered during this process include:
   a. Risk identification is performed periodically.
   b. A structured system is implemented to identify risks across all BNI products and business activities.
   c. Specific risk identification is carried out for new banking products prior to their introduction or implementation.

2. **Risk Measurement**
   Risk measurement assesses the magnitude of risk exposure, serving as the foundation for risk control and the calculation of the Minimum Capital Requirement (KPMM). This process is conducted quantitatively and/or qualitatively, adhering to regulatory methods or internal methodologies developed by BNI when no specific regulatory guidance exists. Stress testing for credit, market, and liquidity risks is also conducted to anticipate extreme conditions. Key considerations include:
   a. The scope of risk measurement should include individual risk sensitivities, trends and factors, as well as overall risk exposure or per risk type. This is done by considering the correlation and all risks inherent in the bank's transactions and products.

b. Both quantitative and qualitative methods are employed, either regulator-mandated or internally developed.
c. Measurement methods comply with applicable regulatory requirements.
d. Internal methodologies for credit, market, liquidity, and operational risks incorporate regulatory requirements, including utilization, backtesting, validation, and documentation.
e. The Risk Management Unit, in coordination with the Risk Management Division, oversees risk measurement.
f. BNI's risk measurement is individually conducted on eight types of risk, while for BNI Financial Conglomeration includes ten types of risk. In reporting the Minimum Capital Adequacy Requirement (CAR) to the regulator, BNI's individual risk measurement focuses on three main risks, namely credit, market and operational risks. Meanwhile, the integrated CAR calculation is performed by comparing the actual total capital of the Financial Services Institutions (FSIs) of the Financial Conglomerate members with the total minimum capital that must be fulfilled by the FSIs of BNI Financial Conglomerate members.

Risk measurement is conducted periodically, with results reported to regulators through the individual Risk Profile and KPMM reports, as well as the Integrated Risk Profile and KPMM reports for the Financial Conglomerate.

3. **Risk Monitoring**
The risk monitoring process ensures effective management by overseeing mitigation efforts and adherence to set limits. Key considerations include:
a. Risk monitoring includes, among others, monitoring of the magnitude of risk exposure, risk tolerance, limit compliance, and stress testing results as well as consistency of implementation of established policies and procedures;
b. Risk monitoring is carried out by both the Operational Work Unit and the Risk Management Work Unit;
c. Monitoring results are presented in reports that are submitted periodically to external parties (Regulators) and internal parties (Management).

Monitoring activities are conducted by Risk monitoring is carried out both by the Operational Work Unit (Risk Taking Unit) as the risk owner (Risk Owner) and by the Risk Control Unit, and the monitoring results are presented in periodic reports, including Bank Health Level Report, Risk Profile Report, Minimum Capital Adequacy Requirement (KPMM) Report, Loan Portfolio Report, Market Risk and Liquidity Risk Monitoring Report, Operational Risk Incident & Loss Report, Business Continuity Management (BCM) Monitoring Report, Internal Risk Analysis and other risk reports.

4. **Risk Control**
BNI prioritizes controlling risks that could disrupt long-term business continuity. Key considerations include:
a. The risk control system refers to established policies and procedures.
b. The risk control process is adjusted to the risk exposure and the level of risk to be taken (risk appetite) and risk tolerance.
c. The hedging and risk mitigation mechanisms are carried out by the Operational Work Unit in collaboration with the Management Work Unit.

BNI's risk control strategies consist of:
a. Risk Acceptance
Specifically for types of risks where intervention for prevention or corrective actions is not feasible, the potential risk will be accepted as a consequence for the Bank in capitalizing on business opportunities, with the consideration that the risk remains within the Bank's limits/tolerance. However, strict controls must be enforced when this risk management strategy is applied.
b. Risk Avoidance
This approach is taken to prevent the Bank from experiencing an unacceptable risk or to prevent the increase of existing risk exposure. Risk avoidance is chosen when the potential benefit of a business activity is smaller than the risk exposure that may arise.

c. **Risk Transfer**
Risks inherent to the Bank's business activities are transferred to other parties, for example, by utilizing insurance services or outsourcing.

d. **Risk Mitigation**
Risk control will be optimal when efforts are made to reduce the existing risks. Risk mitigation aims to minimize losses caused by external factors or internal incidents within the bank. One alternative to mitigate and reduce risks is through the enhancement of controls and the improvement of systems and procedures.

5. **Risk Management Information System**
The Bank develops a Risk Management Information System to support the execution of processes related to risk identification, measurement, monitoring, and control, as well as ensuring the availability of accurate, complete, informative, timely, and reliable information that can be used in the decision-making process by Management. Key considerations related to the implementation of the Risk Management Information System include:

a. **Risk Data Management**
Risk data management involves the management of risk data used to ensure the availability, accuracy, and timeliness of the dissemination of risk management information/reports to relevant stakeholders.

b. **Risk Management Reporting**
Risk management reporting to specific parties must, at a minimum, consider the following aspects:
i) The frequency of reporting should be adjusted to the needs of the stakeholders, ensuring that it provides sufficient information for decision-makers.
ii) The reports should include information on total risk exposure, monitoring of material risks, risk limit setting, compliance with policies and procedures, business performance achievements, and the implementation of risk management.

The effectiveness of BNI's Risk Management Information System implementation includes:
a. The availability of accurate, complete, informative, and timely information that can be used by the Board of Commissioners, the Board of Directors, and relevant units in the application of Risk Management to assess, monitor, and mitigate the risks faced by BNI, both overall and by type of risk.
b. The effectiveness of Risk Management implementation includes policies, procedures, and the establishment of risk limits.
c. The availability of information on the outcomes (realization) of Risk Management implementation compared to the targets set by BNI in accordance with the policies and strategies for applying risk management.

Several risk management applications have been prepared to support the implementation of the risk management processes properly, accurately, and on time, including the Internal Rating System (IRS 2.0), Scoring System, RM Tools, Loan Management System (LMS), Single Integrated Monitoring (SIMON) Framework, Credit Card Behavior and Collection, KUR Behavior and Collection, Central Limit System, Kondor Global Risk (KGR) Market Risk, Risk Control Self Assessment (RCSA) with Process, Risk, Control and Monitoring (PRCM) mechanism, Loss Event Database (LED), Key Risk Indicator (KRI), and Business Continuity Management (BCM). Several Risk Management solutions have been prepared to support the implementation of Risk Management in alignment with the IT Strategic Plan, including:
a. Developing front-end applications for Credit Risk, Market Risk, and Operational Risk;
b.Preparing data storage and information systems. Before implementing the new Risk Management Information System, testing must be conducted to ensure that the processes and outputs generated have undergone effective and accurate development, testing, and re-evaluation.

Before implementing the new risk management information system, BNI conducts testing to ensure that the models, systems, processes, and results have undergone effective and accurate development, testing, and re-evaluation. BNI has utilized various models and tools to support the Risk Management process and business decision-making. To ensure the accuracy and effectiveness of this process, BNI also has an independent validation function under the Risk Management Sector.

In an effort to optimize the validation process, improve the model life cycle efficiency, and reduce the potential emergence of model risks from the implemented models, BNI is developing a framework model called the Risk Management Framework Model to enhance the quality of the

Bank's risk management practices. Model risk is defined as the potential loss that may occur due to errors in the development, implementation, validation, or use of models owned by the Bank. Model risk tends to increase as the number of implemented models grows, the complexity of a model rises, or the impact generated by the implementation of the model becomes more significant.

The Model Risk Management Framework currently being developed includes:

a. Risk Assessment Model
   This is the process of measuring model risk to perform priority assessments and model risk evaluations for model quantification based on materiality and complexity.

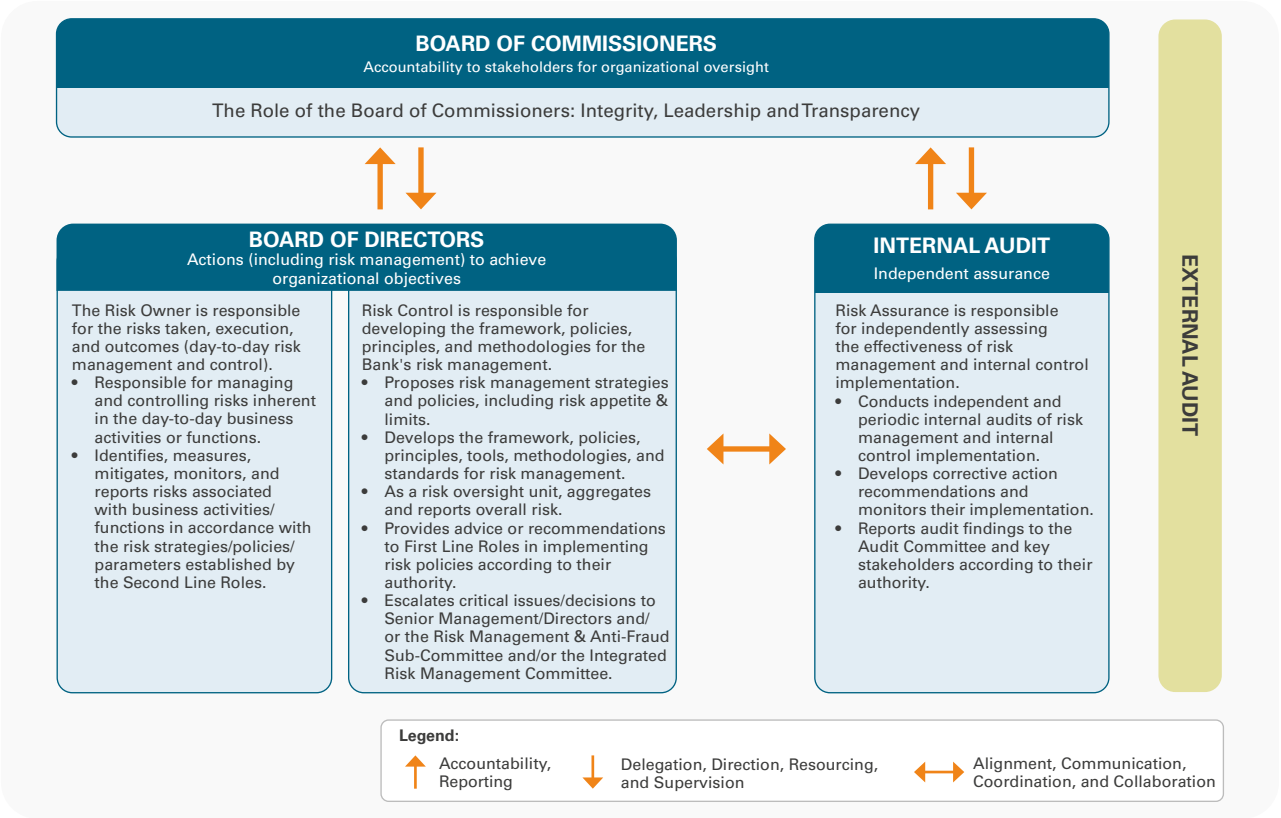
b. Control Model
   This is carried out through validation during the initial stages of model development, as well as periodic validation after the model is implemented. The model validation includes validating the modeling methodology and validating scoring performance.

c. Life Cycle Model
   Through the Life Cycle Model, BNI is able track the position of a model within the Model Risk Management cycle, from the development phase, validation, to implementation. This information includes the implementation status and whether the model has been reviewed periodically.

d. Inventory Model
   The inventory model serves as a catalog of existing models at BNI. The model inventory includes information related to the models, such as the data sources used, the purpose for which the model was developed, model owner/developer, model validation results, and related documentation.

PILLAR 4. COMPREHENSIVE INTERNAL CONTROL SYSTEM

The implementation of the Internal Control System at BNI adopts the Three Lines Model, which is an implementation of the control strategy within the COSO framework, with the following details:



The separation of functions between the Risk Taking Unit, Risk Control Unit, and Risk Assurance Unit implemented by BNI enables the Bank to conduct internal oversight more effectively and efficiently. In the first line of defense (first-line roles), Risk Owners in each work unit act as the Risk Taking Unit, responsible for managing inherent risks associated with their business activities and daily functions. In the second line of defense (second-line roles), the Enterprise Risk Management Division, Operational Risk Management Division, Policy Governance Division, and Compliance Division serve as the Risk Control Unit. Meanwhile, the Internal Audit Unit (SAI), as the third line of defense (third-line roles), functions as the Risk Assurance Unit, reporting directly to the President Director and tasked with independently assessing the compliance of the Bank's risk management processes and internal control systems with established policies, procedures, and regulatory requirements.

TYPES OF RISK PROFILES AND THEIR MANAGEMENT [ACGS: D.3.19]

To achieve a more comprehensive risk assessment, BNI applies integrated risk management in accordance with the provisions of POJK No. 17/ POJK.03/2014, dated November 18, 2014, concerning the Implementation of Integrated Risk Management for Financial Conglomerates, and SE OJK No. 14/ SEOJK.03/2015, dated May 25, 2015. As the Main Entity in the BNI Financial Conglomerate, the Bank manages 10 (ten) key types of risk: credit risk, market risk, liquidity risk, operational risk, legal risk, reputational risk, strategic risk, compliance risk, intra-group transaction risk, and insurance risk.

Further explanations of risk types and management measures are disclosed in the sub-chapter "Types of Risk and Their Management," Chapter 6: Capital and Risk Management Practices, within this 2024 Annual Report.

REVIEW OF RISK MANAGEMENT SYSTEM EFFECTIVENESS [ACGS D.3.17]

BNI periodically evaluates the adequacy of risk identification, measurement, monitoring, and control processes conducted by relevant work units. This assessment encompasses all aspects of risk management, including policies, procedures, and the information systems and technology supporting the Bank's risk management effectiveness.

Based on the 2024 self-assessment, BNI's risk profile rating, both individually and in integration with its subsidiaries, was ""Low to Moderate". These ratings reflect the assessment of inherent risk ratings as "Low to Moderate and the quality of risk management implementation ratings as "Satisfactory".

These results indicate that several of the Bank's risk assessment indicators are at manageable levels and within the Bank's established risk appetite. This demonstrates the Risk Management Unit's strong performance and reflects the effectiveness and consistency of the Bank's risk management system implementation. The "Low to Moderate " integrated risk profile rating achieved by BNI and its subsidiaries underscores the effective and efficient application of risk management processes across all activities.

STATEMENT OF THE BOARD OF DIRECTORS AND/OR BOARD OF COMMISSIONERS ON RISK MANAGEMENT ADEQUACY [ACGS: D.3.18, D.3.20]

BNI conducted an evaluation of its risk management system in 2024, achieving satisfactory results. The Bank's evaluation of the risk management system's effectiveness included regular reviews of risk management policies and procedures, the adequacy of risk management information systems, risk exposure reports, and the risk profiles of both BNI and its Integrated Risk Profile. Additionally, the Board of Commissioners, assisted by the Risk Oversight Committee, supervised and evaluated the implementation of the risk management system carried out by the Board of Directors. Operational work units' proposed mitigation plans were also deemed effective and adequate in addressing the risks faced by the Bank.

The Board of Directors identified key risks related to information technology, such as operational disruptions, cybersecurity, and disaster recovery, ensuring that these risks are managed effectively and integrated into BNI's overall risk management framework. Furthermore, the Board of Directors ensured that BNI has adequate processes for addressing significant external risks, including health crises, supply chain disruptions, and geopolitical tensions. This framework is designed to function ex-ante, building resilience before a crisis occurs, and ex-post, enabling the Bank to manage crises effectively during unexpected events. [ACGS D.3.19]

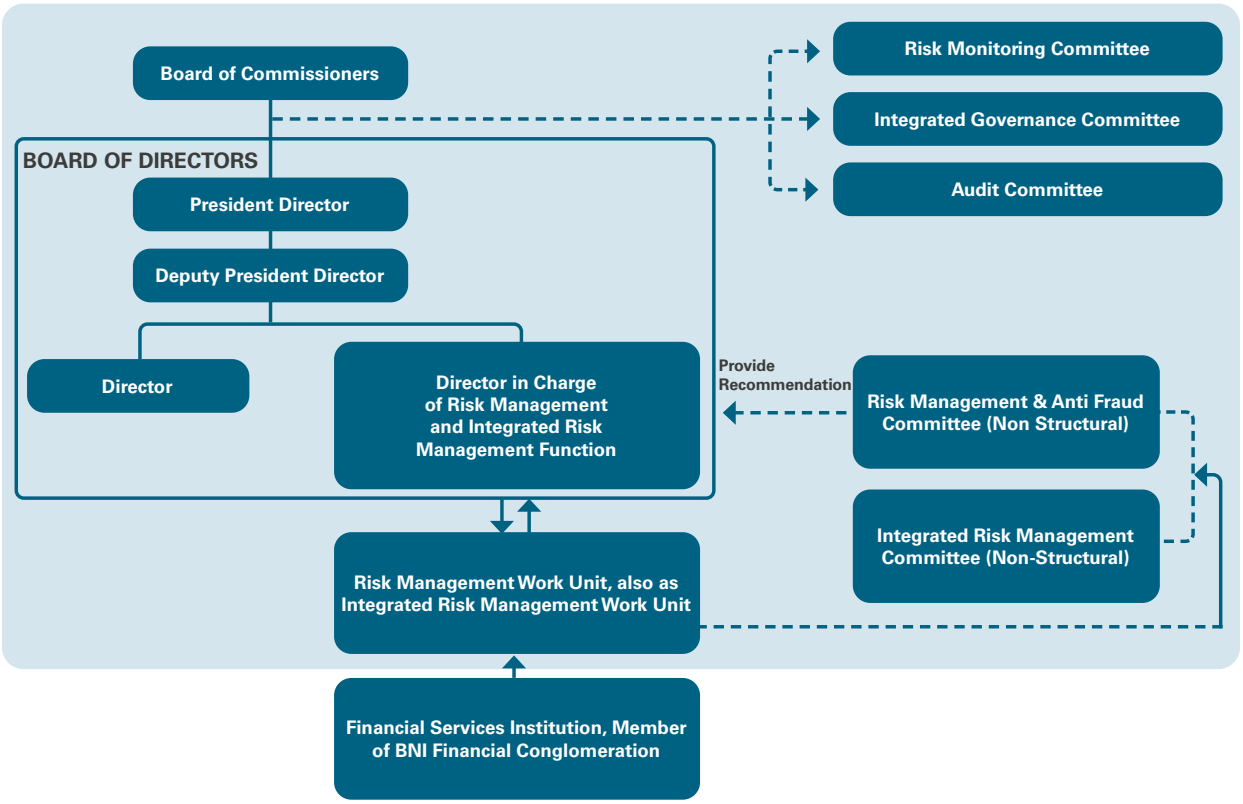
In addition, BNI also prioritizes managing the rapidly evolving risks associated with digital security, including data protection, cloud solutions, authentication methods, and safeguarding employees working remotely over external networks. Like other risks, these digital risks must be fully integrated into the Bank's risk management framework to ensure preparedness and resilience against various threats.

Based on the review of BNI's risk management implementation, both individually and as part of its Financial Conglomerate, and following discussions with Management, the Risk Oversight Committee, Audit Committee, Independent Auditors, Internal Auditors, and several relevant divisions, the Board of Directors and Board of Commissioners state that the Bank has an effective and adequate internal control system to manage the risks faced during 2024. These risks remain within the Bank's tolerance limits, supporting the achievement of the Bank's objectives.

STRUCTURE OF BNI'S RISK MANAGEMENT UNIT

The Risk Management Unit's functions at BNI are carried out by the Enterprise Risk Management Division. Hierarchically, the Enterprise Risk Management Division is under and directly reports to the Director of Risk Management, who oversees BNI's Risk Management Function.

The organizational structure of BNI's Risk Management Unit as of December 31, 2024, is detailed in the following chart:



Notes:
1. The BNI Board of Directors and the Board of Commissioners are authorized and responsible for ensuring the implementation of Risk Management for BNI on an individual basis and Integrated Risk Management.
2. In performing their supervisory role over the implementation of BNI's Risk Management and Integrated Risk Management, the BNI Board of Commissioners is supported by the Risk Oversight Committee, Audit Committee, Nomination & Remuneration Committee, and Integrated Governance Committee.
3. The BNI Director overseeing the Risk Management function is responsible for implementing both individual Risk Management for BNI and Integrated Risk Management for BNI's Financial Conglomerate.
4. To ensure effective risk management, the Board of Directors is assisted by the Risk Management & Anti-Fraud Committee's Risk Management Sub-Committee (KRA-RMC) and the Integrated Risk Management Committee (KMRT).

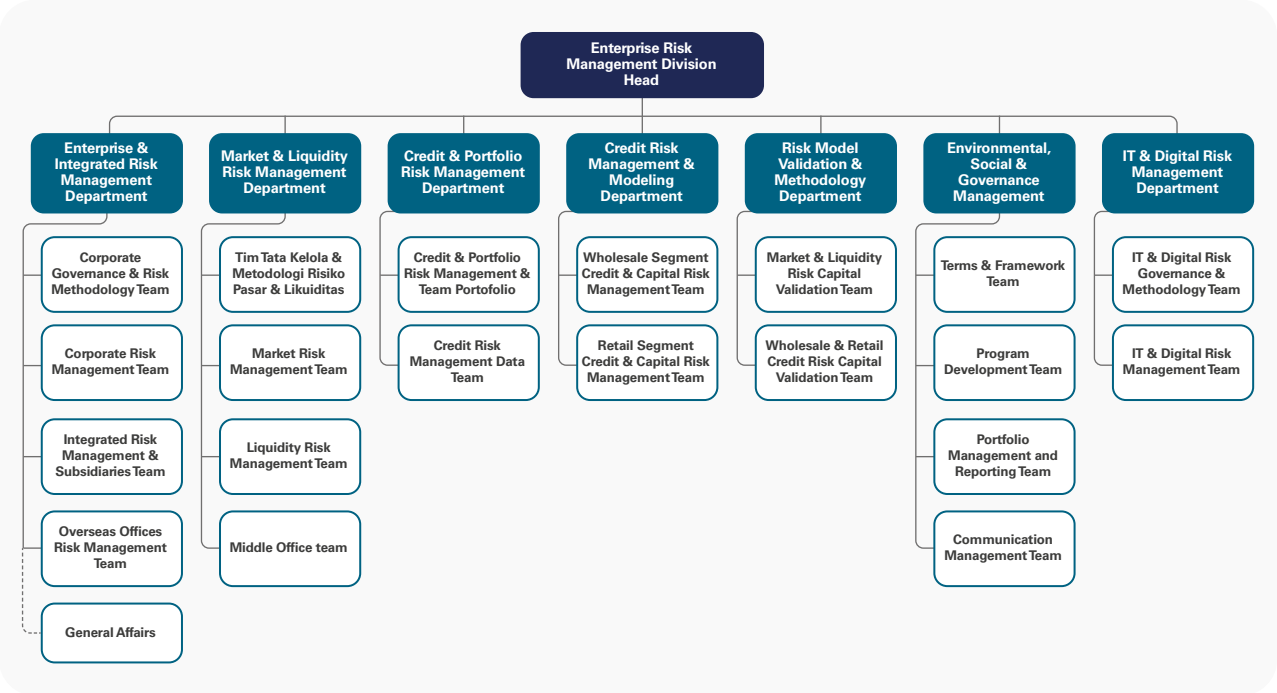
5. If deemed necessary, the Director overseeing the Risk Management function may address risk-related issues in other committee meetings at the Board level or during Board of Directors' Meetings.
6. In implementing BNI's Risk Management, the Board of Directors is supported by the Risk Management Unit (SKMR), which also functions as the Integrated Risk Management Unit (SKMRT).
7. The Risk Management Unit is responsible for facilitating and coordinating with risk management units within BNI and across Financial Services Institutions (LJK) within the Financial Conglomerate to manage 8 (eight) types of risks at BNI: credit risk, market risk, liquidity risk, operational risk, legal risk, strategic risk, compliance risk, and reputational risk, as well as 10 (ten) types of risks in BNI's Financial Conglomerate, including intra-group transaction risk and insurance risk.
8. The Risk Management Unit, in performing its functions, authority, and responsibilities, operates independently of operational units (Risk Taking Units) and does not engage in activities related to the Bank's business.
9. In executing its role, the Risk Management Unit has the authority to escalate issues to the Risk Management & Anti-Fraud Committee (Risk Management Sub-Committee/KRA-RMC) or the Director overseeing the Risk Management function. Similarly, the Integrated Risk Management Unit can escalate issues to the Integrated Risk Management Committee or the Director responsible for the Integrated Risk Management function.

ENTERPRISE RISK MANAGEMENT (ERM) DIVISION

The Enterprise Risk Management (ERM) Division at BNI functions as the Risk Management Unit (SKMR) and Integrated Risk Management Unit (SKMRT), reporting directly to and under the supervision of the Director of Risk Management. This Director oversees two primary functions: Risk Management and Integrated Risk Management.

Organizational Structure of the Enterprise Risk Management Division

The organizational structure of the Enterprise Risk Management Division as of December 31, 2024, is as follows:



Enterprise Risk Management Division Head Profile



Rayendra Minarsa Goenawan, M.M, B.C.Sc.
Enterprise Risk Management Division Head

Age
40 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Master's degree in Management from Universitas Bina Nusantara

Legal Basis of Appointment
Board of Directors Decree No. KP/289/DIR/R dated June 16, 2023

Terms of Office
February 17, 2022 - present

Professional Certification and/or Training
- Risk Management Certification Level 6 (six)
- BSE Business Essential - Innovation & Digital Disruption Stream
- Business Essentials Program Innovation and Digital Disruption Course
- Innovation of Products and Services: Design Thinking

Work Experience
BNI:
Enterprise Risk Management Division Head - at PT Bank Negara Indonesia (Persero) Tbk (2022 - present)

Other Companies
- Enterprise Risk Management Head - PT Bank OCBC NISP (2017 - 2022)
- Enterprise Policy and Portfolio Management Specialist - PT Bank OCBC NISP (2013 - 2016)
- Overseas Branch Coordinator - Maybank Mauritius (Formerly known as PT Bank Internasional Indonesia) (2007 - 2012)
- IT Specialist - YLB - Wasiat (2005 - 2007)

Concurrent Position
Has no concurrent position.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders.

Competency Development of Enterprise Risk Management Division Head in 2024

Competency Development Materials	Date of Implementation	Organizer
ESG Benchmarking	June 19-22, 2024	BNI
Bank Indonesia Risk Management International seminar: "Enhancing Enterprise-wide Risk Early System and Integrated Crisis Management Through Digitalization"	June 27-28, 2024	Bank Indonesia
Speaker at Bankers Association for Risk Management (BARa)	August 7-8, 2024	Bankers Association for Risk Management (BARa)
Feasibility Study Sharing Session for Leaders – IT Business Case	August 30, 2024	BNI
National Seminar of the Communication Forum of the Board of Commissioners of Regional Development Banks throughout Indonesia (FKDK-BPDSI): "Discussion of POJK No. 5 of 2024 (Obligation of Banks to Develop a Recovery Plan) and PLPS No. 1 of 2021 (Obligation of Banks to Develop a Resolution Plan)"	October 9, 2024	Forum Komunikasi Dewan Komisaris Bank Pembangunan Daerah Seluruh Indonesia (FKDK-BPDSI)
ACMF – ISSB Technical Training on the IFRS Sustainability Disclosure Standards (ISSB Standards)	October 20-25, 2024	ASEAN Capital Markets Forum and IFRS Sustainability
29th Climate Change Conference (COP 29)	November 11-22, 2024	Ministry of Environment and Forestry, Azerbaijan

Duties and Responsibilities of the Enterprise Risk Management Division

As the Risk Management Work Unit (SKMR) and Integrated Risk Management Work Unit (SKMRT), the Enterprise Risk Management Division performs the following functions:

1. Managing and developing the Bank's and Integrated strategies, risk management frameworks, Risk Appetite, Risk Tolerance
2. Managing and developing the Bank's and Integrated policies, procedures and methodologies for risk management
3. Managing, developing and strengthening the implementation of risk management including performing risk advisory functions
4. Managing, developing and coordinating the preparation of Recovery Plans and Resolution Plans
5. Managing, developing and coordinating the preparation of Risk Profiles and Bank Health Levels individually, as well as in a consolidated and integrated manner

6. Encouraging the implementation of Risk Culture in all BNI organizations and Subsidiaries and conducting Risk Maturity assessments/ enhancements
7. Managing and developing methodologies and conducting risk-based bank management assessments by initiating Capital Allocation calculations, Risk Adjusted Performance Measurement (RAPM) and Internal Capital Adequacy Assessment Process (ICAAP)
8. Preparing studies and proposals for risk mitigation of new products and activities as well as bank product development
9. Managing and developing as well as conducting assessments and follow-ups on the implementation of risk management in accordance with the provisions of the Regulator and other external parties
10. Managing and developing risk and capital exposures disclosure of BNI and Integrated
11. Managing and developing the Risk Management Information System
12. Providing assistance in the implementation of risk management in subsidiaries and overseas offices (KLN)
13. Managing and developing strategies, risk management frameworks, Risk Appetite, Risk Tolerance for Market Risk and Liquidity Risk
14. Managing and developing policies, procedures, methodologies and early warning system for market risk and liquidity risk management
15. Conducting management of measurement, monitoring and analysis of market risk, early warning system and stress tests of the Treasury Division (TRS) and Overseas Offices portfolios
16. Carrying out the preparation, measurement and analysis of the Bank's market and liquidity risk profiles as well as assisting in the preparation of risk profiles for Subsidiary Companies
17. Updating the Recovery Plan and Resolution Plan Documents for Market and Liquidity Risks
18. Conducting management of measurement, monitoring and analysis of liquidity risk, early warning system as well as stress tests portfolio of Treasury Division (TRS) and Overseas Offices
19. Managing the implementation of the Middle Office function, especially for market risk, liquidity risk and business risk/investment risk in the portfolio of the Treasury Division (TRS), Overseas Offices and Pension Fund (PSF)
20. Providing advisory in preparing studies, policies and strategies and implementing risk management
21. Preparing studies and proposals for risk mitigation of new products and activities as well as the development of bank products
22. Managing and developing disclosure of market and liquidity risks
23. Managing and developing information systems, applications and solutions for managing market and liquidity risks
24. Managing and developing credit risk appetite methodology
25. Managing and developing frameworks, credit risk portfolio management methodologies and Loan Portfolio Guideline and Loan Exposure Limit determination
26. Monitoring and evaluating loan portfolio, loan portfolio projection scenario analysis, as well as problem diagnosis and improvement recommendations
27. Managing and developing BNI Credit Risk Profile methodology, conducting assessment, analysis and monitoring of follow-up credit risk profile improvements, as well as developing Credit Risk Premium (CRP) methodology and calculation
28. Managing, developing methodology and implementing credit risk stress testing calculation according to Regulator's request and internal needs
29. Managing and developing credit risk capital adequacy measurement methodology according to regulation, as well as conducting calculation, review and evaluation of Credit Risk Weighted Assets (RWA) and Leverage Ratio
30. Preparing risk mitigation studies and proposals for new products and activities, as well as bank product development
31. Managing and developing Credit Risk Management & Portfolio Policies/Procedures/ Technical Instructions
32. Managing and developing qualitative and quantitative credit risk management disclosure as a manifestation of the Bank's accountability
33. Managing and developing country risk and transfer risk control methodologies, including identification, measurement, and monitoring
34. Conducting business risk analysis on the provision of Country Exposure Limit (CEL)
35. Managing and developing credit risk database, datamart and data dictionary
36. Providing assistance in the implementation of credit risk management in subsidiaries and Overseas Offices (KLN)
37. Managing and developing an Internal Rating Based model for Corporate, Medium, Small and Consumer Loans
38. Managing and developing an internal early warning model and tools for Corporate, Medium, Small and Consumer Loans
39. Managing and developing a component model forming Expected Credit Loss (ECL), Credit Risk Premium, stress tests

40. Managing and developing the Internal Rating System (IRS) and Integrated Decision Automated System (IDEAS) as well as integration and alignment with the surrounding system and wholesale and retail segment policies
41. Conducting assessments, backtesting, reviews and managing cooperation on the use of external Early Warning Mechanism, credit bureau, rating system for Financial Institution/Bank, and other alternative credit scoring/risk modeling
42. Compiling guidelines in the form of risk acceptance criteria, financial ratio standards, and industry risk portfolios for wholesale (including international) and retail segments
43. Conducting assessments, reviews, and monitoring of cooperation with partners who will/have collaborated as providers of information technology-based financial services
44. Conducting analysis, insight and corporate action strategy preparation based on simulation results and data modeling in the Corporate, Medium, Small and Consumer segments
45. Conducting assessments and credit risk studies on new products and activities in the Corporate (including international), Medium, Small and Consumer segments and subsidiaries
46. Managing and developing Company Guidelines related to rating/credit scoring/other credit risk modeling
47. Managing and developing infrastructure and validate methodology and reperformance of credit risk models for wholesale and retail segments
48. Managing and developing methodology and calculation of credit risk back testing models to identify the adequacy of reserves for collective and individual models in the formation of Expected Credit Loss (ECL)
49. Managing and developing methodology and calculation of credit risk and market risk back testing models in accordance with regulatory provisions, current internal policies and changes in macroeconomic conditions
50. Validating and analyzing, as well as recommending market risk models for Value at Risk (VaR) and Interest Risk in Banking Book (IRRBB) models and BNI and Overseas Offices liquidity risks
51. Validating and analyzing, as well as recommending operational risk methodologies, enterprise risks, and models that have potential risks for BNI, Subsidiaries and Overseas Offices
52. Conducting reviews and providing recommendations in the development of new projects/models/methodologies for credit, market/liquidity, operational and enterprise risk models for BNI, Subsidiaries and Overseas Offices
53. Managing and developing ARIMA projections of changes in macroeconomic conditions on credit index movements for all bank business segments
54. Managing and developing calculations of Allowance for Impairment Losses
55. Managing and developing the determination or definition of Cure Rate and determining the Workout Period limit
56. Managing and developing validation of stress testing calculations for credit risk, market/liquidity risk for BNI, Subsidiaries, and Overseas Offices
57. Managing and developing policies and procedures related to Model Validation and Backtesting of Risk Models and other Models that have potential model risks
58. Managing and preparing the Model Risk Management framework
59. Developing ESG framework & roadmap as a guide for the Bank in implementing ESG principles
60. Developing, reviewing and monitoring the Bank's Net Zero Emission roadmap
61. Developing a framework, managing and monitoring climate change risk
62. Coordinating the implementation of ESG principles & Climate Change Risk across all Bank business lines, including Subsidiaries and Overseas Offices
63. Acting as a liaison with external parties related to ESG implementation
64. Carrying out activities as the Supporting Staff Group (SSG) of the ESG Sub-Committee coordinator
65. Monitoring and managing the realization of ESG implementation based on a bankwide roadmap
66. Coordinating the preparation and monitoring of the implementation of the Sustainable Finance Action Plan (RAKB) and/or Corporate Plan related to ESG
67. Conducting exposure monitoring and reporting to regulators/other external parties related to ESG (Green portfolio, Green Bond and other ESG-oriented bonds, Indonesian Green Taxonomy (THI), Sustainability Report (sustainable governance, sustainable management, sustainable financing and carbon emission data) etc.)
68. Managing and developing Digital Risk Management (DRM) and Technology, Information, and Cybersecurity Risk Policies, standardization, framework and methodology
69. Conducting and developing testing and recommendations for mitigating Digital Risk risks specifically 3rd party risk in the Technology, Information & Cyber Risk aspects

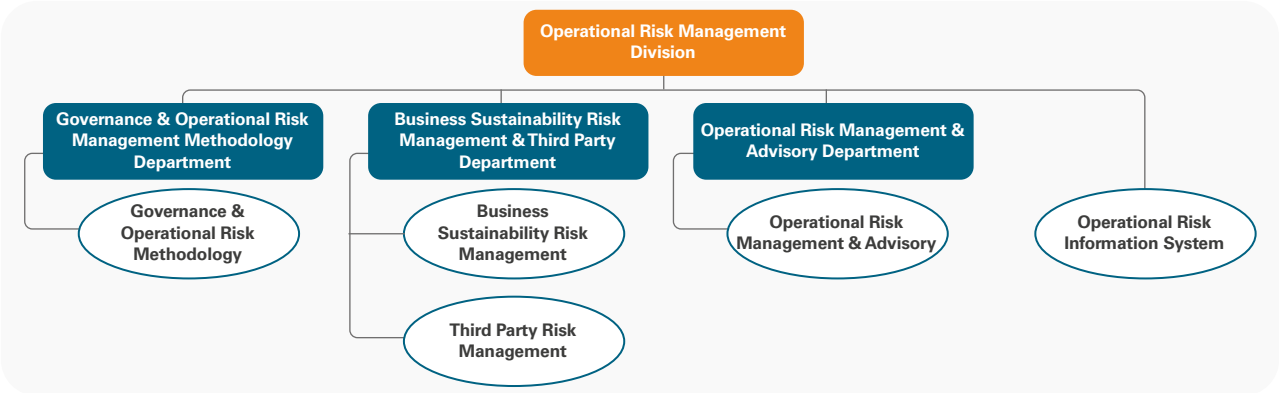
70. Conducting studies, providing recommendations and evaluating Technology, Information and Cyber Security Risk on products, activities, and use of existing technology
71. Managing and developing the Cyber Risk Defense Road Map in order to improve Cyber Security Maturity
72. Conducting testing and development of follow-up recommendations for risk mitigation on cyber security and resilience on all systems and applications bankwide
73. Managing and developing Digital risk management for all Divisions/Units/Regions/Branches/Centers/Overseas Offices, as well as other units that are risk owners
74. Managing and developing Digital risk mitigation for products, activities, and use of new and existing technologies
75. Managing and developing reporting of Digital Risk Bank, Technology, Information & Cyber Risk and 3rd party Digital Risk
76. Managing and developing Technology Risk, Information Risk, & Cyber Security Risk and coordinating with related units
77. Providing assistance in the Implementation of IT and Digital Risk Management in Subsidiaries and Overseas Offices.

OPERATIONAL RISK MANAGEMENT DIVISION

In addition to the ERM Division, BNI has also established the Operational Risk Management (ORM) Division, which serves as the Risk Management Unit (SKMR) and the Integrated Risk Management Work Unit (SKMRT), which are directly under the supervision and responsible to the Risk Management Director. This Director oversees two main functions, namely the Risk Management function and the Integrated Risk Management function.

Organizational Structure of the Operational Risk Management Division

The structure of the Operational Risk Management Division as of December 31, 2024, is as follows:



Operational Risk Management Division Head Profile



Adi Surya Djoko, MBA
Operational Risk Management Division Head

Age
47 years old as of December 31, 2024

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Master of Business Administration from University of Western Australia

Legal Basis of Appointment
Board of Directors' Decree No. KP/878/DIR/R dated December 28, 2023.

Terms of Office
December 12, 2023 - present

Professional Certification and/or Training
1. Risk Management Certification - Qualification Level 6
2. Certified Anti-Money Laundering Specialist (CAMS)
3. Certified Risk Information System Control (CRISC)
4. Certificate in Operational Risk Management (CORM)
5. Certified Governance Risk & Compliance Professional (GRCP)
6. Certified Governance Risk & Compliance Audit (GRCA)

Work Experience
BNI
- Operational Risk Management Division Head (2023 – present)

Other Companies
- Country Head of Operational Risk Management di Citibank (2019-2023)
- Group Head Operational Risk di PT Bank Mandiri (Persero) Tbk. (2016-2019)
- Director, Head of Process & Governance, Commercial Banking at Standard Chartered Bank (2015-2016)
- Head of Operational Risk Management at Maybank (2012-2015)
- Head of Operational Risk & Control at PT Bank Ekonomi Raharja Tbk, member of HSBC Group (2011-2012)
- Vice President Operational Risk & Control at HSBC (2003-2011)
- Financial Analyst & System Development at PT Astra Honda Motor (1999-2002)

Concurrent Position
Has no concurrent position.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders.

Competency Development of Operational Risk Management Division Head in 2024

Competency Development Materials	Date of Implementation	Organizer
Risk Management Certification - Qualification Level 6	June 14, 2024	LSPP
Sanctions Masterclass: Investment & Securities	October11, 2024	ACAMS
Nexus of Cyber Ransomware & Sanctions Compliance	September 15, 2024	ACAMS
Paving the Path to Perpetual KYC	October 5, 2024	ACAMS
Utilizing Forensic Account to Identify Fraud & Money Laundering Topologies and Strengthening anti-fraud control	September15, 2024	ACAMS

DUTIES AND RESPONSIBILITIES OF THE OPERATIONAL RISK MANAGEMENT DIVISION

The Operational Risk Management Division broadly undertakes the following duties and responsibilities:
1. Formulating and developing the Operational Risk Management and Business Continuity Management (BCM) frameworks.
2. Managing and enhancing tools and methodologies for operational risk management and BCM.
3. Preparing, evaluating, and presenting proposals for setting the Risk Appetite and Risk Tolerance to the Board of Directors.
4. Managing and refining the calculation of Operational Risk-Weighted Assets (ATMR) in accordance with regulatory requirements.
5. Monitoring the implementation of the Operational Risk Management and BCM frameworks.
6. Managing and advancing programs to enhance Operational Risk Awareness.
7. Conducting studies and analyses of operational risks.
8. Providing advisory support to managed units in conducting assessments and offering recommendations for mitigating operational risks associated with the bank's products and/or activities.

DEVELOPMENT OF RISK MANAGEMENT COMPETENCIES IN 2024

Throughout 2024, the Enterprise Risk Management Division and the Operational Risk Management Division actively participated in various competency development programs. These initiatives aimed to enhance team capabilities and expertise through both internal and external training sessions. The following outlines the competency development activities undertaken in 2024:

Competency Development Materials	Date of Implementation	Organizer
RACE Talk Series: "Next-Level Integrated Credit Tool in Wholesale Banking"	January 2024	BNI
Industry Training on Fast Moving Consumer Goods (FMCG) and Palm Oil Analysis	February 2024	BNI
Risk Maturity Index (RMI) Implementation Workshop	February 2024	Asosiasi GIRMA (Global Integrated Risk Management Association
Batch II Risk Maturity Index (RMI) Appraiser Training by PT PMLI	March 2024	Kementerian BUMN
Training on Firm-Wide Stress Testing using Web-App & Mobile App	April 2024	Ikatan Sarjana Ekonomi Indonesia (ISEI)
Implementing Governance Risk Compliance (GRC)	June 2024	LSP GRK
Certified Implementation of Governance, Risk Management, & Compliance (GRC)	June 2024	BNSP
Financial Risk Management Part 1 Exam Preparation	July - September 2024	KAPLAN Edupac
Human Capital Management For Leaders (Batch 2&3)	July 2024	Eclat Consulting
Corporate Finance Training	August 2024	BNI
Banking Risk Management Certification Qualification Level (JK) 5	September 2024	Badan Sertifikasi Manajemen Risiko (BSMR)
Office 365 Enterprise for Change Agent Training	September 2024	Mitra Integrasi Informatika
AFC Trends & Typologies: Pushing Back on Authorised Push Payment Fraud	September 2024	ACAMS
Implementing an Effective Tax Risk Management Framework	September 2024	ACAMS
Consortium Analytics: Stopping Fraud in New and Legacy Payment Channels	September 2024	ACAMS
Does Your Transaction Monitoring Capture Your Financial Crime Risk SP Captioned	September 2024	ACAMS
It's Not KYC: The Truth About Identity Verification	September 2024	ACAMS
Sanctions Masterclass - Exploring the Intersection of Ransomware Crypto and Sanctions Risks	September 2024	ACAMS
ACAMS moneylaundering.com 2023 Year-in-Review and 2024 Outlook	September 2024	ACAMS
Track the Traffickers: Answering FATF's Call to Fight the Illegal Wildlife Trade	September 2024	ACAMS
Sanctions Masterclass: Jurisdiction and Sanctions Regime: Rapid-Fire Update	September 2024	ACAMS
AFC in Practice: Reviewing Whistleblowing Legislation and Standards	September 2024	ACAMS
Jurisdiction and Sanctions Regimes: Rapid-Fire Update	September 2024	ACAMS
Masterclass: Lessons in Corporate Entity Research	September 2024	ACAMS
Sanctions Masterclass: Proliferation Financing Fundamentals and Emerging Trends	September 2024	ACAMS
Mobile App Development Couse	October 2024	Timedoor Academy Pro
Training for Trainers (TFT) on Personal Data Protection Law	October 2024	BNI
Training on Threshold Analysis and Data Protection Impact Assessment (DPIA) related to Personal Data Protection	October 2024	BNI
Training on the Use of Generative AI in e-PP Application (BNI DigiCode)	November 2024	BNI
BNI Culture Fest 2024	November 2024	BNI
Risk Based Planning and Risk Modeling Training	November 2024	Ministry of SOEs
Model Risk Management Effective Implementation	November 2024	Infopro Digital Risk (IP) Limited
Workshop Requirement Gathering Inisiatif Solusi E-Statement	November 2024	BNI
Training on Business Plan 2025 Preparation	December 2024	BNI
Directorate Activity Plan for 2025 at BARa Board Meeting	December 2024	Bankers Association for Risk Management (BARa)
Technical Training on Personal Data Protection	December 2024	Deloitte

RISK MANAGEMENT CERTIFICATION

As of December 31, 2024, risk management certification has been conducted as part of efforts to enhance professionalism, performance, and individual potential in supporting the execution of risk management responsibilities. The certifications completed include:

Qualification Level	Mandatory Position	Total Employee
4	Non-Executive Officers in areas related to risk management, compliance, internal audit and key operations (taking and implementing decisions on credit/financing, treasury, information technology and financial risks).	4,223
5	Employees who meet the criteria of Executive Officers in areas related to risk management, compliance, internal audit and key operations (taking and implementing decisions on credit/financing, treasury, information technology and financial risks).	1,924
6	Board of Commissioners (BoC) and SEVP	6 BoC; 5 SEVP;122 Other Employee
7	Board of Directors (BoD)	2 BoC; 12 BoD; 2 SEVP; 12 Other Employee

BOARD OF DIRECTORS' ASSESSMENT OF THE RISK MANAGEMENT UNIT'S PERFORMANCE

In 2024, the performance evaluation of BNI's Risk Management Unit (SKMR) remained a primary focus of the Board of Directors to ensure effective risk management aligned with the Bank's performance objectives. SKMR consistently conducted routine assessments of asset quality, operational risk control, and strategic initiatives. The evaluation results indicated that the Bank's key risks remained within the established risk appetite. This effort was further supported by initiatives to enhance asset quality and adopt best-practice operational standards, including capital optimization and digital transformation. These transformations improved the speed of data-driven decision-making processes, enabling BNI to sustain credit growth and healthy performance amid this year's dynamic market challenges.

BNI also continued to optimize low-risk credit segments, emphasizing growth in corporate and consumer sectors while maintaining liquidity by improving the CASA ratio. These initiatives and strategies allowed BNI to achieve positive consolidated net profit in the first half of 2024, driven by 11.7% year-on-year credit growth and the addition of healthy, well-managed assets. These improvements underscore BNI's ability to manage risks effectively through an adaptive strategic approach.

REALIZATION OF TARGETS AND STRATEGIC INITIATIVES FOR RISK MANAGEMENT IMPLEMENTATION IN 2024

BNI has set a number of strategic targets and initiatives in implementing risk management to strengthen overall risk management. The realization of strategic targets and initiatives for implementing risk management in 2024 are:

A. Credit Risk

1. Reviewing Credit Risk Appetite and monthly monitoring
2. Conduct calculation of Risk Weighted Assets (RWA) for Credit Risk
3. Carrying out calculation of Leverage Ratio
4. Preparing disclosure of quantitative and qualitative exposure to Credit Risk
5. Conduct credit risk stress testing
6. Conduct analysis/assessment of Credit Risk on new/existing Bank products, activities and transactions
7. Review of parameters and measurement of Credit Risk Profile
8. Conduct scenario analysis of credit risk in Recovery Plan document
9. Technical instructions for identification of transferable assets
10. Carry out Review of Credit Risk Management Procedures
11. Conduct review of BNI Loan Exposure Limit (LEL) 2024
12. Conduct review of Credit Risk Premium (CRP) calculation 2024
13. Conduct analysis/study of loan portfolio
14. Monitoring of loan space available periodically
15. Conduct review of Loan Portfolio Guideline

16. Carry out credit Risk System Management with credit database coverage and credit risk datamart
17. Carry out Management Assistance Credit Risk in Subsidiaries and Overseas Offices (KLN)
18. Country risk and transfer risk control methodology
19. Reviewing financial ratio standards per industry for 2024
20. Prepare a Review of Industry Risk Rating (IRR) in 2024
21. Review of Industry Risk Appetite in 2024
22. Prepare Risk Acceptance Criteria per Prospective Economic Sector for the wholesale and retail segments (including KLN and NBFI)
23. Monitoring the implementation of the rating system for FI/Bank
24. Monitoring the Business Banking debtor rating system in the corporate, medium and small segments
25. Reviewing the IRB model and improving the debtor rating system in the corporate, medium and small segments
26. Monitoring the Early Warning System (EWS) system in the corporate segment for public companies
27. Development of credit risk measurement – Review of PSAK 71 impairment model
28. Develop, review, and/or calibration credit scoring (application/behavior/collection) and other risk modeling through the utilization of internal (customer level) and external data for Consumer, Retail Mass, and Small Segment Credit Products
29. Implementation and implementation monitoring of credit scoring logic/rules (application/behavior/collection) for Consumer, Retail Mass, Small Segment Credit Products on Integrated Decision Automated System (IDEAS) and in scoring modules found in other surrounding systems
30. Enhance IDEAS through the addition of internal data, external data, and integration of surrounding systems
31. Prepare analytical reports for consumer and retail portfolios
32. Conduct credit risk assessment related to the Bank Partner cooperation plan as a technology-based financial service provider
33. Carry out data enrichment to improve scoring capabilities by using external data as additional analysis for credit decision making
34. Actively participate in the development of improvements to the End to End Credit Process that is more prudent and systemized:
    a. LMS (Loan Management System) Wholesale
    b. LMS Retail
    c. SIMON (Single Integrated Monitoring)
    d. RM Tools
    e. Prime Customers and TAT Dashboard
    f. BNI Move
35. Preparing Technical Instructions/ Implementation Instructions related to rating/ credit scoring/other credit risk modeling
36. Conduct credit risk assessment of new products and activities in the Corporate (including international), Medium, Small and Consumer segments and Subsidiaries
37. Carry out validation of SME Scoring Model Maximum Credit of IDR5 billion
38. Conduct validation of Internal Industry Risk Rating Model Semester 1 of 2024
39. Conduct validation of Loan Exposure Limit (LEL) Calculation in 2024
40. Carry out validation of Portfolio Category Determination in Credit Risk ATMR Calculation in 2024
41. Carry out credit backtesting related to BNI's collaboration with Fintech
42. Conduct initial Independent Review of CBI Credit Scoring Model
43. Validating the Credit Risk Premium (CRP) in 2024
44. Conduct validation of Joint Stress Test of Credit Risk in 2024
45. Carry out validation of BNI Credit Card Behavior Scorecard (CCBS) V.3
46. Carry out validation of BNI Fleksi Aplication Scorecard V.2 Model
47. Conduct validation of BNI Fleksi Pensiun Application Scorecard V.3
48. Conduct Independent Review of BNI Griya Application Scorecard V.3
49. Conduct Independent Review of Single Integrated Monitoring Tool (SIMON) Model for Corporate, Medium, and Small Segments
50. Conduct Independent Review of Internal Rating System (IRS) 2.0 Model for Corporate, Medium, and Small Segments
51. Independent Review of Loan Quality Calculation in 2024
52. Conduct Independent Review of Credit Risk Stress Test in Recovery Plan in 2024
53. Carry out backtesting of ECL Reserve Adequacy
54. Reviewing the Determination of Debtor's Prime Customers Existing to Bank (ETB) SME Segment

55. Reviewing the Criteria for New Prime Debtors (New To Bank) SME Segment
56. Conduct review of Client Tiering Implementation (Diamond and Non-Diamond)
57. Prepare Sustainable Finance Action Plan (RAKB) 2024
58. Carry out review of Sustainable Priority Activities/Programs in BNI's Sustainable Finance Action Plan (RAKB) 2024-2028
59. Quarterly monitoring of RAKB implementation in 2024
60. Carry out review of Green Bond distribution in accordance with BNI's Green Bond framework
61. Prepare BNI Green Bond Report 2024
62. Develop the Climate Risk Stress Test
63. Evaluate the Green Loan incentive implementation
64. Carry out calculation of financing emissions for small segments
65. Conduct ESG Management Assistance in Subsidiaries and Overseas Offices (KLN)
66. Carry out monitoring of Environmental, Social, and Governance (ESG) exposure, Indonesian Green Taxonomy (THI), and Sustainability Report (SR)
67. Implement the Environmental, Social, and Governance (ESG) Campaign

B. Market Risk

1. Reviewing and developing Market Risk Management Strategy and Framework
2. Reviewing and developing Risk Appetite and Risk Tolerance for Market Risk in 2024
3. Review and develop Market Risk management procedures and methodologies for both Banking Book and Trading Book
4. Reviewing IRRBB (Interest Rate Risk In Banking Book) procedure, methodology and reporting documents for BNI Individual and Consolidation
5. Developing and reviewing Market Risk models/methodologies including:
   a. Market Risk Profile Parameters
   b. Market Risk Stress Testing
   c. Financial Instrument Valuation
   d. Risk Weighted Assets (RWA) Market Risk
6. Prepare qualitative disclosure of Market Risk related to applicable Internal and External Policies
7. Carrying out advisory functions related to Market Risk policies, implementation of risk management in treasury portfolios and pension funds
8. Developing, reviewing, and proposing market risk limits for BNI portfolios, including:
   a. Market Risk Limits (VaR, Budget Loss, Stress VaR)
   b. Review Early Warning System (EWS) Forex parameters; Review Early Warning System (EWS) Interest Rate parameters
   c. Review Off Market Price parameters
   d. Review JIBOR Quotation Fairness parameters
   e. Review the Interest Rate Risk in Banking Book Modeling results
9. Monitoring and controlling treasury business risks (market risk, credit risk, operational risk, and compliance risk)
10. Monitoring and controlling treasury products & business performance at the Head Office and Overseas Offices (KLN)
11. Conducting measurement, monitoring, and analysis of securities portfolios related to holding periods and significance limits
12. Carrying out preparation and analysis of measurement and monitoring of securities purchase risks
13. Monitoring and analyzing the realization of Treasury and Overseas Offices budget loss
14. Monitoring the transaction authority of Treasury and Overseas Offices Dealers
15. Carrying out review and submission of input on the preparation of treasury business operational policies and strategies
16. Manage market risk monitoring systems/ applications
17. Monitoring the Market Risk using an internal model (value at risk/VaR) on the Treasury and Overseas Offices portfolios
18. Evaluate the calculation of BNI's Interest Rate Risk in Banking Book (IRRBB) individually, and compile as well as analyze BNI's IRRBB developments on a consolidated basis
19. Calculation and analysis adequacy of BNI Individual and Consolidated market risk capital using the Standardized Model, namely Risk Weighted Assets (RWA) Market Risk periodically
20. Conducting calculation of exchange rate and interest rate stress testing (market risk stress testing) according to Regulator's request and internal needs to provide an overview of the Bank's resilience to extreme interest rate and exchange rate movements
21. Prepare scenario analysis of the impact of changes in BNI's conditions in the Recovery Plan document
22. Compiling individual market risk profiles and providing advisory assistance on the preparation of risk profiles for Subsidiary Company periodically
23. Disclosure of market risk related to quantitative monitoring based on BNI's market risk development monitoring activities

24. Carrying out Market Risk analysis/assessment on new/existing Bank products, activities and transactions and preparing risk mitigation proposals and submitting them to the relevant units
25. Monitoring counterparty limits
26. Evaluating the calculation of Net Open Position (NOP)
27. Providing recommendations on Determining Maturity Profile Limits
28. Conducting validation of JIBOR Fairness Limit Calculation in 2024
29. Carrying out validation of Forex Banking VaR Calculation Using the Historical Simulation – Perturbation Method on the KGR System
30. Reviewing the K+ Output on DV01 Calculation
31. Conducting backtesting on BNI Overseas Offices VaR and Head Office VaR
32. Reviewing the SVaR Calculation Methodology and SVaR Limit in 2023
33. Reviewing the Market Risk Stress Test on Joint Stress Test (JST) in 2024
34. Reviewing the Forex & Securities Market Limit Off Calculation Methodology
35. Validate the Climate Risk Stress Test (CRST) in 2024 for Corporate and Middle Segments
36. Validate the Climate Risk Stress Test (CRST) in 2024 for Middle Segments
37. Evaluate the calculation of Interest Rate Risk in The Banking Book (IRRBB)
38. Reviewing the Value at Risk (VaR) Calculation Methodology for Bond Portfolios
39. Backtesting Value at Risk (VaR) for Bond Portfolios
40. Reviewing the Sensitivity Analysis Calculation Methodology using DV01 for Bond Portfolios

C. Liquidity Risk

1. 1. Reviewing Liquidity Risk Management Procedures, Domestic and Overseas Office Liquidity Risk Management Procedures and Methodologies, BNI Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) procedures, methodologies and reporting individually and on a consolidated basis.
2. Conducting limit reviews and developing Liquidity Risk Management Procedures and Methodologies, which include:
   a. BNI Wide and Regional Rupiah and Foreign Currency Cash Ceilings
   b. Safety Level Limits for both Rupiah and Foreign Currency
   c. Maturity Profile Limits for both Rupiah and Foreign Currency
   d. Early Warning Signal for both Rupiah and Foreign Currency
3. Monitoring and analyzing BNI Wide cash management and regions
4. Prepare quantitative disclosure of Liquidity Risk exposure
5. Conducting Liquidity Risk stress testing according to schedule (business as usual), monitoring and analyzing the development of incidental liquidity risk stress testing parameters and recovery plan scenario analysis
6. Carrying out Liquidity Risk analysis/ assessment on new/existing Bank products, activities and transactions
7. Reviewing Liquidity Risk Appetite in 2024
8. Reviewing Liquidity Risk Profile parameters and measurements and provide advisory assistance in the preparation of Subsidiary Company risk profiles
9. Monitoring liquidity periodically
10. Preparing Liquidity Stress Test in the Recovery Plan
11. Implementing advisory functions in the implementation of pension fund liquidity risk management
12. Reviewing the Determination of the Ideal Secondary Reserve Limit/Safety Level
13. Validating the Joint Stress Test of Liquidity Risk
14. Validating the BNI Wide Cash Ceiling Limit in 2024
15. Reviewing Calculation of Proposed Regional Cash Ceiling for Yogyakarta (W17) and Banjarmasin (W09)

D. Operational Risk

1. Formulate and develop the framework for Operational Risk Management and Business Continuity Management (BCM).
2. Manage and develop tools and methodologies for operational risk management and BCM.
3. Prepare, evaluate and submit proposals for determining Risk Appetite and Risk Tolerance to the Board of Directors.
4. Manage and develop calculations of Risk Weighted Assets (RWA) for Operational Risk in accordance with Regulatory provisions.
5. Monitor the implementation of the Operational Risk Management and BCM framework.
6. Manage and develop programs to improve Operational Risk Awareness.
7. Manage and develop operational risk studies and analysis.
8. Provide advisory assistance to the management unit in conducting assessments and providing recommendations for operational risk mitigation of bank products and/or activities.
9. Designing and strengthening strategies through strengthening Information Technology (IT) & Digital Risk Management

10. Evaluating and compiling recommendations for mitigating IT & Digital Bank risks, as well as third-party Digital risks
11. Compiling a comprehensive analysis and evaluating IT & Digital Risk for products, activities, and the use of new technologies
12. Developing Cyber Risk Defense Roadmap to improve BNI's resilience and Cyber Security
13. Managing and developing IT & Digital Risk Management for all divisions, units, regions, branches, centers, and other units responsible for the risks
14. Acting as an assessor and actively involved in carrying out risk advisory functions in the process of measuring Digital, Information Technology and Cyber Security maturity standards for regulatory reporting needs
15. Reviewing parameters and measuring BNI and Subsidiary Information Technology (IT) risk profiles
16. Conducting Thematic Reviews as a step to check Vulnerability in Bank Wide systems and applications
17. Conducting Research and Development on solutions to vulnerabilities that impact Bank Wide
18. Conducting simulations related to BNI's cyber resilience and security
19. Provide training and awareness on the implementation of BNI's IT & Digital Risk Management
20. Perform risk advisory functions in strategic projects of Digital Banking, Technology Information and Cyber Security and provide recommendations related to IT & Digital Risk
21. Carry out validation of Calculation of RWA for Operational Risk

E. Legal Risk

1. Reviewing Legal Risk Management Procedures
2. Conducting legal analysis/study in the form of providing written and verbal advice
3. Carrying out legal counseling/training
4. Conducting legal review of non-standard agreements using the scoring system calculation method
5. Providing legal assistance to business units related to business activities
6. Handling and resolving legal cases
7. Supervising case handling
8. Carrying out assessment of Legal Risk on new/existing Bank products, activities, and transactions
9. Reviewing the parameters and measurements of the Legal Risk Profile
10. Conducting legal reviews and following the Credit Committee on credit proposals decided by the Board of Directors

F. Reputation Risk

1. 1.Review Reputation Risk Profile parameters and measurements
2. Monitoring and analyzing negative news based on media frequency and tiering
3. Providing considerations related to reputation risk for new/existing bank products, activities, and transactions
4. Submitting response letters to the mass media regarding customer complaints/grievances against BNI
5. Improving the capabilities of reputation risk management employees regarding risk management both at the Head Office and Regional Offices
6. Fostering good relations with the mass media through various public relations activities
7. Supporting all work units in preparing press releases and/or holding statements in the event of a crisis
8. Preparing monthly agenda setting to enhance positive image
9. Reviewing business process improvements or acceleration of SLA for resolving customer complaints
10. Monitoring and analyzing customer complaint trends in collaboration with the entire value chain to find root causes and solutions
11. Reviewing Reputation Risk Management procedures
12. Monitoring the Reputation Risk of the Company Owner (Government of Indonesia) through:
    a. Monitoring periodically the determination of Indonesia's rating from credit rating agencies
    b. Monitoring the development of macroeconomic, domestic economy, and news that can indicate potential changes to Indonesia's rating
13. Managing BNI Reputation Risk in the context of shareholder and investor trust in BNI through:
    a. Optimizing the results of BNI's rating determination by international credit rating agencies (Fitch, S&P, Moodys) through the provision of good data and communication

b. Monitoring the development of BNI's performance and communicating it regularly to investors
c. Monitoring and analyzing the development of negative sentiment from BNI, and conveying it to management as input from minority shareholders

G. Strategic Risk

1. Sharpening long-term strategy and targets in the 2025-2029 RJPP
2. Preparing medium-term plan in the Bank Business Plan (RBB) reviewed annually by considering macroeconomic conditions, industrial competition, and competitive assessment of peers, as well as internal capabilities in developing strategies that are in line with the long-term plan
3. Preparing Company Work Plan and Budget (RKAP) by considering current internal and external conditions
4. Evaluating and monitoring the realization of the achievement of strategies and targets set in the RBB (will be conducted by comparing with peers) and Business Plan Unit
5. Reviewing and monitoring new products and activities, especially related to digital products and activities in the RPPB process
6. Reviewing the parameters and measurements of the Strategic Risk Profile
7. Conducting more intensive analysis of global and national economic dynamics including projections of important economic indicators to assist strategic decision making in the preparation of the RJPP and RBB
8. Reviewing Strategic Risk Management procedures

H. Compliance Risk

1. Realizing a culture of compliance at all levels of the Bank's organization and business activities
2. Ensuring policies, provisions, systems and procedures as well as business activities carried out by the Bank are in accordance with regulatory provisions and applicable laws and regulations
3. Managing compliance risk
4. Monitoring and maintaining the Bank's compliance with commitments to Bank Indonesia, the Financial Services Authority and other authorities
5. Managing compliance management
6. Improving the quality of the process in implementing compliance activities
7. Monitoring compliance functions in Subsidiaries and Financial Institution Pension Fund (DPLK) as well as Overseas Offices
8. Implementing Good Corporate Governance

I. Risk Integration

1. Managing and developing Risk Appetite and Risk Tolerance that are in line with the Bank's business goals and strategies
2. Developing strategies and implementing Risk Management in the BNI Bank Business Plan (RBB) for 2024-2026
3. Developing methodology and reviewing BNI's Risk Profile and Bank Health Level (TKB) calculations
4. Reviewing General Risk Management Policy (KUMR) and General Internal Control System Policy (KUSPI)
5. Managing and developing Risk Management Procedures, including:
   a. Legal, Strategic, Compliance and Reputation Risks
   b. Recovery Plan
   c. Resolution Plan
   d. Internal Capital Adequacy Assessment Process (ICAAP)
   e. Risk Maturity Index (RMI)
6. Managing and developing Technical Instructions for Risk Profile
7. Implementing Risk Culture in all BNI organizations
8. Implementing the Roadmap for Improving the Risk Management Implementation based on the results of the BNI Risk Maturity Index assessment in 2023
9. Conducting assessments of BNI Risk Maturity Index in 2024
10. Supporting the implementation of the Risk Management training program (basic risk)
11. Conducting analysis and assessment of BNI's Risk Profile and Health Level individually
12. Conducting analysis and assessment of BNI's Risk Profile individually
13. Calculating BNI's Minimum Capital Adequacy Requirement (KPMM) individually
14. Preparing Publication Report on Risk Exposure and Capital, reviewing the Long Form Report (Risk Management) and BNI's Annual Report
15. Carrying out analysis/assessment of Risk on new Bank products and Bank activities
16. Updating BNI's Recovery Plan Document
17. Complying with the Resolvability Test reviewed periodically
18. Compiling Internal Risk Analysis (IRA) including analysis of 8 (eight) types of risk, monitoring Risk Appetite, Risk Tolerance and trigger level Recovery Plan

19. Supporting the implementation of Governance and Significant Corporate Activities of State-Owned Enterprises including:
    a. Risk Management Planning in the Company's Work Plan and Budget (RKAP)
    b. Quarterly and Annual Risk Management Implementation and Monitoring Reports
    c. Quarterly Risk Composite Rating Reports
    d. Preparing Risk Management Strategies and Long-Term Targets in the 2025-2029 RJPP Risk Management Chapter
    e. Completing the Risk Module in the Anaplan Management Information System and KBUMN Virtual Data Room (VDR)
20. Reviewing and analyzing Risk Management to internal and external parties
21. Providing assistance in the implementation of Risk Management in Overseas Offices (KLN)
22. Supporting the implementation of Wealth Management in Singapore KLN
23. Supporting the implementation of Standardization & Centralization of Overseas Branches System

J. Integrated Risks of BNI Financial Conglomerate

1. Review the General Policy of Integrated Risk Management and Integrated Capital (KUMRT) and review the Integrated Capital Management procedures
2. Review the Integrated Risk Appetite Statement and Integrated Risk Limit in 2024
3. Monitor the Integrated Risk Appetite and Integrated Risk Limit
4. Carry out assessment of Risk Profile and Bank Health Level on a Consolidated basis
5. Calculating BNI's Minimum Capital Requirements (KPMM) on a Consolidated and Integrated manner
6. Analyzing and monitoring main risks of all LJK members of the BNI Financial Conglomerate through the Leading Risk Indicator (LRI)
7. Prepare monitoring and review documents for the implementation of integrated risk management
8. Ensuring that all Financial Services Institutions/ Subsidiaries have established policies and procedures related to the implementation of risk management and providing guidance and input to Financial Services Institutions/ Subsidiaries in implementing Risk Management
9. Conducting integrated stress testing
10. Reviewing the Pricing Methodology at BNI Life
11. Conducting backtesting of BNI ECL Reserve Adequacy Finance
12. Reviewing the Value at Risk (VaR) Calculation Methodology for Hibank Bonds Portfolio
13. Reviewing the Issuer Scoring Model Development Methodology at BNI Asset Management

Integrated Risk Management Governance [ACGS C.2.6]

BNI, as a holding company that is also the Main Entity (EU) in the BNI Financial Conglomeration Structure, is obliged to implement Integrated Governance (TKT) in all its business activities with the aim of improving performance, maintaining compliance with laws and regulations, and encouraging the application of ethical values that apply in the financial services industry.

In order to implement a comprehensive and effective TKT, BNI designs and implements an internal control system that is integrated with Subsidiary Companies and all LJKs that are members of the BNI KK, with the aim of supporting the implementation of integrated risk management. In this regard, BNI as EU has also formed a joint commitment between the BNI Internal Audit Work Unit and the SKAI of Subsidiary Companies to carry out an integrated internal audit function and maintain the development of BNI KK audit quality to ensure that the implementation of the internal control function is effective in all operational activities of Subsidiary Companies at all levels of management.

In implementing consolidated and integrated risk management, BNI as EU in the BNI KK has prepared a General Policy for Integrated Risk Management (KUMRT) as a form of Bank compliance with applicable regulations in Indonesia and consistently implements integrated risk management designed to mitigate the risks faced by BNI and its Subsidiaries. As of December 31, 2024, BNI monitors and manages 10 (ten) types of risk, namely credit, market, operational, liquidity, legal, reputation, strategic and compliance risks, intra-group transaction risks, and insurance risks.

In practice, the implementation ofTKT and integrated risk management within the scope of BNI's KK refers to a number of regulations such as:

1. POJK No. 17/POJK.03/2014 ("POJK 17/2014") concerning the Implementation of Integrated Risk Management for Financial Conglomerates;
2. POJK No. 18/POJK.03/2014 ("POJK 18/2014") dated November 18, 2014 concerning the Implementation of Integrated Governance for Financial Conglomerates;
3. POJK No. 45/POJK.03/2020 ("POJK 45/2020") dated October 16, 2020 concerning Financial Conglomerates;
4. SEOJK No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance (TKT) for Financial Conglomerates;
5. SEOJK No. 14/SEOJK.03/2015 ("SEOJK 14/2015") concerning the Implementation of Integrated Risk Management for Financial Conglomerates; and
6. Ministry of SOE Regulation No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.

Guided by applicable internal regulations and provisions, BNI is committed to realizing KK that grows healthily, prudently, and sustainably and has high competitiveness. For this reason, BNI has prepared TKT Guidelines, formed a TKT Committee, and added an integrated compliance function, an integrated internal audit function, and an integrated risk management function in BNI's governance organs. The Controlling Shareholder (PSP) has also appointed BNI as EU coordinator to assess BNI's KK risk management process.

SCOPE OF INTEGRATED RISK MANAGEMENT

BNI KK has implemented Integrated Risk Management comprehensively and effectively as regulated in POJK 17/2014. Guided by these regulations, BNI controls and manages KK risk exposure by referring to 4 (four) main pillars, which are briefly described as follows:

1. **Supervision of the Main Entity's Board of Directors and Board of Commissioners**
   The Main Entity's Board of Directors and Board of Commissioners are responsible for ensuring the implementation of Integrated Risk Management in the Financial Conglomeration. For this reason, the Board of Directors and Board of Commissioners of the Main Entity must understand the risks faced by the Financial Conglomerate, develop a Risk culture in the Financial Conglomeration, and ensure the implementation of Risk Management in each LJK in the Financial Conglomerate.

2. **Adequacy of Integrated Risk Management Policies, Procedures, and Limit Determination**
   Effective implementation of Integrated Risk Management must be supported by an Integrated Risk Management policy that is clearly defined by considering the level of risk to be taken (risk appetite) and risk tolerance in the Financial Conglomerate.

3. **Adequacy of the Integrated Risk Identification, Measurement, Monitoring, and Control Process, as well as the Integrated Risk Management Information System**
   Integrated risk identification, measurement, monitoring, and control are the main processes of implementing Integrated Risk Management. The Main Entity is obliged to carry out an integrated process of identifying, measuring, monitoring, and controlling risks for all material risk factors. Implementation of integrated risk identification, measurement, monitoring, and control processes must be supported, among others, by:
   1. Adequate Integrated Risk Management Information System; and
   2. Reports regarding the performance, financial condition, and risk exposure of the Financial Conglomerate and each LJK in the Financial Conglomerate.

4. **Comprehensive Internal Control System for the Implementation of Integrated Risk Management**
   The process of implementing effective Integrated Risk Management must be equipped with a comprehensive internal control system. The effective implementation of an internal control system is expected to safeguard the assets of the Financial Conglomerate, ensure the availability of reliable reporting, increase compliance with statutory provisions and regulations, and reduce the risk of losses, deviations, and violations of prudential aspects.

Implementing Integrated Risk Management in BNI's KK is important for knowing the risk exposure that will arise in integrated financial conglomerate activities. For this reason, the implementation of Integrated Risk Management needs to be carried out comprehensively, where at the supervision level the Board of Commissioners is assisted by the Integrated Governance Committee. In this case, BNI, as the EU, has performed the following things:

1. **Pillar I:**
   Supervision of the Main Entity's Board of Directors and Board of Commissioners, namely:
   a) Forming the BNI Financial Conglomeration Structure;
   b) Appoint a Director who oversees the Integrated Risk Management function;
   c) Establish an Integrated Risk Management Committee and an Integrated Risk Management Work Unit;
   d) Prepare a Corporate Charter that has been signed by the President Director/President Director of all LJK Members of the BNI Financial Conglomerate;
   e) Implement an Integrated Risk Management Committee (KMRT) at least 2 (two) times a year;
   f) The Board of Directors prepares a General Policy for Integrated Risk Management (KUMRT) and an Integrated Capital Policy and carries out a review at least once per year.
   g) The Board of Commissioners gives approval to the General Policy for Integrated Risk Management (KUMRT) and Integrated Capital Policy and carries out evaluations at least once per year; and
   h) Determine integrated risk appetite and risk tolerance in the BNI Financial Conglomerate.

2. **Pillar II:**
   Adequacy of Integrated Risk Management policies, procedures, and limits, namely:
   a) Prepare and review the General Policy for Integrated Risk Management (KUMRT) and Integrated Capital Management;
   b) Develop Integrated Risk Management Procedures including Intra-group Transaction Risk Management Procedures;
   c) Develop Integrated Risk Profile Assessment Procedures;
   d) Develop Integrated Capital Management Procedures; and
   e) Establish integrated risk limits and escalation mechanisms for exceeding limits.

3. **Pillar III:**
   Adequacy of integrated risk identification, measurement, monitoring, and control processes and integrated risk management information systems, namely:

a) Determine the Integrated Risk Profile methodology and carry out assessments every semester and report to the Financial Services Authority;
b) Determine the methodology for calculating the Integrated Capital Adequacy Ratio (CAR), carry out calculations every semester, and report to the Financial Services Authority;
c) Determine integrated risk appetite parameters and methodology, carry out quarterly monitoring, and report to the Director in charge of Integrated Risk Management;
d) Determine the parameters and methodology of Integrated Risk Limits, carry out monitoring every quarter, and report to the Director in charge of Integrated Risk Management;
e) Determine the parameters and methodology for the Leading Risk Indicator (LRI) assessment, carry out monthly monitoring, and report to the Director in charge of Integrated Risk Management;
f) Carrying out integrated stress testing of exchange rate volatility and interest rates at the BNI Financial Conglomerate; and
g) Developing a technology-based Integrated Risk Management Information System.

4. **Pillar IV**
   A comprehensive internal control system for the implementation of Integrated Risk Management, namely:
   a) Continuously disseminate Integrated Risk Management to all LJK Members of the BNI Financial Conglomerate; and
   b) Monitoring the implementation of Integrated Risk Management of all LJK members of the BNI Financial Conglomerate.

FINANCIAL CONGLOMERATE STRUCTURE AND OWNERSHIP STRUCTURE OF THE BNI FINANCIAL CONGLOMERATE

Based on the provisions of POJK 17/2014 and SEOJK 14/2015 concerning the Implementation of Integrated Risk Management for Financial Conglomerates, BNI stipulates that LJKs that are included in the implementation of Integrated Risk Management within the scope of BNI's KK include various types of businesses, including banks, insurance companies, reinsurance, securities companies, financing companies, and subsidiary companies. An explanation of the structure of the BNI business group, including the composition of share ownership, controlling shareholders, relationships with related companies, and Subsidiary Companies owned by BNI, can be described as follows:

1. **Legal entity that owns BNI**
   Based on the composition of share ownership, 60% of BNI's shares are owned by the Government of the Republic of Indonesia, while the remaining 40% is owned by the public. This public ownership consists of individual shareholders, domestic institutions, and foreign institutions. Ownership of the Government of the Republic of Indonesia is represented by the Ministry of SOE, while foreign public ownership is managed through foreign institutions. For domestic public ownership, it involves various entities such as mutual funds, pension funds, foundations, companies, and insurance, as well as ownership by individuals.

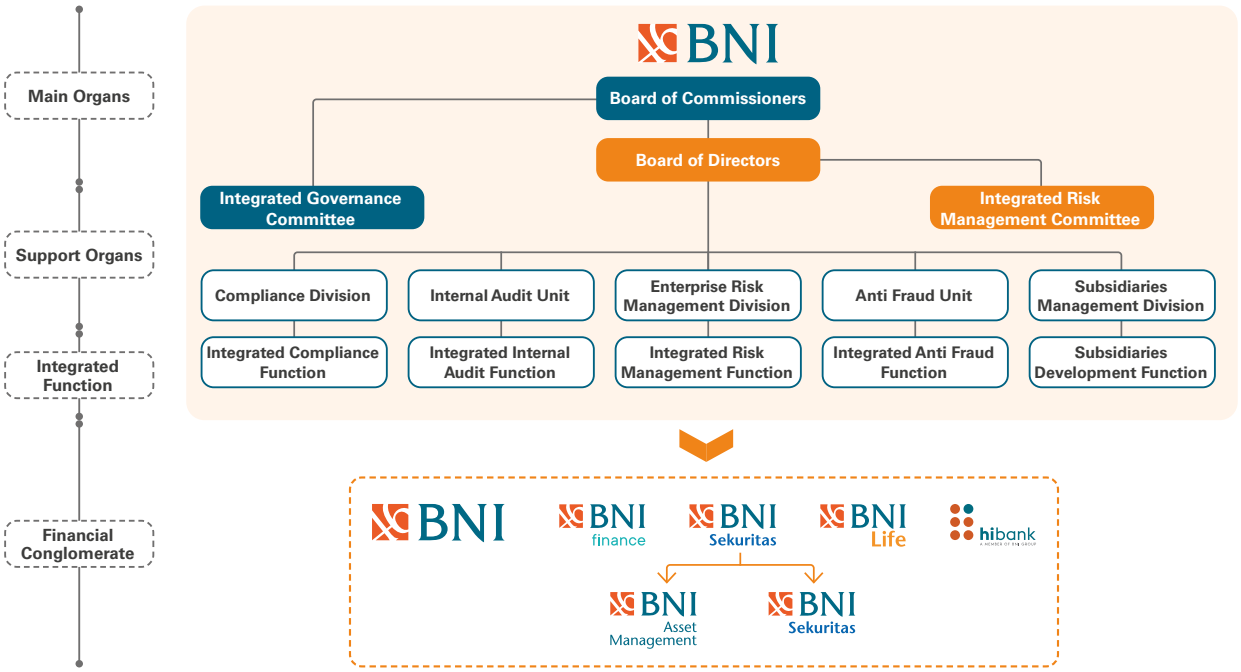
2. **Ultimate Shareholders**
   The majority shareholder of BNI is the Ministry of SOE, which acts as the representative of the Government of the Republic of Indonesia at the General Meeting of Shareholders (GMS) with ownership of 60%.

3. **Related Companies (Sister Company)**
   According to Article 4 POJK No. 17/POJK.03/2014, a related company (sister company) is a Financial Services Institution (LJK) that is institutionally or legally separate but is owned and/or controlled by the same controlling shareholder. BNI's main controlling shareholder is the Government of the Republic of Indonesia, which also controls several other state-owned companies in the financial services sector. However, according to POJK, relationships between LJKs that are directly owned by the Central Government are not considered a Financial Conglomerate. Therefore, Himbara banks are not included in the BNI sister company category.

4. **Subsidiary Company**
   BNI has majority ownership in six Subsidiary Companies, where BNI acts as the controlling entity. In addition, BNI also has minority ownership in five Financial Services Institutions (LJK) without a controlling role, as well as two subsidiary companies.

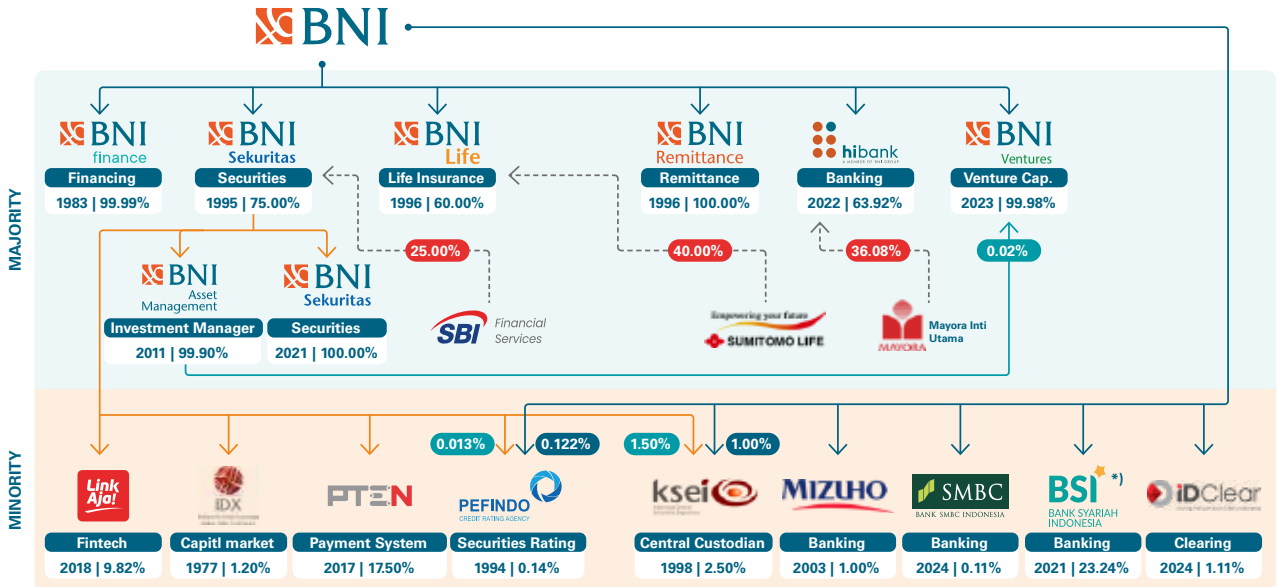
BNI's KK structure was designed by considering the suitability of the Subsidiary Company's type of business with OJK regulations and looking at the significance of BNI's capital participation in each entity incorporated as a member of BNI's LJK KK. Referring to Board of Directors' Letter No. DIR/401 dated June 2, 2022 concerning Members of the Financial Conglomerate of PT Bank Negara Indonesia (Persero)Tbk, the structure of BNI's KK as of December 31, 2024 is as follows:

BNI Financial Conglomeration



The following BNI KK structure chart describes the current entity position and share ownership in the BNI KK as of December 31, 2024:

BNI Corporate Group Structure



Notes:
- Investment by BNI
- Investment by BNI Sekuritas
- Investment by BNI Asset Management
- Investment by Strategic Partner
- Percentage of BNI Ownership
- Percentage of BNI Sekuritas Ownership
- Percentage of Strategic Partner Ownership

Notes:
*) In 2021, Bank BNI Syariah officially merged with 2 other Sharia Banks to become Bank Syariah Indonesia

In detail, information related to BNI's KK structure is as follows:

Entity Name	Entity Position in BNI Financial Conglomeration Structure	Line of Business	% Share Ownership	Address
PT Bank Negara Indonesia (Persero) Tbk	Main Entity (EU)	Commercial Bank	- Government: 60% - Public: 40%	Grha BNI Lantai 24 Jl. Jenderal Sudirman Kavling 1 Jakarta Pusat 10220
PT BNI Multifinance	Member of BNI Financial Conglomeration	Financing	- BNI: 99,99% - PT BNI Multifinance Employee Cooperative: 0.002%	Graha Binakarsa Lantai 11 Lot. E-F dan lantai 12 Jl. HR. Rasuna Said Kav. C-18 Kuningan, Jakarta Selatan 12940
PT BNI Life Insurance	Member of BNI Financial Conglomeration	Life Insurance Services	- BNI: 60% - Yayasan Danar Dana Swadharma (YDD): 0.000003% - BNI Employee Welfare Foundation: 0.000003% - Sumitomo Life Insurance Company: 39.999993%	Centennial Tower Lt. 10, Jl. Gatot Subroto Kav.24-25, Jakarta Selatan
PT BNI Sekuritas	Member of BNI Financial Conglomeration	Brokerage and Underwriter, including acting as an Investment Advisor.	- BNI: 75% - SBI Financial Services Co.Ltd: 25%	Sudirman Plaza Indofood Tower, Lantai 16 Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia
PT Bank Hibank Indonesia	Member of BNI Financial Conglomeration	Banking	- BNI: 63.92% - PT Mayora Inti Utama: 36.08%	Rajawali Place, Lantai 22-23 Jl. H.R. Rasuna Said Kav.B4 Setiabudi, Jakarta Selatan 12910
PT BNI Asset Management	Member of BNI Financial Conglomeration	Investment Manager	- PT BNI Sekuritas: 99.90% - PT BNI Sekuritas Employee Cooperative: 0.1%	Centennial Tower Lt. 19, Jl. Gatot Subroto Kav. 24-25, Jakarta Selatan
BNI Securities Pte Ltd	Member of BNI Financial Conglomeration	Brokerage Services, Underwriting, and Advisory Activities in the capital market	PT BNI Sekuritas: 100%	BNI Tower 30 Raffles Place, #26-01 Singapore, 048622

FULFILLMENT OF RISK MANAGEMENT ORGANS IN ACCORDANCE WITH THE CATEGORY AND CLASSIFICATION OF THE MINISTRY OF SOE

In accordance with the regulations of the Ministry of SOE, BNI, as a state-owned bank with Systemic A risk classification, also has additional responsibilities in implementing Integrated Risk Management Governance in accordance with the characteristics of financial conglomerates. In implementing consolidated and integrated risk management, BNI refers to SOE Ministerial Regulation No. 2/2023, which regulates that the obligation to fulfill risk management organs must be adjusted to the category and classification of SOE and SOE Subsidiaries with the provisions as described in the following table:

Risk Management Organ	Risk classification quadrant of SOEs and SOE Subsidiaries			
	Systemic A	Systemic B	Significant	Neutral
Board of Commissioners (Supervisory Board)	✔	✔	✔	✔
Board of Directors	✔	✔	✔	✔
Audit Committee	✔	✔	✔	✔
Risk Monitoring Committee	✔	✔	✔	Concurrently held by the Audit Committee

Risk Management Organ	Risk classification quadrant of SOEs and SOE Subsidiaries			
	Systemic A	Systemic B	Significant	Neutral
Integrated Governance Committee	✓	Concurrently held by Risk Monitoring Committee	Concurrently held by Risk Monitoring Committee	
Directors in Charge of Management	✓	✓	Concurrently held by the Director in charge of Financial Management	Concurrently held by the Director in charge of Financial Management
Board of Directors in charge of Financial Management	✓	✓	✓	✓
SPI (Internal Audit function)	✓	✓	✓	✓

BNI and Subsidiary Companies contained in the Financial Conglomerate Structure have fulfilled their obligations to fulfill risk management organs in accordance with the Risk Classification of each company based on the provisions of Minister of State-Owned Enterprises Regulation No. 2/2023. More detailed information is outlined in the table below:

Risk Management Organ	BNI (Systemic A)	BNIS (Systemic B)	BNIAM (Neutral)	BNIF (Neutral)	BNIL (Neutral)	HIBANK (Neutral)	BSPL (Neutral)
Board of Commissioners (Supervisory Board)	✓	✓	✓	✓	✓	✓	✓
Board of Directors	✓	✓	✓	✓	✓	✓	✓
Audit Committee	✓	✓	✓	✓	✓	✓	✓
Risk Monitoring Committee	✓	✓	✓	✓	✓	✓	✓
Integrated Governance Committee	✓	Independent Committee/Sharia Supervisory Board (PT BNI Life Insurance/"BNIL") as member of the BNI KTKT					
Board of Directors in charge of Risk Management	✓	✓	✓	✓	✓	✓	✓
Board of Directors in charge of Financial Management	✓	✓	✓	✓	✓	✓	✓
SPI (Internal Audit Function)	✓	✓	✓	✓	✓	✓	✓

BNI = PT Bank Negara Indonesia (Persero) Tbk
BNIS = PT BNI Sekuritas
BNIAM = PT BNI Asset Management
BNIF = PT BNI Multifinance
BNIL = PT BNI Life Insurance
HIBANK = PT Bank Hibank Indonesia
BSPL = BNI Securities Pte Ltd

MAIN PRINCIPLES OF INTEGRATED RISK PROFILE ASSESSMENT

In assessing the Integrated Risk profile, BNI pays attention to the main principles in the assessment process, which refer to SEOJK No. 14/2015, as follows:

1. **Risk Aggregation**
   Risk assessment is carried out by combining all risks within the Financial Conglomerate as a whole (risk aggregation), considering the impact they have on the overall condition of the conglomerate. This process includes identifying internal and external factors that have the potential to increase risk or influence the condition of the Financial Conglomerate, both now and in the future.
2. **Holistic**
   Risk assessment is carried out by considering the relationship between various risk factors (holistic approach), resulting in conclusions that provide a comprehensive picture of the risks faced by the Financial Conglomerate.
3. **Significance/Materiality and Proportionality**
   Risk assessments are carried out by considering the significance or materiality of risks proportionally within the Financial Conglomerate as a whole, including each Financial Services Institution (LJK) that is incorporated. This assessment is carried out by considering the structure, characteristics, and complexity of the Financial Conglomerate.

4. **Comprehensive and Structured**
   Risk assessment is carried out through in-depth analysis, which considers various assessment factors in a broad, complete, and comprehensive manner. This analysis process is supported by relevant facts and their impact on the risks and conditions of the Financial Conglomerate, considering the level and trends of existing problems. The assessment results are then presented in a structured manner, including facts, analysis results, and final conclusions regarding the risk assessment.

INTEGRATED RISK PROFILE ASSESSMENT RESULTS

On December 31, 2024, the results of the assessment of ten types of risk showed that the Integrated Risk Profile received a rating of 2 (Low to Moderate), with an Inherent Risk Rating at the Low to Moderate level. The assessment of the Quality of BNI's Integrated Risk Management Implementation (KPMR) recorded Satisfactory results. A more detailed explanation has been outlined in the discussion of Integrated Risk Profiles on page 511.

External Audit [ACGS: C.6]

In order to carry out its independent oversight function on financial aspects, BNI appoints a Public Accounting Firm (KAP) to examine interim and annual financial reports for both BNI individually and consolidated with Subsidiaries. The KAP selection process is carried out in accordance with the procurement mechanism for goods and services applicable within the scope of BNI in 2024.

To ensure the quality and objectivity of the results of financial statement audits, it is ensured that the External Auditor appointed by the Bank has no conflict of interest with the Bank or with any level of Bank officials. Over the last two years, there have been no members of the Board of Directors, managerial staff, or BNI employees who are former employees or current signing partners of BNI's external auditors.

The external audit process is an important stage in efforts to realize good corporate governance, especially in the aspect of strengthening financial control. The involvement of external and independent parties is very necessary to ensure that the Bank's financial information has been prepared and presented in a quality manner so that it can express an opinion on the fairness of the Financial Statement. The external audit process for the 2024 financial year is carried out in accordance with the Public Accountant Professional Standards and the audit scope that has been determined and can be completed on time.

IMPLEMENTATION OF THE EXTERNAL AUDIT FUNCTION

The implementation of audit activities within BNI is not only carried out by internal auditors through SAI but also involves external auditors who have competence and expertise in the field of accounting and auditing, such as the Financial Services Authority (OJK), Bank Indonesia (BI), the Audit Board of Indonesia (BPK), and the Public Accounting Firm (KAP).

In 2024, BNI was audited by several external institutions, such as Bank Indonesia (BI), Financial Services Authority (OJK), Audit Board of Indonesia (BPK), Center for Financial Transaction Reports and Analysis (PPATK), and Public Accounting Firm (KAP).

APPOINTMENT OF PUBLIC ACCOUNTING FIRM (KAP)

In order to fulfill the implementation of the external audit function in accordance with the provisions of POJK Number 9 of 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities and SE OJK Number 18/SEOJK.03/2023 concerning Procedures for Using Public Accounting Services in Financial Services Activities, BNI has carried out an audit of the Bank's Financial Statement for the 2024 financial year, which was carried out by an independent, competent, professional and objective Public Accountant (AP) and Public Accounting Firm (KAP) in accordance with the Public Accountant Professional Standards, as well as the work agreement and audit scope that have been determined.

BNI determined selected APs and KAPs to examine the Bank's financial statements for the 2024 financial year through holding an Annual GMS held on March 4, 2024, by considering recommendations from the Board of Commissioners and Audit Committee. The selection process has also been carried out in accordance with POJK Number 9 of 2023, SE OJK Number 18/SEOJK.03/2023, and internal Bank regulations to guarantee the independence and quality of audit results from the appointed AP and KAP. Following up on the results of the 2024 AGMS resolution, the Board of Commissioners decided to reappoint KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner, and is a member firm of the PricewaterhouseCoopers network) as an external auditor to examine the Consolidated Financial Statement, Micro and Small Business Funding Program Financial Statement, and other reports for the 2024 Financial Year period. [ACGS: D.2.24]

The legal basis regarding the appointment and determination of KAP within the scope of BNI is as follows:

1. POJK No. 9 of 2023 dated July 11, 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities in Chapter III, Restrictions on the Use of Audit Services Article 7, paragraph 1, states that parties in the form of commercial banks, issuers, and public companies are obliged to limit the use

of audit services on annual historical financial information from the same AP for 7 (seven) cumulative years;
2. POJK No. 37/POJK.03/2019 concerning Transparency and Publication of Financial Statements and SEOJK No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports.
3. The process of appointing KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner, and is a member firm of the PricewaterhouseCoopers network) as an external auditor is carried out through a "Tender" mechanism.
4. Via Letter from Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network) No. OL202408160010/JPA/JPA submitted to the Board of Commissioners on August 16, 2024, it was informed that effective May 15, 2024, KAP TWRR has changed its name to Rintis, Jumadi, Rianto & Partner Public Accounting Firm (a member firm of the PricewaterhouseCoopers network)/KAP RJRR.

Coordination of External Auditors and Audit Committee

To support the smoothness and effectiveness of the audit process, the Bank through the Audit Committee maintains active communication with external auditors regarding the audit implementation plan as well as the audit methodology and audit samples that will be requested from the IAD, discussing audit progress, and other important issues that BNI Management needs to know. Throughout the audit period, the Audit Committee and IAD also continue to supervise and ensure the smoothness and conformity of the implementation of the external audit process with applicable regulations as well as evaluating the quality of the audit process. The Bank is committed to maintaining good communication with Public Accountants to minimize obstacles that occur during the audit process. The results of coordination between the Audit Committee and the External Auditor have been contained in the 2024 Audit Committee Report.

As a form of follow-up to the results of the audit report submitted by the external auditor, the Audit Committee carries out a supervisory role by evaluating the actions taken by BNI Management based on the audit results. In addition, the Audit Committee also carries out a monitoring function to ensure that recommendations from external auditors are implemented in a timely manner and in accordance with applicable governance standards. This monitoring function also aims to minimize risks and ensure that the corrective steps taken by Management are in accordance with Bank policies and applicable regulations. Audit results reports are submitted to OJK in accordance with applicable laws and regulations.

Effectiveness of External Audit Implementation

In accordance with its role and authority, the BNI Audit Committee ensures that all stages of external audit implementation carried out by AP and/or KAP always run according to established standards. By continuing to maintain transparent and collaborative communication with the AP and/or KAP, the Audit Committee opens a discussion space to discuss matters of concern to the Audit Committee before the audit process begins and, of course, also evaluates the implementation of the audit by the AP and/or KAP after the audit process is completed, and then the results are submitted to the OJK.

In 2024, the Audit Committee has carried out an evaluation of the implementation of audit services for annual historical financial information by AP and/or KAP, which includes at least:
a. Conformity of Audit Implementation by AP and/or KAP with applicable Audit Standards;
b. Sufficiency of Field Work Time;
c. Assessment of the Scope of Services Provided and the Adequacy of Sampling Test; and
d. Recommendations for Improvements Provided by AP and/or KAP.

Supervision and monitoring activities on the performance of AP and/or KAP are discussed with the Board of Directors through Audit Committee meetings attended by SAI and the relevant Directors. During the meeting, the follow-up to audit findings by AP and/or KAP was also discussed so that, with the coordination carried out, comprehensive and optimal audit results could be provided.

The report on the results of the Audit Committee's evaluation was submitted by the BNI Board of Directors using the form contained in the attachment to SE OJK No. 18/SEOJK.13/2023 concerning Procedures for Using Public Accounting Services and Public Accounting Firms in Financial Services Activities and signed by the Audit Committee on May 20, 2024.

Bank Compliance with Provisions Regarding the Relationship between Banks, Public Accountants, and OJK

In carrying out the audit, BNI ensures that the Bank maintains compliance with the provisions regarding the relationship mechanism that exists between the Bank, Public Accountants, and the OJK. In addition, BNI also complies with applicable regulations regarding supervision and reporting to the OJK

with the aim of improving the quality of corporate governance and maintaining financial system stability.

The Bank's efforts to increase the effectiveness of external audit implementation and BNI's compliance with provisions relating to the relationship between banks, public accountants, and Bank Indonesia are realized through the following steps:

1. POJK No. 9 of 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities states that:
   a. Banks are required to use APs and KAPs that are registered and listed on the list of active APs and KAPs at the OJK
   b. Banks are required to limit the use of audit services for annual historical financial information from the same AP for 7 (seven) cumulative years.
2. Through Board of Commissioners Letter No. DK/16 dated February 22, 2024, BNI appointed KAP Rintis, Jumadi, Rianto & Partner as external auditors to audit BNI's Financial Statements and other reports for the 2024 financial year.
3. The appointment of a Public Accountant and/or the same Public Accounting Firm by BNI must be based on a clear and transparent work agreement.
4. Public Accountants who carry out audits of Bank Annual Financial Statements are required to carry out audits in accordance with the Professional Standards for Public Accountants and the provisions of work agreements, as well as the established audit scope. In addition, Public Accountants and/or Public Accounting Firms are required to maintain the confidentiality of Bank information in accordance with Law No. 7 of 1992 concerning Banking as amended by Law Number 4 of 2023 concerning the Development and Strengthening of the Financial Sector.
5. For the preparation and implementation of an audit of annual historical financial information for the Bank, the KAP is required to communicate with the OJK in the event that the KAP may request information from the OJK regarding the Bank and/or the OJK can inform the KAP about matters that need to be paid attention to in preparing and carrying out audits.
6. KAP is obliged to submit information requested by the OJK even though the work agreement has ended.

Public Accounting Firm Company Profile

Rintis, Jumadi, Rianto & Partner Accounting Firm (a member firm of the PricewaterhouseCoopers network)/KAP RJRR. WTC 3,
Jl. Jend. Sudirman Kav. 29-31 Jakarta 12920
INDONESIA

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Information regarding the change in KAP's name was received by the Bank on June 10, 2024, via a letter No. OL202406100009/JPA/JPA dated 10 June, 2024, sent by the Rintis, Jumadi, Rianto & Partner Public Accounting Firm (a member firm of the PricewaterhouseCoopers network)/KAP RJRR. In the letter, it is explained that the change in KAP's name is only limited to the name, without any change in the composition of Public Accountants, and KAP continues to operate as a member firm of the PricewaterhouseCoopers network. The change in KAP's name has had no material impact on BNI's operational, legal, or financial condition or business continuity, and related information has been reported to the regulator.

Public Accounting Firm, Name of Public Accountant, Fees, and Audit Opinion [ACGS C.6.1]

A complete explanation regarding the Public Accounting Firm, the name of the Public Accountant, fees, KAP permits, and audit opinions on BNI's annual financial statements for the last 5 (five) years is presented in the following table:

Year	Public Accounting Firm	Name of Accountant (Partner in Charge)	Period of Assignment	Audit Service Fee (Rupiah)*	KAP Permit	Audit Opinion
2024	KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner and is a member firm of the PricewaterhouseCoopers network)	Jimmy Pangestu S.E., CPA	1 year	22,800,000,000	315/KM.1/2024	Unqualified

Year	Public Accounting Firm	Name of Accountant (Partner in Charge)	Period of Assignment	Audit Service Fee (Rupiah)*	KAP Permit	Audit Opinion
2023	KAP Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network)	Drs. M. Jusuf Wibisana M.Ec,. CPA	1 year	20,672,000,000	241/KM.1/2015	Unqualified
2022	KAP Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network)	Drs. M. Jusuf Wibisana, M.Ec,. CPA	1 year and Interim	25,550,000,000	241/KM.1/2015	Unqualified
2021	KAP Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network)	Drs. M. Jusuf Wibisana, M.Ec,. CPA	1 year and Interim	22,175,000,000	241/KM.1/2015	Unqualified
2020	KAP Purwantono, Sungkoro and Surja (member firm of the Ernst and Young network)	Muhammad Kurniawan	1 year	12,650,000,000	603/KM.1/2015	Unqualified

*) Fees include OPE, VAT (11% in 2024 and 10% in previous years), and other taxes

The following is the scope of audit work for KAP Rintis, Jumadi, Rianto & Partner (a member firm of the PricewaterhouseCoopers network) for the 2024 financial year:

No	Assignment Type	Total (Rp) including VAT 11% & OPE
1.a	Audit of the consolidated financial statements of PT Bank Negara Indonesia (Persero) Tbk	15,473,947,777
1.b	Management Letter	111,774,261
1.c	Review and validation of consolidated financial statements of PT Bank Negara Indonesia (Persero) Tbk (newspaper format)	57,189,578
SUBTOTAL		**15,642,911,616**
2	Audit of the Micro and Small Business Funding Program ("PUMK")	364,769,432
3	Audit of financial statements and portfolios of Financial Institution Pension Funds	199,050,225
4	Report on the review of the policies and control procedures implemented by the Bank in providing custodial services based on mutually agreed procedures	193,600,239
5	Report on the results of performance evaluation based on mutually agreed procedures	193,600,239
6	Audit of compliance with statutory and internal regulations and financial controls (PSA 62)	352,497,988
7	Implementation of mutually agreed procedures regarding Management Contracts and Annual Management Contracts for SOE Board of Directors	514,517,935
8	Implementation of mutually agreed procedures regarding the Performance Realization Report for the Long-Term Incentives (LTI) Performance Targets of the Board of Directors and Board of Commissioners	77,383,945
9	Implementation of mutually agreed procedures regarding the SOE Aggregation Financial Statement for the 2023 Financial Year	540,966,516
SUBTOTAL		**2,436,386,519**
10	Audit of PT BNI Life Insurance ("BNI Life") Financial Statements	1,393,849,583
11	Audit of PT BNI Sekuritas Financial Statements	575,783,487
12	Audit of PT BNI Asset Management Financial Statements (including Agreed Upon Procedures ("AUP") MKBD)	371,084,572
13	Audit of PT BNI Multifinance Financial Statements	482,132,043
14	Audit of PT Bank Hibank Indonesia's Financial Statements	1,457,821,243
15	Audit of PT BNI Capital Ventura Financial Statements	440,030,937
SUBTOTAL		**4,720,701,865**
TOTAL		**22,800,000,000**

Audit Result

The results of the audit carried out by the external auditor are submitted in the form of a Consolidated Financial Statement Audit Opinion. The Consolidated Financial Statements of PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries have been audited by KAP Rintis, Jumadi, Rianto & Partner (a member firm of the PricewaterhouseCoopers network) with the responsible partner being Jimmy Pangestu, S.E., CPA, independent auditor, based on the Audit Standards set by the Indonesian Institute of Public Accountants, with an opinion without modification, as stated in its report dated January 22, 2025.

Fees for Audit Services and Other Services Provided by KAP Rintis, Jumadi, Rianto & Partners (formerly KAP Tanudiredja, Wibisana, Rintis & Partners) and Member Firms of the PricewaterhouseCoopers Network [ACGS C.6.1]

Throughout 2024, the fees for audit services and other services provided by KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner) and Member Firms of the PricewaterhouseCoopers Network are as follows:

No	Assignment Type	Amount (Rp) including VAT & OPE
1	Group reporting on The Hong Kong Branch of PT Bank Negara Indonesia (Persero) Tbk ("BNI Hong Kong")	983,744,304
2	Group reporting on The Tokyo Branch of PT Bank Negara Indonesia (Persero) Tbk ("BNI Tokyo")	2,471,040,000
3	Audit of financial statements of The Seoul Branch of PT Bank Negara Indonesia (Persero) Tbk ("BNI Seoul")	1,133,860,000
4	Audit of financial statements and group reporting of The Singapore Branch of PT Bank Negara Indonesia (Persero) Tbk ("BNI Singapore")	4,485,000,000
5	Group reporting on The London Branch of PT Bank Negara Indonesia (Persero) Tbk ("BNI London")	515,000,000
6	Group reporting on The New York Branch of PT Bank Negara Indonesia (Persero) Tbk ("BNI New York")	1,026,750,000
	Subtotal	**10,615,394,304**
7	Limited Review BNI Position June 30, 2024 and for the 6 (Six) Months Period Ended on that Date	10,875,000,000
8	Issuance of BNI Global Bonds Year 2024	4,460,000,000
9	IFRS 17 Proactive Assurance on Technical Paper Review and BRD/FSD	1,000,000,000
10	Non-Audit Assurance Engagement ("NAAE") on Net Adjusted Working Capital Report (MKBD) of PT BNI Sekuritas	55,000,000
Subtotal		**16,390,000,000**
Total		**27,005,394,304**

The total costs incurred by BNI for non-audit services were recorded to be lower than the costs for audit services incurred in 2024. [ACGS: C.6.2]

Legal Cases

NUMBER OF LEGAL CASES FACED BY THE BANK IN 2024

Throughout 2024, BNI faced several legal issues, including civil cases accompanied by claims for payment/compensation against BNI, criminal cases that have entered the trial process, and tax cases, both those that have been resolved with permanent legal force (inkracht) and those still in the process of settlement, as follows:

Case Settlement Status	Number of Cases		
	Civil	Criminal	Tax
The case is settled and has permanent legal force	96	6	1
Cases under settlement process	296	6	0
Number of Legal Cases in 2024	**392**	**12**	**1**

SIGNIFICANT LEGAL CASES FACED BY THE BANK IN 2024

Civil Litigation

Based on the table above, there are several significant civil cases faced by BNI, with the following details:

No.	Case	Main Case	Case Status	Risks and Impacts Faced by the Bank	Bank Management Efforts	Sanctions Imposed by the Authority	Case Value
1.	Case No. 204/Pdt.G/2020/PN.Amb Between: Plaintiffs: 1. Imran Laisouw 2. Sitti Laila Latuapo, S.P. 3. Risman 4. Suriani 5. Faisal Kotalima Versus: Defendant: BNI	A lawsuit for unlawful acts related to alleged negligence by BNI, which resulted in the embezzlement of customer funds carried out by a BNI employee who has been found guilty of committing a criminal offense based on a court verdict.	The case has been concluded at the Judicial Review level at the Supreme Court of the Republic of Indonesia.	BNI was ordered to pay the material claim amount; however, it has no significant impact on BNI	BNI has made the payment in accordance with the court verdict on January 31, 2024.	None -	Material: IDR 2,866,250,000 Immaterial: -

No.	Case	Main Case	Case Status	Risks and Impacts Faced by the Bank	Bank Management Efforts	Sanctions Imposed by the Authority	Case Value
2.	2. Case No. 112/ Pdt.G/2021/ PN.Amb Between: Plaintiffs: 1. Johny Widjaya 2. Elya Puspita 3. Jovelin Jaguenetta Widjaja 4. Fajar Madya 5. Muhamad La Bawe 6. Dustin Fendi Earja 7. Edwin Dorsalam Versus: Defendant: BNI	The case concerns a lawsuit for unlawful actions related to BNI's alleged negligence, which led to the embezzlement of customer funds by a BNI employee who was convicted of a criminal offense by the court.	The case has been concluded at the Supreme Court level following a Judicial Review.	BNI was ordered to pay an amount of Rp115.3 million as per the Judicial Review ruling. However, the impact on BNI has been minimal.	BNI will comply with the terms of the Judicial Review ruling.	None	Materiil: Rp29,777,316,513,- Immateriil: -
3.	Case No. 776/ Pdt.G/2020/ PN.Jkt.Brt Between: Plaintiff: Opap Investment Limited Versus: Defendants: 1. Hendrian Baehaki 2. Bayu Andriana 3. Nurul Ainulia, A.Md. aka Iren 4. M. Deni Setiawan 5. Irfan Maulana 6. BNI Co-Defendant: 1. Financial Services Authority, Central Reporting and Analysis of Financial Transactions	The case concerns an unlawful act lawsuit related to the alleged failure of BNI to apply the principle of prudence in identifying and verifying the opening of accounts by Defendant I and Defendant II in the name of CV Opap Investment Limited. Additionally, BNI is accused of not fulfilling its obligation to monitor and report suspicious financial transactions in the account under the name of CV Opap Investment Limited.	The case has been concluded at the Supreme Court level following the Kasasi (Judicial Review).	There is no risk or impact faced by BNI, as the Supreme Court's ruling in the Cassation stated that the plaintiff's lawsuit was inadmissible and has become legally binding (inkracht).	BNI has fully participated in the legal process and was declared victorious in accordance with the Supreme Court's Cassation ruling.	None	Materiil: €6,900,000,- Immateriil: Rp500,000,000,000,-

No.	Case	Main Case	Case Status	Risks and Impacts Faced by the Bank	Bank Management Efforts	Sanctions Imposed by the Authority	Case Value
4.	Case No. 471/Pdt.G/2021/PN.Mks Between: Plaintiffs: 1. Hendrik 2. Heng Pao Tek Versus: Defendant: BNI	The lawsuit is based on unlawful acts because BNI rejected the request for the liquidation of deposits in the name of the plaintiffs, where there is a suspected forgery of the deposit slip allegedly committed by an employee of BNI, which has been reported as a criminal case by BNI.	The case has been concluded at the Cassation level in the Supreme Court of the Republic of Indonesia.	There are no risks or impacts faced by BNI, as the Cassation Decision essentially ruled that the plaintiff's lawsuit was inadmissible and has become legally binding (inkracht).	BNI has fully participated in the court proceedings and was declared victorious according to the Supreme Court's Cassation ruling.	None	Materiil: Rp16,250,000,000-, Immateriil: -
5.	Case No. 220/Pdt.G/2023/PN.Mnd Between: Plaintiff: John Hamenda Versus: Defendants: 1. BNI Kebayoran Baru Branch 2. BNI Head Office 3. BPN North Sulawesi Province 4. Head of the Manado Land Office Co-Defendants: 1. Dirtipideksus National Police 2. Head of the South Jakarta District Attorney's Office 3. Mrs. Malputongekel 4. Bank Danamon Manado Branch 5. Bank Danamon Jakarta Regional Office 6. Notary PPAT Thelma Andries, S.H.	A lawsuit for unlawful acts against BNI for blocking and placing a sign on a disputed property located on Jalan 17 Agustus, Bumi Beringin Village, Wenang District, Manado City, with ownership evidence in the form of SHM No. 206/Bumi Beringin, dated June 20, 1995, in the name of John Hamenda.	At the First Instance in the District Court and the Appeal level in the High Court, the plaintiff's lawsuit was declared inadmissible. It is currently under examination at the Cassation level in the Supreme Court of the Republic of Indonesia.	Currently, there is no risk of reputational damage or compensation payment in accordance with the court ruling at the appeal level in the High Court.	BNI has submitted a Cassation Counter-Memorandum supporting its position and is currently awaiting the Cassation Decision.	None	Material: IDR 572,500,000,000 Immaterial: IDR 1,000,000,000,000

No.	Case	Main Case	Case Status	Risks and Impacts Faced by the Bank	Bank Management Efforts	Sanctions Imposed by the Authority	Case Value
6.	Case No. 740/Pdt.G/2023/PN.Jkt.Pst Between: Plaintiff: PT Zeus Citra International Versus: Defendant: BNI Co-Defendants: 1. State Property and Auction Service Office (KPKNL) Jakarta III 2. PT Bali Auction House	A lawsuit for unlawful acts due to BNI's rejection of the plaintiff's request for additional credit facilities and the plaintiff's objection to the auction conducted by BNI, which resulted in losses for the plaintiff.	At the First Instance in the District Court and the Appeal level in the High Court, the plaintiff's lawsuit was declared inadmissible. It is currently under examination at the Cassation level in the Supreme Court of the Republic of Indonesia.	Currently, there is no risk of compensation payment in accordance with the court ruling at the appeal level in the High Court.	BNI has submitted a Cassation Counter-Memorandum supporting BNI's position and is currently awaiting the Cassation Decision.	None	Material: IDR 1,392,731,803,391 Immaterial: IDR 500,000,000,000

Throughout 2024, BNI did not face significant risks related to legal issues, and based on the 2024 legal risk profile assessment, it was ranked at level 1 (low).

Criminal Cases

During 2024, BNI reported cases involving customers, employees, or other third parties, including cases of alleged criminal acts such as embezzlement, embezzlement in office, fraud, forgery, money laundering, cybercrime, banking crimes, and corruption. However, no significant criminal cases were faced by BNI.

TAX LITIGATION

No.	Case	Principal Case	Status	Risks and Impacts Faced by the Bank	Efforts by the Bank Management	Sanctions that Imposed by Authority	Case Value
1.	Case No. 007718.15/2019/PP Between: Appellant: BNI Against Respondent: Directorate General of Taxes	The Directorate General of Taxes has issued a Tax Underpayment Assessment Letter to the Bank regarding the correction of Corporate Income Tax rates for the 2015 tax year, including issues related to interest income from Non-Performing Loans (NPL) and the expense of receivables that are clearly uncollectible.	The case has been concluded at the level of Judicial Review at the Supreme Court of Indonesia, with the ruling affirming the Tax Court's decision.	The risk of payment for the corporate income tax shortfall for the 2015 tax year, as per the Court's ruling, amounts to IDR 625.8 billion. However, this has not had a significant impact on BNI.	BNI has made the payment for the corporate income tax shortfall for the 2015 tax year in accordance with the ruling of the Judicial Review decision.	none	Material: IDR 1,212,516,578,432.00 Immaterial: -

LEGAL CASES INVOLVING MEMBERS OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS

All serving members of BNI's Board of Commissioners and the Board of Directors during 2024 have never been implicated or involved in any civil or criminal cases and/or disputes.

LEGAL CASES FACED BY SUBSIDIARIES IN 2024

In 2024, legal issues encountered by BNI's subsidiaries, encompassing civil, criminal, and tax cases, are detailed in the table below:

Subsidiaries	Case Settlement Status	Number of Cases	
		Civil	Criminal
PT BNI Life Insurance	The case is settled and has permanent legal force	13	3
	Cases under settlement process	11	5
	Total Number of Cases	**24**	**8**
PT BNI Sekuritas	The case is settled and has permanent legal force	1	-
	Cases under settlement process	-	-
	Total Number of Cases	**1**	**-**
PT BNI Asset Management	The case is settled and has permanent legal force	-	-
	Cases under settlement process	1	-
	Total Number of Cases	**1**	**-**
PT BNI Multifinance	The case is settled and has permanent legal force	5	4
	Cases under settlement process	6	18
	Total Number of Cases	**11**	**22**
PT Bank Hibank Indonesia	The case is settled and has permanent legal force	3	-
	Cases under settlement process	4	-
	Total Number of Cases	**7**	-
PT BNI Modal Ventura	The case is settled and has permanent legal force	-	-
	Cases under settlement process	-	-
	Total Number of Cases	**-**	**-**

LEGAL CASES FACED BY MEMBERS OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS OF BNI'S SUBSIDIARIES

All serving members of the Board of Commissioners and the Board of Directors of BNI's subsidiaries in 2024 have never been involved or implicated in any civil and/or criminal cases and/or disputes.

IMPACT OF LEGAL ISSUES ON THE BANK AND ITS SUBSIDIARIES

The legal issues encountered in 2024 have not had any material impact on the status, position, or continuity of operations for BNI and its subsidiaries. Despite some legal matters, BNI has successfully maintained operational stability and resolved issues in compliance with regulations, without disrupting business activities. This reflects BNI's resilience and commitment to effectively managing legal risks.

EFFORTS TO MINIMIZE LEGAL RISKS

BNI consistently strives to minimize legal risks that may arise from its business activities through several measures, including:

1. Strengthening procedures, policies, agreements, and legal issue management for optimal risk management, protecting the Bank's interests at the pre-transaction, transaction, and post-transaction stages of business activities.
2. Optimizing the legal function in providing legal reviews for credit submissions decided by the Credit Committee to ensure that credit transactions are conducted prudently from a legal perspective, improving credit quality, and supporting business target achievement.

3. Enhancing the role of the legal units at the Head Office and Regional Offices in supporting the smooth business and operational activities of the entire Bank organization.
4. Regularly updating standard legal documentation, such as credit agreements and accessory agreements, to anticipate legal risks resulting from contractual weaknesses and protect the Bank's legal interests.
5. Maximizing efforts to minimize legal risks within business units, including fraud prevention, through preventive measures such as increasing employee legal awareness through legal discussions, education, webinars, and sharing sessions on legal issues.
6. Collaborating with reputable external legal consultants, senior advisors, and State Attorney Lawyers (JPN) to optimize legal advice and assistance in protecting the Bank's legal interests.
7. Enhancing the competencies of legal staff at the Head Office and Regional Offices in providing legal advice and handling cases to create a professional, reliable legal team that supports the Bank's transformation.

LEGAL VIOLATIONS RELATED TO EMPLOYMENT, CONSUMERS, BANKRUPTCY, COMMERCIAL ISSUES, COMPETITION, AND/OR ENVIRONMENTAL MATTERS [ACGS: (P)B.1.1]

Throughout 2024, BNI has not committed any legal violations related to employment, consumers, bankruptcy, commercial matters, competition, and/or environmental issues.

Adminstrative Sanction

ADMINISTRATIVE SANCTIONS FROM THE FINANCIAL SERVICES AUTHORITY AND/OR OTHER REGULATORS

Throughout 2024, neither BNI nor any members of the Board of Directors and/or Board of Commissioners received administrative sanctions, whether material or non-material from the OJK or any other regulatory authority that could impact BNI's business continuity. Furthermore, BNI remained fully compliant with regulatory requirements and did not incur any sanctions related to delays or failures in disclosing material events within the stipulated timeframe.

The absence of administrative sanctions imposed on BNI in 2024 reflects the bank's strong commitment to adhering to all applicable regulations, including compliance with disclosure reporting requirements and proper record-keeping provisions.

ADMINISTRATIVE SANCTIONS RECEIVED BY MEMBERS OF THE BOARD OF DIRECTORS AND MEMBERS OF THE BOARD OF COMMISSIONERS OF BNI

Throughout 2024, none of the incumbent members of BNI's Board of Directors or Board of Commissioners received any administrative sanctions from the regulator.

ADMINISTRATIVE SANCTIONS RECEIVED BY MEMBERS OF THE BOARD OF DIRECTORS AND MEMBERS OF THE BOARD OF COMMISSIONERS OF SUBSIDIARIES

Throughout 2024, none of the incumbent members of the Board of Directors or Board of Commissioners of BNI's subsidiaries received any administrative sanctions from the regulator.

TAX SANCTIONS

BNI has settled all tax assessments resulting from audits that have become due, in full compliance with applicable regulations. As a result, BNI has no outstanding tax payment arrears.

Details regarding tax-related disputes can be found in the "Corporate Governance" chapter of this Annual Report.

Violations of Laws Related to Employment, Consumer, Bankruptcy, Commercial, Competition and/or Environmental Issues

Throughout 2024, BNI has no recorded violations related to employment, consumer protection, bankruptcy, commercial activities, competition, or environmental issues.

Access to Company Information and Data [ACGS C.7.1, C.7.2, C.7.3, C.7.4, C.10.1]

BNI continuously strives to foster effective communication with regulators, shareholders, customers, employees, business partners, and the wider public as part of its commitment to transparency and accountability towards stakeholders. The strong relationships established between the Bank and its stakeholders are governed by BNI's Communication Policy.

To enhance effective communication, BNI has an Investor Relations unit that plays a vital role in maintaining the Bank's reputation through interactive engagement with investors and analysts, ensuring the regular dissemination of information related to the Bank's performance. Through the Investor Relations Team, BNI facilitates easy access to company information and data for all stakeholders, providing insights into the Bank's financial and non-financial performance through various communication channels such as the website (available in both Indonesian and English), mass media, mailing lists, bulletins, analyst meetings, and the IDX website. These Investor Relations activities also serve as a key communication method with shareholders, in addition to the General Meeting of Shareholders (GMS).

Access to company information and data related to BNI's corporate actions can be obtained through:

BNI Official Website	Telephone	Facsimile	E-Mail
http://bni.co.id	021-5728387	021-5728053	ir@bni.co.id

PRESS RELEASE [ACGS C.7.4]

BNI recognizes the vital role of mass media in disseminating information about the Bank's journey, developments, and performance achievements. Therefore, BNI continuously strives to foster and maintain harmonious relationships with the media through various activities conducted regularly each year, including the distribution of press releases to the public as one of the Bank's top priorities.

In 2024, BNI has issued 277 press releases with the following details:

No.	Date	Title	Venue
1.	January 1, 2024	BNI Optimistic Transaction Business Performance Will Be Even More Brilliant in 2024	Jakarta
2.	January 2, 2024	BNI President Director Ready to Continue Positive Achievements in 2024	Jakarta
3.	January 4, 2024	Increasing MSMEs Go Global, BNI Shares Provide Halal Certification Assistance and On Boarding Training for 422 Culinary MSMEs	Jakarta
4		BNI Shares, Distributes Emergency Response Assistance for the Lewetobi Volcanic Eruption in Flores	Jakarta
5	January 5, 2024	Optimistic About Welcoming 2024, BNI Plans to Open 2 New Overseas Offices	Jakarta
6		Bright Prospects for 2024, BBNI Shares Soar to All Time High	Jakarta
7	January 8, 2024	SOE Minister Erick Thohir Appreciates BNI's Thematic Education Outlet Digitalization Program	Jakarta
8	January 9, 2024	BNI Xpora Supports Tropica Rattan MSMEs to Export to Europe, Japan and America	Jakarta
9		BNI AM Optimistic that the Indonesian Capital Market Will Record Positive Achievements This Year	Jakarta
10	January 11, 2024	BNI AM Presents Sharia Mutual Fund Product Innovations in BNI Mobile Banking	Jakarta
11	January 12, 2024	BNI and IPPAT Collaborate to Create Account-Based KTA	Jakarta
12		Supported by BNI Xpora, Cau Chocolates Successfully Reaches Global Market	Jakarta
13	January 14, 2024	Providing a Different Experience, BNI Inaugurates UI Depok Branch Office	Jakarta
14	January 17, 2024	Recording 7.5 Times Sales Growth in 2023, BNI Finance is Optimistic in Facing 2024	Jakarta
15	January 20, 2024	HABE Handicraft Products Successfully Penetrate Global Market	Jakarta

No.	Date	Title	Venue
16	January 22, 2024	Watch Out! Fake Lottery Using BNI's Name Targets Social Media Users	Jakarta
17		Increase Financial Literacy, BNI and OJK Invite Students to Get to Know the SiMuda Program	Jakarta
18	29 January 2024	Men's Doubles Win, BNI Appreciates the Achievements of Indonesian Badminton Athletes at the 2024 Indonesia Masters	Jakarta
19	January 30, 2024	Holding Indonesia Incorporated Day, the Indonesian Ministry of Foreign Affairs and BNI Encourage Collaboration of BUMN Go Global	Jakarta
20	January 31, 2024	Boosting the Local Product Market, BNI Provides Vending Machines for Fostered MSMEs	Jakarta
21	February 3, 2024	Ecovivo Develops Environmentally Friendly Shampoo and Soap Business	Jakarta
22		Supporting the Tomohon Visitor Center, BNI Proactively Realizes the Digitalization of the Tourism Ecosystem	Jakarta
23		Banana Stems Become a Valuable Commodity Abroad	Jakarta
24		Radja Nainggolan Attends Grasroot Football Day Bhayangkara Presisi Indonesia FC	Jakarta
25	February 5, 2024	Diaspora Bridge, BNI Successfully Brings Sidoarjo MSMEs to Export Cassava Chips	Jakarta
26	February 7, 2024	After Breaking ATH, BBNI Shares Can Reach IDR 6,000	Jakarta
27		Stock Price Increase Encourages BNI Records Largest Market Capitalization Value in Company History	Jakarta
28		Creating Digital Transaction Solutions, BNI Wins Best Banking API Solution in Indonesia Award	Jakarta
29	February 8, 2024	Holding Limited Services during Isra' Mi'raj and Chinese New Year Holidays, Here's BNI's Let's Go Hoki Promo	Jakarta
30	February 9, 2024	Improving Teacher Competence, BNI Distributes Thousands of Teacher Certifications	Jakarta
31	February 17, 2024	Appreciating Loyal Customers, BNI Holds 2024 Chinese New Year Customer Gathering	Jakarta
32	February 20, 2024	Legislators Appreciate BNI's Performance, as One of the Locomotives of the Indonesian Economy	Jakarta
33		Carrying the Green Building Concept, BNI Builds Offices in the PIK 2 Area	Jakarta
34	February 21, 2024	ITB Studium Generale, BNI President Director Encourages the Young Generation to Become Entrepreneurs	Jakarta
35	February 22, 2024	DPR Supports BNI's Overseas Expansion	Jakarta
36	February 23, 2024	BNI and Posind Collaborate on Distributing Non-Payroll Consumer Credit Facilities	Jakarta
37		Erick Thohir Appreciates BNI, Successfully Realizing Green Building Concept Offices in PIK 2	Jakarta
38	February 26, 2024	Consistency Makes BNI's Performance Grow Positively	Jakarta
39	February 28, 2024	Asset Management Launches Index Mutual Funds, BNI AM IDX PEFINDO PRIME BANK Completes Family Index Lineup	Jakarta
40		Supporting Inacraft 2024, BNI Encourages MSMEs to Go Global	Jakarta
41	February 29, 2024	BNI Distributes Financing to Indonesian Diaspora in Hong Kong	Jakarta
42	February 24, 2024	Supporting Hong Kong Diaspora Business, BNI Funds Our Village	Jakarta
43	February 25, 2024	Beware of Investment Fraud Cases and Illegal Loans, BNI and OJK. Financial Planning Education Holds	Jakarta
44	February 29, 2024	Futuristic and Environmentally Friendly Concept, BNI Presents New Building in IKN	Jakarta
45	March 4, 2024	Distributing 50% Dividends, BNI is Optimistic that Performance Will Be More Positive in 2024	Jakarta
46		BNI Wins Three ESG Awards	Jakarta
47	March 6, 2024	BNI Exporters Forum, Supports MSMEs to Penetrate the Global Market	Jakarta
48	March 7, 2024	BNI Wins Two Corporate Communication Awards at BCOMSS 2024	Jakarta
49	March 9, 2024	Welcoming Ramadan, BNI Prepares Various Interesting Promos for Customers	Jakarta
50	March 11, 2024	Inaugurated by Erick Thohir, BNI Distributes KUR and CSR to MSMEs in the Lambuang Bukittinggi Station Area	Jakarta
51	March 15, 2024	BNI Wins Marketeers OMNI Brand of The Year 2024 Award	Jakarta
52	March 17, 2024	3 Indonesian Representatives Reach the All England 2024 Finals, BNI Supports the Struggle of Athletes to Make History	Jakarta
53	March 18, 2024	PBSI Leads Indonesia to Win the All England Open 2024, BNI Gives Highest Appreciation	Jakarta
54	March 19, 2024	BNI Exporters Forum, Helps MSMEs Penetrate the American Market	Jakarta
55	March 23, 2024	BNI and ITS Surabaya Collaborate Intensify BNI Campus Financial Program	Jakarta
56	March 25, 2024	Supporting Energy Transition, BNI Funds PLTS Project	Jakarta

No.	Date	Title	Venue
57	March 26, 2024	2024 BUMN Ramadan Safari Held, Providing Cheap Basic Necessities to Free Homecoming	Jakarta
58		Ramadan Excitement, BNI and Unair Collaborate to Provide 1,000 Basic Necessity Packages	Jakarta
59	March 27, 2024	BNI Strengthens Synergy with TNI Through Integrated Financial Service Solutions	Jakarta
60		Meet Ramadan and Eid Needs, BNI Provides IDR26.6 Trillion in Cash	Jakarta
61	March 28, 2024	Diversifying Funding Sources, BNI Issues Global Bonds Worth USD 500 Million	Jakarta
62	March 31, 2024	Wonderful Ramadan, BNI Shares Authenticity on the Night of Nuzulul Qur'an	Jakarta
63	April 1, 2024	BNI Asset Management Index Mutual Funds Now Available in the Retail Market	Jakarta
64	April 4, 2024	BNI Global Bond Oversubscribed 6.4 Times, Proof of High Investor Trust	Jakarta
65	April 5, 2024	Funding Homecoming with BUMN, BNI Sends 4,200 Homecoming Travelers Home	Jakarta
66	April 5, 2024	BNI Xpora Brings Indonesian Coffee MSMEs to Amsterdam Coffee Festival 2024	Jakarta
67	April 6, 2024	BNI Ensures Services Ready to Welcome Eid al-Fitr 2024	Jakarta
68		Safe and Comfortable Homecoming, Many Attractive Discounts for Transactions Using BNI Tapcash	Jakarta
69		Welcoming Wonderful Eid, Here's BNI's Promo	Jakarta
70	April 7, 2024	BNI Shares Happiness in the Month of Ramadan, Starting from Providing Basic Necessities, Assistance to Free Homecoming	Jakarta
71	April 8, 2024	Worry-Free Eid Homecoming with BNI Cash Withdrawal Services	Jakarta
72		Worry-Free Eid Homecoming, Order and Buy Whoosh Tickets on BNI Mobile Banking	Jakarta
73	April 9, 2024	Sharing Kindness in the Month of Ramadan, BNI Holds Employee Volunteering to Clean and Help Mosque Facilities and Infrastructure	Jakarta
74	April 16, 2024	BNI Helps Specialty Coffee, a Product of Xpora's Fostered MSMEs, Penetrate the American Market	Jakarta
75	April 18, 2024	BNI Supports MSMEs to Penetrate the Singapore Market at the Exhibition. Indonesia in SG	Jakarta
76	April 20, 2024	Indonesia Wins All England and BAC, BNI Appreciates and Supports Thomas & Uber Cup Teams	Jakarta
77	April 24, 2024	BNI and UNDIP Establish Synergy to Strengthen Campus Financial Ecosystem	Jakarta
78	April 26, 2024	BNI and Telkomsel Strengthen Synergy Through Reciprocal Cooperation for Employees	Jakarta
79	April 30, 2024	hibank Participates in Enlivening the 2024 Sarga Festival	Jakarta
80	May 2, 2024	Supporting Energy Transition, BNI Funds Acquisition of Sidrap PLTB by Barito Group	Jakarta
81		Synergy Between BNI and UNUD, Providing Multifunction Student Cards	Jakarta
82	May 4, 2024	BNI Provides Business Financing Solutions Through Supply Chain Financing	Jakarta
83		Advancing to the Finals, BNI Appreciates the Success of the Indonesian Thomas and Uber Teams	Jakarta
84	May 5, 2024	Support from BUMN Makes Indonesian Sports Even More Prominent	Jakarta
85		BNI Java Jazz on The Move Specialty Edition Returns, Natasya Elvira to Fariz RM and Candra Darusman Ready to Enliven the Event	Jakarta
86		Showing Unyielding Struggle, BNI Appreciates the Thomas and Uber Teams	Jakarta
87	May 7, 2024	BNI Welcomes the Return of the Indonesian Thomas and Uber Teams to the Homeland	Jakarta
88	May 8, 2024	BNI Fully Supports Aldila to Achieve Her Dream of Winning the Grand Slam	Jakarta
89	May 14, 2024	Consistently Supporting SMMPTN-West 2024, BNI Collaborates with 25 PTN	Jakarta
90	May 15, 2024	BNI Strengthens Synergy with the Indonesian Army, Through the Provision of Integrated Financial Services	Jakarta
91	May 23, 2024	Presenting Wonderful Music Experiences, BNI Java Jazz Festival 2024 Held for 3 Days in Kemayoran	Jakarta
92	May 24, 2024	BNI Spreads Interesting Promos at BNI Java Jazz Festival 2024	Jakarta
93		BNI Java Jazz Festival 2024 Will Be Held Soon, Note the Best Route to the Location	Jakarta
94		Here is the Line Up for BNI Java Jazz Festival 2024, Which is Your Favorite?	Jakarta
95		BNI Java Jazz Festival 2024, More Than Just Music, Feel the wondrful Experience	Jakarta
96		Can Plastic Waste Be a Gift? Come on, Exchange at the BNI Java Jazz Festival 2024 Recycle Vending Machine	Jakarta
97	May 24, 2024	Erwin Gutawa, Ruth Sahanaya, and Incognito Amaze the Audience on the First Day of the BNI Java Jazz Festival 2024	Jakarta

No.	Date	Title	Venue
98	May 25, 2024	Barry Likumahuwa Appreciates BNI's Consistency in Organizing the BNI Java Jazz Festival 2024	Jakarta
99		BNI Java Jazz Festival 2024, the Most Prestigious and Anticipated Event for Music Lovers	Jakarta
100		BNI Agen46 Present at the Wondrous Booth of the BNI Java Jazz Festival 2024, Join the Excitement of the Games	Jakarta
102	May 26, 2024	BNI Java Jazz Festival 2024, a Stage Full of Stars on the Second Day	Jakarta
103		Ministry of Education, Culture, Research and Technology Appreciates and Supports the Implementation of the BNI Java Jazz Festival 2024	Jakarta
104		Snoh Aalegra, Tompi, and Andien Enliven the Peak of the BNI Java Jazz Festival 2024	Jakarta
105	May 27, 2024	Uniting Across Generations, the Ministry of SOEs Appreciates the BNI JJF Event 2024	Jakarta
106	May 28, 2024	Uniting Across Generations, Ministry of SOEs Appreciates BNI JJF 2024	Jakarta
107	May 29, 2024	BNI Java Jazz Festival 2024 Successfully Boosts BNI Digital Transactions	Jakarta
108	June 2, 2024	BNI Holds BNI Exporters Forum in Bandung Encourages SMEs to Penetrate Global Markets	Jakarta
109	June 3, 2024	BNI Invites Emerald Customers to Get to Know Environmentally Friendly Vehicles Closer	Jakarta
110	June 5, 2024	BNI Finance Director Wins "The Most Inspiring Women Leader" Award from CNBC Indonesia	Jakarta
111	June 7, 2024	BNI Becomes UMKM Catalyst Through Collaboration with Pupuk Indonesia Holding Company	Jakarta
112	June 8, 2024	BNI Ready to Spread Attractive Promos at the 2024 Jakarta Great Sale Festival	Jakarta
113	June 9, 2024	BNI and Emirates Hold Travel Fair for the Third Time, Offering Special Tickets and Promos	Jakarta
114	June 12, 2024	BNI Awards Performance Excellence Award (PEXA) 2024 to BNI Hi Movers with Achievements	Jakarta
115	June 14, 2024	BNI Xpora Sends 12 Food and Beverage SMEs to Indonesia in Korea - SFH 2024	Jakarta
116		BNI and Mastercard Introduce BNI Titanium Credit Cards for Millennials and Gen Z	Jakarta
117	June 15, 2024	BNI Opens Limited Services on Eid al-Adha 1445 H	Jakarta
118		Strengthening Financial Literacy and Inclusion, BNI Educates the Community on Waste Management	Jakarta
119	June 18, 2024	78th Anniversary, BNI Holds Empathy Drop Box Program Again	Jakarta
120	June 20, 2024	BNI Partners with Oppo, Provides Free VIP Tickets for UCL Final Match in England for BNI Private Customers	Jakarta
121	June 23, 2024	78th Anniversary, BNI Plants 78 Thousand Mangrove Seedlings in Teluk Pangpang	Jakarta
122	June 26, 2024	Encouraging MSME Growth, BNI Continues to Serve KUR and BWU Outside of Working Days	Jakarta
123	June 27, 2024	PT Bank Hibank Indonesia, Achieves Significant Increase in Embracing and Distributing Credit to MSMEs	Jakarta
124	June 29, 2024	BNI Accelerates Diaspora-Owned Businesses in Japan with Diaspora Loan	Jakarta
125	June 30, 2024	Welcoming 78th Anniversary, BNI Launches Special TapCash Card for Blackpink the Game	Jakarta
126		Holding Financial Education and Information Disclosure, BNI Introduces DigiRemit Application in Japan	Jakarta
127	July 2, 2024	BNI Presents Massive Promos and Discounts for 78th Anniversary	Jakarta
128	July 3, 2024	BNI Consistent Collaboration of UMKM Go Global Program	Jakarta
129	July 4, 2024	Providing the Best Service, BNI Wins 13 Infobank Banking Service Excellence Awards 2024	Jakarta
130	July 6, 2024	Hi-Movers Appreciation at the Peak of the 78th Anniversary Celebration, BNI Holds BNI Loudfest 2024 at GBK	Jakarta
131	July 7, 2024	BNI Loudfest vol-3 2024 Ends Lively, SUGBK Still Maintains All Its Facilities	Jakarta
132	July 10, 2024	BNI Inaugurates Integrated Service Unit at ITB, Strengthens Campus Financial Ecosystem	Jakarta
133	July 16, 2024	BNI Ventures Launches BNV Arcade, Strengthens Startup Ecosystem	Jakarta
134	July 17, 2024	Many Diaspora SMEs in Australia, Opening. BNI Sydney Branch Office Considered Potential	Jakarta
135	July 18, 2024	Pampering Generation Z and Millennial Customers, BNI Holds Emerald Private Golf Clinic Gen 2.0	Jakarta
136		DPR Commission VI Appreciates BNI's Performance and Commitment to Encourage MSMEs to Move Up a Class	Jakarta

No.	Date	Title	Venue
137	July 19, 2024	Encouraging MSMEs to Penetrate the Global Market, Customs and Excise Collaborate with BNI Xpora to Hold FGD UMKM Export Series in Denpasar	Jakarta
138		BNI Celebrates Its 78th Anniversary by Launching wondr by BNI and Holding BNI Expo 2024	Jakarta
139	July 21, 2024	BNI Reappointed as RDN Administrator and Payment Bank	Jakarta
140	July 22, 2024	BNI Xpora and KAI Services Collaborate to Increase Sales Opportunities for MSME Products at KAI Onboard Service	Jakarta
141		BNI and DJP Hold "Spectaxcular 2024" Tax Campaign, Calling for Strong Taxes, Healthy APBN	Jakarta
142	July 23, 2024	BNI Encourages East Java MSMEs to Penetrate the Global Market Through BEF in Surabaya	Jakarta
143		Developing the Campus Financial Ecosystem, BNI and Telkom University Collaborate to Create Integrated Payments	Jakarta
144		wondr by BNI Receives Appreciation from DPR Members	Jakarta
145		Commission VI DPR Appreciates BNI's Performance and Innovation Including wondr by BNI	Jakarta
146		BNI Xpora Wins SME Enabler of the Year 2024 Award from Marketeers Magazine	Jakarta
147	July 24, 2024	Kapolri Cup 2024 by BNI Celebrates Bhayangkara's 78th Anniversary	Jakarta
148		Bhayangkara's 78th Anniversary, BNI Supports Kapolri Cup Badminton Championship 2024	Jakarta
149	July 25, 2024	BNI Finance Records Financing of IDR 2.89 T in Semester 1 2024, Soaring 216%	Jakarta
150	July 27, 2024	BNI Firmly Combats Online Gambling	Jakarta
151	July 29, 2024	BNI Hopes the 2024 Kapolri Cup Badminton Championship Will Be an Event to Gather Athletes with Achievements	Jakarta
152		BNI and Indosat Collaborate to Provide Financial Services and Information Technology	Jakarta
153	July 30, 2024	hibank Supports Green Financing for Water Treatment Plant Project in Bekasi	Jakarta
154		Visit BNI Expo 2024, Find Easy and Exciting Ways to Own a Dream Home, Vehicle, or Picnic	Jakarta
155	July 31, 2024	Kapolri Cup Successfully Held, BNI Appreciates the Police	Jakarta
156		BNI Ciputra Golfpreneur Tournament 2024, Encourages Indonesian Athletes to World Level	Jakarta
157	August 2, 2024	Opening Today in BSD, BNI Expo 2024 Offers Attractive Promos and Enjoy a Wonderful Journey	Jakarta
158		BNI Securities Ready to Pamper Customers with Exclusive Promotions at BNI Expo 2024	Jakarta
159		Innovative and Dedicated, BNI and BNI Securities Win Awards at the Asian Banking & Finance Award	Jakarta
160	August 3, 2024	BNI Launches Credit Card Co-Branding with MAPCLUB	Jakarta
161	August 4, 2024	BNI Expo 2024 Becomes a Business Matching Event for MSMEs with International Buyers	Jakarta
162	August 4, 2024	Enlivening BNI Expo 2024, BNI Asset Management Invites the Public to Learn to Manage Finances	Jakarta
163	August 5, 2024	Celebrating BNI's 78th Anniversary, Thousands of Runners Join BNI Miles Tune 5K	Jakarta
164	August 6, 2024	BNI Expo 2024 Successfully Held, Tens of Thousands of Visitors Enjoy a Wonderful Journey	Jakarta
165	August 7, 2024	Penetrating the American Market, BNI Xpora Brings Fostered MSMEs to the Shoppe Object NYC 2024 Exhibition	Jakarta
166	August 13, 2024	President Jokowi Visits BNI Digital Banking Cafe, Access to Banking Services is Easier and More Convenient in IKN	Jakarta
167		BNI and Mercubuana University Collaborate to Improve the Campus Financial Ecosystem	Jakarta
168	August 14, 2024	BNI Holds Compliance Forum with the KPK, Improves Anti-Corruption Culture	Jakarta
169	August 15, 2024	BNI-UI Half Marathon 2024 Returns, Join the Excitement and Get Interesting Promos	Jakarta
170	August 15, 2024	BNI Enters the Ranks of the Largest Companies in Indonesia According to Fortune Indonesia 100	Jakarta
171	August 16, 2024	Go Global, BNI Xpora Sends 5 SMEs to HKTDC Food Expo 2024 in Hong Kong	Jakarta
172	August 17, 2024	BNI Xpora Holds BNI Exporters Forum in Makassar, Encourages SMEs to Go Global	Jakarta
173		BNI and OJK Educate IKN Construction Workers about the Dangers of Online Gambling	Jakarta
174	August 18, 2024	Commemorating National Housing Day 2024, BNI Supports Greening in IKN	Jakarta

No.	Date	Title	Venue
175	August 20, 2024	BNI Ciputra Golfpreneur Tournament 2024 Returns, Presenting Professional Golfers of Asian Level	Jakarta
176	August 21, 2024	BNI Supports Diaspora through Excellent Programs Through Overseas Office Networks	Jakarta
177	August 23, 2024	Actively Carrying Out Financial Literacy and Inclusion, BNI Wins Prestigious Award from OJK	Jakarta
178	August 24, 2024	BNI Supports Bluebird's Digital Business Transformation, Creating Future Mobility	Jakarta
179		BNI and Ciputra Collaborate in the 2024 Golfpreneur Tournament, Encouraging Indonesian Golfers to the World Stage	Jakarta
180	August 25, 2024	wondr by BNI Records 2 Million Downloads Since Launch, Becomes a Game Changer in Banking Industry	Jakarta
181	August 27, 2024	Making it Easier for Diaspora, BNI and Ministry of Foreign Affairs Collaborate on Indonesian Community Cards Abroad	Jakarta
182	August 29, 2024	Bazaar Fest Vol 3 Held for 3 Days, Filled with Promos wondr by BNI	Jakarta
183		BNI Brings wondr Application Globally, Introduced in Five International Financial Centers	Jakarta
184		BNI and Bappenas Strengthen Cooperation, Invite Employees to Use wondr by BNI	Jakarta
185	August 30, 2024	Need KUR But Limited Time? BNI Opens KUR and BWU Services on Holidays	Jakarta
186	September 1, 2024	Making Transactions More Exciting, Wondr by BNI Usage Increases by 200%	Jakarta
187	September 2, 2024	BNI Successfully Holds Bazaar Vol 3, Wondr by BNI Facilitates Visitor Transactions	Jakarta
188	September 3, 2024	BNI Supports Indonesia Africa Forum (IAF), Optimizing Global Business Cooperation	Jakarta
189	September 5, 2024	BNI Introduces New Look New Image Concept on National Customer Day	Jakarta
190		BNI Inaugurates Representative Office in Sydney, Becoming the First Indonesian Bank in Australia	Jakarta
191	September 8, 2024	BNI Representative Office in Sydney Ready to be Transformed into a Branch Office Next Year	Jakarta
192		BNI Enters Fortune Indonesia's List of 100 Largest Companies in Indonesia	Jakarta
193	September 9, 2024	Attended by 10,000 Runners, BNI UI Half Marathon 2024 Successfully Held	Jakarta
194	September 11, 2024	Realizing an Inclusive Economy and Digitalizing Access to MSME Financing, BNI Collaborates with Amartha	Jakarta
195	September 12, 2024	This MSME from Bali Successfully Exports Its Products to the US Thanks to BNI's Assistance	Jakarta
196		Getting to Know MSME Kopi Banyuatis, a Typical Balinese Coffee Fostered by BNI	Jakarta
197		BNI and IKA Trisakti Collaboration, Expanding Campus Financial Ecosystem Program	Jakarta
198	September 13, 2024	BNI Venture Bridges Startups and Banking Through the Match Arc Program	Jakarta
199	September 14, 2024	BNI Penetrates the List of 1,000 Best Companies in the World 2024 According to TIMES and Statista	Jakarta
200	September 18, 2024	Strengthening Global Services, BNI Receives Appreciation from the DPR	Jakarta
201	September 19, 2024	DPR Praises the Opening of BNI Representative Office in Sydney	Jakarta
202		Asset Quality Increases, BNI Receives Appreciation from Commission XI of the DPR	Jakarta
203	September 20, 2024	Credit Restructuring Decreases, DPR Gives Appreciation to BNI	Jakarta
204		Record Positive Performance in Semester 1 2024, BNI Praised by DPR	Jakarta
205		Implementing Transparent Sustainability Reports, BNI Wins Republika ESG Award 2024	Jakarta
206	September 21, 2024	BNI, Telkomsel and AOP Collaborate Ready to Make Indonesia the Center for Global Pop Idol in Southeast Asia	Jakarta
207	September 22, 2024	BNI and Bloomberg Collaborate to Facilitate BPD Foreign Exchange Transactions Through the FXGO Platform	Jakarta
208	September 25, 2024	Supporting Green Transition in the Energy Sector, BNI Holds BEST Event	Jakarta
209	September 26, 2024	BNI Records Significant Asset Growth in 5 Years, Supported by Digital Transformation and Strategic Expansion	Jakarta
210	September 28, 2024	BNI Brings Indonesian Badminton Athletes to Make History on the Global Stage	Jakarta
211	September 30, 2024	BNI Investor Daily Summit 2024, Accelerating Economic Growth in the Transition Period	Jakarta
212	October 2, 2024	Collaborating with BPDLH, BNI Distributes Funds for the Small Grant Program	Jakarta
213	October 3, 2024	Supporting Inacraft on October Vol 3, BNI Encourages the Young Generation to Become Entrepreneurs	Jakarta
214		Increasing Accessibility of International Services, BNI Relocates KLN Singapore to Location Strategic at Raffles Place	Jakarta

No.	Date	Title	Venue
215	October 8, 2024	BNI Investor Daily Summit 2024: Optimism Amidst Various Global Challenges	Jakarta
216		BNI Investor Daily Summit 2024: BNI Encourages Business Competitiveness with AI and Cloud-Based Digital Transformation	Jakarta
217	October 9, 2024	Supporting Customer Business Growth, BNIdirect Presents Latest Features	Jakarta
218	October 10, 2024	BNI Investor Daily Summit 2024: BNI and Prabowo's Emotional Memories: A Family Legacy That Continues	Jakarta
219		Investor Daily Summit 2024: Lo Kheng Hong Reveals 6 Ideal Criteria for Stocks Worth Buying, BNI Enters the List	Jakarta
220	October 12, 2024	BNI Investor Daily Summit 2024: BNI Director Shares Tips on Choosing Investments According to Risk Profile	Jakarta
221		Investor Daily Summit 2024: BNI Strengthens Smart City Services to Attract Investment in Regions	Jakarta
222		BNI Supports OJK in Increasing Financial Literacy and Inclusion at FinExpo 2024	Jakarta
223	October 13, 2024	25 Years of GarudaMiles: BNI and Garuda Indonesia Offer Bonuses of Up to 25,000 GarudaMiles for Garuda Credit Cardholders BNI	Jakarta
224		BNI and BNI Partners Win a Series of Awards at the 2024 BUMN Champion Partner Event	Jakarta
225	October 16, 2024	BNI and BPJS Kesehatan Expand Cooperation to Improve National Health Services (16/10)	Jakarta
226	October 17, 2024	Educating Trisakti Students, BNI Reminds of the Importance of Personal Data Protection and Consumer Protection	Jakarta
227	October 23, 2024	Encouraging Innovative Collaboration in the Financial Services Industry, BNi Ventures Brings 10 Axel Arc Start-ups to the Tech In Asia Conference 2024	Jakarta
228		Achieving Ranking 6 for the Largest Tax Paying BUMN in 2023, BNI is Optimistic to Continue Contribution to the Country	Jakarta
229	October 25, 2024	BNI's Q3 Performance Presentation Digitalization Boosts Operational Income, BNI's Profit Reaches IDR 16.3 Trillion in Q3 2024	Jakarta
230	November 1, 2024	Chairman of Commission XI of the DPR Misbakhun Appreciates BNI's Digitalization and Performance	Jakarta
231		UI and BNI Develop a Digital Ecosystem for Innovative and Efficient Education	Jakarta
232	November 4, 2024	Transforming Branch Office Services, BNI Inaugurates the First Super Flagship in Bandung	Jakarta
233	November 7, 2024	Present at Indonesia Week Hong Kong 2024, wondr by BNI Closer to Indonesian Diaspora in Hong Kong	Jakarta
234	November 8, 2024	Increasing Digital Literacy, BNI Invites UKSW Salatiga Students to Become a Financially Smart Generation	Jakarta
235	November 9, 2024	BNI Digital Banking Cafe Present in Bali, Enjoy the Beauty of Mount Batur While Making Transactions	Jakarta
236	November 10, 2024	Reformasi Run on Heroes' Day, wondr by BNI Present in Senayan	Jakarta
237	November 11, 2024	Indonesian Consulate General Names BNI as the Best Bank Serving Diaspora in Hong Kong	Jakarta
238		BNI Obtains USD 600 Million Loan Facility from 6 Foreign Banks	Jakarta
239	November 13, 2024	Becoming a Debtor's Strategic Partner, BNI Affirms Commitment to Encourage Green Transition at COP29 Azerbaijan	Jakarta
240		Supporting Indonesia Fintech Summit 2024, BNI Educates the Public about Financial Services Integration	Jakarta
241	November 16, 2024	BNI Culture Fest 2024, Transformation in Building Work Culture and Performance	Jakarta
242	November 18, 2024	BNI's Digitalization and Expansion Abroad Receive Praise from DPR Members	Jakarta
243	November 20, 2024	BNI Optimizes Digital Services to Make it Easier for Manulife Customers to Pay Premiums	Jakarta
244	November 21, 2024	Win Best Employer Brand on Linkedin Talent Award Indonesia 2024, BNI Leads the Future of the World of Work	Jakarta
245		BNI Expands Services for the Indonesian Diaspora in the Netherlands through the Implementation of KMILN	Jakarta
246	November 22, 2024	Strengthening Commitment as an Agent of Development, BNI Partners with Batumbu to Expand Access to Financing for MSMEs	Jakarta
247		Pocketing the ASRAT Gold Rank for 4 Consecutive Years, Proof of BNI's Commitment to Implementing Sustainable Finance	Jakarta
248	November 23, 2024	Indonesian Ambassador to the Netherlands: BNI's Support for KMILN Affirms Its Position as a Parent Bank	Jakarta

No.	Date	Title	Venue
249	November 28, 2024	BNI Wins the Title of "The Most Trusted Companies" at the 2024 Corporate Governance Perception Index Award	Jakarta
250		Consistently Improving the Quality of GCG Implementation, BNI Again Wins the Title of The Best Overall in Corporate Governance	Jakarta
251		Presenting a New Concept, BNI Emerald Center Pamper Premium Customers	Jakarta
252	November 29, 2024	BNI Mastercard World Comes with New Design and Features, Living Healthier, Traveling More Exciting	Jakarta
253		BNI Gets Closer to Loyal Merchants Through "BNI Wonderful Movie Day 2024"	Jakarta
254	November 30, 2024	Royke Tumilaar CEO of The Year 2024, Becomes an Influential Figure in the Indonesian Banking Industry	Jakarta
255		The Excitement of Shopping Race in 17 Cities, The More You Shop with BNI, the More Profitable	Jakarta
256	December 1, 2024	DPR Praises BNI's Presence in the Netherlands, Providing the Best Service to the Diaspora	Jakarta
257	December 2, 2024	Caring for the Future, Young Generation, BNI's Real Action to Tackle Stunting and Undernourished Pregnant Women in Tasikmalaya	Jakarta
258	December 3, 2024	Deputy Chairman of Commission XI of the Indonesian House of Representatives Appreciates BNI's Role as an Agent of Development	Jakarta
259	December 4, 2024	BNI Ventures Collaborates with IPB to Develop a Startup Ecosystem	Jakarta
260	December 6, 2024	Supporting East Java's Economic Growth, BNI is Closer to Business Actors in Surabaya	Jakarta
261		BNI's Positive Performance Record Praised by the DPR	Jakarta
262	December 7, 2024	Supporting Financial Inclusion, BNI Participates in Celebrating International Disability Day 2024	Jakarta
263	December 11, 2024	Becoming the Best Bank in the Rupiah Money Market to Inclusive Financing, BNI Wins 5 Awards from Bank Indonesia	Jakarta
264	December 12, 2024	BNI's Efforts to Support the Government in Achieving Net Zero Emissions 2060	Jakarta
265	December 15, 2024	Innovative in Campus Services, BNI Wins the Diktisaintek Award	Jakarta
266	December 17, 2024	BNI Moves Quickly to Distribute Aid to Sukabumi Disaster Victims	Jakarta
267	December 19, 2024	Consistently Implementing Information Transparency, BNI Wins Informative BUMN from the Central Information Commission	Jakarta
268	December 19, 2024	BNI Prepares IDR19.74 Trillions in Cash, Ensure Safe and Secure Transactions During Christmas and New Year	Jakarta
269	December 19, 2024	Increase Coffee Farmer Productivity, BNI Equatorial Coffee Exploration Present in Temanggung	Jakarta
270	December 20, 2024	Supporting the Work of the Disabled, BNI Head Office Displays Paintings by 7 Young Visual Artists	Jakarta
271	December 21, 2024	Hibank and Strategic Partners Sign MOU to Build a Digital Ecosystem for MSMEs in Indonesia	Jakarta
272	December 21, 2024	BNI Provides Explanation Regarding Sritex's Bankruptcy Status	Jakarta
273	December 22, 2024	Supporting MSMEs to Go Global, BNI Collaborates with PT Pos to Strengthen Logistics and Financing Ecosystems	Jakarta
274	December 22, 2024	New BNI Credit Card Product - My Pertamina, Buy Fuel and Get Cashback	Jakarta
275	December 24, 2024	Digital Transformation, BNI DPLK Present with New Website	Jakarta
276	December 31, 2024	BNI Xpora Helps Indonesian Coffee MSMEs Penetrate South Korean and Taiwanese Export Markets	Jakarta
277	December 31, 2024	Closing 2024, wondr by BNI Users Get Ready to Receive Financial Transaction Reports from wondr insight	Jakarta

SOCIAL MEDIA

BNI utilises social media as one of the main communication tools to interact with external corporate parties, including customers, business partners and the wider community. Through platforms such as Instagram (Quickpose), BNI actively conveys information on Company Activities, company policies, and educational campaigns related to finance and banking. The use of social media allows BNI to respond to the needs and questions of the public quickly and effectively, while building closer and more transparent relationships with stakeholders. With a well-directed communication strategy, social media is also an important tool in strengthening BNI's positive image in the eyes of the public.

No	Date	Title
1	January 1, 2024	Happy New Year 2024
2	January 3, 2024	Beware! Scam Prize Draw Programs Are Rampant in the Name of BNI
3	January 8, 2024	Welcoming 2024, Listen to the Message from the President Director of BNI
4	9 Januari 2024	BNI held an event at the beginning of the year, namely the 2024 New Year's Friendly Gathering in order to establish friendship with the entire BNI Hi-Movers family
5	January 11, 2024	As a form of support from the Ministry of SOEs and BNI for women.
6	January 12, 2024	Due to Negligence, the Balance in the Account Can End in Goodbye
7		Fake Job Applications End in Sorrow
8		In the midst of the development of digitalization, BNI continues to organize its office network. In addition to reducing the number of branch offices, BNI also continues to transform existing branch offices.
9	January 21, 2024	BNI also participated in Christmas activities with the Ministry of SOEs with the theme 'Glory to God and Peace on Earth'
10	January 24, 2024	First Day of Indonesia Masters 2024, Indonesia Reaps Many Achievements
11	January 27, 2024	Enthusiasm to Win for Indonesia
12	January 28, 2024	Indonesian Men's Doubles Maintain Tradition of Winning Indonesia Masters 2024
13	January 30, 2024	Three Years of Transformation, BNI Produces Solid and Quality ROE
14	February 1, 2024	Indonesia Incorporated Day: BNI is Committed to Continuing to Encourage Diaspora Potential
15	February 3, 2024	Implementing CSR Programs, BNI and the DKI Jakarta Provincial Government Inaugurate Swadharma Shop for Street Vendor Management
16		Football For Fun, Grassroot Football Day Bhayangkara Presisi with BNI
17	February 7, 2024	BNI Wins Alpha Southeast Asia Best Awards 2023
18	February 8, 2024	Happy Commemorating Isra Miraj 1445 H/2024 M
19		The Meaning of the Isra Mikraj Event in the Lives of Muslims
20	February 9, 2024	Happy National Press Day
21		Improving Teacher Competence, BNI Shares Teacher Certification
22		Monthly Meeting, Agenda Setting of the Ministry of SOEs
23	February 10, 2024	Congratulations Chinese New Year 2575
24		According to Feng Shui, These Are the Lucky Charms in the Year of the Dragon 2024
25	February 12, 2024	3 Years of BNI Transformation Produce Solid & Quality ROE
26	February 18, 2024	Rise of The Dragon, Chinese New Year 2024
27	February 20, 2024	Welcoming the 25th Anniversary of the BNI Workers Union, Holds Fun Football – Friendly Match with HIMBARA
28	February 21, 2024	National Waste Care Day
29		BNI Hi-Movers, Are You Sure You Care About the Environment? Try to Guess What 3R Stands For!
30	February 22, 2024	BNI Groundbreaking The Icon of Emerald
31		ITB Studium Generale, BNI President Director Encourages the Young Generation to Become Entrepreneurs
32	February 25, 2024	BNI and Posind Establish Cooperation
33	February 26, 2024	Beware of Investment Fraud Cases and Illegal Loans, BNI Holds Financial Planning Education
34	February 27, 2024	Get Ready to Attack the Best Local Products with Special Offers at Inacraft
35	February 28, 2024	Happy Galungan Day
36	March 1, 2024	BNI is Committed to Continue Supporting the Development of the Indonesian Capital City (IKN)
37		Exactly twenty years of BNI supporting MSMEs to develop through Jakarta International Inacraft
38	March 2, 2024	BNI Wins 3 ESG Awards

No	Date	Title
39	March 5, 2024	Distributing 50% Dividends, BNI is Optimistic that Performance Will Be More Positive in 2024
40		Congratulations and Success to the Board of Commissioners of PT Bank Negara Indonesia
41		Congratulations and Success to the Board of Directors of PT Bank Negara Indonesia
42	March 7, 2024	BNI Exporters Forum Supports MSMEs to Penetrate the Global Market
43	March 8, 2024	BNI Strengthens Commitment, Increases Financial Literacy and Inclusion through Various Programs
44		e-Imsakiyah Ramadan 1445 Hijriah Can be accessed at any time
45	March 9, 2024	Happy Kuningan Day
46	March 10, 2024	BNI Wins Two Corporate Communication Awards at BCOMSS 2024
47	March 11, 2024	Happy Nyepi Day, Saka New Year 1946
48		Marhaban Ya Ramadan
49	March 14, 2024	BNI Win OMNI Brand of The Year 2024 Award
50	March 17, 2024	Congratulations to Indonesian Athletes for Their Great Achievement in Advancing to the All England 2024 Final
51		Support the Struggle of Indonesian Athletes in the All England 2024 Final
52	March 18, 2024	Indonesia is increasingly shining in the All England 2024 final
53	March 20, 2024	Hidden Treasure Worth Millions of Rupiah Awaits You
54	March 21, 2024	Find The Treasure
55		Anti-Dizziness Trick to Find the Find The Treasure QR Code
56	March 22, 2024	1 Meaningful Hour for Earth Sustainability
57	March 23, 2024	BNI and ITS Surabaya Collaborate on Banking Services
58		Ramadan Excitement, BNI and UNAIR Collaborate to Distribute Food Packages
59	March 24, 2024	Extraordinary Achievements of Indonesian Athletes Advancing to the Swiss Open Final
60		BNI Supports the Global Earth Hour Initiative
61	March 25, 2024	Indonesia is the Champion! Wins 3 Swiss Open Titles
62		Realizing Collaboration, SP BNI Celebrates 25th Anniversary and Inaugurates Roemah Aspirasi
63		Encouraging Startup and Digital Ecosystem Development, BNI Ventures Injects Funds into Rukita
64	March 26, 2024	2024 BUMN Ramadan Safari Held
65	March 29, 2024	Happy Good Friday
66		Creating Digital Innovation, BNI Wins Awards
67	March 31, 2024	Happy Easter
68		Wonderful Ramadan, BNI Shares Celebrating Nuzulul Quran Night
69	April 1, 2024	Congratulations to Indonesian Athletes
70		Indonesia is the Champion in Europe
71	April 3, 2024	BNI Wins 18 Awards
72	April 5, 2024	Fun Homecoming with BUMN
73		Commitment to Implementing Good Corporate Governance
74		BNI Xpora Brings Indonesian Coffee MSMEs to the Amsterdam Coffee Festival
75	April 6, 2024	Want a More Comfortable Homecoming? Tapcash You Must Bring
76		BNI Ensures Services Are Ready to Welcome Eid 2024
77	April 7, 2024	Welcome Wonderful Lebaran, This is BNI's Promo
78		BNI Shares Happiness in the Month of Ramadan
79	April 8, 2024	Anxiety-Free Homecoming with the Ease of BNI Cash Withdrawals
80		BNI Holds Employee Volunteering to Clean and Help Mosque Infrastructure
81		Support Indonesia to be the Champion in Asia
82	April 9, 2024	Homecoming Without Queuing, Order and Buy Whoosh Tickets on BNI Mobile Banking
83		Happy Eid Al-Fitr
84		Proud to be BNI HI-Movers
85	April 10, 2024	It doesn't feel like 30 days have passed since we maximized the wonderful Ramadan filled with togetherness
86	April 13, 2024	Joatan Christie's Spirit to Win
87	April 14, 2024	Congratulations Jonatan Christie
88	April 16, 2024	Xpora's Fostered MSME Products Penetrate the American Market
89	April 18, 2024	BNI Supports MSMEs to Penetrate the Singapore Market
90	April 20, 2024	Indonesia Wins at All England and BAC

No	Date	Title
91	April 21, 2024	Happy Kartini Day
92		Happy Kartini Day
93		Happy Kartini Day
94	April 22, 2024	Happy Earth Day
95		BNI Holds an Awards Night to Give the Highest Appreciation for the Achievements of athletes
96	April 24, 2024	BNI and UNDIP Synergize
97	April 25, 2024	Road to Thomas and Uber Cup 2024
98	April 26, 2024	BNI and Telkomsel Establish Reciprocal Cooperation for Employees
99	April 27, 2024	Good Luck in the Thomas and Uber Cup 2024
100	April 30, 2024	Print Credit Growth Amidst Global Dynamics
101	May 1, 2024	Happy Labor Day
102		BNI and UNUD Synergy
103	May 2, 2024	Happy National Education Day
104		Quick Question with Jonathan Christie
105		BNI Provides Financing Solutions for Business Actors through Supply Chain Financing
106		Support Green Financing
107	May 3, 2024	Quick Question with Anthony Ginting
108	May 4, 2024	Posting Credit Growth Amidst Global Dynamics, MSME and Consumer Segments Become BNI's New Growth Engines
109		Congratulations Indonesia, Thomas & Uber Goes to Final
110	May 5, 2024	Thank You Uber Team for Their Struggle to Achieve Runner Up
111		BNI Java Jazz On The Move Special Edition Returns
112		Thank You for the Struggle of the Thomas Indonesia Team
113	May 7, 2024	BNI Welcomes the Return of the Thomas and Uber Indonesia Teams to Indonesia
114	May 8, 2024	BNI Fully Supports Aldila in Achieving Her Dream of Becoming a Grand Slam Champion
115	May 9, 2024	Happy Commemorating the Ascension Day of Jesus Christ
116	May 14, 2024	BNI Collaborates with 25 PTN
117	May 15, 2024	BNI Strengthens Synergy with the Indonesian Army
118	May 18, 2024	Aldila Sutijadi and Asia Muhammad – FINAL
119		BNI Amsterdam Further Optimizes BNI's Business in Europe
120		The 2024 Thropee Clarins Champion
121	May 19, 2024	BNI Wins the Marketeers Youth Choice Award
122	May 20, 2024	Happy National Awakening Day
123	May 22, 2024	BNI Delivers Batch V BUMN Bakti Volunteers to Samboja and IKN
124		BNI Ventures Injects Funds into Fishlog
125		World Water Forum 2024 Held in Bali, BNI becomes the only banking partner
126	May 23, 2024	Happy Vesak Day
127		BNI Strengthens Synergy with IKN Authority
128		BNI Java Jazz Festival 2024 Held for 3 Days in Kemayoran
129	May 24, 2024	How to Get to the BNI Java Jazz Festival 2024 Venue
130		Swing Into Wondrful Music Experience
131		Here's the Line Up for BNI Java Jazz Festival 2024
132		Can Plastic Waste Be a Gift? Let's Exchange It at the BNI Java Jazz Festival Recycle Vending Machine
133	May 25, 2024	BNI Java Jazz Festival 2024! More Than Just Music, Experience the Wondrful Experience
134		Erwin Gutawa, Ruth Sahanaya, and Incognito Captivate Audience on the First Day of the BNI Java Jazz Festival 2024
135		Welcome to BNI Java Jazz Festival 2024
136	May 26, 2024	Wondrous Day Two of the BNI Java Jazz Festival
137		BNI Agen 46 Present at the Wondrous Booth of the BNI Java Jazz Festival 2024
138	May 27, 2024	The Most Stunning Jazz Music Performance in Indonesia
139	May 28, 2024	BNI and UNY Establish Synergy
140	May 29, 2024	BNI Finance Records Positive Performance in Q1 2024

No	Date	Title
141	May 30, 2024	Happy Birthday Mr. Erick Thohir
142		BNI Java Jazz Festival 2024 Successfully Drives BNI Digital Transactions
143	June 1, 2024	HARLAH PANCASILA 2024
144	June 2, 2024	BNI Holds BNI Exporters Forum 2024 in Bandung
145		BNI Invites Emerald Customers
146	June 3, 2024	Ready to Ignite Enthusiasm for Indonesia Open 2024
147		Happy World Environment Day
148	June 5, 2024	BNI Finance Director Wins The Most Inspiring Women Leader Award
149		For enlivening its 78th anniversary, BNI launches a special anniversary logo with deep meaning
150	June 6, 2024	3 Trivial Habits that make you Incredible
151	June 7, 2024	BNI Becomes a Catalyst for MSMEs Through Collaboration with Pupuk Indonesia Holding Company
152		BNI Hi-Movers, BNI is participating in the success of the BUMN Volunteer Bakti Batch V program initiated by BUMN for the rehabilitation of orangutans and mangroves in Samboja and the Indonesian Capital City (IKN) in East Kalimantan.
153		The Excitement of BNI Hi Movers as Participants in the BUMN Volunteer Bakti
154		3 Innovations That Make It Easier for You to Manage Your Time
155	June 8, 2024	BNI is Ready to Spread Interesting Promos at the 2024 Jakarta Great Sale Festival
156		Have Lots of Ideas but Not Confident in Delivering Them?
157	June 9, 2024	BNI and Emirates Hold the Third Travel Fair
158		Want to know what can help your career skyrocket?
159	June 12, 2024	One of BNI's efforts is the implementation of the 2024 BNI Performance Excellence Award (PEXA).
160		Tell Us Your Hopes for BNI
161	June 13, 2024	BNI now presents a place for all BNI Hi-Movers to innovate and provide creative ideas through the website bni.ideaboxapp.com.
171		Do You Have an Innovation for BNI?
172	June 14, 2024	BNI Xpora Sends 12 Food and Beverage MSMEs to Indonesia in Korea – SFH 2024
173	June 15, 2024	BNI Opens Limited Services on Eid al-Adha 1445 H
174		Life is Wonderful, Experience it! With BNI Titanium Card
175		BNI Educates the Community on Waste Management
176	June 16, 2024	BNI and Oppo Collaborate to surprise their loyal customers by providing free tickets to watch the UEFA Champions League Final Match in England
177	June 17, 2024	Happy Eid al-Adha 1445 H
178	June 18, 2024	#BNIBoxOfTheFuture Did You Know?
179	June 21, 2024	Happy Birthday Mr. Ir.H. Joko Widodo
180	June 23, 2024	78th Anniversary, BNI Plants 78,000 Mangrove Seedlings in Teluk Pangpang
181	June 25, 2024	BNI Innovation Award (Binnova) is Back
182	June 27, 2024	Donate Clothes to BNI Emphaty Drop Box
183	June 28, 2024	What's New on BNI's 78th Anniversary?
184	June 30, 2024	BNI Launches Special Black Pink the Game Tap Cash Card
185		Holding Financial Education and Information Disclosure, BNI Introduces Digiremit Application in Japan
186	July 1, 2024	BNI Accelerates Diaspora-Owned Businesses in Japan
187		To commemorate BNI's 78th anniversary, BNI wants to share various exclusive promos for loyal BNI customers
188	July 2, 2024	Let's donate your unused clothes at the BNI Emphaty Drop Box
189	July 3, 2024	Let's celebrate BNI's 78th anniversary together by enjoying various exclusive promos for all BNI Group products and services
190	July 4, 2024	Providing the best service, BNI wins 13 Infobank Banking Service Excellence Awards 2024
191		BNI Loudfest Starter Pack
192		To Get Closer, Just Stream

No	Date	Title
193	July 5, 2024	Calling out Discount Hunter
194		Make your vacation plan from taking selfies in front of the Eiffel Tower to surfing in Hawaii, with wondr by BNI.
195		Finally, the friend who understands you the most and knows your needs is here!
196		Make your culinary mission from Italian menus to having coffee at trendy cafes come true!
197		Make your daily needs to your future desires easier with wondr by BNI
198		Make shopping for all your daily needs, filling your home, to buying your dream items easier with wondr by BNI
199		Start planning your life with the new banking app, wondr by BNI.
200		wondr wondr do your wondr jadiin maumu, wondr is yours
201	July 6, 2024	BNI Launches wondr by BNI Application
202	July 7, 2024	Happy Islamic New Year 1 Muharram 1446 H
203		BNI held a spectacular music event titled BNI LoudFest Vol 3 2024 in order to celebrate its 78th birthday.
204		BNI held the wondrPARADE activity at Car Free Day (CFD) in Jakarta
205	July 10, 2024	BNI Inaugurates Integrated Service Unit at ITB
206	July 19, 2024	BNI Celebrates 78th Anniversary by Launching wondr by BNI and Holding BNI Expo 2024
207	July 21, 2024	Series of 78th Anniversary, BNI Holds Retirement Gala Dinner, Calling for The wondrful Journey of BNI
208		BNI Appointed as RDN Administrator and Payment Bank
209		Enlivening BNI Anniversary, Wondrful soccer Presents Exciting Football Matches
210	July 22,2024	BNI Holds Emerald Private Golf Clinic Gen 2.0
211		BNI and DJP Hold Tax Campaign "Spextacular 2024" Calling for Strong Taxes, Healthy APBN
212	July 23, 2024	Happy National Children's Day
213		BNI Expo 2024, wondrful journey
214	July 24, 2024	Kapolri Cup 2024 by BNI, Enlivening Bhayangkara Anniversary
215		78th Bhayangkara Anniversary, BNI Supports Kapolri Cup Badminton Championship 2024
216	July 25, 2024	BNI Encourages Financial Institutions to Adopt Digitalization of Trade Transactions
217	July 27, 2024	Good Luck to the Indonesian Team at the Paris Olympics 2024
218	July 29, 2024	BNI and Indosat Collaborate, Provide Financial Services and Information Technology
219		BNI Hopes the 2024 Kapolri Cup Badminton Championship Will Be an Event to Find Out Athletes with Achievements
220	July 31, 2024	BNI Ciputra Golfpreneur Tournament 2024 Held
221		Visit BNI Expo 2024, Find Out How to Own a House, Vehicle, and Picnic of Your Dreams Easily and Attractively
222		The Festive Kapolri Cup 2024 by BNI Officially Ends
223	August 2, 2024	Opening Today in BSD, BNI Expo 2024
224	August 3, 2024	BNI Expo 2024 officially opened on Friday, August 2, 2024 at Hall 1-3A ICE BSD, Tangerang. BNI Securities Ready to Pamper Customers with Promotions at BNI Expo 2024
225		Innovative and Dedicated, BNI and BNI Securities Win Awards at the 2024 Asian Banking & Finance Awards
226		BNI Launches Co-branding Credit Card with MAPCLUB
227	August 4, 2024	BAZAR Merdeka DWP Ministry of SOEs
228		BNI Expo 2024 Becomes an Event for Business Matching between MSMEs and International Buyers
229		Supporting Gregoria Mariska Tunjung, in the Semifinals of the 2024 Paris Olympics
230		Enlivening BNI Expo 2024, BNI Asset Management Invites the Public to Learn to Manage Finances
231		Congratulations Gregoria Mariska Tunjung, Bronze Medalist for the 2024 Paris Olympics
232		Celebrating BNI's 78th Anniversary, Thousands of Runners Join the BNI Milestune 5K
233		BNI Expo 2024 Successfully Held, Tens of Thousands of Visitors Enjoy a Wonderful Journey

No	Date	Title
234	August 7, 2024	BNI Xpora Brings Fostered MSMEs to the Shoppe Object NYC 2024 Journey Exhibition
235	August 8, 2024	Congratulations on the Achievement of the 2024 Paris Olympics
236	August 9, 2024	wondr by BNI Enlivens the 2024 Tomohon International Flower Festival
237	August 10, 2024	President Jokowi Inaugurates Banking Café at IKN
238	August 13, 2024	Don't Be Fooled by Fake Call Centers in the Name of BNI on Google Maps
239		Happy Scout Day
240	August 14, 2024	Opening Today in BSD, BNI Expo 2024
241		BNI Presents Banking Ecosystem for Mercubuana University
242		Refreshment New Sales Model Revolution Strategy Performance Excellence (RETRACE)
243	August 15, 2024	Congratulations on the Award from the President of the Republic of Indonesia
244		UI Half Marathon Held Again
245	August 16, 2024	BNI Synergizes with UNTAD, Strengthens Campus Financial Ecosystem Program
246	August 17, 2024	Happy Birthday to the Republic of Indonesia
247		New Archipelago, Advanced Indonesia
248		BNI Enters the Ranks of the Largest Companies in Indonesia
249	August 18, 2024	BNI Xpora Successfully Holds BNI Exporters Forum in Makassar
250		BNI and OJK Educate IKN Construction Workers about the Dangers of Online Gambling
251	August 19, 2024	wondr by BNI financial friend for all Indonesian Diaspora
252		National Housing Day 2024, BNI Supports Greening in IKN
253	August 20, 2024	Support the struggle of Indonesian badminton athletes in the 2024 Japan Open which will take place on August 20-25, 2024 at the Yokohama Arena, Japan. BNI Ciputra Golfpreneur Tournament 2024 Returns
254	August 21, 2024	BNI Supports Diaspora Through Excellent Programs Through Overseas Office Networks
255	August 23, 2024	Business Growth Acceleration Drives BNI's Performance in Semester 1 2024
256	August 24, 2024	BNI Wins Prestigious Award from OJK
257	August 25, 2024	BNI and Ciputra Collaborate in Tournament 2024, Encouraging Indonesian Golfers to the World Stage
258		TULOLA Together with BNI Presents Kawan Nusantara "The Dancer"
259	August 28, 2024	Making it Easier for Diaspora, BNI and the Ministry of Foreign Affairs Collaborate on Indonesian Community Cards Abroad
260		BNI Bazaar Fest Vol.3 Held for 3 Days, Presents Retail and Fashion to Culinary MSMEs
261	August 29, 2024	Public Espose Live 2024 BNI
262		Establish Cooperation, BNI Provides Banking Products and Services for Bappenas
263	September 2, 2024	Congratulations on the Men's Doubles Champion at the 2024 Kore Open
264		wondr by BNI Makes it Easier for Visitors to Transact
265		There is BNI's Support Behind the Indonesia Africa Forum (IAF), Optimizing Global Business Cooperation
266	September 4, 2024	Happy National Customer Day. Thank you for being part of BNI's journey in providing quality products and services
267		BNI Introduces New Look New Image Concept on National Customer Day 2024
268	September 5, 2024	BNI Inaugurates Representative Office in Sydney
269	September 9, 2024	Attended by 10,000 Runners, BNI UI Half Marathon 2024 Successfully Held
270	September 12, 2024	Realizing Inclusive Economy and Digitalization of MSME Financing Access, BNI Collaborates with Amartha
271		BNI Synergizes with IKA Trisakti, Strengthens Campus Financial Ecosystem Program
272	September 15, 2024	BNI Reaches 1,000 Best Companies in the World 2024
273	September 16, 2024	Happy Commemorating the Prophet Muhammad's Birthday
274		BNI is Proud of the Achievements of Indonesian Badminton Athletes
275	September 18, 2024	BNI Indonesian Masters 2024 Ready to be Held, Presenting Global Spirit
276	September 20, 2024	BNI Wins Republika ESG Award 2024

No	Date	Title
277	September 22, 2024	Indonesia Will Become the First Global Pop Idol Center in Southeast Asia
278		BNI and Bloomberg Collaborate
279	September 23, 2024	BNI Named as the World's Most Trustworthy Companies 2024
280	September 25, 2024	Happy Galungan 2024
281		Supporting the Green Transition in the Energy Sector, BNI Holds BEST Event
282	September 27, 2024	BNI Records Significant Asset Growth for 5 Years
283	September 28, 2024	A Proud Track of Achievements for Badminton Athletes with BNI
284	September 30, 2024	BNI Invertor Daily Summit 2024
285	October 1, 2024	Happy Pancasila Sanctity Day
286	October 2, 2024	Happy National Batik Day
287		Digitization is Getting Faster, BNI is Optimistic that Business Will Continue to Grow Positively
288		Collaborating with BPDLH, BNI Distributes Assistance Funds for the Small Grant Program
289	October 3, 2024	Supporting Inacraft on October Vol.3, BNI Encourages the Young Generation to Become Entrepreneurs
290		Increasing Accessibility of International Services, BNI Relocates KLN Singapore to a Strategic Location at Raffles Palace
291	October 4, 2024	BNI Spreads Attractive Promos at #DiIndonesiaAja LPS Travel Fair 2024
292	October 5, 2024	Happy Kuningan Day
293		BNI Singapore Milestone: Inspiring Track of Achievement and Growth
294		BNI Investor Daily Summit 3 Days To Go
295	October 6, 2024	BNI Investor Daily Summit 2 days To Go
296		BNI Hi-Movers, BNI Investor Daily Summit 2024 which will be held on October 8-9, 2024 at Assembly JCC is a collaboration event between sectors and for various stakeholders ranging from the Government, business actors, to investors to jointly formulate strategies to face global and national economic challenges.
297	October 7, 2024	BNI Investor Daily Summit 1 Day To Go
298		BNI Hi-Movers, don't miss the interesting session with Ms. Corina Leyla Karnalies, Director of Retail Banking BNI at the BNI Investor Daily Summit 2024. In the session themed "Financial Independence: Ensuring Financial Literacy across Indonesia", Ms. Corina will discuss the importance of financial literacy as a foundation for achieving financial independence throughout Indonesia.
299		BNI Hi-Movers, Mr. I Made Sukajaya, Director of Enterprise and Commercial Banking BNI, will discuss the regional government's strategy to attract foreign investment for a brighter future in a session titled "Investing in the Future: How Regional Governments Can Attract Foreign Direct Investment" at the BNI Investor Daily Summit 2024.
300		
301		Director of Technology & Operations BNI, Mr. Toto Prasetio, will discuss how digitalization and technology adoption can drive maximum business growth in a session titled "Business Transformation: How Digitalization & Technology Adoption Will Maximize Business Growth at the BNI Investor Daily Summit 2024.
302		
303		Director of Wholesale and International Banking BNI, Mr. Agung Prabowo, will have an in-depth discussion at the BNI Investor Daily Summit 2024 with the topic Indonesian Capital Market Outlook: Identifying New Investment Opportunities & Strategies. This session will discuss new investment opportunities and strategies in the Indonesian capital market.
304	October 8, 2024	BNI Investor Daily Summit 2024, Optimism Amidst Various Global Challenges
305	October 9, 2024	BNI Investor Daily Summit 2024, BNI Encourages Business Competitiveness with AI and Cloud-Based Digital Transformation
306		BNI Investor Daily Summit 2024, BNI Expands Business in Tourism and Health Sectors, Encourages Economic Growth
307	October 10, 2024	BNI Investor Daily Summit 2024, Lo Kheng Hong Reveals 6 Ideal Criteria for Stocks Worth Buying, BNI Enters the List
308		BNI Investor Daily Summit 2024, BNI Shares Tips for Choosing Investments According to Risk Profile
309		BNI Investor Daily Summit 2024, BNI Strengthens Smart City Services to Attract Investment in the Regions
310		BNI Investor Daily Summit 2024, Historic Moment Investment Forum Opened by the President and Closed by the President-Elect

No	Date	Title
311		BNI greatly appreciates the willingness of the Minister of Defense of the Republic of Indonesia and the President-Elect 2024-2029, Mr. Prabowo Subianto, to deliver a vision statement and close the BNI Investor Daily Summit 2024 event on October 9 2024. Mr. Prabowo recalls his family's legacy in the history of BNI, which strengthens his emotional bond with the state-owned bank.
312	October 12, 2024	25 Years of GarudaMiles BNI and Garuda Indonesia Offer Bonuses of up to 25,000 Garuda Miles for BNI Garuda Credit Cardholders
313		FinExpo 2024: BNI Supports OJK in Increasing Literacy and Inclusion
314	October 13, 2024	Good Luck! Jonathan Christie
315	October 14, 2024	Congratulations! Jonatan Christie
316		BNI and Partners Win a Series of Awards at the 2024 Mitra BUMN Champion Event
317		BNI and Bluebird Strengthen Payment Digitalization with QRIS across Bluebird's Entire Fleet
318	October 16, 2024	BNI is the Most Transparent Company According to the 2024 GCG Award CNBC with the Attorney General's Office
319	October 17, 2024	Educating Trisakti Students, BNI Reminds of the Importance of Personal Data Protection
320		Happy Birthday to the Elected President of the Republic of Indonesia 2024 – 2029
321	October 18, 2024	wondr by BNI Wins Award in the Innovation and People's Economy Category
322	October 20, 2024	Thank You and Good Luck
323	October 24, 2024	BNI Opens DayCare for Employees' Children, Collaborating with KinderCastle
324		BNI Hi-Movers, BNI President Director Mr. Royke Tumilaar invites all BNI HI-Movers, customers, debtors, business partners and other stakeholders to report alleged violations committed by BNI Hi-Movers personnel through the Whistleblowing System or WBS channel. BNI Profit Reaches IDR 16.3T in Q3-2024
325	October 25, 2024	Inspired by the Youth Pledge, on October 28, 2024 we are ready to take action
326	October 26, 2024	Inspired by the Spirit of the Youth Pledge, We Vow to Make It Easier to Make Your Wishes Happen with wondr by BNI
327	October 27, 2024	Happy Youth Pledge Day
328	October 28, 2024	Compete for a Total Prize of US$2 Million, World Elite Golfers Enliven the BNI Indonesian Masters 2024
329	October 30, 2024	BNI Hi-Movers Innovation at BINNOVA BNI 2024
330	October 31, 2024	BNI Distributes Supply Chain Financing for Bumi Serpong Damai Partners
331	November 3, 2024	Richard T Lee Wins BNI Indonesian Masters 2024
332	November 6, 2024	Through the Digital Finance Ecosystem, BNI Supports the National Nutrition Agency to Distribute Free Food
333		Present at Indonesia Week Hong Kong 2024, wondr by BNI Gets Closer to the Hong Kong Diaspora
334		BNI Hi-Movers, at this 11.11 moment, it's time for us heroes of life self-appreciation.
335	November 8, 2024	Supporting Unlimited Creativity, wondr by BNI Presents Pop Culture Performance at wondrful Indonesia Comic Con 2024
336		Happy Birthday to the Elected President of the Republic of Indonesia 2024 – 2029
337		7 Directions from the Minister of SOEs to Make President Prabowo's Free Nutritious Meal Program a Success
338	November 9, 2024	On This 11.11 Moment, It's Time to Appreciate Yourself as a Hero of Life
339		Increase Financial Literacy, BNI Invites UKSW Salatiga Students to Become a Smart Millennial Generation
340	November 10, 2024	Happy Heroes' Day!
341		wondrful Indonesia Comic Con 2024 Officially Presents Local and International Pop Culture Icons
342		BNI Digital Banking Café Present in Bali, Enjoy the Beauty of Mount Batur while Making Transactions
343	November 11, 2024	Reformasi Run on Heroes' Day, wondr by BNI Present in Senayan
344		Ever panicked at the cashier because your balance was insufficient and you had to queue?
345	November 13, 2024	Through the Version 2 Auction Portal, BNI and DJKN Increase the Ease of State Auctions
346	November 14, 2024	BNI Culture Fest 2024
347	November 15, 2024	Supporting the Indonesia Fintech Summit, BNI Educates the Public About Financial Services Integration
348	November 16, 2024	BNI Culture Fest 2024, Transformation in Building Work Culture and Performance

No	Date	Title
349	November 17, 2024	Congratulations to Indonesian Athletes for Their Achievements at the Kumamoto Masters Japan 2024
350	November 18, 2024	Supporting the World of Education, BNI Presents Teacher Training and Financial Literacy Certificates for Students
351	November 21, 2024	Completing the Dukuh Atas Sudirman TOD Ecosystem, BNI Inaugurates Naming Rights for the Jabodebek LRT "Dukuh Atas BNI Station"
352		wondr by BNI Bright Up Cup Jakarta 2024
353		Making it Easier for Manulife Customers to Pay Premiums, BNI Optimizes Digital Services
354	November 22, 2024	Winning Best Employer Brand on LinkedIn Talent Awards, BNI Leads the Future of the World of Work
355	November 23, 2024	Get Gold rank ASRRAT 4 Years, Proof of BNI's Commitment to Implement Sustainable Finance
356		wondr by BNI Bright Up Cup 2024
357	November 24, 2024	Strengthening Commitment as Agent of Development, BNI Collaborates with Batumbu to Expand Financing Access for MSMEs
358		Indonesian Ambassador to the Netherlands: BNI's Support for KMILN Affirms Its Position as a Global Bank
359	November 25, 2024	Happy National Teachers' Day
360	November 27, 2024	Consistently Improving the Quality of GCG Implementation, BNI Again Wins the Title of 'The Best Overall in Corporate Governance'
361		Consistently Implementing GCG, BNI Wins the Title of "The Most Trusted Companies" at the 2024 Corporate Governance Perception Index Award
362	November 28, 2024	Winning 4 Awards from Visa, BNI Strengthens Its Position as a Transactional Bank
363	November 29, 2024	BNI Gets Closer to Loyal Merchants
364		Presenting a New Concept, BNI Emerald Center Pampers Premium Customers
365	December 2, 2024	Royke Tumilaar - CEO OF THE YEAR 2024, Becomes an Influential Figure in the Indonesian Banking Industry
366	December 3, 2024	BNI Involves People with Disabilities as Agent 46
367		World Badminton Stars and Sheila On 7 Enliven wondr by BNI Bright Up Cup 2024
368	December 4, 2024	BNI Hi-Movers, Let's Take a Peek at the Excitement of wondr by BNI BrightUp Cup 2024!
369	December 5, 2024	BNI and Bumi Siak Pusako Collaborate to Provide Employee Retirement Solutions
370		Present at Borobudur, BNI Promotes Nusantara Culture Through Plataran Xtravaganza
371		BNI Ventures Partners with IPB to Develop Startup Ecosystem
372	December 6, 2024	Recognized as a Global Bank, BNI Wins Two Prestigious International Awards from Corporate Treasurer
373	December 7, 2024	Supporting East Java's Economic Growth, BNI is Closer to Business Actors in Surabaya
374		Supporting Financial Inclusion, BNI Participates in Celebrating International Day of Persons with Disabilities 2024
375	December 9, 2024	BNI Hi-Movers Anti-Corruption
376	December 11, 2024	Through Diapora Loan, BNI Helps Indonesian Diaspora in Hong Kong Move Up a Class
377	December 12, 2024	BNI Wins 5 Awards from Bank Indonesia, Best Bank in Rupiah Money Market to Inclusive Financing
378		Supporting Sugar Self-Sufficiency 2028, BNI and Sinergi Gula Nusantara Collaborate to Distribute KUR to Sugarcane Farmers
379	December 13, 2024	Commitment to Implement Good Corporate Governance
380		Strengthening Digital Banking and International Network, BNI Named the Best Transformation Bank
381		BNI's Efforts to Support the Government in Achieving Net Zero Emissions 2060
382	December 16, 2024	Intensifying Education and Literacy, BNI Again Receives an Award from Bank Indonesia
383		Innovative in Campus Services, BNI Wins the Most Innovative Bank for Digital Campus Transformation Award
384	December 19, 2024	BNI Moves Quickly to Distribute Aid to Sukabumi Disaster Victims
385	December 20, 2024	Consistently Implementing Information Transparency, BNI Wins Informative BUMN from the Central Information Commission
386	December 20, 2024	Supporting Financial Inclusion, BNI Participates in Celebrating International Day of Persons with Disabilities 2024
387	December 20, 2024	BNI Prepares IDR 19.74 T in Cash, Ensures Comfortable and Safe Transactions during Christmas and New Year.
388	December 22, 2024	Happy National Mother's Day

No	Date	Title
389	December 22, 2024	Increase Coffee Farmer Productivity, BNI Explores Equatorial Coffee Present in Temanggung
390	December 23, 2024	Celebrate the Joy of Christmas with Full Hope, Journey to Wondrous Hope
391	December 23, 2024	BNI Launches New BNI My Pertamina Credit Card Product, Buy Fuel and Get Cashback
392	December 25, 2024	Merry Christmas and Happy New Year 2025
393	December 28, 2024	BNI Creates Innovation Hub in Sarinah Building, Birthplace of wondr by BNI

INTERNAL COMMUNICATION MEDIA

The use of technology in internal communication is crucial to support the effectiveness of information delivery at BNI. Therefore, BNI utilizes various internal communication tools, such as WhatsApp, email, and BNI Menyapa SMS, to disseminate information to all employees. These communication tools cover several types of information, including:

1. Newsletter, which contains bank-wide corporate information and high-level content conveyed by the Board of Directors;
2. Corporate Info, which includes more technical, bank-wide corporate information conveyed by the KMP Division;
3. Human Capital Information, which is technical and needs to be delivered promptly by the HCS and HCE Divisions; and
4. Other Information, which is bank-wide but not related to marketing, products, or services.

Throughout 2024, BNI Menyapa e-mails were recorded at 255. Below is a list of topics covered in the BNI Menyapa emails:

No	Date	Subject E-mail
1	January 3, 2024	BNI Menyapa - Presentation of BNI Cooperation & Master of Economics Program, Faculty of Economics and Business, Trisakti University
2	January 4, 2024	BNI Menyapa - SAMSUNG Galaxy Unpacked Get Interesting Offers with BNI Cards
3	January 9, 2024	BNI Menyapa - Increase UMKM Go Global, BNI Berbagi Provides Halal Certification Assistance and On Boarding Training for 422 Culinary UMKM
4	January 11, 2024	BNI Menyapa - Power Lunch Money Talks: Opening Up About Today's Banking Style
5	January 13, 2024	BNI Menyapa - Because of Ignoring the Balance in Your Account, It Can End Up Goodbye
6	January 14, 2024	BNI Menyapa - Presentation of Master of Management Program (S2) Faculty of Economics and Business, Trisakti University
7		BNI Menyapa - Provide a Different Experience, BNI Inaugurates UI Depok Branch Office
8	January 17, 2024	BNI Menyapa - Fake Job Applications End in Sorrow
9	January 18, 2024	BNI Menyapa - Leaders Talk Series: Optimizing Organizational Transformation Through Strategic Delegation
10	January 26, 2024	BNI Menyapa - First Day of Indonesian Master 2024, Indonesia Reaps Victory
11	January 30, 2024	BNI Menyapa - Three Years of Transformation, BNI Produces Solid and Quality ROE
12	February 5, 2024	BNI Menyapa - Indonesia Incorporated Day: BNI is Committed to Continuously Encouraging Diaspora Potential
13		BNI Menyapa - Implementing CSR Programs, BNI and the DKI Jakarta Provincial Government Inaugurate Swadharma Shop for Street Vendor Management
14	February 6, 2024	BNI Menyapa - Boosting the Local Product Market, BNI Provides Vending Machines for Fostered MSMEs
15	February 15, 2024	BNI Menyapa - BNIdirect Webinar: Selling With Confidence: Unraveling the Secrets of BNIdirect
16		BNI Menyapa - Improving Teacher Competence, BNI Shares Teacher Certification
17	February 19, 2024	BNI Menyapa - 0% Installment Conversion Program for Staff Credit Card Holders BNI
18		BNI Menyapa - Fulfill the Promise of the Future with ORI025!
19	February 20, 2024	BNI Menyapa - BNI FOLK Campaign
20	February 21, 2024	BNI Menyapa - Bandung Institute of Technology Public Lecture "Become an Entrepreneur"

No	Date	Subject E-mail
21	February 23, 2024	BNI Menyapa - Travel Compilation Promo
22		BNI Menyapa - ITB Studium Generale, BNI President Director Encourages Young Generation to Become Entrepreneurs
23	February 24, 2024	BNI Menyapa - Carrying the Green Building Concept, BNI Builds Office Buildings in the PIK 2 Area
24	February 25, 2024	BNI Menyapa - Financial Planning Education for Hongkong's Diaspora
25	February 26, 2024	BNI Menyapa - Traveloka Travel Fair Event (26 Feb - 3 Mar 2024)
26		BNI Menyapa - Tiket.com OTW Gledek Promo (26 Feb - 6 Mar 2024)
27		BNI Menyapa - BNI CorpU TV Knowledge Supplement "Smart People, Choose Tapenas: The Right Strategy for Saving and Buying Insurance for the Future"
28	February 29, 2024	BNI Menyapa - BNI Distributes Financing for the Indonesian Diaspora in Hong Kong
29		BNI Menyapa - Supporting Inacraft 2024, BNI Encourages MSMEs to Go Global
30		BNI Menyapa - BNI x INACRAFT 2024
31		BNI Menyapa - Monthly Newsletter WDC
32	March 1, 2024	BNI Menyapa - Winner of the K-Store Challenge Program
33	March 5, 2024	BNI Menyapa - Distributing 50% Dividends, BNI is Optimistic that Performance Will Be More Positive in 2024
34		BNI Menyapa - Appreciation of 2023 Performance Achievements
35		BNI Menyapa - Promo Buy 1 Get 2 BNI JJF 2024
36	March 6, 2024	BNI Menyapa - Leaders Talk Series: Fostering a Global Mindset Toward Future Business Ecosystem
37	March 7, 2024	BNI Menyapa - Launching the National Transaction Champion Program 2024
38		BNI Menyapa - Monthly Newsletter WDC
39	March 8, 2024	BNI Menyapa - BNI Wins Three ESG Awards
40		BNI Menyapa - BNI Exporters Forum Supports MSMEs to Penetrate the Global Market
41	March 13, 2024	BNI Menyapa - Get Closer Into New System Development Life Cycle (SDLC)
42	March 14, 2024	BNI Menyapa: Supplement Knowledge BNI CorpU TV "Global Series #1" Introduction to Global Culture and Its Impact on Business
43		BNI Menyapa - Special Promo at Samsung EPP with BNI Credit Card
44	March 15, 2024	BNI Menyapa - Shopping for Anything is Easier with 0% Installments on BNI Credit Card
45	March 18, 2024	BNI Menyapa - BNI x UNIQLO Ramadan Campaign 2024
46		BNI Menyapa - SR020 Investment in BNI Mobile Banking
47	March 21, 2024	BNI Menyapa - Ramadhan Strengthens Social Harmony
48		BNI Menyapa - Presentation of Master of Management Program (S2) Faculty of Economics and Business, Trisakti University
49	March 22, 2024	BNII Menyapa - Ramadhan Strengthens Social Harmony
50		BNI Menyapa - Presentation Master of Management Program (S2) Faculty of Economics and Business, Trisakti University
51	March 25, 2024	BNI Menyapa - K-Store Challenge Program 2024
52	March 26, 2024	BNI Menyapa - Anti Fraud Awareness "Social Engineering: Definition, Types and How to Prevent It"
53		BNI Menyapa - Safari Ramadan 2024, BNI Shares 78,000 Food Packages and Assistance
54		BNI Menyapa - WDC Newsletter Feb Wrap up - Vol 2 issue March
55	March 27, 2024	BNI Menyapa - BUMN Safari Ramadan 2024 Held, Providing Cheap Basic Necessities to Free Homecoming
56		BNI Menyapa - Realizing Collaboration, SP BNI Celebrates 25th Anniversary and Holds Inauguration of Roemah Aspirasi
57	March 28, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Ramadan Spiritual Lecture
58		BNI Menyapa - Encouraging the Development of Startups and Digital Ecosystems, BNI Ventures Injects Funds into Rukita
59	April 1, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Ramadan Spiritual Lecture "Harmony and Tolerance in the Holy Month"
60	April 2, 2024	BNI Menyapa - "Money Talks Power Lunch": Success Story of Global Bond Issuance & BNI Transformation Facing Challenges in 2024
61	April 3, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement "Implementation of the Personal Data Protection Law (PDP) at BNI"
62		BNI Menyapa - Wonderful Ramadan, BNI Shares Happiness on the Night of Nuzulul Quran
63	April 4, 2024	BNI Menyapa - BNI Wins 18 Awards at the 13th Infobank-Isentia Digital Brand Recognition 2024

No	Date	Subject E-mail
64	April 5, 2024	BNI Menyapa - WDC March Wrapped Newsletter-Vol 3 Issue April 2024
65	April 6, 2024	BNI Menyapa - Commitment to Implementing Good Corporate Governance
66	April 16, 2024	BNI Menyapa - BNI Helps Specialty Coffee Products of Xpora's Fostered MSMEs Penetrate the American Market
67	April 18, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Digital Trend and Skill Series #2
68	April 19, 2024	BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards
69	April 22, 2024	BNI Menyapa - Indonesia Wins All England and BAC, BNI Appreciates and Supports Thomas & Uber Cup Teams
70	April 23, 2024	BNI Menyapa - Global Mindset Series #2 Building Collaborative Teams and Customer/Client Relationships
71	April 30, 2024	BNI Menyapa - Printing Credit Growth Amidst Global Dynamics, MSME and Consumer Segments Become BNI's New Growth Engines
72		BNI Menyapa - BNI and Telkomsel Strengthen Synergy Through Reciprocal Cooperation to Employees
73	May 2, 2024	BNI Menyapa - BNI and UNDIP Synergize, Strengthen Campus Financial Ecosystem
74		BNI Menyapa - Supporting Green Energy Transition, BNI Funds Sidrap PLTB Acquisition by Barito Group
75	May 3, 2024	BNI Menyapa - Investing for a Prosperous Future with ST012!
76		BNI Menyapa - BNI Provides Financing Solutions for Business Actors through Supply Chain Financing
77	May 6, 2024	BNI Menyapa - BNI Java Jazz on The Move Special Edition is Back! Natasya Elvira to Fariz RM and Candra Darusman Ready to Enliven the Event
78	May 7, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Mastering Territory Management in Retail Business "Strategic and Insights From Industry Experts'"
79	May 8, 2024	BNI Menyapa - BNI Welcomes the Return of the Thomas and Uber Indonesia Teams to Indonesia
80	May 14, 2024	BI Menyapa - Special Promo at Dyson EPP with BNI Credit Cards
81		BNI Menyapa - Consistently Supporting SMMPTN-West 2024, BNI Collaborates with 25 PTN
82	May 15, 2024	BNI Menyapa - BNI Strengthens Synergy with the Indonesian Army Through the Provision of Banking Services
83	May 19, 2024	BNI Menyapa - BNI Amsterdam Further Optimizes BNI's Business in Europe
84	May 21, 2024	BNI Menyapa - Webinar Series on PDP Law - Data Privacy and Data Protection Awareness
85		BNI Menyapa - WDC April Wrap up Newsletter - Vol 4 Issue May
86	May 22, 2024	BNI Menyapa - Anti Fraud Awareness Webinar - Avoid Online Gambling and Illegal Online Loans
87	May 24, 2024	BNI Menyapa - Held in Bali, BNI Fully Supports World Water Forum 2024
88		BNI Menyapa - Presenting Wondrful Music Experiences, BNI Java Jazz Festival 2024 Held for 3 Days in Kemayoran
89	May 25, 2024	BNI Menyapa - BNI Supports BUMN Volunteer Services to Samboja and IKN, Rehabilitating Orangutans and Mangroves
90		BNI Menyapa - BNI Strengthens Synergy with IKN Authority, Provides Integrated Banking Services
91		BNI Menyapa - Supporting Startup Development, BNI Ventures Injects Funds into Fishlog
92	May 28, 2024	BNI Menyapa - Xpora Series 2024 Webinar: Stepping into the International Market with Xpora
93	May 30, 2024	BNI Menyapa - USS Wave-1 in 2024
94	June 3, 2024	BNI Menyapa - BNI Invites Emerald Customers to Get to Know Environmentally Friendly Vehicles Closer
95		BNI Menyapa - BNI Holds BNI Exporters Forum in Bandung, Encourages SMEs to Penetrate the Global Market
96	June 4, 2024	BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards
97		BNI Menyapa - Posts Positive Performance in Q1 2024, BNI finance is optimistic that growth will continue until the end of the year
98	June 5, 2024	BNI Menyapa - Watch the "Power Lunch" program on the CNBC channel with Mr. Royke Tumilaar
99		BNI Menyapa - BNI Finance Director Wins "The Most Inspiring Woman Leader" Award from CNBC Indonesia
100	June 10, 2024	BNI Menyapa - BNI is Ready to Spread Interesting Promos at the 2024 Jakarta Great Sale Festival
101	June 12, 2024	BNI Menyapa - RACE Talk Series: Creating Impactful Innovation through Culture Transformation
102	June 13, 2024	BNI Menyapa - Governance, Risk & Compliance (GRC) Series #1: "Risk Mitigation through Cyber Security Strategy"
103	June 14, 2024	BNI Menyapa - Agen46 Webinar Series 2: Strong Features, Increased Profits
104		BNI Menyapa - BNI Awards Performance Excellence Award (PEXA) 2024

No	Date	Subject E-mail
105	June 15, 2024	BNI Menyapa - BNI Opens Limited Services on Eid al-Adha 1445 H
106	June 19, 2024	BNI Menyapa - Strengthening Financial Literacy and Inclusion, BNI Educates the Community on Waste Management
107	June 20, 2024	BNI Menyapa - Strengthening Financial Literacy and Inclusion, BNI Educates the Community on Waste Management
108		BNI Menyapa - Healthy Talk Series: Early Detection of Pinched Nerve Risks and Handling with the Latest Technology
109	June 21, 2024	BNI Menyapa - Realizing Shared Dreams with SBR013! Safe and Profitable Investment!
110		BNI Menyapa - WDC April Wrap up Newsletter - Vol 5 June Issue
111	June 24, 2024	BNI Menyapa : BNI x Mommy & Me 2024
112	June 28, 2024	BNI Menyapa : Knowledge Supplement BNI CorpU TV : Webinar BNI Xpora Series "Potential for Indonesian SME Exports to the Land of Windmills, the Netherlands with Xpora"
113		BNI Menyapa - Knowledge Supplement BNI CorpU TV : Podcast Fit Series "FronlineRevolution & Inspiring Talk (FIT) Session 1-3 Area Head
114	June 29, 2024	BNI Menyapa - Wisely Managing Finance and Investment Through Financial Education and Public Information Disclosure
115	July 1, 2024	BNI Menyapa - BNI Accelerates Diaspora-Owned Businesses in Japan\
116		BNI Menyapa - Holding Financial Education and Information Disclosure, BNI Introduces DigiRemit Application in Japan
117	July 3, 2024	BNI Menyapa - BNI Collaborates with Cloudera to Accelerate Transformation through Generative AI Implementation
118		BNI Menyapa - Wondrful Celebration for 78Th BNI
119		BNI Menyapa - BEE BNI Employee Excellence Award 2024
120	July 5, 2024	BNI Menyapa - BNI's 78th Anniversary Celebration "Leading a Wondrous Nation"
121		BNI Menyapa - Launching & Presscon wondr by BNI
122	July 8, 2024	BNI Menyapa - BNI Launches wondr by BNI, Supports Indonesian People to Realize Financial Dreams
123		BNI Menyapa - Appreciation of Hi-Movers, at the Peak of the 78th Anniversary Celebration, BNI Holds Loudfest 2024 at GBK
124	July 9, 2024	BNI Menyapa - Support Your Dream Future with BNI
125	July 11, 2024	BNI Menyapa - Digitalization Era: Disruption or Opportunity to Transform?
126		BNI Menyapa - BNI Inaugurates Integrated Service Unit at ITB, Strengthens Campus Financial Ecosystem
127	July 19, 2024	BNI Menyapa - BNI Inaugurates Integrated Service Unit at ITB, Strengthens Campus Financial Ecosystem
128	July 22, 2024	BNI Menyapa - Webinar Xpora Series 2024: "Opportunities & Challenges for Exporting Indonesian SME Commodities to East Asian Countries with the Indonesian Ministry of Foreign Affairs & Xpora
129		BNI Menyapa - BNI Celebrates 78th Anniversary by Launching wondr by BNI and Holding BNI Expo 2024
130	July 23, 2024	BNI Menyapa - BNI's 78th Anniversary Presents BNI Expo 2024
131		BNI Menyapa - Developing the Campus Financial Ecosystem, BNI and Telkom University Collaborate to Create Integrated Payments
132	July 24, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Forming an Export-Oriented Coffee Ecosystem
133		BNI Menyapa - BNI Reappointed as RDN Administrator and Payment Bank
134	July 26, 2024	BNI Menyapa - WDC Newsletter June Wrap up - Vol 5 Issue July
135	July 31, 2024	BNI Menyapa - Visit BNI EXPO 2024, Find Out How to Own a Dream Home, Vehicle and Picnic Easily and Attractively
136		BNI Menyapa - BNI and Indosat Establishes Partnership, Provides Financial Services and Information Technology
137	August 2, 2024	BNI Menyapa - Opening Today in BSD, BNI Expo 2024 Offers Attractive Promos and Enjoy a Wondrful Journey
138	August 5, 2024	BNI Menyapa - Healthy Talk Series: "Prevent and Recognize Kidney Failure in Children Early"
139		BNI Menyapa - BNI Launches Co-Branding Credit Card with MAPCLUB
140	August 8, 2024	BNI Menyapa - BNI Expo 2024 Successfully Held, Tens of Thousands of Visitors Enjoyed the Wondrful Journey
141	August 9, 2024	BNI Menyapa - The Existence of BNI Agen46 in the Digital Era
142		BNI Menyapa - Support Your Dream Future with BNI

No	Date	Subject E-mail
143	August 12, 2024	BNI Menyapa - PDP Series 2 Socialization Webinar - Data Privacy Awareness and Data Protection
144		BNI Menyapa - Winner of the 1 Month K-Store Challenge Program
145	August 14, 2024	BNI Menyapa - Realizing an Anti-Corruption Culture through Instilling Integrity Values
146	August 19, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: BNI PKB Signing Ceremony for 2024
147		BNI Menyapa - BNI and Mercubuana University Collaborate to Improve the Campus Financial Ecosystem
148		BNI Menyapa - BNI-UI Half Marathon 2024 is Back, Join the Excitement and Get Interesting Promos
149	August 20, 2024	BNI Menyapa - Commemorating National Housing Day 2024, BNI Supports Greening in IKN
150		BNI Menyapa - President Jokowi Visits BNI Digital Banking Cafe, Access to Banking Services is Easier and More Convenient in IKN
151	August 21, 2024	BNI Menyapa - BNI Xpora Holds BNI Exporters Forum in Makassar, Encourages SMEs to Go Global
152		BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards
153	August 28, 2024	BNI Menyapa - BNI Bazaar Fest Vol 3
154	August 29, 2024	BNI Menyapa - Master Literacy, Increase Transaction Security
155	August 30, 2024	BNI Menyapa - WDC Newsletter July Wrap up - Vol 7 Issue August
156	September 2, 2024	BNI Menyapa - Making Transactions More Exciting, Wondr by BNI Usage Increases 200%
157		BNI Menyapa - Establishing Cooperation, BNI Provides Banking Products and Services for Bappenas
158	September 4, 2024	BNI Menyapa - Enlivening National Customer Day "wondrful Customers, Make Your Wishes Happen"
159		BNI Menyapa - There is BNI's Support Behind the Indonesia Africa Forum (IAF), Optimizing Global Business Cooperation
160	September 5, 2024	BNI Menyapa - Order SR021, Safe Investment, Source of Passive Income
161		BNI Menyapa - BNI Introduces the New Look New Image Concept on National Customer Day 2024
162	September 6, 2024	BNI Menyapa - BNI Inaugurates Representative Office in Sydney, Becoming the First Indonesian Bank in Australia
163		BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards
164	September 12, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: BNI Supports Gernas BBI/BBWI North Maluku to Go Global
165		BNI Menyapa - Order SR021, Safe Investment, Source of Passive Income
166	September 15, 2024	BNI Menyapa - Realizing an Inclusive Economy and Digitalization of MSME Financing Access, BNI Collaborates with Amartha
167		BNI Menyapa - Followed 10,000 Runners, BNI UI Half Marathon 2024 Successfully Held
168	September 17, 2024	BNI Menyapa - BNI Ventures Bridges Startups and Banking Through Match Arc Program
169		BNI Menyapa - BNI Penetrates List of 1,000 Best Companies in the World 2024, According to TIME and Statista
170		BNI Menyapa - Collaboration between BNI and IKA Trisakti, Expands Campus Financial Ecosystem Program
171	September 19, 2024	BNI Menyapa - Collaboration between BNI and IKA Trisakti, Expands Campus Financial Ecosystem Program
172		BNI Menyapa - BNI CorpU TV Knowledge Supplement: Maximizing Ecosystem "Exploring BNI Business Opportunities in the Health, Education and Area Management Sectors"
173	September 20, 2024	BNI Menyapa - Implementing Transparent Sustainability Reports, BNI Wins Republika ESG Award 2024
174		BNI Menyapa - Maximizing Beauty with BNI
175		BNI Menyapa - SATURDAYS Discount Promo
176		BNI Menyapa - PDP Series 3 Socialization Webinar - Data Privacy Awareness and Data Protection
177	September 23, 2024	BNI Menyapa - BNI and AOP Collaborate, Indonesia Will Become the First Global Pop Idol Center in Southeast Asia
178	September 24, 2024	BNI Menyapa - BNI Named as the Most Trusted Bank in the World Most Trustworthy Companies 2024 by Newsweek and Status ta for the Bank Category
179	September 27, 2024	BNI Menyapa - Supporting the Green Transition in the Energy Sector, BNI Holds BEST Event
180	September 28, 2024	BNI Menyapa - BNI Records 27% Asset Growth in 5 Years, Supported by Digital Transformation and Strategic Expansion

No	Date	Subject E-mail
181	October 1, 2024	BNI Menyapa - BNI Investor Daily Summit 2024: Accelerating Indonesia's Economic Growth in the Transition Period
182		BNI Menyapa - BNI CorpU TV Knowledge Supplement: "SkillUp Program Socialization! (Learn Soft Skills and Hard Skills) & BUMN Learning Festival Program"
183	October 2, 2024	BNI Menyapa - "Money Talks Power Lunch" Digitalization is Getting Faster, BNI is Optimistic that Business Will Continue to Grow Positively
184	October 3, 2024	BNI Menyapa - Present Again #DiIndonesiaAja LPS Travel Fair 2024 (DIATF)
185		BNI Menyapa - Supporting Inacraft on October Vol.3, BNI Encourages the Young Generation to Become Entrepreneurs
186	October 4, 2024	BNI Menyapa - Race Talk Series: "Future Generation of Credit Retail Experience"
187	October 5, 2024	BNI Menyapa - BNI Spreads Interesting Promos at #DiIndonesiaAja LPS Travel Fair 2024
188	October 8, 2024	BNI Menyapa - Time to Invest for Mutual Prosperity
189	October 9, 2024	BNI Menyapa - BNI Investor Daily Summit 2024 BNI Encourages Business Competitiveness with AI and Cloud-Based Digital Transformation
190		BNI Menyapa - BNI Investor Daily Summit 2024: Optimism Amidst Various Global Challenges
191	October 10, 2024	BNI Menyapa - SkillUp Program! Learning Foreign Languages "The Importance of Foreign Language Proficiency in Enhancing Global Careers"
192		BNI Menyapa - BNI Expands Business in Tourism and Health Sectors, Boosts Economic Growth
193	October 11, 2024	BNI Menyapa - Shopping for Anything Becomes Easier with 0.5% Installments on BNI Credit Cards
194	October 17, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Potential for Indonesian SME Exports to the Land of Kangaroos, Australia with Atdag Canberra & Xpora"
195	October 18, 2024	BNI Menyapa - BNI and BPJS Kesehatan Expand Cooperation to Improve National Health Services
196		BNI Menyapa - BNI and Bluebird Strengthen Payment Digitalization with QRIS across Bluebird Fleet
197	October 21, 2024	BNI Menyapa - BNI CorpU TV Knowledge Supplement: Accurate Execution of BNI Agent 46 Management
198		BNI Menyapa - USS Wave-2 in 2024
199		BNI menyapa - Easier, Company Guidelines Can Be Accessed Via Mobile Phones
200	October 23, 2024	BNI Menyapa - Click and Collect at Watsons ID Discount IDR 25K
201	October 25, 2024	BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards
202	October 29, 2024	BNI Menyapa - Digitalization Boosts Revenue Operational, BNI Profit Reaches IDR 16.3 Trillion in Q3-2024
203		BNI Menyapa - WDC Newsletter August & September Wrap up - Volume 8 Issue: October
204	October 30, 2024	BNI Menyapa - Exceeding Industry Average, BNI Mortgage Distribution Grows 13% in Q3-2024
205	November 1, 2024	BNI Menyapa - BOD-2 Leaders Development Mission: Strategic People Leaders with Core Values AKHLAK
206		BNI Menyapa - Compete for a Total Prize of US$2 Million, World Elite Golfers Enliven BNI Indonesian Masters 2024
207	November 2, 2024	BNI Menyapa - Exceeding Industry Average, BNI Mortgage Distribution Grows 13% in Q3-2024
208	November 4, 2024	BNI Menyapa - USS Wave-2 in 2024
209		BNI Menyapa - BNI CorpU TV Wellbeing Parenting Series Knowledge Supplement "The Importance of Routines in Children's Lives"
210		BNI Menyapa - USS Wave-2 2024
211	November 9, 2024	BNI Menyapa - Improving Digital Literacy, BNI Invites UKSW Salatiga Students to Become a Financially Smart Generation
212	November 10, 2024	BNI Menyapa - BNI Digital Banking Cafe Present in Bali, Enjoy the Beauty of Mount Batur While Making Transactions
213	November 12, 2024	BNI Menyapa - Get Cash Rewards Up to 3.5 Million by Referring BNI MAPCLUB Credit Card
214		BNI Menyapa - BNI CorpU TV Knowledge Supplement: "Potential for Indonesian SME Exports to the Blue Dragon Country, Vietnam with Hanoi Trade Attaché & Xpora"
215	November 13, 2024	BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards
216	November 14, 2024	BNI Menyapa - BNI CULTURE FEST 2024
217		BNI Menyapa - E-Book "Transform or Disappear" - Provisions for Hi-Movers Towards the Future!
218	November 15, 2024	BNI Menyapa - Next Gen BNI Ecosystem: Optimizing Business Potential Through Digital Ecosystem Solutions
219	November 18, 2024	BNI Menyapa - Stress Management to Increase Productivity - Stress-Free Tips & Tricks at Work
220	November 19, 2024	BNI Menyapa - BNI's Digitalization and Expansion Abroad Receive Praise from DPR Members

No	Date	Subject E-mail
221	November 20, 2024	BNI Menyapa - Completing the Dukuh Atas-Sudirman TOD Ecosystem, BNI Inaugurates Naming Rights
222		BNI Menyapa - Completing the Dukuh Atas-Sudirman TOD Ecosystem, BNI Inaugurates Naming Rights "Stasiun Dukuh Atas BNI" LRT Jabodebek
223		BNI Menyapa - Supporting the World of Education, BNI Hands Over Teacher Training and Financial Literacy Certificates for Students
224	November 21, 2024	BNI Menyapa - Winning Best Employer Brand on LinkedIn Talent Awards Indonesia 2024, BNI Leads the Future of the World of Work
225	November 22, 2024	BNI Menyapa - Learning the Potential of QIOS46 Business (BNI Agen46 and Toko Mandiri Indogrosir)
226		BNI Menyapa - Strengthening Commitment as an Agent of Development, BNI Partners with Batumbu to Expand Financing Access for MSMEs
227		BNI Menyapa - Wins Gold Rank ASRRAT for 4 Consecutive Years, Proof of BNI's Commitment to Implementing Sustainable Finance
228	November 25, 2024	BNI Menyapa - BNI Optimizes Digital Services to Make it Easier for Manulife Customers to Pay Premiums
229		BNI Menyapa - "Learning the Potential of QIOS46 Business (BNI Agen46 and Toko Mandiri Indogrosir)"
230		BNI Menyapa - "Next Gen BNI Ecosystem: Optimizing Business Potential Through Digital Ecosystem Solutions"
231	November 28, 2024	BNI Menyapa - Consistently Improving the Quality of GCG Implementation, BNI Again Wins the Title of 'The Best Overall in Corporate Governance'
232		BNI Menyapa - BNI Wins the Title of "The Most Trusted Companies" at the 2024 Corporate Governance Perception Index Award
233	November 29, 2024	BNI Menyapa - Beginner Content Creator Class - Step by Step Introduction to Content Creation
234		BNI Menyapa - WDC October Wrap up Newsletter - Volume 9 Issue: November
235	December 6, 2024	BNI Menyapa - Recognized as a Global Bank, BNI Wins 2 International Prestigious Award from Corporate Treasurer
236		BNI Menyapa - Shopping for Anything Becomes Easier with 0% Installment of BNI Credit Card
237	December 9, 2024	BNI Menyapa - BNI Blocks 4,249 Accounts Indicated as Online Gambling
238		BNI Menyapa - BNI Mastercard World Comes with New Design and Features, Life is Healthier, Traveling is More Exciting
239	December 10, 2024	BNI Menyapa - BNI Becomes Main Partner for Upper Class Customers to Manage Wealth
240	December 11, 2024	BNI Menyapa - Through Diaspora Loan, BNI Helps Indonesian Diaspora in Hong Kong to Level Up
241		BNI Menyapa - BNI's Efforts to Support the Government to Achieve Net Zero Emissions 2060
242	December 13, 2024	BNI Menyapa - Becoming the Best Bank in Rupiah Money Market to Inclusive Financing, BNI Wins 5 Awards from Bank Indonesia
243		BNI Menyapa - Commitment to Implementing Good Corporate Governance
244	December 18, 2024	BNI Menyapa - BNI's Efforts to Support the Government to Achieve Net Zero Emissions 2060
245	December 19, 2024	BNI Menyapa - Announcement of JIBOR Transition Information Towards IndONIA
246	December 19, 2024	BNI Menyapa - Webinar "Equal Education in Work: People with Disabilities Become BNI Agen46"
247	December 20, 2024	BNI Menyapa - Supporting the Work of People with Disabilities, BNI Head Office Displays Paintings by 7 Young Visual Artists
248	December 21, 2024	BNI Menyapa - BNI Provides Explanation Regarding Sritex's Bankruptcy Status
249	December 23, 2024	BNI Menyapa - Consistently Implementing Information Transparency, BNI Wins Informative BUMN from the Central Information Commission
250	December 23, 2024	BNI Menyapa - Increasing Coffee Farmer Productivity, BNI Equatorial Coffee Exploration Present in Temanggung
251	December 24, 2024	BNI Menyapa - BNI Prepares IDR 19.74 T in Cash to Ensure Comfortable and Safe Transactions during Christmas and New Year
252	December 27, 2024	Supporting MSMEs Go Global, BNI Partners with PT Pos to Strengthen Logistics and Financing Ecosystem
253	December 27, 2024	BNI Menyapa - Webinar "Early Warning Systems: Detecting and Preventing Liquidity Risks"
254	December 30, 2024	BNI Menyapa - Digital Transformation, DPLK BNI Presents with New Website
255	December 30, 2024	BNI Menyapa - Newsletter WDC November Wrap up - Volume 10 Issue: December

Meanwhile, BNI Menyapa through WhatsApp application was recorded to have been conducted 2 times throughout 2024, with the following topics:

No.	Date	Topic
1	July 5, 2024	BNI Loudfest 2024 To celebrate the 78th anniversary of BNI Leading a Wondrous Nation, as well as the launch of the new banking app wondr by BNI, let's make social media more colorful by using twibbon simultaneously on Friday, July 5, 2024 at 06.00 WIB. Twibbon can be used by clicking the twibbon link, uploading the most interesting photo, downloading the results, then directly uploading them to each BNI Hi-Movers' social media simultaneously on July 5, 2024 at 06.00 WIB. Make sure the Twibbon you created is posted on social media to enliven BNI's 78th Anniversary and the presence of wondr by BNI. Happy 78th Anniversary of BNI and welcome wondr by BNI to the BNI Group family. Twibbon can be accessed below!
2.	August 2, 2024	BNI Expo 2024 - wondrful journey BNI Hi-Movers, ready to make your wishes come true from A to Z at BNI Expo 2024! BNI's 78th Anniversary Special, enjoy various attractive promos! Want to buy your dream car and house, there's a special interest rate starting from 1.78% p.a. Need quick funds? You can get BNI Flexi Collateral-Free Credit with interest starting from 7.8% p.a. Want a cheap vacation? Get flight tickets at special prices for domestic and international routes starting from IDR 78 thousand and cashback up to IDR 7.8 million and a bonus of 1,000 miles! Want to shop for this and that? It's definitely more exciting with cashback up to IDR1.78 million. You can also enjoy special performances from Rizky Febian, Lyodra, et al and get prizes worth hundreds of millions of rupiah! Save the date & place! August 2-4, 2024 ICE BSD City, Hall 1-3A Free Entry Download wondr by BNI and make your wishes come true. Info: bit.ly/PROMO-BNIEXPO2024 Come to BNI Expo 2024 and enjoy various wonderful experiences!

E-SINERGI 46

In building effective internal communication and to foster a sense of pride as part of the BNI family, the Bank provides an internal communication platform in the form of the E-Sinergi 46 application which can only be accessed by BNI Hi-Movers personnel in the form of mobile apps and web-based, which can be downloaded on the Google Play Store and App Store. This application presents content in various formats, including text, photos, and videos, thus providing variation in the delivery of information.

To be able to attract more downloaders on the e-sinergi46 Application, BNI continues to innovate in presenting interesting content, including by presenting a gamification program that offers reward points. With the implementation of this program, every activity carried out through the application will generate points that can be exchanged for various useful purposes, such as purchasing credit, data packages, vouchers, paying PLN bills, and top ups for Link Aja, GoPay, and OVO. In addition, the E-Sinergi 46 manager also provides incentives to employees who contribute to sending news from each work unit. In this way, E-Sinergi 46 not only functions as a means of sharing information, but also encourages employees to be more active in participating, creating a community that is interconnected and shares knowledge.

Throughout 2024, E-Sinergi 46 has recorded 434 news items, namely:

No.	Date	Headline	Number of Accesses/ Downloads
1	January 1, 2024	Happy New Year 2024	73
2	January 2, 2024	BNI Optimistic Transaction Business Performance Will Be Even More Brilliant in 2024	50
3		BNI President Director Ready to Continue Positive Achievements in 2024	55
4	January 3, 2024	SAMSUNG Galaxy Unpacked Get Interesting Offers with BNI Cards	70
5	January 4, 2024	Increase UMKM Go Global, BNI Berbagi Provides Halal Certification Assistance and On Boarding Training for 422 Culinary UMKM	65
6	January 5, 2024	BNI Berbagi, Distributes Emergency Response Assistance for the Lewetobi Volcanic Eruption in Flores	45
7		Optimistic in Welcoming 2024, BNI Plans to Open 2 New Overseas Offices	66
8	January 6, 2024	Watch Out! Scams of Prize Draw Programs in the Name of BNI Are Rampant	78
9	January 8, 2024	Welcoming 2024, Listen to the Message from the President Director of BNI	89
10	January 9, 2024	Forging Friendship, BNI HI-Movers Gets Friendly with Directors and Retired Personnel	99
11	January 10, 2024	Power Lunch Money Talks: Opening Up About Today's Banking Style	114

No.	Date	Headline	Number of Accesses/ Downloads
12	January 11, 2024	BNI AM Presents Innovation of Sharia Mutual Fund Products in BNI Mobile Banking	123
13	January 12, 2024	Ignoring the Balance in Your Account Can End in Goodbye	76
14	January 13, 2024	Fake Job Applications End in Sorrow	87
15	January 14, 2024	Providing a Different Experience, BNI Inaugurates UI Depok Branch Office	98
16	January 17, 2024	99% of Transactions Accommodated Digitally, BNI Transforms Office Network	91
17	January 19, 2024	Recording 7.5 Times Sales Growth in 2023, BNI Finance is Optimistic to Face 2024	45
18	January 22, 2024	Increasing Financial Literacy, BNI and OJK Invite Students to Get to Know the SiMuda Program	88
19		Christmas with the Ministry of SOEs, the Spirit of Peace for Us to Continue to Rise & Progress with SOEs	57
20	January 24, 2024	Watch Out! Fake Draw Using BNI Name Targets Social Media Users	82
21		First Day of Indonesian Master 2024, Indonesia Reaps Victory	86
22	January 25, 2024	BNI CorpU TV Knowledge Supplement: Leadership Development and Organizational Resilience in the Transforming Industry	77
23	January 26, 2024	Three Years of Transformation, BNI Produces Solid and Quality ROE	74
24	January 30, 2024	Men's Doubles Win, BNI Appreciates the Achievements of Indonesian Badminton Athletes at the 2024 Indonesia Masters	21
25		Enjoy the Convenience of BI-Fast Interbank Transfers with BNI Mobile & SMS Banking	99
26		BNI CorpU TV Knowledge Supplement: Leaders Talk Series "Agile & Digital Mindset Experience - Transforming Market & Fostering Collaboration"	120
27	January 31, 2024	BNI CorpU TV Knowledge Supplement: BNI Xpora Series Webinar "Let's Find Out How MSME Products Can Nail the Class & Go Global with BNI Xpora"	144
28		Implementing CSR Programs, BNI and the DKI Jakarta Provincial Government Inaugurate Swadharma Shop for Tata PKL	250
29			114
30	February 1, 2024	Inauguration of the Dharma Wanita Persatuan Office in the Ministry of SOEs Building Area	98
31		Boosting the Local Product Market, BNI Provides Vending Machines for Fostered MSMEs	91
32	February 2, 2024	Indonesia Incorporated Day: BNI is Committed to Continuing to Encourage Potential Diaspora	45
33	February 5, 2024	With the Spirit of Joy To The World Balikpapan Branch Celebrates Christmas	88
34	February 7, 2024	Grassroot Football Day Bhayangkara Presisi with BNI	57
35		Creating Digital Transaction Solutions, BNI Wins Alpha Southeast Asia Best Awards 2023	82
36	February 9, 2024	Creating Digital Transaction Solutions, BNI Wins Alpha Southeast Asia Best Awards 2023	86
37		Improving Teacher Competence, BNI Shares Teacher Certification	77
38		Happy National Press Day 2024	98
39	February 11, 2024	Radja Nainggolan Enjoys Investment & Travel Convenience Through BNI Emerald	91
40	February 13, 2024	3 Years of BNI Transformation Produce Solid and Quality ROE	45
41	February 15, 2024	BNIdirect Webinar: Selling With Confidence: Unraveling the Secrets of BNIdirect	88
42	February 19, 2024	Appreciating Loyal Customers, BNI Holds Chinese New Year Customer Gathering 2024	57
43	February 20, 2024	Creating a High-Achieving Young Generation, BNI Supports the BUMN Next-Gen 2024 Program	82
44		Realization of Collection & Distribution for the Period January to December 2023	86
45		BNI FOLK Campaign	90
46		Welcoming the 25th Anniversary of the BNI Workers Union, Holds Fun Football - Friendly Match with HIMBARA	67
47	February 21, 2024	BNI CorpU TV Knowledge Supplement: Bandung Institute of Technology Public Lecture "Becoming an Entrepreneur"	76
48		Carrying the Green Building Concept, BNI Builds an Office Building in the PIK 2 Area	46

No.	Date	Headline	Number of Accesses/ Downloads
49	February 22, 2024	ITB Studium Generale, BNI President Director Encourages the Young Generation to Become Entrepreneurs	77
50	February 24, 2024	Financial Planning Education for Hongkong's Diaspora	89
51	February 25, 2024	Supporting Hong Kong Diaspora Business, BNI Funds Kampung Kita	80
52		BNI and Posind Collaborate in Distributing Non-Payroll Consumer Credit Facilities	76
53	February 26, 2024	Traveloka Travel Fair Event (26 Feb - 3 Mar 2024)	88
54		OTW Gledek tiket.com Promo (26 Feb - 6 Mar 2024	98
55		BNI CorpU TV Knowledge Supplement "Smart People, Choose Tapenas: The Right Strategy for Saving and Buying Insurance for the Future"	81
56		BNI Carrying the Green Building Concept, Builds an Office Building in the PIK 2 Area	59
57	February 27, 2024	BNI CorpU TV Knowledge Supplement: BNI Xpora Series Webinar "Letter of Credit: The Key to Successful Export Transactions"	90
58		BNI x INACRAFT 2024	67
59	February 28, 2024	BNI Presents Hometown Feel for Indonesian Diaspora in Hong Kong	76
60		Supporting Inacraft 2024, BNI Encourages MSMEs to Go Global	46
61		Happy Galungan Day 2024	77
62	February 29, 2024	Wholesale Division Channel Newsletter Vol. 1	89
63		BNI Wins Three ESG Awards	114
64	March 2, 2024	BNI Group Synergy Realizes the Spirit of MSMEs From Zero and Hero	98
65	March 4, 2024	Distributing 50% Dividends, BNI is Optimistic that Performance Will Be More Positive in 2024	91
66	March 5, 2024	Appreciation of Performance Achievements in 2023	45
67		Buy 1 Get 2 Promo BNI JJF 2024	88
68	March 6, 2024	BNI CorpU TV Knowledge Supplement: Leaders Talk Series: Fostering a Global Mindset Toward Future Business Ecosystem	57
69		BNI Exporters Forum Supports MSMEs to Penetrate the Global Market	82
70	March 7, 2024	BNI CorpU TV Knowledge Supplement: Launching the National Transaction Champion Program 2024	86
71		BNI Strengthens Commitment to Increasing Financial Literacy and Inclusion through Various Programs	77
72		Supporting MSME Growth, BNI Fostered MSMEs Present at Dhawafest 2024	98
73	March 8, 2024	BNI Wins Two Corporate Communication Awards at BCOMSS 2024	91
74	March 11, 2024	Welcoming Ramadan, BNI Prepares Various Interesting Promos for Customers	45
75		Happy Nyepi Day 2024	88
76	March 13, 2024	Inaugurated by Erick Thohir, BNI Provides KUR and CSR to MSMEs in the Lambuang Bukittinggi Station Area	57
77	March 14, 2024	Shopping Anything Becomes Easier With 0% Installments on BNI Credit Cards	82
78		BNI CorpU TV Knowledge Supplement: Global Mindset Series 1 "Introduction to Global Culture and Its Impact on Business	86
79	March 15, 2024	BNI Movie Day 2024: A Moment of Togetherness for Loyal Merchants	90
80	March 17, 2024	Three Indonesian Representatives Reach the Finals of All England 2024, BNI Supports the Struggle of Athletes to Make History	67
81	March 18, 2024	BNI and the Indonesian Embassy in Seoul Socialize Financial Solutions for the Indonesian Diaspora in South Korea	76
82		SR020 Investment in BNI Mobile Banking	46
83		BNI x UNIQLO Ramadan Campaign 2024	77
84	March 21, 2024	Ramadan Spiritual Lecture "Ramadan Strengthens Social Harmony"	114
85	March 25, 2024	Ramadan's Excitement, BNI and UNAIR Collaborate to Distribute 1,000 Food Packages	98
86		BNI and ITS Surabaya Collaborate to Intensify the BNI Campus Financial Ecosystem Program	91
87		K-Store Challenge Program 2024	45
88		Ramadan Safari 2024, BNI Shares 78,000 Food Packages and Assistance	88
89		Supporting Green Financing, BNI Funds Medco Group's Solar Power Plant Project	57

No.	Date	Headline	Number of Accesses/ Downloads
90	March 26, 2024	BNI CorpUTV Knowledge Supplement: Anti Fraud Awareness "Social Engineering Definition, Types and Prevention Methods"	82
91		BUMN Ramadan Safari 2024 Held, Providing Cheap Basic Necessities to Free Homecoming	86
92		Encouraging the Development of Startups and Digital Ecosystems, BNI Ventures Injects Funds into Rukita	77
93	March 27, 2024	BNI CorpUTV Knowledge Supplement: Digital Trend and Series #1 "Ready For The Future Digital AI for Business Growth"	98
94		Realizing Collaboration, SP BNI Celebrates 25th Anniversary and Holds Inauguration of Roemah Aspirasi	91
95	March 30, 2024	BNI CorpUTV Knowledge Supplement: Ramadan Spiritual Lecture "Heart Aches, Knock on the Door of Heaven"	45
96	March 31, 2024	Wonderful Ramadan, BNI Shares Happiness on the Night of Nuzulul Quran	88
97		Maximize Credit Absorption, BNI Continues to Serve KUR and BWU during Easter Holidays	57
98		BNI CorpUTV Knowledge Supplement: Ramadan Spiritual Lecture "Harmony and Tolerance in the Holy Month"	91
99	April 1, 2024	Watch "Money Talks Power Lunch" Success Story of Global Bond Issuance & BNI Transformation to Face Challenges in 2024	45
100	April 2, 2024	BNI Wins 18 Awards at the 13th Infobank-Isentia Digital Brand Recognition 2024	88
101	April 4, 2024	BNI Global Bond Oversubscribed 6.4 Times, Proof of Investor Trust	57
102		Fun Homecoming with BUMN, BNI Sends 4,200 Travelers Home	82
103		Commitment to Implementing Good Corporate Governance	86
104		BNI Xpora Brings Indonesian Coffee MSMEs to the 2024 Amsterdam Coffee Festival	90
105	April 6, 2024	Sharing Kindness in the Blessed Month, BNI Holds Employee Volunteering to Clean and Help Mosque Infrastructure	67
106	April 7, 2024	Worry-Free Eid Homecoming with BNI Cash Withdrawal Services	76
107		BNI Ensures Services Ready to Welcome Eid al-Fitr 2024	46
108		Welcome Wonderful Lebaran, This is BNI's Promo	77
109		BNI Shares Happiness in the Month of Ramadan Starting from Providing Basic Necessities, Assistance, to Free Homecoming	89
110	April 10, 2024	Happy Eid al-Fitr 1445 H	80
111		Make it Easier to Share THR, BNI Mobile Banking Presents the DiKado Feature	76
112	April 14, 2024	BNI Helps Specialty Coffee, a Product of Xpora's Fostered MSMEs, Penetrate the American Market	88
113	April 15, 2024	BNI Shares Tips for Safe Digital Transactions at Tourist Attractions During the Eid Holidays	98
114	April 17, 2024	BNI CorpUTV Knowledge Supplement: Digital Trend and Skill Series #2 "Building Digital Bridges Integrating Technology in Modern Services"	81
115	April 18, 2024	BNI Supports MSMEs to Penetrate the Singapore Market at the Indonesia in SG Exhibition	59
116	April 20, 2024	Indonesia Wins All England and BAC, BNI Appreciates and Supports the Thomas & Uber Cup Teams	90
117	April 21, 2024	WDC March Wrapped Newsletter-Vol 3 Issue April 2024	91
118	April 22, 2024	Commemorating Kartini Day with Indonesian Female Badminton Athletes	45
119		BNI CorpUTV Knowledge Supplement: Global Mindset Series #2 Building Collaborative Teams and Customer/Client Relationships	88
120	April 23, 2024	BNI CorpUTV Knowledge Supplement: Global Mindset Series #2 Building Collaborative Teams and Customer/Client Relationships	57
121		Appreciation for All England & BAC Champions	82
122	April 24, 2024	BNI and Telkomsel Strengthen Synergy Through Reciprocal Cooperation for Employees	86
123	April 25, 2024	BNI and UNDIP Synergize, Strengthen Campus Financial Ecosystem	90
124		Realization of Collection & Distribution for the Period January to March 2024	67
125	April 26, 2024	Support Indonesian Team to Compete in Thomas and Uber Cup 2024	76
126	April 28, 2024	Good Luck in Thomas & Uber Cup 2024	46

No.	Date	Headline	Number of Accesses/ Downloads
127	April 29, 2024	BNI CorpUTv Knowledge Supplement: Global Expansion "Effective Delivery Strategy for MSMEs"	77
128		Investment for a Prosperous Future with ST012	89
129		Printing Credit Growth Amidst Global Dynamics, MSME and Consumer Segments Become BNI's New Growth Engines	80
130	May 1, 2024	Supporting Green Energy Transition, BNI Funds Sidrap PLTB Acquisition by Barito Group	76
131		Happy Labor Day 2024	88
132	May 2, 2024	Happy National Education Day	98
133		BNI Provides Financing Solutions for Business Actors through Supply Chain Financing	81
134	May 4, 2024	BNI Fully Supports Aldila in Achieving Her Dream of Becoming a Grand Slam Champion	59
135		Congratulations Indonesia, Thomas and Uber Goes to the Final	90
136	May 5, 2024	Synergy between BNI and UNUD, Providing Multifunction Student Cards DENPASAR - PT Bank Negara Indonesia (Persero) Tb	88
137	May 6, 2024	BNI Java Jazz on The Move Special Edition is Back! Natasya Elvira to Fariz RM and Candra Darusman Ready to Enliven the Event	57
138	May 7, 2024	Thank You Uber Team for Their Struggle to Achieve Runner Up	82
139	May 13, 2024	BNI CorpUTV Knowledge Supplement: Mastering Territorial Management in Retail Business "Strategic and Insights From Industry Experts'"	86
140	May 14, 2024	BNI Welcomes Thomas and Uber Indonesia Teams Home to Indonesia	90
141	May 18, 2024	BNI Strengthens Synergy with the Indonesian Army Through the Provision of Banking Services	67
142	May 19, 2024	Consistently Supporting SMMPTN-Barat 2024, BNI Collaborates with 25 PTN	76
143	May 20, 2024	BNI Amsterdam Further Optimizes BNI Business in Europe	46
144	May 21, 2024	BNI Wins Two Marketeers Youth Choice Awards 2024	77
145	May 22, 2024	Webinar series UU PDP - Data Privacy and Data Protection Awareness	89
146		WDC Newsletter April Wrap up - Vol 4 Issue May	80
147		Supporting Startup Development, BNI Ventures Injects Funds into Fishlog	76
148	May 23, 2024	Held in Bali, BNI Fully Supports the World Water Forum 2024	88
149		Anti-Fraud Awareness Webinar - Avoid Online Gambling and Illegal Online Loans	98
150		BNI Strengthens Synergy with the IKN Authority, Provides Integrated Banking Services	81
151	May 24, 2024	BNI Supports BUMN Bakti Volunteers to Samboja and IKN, Rehabilitate Orangutans and Mangroves	59
152		Music Experiences, BNI Java Jazz Festival 2024 Held for 3 Days in Kemayoran	88
153		BNI Spreads Interesting Promos at BNI Java Jazz Festival 2024	57
154		BNI Java Jazz Festival 2024 Will Be Held Soon, Note the Best Route to the Location	82
155	May 25, 2024	Here's the Line Up for BNI Java Jazz Festival 2024, Which is Your Favorite?	86
156		Plastic Waste Can Be a Prize? Come on, Exchange it at the BNI Java Jazz Festival 2024 Recycle Vending Machine! BNI Java Jazz Festival 2024, More Than Just Music, Experience the Wondrful Experience	90
157		BNI Mobile Banking Users Are Spoiled with Various Interesting Promos at the BNI Java Jazz Festival 2024	67
158		BNI Java Jazz Festival 2024, A Stage Full of Stars on the Second Day	76
159	May 26, 2024	Wondrful Day 1 BNI Java Jazz Festival 2024	46
160		BNI Agen46 Present at the Wondrous Booth BNI Java Jazz Festival 2024, Join the Excitement of the Games	77
161		Erwin Gutawa, Ruth Sahanaya, and Incognito Amaze the Audience on the First Day of the BNI Java Jazz Festival 2024	89

No.	Date	Headline	Number of Accesses/ Downloads
162	May 27, 2024	Snoh Aalegra, Tompi, and Andien Enliven the Peak of the BNI Java Jazz Festival 2024	80
163		Wondrful Day 2 BNI Java Jazz Festival 2024	76
164		Supporting Startup Development, BNI Ventures Injects Funds into Fishlog	88
165	May 28, 2024	Uniting Across Generations, Ministry of SOEs Appreciates BNI JJF 2024	98
166		BNI and UNY Establish Synergy to Strengthen Campus Financial Ecosystem	81
167		Digitalization Era: Disruption or Opportunity for Transformation?	59
168	May 29, 2024	BNI CorpUTv Knowledge Supplement: BNI Xpora Series Webinar "Stepping into the International Market with Xpora	88
169		Positive Performance in Q1 2024, BNI Finance is Optimistic That Growth Will Continue Until the End of the Year	57
170		BNI CorpUTV Knowledge Supplement: Agen46 Sales Model and Increasing the Capability of Agen46 Sales (AGS)	82
171	May 31, 2024	BNI Java Jazz Festival 2024 Momentum to Drive BNI Digital Transactions	86
172		BNI Holds BNI Exporters Forum in Bandung, Encourages SMEs to Penetrate the Global Market	90
173	June 3, 2024	BNI Invites Emerald Customers to Get to Know Environmentally Friendly Vehicles Closer	67
174	June 4, 2024	Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards	76
175	June 5, 2024	BNI Finance Director Wins "The Most Inspiring Woman Leader" Award from CNBC Indonesia	46
176		Power Lunch Money Talks: Opening Up Expansion Challenges in the Era of High Interest Rates	77
177	June 6, 2024	Let's Use BNI's 78th Anniversary Logo	89
178	June 7, 2024	BNI Becomes a Catalyst for UMKM Through Collaboration with Pupuk Indonesia Holding Company	80
179	June 8, 2024	BNI is Ready to Spread Attractive Promos at the Jakarta Great Sale Festival 2024	76
180	June 9, 2024	BNI and Emirates Hold Travel Fair for the Third Time, Offering Special Tickets and Promos	88
181	June 10, 2024	Implementing Social Responsibility, BNI Delivers Batch V BUMN Bakti Volunteers to Samboja and IKN	98
182	June 11, 2024	Implementing Social Responsibility, BNI Delivers Batch V BUMN Bakti Volunteers to Samboja and IKN	81
183		RACE Talk Series: Creating Impactful Innovation through Culture Transformation	59
184	June 12, 2024	BNI Xpora Sends 12 Food and Beverage SMEs to Indonesia in Korea - SFH 2024	67
185		BNI Awards Performance Excellence Award (PEXA) 2024	76
186	June 13, 2024	Governance, Risk & Compliance (GRC) Series #1: "Risk Mitigation through Cyber Security Strategy"	46
187	June 14, 2024	Agen46 Webinar Series 2: Strong Features, Increased Profits	77
188		BNI and Mastercard Introduce BNI Titanium Credit Card for Millennials and Gen Z	89
189	June 15, 2024	BNI Opens Limited Services on Eid al-Adha 1445 H	80
190	June 18, 2024	Strengthening Financial Literacy and Inclusion, BNI Educates the Community on Waste Management	76
191	June 20, 2024	78th Anniversary, BNI Holds Empathy Drop Box Program Again	88
192		BNI CorpUTV Supplement: Healthy Talk Series "Early Detection of Pinched Nerve Risk and Handling with Termini Technology"	98
193	June 21, 2024	BNI CorpUTV Knowledge Supplement: FIT Series Podcast "Frontline Revolution & Inspiring Talk (FIT) - Session 1 Area Head	81
194	June 24, 2024	BNI CorpUTV Knowledge Supplement: The Challenges in Trade Finance and FI Business Landscape	59
195	June 25, 2024	BNI CorpUTV Knowledge Supplement: The Challenges in Trade Finance and FI Business Landscape	88
196	June 26, 2024	BNI x Mommy & Me 2024	57
197	June 27, 2024	BNI CorpUTV Knowledge Supplement: Podcast Series "Frontline Revolution & Inspiring Talk (FIT) Session 1-2 Area Head	82
198		BNI Business Innovation Award (Binnova) Is Back	86

No.	Date	Headline	Number of Accesses/ Downloads
199	June 28, 2024	BNI CorpU TV Knowledge Supplement : Feedback in Digital Era "strategies for Growth & Success in a Tech Driven World"	90
200		BNI CorpU TV Knowledge Supplement: Podcast Fit Series "FronlineRevolution & Inspiring Talk (FIT) Session 1-3 Area Head	67
201	June 29, 2024	BNI CorpU TV Knowledge Supplement: BNI Xpora Series Webinar "Potential for Indonesian SME Exports to the Land of Windmills, the Netherlands with Xpora"	76
202		"Wisely Manage Finances and Investments Through Financial Education and Public Information Disclosure"	46
203	June 30, 2024	BNI Launches Special TapCash Card for Blackpink the Game to Celebrate 78th Anniversary	77
204		BNI Accelerates Diaspora-Owned Businesses in Japan	89
205		Holding Financial Education and Information Disclosure, BNI Introduces DigiRemit Application in Japan	80
206	July 2, 2024	BNI CorpU TV Knowledge Supplement: Business Ethic Series #1: "Ensuring Compliance: Social Media in Regulated Industries"	76
207		BNI Collaborates with Cloudera to Accelerate Transformation through Generative AI Implementation	88
208		BNI Presents Massive Promos and Discounts for 78th Anniversary	98
209		Wondrful Celebration for 78th BNI	81
210	July 3, 2024	BEE BNI Employee Excellence Award	59
211	July 4, 2024	Providing the Best Service, BNI Wins 13 Infobank Banking Service Excellence Awards 2024	88
212		Celebration of the 78th Anniversary of PT Bank Negara Indonesia (Persero) Tbk	57
213	July 5, 2024	Launching & Presscon wondr by BNI	82
214	July 6, 2024	BNI Launches wondr by BNI, Supports Indonesian People to Realize Financial Dreams	86
215	July 8, 2024	78th Anniversary, BNI Holds wondrPARADE to Enliven CFD Jakarta	90
216		78th Anniversary, BNI Holds wondrPARADE to Enliven CFD Jakarta	98
217	July 10, 2024	BNI Inaugurates Integrated Service Unit at ITB, Strengthens Campus Financial Ecosystem	81
218	July 12, 2024	BNI CorpU Tv Knowledge Supplement: BNI x SIG Webinar	59
219	July 15, 2024	BNI Ventures Launches BNV Arcade to Strengthen Startup Ecosystem	67
220	July 16, 2024	BNI CorpU TV Knowledge Supplement: Governance, Risk & Compliance (GRC) Series #2	76
221	July 17, 2024	BNI CorpU TV Knowledge Supplement: Empowering Wholesale Transaction "Mastering Program Jawara Transaksi & BNIdirect On Boarding Process"	46
222	July 19, 2024	BNI CorpU TV Knowledge Supplement: Loans Are Getting Easier and More Profitable with BNI Agen 46	77
223		BNI Xpora Wins SME Enabler of the Year 2024 Award from Marketeers Magazine	89
224		BNI's 78th Anniversary Presents BNI Expo 2024	80
225		BNI Celebrates 78th Anniversary by Launching wondr by BNI and Holding BNI Expo 2024	76
226	July 22, 2024	BNI Reappointed as RDN Administrator and Payment Bank	88
227		Xpora Series Webinar 2024: "Opportunities & Challenges for Exporting Indonesian SME Commodities to East Asian Countries with the Indonesian Ministry of Foreign Affairs & Xpora	98
228	July 23, 2024	Developing the Campus Financial Ecosystem, BNI and Telkom University Collaborate to Create Integrated Payments	81
229		BNI CorpU TV Knowledge Supplement: Forming an Export-Oriented Coffee Ecosystem	59
230	July 24, 2024	BNI and DJP Hold "Spectaxcular 2024" Tax Campaign, Calling for Strong Taxes, Healthy APBN	88
231		Indonesian Migrant Workers Earn Bachelor's Degrees, BNI Hong Kong Gives Appreciation	57

No.	Date	Headline	Number of Accesses/ Downloads
232	July 25, 2024	Kapolri Cup 2024 by BNI Celebrates the 78th Anniversary of Bhayangkara	82
233		Pamper Generation Z and Millennial Customers, BNI Holds Emerald Private Golf Clinic Gen 2.0	86
234		BNI CorpU TV Knowledge Supplement: BNI MMSGI Loyalty Payroll	90
235		BNI Finance Records Financing of IDR 2.89 Trillion in Semester I-2024, Soaring 216%	67
236	July 26, 2024	Closing Semester I Well, BNI Finance Appoints New Commissioner at the AGM	98
237		Handover of Position, Congratulations to the New Srikandi BNI Chairperson	81
238		BNI and Indosat Establish Cooperation, Provide Financial Services and Information Technology	59
239	July 30, 2024	Visit BNI EXPO 2024, Find Out How to Own a House, Vehicle and Dream Picnic Easily and Attractively	67
240	July 31, 2024	BNI Ciputra Golfpreneur Tournament 2024, Encourage Indonesian Golf Athletes to World Level	76
241	August 1, 2024	Kapolri Cup 2024 Successfully Held, BNI Appreciates Polri	46
242		Realization of Collection & Distribution for the Period January to June 2024	77
243	August 2, 2024	Opening Today in BSD, BNI Expo 2024 Offers Interesting Promos and Enjoy Wondrful Journey	89
244	August 3, 2024	BNI Launches Co-Branding Credit Card with MAPCLUB	80
245		BNI Securities Ready to Pamper Customers with Exclusive Promotions at BNI Expo 2024	76
246		BNI Expo 2024 Becomes an Event for Business Matching between MSMEs and International Buyers	88
247	August 4, 2024	Enlivening BNI Expo 2024, BNI Asset Management Invites the Public to Learn to Manage Finances	98
248	August 6, 2024	Enlivening BNI's 78th Anniversary, Thousands of Runners Join BNI Miles Tune 5K	81
249	August 7, 2024	BNI Expo 2024 Successfully Held, Tens of Thousands of Visitors Enjoy Wondrful Journey	59
250		BNI CorpU TV Knowledge Supplement: Business Ethic Series #2 "Strengthening Organizations Through Prevention and Management of Conflicts of Interest"	88
251	August 8, 2024	BNI CorpU TV Knowledge Supplement: BNI Xpora Series Webinar "Potential for Indonesian SME Exports to Neighboring Countries, Malaysia with Kuala Lumpur Trade Atdag & Xpora"	57
252		Penetrating the American Market, BNI Xpora Brings Fostered SMEs to the 2024 Shoppe Object NYC Exhibition	82
253	August 9, 2024	The Existence of BNI Agen46 in the Digital Era	86
254		Support Your Dream Future with BNI	90
255		Mandatory webinar for BSM, SBM, Frontliners, PUT Supervisors and Money Management in Regions/Branches	67
256	August 13, 2024	President Jokowi Visits BNI Digital Banking Cafe, Access to Banking Services is Easier and More Convenient in IKN	89
257	August 14, 2024	Realizing an Anti-Corruption Culture through Instilling Integrity Values	80
258		BNI Holds Compliance Forum with KPK, Enhances Anti-Corruption Culture	76
259		Refreshment New Sales Model Revolution Strategy Performance Excellence (RETRACE)	88
260	August 17, 2024	Go Global, BNI Xpora Sends 5 SMEs to HKTDC Food Expo 2024 in Hong Kong	98
261		BNI-UI Half Marathon 2024 Returns Held, Join the Fun and Get Interesting Promos	81
262		President Jokowi Visits BNI Digital Banking Cafe, Access to Banking Services is Easier and More Convenient in IKN	59
263	August 18, 2024	BNI Xpora Holds BNI Exporters Forum in Makassar, Encourages SMEs to Go Global	88
264		BNI and OJK Educate IKN Construction Workers about the Dangers of Online Gambling	57
265		BNI and Mercubuana University Collaborate to Improve Campus Financial Ecosystem	82
266	August 19, 2024	BNI CorpU TV Knowledge Supplement: BNI PKB Signing Ceremony for 2024	86
267	August 20, 2024	Shopping for Anything is Easier with 0% Installments on BNI Credit Cards	90

No.	Date	Headline	Number of Accesses/ Downloads
268	August 21, 2024	BNI Ciputra Golfpreneur Tournament 2024 Returns, Featuring Asian Professional Golfers	67
269		BNI CorpU TV Knowledge Supplement: Digital Trend and Skill Series #4	80
270		BNI Supports Diaspora through Leading Programs Through Overseas Office Networks	76
271	August 22, 2024	Business Growth Acceleration Drives BNI's Performance in Semester I 2024	88
272	August 25, 2024	BNI and Ciputra Collaborate in Golfpreneur Tournament 2024, Encouraging Indonesian Golfers to the World Stage	98
273		BNI Supports Bluebird's Digital Business Transformation, Creating Future Mobility	81
274	August 26, 2024	BNI Bazaar Fest Vol 3	59
275	August 27, 2024	Facilitate Diaspora, BNI and Ministry of Foreign Affairs Collaborate on Indonesian Community Cards Abroad	88
276	August 29, 2024	Bazaar Fest Vol. 3 Held for 3 Days, Filled with Promos wondr by BNI	57
277		BNI CorpU TV Knowledge Supplement: Mastering Security Level Literacy in Transactions	82
278		Watch BNI's 2024 Public Expose Live	86
279		Establish Cooperation, BNI Provides Banking Products and Services for Bappenas	90
280	August 30, 2024	Newsletter WDC July Wrap up - Vol 7 Issue August	67
281	September 2, 2024	Congratulations on the Men's Doubles Champion at the 2024 Korea Open	88
282		Making Transactions More Exciting, the Use of wondr by BNI Increases by 200%	98
283	September 3, 2024	BNI Successfully Holds Bazaar Fest Vol.3, wondr by BNI Facilitates Visitor Transactions	81
284		Order SR021, Safe Investment, Source of Passive Income	59
285	September 4, 2024	Enliven National Customer Day "wondrful Customers, Make Your Wishes Happen"	88
286	September 5, 2024	There is BNI's Support Behind the Indonesia Africa Forum (IAF), Optimizing Global Business Cooperation	57
287	September 6, 2024	BNI Introduces the New Look New Image Concept on National Customer Day 2024	82
288	September 9, 2024	BNI Inaugurates a Representative Office in Sydney, Becoming the First Indonesian Bank in Australia	86
289	September 11, 2024	Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards	90
290	September 13, 2024	BNI Enters the List of 100 Largest Companies in Indonesia according to Fortune Indonesia	67
291	September 15, 2024	Followed by 10,000 Runners, BNI UI Half Marathon 2024 Successfully Held	89
292		BNI CorpU TV Knowledge Supplement: BNI Supports Gernas BBI/BBWI North Maluku to Go Global	80
293	September 17, 2024	BNI and IKA Trisakti Collaboration, Expanding the Campus Financial Ecosystem Program	76
294	September 18, 2024	BNI Enters the List of 1,000 Best Companies in the World 2024, According to TIME and Statista	88
295	September 19, 2024	BNI Ventures Bridges Startups and Banking Through the Match Arc Program	98
296		BNI is Proud of the Achievements of Indonesian Badminton Athletes	81
297		Go Viral wondr, BNI and BI Enliven FentuRun 10k in Balikpapan	59
298		BNI Indonesian Masters 2024 Ready to be Held, Presenting Global Spirit	88
299		BNI CorpU Tv Knowledge Supplement: Maximizing the Ecosystem "Exploring BNI Business Opportunities in the Health, Education and Area Management Sectors"	57
300	September 20, 2024	Implementing Transparent Sustainability Reports, BNI Wins the 2024 Republika ESG Award	82
301		BNI CorpU TV Knowledge Supplement: The Right Way to Execute BNI Agen46 Sales!	86
302		Maximize Beauty with BNI	90
303		SATURDAYS Discount Promo	67
304		PDP Series 3 Socialization: "Data Privacy Awareness and Data Protection	80

No.	Date	Headline	Number of Accesses/ Downloads
305	September 22, 2024	BNI and Bloomberg Collaborate, Facilitate BPD Foreign Exchange Transactions Through the FXGO Platform	76
306	September 23, 2024	BNI and AOP Collaborate, Indonesia Will Become the First Global Pop Idol Center in Southeast Asia	67
307		PDP Series 3 Socialization Webinar - Data Privacy Awareness and Data Protection	89
308		BNI Named as the Most Trusted Bank in the World Most Trustworthy Companies 2024 by Newsweek and Statista for the Bank Category	80
309		Supporting the Green Transition in the Energy Sector, BNI Holds BEST Event	76
310	September 25, 2024	BNI Increases Financial Literacy in Surabaya through Seminars for MSMEs and BNI Agen46	88
311	September 26, 2024	BNI CorpU TV Knowledge Supplement: Knowledge Supplement Webinar - Sharia Pension Fund: Achieving Blessed Welfare in Old Age	98
312	September 27, 2024	BNI CorpU TV Knowledge Supplement: Building a Culture of Integrity in the Workplace	81
313	September 29, 2024	BNI Records 27% Asset Growth in 5 Years, Supported by Digital Transformation and Expansion Strategic	59
314		BNI CorpU TV Knowledge Supplement: Global Mindset Webinar #5 - Advanced Risk Management in Global Finance	88
315	September 30, 2024	BNI Brings Indonesian Badminton Athletes to Make History on the Global Stage	57
316		BNI Investor Daily Summit 2024: Accelerating Indonesia's Economic Growth in the Transition Period	82
317	October 1, 2024	BNI CorpU TV Knowledge Supplement: "SkillUp Program Socialization! (Learn Soft Skills and Hard Skills) & BUMN Learning Festival Program"	86
318	October 2, 2024	"Money Talks Power Lunch" Digitalization is Getting Faster, BNI is Optimistic that Business Will Continue to Grow Positively	90
319		Returning to Indonesia LPS Travel Fair 2024	67
320	October 3, 2024	Support Inacraft on October Vol.3, BNI Encourages Young Generation to Become Entrepreneurs	80
321		Race Talks Series: "Future Generation of Credit Retail Experience"	76
322		Increase Accessibility of International Services, BNI Relocates KLN Singapore to Strategic Location at Raffles Place	67
323	October 4, 2024	BNI Spreads Attractive Promos at #DiIndonesiaAja LPS Travel Fair 2024	89
324	October 5, 2024	Happy Kuningan Day	80
325	October 7, 2024	BNI Singapore's Milestone "Inspiring Tracks of Achievement and Growth	76
326		Time to Invest for Mutual Prosperity	88
327	October 8, 2024	BNI Investor Daily Summit 2024: Optimism Amidst Various Global Challenges	98
328	October 9, 2024	BNI Expands Business in Tourism and Health Sectors, Encourages Economic Growth	81
329		Supporting Customer Business Growth, BNIdirect Presents Latest Features	59
330		BNI Investor Daily Summit 2024 BNI and Prabowo's Emotional Memories: A Family Legacy That Continues	88
331	October 10, 2024	SkillUp Program! Learn Foreign Languages "The Importance of Foreign Language Proficiency in Enhancing Global Careers"	57
332	October 11, 2024	Shopping for Anything Becomes Easier with 0.5% Installments on BNI Credit Cards	82
333		Investor Daily Summit 2024 Lo Kheng Hong Reveals 6 Ideal Criteria for Stocks Worth Buying, BNI on the List	86
334		Investor Daily Summit 2024 BNI Strengthens Smart City Services to Attract Investment in the Regions	90
335	October 13, 2024	BNI Investor Daily Summit 2024 BNI Director Shares Tips on Choosing Investments According to Risk Profile	67
336		25 Years of GarudaMiles BNI and Garuda Indonesia Offer Bonuses of up to 25,000 GarudaMiles for Garuda BNI Credit Card Holders	80
337	October 14, 2024	5,000 wondr 5K Participants Enliven the wondr Jakarta Running Festival 2024	76
338		BNI and BNI Partners Win a Series of Awards at the 2024 BUMN Champion Partner Event	67

No.	Date	Headline	Number of Accesses/ Downloads
339	October 16, 2024	Educating Trisakti Students, BNI Reminds of the Importance of Personal Data Protection	89
340		BNI and Bluebird Strengthen Payment Digitalization with QRIS across the Bluebird Fleet	80
341		BNI CorpUTV Knowledge Supplement: Potential for Indonesian SME Exports to the Land of the Kangaroos, Australia with Atdag Canberra & Xpora"	76
342	October 17, 2024	BNI and BPJS Kesehatan Expand Cooperation to Improve National Health Services	88
343		BNI Most Transparent Company According to CNBC's 2024 GCG Award with the Attorney General's Office	98
344	October 18, 2024	Easier, Company Guidelines Can Be Accessed Via Mobile Phones	81
345	October 20, 2024	BNI CorpUTV Knowledge Supplement: Accurate Execution of Managing BNI Agent 46	59
346	October 23, 2024	BNI CorpUTV Knowledge Supplement: Introducing the New Integrated Digital Platform BNIdirect	88
347		Click and Collect at Watsons ID Discount IDR 25K	57
348		Achieving 6th Rank of Largest Tax Paying SOEs in 2023, BNI is Optimistic to Continue Contribution to the Country	82
349	October 25, 2024	BNI Partners with KinderCastle to Open Daycare for Employees	86
350		Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards	90
351		Digitalization Boosts Operational Income, BNI Profit Reaches IDR 16.3 Trillion in Q3-2024	67
352	October 29, 2024	Encouraging Innovative Collaboration in the Financial Services Industry, BNI Ventures Brings 10 Axel Arc Startups to Tech in Asia Conference 2024	80
353	October 30, 2024	WDC Newsletter August & September Wrap up - Vol 8 Issue October	76
354		Exceeding Industry Average, BNI Mortgage Distribution Grows 13% in Q3-2024	67
355	October 31, 2024	Competing for a Total Prize of US$2 Million, World Elite Golfers Enliven BNI Indonesian Masters 2024	89
356		BNI Presents Digital Financial Solutions at Universitas Negeri Gorontalo	80
357		Realization of Collection & Distribution for the Period of January to September 2024	76
358		BNI Investor Daily Summit 2024: BNI Encourages Business Competitiveness with AI and Cloud-Based Digital Transformation	88
359	November 1, 2024	BOD-2 Leaders Development Mission: "Strategic People Leaders with Core Values AKHLAK"	98
360	November 2, 2024	Chairman of Commission XI Misbakhun Appreciates BNI's Digitalization and Performance	81
361		BNI Distributes Supply Chain Financing for Bumi Serpong Damai Partners	59
362	November 4, 2024	BNI CorpUTV Knowledge Supplement: Wellbeing Parenting Series: "The Importance of Routines in Children's Lives"	88
363	November 5, 2024	Transformation of Branch Office Services, BNI Inaugurates the First Super Flagship in Bandung	57
364		BNI Hi-Movers Compete in Innovation Creative at BINNOVA 2024	82
365	November 7, 2024	Present at Indonesia Week Hong Kong 2024, wondr by BNI Gets Closer to the Indonesian Diaspora in Hong Kong	86
366		Through the Digital Financial Ecosystem, BNI Supports the National Nutrition Agency to Distribute Free Nutritious Food	90
367	November 8, 2024	Increasing Digital Literacy, BNI Invites UKSW Salatiga Students to Become a Financially Smart Generation	67
368	November 9, 2024	BNI Digital Banking Cafe Present in Bali, Enjoy the Beauty of Mount Batur While Making Transactions	80
369	November 10, 2024	Reformasi Run on Heroes' Day, wondr by BNI Presents in Senayan	76
370	November 11, 2024	Supporting Unlimited Creativity, wondr by BNI Presents Pop Culture Performance at Indonesia Comic Con 2024	67
371		BNI CorpUTV Knowledge Supplement: "Indonesian SME Export Potential to the Land of the Blue Dragon, Vietnam with Hanoi Trade Attaché & Xpora"	89

No.	Date	Headline	Number of Accesses/ Downloads
372	November 12, 2024	Indonesian Consulate General Names BNI as the Best Bank Serving Diaspora in Hong Kong	80
373		Get Cash Rewards Up to 3.5 Million by Referring BNI MAPCLUB Credit Card	76
374		BNI Obtains USD 600 Million Loan Facility from 6 Foreign Banks	88
375		Shopping Anything is Easier with 0% Installments on BNI Credit Cards	98
376	November 13, 2024	CULTURE FEST 2024	81
377		Supporting Indonesia Fintech Summit 2024, BNI Encourages Digital Financial Literacy and Inclusion	59
378		BNI CorpU TV Knowledge Supplement: Next Gen BNI Ecosystem: Optimizing Business Potential Through Digital Ecosystem Solutions	88
379		BNI Culture Fest 2024, Transformation in Building Work Culture and Performance	57
380	November 14, 2024	BNI CorpU TV Knowledge Supplement: Stress Management to Increase Productivity - Stress-Free Tips & Tricks in the Workplace	82
381		BNI's Digitalization and Expansion Abroad Receive Praise from DPR Members	86
382	November 16, 2024	Supporting the World of Education, BNI Hands Over Teacher Training and Financial Literacy Certificates for Students	90
383	November 18, 2024	Wellbeing Series Talkshow 2024 - Workplace Mental Health: How Are You Really? with Naluri Coach	67
384	November 19, 2024	Complete the Dukuh Atas-Sudirman TOD Ecosystem, BNI Inaugurates Naming Rights "Stasiun Dukuh Atas BNI" LRT Jabodebek	80
385	November 20, 2024	BNI Optimizes Digital Services to Make it Easier for Manulife Customers to Pay Premiums	76
386	November 21, 2024	Learn the Potential of QIOS46 Business (BNI Agen46 and Toko Mandiri Indogrosir)"	76
387	November 22, 2024	Pocketed Gold Rank ASRRAT for 4 Consecutive Years, Proof of BNI's Commitment to Implementing Sustainable Finance	67
388		Strengthening Commitment as Agent of Development, BNI Collaborates with Batumbu to Expand Financing Access for MSMEs	89
389		"Learning the Potential of QIOS46 Business (BNI Agen46 and Toko Mandiri Indogrosir)"	80
390	November 25, 2024	Consistently Improving the Quality of GCG Implementation, BNI Again Wins the Title of 'The Best Overall in Corporate Governance'	76
391	November 27, 2024	BNI Wins the Title of "The Most Trusted Companies" at the 2024 Corporate Governance Perception Index Award	88
392	November 28, 2024	Supporting the Success of the 2024 Simultaneous Regional Elections, BNI Closes All Branch Offices	98
393		Webinar Digital Trend and Skill Series #6: Cyber Security Insights and Strategies for Safer Tomorrow	81
394		Presenting a New Concept, BNI Emerald Center Pamper Premium Customers	59
395		Beginner Content Creator Class - Step by Step Introduction to Content Creation	88
396		BNI Gets Closer to Loyal Merchants Through "BNI Wonderful Movie Day 2024"	57
397	November 29, 2024	WDC Monthly Newsletter October Wrapped Up	82
398		BNI Mastercard World Comes with New Design and Features, Healthier Life, More Exciting Traveling	86
399	November 29, 2024	E-Book “Transform or Disappear” – Provisions for Hi-Movers Towards the Future!	90
400		Make Your Wishes Come True with wondr by BNI	72
401		Becoming a Debtor's Strategic Partner, BNI Affirms Commitment to Encourage Green Transition at COP29 Azerbaijan	65
402		Winning Best Employer Brand on LinkedIn Talent Awards Indonesia 2024, BNI Leads the Future of Work	34
403	December 2, 2024	World Badminton Stars and Sheila on 7 Enliven wondr byB NI BrightUp Cup 2024	56
404		Royke Tumilaar CEO of The Year 2024, Becomes an Influential Figure in the Indonesian Banking Industry	88
405		Shopping for Anything Becomes Easier with 0% Installments on BNI Credit Cards	98
406	December 5, 2024	BNI Ventures Partners with IPB to Develop Startup Ecosystem	81

No.	Date	Headline	Number of Accesses/ Downloads
407	December 6, 2024	Present in Borobudur, BNI Promotes Nusantara Culture Through Plataran Xtravaganza	59
408		BNI and Bumi Siak Pusako Collaborate to Provide Employee Retirement Solutions	88
409		BNI Blocks 4,249 Accounts Indicated as Online Gambling	57
410		Recognized as a Global Bank, BNI Wins 2 Prestigious International Awards from Corporate Treasurer	82
411	December 9, 2024	Supporting Financial Inclusion, BNI Participates in Celebrating International Disability Day 2024	86
412	December 10, 2024	BNI Becomes Main Partner for Upper-Class Customers to Manage Wealth	90
413		Through Diaspora Loan, BNI Helps Indonesian Diaspora in Hong Kong Upgrade	72
414	December 12, 2024	Becoming the Best Bank in the Rupiah Money Market to Inclusive Financing, BNI Wins 5 Awards from Bank Indonesia	65
415		BNI's Efforts to Support the Government in Achieving Net Zero Emissions 2060	34
416		Supporting Sugar Self-Sufficiency 2028, BNI and Sugar Synergy Nusantara Cooperates to Distribute KUR to Sugarcane Farmers	56
417	December 13, 2024	Commitment to Implement Good Corporate Governance	54
418	December 16, 2024	Innovative in Campus Services, BNI Wins Diktisaintek Award	67
419	December 17, 2024	BNI Supports Healthy Lifestyle Through Employees' Cycling Culture	71
420		Retirement is Not the End of Productivity, but the Beginning of New Opportunities	40
421	December 18, 2024	BNI Moves Quickly to Distribute Aid to Sukabumi Disaster Victims	45
422	December 19, 2024	Webinar "Education Equal to Work: People with Disabilities Become BNI Agen46"	59
423	December 20, 2024	Increase Coffee Farmer Productivity, BNI Equatorial Coffee Exploration Present in Temanggung	88
424	December 20, 2024	Supporting the Work of the Disabled, BNI Head Office Displays Paintings by 7 Young Visual Artists	57
425	December 21, 2024	Consistently Implementing Information Transparency, BNI Wins Informative BUMN from the Central Information Commission	82
426	December 21, 2024	BNI Provides Explanation Regarding Sritex's Bankruptcy Status	86
427	December 23, 2024	New BNI-MyPertamina Credit Card Product, Buy Fuel and Get Cashback	90
428	December 23, 2024	Supporting MSMEs Go Global, BNI Partners with PT Pos to Strengthen Logistics and Financing Ecosystem	72
429	December 23, 2024	BNI Prepares IDR19.74 T in Cash to Ensure Comfortable and Safe Transactions during Christmas and New Year	65
430	December 23, 2024	Journey to Wondrous Hope - Realizing a Bright Future Together	34
431	December 27, 2024	BNI and Bumi Siak Pusako Collaborate to Provide Employee Retirement Solutions	56
432	December 27, 2024	Royke Tumilaar Creates Innovation Hub in Sarinah, Birthplace of wondr by BNI	54
433	December 27, 2024	Digital Transformation, DPLK BNI Presents New Website	67
434	December 27, 2024	"Early Warning Systems: Detecting and Preventing Liquidity Risks"	80
434	December 31, 2024	Closing 2024, wondr by BNI Users Get Ready to Receive Financial Transaction Reports from wondr Insight	89

PUBLIC INFORMATION DISCLOSURE

As part of its commitment to public information transparency, BNI continuously strives to simplify public access to relevant and transparent information. BNI leverages various digital platforms to provide information quickly and effectively, including raising public awareness through the website, developing standard operating procedures (SOPs), and integrating digital service features. In addition, updates to offline services are also made to complement this accessibility.

Furthermore, BNI actively contributes to improving financial literacy and empowering Agen46 as a network for disseminating information that can reach a wide audience. This effort ensures that every segment of society, including customers, can obtain information efficiently.

In every communication, BNI prioritizes transparency and accountability. Through the role of the Information and Documentation Management Officer (PPID), BNI optimally serves the public's information needs, in line with the principles of Good Corporate Governance (GCG).

Governance Framework, Management, and Control of Tax Aspects

In carrying out business activities and banking operations in the midst of a highly regulated industry, BNI ensures that it carries out management and control of tax aspects as one of the main pillars to ensure sustainability and stakeholder trust. As a corporate taxpayer, BNI is committed to fulfilling its tax obligations in accordance with applicable regulations both in fulfilling Corporate Income Tax obligations and in carrying out its role as a tax withholding agent, and also ensuring that the submission of tax obligation documents, including annual and monthly SPTs, to regulatory institutions is carried out on time. Tax management at BNI is under the supervision of the Director of Finance, who periodically reviews the Bank's tax strategy.

In order to maintain the quality of implementing good tax governance, BNI has an adequate governance framework, starting from implementing clear tax policies and procedures and including guidelines regarding tax reporting, fulfilling tax obligations, and managing tax risks. In implementing the management of tax obligations and monitoring and controlling taxes, BNI has established a comprehensive and structured process, such as:

1. Instilling a tax approach in the Bank through Tax Company Guidelines and collaboration with tax application service providers for deposit and reporting systems that are directly connected to the tax authorities. BNI also increases tax awareness through training and socialization.
2. Identify, manage, and monitor tax risks by carrying out continuous monitoring and reconciliation.

In addition, BNI also implements an integrated tax Information Technology system to help manage financial information more efficiently. This system enables accurate tax recording and reporting, as well as ensuring the Bank's consistency and compliance with tax regulations and complying with applicable recording rules and regulations. By implementing a targeted approach and optimizing digitalization, the Bank can maintain the level of compliance with applicable laws and regulations so as to avoid administrative sanctions, such as fines, interest, and criminal sanctions due to underpayment.

In addition to referring to tax laws and regulations in Indonesia, BNI's fulfillment of tax obligations is also carried out in accordance with the tax jurisdiction in each overseas office network, such as New York (United States), London (England), Seoul (South Korea), Tokyo (Japan), Hong Kong, Australia, the Netherlands, and Singapore through the Foreign Office (KLN).

Further discussion regarding the fulfillment of BNI's tax obligations has been described in detail in the Bank Performance Analysis and Discussion Chapter, in the Taxation Sub-chapter: BNI's Contribution to National Development.

Legal Cases Related to Taxation

In the 2015 tax year, there was 1 (one) tax problem faced by BNI, as has been disclosed in detail in the legal cases section, tax cases sub-section. However, this problem has no impact on the sanctions imposed by the relevant authorities on BNI.

In 2024, there were no cases of tax problems faced by BNI.

Anti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction (APU, PPT, and PPPSPM)

Along with the development of the era of globalization and advances in increasingly complex information technology, BNI realizes that the business risks it faces are increasingly diverse, so appropriate and careful risk mitigation steps are very necessary, especially in formulating strategies for handling the risks of money laundering, terrorism financing, and funding the proliferation of weapons of mass destruction.

To prevent misuse of the banking system by irresponsible parties as a means of committing criminal acts of money laundering and terrorism financing, BNI always carries out banking operational activities by prioritizing the principle of prudence, and is always committed to improving the quality of the implementation of the APU PPT and PPPSPM programs, which are in line with POJK No. 8 of 2023 concerning Implementation of Anti-Money Laundering Programs, Counter Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction in the Financial Services Sector, as well as applicable related provisions and legislation, including the implementation of APU, PPT, and PPPSPM programs, which refer to International Best Practices, and Bank Business Plans.

In addition to carrying out obligations, the APU & PPT program implemented within BNI also shows BNI's commitment as a Financial Services Institution (LJK) in building a healthy and sustainable financial industry ecosystem that is free from all forms of money laundering, terrorism financing, and proliferation funding. To prevent the practice of Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT), which are categorized as transnational crimes and therefore require extraordinary efforts in handling them, BNI is very careful in measuring AML & PPT risks at the customer level (customer risk rating) as well as individual Risk Assessments (IRA).

To support the effective implementation of the APU PPT and PPPSPM programs, BNI has a Special Work Unit (UKK) and Regional Compliance Officer (RCO) in all Regional offices, which are responsible for implementing the APU PPT and PPPSPM Programs. RCO has the function of supervising the implementation of the APU PPT and PPPSPM Programs in each Branch Office under the management of each region and is tasked with ensuring that branch operational activities are carried out in accordance with the implementation of the APU PPT and PPPSPM Programs.

APU, PPT, and PPPSPM Policies and Procedures

The Bank continues to strive to raise awareness of all employees at every level of the organization to have a strong commitment to combating TPPU TPPT and PPPSPM practices or other financial crime threats that have a negative impact on BNI's integrity and can threaten the national and international financial system. Accordingly, BNI consistently builds a strong risk culture, one of which is through the implementation of the APU, PPT, and PPPSPM programs so that the Bank can avoid the risks of misuse of Bank products and services as a medium for money laundering and terrorism financing and funding the proliferation of weapons of mass destruction.

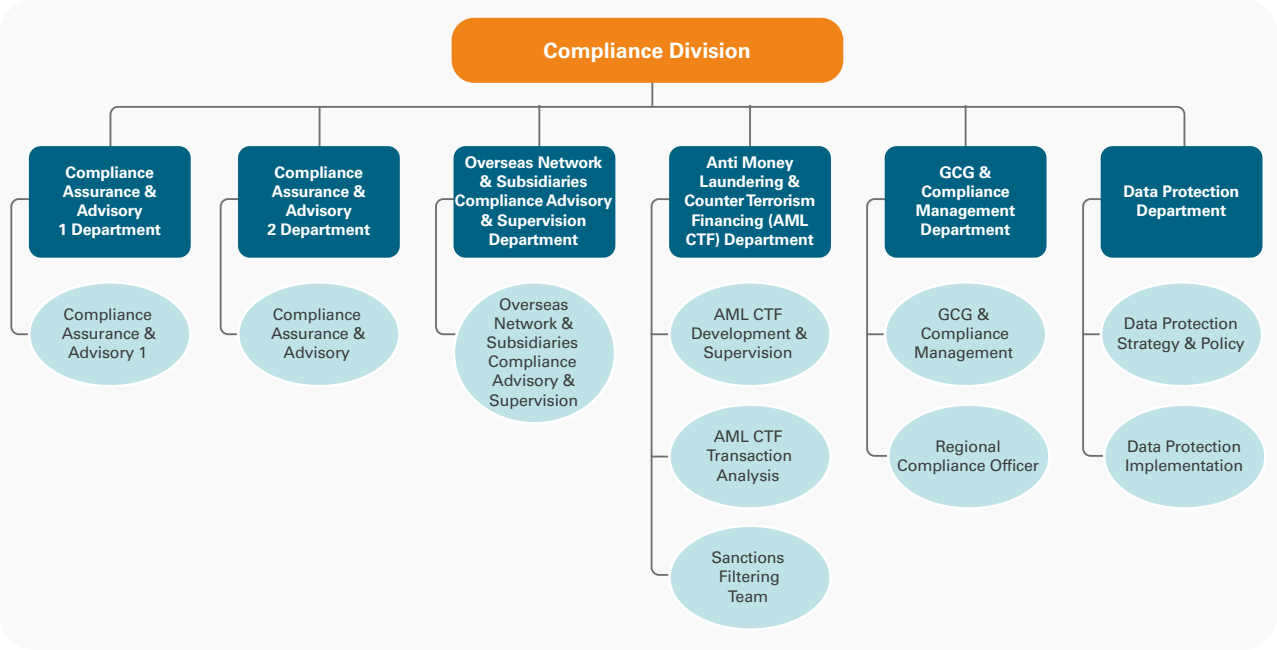
As a form of the Bank's commitment to building a national financial system with integrity, BNI has specifically designed policies and procedures related to the implementation of the APU, PPT, and PPPSPM programs, which have been stipulated through the Board of Directors' Decree No. KP/369/DIR/R dated August 23, 2024. The preparation of internal guidelines and policies certainly does not only consider the Bank's business needs but is also aligned with relevant laws and regulations. In general, the contents of policies and procedures related to the implementation of BNI's APU, PPT, and PPPSPM programs are based on 5 (five) main pillars, which are priorities in POJK No. 8 of 2023, namely:

1. Active supervision of the Board of Directors and Board of Commissioners;
2. Policies and Procedures;
3. Internal Control;
4. Management Information System; and
5. Human Resources and Training.

APU, PPT, and PPPSPM Organizational Structure

BNI appointed the Compliance Division as UKK, which is responsible for ensuring the Bank's compliance with APU, PPT, and PPPSPM regulations and is tasked with carrying out regular risk assessments to identify and manage potential risks that may arise.

The organizational structure of APU, PPT, and PPPSPM, which is in effect as of December 31, 2024 can be described as follows:



APU, PPT, and PPPSPM Manager Profile

The profile of the Compliance Division Leader who is assigned as UKK for Managing APU, PPT, and PPPSPM has been described in detail in the Corporate Governance Chapter, Compliance Function Sub-Chapter in the description entitled Profile of the Compliance Division Head.

Duties and Responsibilities of APU, PPT, and PPPSPM Managers

Duties and responsibilities of the BNI UKK Head Office, cq. The Compliance Division regarding the implementation of the APU, PPT, and PPPSPM Programs are:

1. Develop and manage policies and guidelines for implementing the Principles of Recognizing Service Users (PMPJ)/Know Your Customer (KYC), Anti-Money Laundering (APU) Programs, and Counter Terrorism Financing (PPT) at BNI.
2. Provide compliance opinions/advice regarding the implementation of PMPJ and APU PPT.
3. Develop and ensure the adequacy of systems and mechanisms that support PMPJ and APU PPT.
4. Conduct socialization regarding PMPJ and APU PPT provisions.
5. Building awareness of understanding of APU PPT to all lines of the BNI organization.
6. Identify and analyze transactions that meet suspicious criteria based on financial transaction analysis reports from related work units and/or based on the results of monitoring carried out based on the system.
7. Manage the preparation and submission of Suspicious Financial Transaction Reports (LTKM), Cash Financial Transaction Reports (LTKT), Transaction Reports to and from Overseas (LTKL), SIPESAT Reports, Information System Reports for Suspected Terrorism Financing (SIPENDAR), and other reports in accordance with the criteria set out in the provisions applicable to PPATK.
8. Monitor and supervise the implementation of APU PPT in all domestic branches and related Units/Divisions.

Implementation of the APU, PPT, and PPPSPM Programs in 2024

In 2024, BNI has implemented various sustainable initiatives and improvement efforts to strengthen the realization of the APU, PPT, and PPPSPM programs, including the following:

1. Bank Risk assessment of TPPU, TPPT and/or PPSPM using a regular risk-based approach (RBA) that is periodically reviewed.

2. Active Supervision of the Board of Directors and the Board of Commissioners is necessary in creating effectiveness in the implementation of APU, PPT, and, PPPSPM Program, since the role of the Board of Directors and the Board of Commissioners will affect the achievement level of organizational objective. The active supervision also applies to BNI wide network across all branches and subsidiaries under the same Financial Conglomerate. The forms of active supervision by the Board of Directors and the Board of Commissioners includes:
   a. The approval by the Board of Directors on the designation of the Compliance Division as a Special Work Unit (UKK) that responsible for implementing the APU PPT and PPPSPM Programs;
   b. The approval by Board of Directors and the Board of Commissioners for the APU, PPT, and PPPSPM;
   c. Evaluate the Policies and Procedures for implementing the APU, PPT, and PPPSPM programs;
   d. Periodic reports (monthly, quarterly and semi-annually) regarding reporting obligations and implementation of the APU, PPT, and PPPSPM Programs to the Board of Directors and the Board of Commissioners;
   e. Board of Directors approval of the Plan and Realization Report on Updating Customer Data;
   f. Meeting of the Board of Directors and the Board of Commissioners to discuss the implementation of the APU, PPT, and PPPSPM Programs.

3. There are Policies & Procedures prepared by the Compliance Division and periodically reviewed/updated/ improved in accordance with applicable regulations. To strengthen the implementation of the APU, PPT, and PPPSPM programs, procedures for each banking product and activity are also regulated in procedures for implementing APU, PPT, and PPPSPM, in order to identify and assess the risk of money laundering crimes and/or terrorist financing crimes for each product and activity. To ensure that the implementation of the APU, PPT, and PPPSPM programs is running as it should, supervision is carried out by the Compliance Division. Policies and procedures for implementing the APU, PPT, and PPPSPM programs include, among other things, regulating:
   a. Active supervision of the Board of Directors and the Board of Commissioners;
   b. Customer Due Diligence Procedures (CDD) and/or Enhanced Due Diligence (EDD) against Prospective Customers/Beneficial Owners (BO)/Walk in Customers (WIC), including ensuring the Potential Customers/Customers/ Beneficial Owner (BO)/Walk in Customers (WIC) is out of the list of suspected terrorists and terrorist organizations (DTTOT) and/ or the list of weapons proliferation of mass destruction (DPPSPM); and other watchlist lists (OFAC List, UN List);
   c. The Implementation of the APU, PPT, and PPPSPM Programs based on a Risk-Based Approach;
   d. Procedures for Customer Profile and Transactions Monitoring;
   e. The implementation of Fund Transfer Procedures;
   f. Administrating Customer Documents and Transactions;
   g. The Implementation of APU, PPT, and PPPSPM Programs across Branches and Subsidiaries Networks under the same Financial Conglomerate;
   h. Internal control; and
   i. Human Capital and Training.
   j. Maintenance and updating of DTTOT & DPPSPM for the needs of screening prospective customers and BNI customers;
   k. Obligation to ensure that Supporting Professional Services have implemented APU, PPT, and PPPSPM programs, and are registered in the reporting information system managed by PPATK;
   l. Pre-employee screening procedures for permanent and non-permanent employees up to 1 (one) level below the Board of Directors and Board of Commissioners, as well as Know Your Employee for permanent and non-permanent employees, Board of Directors and Board of Commissioners;
   m. Customer Profile and Transaction Monitoring Procedures; and
   n. Implementation of APU, PPT, and PPPSPM Programs in the Office Network and Subsidiaries in the Financial Conglomeration;
4. Effective internal control in and the APU PPT and PPPSPM implementation, carried out by:
   a. Having adequate APU, PPT, and PPPSPM policies and procedures as well as internal monitoring;
   b. Having clear authorities and responsibilities for work units related to the APU, PPT, and PPPSPM programs, either through the first line of defense (risk taking units), second line of defense and third line of defense; and
   c. Conducting inspections by the Internal Audit to ensure the APU, PPT, and PPPSPM Programs are effectively implemented.
   d. Follow up on all internal and external audit results related to the implementation of APU, PPT, and PPPSPM in accordance with the specified time; And

e. Improving the quality of customer data and reporting analysis to regulators in accordance with regulations.

5. Information Management System to optimize APU, PPT, and PPPSPM transaction monitoring program, BNI has been developing information system technology, including: [ACGS B.4.1]
   a. Improving the systems and supporting applications for Anti Money Laundering Detection System, Filtering & Screening Terrorist (DTTOT List), PEP Screening Detection and Customer Due Diligence (CDD) Risk Scoring, as a batch or real time, in the BNI AML System. The BNI AML System is used to support a better Know Your Customer (KYC) Principle, particularly in detecting/ monitoring customer transactions that have suspicious patterns on behavior and transaction for money laundering, and the financing of terrorism, and the financing of the proliferation of weapons of mass destruction.
   b. Developing and improving the Suspect Account to Verify (SAV) system.
   c. Developing a Walk in Customer application system.
   d. Developing a Politically Exposed Person (PEP) data utilization PPATK application.
   e. Developing a KYC on Board application to filter and screen prospective customers against the Terrorist Data/Terrorist List (DTTOT), the List of Proliferation of Weapons of Mass Destruction (PPSPM), PEP List, OFAC List, UN List and Fraudulent List.
   f. Developing an internal application system to support the reporting obligations in accordance with the PPATK GoAML reporting format and requirements.
   g. Developing the GoAML interface system to support the reporting obligations that have been adjusted to the GoAML provisions.
   h. Developing PPATK's Suspected Terrorism Financing Information System (SIPENDAR);
   i. Developing Filtering & Screening Terrorist (DTTOT List), PEP Screening Detection for digital account opening.

6. Human Capital and Training
   BNI conducts training, socialization and reminder of the implementation of APU, PPT, and PPPSPM Programs to officials and/or for all employees continuously. The training methods are as follows:
   a. Training, both in person or virtually, including:
      i) Electronic/Online base training, that is training through APU PPT and PPPSPM e-Learning on BNI Smarter, with a minimum passing grade, equipped with Pre Test and Post Test for all participants, Learning Videos, Webinars and Podcasts;
      ii) Face-to-face training, that is training provided to Prospective New Employees (ODP), certain divisions/units (including operational, IT, Custody, overseas business, Cross Border Correspondent Banking).
   b. Supervision and Socialization of the APU, and PPT Program at sampled Branch (based on the results of the Branch Risk Rating assessment), related Units and Divisions.
   c. Implementation of APU, PPT, and PPPSPM refreshment programs for the Board of Commissioners and the Board of Directors of BNI as well as Subsidiary Companies.
   d. Increasing employee awareness and competency by delivering reminder letters regarding typologies, the latest modes and lessons learned related to APU, PPT, and PPPSPM to all Branch Offices, Regions, Divisions, Units and Units.

7. Implementing programs to improve the quality of customer data by applying the Completeness, Consistency and Composite methods to strengthen the Single Source of Truth (SSOT) aspect through customer data quality improvement programs, such as, improving data governance policies, implementing the Data Quality Index (DQI) and implementing Master Data Management towards creating a Single View of Customer;

8. Establish and foster active cooperation and coordination with regulators and Law Enforcement Officials, especially in fulfilling requests for customer data and/ or information as well as providing information in efforts to prevent and eradicate the crime of money laundering, preventing the financing of terrorism and preventing the financing of the proliferation of weapons of destruction. Bulk;

9. Implementation of the APU, PPT, and PPPSPM Programs in Subsidiary Companies and Foreign Offices. As a form of responsibility for Banks that have office networks both at home and abroad as well as within the framework of the BNI Financial Conglomeration, to ensure that the implementation of APU, PPT, and PPPSPM is effective, the Compliance Division also supervises the implementation of the APU PPT and PPPSPM Programs through:
   a. Discussion Forum for the Board of Directors and Board of Commissioners regarding the implementation of the integrated APU, PPT, and PPPSPM Program;

b. Monitoring the implementation of the APU, PPT, and PPPSPM Programs for Subsidiaries and Foreign Offices through regular periodic reports and providing feedback on the reports submitted;
c. Implementation of supervision in the form of One on One meetings to discuss the implementation of the APU, PPT, and PPPSPM Programs for Subsidiaries and Overseas Offices on a quarterly basis; and
d. Review of the Foreign Office's APU, PPT, and PPPSPM program policies and procedures in accordance with applicable regulations.

10. Play an active role in work programs or activities organized by the regulator, as follows:
    a. Arranging training programs with the Human Capital & Compliance Director Communication Forum (FKDKP) regarding APU PPT and PPPSPM for banking circles so that there is a same playing field/a common understanding in implementing the APU PPT and PPPSPM provisions.
    b. Joined in the Collaborative Analysis Team (CAT) in preparation for the General Election (Pemilu) and regional elections (Pilkada) in order to realize honest, fair, integrity, and accountable elections and regional elections.
    c. Coordinating in the implementation of the 22 Years APU PPT Indonesia National Movement ("Gernas 22"), which carries the theme: "22 Years together, 2 Decades Stronger, Excellence in Every Step".
    d. Involved in the PPATK Public Private Partnership (PPP) for the investment fraud typology and acted as co-leader in the PPP team for the Green Financial Crime (GFC) typology.
    e. Conduct education and provide financial literacy to internal and external parties regarding awareness of the practice of buying and selling accounts in order to contribute to the eradication of online gambling.
    f. Carry out monitoring (cyber patrol) on online gambling websites that use BNI accounts.
    g. Prepare APU PPT and PPPSPM Certification Modules based on OJK's SKKNI, together with FKDKP.

Legal Cases Related to APU, PPT, and PPPSPM in 2024

In carrying out its operational activities, BNI ensures that it always obeys and complies with the laws that apply to the financial services sector, especially the banking industry. Through the implementation of the APU, PPT, and PPPSPM programs, which are regularly disseminated to employees and customers, BNI avoids all forms of criminal acts of money laundering and terrorism financing, as well as funding the proliferation of weapons of mass destruction.

Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)

FIR on ML/TF is an assessment by the Financial Transaction Analysis Reporting Center (PPATK) on the integrity and effectiveness of the reporting party in carrying out the APU, PPT, and PPPSPM programs, which include aspects of commitment, implementation, and compliance. In 2024, BNI obtained an FIR on the ML/TF Score of 9.03 in the Very Good Category (FIR Highest Score on ML/TF on KBMI 4).

APU, PPT, & PPPSPM Work Plan for 2025

In 2025, BNI has established a work plan to support the implementation of the APU, PPT, and PPPSPM Programs with the following strategic priorities:

1. Increase employee awareness and competence regarding the implementation of APU, PPT, and PPPSPM;
2. Improving customer data quality through customer data quality improvement programs, e.g., improving data governance policies, implementing the Data Quality Index (DQI), and implementing master data management towards creating a Single View of Customer.
3. Updating internal policies and procedures in accordance with applicable regulations.
4. Developing the BNI AML System and other applications to support the optimization of APU, PPT, and PPPSPM implementation;
5. Improve the quality of reporting analysis to regulators in accordance with provisions;
6. Follow up on all internal and external audit results related to the implementation of APU, PPT in accordance with the specified time;
7. Actively coordinate with Regulators and Law Enforcement Officials in fulfilling requests for data and providing information in efforts to Prevent and Eradicate Crimes of Money Laundering and Counter Terrorism Financing.

Anti-Corruption Policy

BNI reaffirms its unwavering commitment to anti-corruption policies by ensuring that all of its activities strictly adhere to prevailing laws and regulations and uphold the principles of sound corporate governance. As a demonstration of this commitment, the Board of Commissioners, Board of Directors, and all BNI employees annually sign an Integrity Pact. This pact embodies a shared commitment to fostering a corruption-free work environment. Furthermore, all BNI stakeholders are required to sign the Integrity Pact and are provided access to the Whistleblowing System (WBS) for reporting violations.

BNI enforces stringent sanctions against employees found violating anti-corruption policies or engaging in corrupt practices, including gratification and bribery. Through these measures, BNI aims to safeguard the trust of shareholders, stakeholders, and the broader community.

Programs and Procedures to Combat Corruption, Fraud, Bribery, Gratification, and/or Improper Compensation [ACGS B.4.5]

To reinforce its commitment to good governance and maintain integrity across all operational levels, BNI has developed and implemented comprehensive programs and procedures to address corruption, fraud, bribery, gratification, and/or improper compensation. Key initiatives include:

1. BNI has established the Gratification Control Unit (UPG) and manages the Anti-Bribery Management System (SMAP), which serve as the cornerstone of BNI anti-corruption program. Policies on gratification and bribery are detailed in the Anti-Gratification and Anti-Bribery Guidelines.
2. BNI imposes firm penalties, including termination of employment (PHK), on employees involved in gratification, bribery, or fraud, to deter misconduct and uphold corporate integrity.
3. To promote anti-fraud awareness, BNI organizes regular initiatives for all employees and subsidiaries. These activities include webinars, socialization programs, and campaigns on BNI's official social media channels.
4. BNI acknowledges employees who actively contribute to fraud prevention efforts, fostering a culture of appreciation for integrity in maintaining a deviation-free workplace.

These initiatives underscore BNI›s dedication to creating a work environment free from corruption, fraud, bribery, and gratification.

Anti-Corruption Training and Socialization for Employees

BNI remains steadfast in its efforts to ensure that all employees have access to the training and certifications necessary to cultivate a workplace culture free from corruption, gratification, and bribery. BNI consistently involves its workforce in various training programs to enhance their understanding and commitment to anti-corruption initiatives. These programs include the Anti-Corruption Facilitator Training (PAKSI) and certification for the Anti-Bribery Management System (SMAP) under ISO 37001:2016 standard, and 3 (three) webinars, E-Learning modules and the Daily Exercise Employee Program (DEEP46), conducted on June 8 - July 3, 2024. BNI hosted these sessions featured anti-gratification materials as part of the broader anti-fraud awareness initiative for new employees. In addition, BNI routinely conducts socialization programs on gratification control and anti-bribery measures to ensure all employees understand and apply sound governance principles in their daily work activities.

In 2024, BNI successfully increased employee participation in the following key activities:

1. Mandatory e-Learning Program on Gratification Control and SMAP through BNI's learning management system (BNI Smarter) attended by 26,352 employees.
2. Socialization and awareness raising on anti-fraud and anti-gratification to employees and other stakeholders.
3. Socialization of Gratification Control and SMAP to Outsourced Personnel, Bina BNI, Officer Development Program (ODP) and BNI Subsidiaries.
4. Appeal to all employees not to receive or solicit rewards from third parties, and to read the Integrity Pact which informs BNI's commitment to gratification control.
5. Dissemination of information through posters, videos, digital banners, videotrons, BNI website, national mass media, and BNI Forum related to anti-gratification, SMAP, and corruption prevention guidelines.
6. Implementation of the Compliance Forum event with the theme "Realizing an Anti-Corruption Culture Through Planting Integrity Values" which invited speakers from the KPK and was attended by all levels of Directors, Commissioners, SEVP BNI, Subsidiaries, PAKSI, API, Millennial Gratification Reporters and all BNI employees.

Anti-Gratification & Anti-Bribery Policy

In an effort to enforce anti-corruption policies, BNI ensures that the business activities carried out always comply with applicable laws and regulations and implement GCG practices under the supervision of the Board of Commissioners. The Bank is also committed to taking firm action against every employee who is proven to carry out business processes illegally, unethically, dishonestly, and unprofessionally with the aim of enriching themselves, which then causes losses for the Bank and other stakeholders.

BNI's commitment and consistency in creating business practices that are free from bribery and corruption is realized through the implementation of the Gratification Control Policy, which all employees must pay attention to when working, including submitting reports of acceptance or rejection of gratification via the Gratification Online (GOL) application. With the existence of an anti-bribery and anti-gratification policy within BNI and a joint commitment from all employees, BNI can maintain the continuity of its business and avoid negative impacts such as legal risks, financial losses, negative reputation, or loss of customers. Implementing this policy can also maintain the Bank's reputation and the trust of all shareholders, stakeholders, and the wider community.

In addition to having adequate control policy tools, the Bank also strives to build a healthy and clean work culture through obtaining SNI ISO 37001:2016 certification - Anti-Bribery Management System (SMAP) in the scope of Procurement of Goods and Services, which is then expanded to cover the scope of the Corporate Credit Segment and BNI Pension Fund Activities.

ANTI-GRATIFICATION AND ANTI-BRIBERY POLICY PROGRAMS AND PROCEDURES

In order to overcome corrupt practices, kickbacks, fraud, bribery, and/or gratification, all BNI levels are required to implement anti-bribery and anti-gratification programs and procedures as stated in Gratification Control Guidelines No. IN/709/KPN/002 dated December 2, 2020, Anti-Bribery Management System Policy (SMAP) No. IN/616/KPN/001 dated July 21, 2022, and Anti-Bribery Management System (SMAP) Company Guidelines No. IN/118/CMP/006 dated December 27, 2024. The preparation of these policies and guidelines has been aligned with the provisions of Law No. 20 of 2001, which is an amendment to Law No. 31 of 1999 concerning the Eradication of Corruption Crimes; OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions.

BNI's initiative in increasing employee awareness of anti-corruption practices and culture as well as preventing gratification is realized through the implementation of several written policies related to preventing corruption and controlling gratification, including:

A. Gratification Control Policy

BNI's Gratification Control Policy stipulates, among other things, that:

1. Gratification control is the duty and responsibility of all BNI personnel.
2. Prohibition of accepting or giving gratuities that are indicated as bribery, namely:
   a. All BNI personnel are prohibited from accepting gratuities that are indicated as bribery, whether in the form of money and/or goods and/or gifts, and are required to refuse the gift at the first opportunity by informing them of the gratification control provisions at BNI. Receipt of gratuities includes those received directly or those transferred via account or other means.
   b. Upon receipt of gratuities that are forced to be accepted, all BNI personnel must immediately report at the first opportunity to the Corruption Eradication Commission through the Gratification Control Unit (UPG).
   c. All BNI personnel are prohibited from giving money and/or gratuities and/or gifts related to their position and contrary to their obligations or duties to civil servants and state administrators.

3. Obligation to submit gratification reports:
   a. All BNI personnel are required to make a report regarding rejection or acceptance of gratification.
   b. Recipients who have submitted a gratification report are free from the threat of criminal acts of bribery as regulated in Law No. 31 of 1999 as amended by Law No. 20 of 2001 concerning the Eradication of Corruption Crimes.

B. Bribery Control Policy

BNI's Anti-Bribery Control Policy stipulates, among other things, that:

1. Maintain Integrity, Professionalism, Banker Ethics, Transparency, Honesty, Consistency and always adhere to the Law and all applicable regulations as well as the Work Culture Values of companies and State-Owned Enterprises.
2. Must refuse giving and receiving bribes in order to uphold the principles of Good Corporate Governance and be free from all forms of Corruption, Collusion and Nepotism.
3. All BNI and Subsidiary Company personnel must play an active role in ensuring the implementation of the Anti-Bribery Management System and must report and take firm action against all forms of violations of the Anti-Bribery Policy.
4. Support the independent Anti-Bribery Compliance Function to develop and encourage continuous improvement of the Anti-Bribery Management System and provide strict supervision in the implementation phase.

C. Anti-Corruption Control Policy

The Anti-Corruption Control Policy at BNI stipulates, among other things, that:

1. Maintain Integrity, Professionalism, Banker Ethics, Transparency, Honesty, Consistency and always adhere to the Law and all applicable regulations as well as the Work Culture Values of companies and State-Owned Enterprises.
2. Must refuse giving and receiving bribes in order to uphold the principles of Good Corporate Governance and be free from all forms of Corruption, Collusion and Nepotism.

The policies mentioned above are binding and must be understood and implemented seriously by all levels of BNI personnel as part of the Code of Ethics and in order to support the implementation of GCG principles. If there is a violation or non-compliance with this policy, the violating party may be subject to sanctions according to the level of the violation and will be reported to the relevant parties in accordance with applicable law.

MONITORING AND ASSESSMENT OF GRATIFICATION CONTROL BY THE CORRUPTION ERADICATION COMMISSION

In order to increase the effectiveness of gratification control and prevent the occurrence of bribery practices or other acts of fraud/financial crimes that violate legislation, BNI established a Gratification Control Unit (UPG), which is placed in the Compliance Division to monitor and ensure that anti-bribery and gratification control policies and procedures are works as they should. In accordance with applicable internal regulations, BNI UPG is responsible for carrying out the following tasks:

1. Prepare rules, technical instructions, and other similar requirements to support the implementation of gratification control;
2. Receive, analyze, and administer reports of receipt and rejection of gratification. If necessary, UPG can ask the recipient of the gratification for information regarding the completeness of the gratification report.
3. Forward reports on receipt of gratuities to the Corruption Eradication Committee in accordance with applicable regulations.
4. Submit the results of the management of gratification reports and proposed gratification control policies to management/Board of Directors.
5. Map the vulnerable points for receiving and giving gratuities
6. Monitoring and evaluating the implementation of gratification control at BNI.
7. Carrying out advisory and socialization functions related to gratification control within BNI.
8. Coordinate with related units at BNI to carry out their duties and responsibilities as a gratification control unit at BNI.
9. Store gratification items and/or gratuity gifts and forward them to the Corruption Eradication Commission or convey them back to the reporter in accordance with the decision issued by the Corruption Eradication Commission and/or UPG.

As part of the implementation of its main duties, BNI UPG submits quarterly reports regarding the implementation of the Bank Gratification Control Program to the Corruption Eradication Commission (KPK). Furthermore, the Corruption Eradication Committee (KPK) carried out an assessment of gratification control based on 6 (six) predetermined criteria, namely:

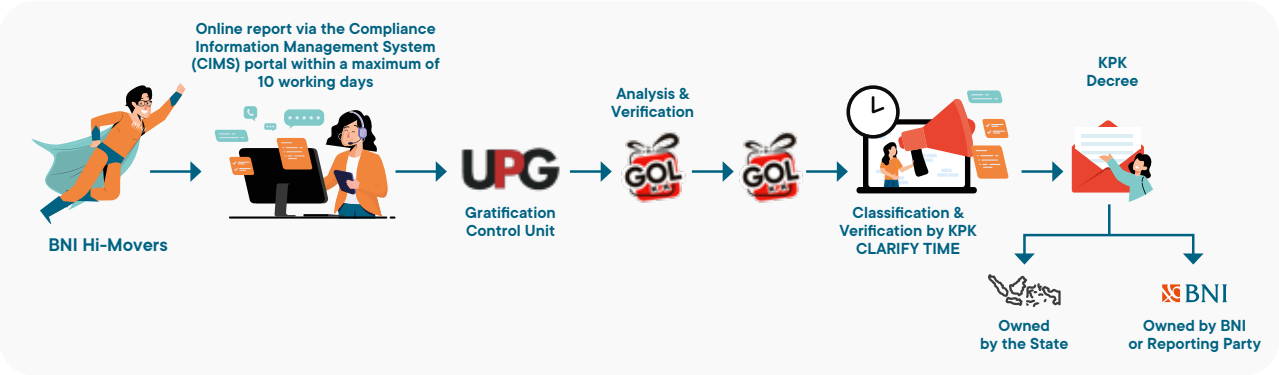
1. Internal Dissemination
2. External Dissemination
3. Identify risks/prone points for gratification
4. Risk Mitigation
5. Innovation
6. Handling Gratification Reporting

These criteria are the basis for the Corruption Eradication Committee (KPK) in evaluating the effectiveness of BNI's gratification control programs and efforts. Thanks to the consistency and shared commitment of all BNI personnel, in 2024, BNI UPG succeeded in achieving a Very Good rating for the Implementation of the Gratification Control Program (PPG).

GRATIFICATION REPORTING MECHANISM

To support the effectiveness of reporting gratuities, all BNI employees are required to submit their reports to BNI UPG via digital reporting media, which has been provided through the Compliance Information Management System (CIMS) portal with the link cims.bni.co.id. This reporting facility has been integrated with the Online Gratification (GOL) application from the Corruption Eradication Committee so that the reporting process is faster, more efficient, and more transparent. Implementation instructions and technical instructions related to this reporting can be accessed via BNI ePP or BNI Forum.

The explanation of the gratification reporting mechanism is as follows:



DECLARATION OF INTEGRITY PACT, CODE OF ETHICS, AND ANTI-BRIBERY AND ANTI-CORRUPTION COMMITMENT

In 2024, BNI has implemented a declaration of an integrity pact, Code of Ethics, and anti-bribery and anti-corruption commitments as part of efforts to strengthen a culture of integrity throughout the organization. The integrity pact has been signed by the entire Board of Commissioners, Board of Directors, and all BNI employees. This integrity pact confirms our shared commitment to implementing ethical principles and ensuring compliance with applicable laws and regulations. This declaration shows BNI's seriousness in implementing transparent and accountable governance while at the same time instilling a sense of responsibility in every individual within the bank to maintain integrity in every aspect of work. This initiative is a strategic step for BNI to strengthen its position as a bank with integrity and reliability in supporting the national economy.

2024 GRATIFICATION REPORT

In 2024, there were 256 reports of gratification submitted by BNI employees to BNI UPG. A total of 44 reports were forwarded to the Corruption Eradication Commission as gratification reports that must be reported, while the other 212 reports were included in gratuities that did not have to be reported.

ANTI-BRIBERY MANAGEMENT SYSTEM (SMAP)

In addition to gratification control efforts, BNI also appointed the Compliance Division as the manager of the Anti-Bribery Management System (SMAP). Thus, this effort is in line with BNI's commitment to improve integrity and transparency in every aspect of its operations.

In addition to efforts to control gratification, BNI also appointed the Compliance Division as manager of the Anti-Bribery Management System (SMAP). Thus, this effort is in line with BNI's commitment to increasing integrity and transparency in every aspect of its operations.

On August 11, 2020, BNI succeeded in achieving ISO 37001:2016 certification for the scope of Procurement of Goods and Services. Subsequently, on February 9, 2022, the scope of this certification was expanded to cover the Corporate Credit Segment, and in 2023, the certification was again expanded to cover Pension Fund Activities. Achieving this certification shows that BNI has successfully managed the gratuity control system, anti-bribery, and whistleblowing system in accordance with ISO standards and international best practices.

SOCIALIZATION OF ANTI-GRATIFICATION POLICY, GRATIFICATION REPORTING, AND ANTI-BRIBERY

In order to increase employee awareness in supporting the government's corruption prevention and eradication program, BNI regularly conducts socialization and provides training for employees regarding gratification and anti-bribery through various channels, such as webinars, the BNI website, and print media. Additionally, BNI also utilizes internal media, including BNI Forum, BNI Digi-HC, BNI Menyapa email, Instagram Quickpose, and Instagram BNI46, to reach employees and stakeholders.

Several forms of activities, educational programs, and socialization that have been carried out by BNI UPG in 2024 include:

1. Submission of Gratification Acceptance and Rejection Report at the BNI Forum.
2. Signing of the Gratification & Anti-Bribery Declaration via the DigiHC application
3. Technical Guidance on filling out the Corruption Prevention Guide (CEK) for the Corruption Eradication Commission (KPK) on the JAGA portal (jaga.id) for all Subsidiary Companies at BNI on March 18-21, 2024.
4. Socialization of SMAP and Commemoration of World Anti-Corruption Day (HAKORDIA) to internal and external parties through video, digital banners, and videotrons at the BNI Office.
5. Appeal to the Board of Directors, Board of Commissioners, and all Divisions/Units not to give/receive gratuities related to religious holidays (Imlek, Eid al-Fitr, and Christmas) and New Year, which are also broadcast via the BNI Forum, which can be accessed by all employees as well as BNI stakeholders through posters, the BNI website, and national mass media.
6. Implementation of the 1st Year 2024 Surveillance Audit with audit results containing no major or minor findings, thus showing BNI's commitment and consistency regarding the implementation of SMAP.
7. Socialization by the Gratification Control Unit and/or Regional Compliance Officer (RCO), including:
   a. Sharing Session on Gratification Control and SMAP with all Subsidiary Companies (PA) during the PA Workshop as a BNI Financial Conglomerate.
   b. Sharing Session on Gratification Control and SMAP with all organizations in Regional Offices and Branch Offices.
   c. Sharing Session on Gratification Control and SMAP with hibank, which is one of BNI's Subsidiary Companies.
8. Implementation of the Compliance Forum event on August 14, 2024, with the theme "Creating an Anti-Corruption Culture Through Instilling Integrity Values," which invited speakers from the Corruption Eradication Commission and was attended by all levels of the Board of Directors, the Board of Commissioners, SEVP BNI, Subsidiary Companies, PAKSI, API, Millennials Gratuity Reporters, and all BNI employees.

Policy for Procurement of Goods and/or Services

To ensure the smooth execution of its business and banking operations, BNI requires goods and/or services aligned with its needs. These requirements drive BNI to conduct procurement activities in accordance with regulations and internal policies, as stipulated in the Regulation of the Minister of State-Owned Enterprises No. PER-02/MBU/03/2023 on Guidelines for Corporate Governance and Significant Corporate Activities of State-Owned Enterprises. BNI has established a written policy governing the procurement of goods and/or services, encapsulated in its Corporate Procurement Guidelines.

By adhering to regulations and internal policies concerning procurement, BNI ensures that every procurement process is conducted transparently and upholds high accountability standards at every stage from requirement planning, supplier selection, to the handover of deliverables. The aim is to ensure that each step is carried out efficiently, effectively, and in alignment with good governance principles, maximizing benefits for both BNI and its stakeholders.

In demonstrating its commitment to environmental, social, and domestic production priorities, as well as empowering Micro and Small Enterprises (MSEs), BNI's procurement process does not solely focus on economic factors.

During procurement execution, BNI ensures that suppliers adhere to commitments regarding Environmental, Social, and Governance (ESG) standards. This approach promotes responsible procurement, enhances transparency, and minimizes environmental impact.

Regarding the enhancement of domestic product utilization in procurement, BNI supports this initiative by requiring suppliers to possess Domestic Content Certification (TKDN) in compliance with applicable regulations. Additionally, BNI empowers MSE suppliers to meet its goods and/or service requirements.

To ensure the procurement process aligns with prevailing regulations, BNI conducts routine audits of goods and/or services procurement to confirm adherence to applicable rules and procedures.

In pursuing best practices in procurement processes, BNI has implemented ISO 37001:2016 certification for Anti-Bribery Management Systems (ABMS) and ISO 9001:2015 certification for Quality Management Systems. This demonstrates BNI's commitment to enforcing robust controls against gratuities, bribery, and whistleblowing systems, as well as its adherence to international quality management standards established by ISO.

Throughout 2024, BNI remains steadfast in applying these principles to fulfill its goods and/or services needs.

Core Principles of Procurement [ACGS B.4.2]

Procurement at BNI is grounded in principles designed to ensure that every stage of the process is conducted in a professional, transparent, and responsible manner. The application of these core principles ensures that BNI achieves optimal results by effectively utilizing resources, meeting needs efficiently, and fostering fair and healthy competition. By upholding stringent ethical standards, BNI commits to creating a trustworthy, open, and accountable procurement environment, mitigating potential misuse, and maximizing benefits for all involved parties.

The core procurement principles at BNI are articulated as follows:

1. **Efficiency**
   Procurement must aim to achieve the best and optimal results promptly by utilizing resources prudently, not merely focusing on the lowest price. Exceptions apply to strategic procurements of significant value, where total cost of ownership (TCO) approaches may be considered.

2. **Effectiveness**
   Procurement must align with established needs and deliver maximum benefits in achieving the specified objectives.
3. **Competitiveness**
   Procurement must be open to qualified suppliers and conducted through fair competition among equivalent vendors, adhering to clear and transparent rules and procedures.
4. **Transparency**
   All procurement-related information, including administrative and technical requirements, evaluation methods, evaluation results, and supplier selection, must be accessible to interested suppliers.
5. **Fairness and Reasonableness**
   BNI ensures equal treatment for all eligible suppliers during the procurement process.
6. **Openness**
   Procurement is accessible to all qualified suppliers.
7. **Accountability**
   Procurement must achieve targeted goals and be defensible, thereby minimizing the risk of misuse or deviation.

Ethics in Procurement [ACGS: B.4.2]

BNI firmly establishes procurement ethics for all parties involved. These ethics in procurement are upheld to promote sound procurement practices, enhance budget efficiency, minimize budget leakage, and ensure a clean procurement process.

The procurement ethics at BNI include:

1. Performing tasks diligently and responsibly to achieve procurement objectives and ensure smooth and timely execution.
2. Working professionally and independently while safeguarding confidential information to prevent procurement irregularities.
3. Avoiding any direct or indirect influence that may lead to unhealthy business competition.
4. Accepting and being accountable for all decisions made based on written agreements with relevant parties.
5. Preventing and avoiding conflicts of interest with any related parties that may result in unhealthy business competition.
6. Preventing and avoiding financial wastage and leakage.
7. Avoiding and preventing abuse of authority and/or collusion.
8. Refraining from offering, promising, or accepting gifts, rewards, commissions, rebates, or any other compensation from and for anyone related to procurement activities.

Methods and Mechanisms of Procurement of Goods and/Services [ACGS: B.4.2]

To achieve efficiency and effectiveness in procuring goods and services, BNI employs various methods tailored to the characteristics and requirements of each project. Procurement processes at BNI are conducted through methods such as Open Tender, Limited Tender, Direct Appointment, Direct Procurement, and Self-Management. Each method has specific criteria to ensure alignment with the objectives and principles of efficient and effective procurement.

The mechanisms for each procurement method are outlined accordingly:

Goods and Services Procurement Methods	Implementation Mechanism
Tender	Procurement of goods and/or services that are widely announced through mass media in order to provide opportunities for qualified goods and/or services providers to take part in the auction.
Limited Tender	Procurement of goods and/or services offered to several parties is limited to at least two bids.
Direct Appointment	Procurement of goods and/or services carried out directly by appointing one Goods and/or Services Provider or appointment through a beauty contest by taking into account the requirements of Direct Appointment.
Direct Procurement	Purchase of goods available in the market, thus the value is based on market prices, including e-purchasing.
Swakelola	Implementation of work done and/or supervised by BNI.

Overview of Goods and/or Services Procurement Procedures [ACGS: B.4.2]

Terms	The procurement of goods and/or services is governed by both external regulations and internal provisions (Corporate Guidelines).
Centralisation of Procurement	In principle, the procurement process adheres to a centralized system to ensure efficiency, effectiveness, and security. However, in certain instances, a decentralized procurement approach may be adopted to optimize the functions and authority of individual units while providing opportunities for local partners to participate in the procurement of goods and/or services.
Procurement Strategy	1. Enhancement of management quality 2. Implementation of open contracts and framework agreements to secure the best pricing 3. Segregation of procurement functions based on the type of work or goods 4. Improvement of vendor management policies, particularly regarding vendor acquisition based on classification or tiering 5. Digitization of the procurement process.
Separation of Functions	Separation of functions between the unit processing procurement and: 1. User Unit; 2. Procurement Unit that carries out the procurement process; 3. Vendor Management Unit that selects potential partners and recommends a list of procurement participants; 4. Unit that analyzes and prepares price reasonableness (Internal Price Estimate); 5. Unit that drafts contracts; 6. Unit that reviews the completeness of payment document requirements; 7. Unit that supervises and controls the project according to contract documents until project handover.
Leveling of Deciding Authority	The authority to decide on procurement is structured hierarchically, considering the level of risk and the procurement value, with decision-making conducted through the Procurement Committee mechanism.

PROCUREMENT THROUGH THE ELECTRONIC PROCUREMENT SYSTEM (E-PROC)

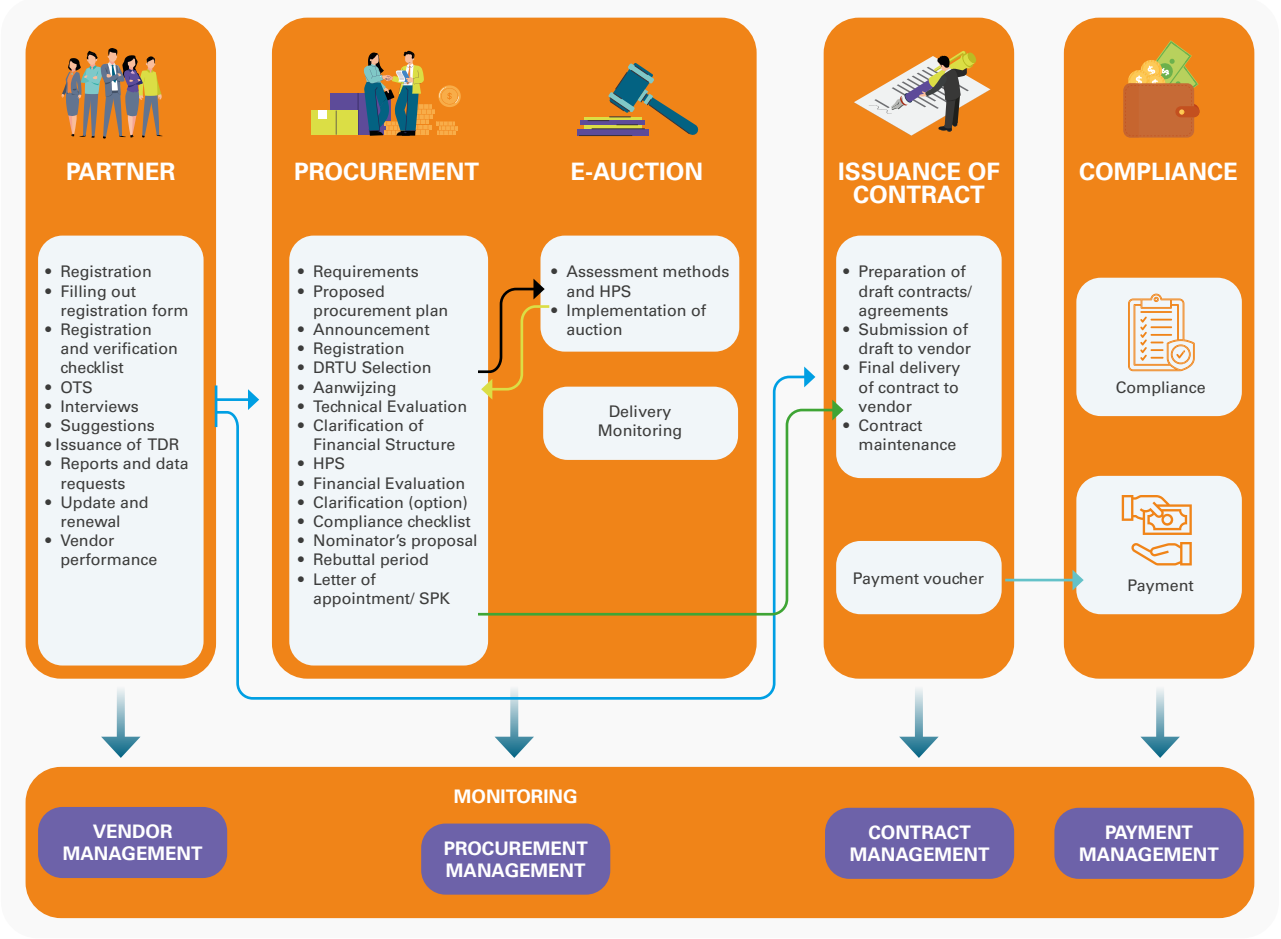
The procurement process for goods and/or services at BNI is conducted electronically via a web/internet-based system utilizing communication and information technology. Through this policy, all involved parties, including vendors/prospective partners, partners/prospective procurement participants, and the procurement committee, are connected online through an end-to-end platform that encompasses partner registration, procurement stages, compliance tests, contract signing, and payment processes.

The Electronic Procurement System (e-Proc) can be accessed via the BNI Corporate Website and the link: https://e-proc.bni.co.id. The design and policies of BNI's e-Proc system aim to support its transformation strategy toward digital banking, enabling the organization to compete in an increasingly digitalized banking industry. The BNI e-Proc system offers digitization of procurement processes through modules such as Procurement Management, Vendor Management, and Contract Management.

The electronic procurement policy through BNI's e-Proc is expected to enhance the quality of procurement process management by ensuring transparency and accountability, improving procurement efficiency, supporting monitoring and audit processes, and providing real-time and equal access to information for all partners involved in the procurement process.

Since 2018, e-Procurement has been implemented at the Head Office, aiming to integrate and effectively monitor all procurement processes conducted there.

FLOW OF PROCUREMENT PROCESS THROUGH ELECTRONIC PROCUREMENT (E-PROC) APPLICATION



CERTIFICATIONS RELATED TO THE MANAGEMENT OF PROCUREMENT OF GOODS AND/OR SERVICES

ISO 37001:2016 Anti-bribery Management System


TUVNORD

Sertifikat

Anti-Bribery Management System as per SNI ISO 37001 : 2016

SNI ISO 37001

PT BANK NEGARA INDONESIA (Persero) Tbk

Penerapan Sistem Manajemen Anti Penyuapan dalam Proses Pengadaan Barang & Jasa, Segmen Kredit Korporasi, dan Dana Pensiun

KAN

TUVNORDGROUP

In an effort to enhance integrity and transparency, BNI successfully obtained the SNI ISO 37001:2016 certification for its Anti-Bribery Management System on August 11, 2020, specifically covering the scope of Goods and Services Procurement. This certification was renewed on January 1, 2024, and is valid for three years, encompassing the Goods and Services Procurement Process, Corporate Credit Segment, and Pension Funds. BNI is committed to conducting all its activities based on principles of accountability and responsibility, implementing the AKHLAK values as the foundation of corporate governance, adhering to Principle 46, and complying with BNI's Code of Ethics and applicable regulations.

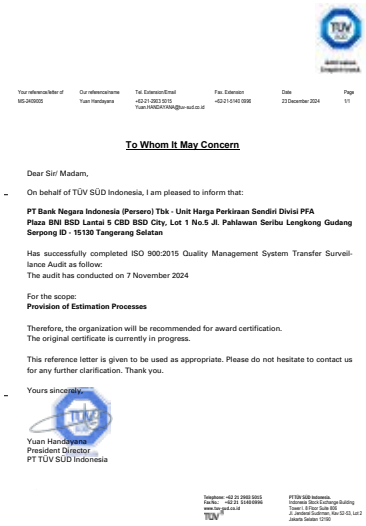
As a tangible manifestation of this commitment, BNI strives to:

1. Uphold honest, sincere, and disciplined behavior, and act with consistency and responsibility;
2. Implement statutory and internal regulations related to the Anti-Bribery Management System in every action and decision-making process;
3. Take a firm stance against all forms of bribery to establish good corporate governance and eliminate Corruption, Collusion, and Nepotism (CCN);
4. Actively ensure the implementation of the Anti-Bribery Management System, including reporting suspected violations of anti-bribery policies in accordance with the mechanisms in place at PT Bank Negara Indonesia (Persero) Tbk;
5. Accept the sanctions determined by the company if found in violation of the anti-bribery policy.

To combat CCN (Corruption, Collusion, and Nepotism) practices and bribery, BNI has designated the Compliance Division as an independent function responsible for developing and overseeing the implementation of the Anti-Bribery Management System. This unit is also authorized to take decisive actions against any violations. To ensure the Anti-Bribery Management System policy is well-received by all internal and external stakeholders, socialization efforts targeting the BNI environment and other stakeholders remain crucial.

In 2024, BNI successfully maintained its Anti-Bribery Management System Certification after undergoing a re-certification audit of goods and/or services procurement in 2023.

ISO 9001:2015 Quality Management System for Own Estimate Price Section (HPS)



To Whom It May Concern

Dear Sir/ Madam,

On behalf of TÜV SÜD Indonesia, I am pleased to inform that:

PT Bank Negara Indonesia (Persero) Tbk - Unit Harga Perkiraan Sendiri Divisi PFA
Plaza BNI BSD Lantai 5 CBD BSD City, Lot 1 No.5 Jl. Pahlawan Seribu Lengkong Gudang Serpong ID - 15130 Tangerang Selatan

Has successfully completed ISO 900:2015 Quality Management System Transfer Surveillance Audit as follow:
The audit has conducted on 7 November 2024

For the scope:
Provision of Estimation Processes

Therefore, the organization will be recommended for award certification.
The original certificate is currently in progress.

This reference letter is given to be used as appropriate. Please do not hesitate to contact us for any further clarification. Thank you.

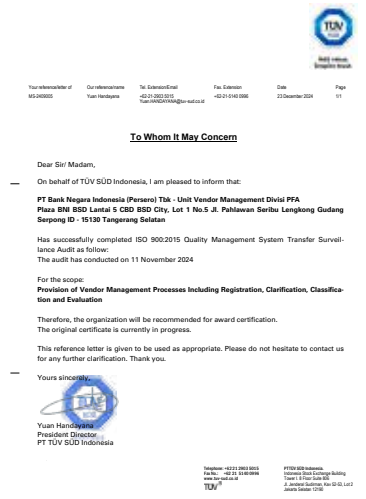
Yours sincerely,

Yuan Handayana
President Director
PT TÜV SÜD Indonesia

To improve the quality of the management of Own Estimate Price (HPS) in accordance with international standards, BNI has successfully obtained ISO 9001:2015 certification in the field of Quality Management System for the management of Own Estimate Price. This certification reflects BNI's commitment to being a reliable service provider for customers, by offering fair and timely prices, and complying with all applicable laws and regulations. BNI also continues to make continuous improvements to improve service quality in accordance with international standards and practices.

In 2024, BNI successfully maintained the second Surveillance Audit for ISO 9001:2015 Quality Management System Certification in the Self Estimate Price (HPS) function.

ISO 9001:2015 Quality Management System in the Vendor Management Section



To Whom It May Concern

Dear Sir/ Madam,

On behalf of TÜV SÜD Indonesia, I am pleased to inform that:

PT Bank Negara Indonesia (Persero) Tbk - Unit Vendor Management Divisi PFA
Plaza BNI BSD Lantai 5 CBD BSD City, Lot 1 No.5 Jl. Pahlawan Seribu Lengkong Gudang Serpong ID - 15130 Tangerang Selatan

Has successfully completed ISO 900:2015 Quality Management System Transfer Surveillance Audit as follow:
The audit has conducted on 11 November 2024

For the scope:
Provision of Vendor Management Processes Including Registration, Clarification, Classification and Evaluation

Therefore, the organization will be recommended for award certification.
The original certificate is currently in progress.

This reference letter is given to be used as appropriate. Please do not hesitate to contact us for any further clarification. Thank you.

Yours sincerely,

Yuan Handayana
President Director
PT TÜV SÜD Indonesia

BNI's commitment to improving the quality of vendor management in accordance with international standards is demonstrated through its ISO 9001:2015 certification for Quality Management Systems in Vendor Management. This certification serves as tangible evidence of BNI's dedication to providing reliable and professional vendor services to ensure the smooth execution of goods and/or services procurement processes. With this certification, BNI not only highlights its ability to recommend high-quality vendors that meet specifications but also affirms that its vendor management processes comply with global quality standards. This instills greater confidence among BNI's business partners and customers that all procurement processes are managed with transparency and high professionalism.

Moreover, BNI consistently conducts evaluations and continuous improvements to enhance the quality of its vendor management services. In 2024, BNI successfully maintained its Surveillance Audit, reaffirming its commitment to upholding high-quality standards in all aspects of vendor management.

This achievement further solidifies BNI's position as a bank that implements best practices in vendor management, ensuring that all procurement processes adhere to international standards and practices to achieve sustainable operational excellence.

PARTNER EVALUATION (DUE DILIGENCE) IN 2024

Each year, BNI performs comprehensive partner evaluations (due diligence) as part of its efforts to ensure that all business partners collaborating with BNI meet the established quality and compliance standards.

The due diligence process involves an in-depth assessment of legal, operational, financial, and experiential aspects. Additionally, BNI conducts checks on the reputational aspects of its partners. BNI ensures that all partners comply with Good Corporate Governance (GCG) principles, sustainability standards, and applicable laws and regulations. By implementing rigorous due diligence, BNI is committed to minimizing operational and reputational risks while ensuring that partners involved in the procurement of goods and services effectively support BNI's strategic objectives.

Company Code Of Ethics [ACGS D.2.1, D.2.2, D.2.3]

BNI has established and implemented a Code of Ethics (Code of Conduct) that explicitly regulates matters related to the value system, business ethics, work ethics, commitment, and enforcement of company regulations in conducting business and other activities. This guideline also clearly outlines permissible and impermissible conduct or interactions between employees, customers, and other stakeholders.

The formulation of BNI's Code of Ethics is consistently based on principles aligned with BNI's vision, mission, and core values, while considering internal regulations and relevant developments. The Code of Ethics serves as a reference for all BNI Hi-Movers in their actions and decision-making, ensuring they work professionally and adhere to the highest ethical standards.

Key Principles of the Code of Ethics [ACGS D.2.1]

All BNI Hi-Movers are required to comply with the 14 (fourteen) key principles of BNI's Code of Ethics as follows:

1. Act professionally, upholding the cultural values of Beliefs and Core Values AKHLAK.
2. Serve as role models and remind subordinates, superiors, colleagues, and partners to adhere to the BNI Code of Ethics.
3. Maintain good relationships among fellow BNI Hi-Movers.
4. Safeguard the confidentiality of bank and position-related information.
5. Ensure workplace security.
6. Protect health, natural resources, and the environment.
7. Record, report, and administer work accurately, honestly, and properly.
8. Prevent conflicts of interest that could harm BNI's interests.
9. Neither give nor accept gifts in any form, directly or indirectly, from any party related to duties and responsibilities.
10. Act as a spokesperson, provided it benefits BNI.
11. Refrain from being members or donors of political parties.
12. Avoid disseminating false information about BNI.
13. Refrain from using BNI's assets for personal interests.
14. Avoid misusing BNI's Corporate Identity for personal gain.

Applicability of the Code of Ethics Across Organizational Levels [ACGS D.2.1 D.2.2]

The Code of Ethics is binding and must be adhered to by all BNI employees, both permanent and non-permanent, across all organizational levels, including the Board of Directors and Board of Commissioners. The commitment of all BNI Hi-Movers to comply with the Code of Ethics in every activity and daily task is formalized in the Integrity Pact, which every BNI employee is required to sign. This written guideline aims to foster awareness among employees to uphold the highest ethical standards, thereby enhancing positive perceptions and strengthening the Bank's reputation among stakeholders.

Code of Ethics Related to Anti-Corruption

[ACGS B.4.5, D.2.1, D.2.2]

BNI is committed to fostering an anti-corruption culture among all employees by creating a conducive, healthy, and corruption-free work environment. This commitment is demonstrated through the establishment of the Gratification Control Unit (UPG), initiated by the signing of the Anti-Gratification Commitment between BNI's President Director and the Chairman of the Corruption Eradication Commission (KPK) on October 17, 2016. This initiative underscores BNI's strong commitment to complying with anti-corruption regulations and ensuring business activities are conducted prudently. The anti-corruption policy contained in the BNI Code of Ethics includes not giving or receiving gifts in any form, directly or indirectly from any party, related to duties and responsibilities.

Code of Ethics Related to Vendors [ACGS D.2.1]

BNI frequently engages third parties to support the smooth operation of the Bank's activities. In line with the application of an anti-corruption culture, BNI ensures that all employees understand and practice sound business ethics as outlined in BNI's Code of Ethics, particularly regarding professional relationships with vendors. Anti-corruption policies concerning vendors, as stipulated in BNI's Code of Ethics, include:

1. Working professionally and independently while maintaining confidentiality to prevent irregularities in procurement processes.
2. Avoiding direct or indirect influence that may result in unhealthy business competition.
3. Accepting and being accountable for decisions made in accordance with written agreements with related parties.
4. Preventing and avoiding conflicts of interest with related parties that could affect fair business competition.
5. Striving to prevent waste and financial leakage of public or corporate funds.
6. Preventing the misuse of authority and collusion practices that could harm the procurement process.
7. Avoiding offering, promising, or accepting gifts, rewards, commissions, rebates, or other forms of compensation related to goods and/or services procurement.

Signing of the Integrity Pact [ACGS D.2.1]

At the beginning of each year, all BNI Hi-Movers at all organizational levels sign an Employee Integrity Pact. This pact contains the code of ethics that all employees must implement as part of their responsibility to perform their duties with transparency and professionalism. The signing of the Integrity Pact aims to ensure a clear understanding of its contents by each individual. It also emphasizes the commitment to reject all forms of corruption, gratification, bribery, and other ethical violations.

In 2024, the Employee Integrity Pact signing was conducted on [date] and achieved full participation, with 100% of employees signing. Through this initiative, BNI seeks to establish a work environment founded on honesty and transparency principles, thereby strengthening good governance across all operational aspects of the Bank.

Dissemination and Socialization of the Code of Ethics [ACGS D.2.1]

To build a corporate culture based on good governance values, BNI consistently communicates and internalizes the core principles of the Code of Ethics to all BNI Hi-Movers, whether based at the Head Office, Regional Offices, or branch offices. The methods used to socialize BNI's Code of Ethics include:

1) Providing the Code of Ethics in a Pocketbook format distributed to all BNI employees.
2) Making the Code of Ethics available as e-learning accessible to all BNI employees.
3) Conducting sharing sessions within each Division/Work Unit at BNI.
4) Using digital internal publication media (DigiHC, BNI Smarter, BNI CorpuTV, BNI Menyapa, Sinergi Magazine, and the BNI Forum website), accessible to all BNI employees at the Head Office, Regional Offices, and Branch Offices, as well as on internal social media accounts and Instagram at @ quickpose.

Efforts to disseminate the Code of Ethics also include conducting regular GCG and Code of Ethics training for all BNI Hi-Movers, whether newly recruited or experienced employees, supplemented by coaching from respective supervisors.

By implementing strict oversight mechanisms to ensure effective application and understanding of the Code of Ethics among all BNI Hi-Movers, BNI has also imposed firm sanctions on employees found to have violated the Code of Ethics. This is intended to deter violators and provide a learning opportunity for others to always comply with BNI's Code of Ethics.

Efforts to Enforce the Code of Ethics through Various Media [ACGS D.2.1, D.2.3]

The implementation and enforcement of the Code of Ethics are integral to the stages of GCG implementation, realized through awareness and internalization programs. BNI is committed to developing and applying GCG principles in all Bank activities across all organizational levels, from the grassroots to top management. Therefore, the Code of Ethics serves as a behavioral reference for the Board of Commissioners, Directors, and employees in achieving the Bank's Vision and Mission.

To uphold the positive values embedded in BNI's Code of Ethics, the Bank conducts regular monitoring towards Code of Ethics compliance and provides a whistleblowing system (WBS) for reporting violations of the Code of Ethics which is regulated separately in BNI's whistleblowing system (WBS). Every employee can report deviations from the Code of Ethics and get a guarantee of protection of the reporter's identity. In order for reports of irregularities to be processed further, each report must be accompanied by accurate data and/or evidence so that the violation can be processed further. Any violation of the Code of Ethics will be subject to sanctions in accordance with applicable regulations and the imposition of sanctions is non-discriminatory.

In addition to relying on the WBS, to facilitate the identification process of violations of the Code of Ethics that occur, BNI also provides internal communication channels as a means of reporting violations of the Code of Ethics, including:

a) Website: http://bni-transparan.tipoffs.com.sg
b) e-Mail: bni-transparan@tipoffs.com.sg
c) Telephone: 021 - 57853377
d) SMS & Whatsapp: 0811-970-1946
e) Mail: BNI Transparan, P.O. BOX 2646, JKP 10026

Compliance with the Code of Ethics reflects the Bank's commitment to adhering to legal regulations and applying the highest ethical standards in all business and operational aspects, regardless of BNI's operational locations. BNI's management must not only follow prevailing laws but also uphold ethical norms and values.

Types and Forms of Sanctions for Violations of the Code of Ethics [ACGS D.2.1]

Employees proven to have violated the Code of Ethics will be subject to strict sanctions according to the severity of their violations. Details regarding the types of violations and the corresponding sanctions are outlined in the following table:

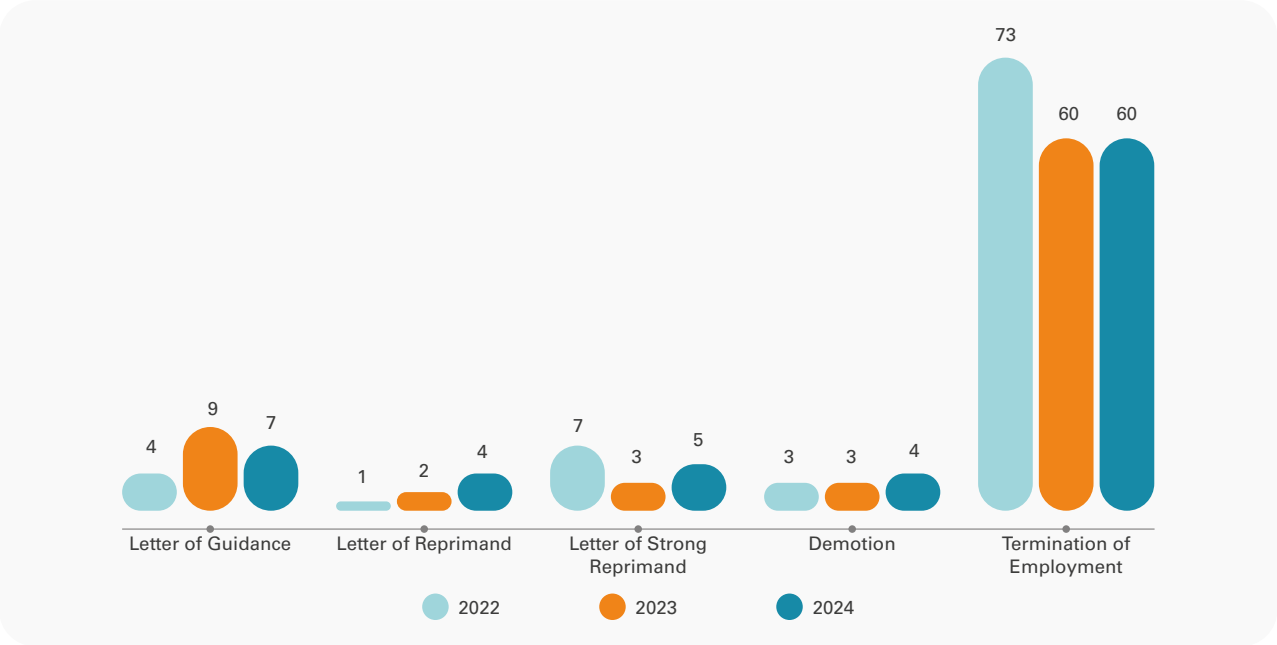
Principal Sanctions	Types of Code of Ethics Violations
Preliminary Guidance Letter	Violations of critical activities are determined as those that have not caused any losses to BNI.
Letter of Guidance (SP)	Violations of rules, policies, procedures, and obligations that do not result in any losses.
Letter of Reprimand (STE)	Violations of rules, policies, procedures, and obligations that result in non-material losses.
Letter of Strong Reprimand (STK)	Violations of policies, procedures, and obligations that result in both material and non-material losses.
Demotion	Violations of policies, procedures, and obligations that cause material losses but do not involve fraud, deception, fictitious activities, manipulation, and/or gratuities.
Termination of Employment (PHK)	Violations of policies, procedures, and obligations that cause intentional material losses and involve elements of manipulation, fraud, and/or fictitious transactions.

Ethics Code Violations and Their Handling in 2024 [ACGS D.2.1]

Throughout 2024, there were 80 violations of the Code of Ethics at BNI. This number is higher than the 77 Code of Ethics violations that occurred in the previous year. Against all violations of the Code of Ethics that occurred in 2024, BNI has taken appropriate measures by providing sanctions, as described in the following table:

Principal Sanctions	2024	2023	2022
Letter of Guidance	7	9	4
Letter of Reprimand	4	2	1
Letter of Strong Reprimand	5	3	7
Demotion	4	3	3
Termination of Employment	60	60	73
Total	**80**	**77**	**88**

Trends in Code of Ethics Violation Sanctions 2022-2024



Corporate Values and Culture

As one of the State-Owned Enterprises (SOEs), BNI upholds the core values of "AKHLAK" as its principal values. AKHLAK, which stands for Amanah (Trustworthy), Kompeten (Competent), Harmonis (Harmonious), Loyal (Loyal), Adaptif (Adaptive), and Kolaboratif (Collaborative), has been established as the corporate culture. These values must be implemented by all BNI Hi-Movers in carrying out their daily duties.

Core Values

Amanah | **K**ompeten | **H**armonis | **L**oyal | **A**daptif | **K**olaboratif

Code of Conduct [ACGS D.2.1]

BNI has established 18 guiding principles of behavior as follows:

1. Fulfill promises and commitments made.
2. Take responsibility for every task, decision, and action undertaken.
3. Uphold moral and ethical values.
4. Enhance personal competence to face ever-evolving challenges.
5. Assist others in learning and developing.
6. Complete duties with the highest quality.
7. Respect every individual regardless of their background.
8. Derive joy from helping others.
9. Foster harmonious and conducive work environment.
10. Safeguard the reputation of colleagues, leaders, the State-Owned Enterprises (SOEs), and the nation.
11. Be willing to make sacrifices for greater objectives.
12. Comply with leadership directives unless they conflict with laws and ethics.
13. Adapt swiftly to improve continuously.
14. Strive for ongoing improvements.
15. Act proactively.
16. Provide opportunities for all parties to contribute.
17. Embrace openness in collaboration to create added value.
18. Mobilize resources effectively to achieve shared goals.

Allocation of Funds for Social and Political Activities

BNI actively contributes to improving community welfare and enhancing environmental conditions through its Social and Environmental Responsibility (TJSL) Program, which is strategically designed to meet the specific needs of beneficiaries, particularly communities around the Bank's operational areas. BNI consistently allocates funds for the implementation of the TJSL Program as part of the Company's long-term commitment and contribution to the environment and society. The budget realized for social activities through the TJSL Program throughout 2024 amounted to IDR129.9 billion.

BNI has a policy that prohibits BNI Hi-Movers from becoming members and/or donors of political parties, as well as from providing funds for political activities throughout 2024 and in previous years.

Provision of Funds for Related Parties and Provision of Large Exposure [ACGS C.4]

BNI has policies and procedures regarding the Legal Lending Limit (LLL), provision of loans to Parties Related to the Bank and a policy that regulates loan limits per industrial sector, along with monitoring and settlement. BNI periodically holds meetings of the Credit Procedures Committee and Credit Policy Committee as well as Board of Directors meetings to discuss matters related to policies, procedures, and operational implementation in the loan sector in order to minimize loan risk.

In accordance with POJK concerning the Implementation of Commercial Bank Governance, BNI always applies the principle of prudence in providing funds to related parties and providing large exposures at least by implementing the distribution or diversification of the portfolio of funds provided. The policy for disclosing the provision of funds to related parties (individuals or groups, including the Board of Directors, Board of Commissioners, Bank Executive Officers, and other related parties) and the provision of large exposure refers to SE OJK No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks on Transparency in the Implementation of Governance section.

To ensure that the provision of funds to related parties and in large amounts is in accordance with the prudent principle, BNI has implemented an adequate internal control system as follows:

1. Establish clear policies and procedures at each stage of the loan granting process;
2. Provision of funds to related parties must obtain approval from the Board of Commissioners.
3. The provision of funds above a certain nominal amount is consulted with the Board of Commissioners.
4. Internal Audit carries out checks based on risk assessment to ensure the adequacy of risk management and internal control, including in the loan granting process.

In providing funding approval to related parties or large exposures, BNI focuses on the following:

1. Management pays special attention to providing large amounts of loans, which includes providing funds to debtors using various risk measurement systems. This system includes the Internal Rating System (for corporations, commercial businesses, and small businesses), Loan Portfolio Management, and Loan Exposure Limit (based on segment, economic sector, and region), as well as the Legal Lending Limit (LLL), which is regulated through the Internal House Limit and Country Exposure Limit.
2. Capital and Capital Adequacy Ratio (CAR) reporting is carried out periodically to management and all related units to serve as a guideline in carrying out business activities, especially in the provision of funds.

POLICY ON PROVISION OF FUNDS TO RELATED PARTIES [ACGS C.4.1]

In providing approval for the provision of funds to related parties, BNI always pays attention to internal provisions and OJK regulations as well as applicable laws and regulations, including aspects of the Legal Lending Limit (LLL). The Bank always prioritizes prudential banking principles in channeling funding to related parties and also to debtors by carrying out a tiered review process and implementing mechanisms that apply internally at BNI.

For material transactions with related parties and transactions that have the potential to cause a conflict of interest for the Bank, approval from the Board of Commissioners must be based on recommendations from the Audit Committee given before carrying out material transactions with affiliated parties. These transactions must be submitted to the OJK and submitted as part of the Bank's information disclosure to the public in accordance with the provisions of POJK No. 42/POJK.04/2020 concerning Affiliate Transactions and Conflicts of Interest and POJK No. 17/POJK.04/2020 concerning Material Transactions and Changes in Business Activities.

In 2024, BNI did not carry out material transactions with affiliated parties that contain conflicts of interest. [ACGS A.8.1]

POLICY ON PROVISION OF LARGE EXPOSURE

Provision of large exposures is the nominal provision of funds to 1 (one) borrower or 1 (one) group of borrowers other than Related Parties amounting to 10% or more of the core capital (Tier 1) of the Bank. The provision of large exposures must be analyzed for feasibility, at least the same or more prudent than the provision of funds to general debtors. The terms and conditions for providing funds are applied in accordance with the loan provisions and procedures applicable at BNI.

In 2024, there were no violations or exceedances of the LLL in the provision of large exposures to parties related to the Bank. In detail, information regarding the provision of funds to related parties, namely regarding the nature of the relationship, nature of transactions, and transaction value during 2024, has been disclosed in the Notes to the Consolidated Financial Statements, which are part of this Annual Report.

REPORTING AND DISCLOSURE

BNI submits LLL reports regularly and on time to the OJK or Bank Indonesia. Information regarding the Provision of Funds to Related Parties and to Individual and Group Core Debtors (Large Exposure) at BNI during 2024, is as follows:

Provision of Funds	2024		2023	
	Number of Debtors	Nominal Amount (IDR million)	Number of Debtors	Nominal Amount (IDR million)
To Related Parties	341	2,191,892	319	1,837,129
To Debtors:	20	237,908,427	20	213,772,386
a) Individuals	2	27,407,091	2	24,748,306
b) Group	18	210,501,336	18	189,024,080

Provision of Credit to Related Parties

As part of BNI's commitment to implementing responsible banking practices, the Bank has established measurable policies in terms of providing credit to related parties by referring to the provisions of POJK No. 32/POJK.03/2018 ("POJK 32/2018") concerning the Legal Lending Limit for Providing Credit and Providing Large Funds for Commercial Banks as amended by POJK No. 38/POJK.03/2019 Article 5, which states that the entire portfolio of Provision of Funds to Parties Related to the Bank is set at a maximum of 10% (ten percent) of the Bank's Capital. A maximum limit of 10% is imposed to manage risk exposure and maintain the Bank's financial stability. Meanwhile, the definition of Provision of Funds includes the activity of investing Bank funds in the form of, among other things, credit, securities, placements, claims on securities purchased with an agreement to resell (reverse repo), and others.

The policy regarding Providing Credit to Related Parties at BNI is contained in Company Guidelines No. IN/640/PGV/010 dated December 16, 2024. This policy stipulates that Banks are prohibited from providing Fund Provisions (hereinafter referred to as "Providing Credit") to Related Parties without approval from the Board of Commissioners and does not conflict with general Fund Provision procedures. In addition, the provision of credit to prospective debtors who have familial relationships or have a conflict of interest with credit processors and/or decision makers has also been regulated in Company Guidelines No. IN/102/PGV/002 dated March12, 2018. Related Parties as regulated in POJK No. 32/POJK.03/2018 dated December 27, 2018 as amended by POJK No. 38/POJK.03/2019 dated December 19, 2019, include:

a. Individuals or companies who control the Bank.
b. Legal entity in the case where the Bank acts as controller.
c. The company, in the case of an individual or company as intended in letter a, acts as the controller.
d. Members of the Board of Directors, Members of the Board of Commissioners, and Bank Executive Officers; what is meant by Executive Officer is an official who is directly responsible to the Board of Directors or has a significant influence on the Bank's policies and/or operations, namely division heads, regional office heads, branch office heads, functional office heads whose positions are at least equivalent to branch office heads, heads of risk management work units, compliance work unit heads, and internal audit work unit heads, and/or other equivalent officials.
e. Parties who have horizontal or vertical familial relationships:
   1) From individuals who control the Bank as referred to in letter a; and
   2) From members of the Board of Directors and/or members of the Board of Commissioners at the Bank as referred to in letter d.

   Horizontal or vertical family relationships, namely:
   - biological/step/adoptive parents;
   - biological/step/adopted siblings;
   - biological/step/adopted children;
   - biological/step/adoptive grandfather or grandmother;
   - biological/step/adopted grandchildren;
   - biological/step/adopted siblings of parents;
   - husband or wife;
   - parents in law;
   - husband or wife of biological/step/adopted children;
   - husband's or wife's grandfather or grandmother;
   - husband or wife of biological/step/adopted grandchildren; or
   - biological/step/adopted siblings of the husband or wife along with the husband or wife of the sibling concerned.
f. Members of the Board of Directors and/or members of the Board of Commissioners, in the company as referred to in letters a, b, and/or c.
g. Companies whose members of the Board of Directors and/or members of the Board of Commissioners are members of the Board of Commissioners of the Bank.
h. Companies/entities that have 50% (fifty percent) or more members of the Board of Directors and/or members of the Board of Commissioners and are Directors and/or Commissioners of the company as intended in letters a, b, and/or c.

i. Company/entity where:
   1) Members of the Board of Directors, members of the Board of Commissioners, and/or Bank Executive Officers as referred to in letter d act as controller; and
   2) Members of the Board of Directors and/or members of the Board of Commissioners from the parties as intended in letters a, b, and/or c act as controllers.
j. Collective investment contract in which the Bank and/or the parties referred to in letter a up to letter i own 10% (ten percent) or more shares in the Investment Manager of the collective investment contract.
k. Companies that have financial relationships with Banks and/or parties as intended in letter a up to the letter i; Financial relationships are analyzed from several factors, namely:
   1) there is financial assistance from the Bank and/or Related Parties or financial assistance to the Bank and/or other Related Parties with conditions that cause the party providing financial assistance to have the ability to determine (controlling influence) the strategic policies of the company receiving financial assistance;
   2) there is a significant business chain linkage in the Bank's or Related Party's business operations with other companies so that there is dependency between one party and another, which results in:
      - one party is unable to easily transfer business transactions to another party; and
      - the inability to easily transfer business transactions causes the cash flow of one of the parties to experience significant disruption, resulting in difficulties in fulfilling obligations; and/or
   3) there is a transfer of credit risk through guarantees where the guaranteeing party will take over part or all of the financial risk from the guaranteed party.
l. The borrower is in the form of an individual or non-bank company that has a financial relationship through the provision of guarantees to parties as intended in letters a to letter k.
m. The borrower has a financial relationship through guarantees provided by the parties as intended in letters a to letter k.
n. Other banks that have financial relationships through providing guarantees to parties as intended in letters a to letter k in the event that there is a counter guarantee from the Bank and/or parties as intended in letters a to letter k to the other bank.
o. Other companies in which there is an interest in the form of share ownership of 10% (ten percent) or more, individually or jointly, of the parties as intended in letter e.

Provision of credit to a debtor who is not a Related Party, but is used for the benefit of the Related Party, is categorized as Providing Credit to a Related Party. In this case, BNI is committed to managing the provision of credit to related parties by applying the principle of prudence and ensuring that the ratio of providing funds remains in accordance with applicable regulations. In addition, BNI implements strict internal supervision at every stage of the credit granting process to Related Parties. This step is taken to ensure that the entire process runs transparently, measurably, and in accordance with established rules. This policy also aims to prevent potential conflicts of interest and maintain the financial integrity of the Bank.

Protection of Creditors' Rights [ACGS B.4.6]

BNI is committed to protecting creditors' rights through implementing an honest, transparent, and fair information disclosure system. By upholding the principle of equality (equal treatment), BNI ensures that all creditors and business partners can obtain relevant information according to their needs so that each party can make objective decisions based on fair, reasonable, and accurate considerations.

In addition to ensuring the availability of transparent information for all parties, BNI also guarantees the fulfillment of creditors' rights in accordance with mutually agreed agreements. The bank ensures that obligations to creditors are fulfilled on time and avoids delays or negligence, which could potentially cause losses for both parties. This is in line with one of the Governance principles published by the ASEAN Corporate Governance Scorecard. [ACGS B.4.6]

Transparency of The Bank's Financial and Non-Financial Conditions

BNI is committed to maintaining consistency and improving the quality of corporate governance, particularly in enforcing the principle of transparency by ensuring the Bank's compliance with its obligations for transparency and publication of both financial and non-financial conditions to stakeholders, in accordance with applicable regulations. The delivery and publication of this information are carried out through both printed media and BNI's website, which can be accessed at: https://www.bni.co.id/id-id/.

Additionally, BNI has established policies and procedures on how to implement transparency of financial and non-financial conditions in accordance with the following regulations: POJK No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports; POJK No. 29/POJK.04/2016 on the Annual Reports of Issuers or Public Companies; and SE OJK NO 16/SEOJK.04/2021 on the Form and Content of the Annual Report of Issuers or Public Companies.

TRANSPARENCY OF FINANCIAL CONDITION

Throughout 2024, BNI has compiled and submitted monthly, quarterly, and annual financial reports to the relevant regulators (OJK, Indonesia Stock Exchange, and the Ministry of State-Owned Enterprises) in a timely, complete, accurate, and comprehensive manner. The preparation and presentation of BNI's financial reports are in accordance with the procedures, types, and scope as outlined in the regulations. In addition to submitting monthly and quarterly financial reports, BNI also submits the Annual Report to regulators, rating agencies, banking development institutions, research institutions, and periodically submits reports in compliance with capital market regulations. Information regarding the Bank's financial transparency is published through OJK's reporting system, BNI's website, and the Indonesia Stock Exchange (IDX).

TRANSPARENCY OF NON-FINANCIAL CONDITION

BNI also ensures the openness of information regarding the Bank's non-financial conditions, which includes developments in corporate governance, vision, mission, and the composition and profile of the management team.This information is published through the Annual Report, the Bank's official website, and various other media that can be easily accessed by customers and the general public.

In 2024, BNI has compiled and presented reports related to the transparency of the Bank's non-financial conditions, taking into account the procedures, types, and scope as regulated by applicable POJK regulations, and has provided and published additional information concerning non-financial conditions, including the following:

1. Disclosure of Corporate Governance Information, including the Corporate Governance Annual Report, Vision, Mission, Company Values, Code of Ethics, Composition and Profile of the Board of Commissioners and Board of Directors, as well as internal governance regulations from the Articles of Association to the Corporate Charter, which are also published through BNI's website;
2. Information on the Company's Products and Services, including its branch network, published through the Annual Report and BNI's website, to enable customers, investors, and the general public to easily access information on BNI's products and services;
3. Information on Complaint Submission Procedures, Safe Banking Tips for Customers to maintain data privacy while using banking services, published through BNI's website to comply with consumer protection regulations; and
4. Other Information aimed at supporting information transparency, financial education, and services to the community.

Transparency in Customer Complaint Procedures and Dispute Resolution

BNI is committed to providing transparent and responsive services in handling customer complaints and dispute resolution. The bank has clear procedures in place that are easily accessible to customers for submitting complaints or grievances related to services, products, or banking transactions. Information regarding the complaint process can be accessed through various communication channels, such as BNI's official website, the banking application, the Customer Experience Center, and BNI branch offices.

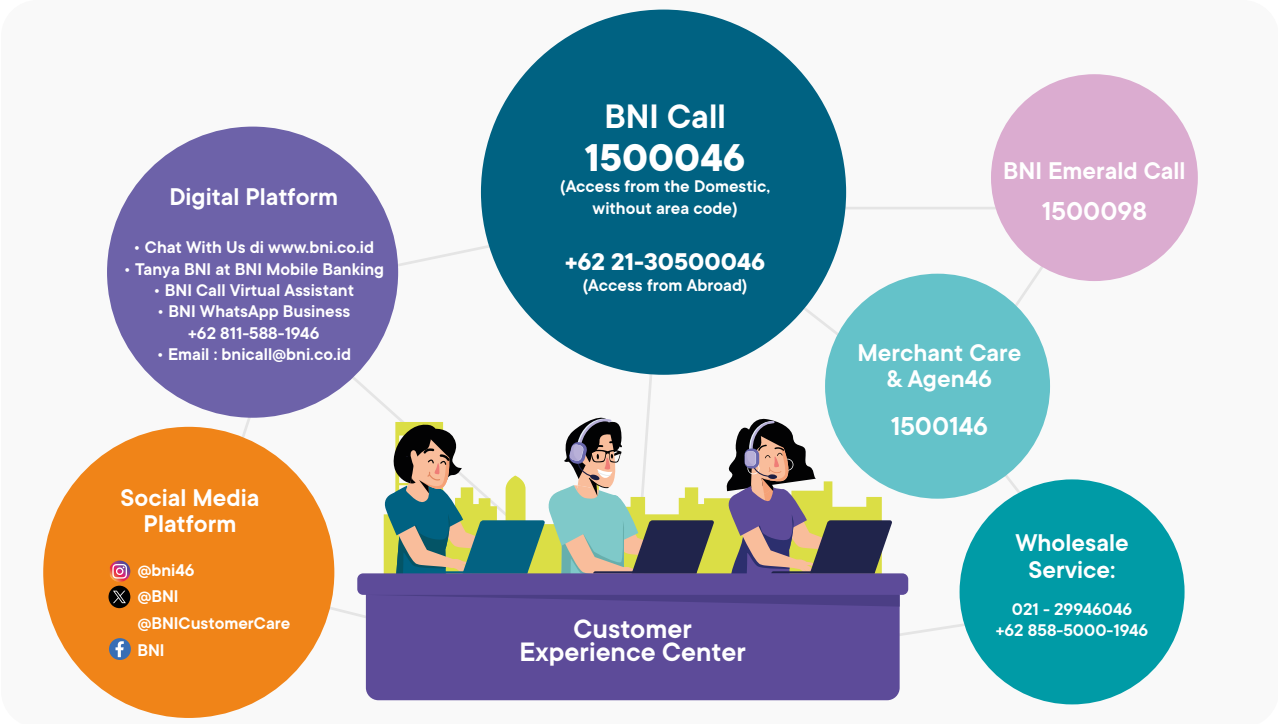
Each complaint received is the shared responsibility of the relevant units and is handled professionally and transparently, in accordance with the applicable Service Level Agreement (SLA) standards. BNI strives to resolve each complaint in a timely manner, offering fair and adequate solutions for both parties. In the case of a dispute requiring further resolution, BNI provides a dispute resolution mechanism that prioritizes internal mediation, and when necessary, can involve a third party in accordance with applicable regulations.

EASE OF ACCESS TO SERVICES

Customer Experience Center as a BNI Touchpoint

In an effort to maintain transparency and enhance service quality, BNI fully welcomes all complaints, criticisms, and feedback from customers. Through the Customer Experience Center, one of BNI's key touchpoints, the bank strives to deliver the best service 24 hours a day, 7 days a week, ensuring speed and ease for customers to obtain information, conduct transactions, and find solutions to any issues they may face.

All BNI customers can submit their complaints or grievances through:



Additionally, customers can submit their complaints or grievances through BNI branch offices located across Indonesia.

ISO 9001:2015 Certification

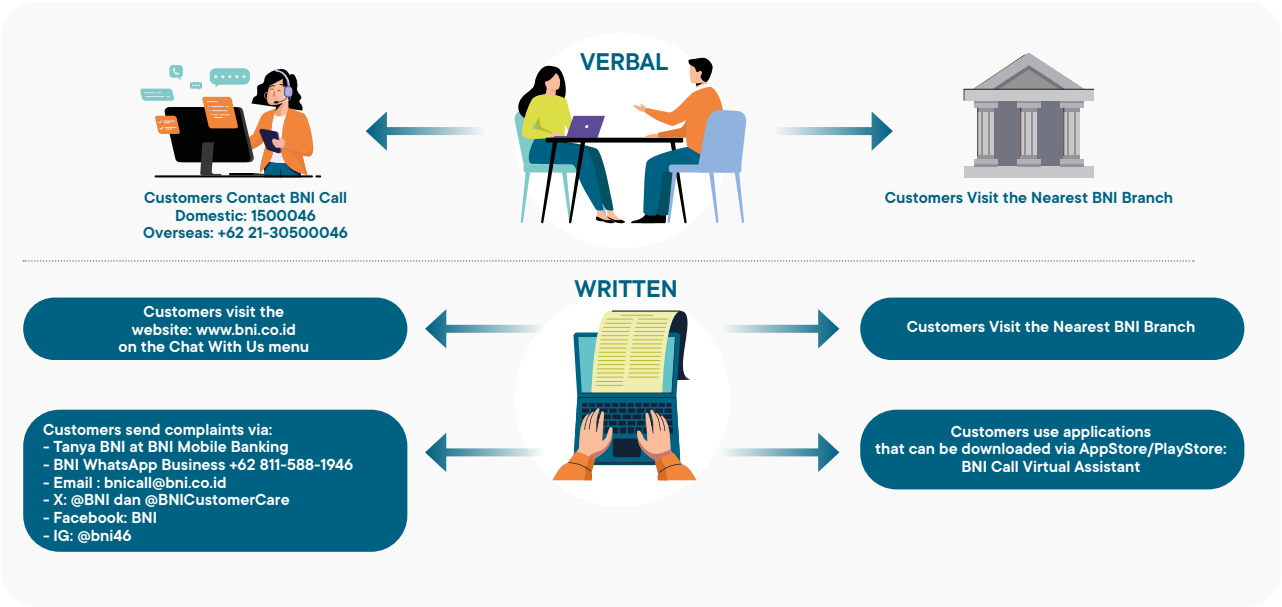
The Customer Experience Center has been awarded ISO 9001:2015 certification for service quality standards and regularly renews this certification every three years. The acquisition of this internationally recognized certification reflects BNI's commitment to maintaining high-quality service for its customers.

BNI CUSTOMER COMPLAINT HANDLING AND RESOLUTION PROCEDURES

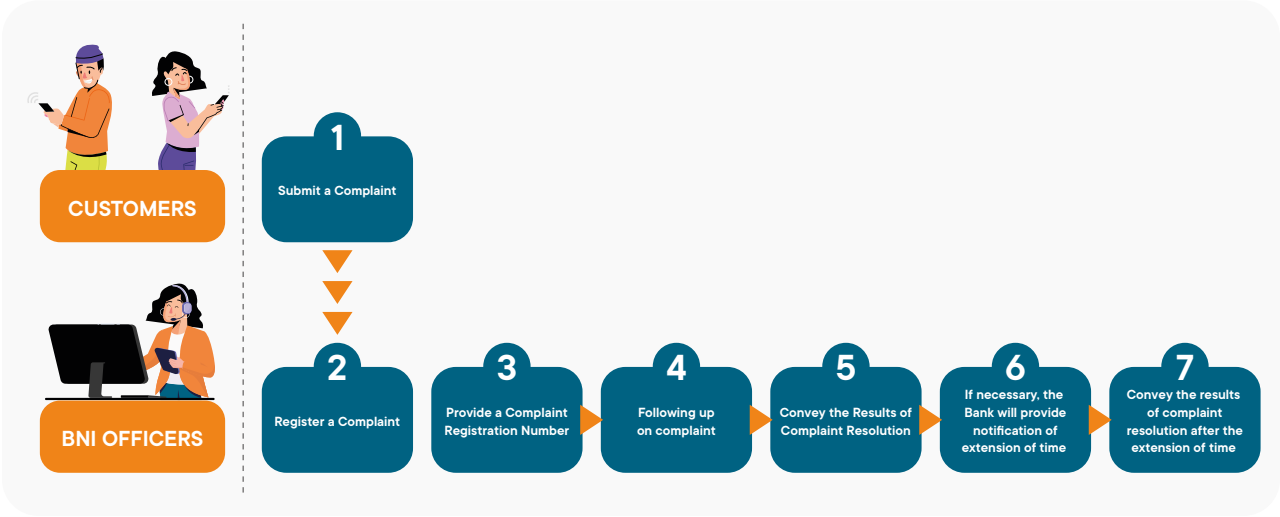
As the entity responsible for managing customer complaints, the Customer Experience Center is responsive and proactive in following up on all complaints and strives to resolve them in accordance with the applicable Service Level Agreement (SLA). The complaint handling services cover various aspects, including banking, credit cards, merchants, trade and remittance, and wholesale services. Customers are provided with easy access to the complaint services through various media, whether verbal or written.

BNI Customer Complaint Submission Mechanism

BNI is committed to finding the best solution for every complaint or grievance submitted by customers as part of its efforts to maintain a superior customer experience. As outlined in POJK No. 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, the Customer Experience Center is committed to providing resolution for complaints submitted verbally within a maximum of five (5) working days from the time the complaint is received. For written complaints, the resolution time is a maximum of ten (10) working days from the receipt of the complete document, with a possible extension of an additional ten (10) working days. Information regarding the extension of the complaint resolution period is communicated to customers via SMS, phone, email, letter, or WhatsApp.



Flow of Complaint Submission and Resolution



In the event that the customer is dissatisfied with the settlement solution provided, BNI provides the opportunity for the customer to continue the complaint settlement process through the Alternative Dispute Resolution Institution (LAPS) contained in the List of Alternative Dispute Resolution Institutions established by the Financial Services Authority (OJK). The Financial Services Sector LAPS is an institution tasked with resolving disputes between customers and banks outside the court. This settlement process is in accordance with the provisions contained in Article 82 POJK No. 22 of 2023.

Integrity of Reporting and Information Technology Systems

The integrity of reporting and information technology systems serves as a cornerstone of BNI's success in achieving transparency in financial and non-financial conditions for stakeholders. By committing to the preparation of reports in accordance with Financial Services Authority (OJK) Regulations, BNI ensures that the information provided is accurate, comprehensive, and undistorted, thereby instilling confidence in stakeholders regarding the reliability of the information they receive.

BNI's reporting system encompasses 2 (two) types of reports, namely Regulatory Reports (RR) and Non-Regulatory Reports (NRR). The Non-Regulatory Report is integrated into a unified platform in the form of a dashboard, supported by a single source of truth within Big Data. For Regulatory Reports, the system is also supported by Big Data and Master Data Management (MDM).

To promote transparency, BNI prioritizes openness in its products and the use of customer data in compliance with applicable regulations. Financial and sustainability reports are prepared in an integrated manner, covering historical performance, as well as analyses of risks, opportunities, and future prospects. A reliable and secure information technology system plays a crucial role in ensuring the availability and accessibility of data efficiently while safeguarding data integrity against various threats.

In compliance with the requirements of Article 100 of OJK Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks, BNI ensures the availability and adequacy of internal reporting supported by a robust management information system to enhance the quality of decision-making processes by the Board of Directors and the quality of oversight processes by the Board of Commissioners. Furthermore, in the implementation of information technology, BNI adheres to OJK Regulation No. 11/POJK.03/2022 on the Implementation of Information Technology by Commercial Banks.

Compliance with these regulations not only preserves the integrity of reporting but also bolsters stakeholder trust. Adequate internal reporting contributes to better decision-making and more effective oversight.

In addition, the Board of Directors is committed to developing technological infrastructure and digital innovation to support the achievement of the company's vision, mission, objectives, and both short-term and long-term plans. By aligning with stakeholder expectations, innovation remains central to strategy and operational oversight. The Board also promotes continuous innovation, including the development of new business models, products, services, and strategic partnerships

Insider Trading and Conflict of Interest Policy [ACGS C.5.1, B.A.6]

BNI has strict policies regarding insider trading and conflicts of interest to ensure integrity and transparency in all banking activities. This policy aims to prevent and manage the use of inside information and potential conflicts of interest that may influence business decisions. BNI emphasizes the strict prohibition against the use of material information that has not been published in private transactions by all BNI Hi-Movers, from employees and members of the Board of Directors to the Board of Commissioners, and requires reporting of situations that have the potential to give rise to conflicts of interest.

Guidelines regarding insider trading have been set out in Company Guidelines for Prohibited and Unprohibited Securities Transactions for Insiders No. IN/500/KMP/001 dated September 23, 2019, which regulates in detail the prohibition on the use of inside information for personal gain directly or indirectly from information that is not or is not yet available on the market. Meanwhile, policies for handling conflicts of interest are regulated in the Company Guidelines for Handling Conflicts of Interest No. IN/119/CMP/001 dated December 27, 2024. These two guidelines are designed to ensure that all business actions and decisions are free from personal influence or conflicts of interest that are detrimental to the Bank. In addition, the Bank also continually reminds all Divisions and Units regarding the Bank's obligations as a Public Company regarding Disclosure of Information or Material Facts, Affiliate Transactions and Conflict of Interest Transactions on a regular basis. [ACGS C.5.1, B.A.6]

In order to prevent conflicts of interest, all BNI Hi-Movers are required to do the following things:

1. Prioritize the Bank's Interests.
   a. Serve all Bank stakeholders in accordance with their respective duties and responsibilities.
   b. Carrying out duties based on applicable regulations and policies, without prioritizing personal interests or those of affiliated parties, including religion, profession, political party, or ethnicity, and avoiding matters that could give rise to a conflict of interest.
   c. It is prohibited to include personal interests in decision making or actions that can influence the quality of the decisions or actions.
   d. Do not give preferential treatment to certain parties by ignoring applicable procedures or provisions.
   e. Not seek or receive undue benefits that could affect the performance of duties.
   f. If a conflict of interest occurs, BNI Hi-Movers is obliged to prioritize the Bank's economic interests and prevent the Bank from losses or potential reduction in profits.
2. Creating Openness in Handling Conflicts of Interest
   a. Openness is needed so that conflicts of interest can be controlled and handled appropriately.
   b. BNI Hi-Movers who face a conflict of interest situation are required to disclose any personal interests or affiliate relationships that have the potential to give rise to a conflict of interest.
3. Encourage Personal Responsibility and Modeling
   a. BNI Hi-Movers must maintain credibility and integrity to be a role model for others.
   b. Separate personal affairs from Bank affairs to avoid conflicts of interest that could harm or reduce Bank profits.
   c. BNI Hi-Movers are required to make an annual statement regarding conflicts of interest and strive to avoid all forms of potential conflicts of interest in carrying out their duties.
4. Creating an Anti-Conflict of Interest Culture
   a. Banks are required to submit an annual statement to the public regarding the prohibition on BNI Hi-Movers accepting gifts or gifts from customers, work partners, vendors, and other parties.
   b. Socialization regarding conflicts of interest must be carried out continuously to increase awareness and build an anti-conflict of interest culture, as well as encourage BNI Hi-Movers to proactively report indications of conflicts of interest through internal complaint channels.

5. Enforcing the Conflict of Interest Policy
   BNI Hi-Movers who are proven to have violated provisions relating to conflicts of interest will be subject to sanctions in accordance with the provisions in force at the Bank.

Policies and procedures regarding conflicts of interest have been determined, understood, and implemented by the Board of Directors, Board of Commissioners, management, employees, and other related parties. From 2022 to 2024, there were no violations of the insider trading policy and conflicts of interest involving the Board of Directors, Board of Commissioners, management, and employees. This shows BNI's commitment to carrying out operations with high ethical standards and complying with all applicable regulations. In addition, there have been no cases of non-compliance with laws, regulations, and provisions relating to material transactions with related parties in the last three years.

Share and Bond Buyback

From March 2023 to September 2024, BNI has completed the buyback of 40,514,600 shares, equivalent to IDR179,959,897,500 (One hundred seventy-nine billion nine hundred fifty-nine million eight hundred ninety-seven thousand five hundred rupiahs).

The buyback program is in accordance with the provisions stipulated in the Financial Services Authority Regulation No. 30/POJK.04/2017 regarding Buyback of Shares Issued by Public Companies ("POJK 30/2017").

In accordance with the provisions set forth in Article 8 of POJK 30/2017, the buyback must be completed no later than 18 (eighteen) months from the date of the AGM that approved the buyback. Therefore, BNI was required to complete the share buyback within 18 (eighteen) months from the decision of the Annual General Meeting of the 2022 Financial Year, held on March 15, 2023, with the final completion deadline being September 15, 2024.

Buyback Timeline



The implementation of the buyback and the transfer of shares resulting from the buyback into the employee stock ownership program and the stock ownership program for the Board of Directors and the Board of Commissioners have been carried out in accordance with the applicable regulations and represent an application of performance-based remuneration. This has not diminished investor confidence in BNI. This is reflected in the preservation of BNI's stock valuation, with the price-to-book value (PBV) increasing from 1.20 times on March 15, 2023, when BNI received approval for the buyback at the Annual General Meeting, to 1.40 times on September 13, 2024. During the same period, BNI's share price rose from IDR4,400 per share to IDR5,625 per share.

BNI also ensures that the buyback does not affect the bank's business activities or its growth. This is because BNI possesses sufficient capital and cash flow to conduct all its business activities, including business development, as well as the buyback.

Internal Fraud [ACGS C.5.1]

Every organization, including BNI, is vulnerable to the risk of fraud arising from within. Internal fraud at BNI refers to deliberate acts or omissions aimed at deceiving, misleading, or manipulating the Bank, its customers, or other parties, occurring within the Bank's environment and/or using the Bank's resources, resulting in losses to the Bank, customers, or other parties, or direct/indirect benefits to the perpetrators or others. Such fraudulent actions relate to BNI's operational processes and business activities and can directly impact the Bank's financial condition. These actions may include data manipulation, asset theft, fraud, information leakage, or misuse of the Bank's resources.

Anti-Fraud Policy

To foster a culture of compliance and raise awareness of potential fraud risks across the organization, BNI has implemented an anti-fraud framework as part of its internal control system. BNI's Anti-Fraud Policy adheres to the Financial Services Authority Regulation (POJK) No. 12 of 2024 ("POJK 12/2024") on the Implementation of Anti-Fraud Strategies for Financial Service Institutions. BNI's management is committed to strictly addressing all violations or fraudulent acts, including criminal prosecution of employees involved. This commitment aligns with the "Tone from the Top" principle, reflecting BNI's firm stance and dedication to the Zero Tolerance to Fraud policy. To maintain and enhance awareness and understanding of its Anti-Fraud Strategy, BNI conducts education, competency development, and regular dissemination of the policy.

BNI is committed to cultivating a robust anti-fraud culture throughout the organization as part of its efforts to uphold integrity and trust in banking operations. The anti-fraud policies and strategies are consistently applied through the principle of "No Fraud for Our Bank," emphasizing prevention and early detection of fraudulent activities. To ensure the effectiveness of these policies, the Compliance Division has developed a Compliance Index (CIX) to evaluate and monitor adherence to and success in anti-fraud initiatives across BNI comprehensively.

Types of Fraudulent Activities

Referring to POJK 12/2024, BNI categorizes the following activities as fraud:

1. Corruption, including:
   a. Conflicts of interest detrimental to the Bank and/or customers;
   b. Bribery;
   c. Unauthorized acceptance;
   d. Extortion.
2. Asset Misuse, including:
   a. Misappropriation of cash;
   b. Misappropriation of inventory;
   c. Misappropriation of other assets.
3. Financial Statement Fraud, including:
   a. Overstating net assets and/or income;
   b. Understating net assets and/or income.
4. Fraudulent activities;
5. Leakage of confidential information; and/or [ACGS C.5.1]
6. Other actions equivalent to fraud under applicable laws and regulations.

Active Oversight of Fraud by the Management

BNI's management actively supervises the implementation of Anti-Fraud Policies across all organizational levels. In 2024, this oversight includes periodic evaluations of systems and procedures to ensure compliance with established policies. Concrete forms of active supervision include more frequent and thorough internal audits and leveraging analytic technology for real-time transaction monitoring and fraud detection. Additionally, BNI conducts fraud risk and good governance training programs for management and employees to ensure all parties understand the importance of adherence to anti-fraud policies.

As part of its commitment to good governance, all BNI personnel, including the Board of Directors and the Board of Commissioners, have signed an Integrity Pact, demonstrating compliance with POJK No. 12/2024. This Integrity Pact includes a pledge to uphold integrity, reject all forms of fraud, bribery, and corruption, and adhere to BNI's Code of Ethics and Conduct.

Furthermore, BNI emphasizes its anti-fraud policy, commitment to integrity, and whistleblowing mechanism to business partners in every engagement. Fraud prevention efforts are reinforced by encouraging all business partners to refrain from offering gratuities. This approach minimizes risks of fraud, bribery, and corruption while maintaining the trust of business partners in BNI.

Anti-Fraud Awareness Program

BNI continuously implements mitigation measures to prevent employee misconduct (fraud) through ongoing anti-fraud awareness campaigns targeted at all BNI Hi-Movers, customers, debtors, business partners, and vendors. These campaigns employ various methods and media, including face-to-face sessions, virtual platforms, e-learning modules, and internal communication tools such as email blasts, internal bulletins, desktop wallpapers, and posters. This comprehensive approach ensures that all organizational layers, as well as external stakeholders, understand their responsibilities in preventing fraud.

In 2024, BNI organized anti-fraud awareness and campaign programs for not only BNI Hi-Movers but also customers, debtors, business partners, and vendors. These programs aim to enhance awareness and understanding of the importance of integrity and adherence to established policies. By engaging all stakeholders, BNI seeks to foster a culture of transparency and accountability, preventing violations and strengthening trust among its stakeholders.

Internal Fraud Data (2022–2024)

The table below provides a detailed breakdown of internal fraud incidents at BNI from 2022 to 2024:

Internal Fraud	Number of Cases Committed by								
	Members of the Board of Directors and Board of Commissioners			Permanent Employees			Non-permanent Employees and Labor Outsourcing		
	2024	2023	2022	2024	2023	2022	2024	2023	2022
Total Fraud	0	0	0	14	11	14	2	0	7
Resolved	0	0	0	9	9	10	2	0	2
In the Process of Settlement within the Bank	0	0	0	5	2	4	0	0	5
Not yet Resolved	0	0	0	0	0	0	0	0	0
Followed up by Legal Process	0	0	0	5	3	2	0	0	1

Description: Loss > 100 Million
*number of cases position as of December 2024

Regarding the internal fraud incidents reported during 2024, BNI has imposed strict sanctions, including the termination of employment (PHK) for the employees directly involved as primary perpetrators and administrative penalties have also been applied in accordance with the severity of the wrongdoing to the personnel involved.

Long-Term Performance-Based Compensation Policy [ACGS: B.6.3]

BNI applies a long-term performance-based compensation policy as a form of appreciation for management and employees who have made significant contributions. This long-term performance-based compensation is implemented to ensure the sustainable performance of the company. The compensation program is realized through a share ownership scheme, which consists of the Management Stock Ownership Program (MSOP) and the Employee Stock Ownership Program (ESOP). Through this policy, BNI aims to encourage continuous performance improvement and create alignment between the Bank's goals and employee interests. [ACGS B.6.3]

Share Ownership Program Policy by the Board of Directors and Non-Independent Commissioners

The Long-Term Compensation Policy for members of the Board of Directors and Non Independent members of the Board of Commissioners in the form of the Management Stock Ownership Program follows the provisions of OJK Regulation No. 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks ("POJK No. 45/2015") and the Ministry of SOE Regulation No. PER-3/MBU/03/2023 concerning the Organization and Human Resources of State-Owned Enterprises ("Permen BUMN No. 3/2023").

Referring to POJK No. 45/2015, articles 17 and 18, Variable Remuneration provided by BNI, which has been a publicly listed company (go public), must be in the form of shares or share-based instruments issued by BNI (stock code: BBNI), representing a certain percentage of the Variable Remuneration. Meanwhile, Variable Remuneration in the form of shares or share-based instruments for Independent Commissioners may be converted and provided in cash.

Variable Remuneration provided in the form of shares for members of the Board of Directors and non-independent members of the Board of Commissioners is given in the form of Deferred Bonuses. Ministry of SOE Regulation No. 3/2023, article 107, states that SOEs must defer the payment of bonuses to the Board of Directors and Board of Commissioners by a certain percentage determined by the Minister, at a minimum of 10%. The deferral period for payment must be at least 3 years. Deferred bonuses must be paid pro rata in accordance with the deferral period. SOEs may delay the payment of part or all of the deferred bonuses (malus) or reclaim any cash bonuses that have been paid (clawback) to the Board of Directors and Board of Commissioners under certain conditions set by the Minister.

The long-term compensation policy for members of the Board of Directors and Independent Commissioners is designed to prioritize prudence in managing the bank. This policy aims to reduce the risk of excessive risk-taking by decision-makers and supports the implementation of a performance-based remuneration system.

Eligibility Requirements for the Board of Directors and the Board of Commissioners

BNI may provide bonuses or performance incentives to members of the Board of Directors and Board of Commissioners based on the General Meeting of Shareholders› approval of the annual report if:

a. The auditor's opinion is Unqualified (WTP);
b. The realized health level is at least BBB without considering losses/profits due to the prior actions of BNI's Board of Directors and/or outside their control;
c. The KPI achievement is at least 80%, excluding factors outside the control of BNI's Board of Directors; and
d. BNI is not in a worse financial condition than the previous year if BNI is in a loss, or BNI does not turn from profit to loss, excluding factors outside the control of BNI's Board of Directors.

These requirements are consistent with the provisions set forth in Ministry of SOE Regulation No. 3/2023, article 102.

Provision of Deferred Bonuses in the Form of Shares

The following table presents detailed information regarding the Deferred Tantiem in the Form of Shares to Non-Independent Members of the Board of Directors and Board of Commissioners of BNI:

Date of GMS	Date of Provision of Deferred Bonuses	Total Number of Shares*	Duration Exercise	Price (average price per share)	Vesting Period	Policy
March 20, 2018	June 28, 2019	1,444,546	3 years	IDR8,275	June 5, 2019 June 5, 2020 June 5, 2021	Malus
May 13, 2019	November 9, 2020	950,377	3 years	IDR8,400	June 5, 2020 June 5, 2021 June 5, 2022	Malus
February 20, 2020	December 22, 2020	5,071,900	3 years	IDR6,630	June 5, 2021 June 5, 2022 June 5, 2023	Malus
March 29, 2021	December 30, 2021	5,724,673	4 years	IDR4,057	June 5, 2022 June 5, 2023 June 5, 2024 June 5, 2025	Malus
March 15, 2022	July 29, 2022	3,001,097	3 years	IDR5,187	June 5, 2023 June 5, 2024 June 5, 2025	Malus and Clawback
March 15, 2023	August 14, 2023	1,816,099	3 years	IDR9,037	June 5, 2024 June 5, 2025 June 5, 2026	Malus and Clawback
March 4, 2024	May 13, 2024	12,778,954	3 years	IDR4,826.33*	June 5, 2025 June 5, 2026 June 5, 2027	Malus and Clawback

*) Notes: price and total shares after the implementation of 1:2 stock split effective on October 6, 2023.
Throughout 2024 there was no Malus and Clawback exercise

Long Term Incentives (LTI)

In 2024, in addition to providing Deferred Tantiem to members of the Board of Directors and Board of Commissioners, BNI also provided Long Term Incentives (LTI), with the following basis:

1. LTI is given in the form of BBNI shares for members of the Board of Directors and non-independent members of the Board of Commissioners and in cash for Independent Commissioners.
2. LTI is awarded based on the achievement of agreed performance targets for the next 3 years; and
3. Income tax (PPh) on LTI is the recipient's expense and is not permitted to be charged as a company expense.

Eligibility

1. The Board of Directors and Board of Commissioners are declared entitled to LTI from the date of appointment at the General Meeting of Shareholders (GMS).
2. The Board of Directors and Board of Commissioners must obtain approval for the fit and proper test from the Financial Services Authority (OJK) and are entitled to LTI from the date of appointment at the GMS (retroactive).
3. Members of the Board of Directors and Board of Commissioners who have held positions as the Board of Directors or Board of Commissioners of BNI on the date of issuance of the LTI grant letter from Series A Dwiwarna Holder.

Initial award

1. LTI allocation for members of the Board of Directors and members of the Non-Independent Board of Commissioners given in nominal Rupiah is converted into a number of BNI shares.
2. LTI allocation for members of the Independent Board of Commissioners is given in cash in nominal Rupiah.
3. The LTI allocation given to each member of the Board of Directors and members of the Board of Commissioners considers position factors.

Performance period (performance/vesting period)

1. The performance measurement period is annual (January-December) for 3 years;
2. LTI vests fully in the fourth year (2026) after the financial statements have been audited by an independent auditor and the Annual Report is approved by/determined at the GMS.

Performance Targets

To ensure the company's sustainable performance, the company sets long-term performance target indicators that underlie Long Term Incentive (LTI) payments, namely:

1. Total Shareholder Return (TSR)
2. Return on Equity (ROE)
3. 3 Gross Non-Performing Loans (NPL).

The actual achievement of each performance indicator will be calculated in accordance with the following provisions:

No.	Actual Achievements	Percentage of Achievement for each Performance Metric
1)	Positive polarity Actual > Target	100% x Weight
	Positive polarity Threshold < Actual < Target	
2)	Positive polarity Threshold < Actual < Target	(Actual/Target) x Weight
	Negative polarity Threshold > Actual > Target	(Target – (Realization – Target))/Target x Weight
3)	Positive polarity Actual < Threshold	Nil
	Negative polarity Actual < Threshold	

Final Award and Holding Period [ACGS D.3.13]

1. The final award is the final amount of LTI in the form of a number of the company's shares or cash from awards given to members of the Board of Directors and Board of Commissioners, based on the total achievement of the agreed SOE performance targets during a certain time period.
2. LTI vested after the performance measurement period will be subject to a holding period of 2 years for members of the Board of Directors and Non-Independent Board of Commissioners who serve during that period, with the following conditions:

Description	Holding Period		After Holding Period
	First Year	Second Year	
Total number of shares available for sale	Max. 25%	Max. 50%	Max. 100%

3. The holding period is not imposed on the Board of Directors and Non-Independent members of the Board of Commissioners whose term of office has ended.
4. For members of the Board of Directors and Board of Commissioners whose term of office ends before 3 (three) years, LTI will be calculated proportionally based on the length of service in the performance period (calendar days) and the average performance achievement over 3 (three) years.

The following table presents detailed information regarding the Allocation of Long-Term Incentives (LTI) in the form of Shares to Non-Independent Members of the Board of Directors and Board of Commissioners of BNI:

Date of GMS	Date of Determination of Long Term Incentives Allocation	Total Shares	Time Period	Determination Price*	Vesting Period	Policy
March 15, 2023	December 15, 2023	15,637,000	3 years	Rp4,704	2027 2028 2029	Malus and Clawback
March 4, 2024	November 5, 2024	27,581,400	3 years	Rp4,593	2028 2029 2030	Malus and Clawback

*) The determination price is the Fair Value price of the Independent Consultant.

Employee Stock Ownership Program [ACGS B.6.3]

The Employee Stock Ownership Program at BNI, known as the Employee Stock Allocation (ESA) program, is a stock allocation program for employees who meet certain criteria and requirements as outlined in the Program Implementation Guidelines.

The objectives of the ESA program are:
1. A long-term employee retention strategy;
2. An effort to motivate employees to consistently deliver their best performance, thereby improving BNI's performance and ultimately enhancing BNI's stock price;
3. Enhancing employees' sense of ownership toward BNI;
4. As part of the enhancement of employees' risk awareness, reflected in eligibility and the lock-up period.

The resolutions of the General Meeting of Shareholders (GMS) on March 15, 2022, approved the delegation of authority for the implementation of the Employee Stock Ownership Program, both from treasury stock and other sources, to the Board of Directors, while adhering to applicable laws and regulations.

Eligible Employee Requirements

Employees who are entitled to receive vesting allocations and opening lock-up periods in the Employee Stock Allocation (ESA) Program must meet the following requirements:
1. Have status as a permanent employee as of December 31, 2021, and still be active at the time of vesting allocation and opening of the ESA Program lock-up period;
2. Have a minimum term of office of 1 (one) year at the time of granting the ESA Program vesting allocation;
3. Have a performance assessment and employee classification in accordance with the provisions when granting vesting allocations and opening the lock-up period of the ESA Program;
4. Not currently undergoing administrative sanctions.

Participants who are eligible for allocation, vesting, or opening of the lock-up period will receive notification via email or other communication media. The notification will contain confirmation regarding the shares the participant is entitled to at the time of allocation, vesting, and opening of the lock-up period. In the third stage of opening the lock-up period in 2025, all shares allocated through the Employee Stock Allocation (ESA) Program will be fully distributed to participants.

Mechanism for Distribution of Shares in the Employee Stock Allocation Program (ESA)

The allocation and vesting of shares in the Employee Stock Allocation (ESA) Program began on June 2, 2022, with the application of the lock-up period based on job level:
- Assistant Vice President (AVP) and above: lock-up period of 3 (three) years.
- Manager (MGR) and below: lock-up period of 1 (one) year.

During the lock-up period, participants in the ESA Program are not permitted to engage in any activity with the shares that have become their entitlement. This policy is implemented as part of a long-term retention strategy and to motivate employees to continuously improve performance.

The unlocking of the lock-up period occurs annually, when participants are allowed to use or trade shares that have become their entitlement. However, participants must meet the criteria and requirements outlined in the ESA Program Implementation Guidelines.

For Manager (MGR) and below positions, the unlocking of the lock-up period took place simultaneously on June 2, 2023. For Assistant Vice President (AVP) and above positions, the unlocking will occur progressively in three stages: June 2, 2023, 2024, and 2025.

Details of the Employee Stock Allocation Program (ESA) Grant

The details of the Employee Stock Allocation (ESA) grant to employees are outlined in the following table:

Date of GMS	Allocation and Vesting Dates	Total Shares	Price per Share	Opening of Lockup Period
March 15, 2022	June 2, 2022	53,839,984*	IDR8,850*	June 2, 2023
		23,147,202	IDR4,400	June 2, 2024
		25,475,142	-	June 2, 2025

*) Price and total number of shares before the implementation of the 1:2 stock split which is effective on October 6, 2023.

Distribution of Shares for Employees Who Are Material Risk Takers (MRT)

In implementing the provision of Remuneration, BNI is obliged to determine parties who are Material Risk Takers (MRT) who at least meet the following criteria:

a. The Board of Directors and/or other employees who, due to their duties and responsibilities, make decisions that have a significant impact on BNI's risk profile; or
b. The Board of Directors, Board of Commissioners, and/or Employees who receive Variable Remuneration with a large value.

Based on the Resolution of the Board of Directors Meeting, on December 20, 2016, BNI has implemented Governance in providing remuneration by determining employees who meet the criteria for MRT, namely employees at the Senior Executive Vice President (SEVP) level. BNI is also obliged to defer the payment of variable remuneration to SEVP-level employees as parties who are MRT, namely at a certain percentage in accordance with the percentage for the Board of Directors.

In the 2023 annual performance bonus payment for SEVP-level employees, which is paid in 2024, 20% of the annual bonus is given in the form of deferred company shares (Malus). These shares come from direct purchases on the market, with the purchase period starting from May 3, 2024, to May 17, 2024.

All provisions relating to Material Risk Takers (MRT) are in accordance with the provisions stipulated in POJK No. 45/2015.

Distribution of Shares of Performance Stock Bonus Program

In order to improve savings performance, Management will provide rewards as a performance booster to increase savings growth in 2024 in the form of a share ownership program for managerial-level employees and the smallest Unit Manager (Sub Branch Manager) who meet the specified criteria, with the share allocation given to increase savings performance called the Performance Stock Bonus.

Eligible Employee Requirements

Employees who are entitled to receive vesting allocations and opening lock-up periods in the Performance Stock Bonus Program must meet the following requirements:

1. Permanent employees as of February 29, 2024; and
2. Have a 2023 performance assessment of at least Tier 3; and
3. Not currently in the process of a case/undergoing the impact period of Administrative Sanctions; and
4. Not currently undergoing a retirement preparation period/sick leave/non-dependent leave; and
5. The definitive position levels and definitive positions are as follows:
   a. MGR and above in all positions, except Staff positions/Staff Waiting for Placement/ Employees Placed in other Companies outside the BNI Group; or
   b. AMGR in the positions of Branch Business Manager (BBM), Branch Service Manager (BSM), and Sub Branch Manager Head.

Participants who are eligible for allocation, vesting, or opening of the lock-up period will receive notification via email or other communication media. The notification will contain confirmation of the shares the participant is entitled to at the time of allocation, vesting, and opening of the lock-up period.

Share Distribution Mechanism for Performance Stock Bonus Program

The allocation and vesting of shares in the Performance Stock Bonus Program were carried out immediately on April 25, 2024. During the lock-up period, Program participants are not permitted to carry out any activities on shares that have become vested. This policy is implemented as part of the active role of all employees, especially managerial levels and Sub Branch Managers, to support BNI's performance achievements in 2024, both savings and other performance targets, to be more sustainable in the future and to motivate employees to continue to improve their performance in a sustainable manner.

Details of the Performance Stock Bonus Program Provision

Details of the provision of the Performance Stock Bonus Program to employees are described in the following table:

Date of GMS	Allocation and Vesting Dates	Total Shares	Price per Share	Opening of Lockup Period
March 25, 2023	April 25, 2024	24,877,600	IDR4,442	BNI savings position is achieved according to target or the opening of the lock up period will be carried out no later than 1 (one) year after the allocation and vesting date.

Policy for Disclosure of Information on Share Ownership of the Board of Commissioners and the Board of Directors and its Implementation

POLICY FOR DISCLOSURE OF INFORMATION ON SHARE OWNERSHIP OF THE BOARD OF COMMISSIONERS AND THE BOARD OF DIRECTORS [ACGS C.1.3]

Transparency in share ownership by members of the Board of Directors and Board of Commissioners is an important aspect of maintaining public trust and ensuring compliance with capital market regulations. As a company listed on the Indonesia Stock Exchange, BNI is obliged to follow OJK Regulation No. 4 of 2024 concerning Ownership Reports or Any Changes in Ownership of Public Company Shares and Reports on Pledging Activities for Public Company Shares.

Article 2 of the POJK states that members of the Board of Directors or members of the Board of Commissioners who own shares with voting rights either directly or indirectly are required to submit a report on ownership of voting rights over shares and any changes in ownership of voting rights over Public Company shares to the OJK. The report must be submitted immediately no later than 5 (five) working days from the occurrence of ownership of voting rights on shares or any change in ownership of voting rights on shares of a Public Company. [ACGS C.1.3]

In addition to reporting obligations to the Financial Services Authority (OJK), members of the Board of Directors and Board of Commissioners are also required to report ownership and any changes in share ownership of public companies to BNI. Submission of this information must be made no later than 3 (three) working days after the ownership or change in ownership of the shares occurs. Members of the Board of Directors and Board of Commissioners are required to submit the report to the Corporate Secretary. This reporting obligation is stipulated in the Decree of the Board of Commissioners. No. KEP/024/DK/2024 dated October 22, 2024, concerning the Charter of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk, as well as the Board of Directors' Decree No. KP/339/DIR dated August 6, 2024 concerning the Charter of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk. [ACGS A.7.1]

POLICY IMPLEMENTATION IN 2024

Throughout 2024, there have been changes in BNI share ownership by non-independent members of the Board of Directors and Board of Commissioners, all of which have been reported to the OJK using procedures and mechanisms in accordance with applicable regulations.



SHARE OWNERSHIP OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS AT BNI [ACGS C.5.1]

The detailed report on changes in share ownership by the Board of Commissioners and Directors in 2024 is presented in the following table:

Name	Position	Share Ownership				
		Per January 1, 2024	Per December 31, 2024	Transaction Description	Number of Shares	
BOARD OF COMMISSIONERS						
Pradjoto	President Commissioner (Independent Commissioner)	0	0			
Pahala Nugraha Mansury	Vice President Commissioner	0	677,291 (0.0018%)	Transfer	410,600 share	
				Transfer	127,091 share	
				Purchase	139,600 share	
Sigit Widyawan	Independent Commissioner	0	0	-	-	
Askolani[1)]	Commissioner	809,086 (0.0021693%)	1,752,462 (0.0046%)	Transfer	514,200 share	
				Transfer	429,176 share	
Asmawi Syam	Independent Commissioner	0	0	-	-	
Septian Hario Seto	Independent Commissioner	0	0	-	-	
Iman Sugema	Independent Commissioner	0	0	-	-	
Erwin Rijanto Slamet	Independent Commissioner	0	0	-	-	
Fadlansyah Lubis	Commissioner	43,484 (0.0001166%)	986,860 (0.0026%)	Transfer	514,200 share	
				Transfer	429,176 share	
Robertus Billitea	Commissioner	42,400 (0.001137%)	864,066 (0.0023%)	Transfer	479,500 share	
				Transfer	342,166 share	
Mohamad Yusuf Permana[2)]	Commissioner	0	0	-	-	
Susyanto[3)]	Commissioner	634,594 (0.0017014%)	-	Transfer	514,200 share	

Changes in Share Ownership						
	Transaction Purpose	Price	Transaction Date	Reporting Date to BNI	Date of Reporting to OJK	Share Ownership Status
	-	-	-	-		-
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of the implementation of the Financial Services Authority Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks.	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	Investment	Rp5,000,-	July 17, 2024	July 17, 2024	August 8, 2024	Immediately
	-	-	-	-	-	-
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of the implementation of the Financial Services Authority Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks.	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of the implementation of the Financial Services Authority Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks.	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of the implementation of the Financial Services Authority Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks.	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	-	-	-	-	-	-
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately

Name	Position	Share Ownership				
		Per January 1, 2024	Per December 31, 2024	Transaction Description	Number of Shares	
BOARD OF DIRECTORS						
Royke Tumilaar	President Director	1,115,346 (0.0029904%)	3,656,941 (0.0098%)	Transfer	1,269,600 share	
				Purchase	212,300 share	
				Transfer	1,059,695 share	
Putrama Wahju Setyawan[4]	Deputy President Director	1,686,386 (0.0045215%)	3,879,526 (0.0104%)	Transfer	1,079,200 share	
				Transfer	900,740 share	
				Purchase	213,200 share	
Novita Widya Anggraini	Finance Director	948,044 (0.0025419%)	3,143,884 (0.0084%)	Transfer	1,079,200 share	
				Purchase	105,900 share	
				Transfer	900,740 share	
				Purchase	110,000 share	
Corina Leyla Karnalies[5]	Retail Banking Director	1,442,034 (0.0038663%)	3,506,474 (0.0094%)	Transfer	1,079,200 share	
				Purchase	84,500 share	
				Transfer	900,740 share	
David Pirzada	Risk Management Director	880,044 (0.0023595%)	2,859,984 (0.0076%)	Transfer	1,079,200 share	
				Transfer	900,740 share	
Ronny Venir	Network & Services Director	1,559,656 (0.0041817%)	3,539,596 (0.0094%)	Transfer	1,079,200 share	
				Transfer	900,740 share	

Changes in Share Ownership						
	Transaction Purpose	Price	Transaction Date	Reporting Date to BNI	Date of Reporting to OJK	Share Ownership Status
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	Investment	Rp4,710,-	May 7, 2024	May 7, 2024	May 8, 2024	Immediately
	As part of the implementation of the Financial Services Authority Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks.	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	As part of the implementation of the Long Term Incentive (LTI) for Non-Independent members of the Board of Directors and Board of Commissioners as stipulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of the implementation of the Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	Investment	Rp4,690,-	May 8, 2024	May 8, 2024	May 8, 2024	Immediately
	As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	Investment	Rp4,720,-	May 7, 2024	May 7, 2024	May 8, 2024	Immediately
	As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	Investment	Rp4,510,-	May 30, 2024	May 30, 2024	June 5, 2024	Immediately
	As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	Investment	Rp4,740,-	May 8, 2024	May 8, 2024	May 8, 2024	Immediately
	As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
	As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
	As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately

Name	Position	Share Ownership				
		Per January 1, 2024	Per December 31, 2024	Transaction Description	Number of Shares	
Mucharom	Human Capital & Compliance Director	348,008 (0.0009331%)	2,541,148 (0.0068%)	Transfer	1,079,200 share	
				Purchase	213,200 share	
				Transfer	900,740 share	
Toto Prasetio	Technology & Operations Director	89,856 (0.0002409%)	2,163,696 (0.0058%)	Transfer	1,079,200 share	
				Transfer	62,100 share	
				Purchase	32,000 share	
				Transfer	900,740 share	
I Made Sukajaya[6)]	Enterprise & Commercial Banking Director	4 (0.0000000%)	576,912 (0.0015%)	Transfer	576,912 share	
Hussein Paolo Kartadjoemena[6)]	Digital and Integrated Transaction Banking Director	301,478 (0.0007%)	918,611 (0.0024%)	Purchase	211,800 share	
				Transfer	405,333 share	
Agung Prabowo[7)]	Wholesale & International Banking Director	101,356 (0.0002%)	101,356 (0.0002%)	-	-	
Munadi Herlambang[8)]	Institutional Banking Director	0	0	-	-	
Adi Sulistyowati[9)]	Deputy President Director	905,706 (0.0024283%)	-	Transfer	1,142,700 share	
Sis Apik Wijayanto[9)]	Enterprise & Commercial Banking Director	1,579,946 (0.0042361%)	-	Transfer	1,079,200 share	
Silvano Winston Rumantir[9)]	Wholesale & International Banking Director	948,044 (0.0025419%)	-	Transfer	1,079,200 share	
Muhammad Iqbal[9)]	Institutional Banking Director	948,044 (0.0025419%)	-	Transfer	1,079,200 share	

1. His term of office ended and he was reappointed based on the decision of the Annual GMS dated March 4, 2024 as Commissioner for the second period since March 4, 2024.
2. Serving as Commissioner since March 4, 2024 and effective based on OJK approval since September 2, 2024
3. Ceased to serve as Commissioner since March 4, 2024
4. Received a transfer of assignment as Director of Retail Banking to Deputy President Director since March 4, 2024 and effective based on OJK approval since September 2, 2024
5. Transferred his original assignment as Director of Digital and Integrated Transaction Banking to Director of Retail Banking since March 4, 2024.
6. Served as Director since March 4, 2024 and effective based on OJK approval since September 2, 2024
7. Serving as Director of Wholesale & International Banking since March 4, 2024 and effective based on OJK approval since October 7, 2024
8. Serving as Director of Institutional Banking since March 4, 2024 and can only carry out actions, duties and functions after obtaining OJK approval
9. Ceased to serve as Director since March 4, 2024

Changes in Share Ownership

Transaction Purpose	Price	Transaction Date	Reporting Date to BNI	Date of Reporting to OJK	Share Ownership Status
As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
Investment	Rp4,690,-	May 8, 2024	May 8, 2024	May 8, 2024	Immediately
As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
Investment	Rp4,835,-	May 3, 2024	May 3, 2024	May 8, 2024	Immediately
Investment	Rp4,710,-	May 7, 2024	May 7, 2024	May 8, 2024	Immediately
As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
• As part of implementing the Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks • Investment	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
Investment	Rp4,720,-	May 7, 2024	May 7, 2024	May 8, 2024	Immediately
As part of implementing Financial Services Authority Regulation Number 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks	Rp4,826.33	May 13, 2024	May 13, 2024	May 17, 2024	Immediately
-	-	-	-	-	Immediately
-	-	-	-	-	-
As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately
As part of implementing Long Term Incentives (LTI) for members of the Board of Directors and Non-Independent Board of Commissioners as regulated in the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning SOE Organs and Human Resources.	Rp4,704,-	February 15, 2024	February 15, 2024	February 23, 2024	Immediately

SHARES OWNERSHIP OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS IN BANK OR OTHER COMPANIES [ACGS C.1.3]

BNI makes the implementation of Good Corporate Governance (GCG) and compliance with regulations a top priority to maintain the company's integrity and transparency. In order to support this commitment, BNI consistently provides information regarding share ownership held by members of the Board of Commissioners and the Board of Directors at BNI, as well as at other banks, other companies, and non-bank financial institutions, both at home and abroad. This transparency step aims to ensure that each member of the Board of Commissioners and the Board of Directors can maintain independence in carrying out their duties and responsibilities.

As of December 31, 2024, it is recorded that no member of BNI's Board of Commissioners and Board of Directors owns shares in other banks, non-bank financial institutions, or other companies domiciled at home or abroad. Detailed information is presented in the following table:

Name	Position	Shareholding as of December 31, 2024			
		BNI	Other Banks	Non-Bank Financial Institutions	Other Companies
BOARD OF COMMISSIONERS					
Pradjoto	President Commissioner (Independent Commissioner)	0	Nil	Nil	Nil
Pahala Nugraha Mansury	Vice President Commissioner	677,291 (0.0018159%)	Nil	Nil	Nil
Sigit Widyawan	Independent Commissioner	0	Nil	Nil	Nil
Askolani	Commissioner	1,752,462 (0.0046986%)	Nil	Nil	Nil
Asmawi Syam	Independent Commissioner	0	Nil	Nil	Nil
Septian Hario Seto	Independent Commissioner	0	Nil	Nil	Nil
Iman Sugema	Independent Commissioner	0	Nil	Nil	Nil
Erwin Rijanto Slamet	Independent Commissioner	0	Nil	Nil	Nil
Fadlansyah Lubis	Commissioner	986,860 (0.0026459%)	Nil	Nil	Nil
Robertus Billitea	Commissioner	864,066 (0.0023167%)	Nil	Nil	Nil
Mohamad Yusuf Permana	Commissioner	0	Nil	Nil	Nil

Name	Position	Shareholding as of December 31, 2024			
		BNI	Other Banks	Non-Bank Financial Institutions	Other Companies
BOARD OF DIRECTORS					
Royke Tumilaar	President Director	3,656,941 (0.0098048%)	Nil	Nil	Nil
Putrama Wahju Setyawan	Deputy President Director	3,879,526 (0.104016%)	Nil	Nil	Nil
Novita Widya Anggraini	Finance Director	3,143,884 (0.0084293%)	Nil	Nil	Nil
Corina Leyla Karnalies	Retail Banking Director	3,506,474 (0.0094014%)	Nil	Nil	Nil
David Pirzada	Risk Management Director	2,859,984 (0.0076681%)	Nil	Nil	Nil
Ronny Venir	Network & Services Director	3,539,596 (0.0094902%)	Nil	Nil	Nil
Mucharom	Human Capital & Compliance Director	2,541,148 (0.0068132%)	Nil	Nil	Nil
Toto Prasetio	Technology & Operations Director	2,163,696 (0.0058012%)	Nil	Nil	Nil
I Made Sukajaya	Enterprise & Commercial Banking Director	576,912 (0.0015468%)	Nil	Nil	Nil
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	918,611 (0.0024629%)	Nil	Nil	Nil
Agung Prabowo	Wholesale & International Banking Director	101,356 (0.0002718%)	Nil	Nil	Nil
Munadi Herlambang[1)]	Institutional Banking Director	0	Nil	Nil	Nil

[1)] Has not been effective

Whistleblowing System

EXISTENCE AND PURPOSE OF THE WHISTLEBLOWING SYSTEM (WBS) [ACGS B.7.1]

BNI is committed to applying the principles of Good Corporate Governance (GCG) in all its activities, including through the implementation of the Whistleblowing System (WBS). WBS is a mechanism designed to support transparency, integrity, and accountability in the company's operations. This system provides an opportunity for BNI Hi-Movers, partners, and other external parties to report BNI Hi-Movers suspected of engaging in activities that violate laws, codes of ethics, or the company's internal policies. Reports can include issues such as fraud, corruption, conflicts of interest, bribery, and violations of the code of ethics or unethical conduct. Through this system, BNI aims to create a safer environment and is committed to upholding the company's ethical standards.

The primary objective of the WBS is to prevent detect potential violations at early stage and to serve as a tool for BNI to maintain the trust of all stakeholders, including customers, debtors, business partners, employees, and regulators, while ensuring that preventive actions can be taken. Furthermore, the system is designed to protect whistleblowers from retaliation or intimidation, thereby encouraging more individuals to report violations without fear. As such, BNI seeks to strengthen a work culture that is honest, transparent, and highly integrated with the ethical standards in every aspect of its business activities, while fostering a conducive work environment and enhancing the Bank's accountability.

COMMITMENT TO THE WHISTLEBLOWING SYSTEM (WBS) [ACGS B.7.1]

BNI is committed to ensuring transparency and accountability in its operational activities by implementing the WBS, known as "WBS to CEO."

The President Director ensures that all WBS reports, accompanied by relevant data and supporting evidence, will be followed up on in a professional and transparent manner. This commitment is carried out by appointing an independent party, Deloitte, to manage the WBS channels. Additionally, BNI guarantees the confidentiality of whistleblowers and the actions taken in response to violations.

Since March 2, 2021, BNI has strengthened its commitment to combating corruption through collaboration with the Corruption Eradication Commission (KPK). In this partnership, BNI actively reports complaints related to corruption cases that arise through the WBS to KPK. These reports are submitted periodically to ensure stringent oversight and guarantee accountability at every stage of the process. This collaboration is part of BNI's efforts to maintain transparency and integrity within the company, as well as to strengthen public trust in BNI's commitment to preventing corruption.

WBS MANAGEMENT

The responsibility for managing the WBS remains under the control of the President Director, with support from the Director of Human Capital & Compliance. Deloitte, as an external independent party, plays a role in providing technical support to ensure that the WBS operates according to the highest standards, while strategic decisions regarding the WBS are made internally by BNI. [ACGS (B).B.1.7]

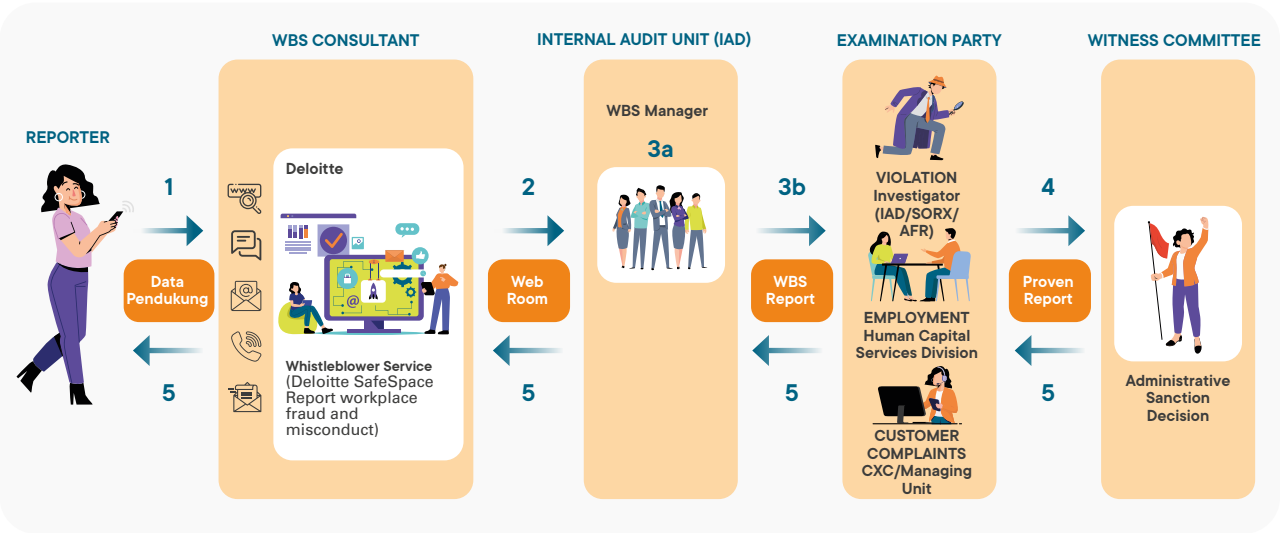
Internally, the management mechanism of the WBS involves the appointment of the Head of Internal Audit by the President Director. The Head of Internal Audit is responsible for managing the entire WBS operational process, from receiving to handling reports. The Head of Internal Audit reports the management outcomes and progress of reports to the President Director on a regular basis, ensuring that each WBS report is handled properly and transparently according to established procedures.

SUBMISSION OF WBS REPORTS [ACGS B.5.1]

To facilitate the reporting process, BNI, through Deloitte, has provided several reporting channels that can be utilized by whistleblowers, as follows:

Website:	Email:	SMS/Whatsapp:	Telephone:	Letter:
https://bni-transparan.tipoffs.info	bni-transparan@tipoffs.com.sg	081-1970-1946	021-57853377	BNI Transparan PO BOX 2646/JKP 10026

COMPLAINT REPORTING MECHANISM THROUGH WBS CHANNEL [ACGS B.7.1]



1. Whistleblowers may submit WBS reports via phone, e-mail, letter, website, or SMS/WhatsApp to the WBS Consultant from Deloitte.
   a. Deloitte will screen the WBS report. If the report does not meet the 4W1H criteria (What, Who, Where, When, How), Deloitte will request additional supporting data from the Whistleblower.
   b. The Whistleblower will then provide the requested supporting data to Deloitte.
2. Subsequently, Deloitte will forward the WBS report to the WBS Manager, which is the Internal Audit.
3. Internal Audit will analyze the WBS report and conduct a direct investigation. If necessary, the report will be forwarded to the Senior Operational Risk Executive (SORX), Anti-Fraud Unit (AFR), or the relevant Division/Unit/Unit according to the nature of the report, as follows:
   a. Reports related to violations will be forwarded to the Investigator Unit.
   b. Employee-related issues will be forwarded to the Human Capital Division.
   c. Customer complaints will be forwarded to the Customer Experience Center Division or the Managing Unit.
4. The results of the follow-up actions for WBS reports that are proven to involve violations will result in administrative sanctions in accordance with applicable regulations.
5. Each unit/Division that follows up on a WBS report must submit the results of their actions to Internal Audit, which will then forward the information to Deloitte for communication with the Whistleblower.

PROTECTION FOR WHISTLEBLOWERS [ACGS: B.7.2]

BNI is committed to providing maximum protection and safeguarding every report received. Protection for the Whistleblower is fundamentally a right afforded to them. This aims to ensure the safety of the Whistleblower against any threats or actions that may arise as a consequence of submitting a violation report.

To protect confidentiality and provide maximum protection for Whistleblowers, BNI offers several options for disclosing identity when reporting via the WBS, as follows:

1. The Whistleblower may choose to fully disclose their identity to the WBS Consultant Team and BNI (Full Disclosure).
2. The Whistleblower may disclose their identity only to the WBS Consultant Team without forwarding it to BNI (Partial Anonymity).
3. The Whistleblower has the option to remain completely anonymous, where their identity is unknown both to the WBS Consultant Team and BNI (Anonymous).

However, to maintain the integrity of the reporting process, BNI may impose sanctions on the Whistleblower if it is proven that the report was defamatory and had other purposes contrary to the intent and objectives of the WBS Policy. Such sanctions will be in accordance with applicable regulations.

TYPES OF VIOLATIONS THAT CAN BE REPORTED

In accordance with applicable regulations, the types of violations that can be reported through BNI's WBS mechanism include:

1. Fraud
   Fraud refers to dishonest acts or deceitful practices, including, but not limited to, fraud, extortion, forgery, concealment or destruction of documents/reports, and the use of counterfeit documents. These actions may be carried out by individuals or groups and have the potential to cause actual harm or loss to the Bank.
2. Violation of Regulations/Laws
   Acts or deeds that violate the law and are subject to penalties in accordance with applicable legal provisions, whether internal or external.
3. Conflict of Interest
   A situation where members of the Board of Directors, Board of Commissioners, committee members, permanent/non-permanent employees/outsourcing (BNI Hi-Movers) have personal interests that could influence the objective performance of duties entrusted by the Bank. This may result in a conflict between personal, group, or family interests and the Bank's economic interests.
4. Bribery/Gratification/Extortion (Illegal Levies)
   Receiving anything of value, in any form or amount, from a third party related to a position, authority, or responsibility at the Bank.
5. Violation of Code of Conduct/Unethical Behavior
   Acts or conduct performed by BNI Hi-Movers that are ethically unjustifiable, including violations of the Code of Conduct.

ROLES OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS IN BNI'S WBS

The Board of Directors and the Board of Commissioners play strategic roles in the implementation and oversight of the WBS. The Board of Directors is responsible for reviewing and approving the policies and procedures of the WBS. Additionally, the Board of Directors regularly receives reports related to the WBS, including the number of reports received, their handling status, and recommended follow-up actions. Based on these reports, the Board provides input and direction to ensure the effectiveness of the system and proper handling.

On the other hand, the Board of Commissioners carries out an oversight function by receiving and reviewing WBS reports presented through the Audit Committee on a regular basis. The Board of Commissioners then provides strategic direction and guidance to ensure that the WBS operates in accordance with good governance principles, supporting the creation of a transparent and integrity-driven work environment at BNI.

SOCIALIZATION OF WBS IMPLEMENTATION

The socialization of WBS implementation at BNI is carried out comprehensively to ensure that all BNI Hi-Movers understand the importance of this system and the reporting procedures. Various activities such as surveys, training sessions, and distribution of informational materials are employed.

In 2024, the socialization of WBS at BNI was successfully executed, utilizing a more innovative and integrated approach. Various communication platforms were leveraged to deliver clear and comprehensive information regarding the WBS, including its roles, benefits, and reporting procedures. As such, all employees are expected to gain a deeper understanding of the importance of the WBS in fostering a transparent and accountable work environment. This effort also aims to encourage active participation from employees in reporting potential violations, thereby strengthening the culture of integrity at BNI.

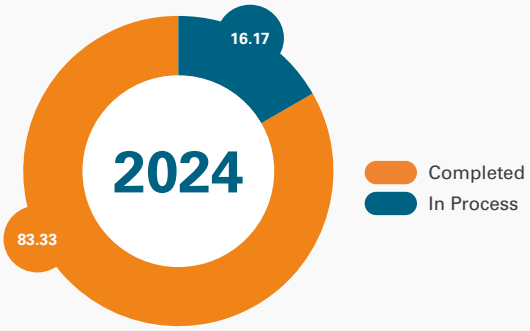
RESULTS OF COMPLAINT HANDLING

Number of Complaints in 2024

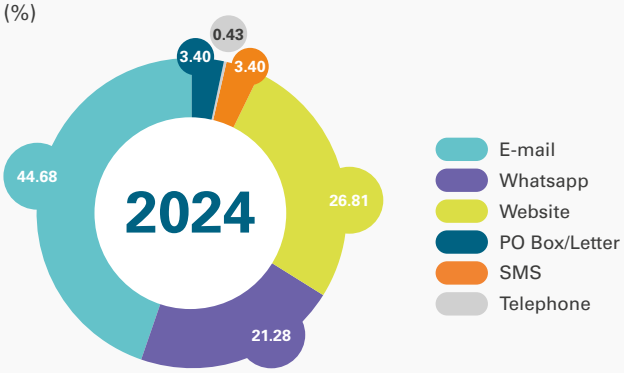
Throughout 2024, the number of reports of alleged violations received through the WBS mechanism totaled 296 reports. The highest volume of complaints came through e-mail, accounting for 39.19% of the total reports. The second most common channel was website, with a percentage of 31.76%, followed by the third channel, WhatsApp, contributing 22.97% of the total reports.

Of the total complaints, 83.45% or 247 reports were followed up during 2024, with 51 reports substantiated and 196 reports found to be unsubstantiated.

Report Status
(%)



Complaint Channel
(%)



FOLLOW-UP ON COMPLAINTS IN 2024

Each report received through the WBS undergoes an investigative process, and if a violation of applicable regulations is substantiated, sanctions will be imposed on the reported party in accordance with BNI's policies. In 2024, BNI imposed sanctions on 10 employees, 3 of whom received sanctions in the form of termination of employment. The application of these sanctions aims to enforce compliance with the Bank's ethical standards and integrity, as well as to maintain BNI's credibility in the eyes of stakeholders. Through this measure, BNI demonstrates its commitment to preventing violations and fostering a more transparent and accountable work environment.

Strategic Plan for the Bank

BNI CORPORATE PLAN 2024-2028

The global and domestic economic conditions remain a key area of focus. Various policies and regulations will be shaped by the political landscape over the next five years, especially as 64 countries representing 49% of the global population hold elections in 2024, including major nations such as the United States and European Union countries, which will form new governments in 2025. In the financial sector, the banking industry faces increasingly intense competition, particularly as technological advancements give rise to new players outside the traditional banking sector, offering financial services akin to those provided by banks.

Domestically, the government aims to drive economic growth from its current level of 5% to 6% in the medium term, with aspirations to accelerate this growth to 8% in pursuit of Indonesia's Vision 2045. This vision seeks to avoid the "middle-income trap" and establish Indonesia as the fifth-largest economy in the world, with a GNI per capita of USD 30,300 - effectively making it a developed nation by 2045. To achieve this, investment growth must increase to 8% from the current average of 4% between 2021 and 2024. Investment will be directed toward high-tech manufacturing and services, including downstream natural resources and agriculture sectors.

On the consumption front, which accounts for 53% of Indonesia's economic composition, growth is expected to remain robust in the medium term, supported by a favorable demographic profile. Indonesia is currently at the peak of its demographic dividend, as the dependency ratio (the ratio of non-productive to productive age groups) is at its lowest. Over 50% of the population consists of millennials and Gen-Z. Additionally, consumption will be driven by the expanding middle and aspiring middle-income classes, which currently make up 66% of the population.

To achieve the Vision of Indonesia Emas 2045, the government has outlined the national development direction in the Long-Term National Development Plan (RPJPN) for 2025-2045, which is further articulated in the Draft Medium-Term National Development Plan (RPJMN) for 2025-2029. The government has set five key objectives, namely, achieving a per capita income level comparable to that of developed nations, reducing poverty and inequality, enhancing international leadership and influence, improving human competitiveness, and reducing greenhouse gas emissions toward a net-zero emission goal. The banking sector plays a critical role in supporting these objectives, particularly through its function in fostering inclusive economic growth, supporting priority sectors, and advancing green economy initiatives through integrated financial and transactional services, as well as deepening financial sector intermediation.

In response to these developments, the Company affirms that its Long-Term Corporate Plan for 2024-2028 remains a relevant strategic framework. The Corporate Plan is developed through 4 (four)-phase approach, known as the 4D (Dream, Discovery, Design, and Delivery) model. This process involves almost all of BNI's leadership to ensure ownership from the formulation stage through to implementation. After extensive analysis and discussions, and in consideration of existing challenges and opportunities, as well as the aspirations of the controlling shareholders articulated by the Ministry of State-Owned Enterprises (SOE), BNI has set a long-term aspiration for 2028 to become "**The Bank with the Best Technology & People at the Core to Serve You**." This strategic direction will form the unique value propositions that BNI will build moving forward, focusing on three core areas: **Productivity, Platform**, and **Proposition**. These areas will serve as key drivers of BNI's competitive advantage in the banking industry.



In terms of portfolio strategy, BNI aspires to drive sustainable growth by focusing on healthy growth in the Corporate segment, including both private and state-owned enterprises (SOEs), as well as the Consumer segment, which will serve as the second pillar of growth after Corporate. Efforts to improve the small and medium-sized business (SME) segment will continue, aiming to enhance productivity and asset quality, with growth directed towards the wholesale business value chain.

BNI also acknowledges that the progress and success of the Bank's performance are closely tied to the environmental and social impacts arising from its activities. Therefore, BNI is committed to supporting Net Zero Emission (NZE) goals and climate resilience through environmental management, both in its internal operations and the external ecosystem. The company has established an ESG roadmap with targets for reducing greenhouse gas (GHG) emissions and supporting NZE, with the goal of achieving NZE by 2028 in operations and by 2060 in financing.

BNI STRATEGIC POLICIES FOR 2024

Amid the dynamic macroeconomic conditions throughout 2024, which impact the bank's business environment, the company continuously monitors developments and mitigates their effects on strategic policy implementation, business achievement in 2024, and the long-term sustainability of business goals.

According to the Corporate Plan 2024-2028, BNI's focus for 2024 is to continue improving productivity by developing capabilities, redesigning roles, optimizing branch networks and analytics, and building and enhancing platforms to improve services and client experiences. This focus is outlined in six key strategies for 2024:

1. **Expand business with top-tier clients by strengthening risk management**
2. **Enhance digital platforms to optimize transactional banking and cross-selling, with a focus on increasing AUM (Assets Under Management), CASA (Current Account Savings Account), and sustainable FBI (Fee-Based Income)**
3. **Strengthen the business network by optimizing outlets**
4. **Develop international business networks to support global market penetration**
5. **Strengthen human capital and IT to enhance productivity**
6. **Optimize the BNI Group to reinforce the position of subsidiary companies**

As a translation of the Company's aforementioned key strategies, several important initiatives for 2024 include improving productivity through increasing the role of frontliners (Customer Service and Teller) in supporting marketing, reinforcing the sales force, and implementing the sales generalist model across all regional offices and branches. This approach aims to provide optimal, responsive services while consistently delivering solutions that align with customer needs, and further developing digital services to support the customer journey.

In 2024, BNI launched a personal transaction application built with the latest technology platform, wondr by BNI. Launched on July 5, 2024, coinciding with BNI's 78th anniversary, wondr by BNI was developed through in-depth research and adheres to industry excellence standards both domestically and globally. It is projected to be a game-changer for both BNI and the Indonesian banking industry. At the end of December 2024 or 6 months after the release, wondr by BNI has been downloaded by 5.3 million users, with a high level of active users transacting, the proportion of which has increased by 65% compared to the previous BNI Mobile Banking.

In October 2024, BNI introduced the transformation of the wholesale digital platform, BNIdirect, a digital platform for wholesale customers. The service provides a variety of wholesale solutions ranging from Cash Management, Trade, Supply Chain, Receivables, and Foreign Exchange in just one integrated platform, BNIdirect.

Throughout 2024, the BNIdirect platform has been used by 173 thousand users, with a transaction volume of Rp7,931 trillion, an increase of 23.3% from the previous year. This increase in transaction volume then contributed significantly to the acquisition of current account funds from companies and institutions that are the Company's wholesale customers.

BNI is further strengthening its role as Indonesia's business orchestrator in the global market by expanding its network and enhancing international business capabilities. Currently, BNI is present in 8 global financial hubs, including Singapore, Hong Kong, Tokyo, Osaka (Japan), New York (USA), Seoul (South Korea), London (UK), Amsterdam (Netherlands), and the latest addition in Sydney, Australia, which was inaugurated in September 2024.

Strengthening the role of subsidiary companies is also a key focus, with ongoing efforts to optimize synergies within the BNI Group. Several synergies have already been implemented, including joint financing collaborations between BNI and BNI Finance through motor vehicle loans (KKB), as well as Hibank, a future growth engine for BNI in the SME sector utilizing the BNI Group ecosystem. In 2024, credit and financing disbursed by subsidiary companies amounted or marking a 79.7% YoY increase.

BNI TRANSFORMATION

Since the start of the transformation program in 2021, BNI has launched BNI Corporate Transformation until April 2024 to improve and innovate business processes, face challenges in the banking industry, and improve financial performance in a sustainable manner. Transformation will definitely continue to be carried out on an ongoing basis to support the achievement of BNI's strategic direction in 2024. The following are the five focuses of BNI Transformation that have been implemented in 2024:

1. **End-to-end digitization of sustainable loan business processes to support quality business growth**
   In order to carry out one of the strategic steps in 2024, namely increasing business expansion through the top tier by strengthening risk management, BNI is continuously developing end-to-end loan tools for all Relationship Managers in the Corporate, Enterprise, Commercial, Retail Productive and Consumer segments. This supports BNI in improving

loan quality, efficiency, and work effectiveness in the loan process while still prioritizing prudential banking. One of the outputs of loan tools digitization in 2024 is the Wholesale Loan Management System (LMS), where previously in 2023 BNI launched Connect as an RM Tool in carrying out the pipeline management stage.

Wholesale LMS is an integrated system designed to manage the entire loan cycle in the Wholesale Business Banking segment efficiently and comprehensively. This system includes various important stages, starting from pipeline management, which helps in managing loan prospects and business opportunities, to an in-depth loan analysis process to assess applicant eligibility. Furthermore, Wholesale LMS supports a faster and more accurate approval process, followed by well-organized and documented loan administration.

In addition, this system also provides a continuous loan monitoring feature to ensure portfolio quality is maintained, as well as a Remedial & Recovery module to manage the risk of non-performing loan.

2. **The development of a new Digital Platform was carried out as part of efforts to improve customer experience**
   To be able to provide comfort and a better transaction experience for customers (retail and wholesale segments), apart from its outlet network, BNI also has other banking channels that are no less important, namely the digital banking platform. For digital banking channels that serve retail customer transactions, BNI has a mobile banking Super App known as Wonder by BNI. Meanwhile, to serve wholesale customer transactions, BNI has BNIdirect for Wholesale Solution, which integrates a number of financial solutions such as cash management, supply chain, foreign exchange, trade (bank guarantee), and virtual accounts.

3. **Strengthening Business Networks through Outlet Optimization**
   BNI is committed to providing a superior customer experience through personal, innovative, and accessible services. BNI actively maintains relationships with customers through a proactive approach, understanding their needs, and providing relevant financial solutions. In addition, in order to improve the customer experience, BNI utilizes digital technology and optimizes BNI service channels by transforming channels/outlets.

   BNI outlet transformation is a strategic step taken by BNI to adapt branch operations to customer needs in the digital era. This transformation aims to make BNI outlets more modern, efficient, and relevant to the demands of the times, especially with the increasing use of digital banking services. One manifestation of this transformation is the adoption of the hybrid branch concept, which combines technology-based services with the presence of staff who are skilled in providing more complex financial solutions. BNI implements new outlet formats such as Super Flagship, Business Flagship, Thematic, Digital First, and Smart Conventional, which are designed according to the specific needs of customers and outlet locations. The transformed branches not only function as transaction places but also as centers for financial consultation and education for customers.

   In addition to the transformation of outlets, BNI is also strengthening and optimizing the Frontliner function in outlets to support increasing/achieving outlet productivity through the implementation of Frontliner Revolution. Strengthening this function is not limited to sales or up-selling/cross-selling activities but also includes educational activities for customers regarding product services and referrals for BNI and Subsidiary products, as well as conducting follow-up on lead data.

   In line with optimizing the function of frontliners to increase productivity, BNI is also developing e-channels, such as DigiCS, DigiCS Lite, T-Care (banking service self-service machine), BNI SPRINT (BNI channel that functions in printing account history into savings books, A4 paper, receipts, and can be sent via email), CRM (automated machines that function to serve cash withdrawal and cash deposit transactions), more sophisticated automated teller machines (ATM) to support transactions independently, and Biometric Fingerprint to speed up and make it easier to verify customer identity. This transformation aims to reduce queues, increase operational efficiency, and provide a better experience to customers. With this step, BNI seeks to maintain a balance between digital and physical services so that it remains inclusive for

all levels of society, including those who still need face-to-face services.

4. **BNI as Indonesian Business Orchestrator to Global Market**

   In order to carry out the mandate from the government to strengthen BNI's role as a global bank, BNI's commitment is further strengthened by again presenting BNI Representative Offices abroad. This time, on September 5, 2024, BNI inaugurated the opening of its representative office in Sydney, Australia, and was the first bank representative from Indonesia to open an office in Australia.

   In addition, BNI also increases the value of its international network through diaspora engagement, strategic partnerships, innovative financial solutions, and a focus on compliance and operational excellence. BNI plays an active role in encouraging the Indonesian Diaspora and Exports through BNI Xpora, which is a one-stop solution that can support Indonesian SMEs in developing their business abroad through the pillars of Go Productive, Go Digital, and Go Global. This will be a comprehensive solution (end-to-end) for domestic SMEs (sellers) and diaspora entrepreneurs or global buyers (buyers) abroad.

   BNI Xpora, which was launched in August 2021, is increasingly showing positive developments. 2024 marks a major step in making Xpora a comprehensive and integrated export-related program, which supports Indonesian SMEs related to exports through training, mentoring, and wider access to global markets. BNI Xpora also provides more flexible financing solutions, including export-based financing and payment schemes that are more in line with export needs. This can make it easier for business actors to manage their working capital in developing business in the global market.

5. **Strengthening Human Capital to increase productivity through changes in behavior and work rhythm in Commercial Business Centers (CMC), Regional Offices, Retail Productive Business Centers (RCC), and Branch Offices**

   In line with one of the focuses of the unique value proposition that BNI will build, namely productivity, BNI strengthens human capital through skills development and changes in behavior and work rhythm. To be able to realize this, BNI is trying to encourage Relationship Managers (RM) to become more militant and in the market and leaders to become more hands-on with high ownership through implementing strategic initiatives related to productivity enhancement. Changes in behavior and work rhythm are measured based on several leading indicator matrices, which are monitored regularly via the leading indicator dashboard. One example of a matrix that is measured is the adequacy of leads owned by RMs and the assistance of leaders to RMs when visiting customers and other strategic assistance.

   In meeting the sufficiency of these leads, each RM is also helped by the existence of Connect (for RMs in the Corporate, Enterprise, Commercial, and Retail Productive Segments) and Digisales (for RMs in the Consumer Segment), which are tools that support RMs in carrying out the pipeline management stage. Lead data, whether derived from corporate customer partners or lead data resulting from canvassing by RM, will be injected into each RM's Connect and Digisales accounts.

   In following up on leads, RM can provide very useful solutions for potential customers by offering easy transactions via the BNIdirect platform through superior features designed to provide a safe and efficient transaction experience and can be used anytime and anywhere. This convenience certainly provides added value for customers so that they can feel more comfortable and confident in carrying out their banking activities. This Productivity Enhancement initiative has been implemented throughout the Region and is expected to increase productivity.

INNOVATION SUPPORTSTRANSFORMATION

BNI Strengthens Innovation Culture through Establishing a Corporate Innovation Center for a More Agile and Adaptive Future

BNI has carried out the BNI CorporateTransformation program with one of the initiatives being New Ways of Working (NWoW), which aims to adapt the organization so that it has an impact on increasing collaboration and agile ways of working among BNI employees. NWoW is one of the internal strategies implemented in 2023 in order to prepare the BNI organization for the future through new ways of working to achieve corporate strategic targets. One of the results of the NWoW initiative is the formation of a new function at BNI, namely the Corporate Innovation Center (INV) Department in the Corporate Development and Transformation Division (CDV), which has the function of managing and facilitating bottom-up innovation ideas at BNI from Hi-Movers. As part of efforts to encourage a culture of innovation, BNI not only develops the organizational structure but also strengthens the innovation ecosystem.This effort is realized through strengthening innovation branding, innovation culture, and organizing innovation events.

1. Innovation Branding
   In order to encourage innovation culture and innovation awareness, BNI strengthened innovation branding by launching the BNI Innovation Center branding and logo called "benih-innovation center by BNI." The benih logo consists of a rounded font, which has the philosophy of describing a growth mindset, which is a mindset that supports learning new things and innovating.

benih
Innovation Center by BNI

There is a Supergraphic Mark on the "benih-innovation center by BNI" logo with the theme Connecting the Dots with the meaning "an innovation that starts from a small dot to become several specific dots and shapes with the hope of having a big impact and illustrates that to achieve success there will be many challenges, but it is hoped that BNI will remain competitive and always adapt to customer needs".

2. Innovation Culture
   To support innovation culture and create a dynamic innovation ecosystem, a platform is needed to convey innovation ideas from BNI Hi-Movers. Previously, submitting innovation ideas (idea submission) was still done semi-manually by Hi-Movers via an online form. The collaboration process between Hi-Movers previously had to be done manually, making it difficult for Hi-Movers from different work units (both between divisions and regions) to collaborate in developing innovation ideas. Therefore, to support automated innovation submission and make it easier for Hi-Movers to convey innovation ideas (idea submission), BNI has provided a tool for Hi-Movers called BNI Ideabox.

   The presence of BNI Ideabox provides various benefits in supporting and managing innovation at BNI, including the following:
   1) **Manage and Identify Potential Ideas**
      All submitted ideas are stored on 1 (one) platform, making it easier to manage, review, archive, and identify ideas that have the potential to have an impact on BNI.
   2) **Encouraging Hi-Movers Participation in Innovation at BNI**
      BNI Ideabox can motivate all Hi-Movers to actively participate in innovation at BNI because it has space to voice employee ideas.
   3) **Ease of Submitting Innovation Ideas**
      BNI Ideabox can be accessed by Hi-Movers anytime and anywhere so that the innovation process can run consistently.
   4) **Increase Collaboration and Idea Development**
      Hi-Movers can collaborate to develop joint ideas and strengthen synergy between Units/Divisions/Regions.

After the launch of BNI Ideabox on June 12, 2024, until December 2024, 2,189 Hi-Movers had registered at BNI Ideabox, with a total of 232 innovation ideas that had been submitted. This figure shows the high enthusiasm of Hi-Movers in participating and contributing to creating innovations that support BNI's progress.

3. Innovation Event
   Organizing innovation events regularly plays an important role as a forum for collaboration, inspiration, and building a healthy competitive spirit among Hi-Movers, thereby encouraging them to contribute more actively in creating creative and impactful solutions.

Incubation of ideas submitted by Hi-Movers to the BNI Ideabox has also been carried out through the BNI Innovation (BINNOVA) event. BINNOVA is one of the innovation events that is routinely held within BNI's internal environment. The aim of BINNOVA is to look for the best ideas from Hi-Movers, which can be implemented to provide a positive impact, both in increasing revenue and cost efficiency, as well as increasing the effectiveness of business processes.

The following is a series of BINNOVAs carried out during 2024:

1) BINNOVA Batch 1
   In order to support the development of business innovation at BNI, the Corporate Development & Transformation Division (CDV) managed the BINNOVA Batch 1 event and selected 20 teams with the best innovation. After going through the customer validation (CV) and product validation (PV) stages, 5 teams were selected to enter the BINNOVA Grand Final Pitching stage, which was held on June 25, 2024. In batch 1, three initiatives have been produced, which are planned to be implemented. One of these initiatives has been successfully realized in 2024, namely the addition of investment features that can be done directly via the Wonder by BNI platform.

2) BINNOVA Batch 2 & 3
   In order to support the BNI Cultural Transformation Program, especially regarding strengthening the culture of innovation, on June 12, 2024, BNI Ideabox was officially launched as a platform to facilitate Hi-Movers in conveying innovation ideas flexibly, anytime and anywhere.

Following up on the launch of BNI Ideabox, BINNOVA batch 2 has been initiated with the theme "Increasing Active Users of New Mobile Banking BNI (wondr by BNI)," and BINNOVA batch 3 with the theme "Increasing Business Process Effectiveness" through the BNI Ideabox tool. During the idea submission period, 178 innovations were submitted to BNI Ideabox. After going through the curation stages by innovation management and the incubation process (customer validation and product validation), 6 (six) innovation teams have been selected to qualify for the Grand Final Pitching stage, which was held on October 15, 2024.

3) BINNOVA Batch 4
   The BNI Innovation Center collaborates with the Data Management & Analytics Division (DMA), which has received support from several Sponsor Directors in holding BINNOVA batch 4 with the theme "Data Quality Innovation Challenge: Quality Data, BNI is on Top". This theme was chosen with the aim of supporting efforts to create higher quality data and optimize BNI's vision, namely to become a financial institution that excels in sustainable service and performance.

During the idea submission period, 45 innovation ideas were obtained from Hi-Movers, which were submitted to BNI Ideabox. After going through the innovation idea curation stage carried out by the BNI Innovation Center, 11 innovation ideas were selected, which passed to the incubation stage, which is the process of developing innovation ideas to ensure the feasibility and readiness of the innovation ideas before they are implemented.

Transparency in Report Submission

BNI is committed to fulfilling the principle of information disclosure, which is very important for the public in making investment decisions. For this reason, BNI routinely submits Disclosure of Information or Material Facts reports to the Financial Services Authority (OJK) and also announces this information to the public.

In 2024, the Corporate Secretary conveyed various information related to BNI to the public through mass media, the IDX website, and the BNI website using Indonesian and English. The Corporate Secretary has also submitted regular and incidental reports to IDX and OJK with the following details:

PERIODIC REPORTS

The following table presents detailed information regarding the Transparency of Report Submission carried out by BNI in 2024:

Report	Number of Report	Intended for	Period
BBNI Securities Holder Registration Monthly Report	12	OJK & IDX	Monthly
Consolidated Financial Statements of the Bank and Subsidiaries (Unaudited)	4	OJK & IDX	Quarterly
Annual Financial Report (Audited)	1	OJK & IDX	Annually
Annual Report (including Corporate Governance Report, Corporate Governance Report of Sharia Business Unit, and Integrated Governance Report of BNI Financial Conglomeration)	1	OJK & IDX	Annually
Sustainability Report	1	OJK & IDX	Annually
Annual Rating Report	1	OJK & IDX	Annually
Annual Report of Parent and Subsidiary Banks (Report of Banks that are part of a business group)	1	OJK	Annually
Related Party List Report	2	OJK	Semi-annual
Annual Public Expose Report	1	IDX	Annually
List of 10 Largest Shareholders Report	4	OJK & IDX	Quarterly
Company Performance Report (Earning Call)	4	OJK & IDX	Quarterly
Announcement Report of Annual General Meeting of Shareholders	1	OJK & IDX	Annually
Annual General Meeting of Shareholders Invitation Report	1	OJK & IDX	Annually
Report on the Implementation of the Annual General Meeting of Shareholders	1	OJK & IDX	Annually
Cash Dividend Payment Implementation Report	1	OJK & IDX	Annually

INCIDENTAL REPORT

Throughout 2024, BNI has made 33 information disclosures in the form of incidental reports to regulators (OJK and/or IDX).

Detailed information regarding the periodic reports and incidental reports above can be viewed and accessed via the BNI website at https://www.bni.co.id/id-id/investor/berita-investor/keterbukaan-information

State Official Wealth Report (LHKPN)

As a tangible commitment to enhancing transparency and fostering a culture free from Corruption, Collusion, and Nepotism (KKN), all members of the Board of Commissioners, Board of Directors, and Structural Officers at BNI are required to submit their Wealth Reports (LHK) in accordance with the company's internal guidelines outlined in the Human Capital Relation Corporate Manual No. Instruction IN/001/HCE/002, dated March 14. This reporting is part of BNI's efforts to implement Good Corporate Governance (GCG) practices and ensure compliance with applicable regulations.

LHKPN POLICY

BNI's internal policies regarding the mechanism for submitting and reporting LHKPN for certain positions reflect compliance with the following legal frameworks:

1. Law No. 28 of 1999 on Clean and Free State Administration from Corruption, Collusion and Nepotism as amended by Law No. 30 of 2002 on the Corruption Eradication Commission;
2. Law No. 30 of 2002 on the Corruption Eradication Commission jo. Law No. 10 of 2015 on the Stipulation of Government Regulation in Lieu of Law No. 1 of 2015 on the Amendment to Law No. 30 of 2002 on the Corruption Eradication Commission jo. Law of the Republic of Indonesia No. 19 of 2019 on the Second Amendment to Law No. 30 of 2002 on the Corruption Eradication Commission;
3. KPK Regulation No. 07 of 2016, as amended by KPK Regulation No. 2 of 2020, on Procedures for Registration, Announcement, and Examination of State Officials' Wealth;
4. Circular Letter of the Minister of State-Owned Enterprises (SOEs) No. SE-12/MBU/10/2021 on the Obligation to Submit State Organizer Asset Reports (LHKPN) for Officials in State-Owned Enterprises.

BNI has established written policies and procedures governing LHKPN submission, designating a responsible unit to manage and administer LHKPN, and instituting mechanisms for imposing sanctions on officials who fail to fulfill their reporting obligations. These measures aim to ensure compliance with regulations and uphold the integrity of BNI personnel in line with GCG principles.

LHKPN REPORTING OBLIGATIONS

In compliance with regulations, the following Structural Officers at BNI are required to submit LHKPN:

1. Commissioners;
2. Directors;
3. Senior Executive Vice Presidents (SEVPs);
4. Division Head/Units/Functional Units;
   In Functional Units without a Head, the reporting obligation applies to positions with at least the rank of Senior Vice President.
5. Regional Manager;
6. General Managers (GMs) of Overseas Office; and
7. Commissioners/Directors in Subsidiaries/ Affiliated Consolidated Companies.

LHKPN MANAGEMENT

The management of LHKPN reporting for BNI Structural Officers is overseen by the following roles:

1. The LHKPN Management Coordinator is a unit that oversees the Human Capital Services function with the following scope of duties:
   a. Coordinating with the Corruption Eradication Commission (KPK) on monitoring, filing, and submission of LHKPN as well as conducting awareness programs on reporting obligations.
   b. Coordinating with the Ministry of SOEs and KPK regarding the management of the LHKPN application.

2. The LHKPN Application Admin is an official who oversees the Human Capital Services function in the field of industrial relations with the following scope of duties:
   a. Submitting data on changes in the positions of state administrators to the KPK.
   b. Coordinating with the KPK on LHKPN management.
3. LHKPN Work Unit Admin is an official who monitors and coordinates with the LHKPN Application Admin. There are 3 (three) Work Unit Admins at BNI, namely:
   a. Corporate Secretary Division;
   b. Subsidiaries Management Division;
   c. International & Financial Institutions Division.

LHKPN REPORTING IN 2024

In 2024, 152 officials at BNI were obligated to submit LHKPN. All of them representing 100% compliance, submitted their State Official Wealth Reports punctually in accordance with prevailing regulations.

(person)

Obligations	Position	2024
Mandatory LHKPN	Board of Commissioners	10
	Board of Directors	12
	Senior Executive Vice President (SEVP)	9
	Division Head/Unit/Functional Unit	69
	Regional Manager	17
	General Manager (GM) of Overseas Branch	6
	Commissioner/Director of a Consolidated Subsidiary/Affiliated Company	29

Bad Corporate Governance Practices

Bad corporate governance practices refer to a series of actions or policies that diverge from the principles of sound corporate governance.

Throughout 2024, BNI is recorded as having neither taken actions nor established policies related to bad corporate governance practices, as detailed in the following table:

Description	Practised in 2024
Reports indicating the company as an environmental polluter	None
Legal cases currently faced by the Bank, subsidiaries, members of the Board of Directors, and/or members of the Board of Commissioners who are currently in office, not disclosed in the Annual Report	None
Non-compliance in fulfilling tax obligations	None
Inconsistencies in the presentation of the Annual Report and Financial Statements with applicable regulations and Financial Accounting Standards	None
Labor and employee-related cases	None
Lack of disclosure of operating segments in the listed company	None
Discrepancies between the hardcopy and softcopy versions of the Annual Report	None

Implementation of Integrated Governance

Integrated Governance for Financial Conglomerates at BNI adheres to the provisions of OJK Regulation No. 18/POJK.03/2014 on the Implementation of Integrated Governance for Financial Conglomerates ("POJK 18/2014") and OJK Circular Letter No. 15/SEOJK.03/2015 on the Implementation of Integrated Governance for Financial Conglomerates ("SEOJK 15/2015").

As the Main Entity within the Financial Conglomerate, BNI implements Integrated Governance to ensure transparency and compliance with regulations. In 2024, the implementation of Integrated Governance encompassed the following aspects:

a. Self-Assessment Reports on the Implementation of Integrated Governance throughout 2024.
b. Structure of BNI Financial Conglomerate.
c. Shareholding Structure within the BNI Financial Conglomerate as of December 2024.
d. Management Structure of the BNI Financial Conglomerate.
e. Core Principles of Integrated Governance for BNI Financial Conglomerate
f. Intra-Group Transaction Policy within BNI Financial Conglomerate.

SELF-ASSESSMENT REPORT ON THE IMPLEMENTATION OF INTEGRATED GOVERNANCE IN 2024

In accordance with applicable regulations, Financial Conglomerates are required to periodically prepare Self-Assessment Reports on Integrated Governance, specifically in June and December. These reports must be submitted to OJK no later than the 15th of the second month following the end of the reporting period, i.e., August 15 and February 15, respectively.

The Self-Assessment of the implementation of Integrated Governance principles in BNI's Financial Conglomerate focuses on three main aspects, namely: Structure, Process, and Outcome. The evaluation centers on seven key assessment factors, which serve as benchmarks for the implementation of Integrated Governance:

1. Execution of the Duties and Responsibilities of the Board of Directors of the Main Entity.
2. Execution of the Duties and Responsibilities of the Board of Commissioners of the Main Entity.
3. Duties and Responsibilities of the Integrated Governance Committee.
4. Duties and Responsibilities of the Integrated Compliance Unit.
5. Duties and Responsibilities of the Integrated Internal Audit Unit.
6. Implementation of Integrated Risk Management.
7. Development and Implementation of Integrated Governance Guidelines.

BNI has prepared a Self-Assessment Report on the implementation of Integrated Governance within its Financial Conglomerate for the 2024 period, as detailed below:

Integrated Governance Self-Assessment Results

Rating		Rating Definition
December 2023	December 2024	
2	2	The Financial Conglomerate is deemed to have implemented Integrated Governance effectively overall. This assessment is evident from the satisfactory application of Integrated Governance principles. Any shortcomings in the implementation of Integrated Governance can be resolved through routine corrective actions carried out by the Main Entity and/or Financial Services Institutions.

Results of Self-Assessment on the seven assessment factors for Integrated Governance Implementation in 2024 is as follow:

1. Board of Directors of the Main Entity
   Under the Integrated Governance structure, all members of BNI's Board of Directors have met the qualifications stipulated by applicable laws and regulations. The implementation of duties and responsibilities of the BNI Board of Directors related to the Integrated Governance process has been carried out and followed up in accordance with the advice and counsel of the BNI Board of Commissioners.

2. Board of Commissioners of the Main Entity
   Within the Integrated Governance structure, all members of BNI's Board of Commissioners meet the qualifications required by prevailing regulations. The Board of Commissioners has fulfilled their oversight duties by holding regular meetings and supervising the implementation of the Board of Directors' responsibilities as the Main Entity. They have also provided recommendations for enhancing the Integrated Governance Guidelines.

3. Integrated Governance Committee
   The Integrated Governance Committee has been established in compliance with applicable regulations. In order to improve the TKT Guidelines, the TKT Committee has provided recommendations to the BNI Board of Commissioners for the improvement of the TKT Guidelines. The evaluation results and outcomes of the TKT Committee Meeting were submitted to the Board of Commissioners through the TKT Committee Task Implementation Report on a quarterly basis.

4. Integrated Compliance Working Unit
   The Integrated Compliance Working Unit (SKKT) is independent and separate from the Operational Working Unit (risk taking unit), and is directly responsible to the Director in charge of the compliance function. SKKT has submitted the results of monitoring, evaluation and suggestions for improvement in the implementation of the compliance function in each Financial Services Institution of the BNI Financial Group periodically (quarterly).

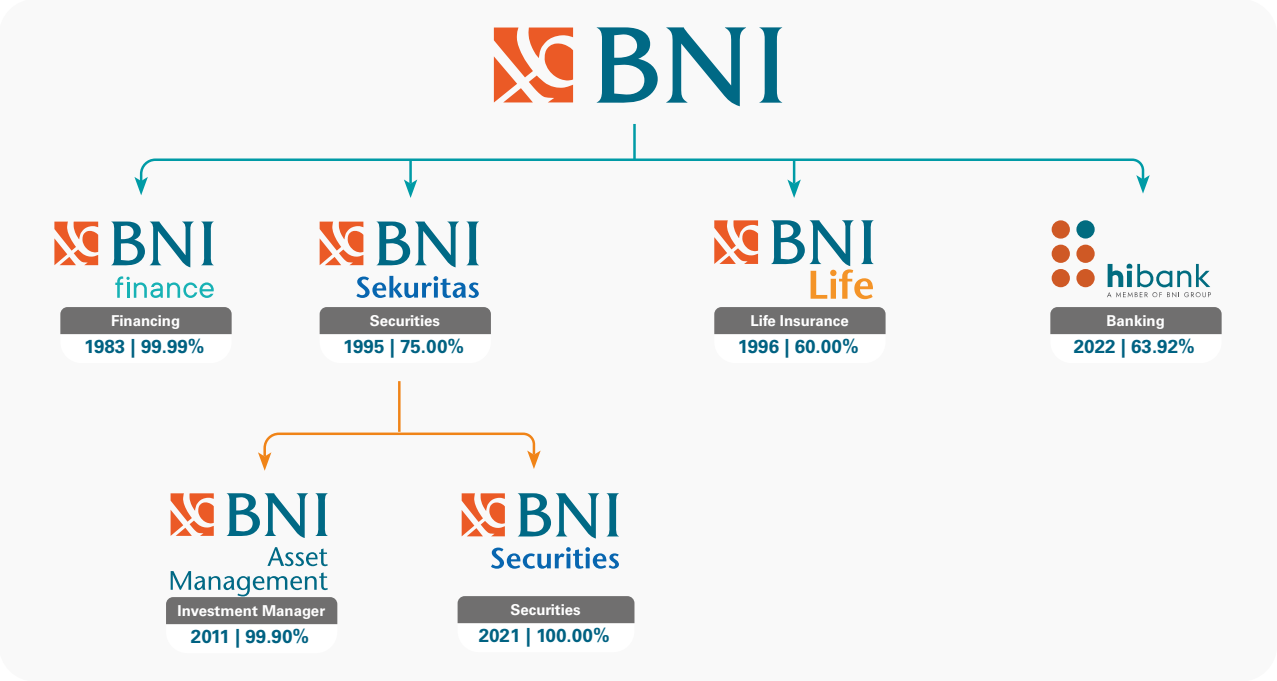
5. Integrated Internal Audit Working Unit
   The Internal Audit Division (IAD) operates independently from BNI's operational units, as well as BNI Financial Conglomerate FSI, and reports directly to President Director of the Main Entity and/or dotted line to the Board of Commissioners of the Primary Entity. IAD as the Integrated Internal Audit Working Unit has monitored the implementation of internal audit in BNI Financial Conglomeration.

6. Integrated Risk Management Implementation
   The appointment of Risk Management Director (Dir RMT) as the Director in charge of the Integrated Risk Management function, where Dir RMT supervises the ERM Division as the Risk Management Work Unit (SKMR) and the Integrated Risk Management Work Unit (SKMRT). Each FSI already has an SKMR and a Director in charge of SKMR. The implementation of Integrated Risk Management of BNI Financial Conglomerate has been implemented in accordance with the characteristics and complexity of the business.

7. Integrated Governance Guidelines
   The BNI Financial Conglomerate Integrated Governance Guidelines have been prepared, reviewed and implemented in accordance with the laws and regulations that contain such as requirements of the Main Entity's Board of Directors and Commissioners, their duties and responsibilities, the Integrated Governance Committee, Integrated Compliance Working Unit, Integrated Internal Audit and Integrated Risk Management Implementation, Subsidiaries Development Division function, Anti Fraud Strategy Implementation monitoring function and coordination mechanism between Integrated Working Units.

STRUCTURE OF BNI FINANCIAL CONGLOMERATE

The structure of BNI's Financial Conglomerate, as the Board of Directors Decree No. DIR/401 dated June 2, 2022, is as follows:

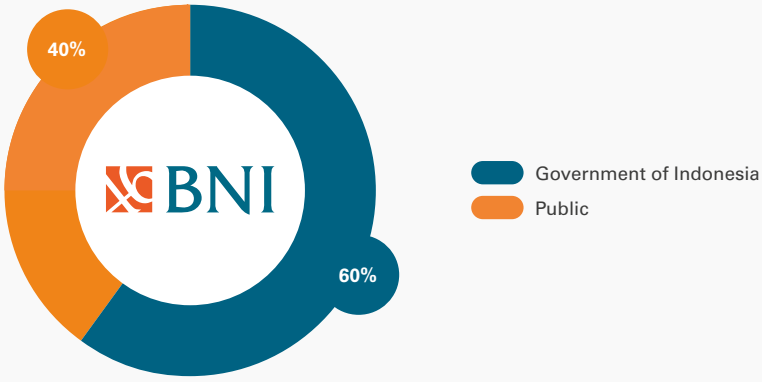


BNI Financial Conglomeration has established an Integrated Governance Committee (TKT) with the composition of the membership as outlined in the Corporate Governance Chapter, this Annual Report, page 839.

Shareholding Structure In BNI Financial Conglomerate

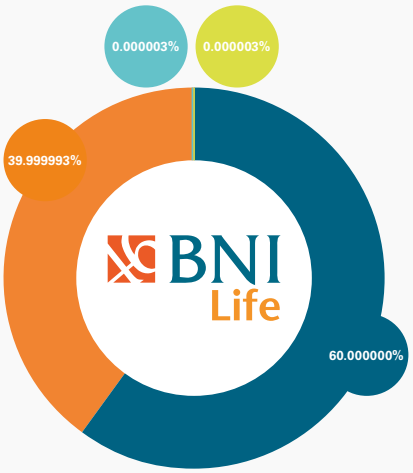
PT Bank Negara Indonesia (Persero) Tbk

The Share Ownership Structure of PT Bank Negara Indonesia (Persero)Tbk as the Main Entity of BNI Financial Conglomerate as of December 31, 2024 is described in the following chart:



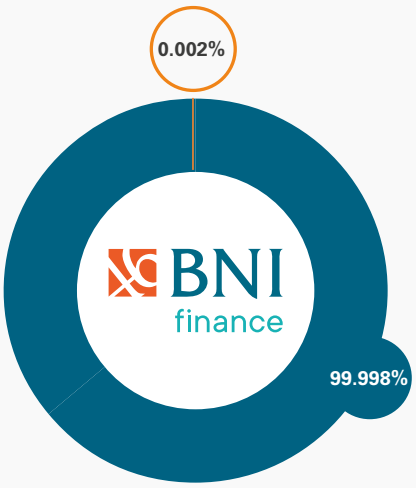
Meanwhile, the Share Ownership Structure of Subsidiary Companies in BNI Financial Conglomeration as of December 31, 2024 is described as follows:

PT BNI Life Insurance



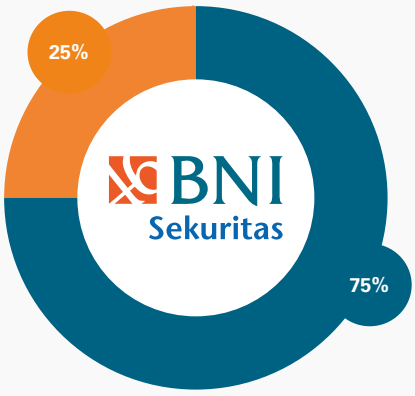
- BNI
- Sumitomo Life Insurance Company
- BNI Employee Welfare Foundation
- Dana Swadharma Foundation

PT BNI Multifinance



- BNI
- PT BNI Multifinance Employee Cooperative

PT BNI Sekuritas



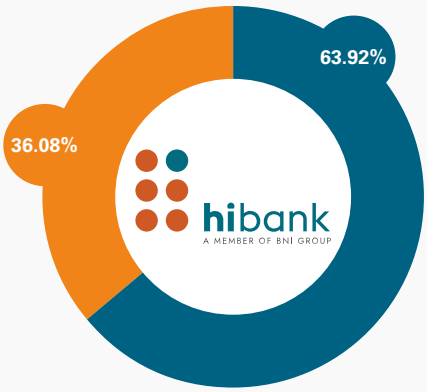
- PT Bank Negara Indoneisa (Persero) Tbk
- SBI Financial Services Co., Ltd

PT BNI Asset Management



- PT BNI Sekuritas
- PT BNI Sekuritas Employee Cooperative

PT Bank Hibank Indonesia



PT Bank Negara Indoneisa (Persero) Tbk
PT Mayora Inti Utama

BNI Securities Pte, Ltd



PT BNI Sekuritas

MANAGEMENT STRUCTURE OF BNI FINANCIAL CONGLOMERATE

PT Bank Negara Indonesia (Persero) Tbk

Name	Position
Board of Commissioners	
Pradjoto	President Commissioner/Independent Commissioner
Pahala Nugraha Mansury	Vice President Commissioner
Sigit Widyawan	Independent Commissioner
Askolani	Commissioner
Asmawi Syam	Independent Commissioner
Mohamad Yusuf Permana	Commissioner
Iman Sugema	Independent Commissioner
Septian Hario Seto	Independent Commissioner
Erwin Rijanto Slamet	Independent Commissioner
Fadlansyah Lubis	Commissioner
Robertus Billitea	Commissioner
Board of Directors	
Royke Tumilaar	President Director
Putrama Wahju Setyawan	Deputy President Director
Novita Widya Anggraini	Finance Director
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director
I Made Sukajaya	Enterprise and Commercial Banking Director
David Pirzada	Risk Management Director
Agung Prabowo	Wholesale and International Banking Director
Ronny Venir	Network and Services Director
Munadi Herlambang[1)]	Institutional Banking Director
Corina Leyla Karnalies	Retail Banking Director
Mucharom	Human Capital and Compliance Director
Toto Prasetio	Technology and Operations Director

[1)] He has served as Director since March 4, 2024, and has not been effective.

PT BNI Life Insurance

Name	Position
Board of Commissioners	
Beby Lolita Indriani	Commissioner
Takafumi Igarashi	Commissioner
Alwi Abdurrahman Shihab	Independent Commissioner
Sharia Supervisory Board	
Agus Haryadi	Chairman of Sharia Supervisory Board
Utang Ranuwijaya	Member of Sharia Supervisory Board
Siti Haniatunnisa	Member of Sharia Supervisory Board
Board of Directors	
Neny Asriany	Director (concurrently Acting President Director)
Agung Turanto Sutarno	Director
Masaaki Fuse	Director
Motoharu Niijima	Director

PT BNI Multifinance

Name	Position
Board of Commissioners	
Suhartono	President Commissioner/Independent Commissioner
Hari Satriyono	Commissioner
Ita Tetralaswati[1)]	Commissioner
Board of Directors	
Yenanto Siem	President Director
Albertus Henditrianto	Director
Legendariah	Director

1) Served as Commissioner since June 24, 2024, in the OJK Fit & Proper Test process.

PT BNI Sekuritas

Name	Position
Board of Commissioners	
Rudy Tandjung	President Commissioner/Independent Commissioner
Kenji Nakanishi	Commissioner
Pancaran Affendi[1)]	Commissioner
Board of Directors	
Vera Ongyono	President Director
Yoga Mulya	Director
Teddy Wishadi[2)]	Director

1) Served as Commissioner since June 25, 2024 and is in the process of Fit and Proper Test OJK
2) Served as Director since June 26, 2023 and in the process of Fit and Proper Test OJK

PT BNI Asset Management

Name	Position
Board of Commissioners	
Eko Priyo Pratomo	President Commissioner/Independent Commissioner
Efrizal	Commissioner
Board of Directors	
Mungki Ariwibowo Adil[1)]	President Director
Ade Yusriansyah	Director
Putut Endro Andanawarih	Director

1)Served as President Director since December 30, 2024

PT Bank Hibank Indonesia

Name	Position
Board of Commissioners	
Rian Eriana Kaslan	President Commissioner
Rufina Tinawati Marianto	Independent Commissioner
Joys Djajanto	Independent Commissioner
Board of Directors	
Jenny Wiriyanto	President Director
Adi Syaf Putra	Director
Andi M. Andries	Director
Ricky Budiono	Director
Prihadiyanto	Director

BNI Securities Pte, Ltd

Name	Position
Chew Wen Yu, Edwin	Executive Director
Dipo Nugroho	Non Executive Director

BASIC PRINCIPLES OF INTEGRATED GOVERNANCE FOR BNI FINANCIAL CONGLOMERATE

To support the continuity of business and operations within the BNI Financial Conglomerate, the basic principles of Integrated Governance are applied. These principles follow the guidelines of the Good Corporate Governance (GCG) Roadmap issued by the Financial Services Authority (OJK) and the ASEAN Corporate Governance Scorecard, which serve as the main reference to ensure the effective and comprehensive application of GCG across all entities within the conglomerate.

In line with this, the basic principles of Integrated Governance for the BNI Financial Conglomerate include:

1. The implementation of Integrated Governance within the BNI Financial Conglomerate aims to create superior performance and add economic value for shareholders and other stakeholders, as well as ensure that the operations of the BNI Financial Conglomerate comply with applicable laws and regulations, business ethics, and Good Corporate Governance principles;
2. Referring to the applicable laws and regulations, Financial Services Institutions (LJK) within the Financial Conglomerate are separate legal entities from BNI, each with its own duties and responsibilities in company management;
3. LJKs within the Financial Conglomerate are independent legal entities under the applicable laws, where BNI serves as the Controlling Shareholder in the BNI Financial Conglomerate;
4. The principles of Integrated Governance apply to LJKs within the Financial Conglomerate, unless otherwise stipulated by applicable laws and regulations. The Articles of Association of LJKs within the Financial Conglomerate that are not in compliance must be amended, taking into account the applicable provisions for each LJK.

INTRA-GROUP TRANSACTION POLICY WITHIN THE BNI FINANCIAL CONGLOMERATE

Definition of Intra-Group Transaction Risk

The Financial Services Authority (OJK) has set several regulations regarding the implementation of integrated risk management in financial conglomerates within the financial services industry. One of these regulations mandates that Financial Conglomerates manage the risks of intra-group transactions. Ownership and control relationships across various financial services sectors can affect the sustainability of Financial Services Institutions (LJK) due to exposure to risks arising, both directly and indirectly, from the activities of entities within a Financial Conglomerate.

Intra-group transaction risk refers to the risks arising from the dependency of one entity, either directly or indirectly, on another entity within a Financial Conglomerate. This dependency may occur in the context of fulfilling obligations, whether through written or unwritten agreements, involving the transfer of funds or not. By understanding this risk, the Financial Conglomerate can more effectively manage risks arising from interactions between entities.

Objectives of Intra-Group Transaction Risk Management

The objectives of Intra-Group Transaction Risk Management within the BNI Financial Conglomerate are as follows:

1. To regulate and monitor the risks of intra-group transactions within the Financial Conglomerate based on prudential principles;
2. To ensure that the integrated risk management process minimizes the potential negative impacts caused by one LJK's direct or indirect dependency on another LJK within the Financial Conglomerate, and the negative impacts on the overall business condition of the BNI Financial Conglomerate.

Principles of Intra-Group Transaction Risk Management

BNI, as the main entity in the application of intra-group transaction risk management within the BNI Financial Conglomerate, must adhere to the following principles:

a. Having sufficient risk management processes for intra-group transactions within the entire Financial Conglomerate;
b. Monitoring intra-group transactions within the Financial Conglomerate and preparing regular reports;
c. Encouraging public disclosure of intra-group transactions;
d. Considering the impact of intra-group transactions on the performance of LJK members within the Financial Conglomerate, both directly and on the overall BNI Financial Conglomerate.

Types of Transactions That May Lead to Intra-Group Transaction Risks

Within the BNI Financial Conglomerate, various types of transactions may pose intra-group transaction risks. Some examples of such transactions include:

a. Cross-ownership between LJKs in the Financial Conglomerate;
b. Centralization of short-term liquidity management within the Financial Conglomerate;
c. Guarantees, loans, and commitments provided or obtained by one LJK from another LJK in the Financial Conglomerate;
d. Exposure to controlling shareholders, including loan exposure and off-balance sheet items such as guarantees and commitments;
e. Purchase or sale of assets between one LJK and another within the Financial Conglomerate;
f. Risk transfer through reinsurance; and
g. Transactions to shift third-party risk exposures among LJKs within the financial conglomerate.

Adequacy of Processes for Identifying, Measuring, Monitoring, and Controlling Risks, and the Risk Management Information System for Intra-Group Transactions

In managing intra-group transaction risks, BNI as the Main Entity implements processes for identifying, measuring, monitoring, and controlling risks associated with all material risk factors in an integrated manner. This process is supported by an adequate intra-group transaction risk management information system, which includes:

1. Intra-Group Transaction Risk Identification
   The identification of intra-group transaction risks is carried out by analyzing the types of products and/or transactions between LJKs within the BNI Financial Conglomerate that could give rise to risks within the conglomerate.
2. Intra-Group Transaction Risk Measurement
   The measurement of intra-group transaction risks aims to determine the risk rating of intra-group transactions within the Financial Conglomerate. BNI, as the main entity, must establish a methodology for measuring intra-group transaction risks and assess the appropriateness of assumptions, data sources, and procedures used.

3. Intra-Group Transaction Risk Monitoring
   Monitoring of intra-group transaction risks involves evaluating exposure to material intra-group transaction risks that may affect the capital condition of the Financial Conglomerate, as well as improving reporting processes when business activities, products, transactions, and material risk factors change. To assess the intra-group material financial relationship between FSIs in the BNI Financial Conglomeration, it is measured based on the value of BNI's financial transactions with FSIs that are members of the BNI Financial Conglomeration, as well as between fellow FSIs within the BNI Financial Conglomeration.
4. Intra-Group Transaction Risk Control
   To implement risk control, BNI, as the Main Entity, ensures that the BNI Financial Conglomerate has control methods in place for intra-group transaction risks that could jeopardize the business continuity of the conglomerate. Intra-group transaction risk controls are implemented by considering:
   a. The composition of inherent risk parameters for intra-group transactions in the integrated risk profile assessment;
   b. Adherence to the arm's length principle (fair transaction terms) for intra-group transactions;
   c. Availability and completeness of intra-group transaction documentation; and
   d. Compliance with legal/regulatory provisions for each intra-group transaction.
5. Intra-Group Transaction Risk Management Information System includes:
   a. Intra-group transaction risk profile reports, which are part of the integrated risk profile report;
   b. Intra-group transaction reports, which include:
      i) Recap of transactions with related parties;
      ii) Important agreements with related parties.

BNI, as the Main Entity, prepares and submits intra-group transaction risk profile reports to OJK semi-annually, as part of the integrated risk profile and intra-group transaction reports for the June and December reporting periods. As of December 31, 2024, all intra-group transactions have been conducted fairly and in compliance with the arm's length principle.

Implementation of Aspects and Principles of Corporate Governance in Accordance with Financial Services Authority Regulations [ACGS C.2.6]

Referring to POJK No. 21/POJK.04/2015 on the Implementation of Corporate Governance Guidelines for Public Companies and SEOJK No. 32/SEOJK.04/2015 on the Corporate Governance Guidelines for Public Companies, BNI adopts five aspects, eight principles, and twenty-five recommendations for good corporate governance practices. The following table provides a more detailed explanation of these aspects and their implementation at BNI in 2024:

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
A.	**Aspect A: Relationship of Public Companies with Shareholders in Guaranteeing Shareholder Rights.**				
1.	**Principle 1: Increasing the Value of Holding General Meetings of Shareholders (GMS).**				
1.1.	Public Companies have technical methods or procedures for collecting votes, both openly and secretly, which prioritize independence and the interests of shareholders.	In the implementation of the 2024 Annual GMS which discussed the Bank's performance for the 2023 Fiscal Year, voting was carried out by taking into account physical votes and through an electronic voting system provided by eASY.KSEI. The vote counting process as the basis for decision making was carried out by PT Datindo Entrycom as the Securities Administration Bureau, and the results were validated by Ashoya Ratam, S.H., M.Kn., a notary in Jakarta. The voting procedure, both openly and secretly, was carried out in accordance with the GMS rules of procedure. In addition, the procedure for calculating the quorum, questions and answers, and the mechanism for making decisions at the meeting have been regulated in the GMS Rules of Procedure and implemented in accordance with OJK Regulation No. 15/POJK.04/2020 concerning the Planning and Implementation of General Meetings of Shareholders of Public Banks, and OJK Regulation No. 16/POJK.04/2020 concerning the Implementation of General Meetings of Shareholders of Public Banks Electronically.	✔		Chapter 7. Corporate Governance, Sub-chapter General Meeting of Shareholders, Page 630-651.
1.2.	All members of the Board of Directors and members of the Board of Commissioners of the Public Company were present at the Annual GMS.	All members of the Board of Directors and members of the Board of Commissioners of the Public Company were present at the 2024 Annual GMS. BNI has submitted the Summary Report of the Minutes of the Annual GMS for the 2023 Financial Year to the OJK through Letter No. CSE/7/1616 dated March 5, 2024.	✔		Chapter 7. Corporate Governance, Sub-chapter General Meeting of Shareholders, Page 630-651.
1.3.	The summary of the minutes of the GMS is available on the Public Company Website for at least 1 (one) year.	The Summary of the Minutes of the 2024 Annual GMS has been published on the official BNI website, which can be accessed via the following link: https://www.bni.co.id/id-id/perseroan/tata-kelola/rups The Summary of the Minutes of the previous year's GMS is also still published on the official BNI website.	✔		

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
2.	**Principle 2: Improving the Quality of Communication of Public Companies with Shareholders or Investors.**				
2.1.	Public Companies have a communication policy with shareholders or investors.	The communication policy with Shareholders or investors is stated in the Investor Relations Guidelines No. IN/41/KMP/001 dated January 26, 2015 and the Company Guidelines No. IN/001/IRN/001 dated October 3, 2024. These guidelines include policies related to investor relations activities, such as analyst meetings, preparation of annual reports, investor meetings, public exposes, and roadshows. The policy also includes strategies, programs, communication implementation times, and guidelines that allow Shareholders or investors to actively participate in communication. The existence of this policy demonstrates the Bank's commitment as a Public Company to implementing transparent and open communication with Shareholders and investors. In 2024, as a form of implementing this policy, the Bank has held analyst meetings, annual reports, and public exposes, and published them on the PT Bursa Efek Indonesia website and the official BNI website.	✔		Chapter 7. Corporate Governance, Sub-chapter Investor Relations, Page 905-908.
2.2.	Public Companies disclose the Public Company's communication policy with shareholders or investors on the Website.				
B.	**Aspect B: Functions and Roles of the Board of Commissioners**				
3.	**Principle 3: Strengthening the Membership and Composition of the Board of Commissioners.**				
3.1.	Determination of the number of members of the Board of Commissioners takes into account the conditions of the Public Company.	As of December 31, 2024, the number of members of the BNI Board of Commissioners is 11 (eleven) people. Determination of the number and composition of the Board of Commissioners has taken into account the conditions, organizational needs and complexity of BNI's business as a Public Company and meets the criteria in accordance with OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 Implementation of Governance for Commercial Banks.	✔		Chapter 7. Corporate Governance, Sub-Chapter Policy on Diversity of the Board of Commissioners and Directors, Page 788-789.
3.2.	The determination of the composition of the Board of Commissioners members takes into account the diversity of expertise, knowledge, and experience required.	The current composition of the Board of Commissioners has reflected adequate diversity, with a combination of various important aspects such as independence, expertise and educational background, diverse work experience, and varying age ranges. This diversity is expected to support more comprehensive and balanced decision-making, and ensure that the Board of Commissioners can carry out its functions effectively in overseeing the Bank's operations. This is in accordance with the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.	✔		Chapter 3. Company Profile Sub-Chapter Profile of the Board of Commissioners, Page 100-111. Chapter 7. Corporate Governance, Sub-Chapter Diversity Policy of the Board of Commissioners and Directors, Page 788-789.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
4.	**Principle 4: Improving the Quality of Implementation of the Duties and Responsibilities of the Board of Commissioners.**				
4.1.	The Board of Commissioners has a self-assessment policy to assess the performance of the Board of Commissioners.	The self-assessment policy is used to assess the performance of the Board of Commissioners based on the achievement of the work program listed in the Board of Commissioners' Work Plan and Budget (RKA). This assessment includes indicators related to the duties and responsibilities of the Board of Commissioners, which are also included in the GCG Self Assessment. The performance assessment of the Board of Commissioners is described through three main indicators, namely advisory on performance, strengthening executive functions, and monitoring compliance. The GCG Self Assessment consists of three main benchmarks: Governance Structure, Governance Process, and Governance Outcome. Governance Structure includes 14 indicators, Governance Process consists of 17 indicators, and Governance Outcome has 6 indicators.	✔		Chapter 7. Corporate Governance, Sub-Chapter Performance Assessment of the Board of Directors and Board of Commissioners, Page 763-767.
4.2.	The self-assessment policy to assess the performance of the Board of Commissioners is disclosed through the Annual Report of the Public Company.	Disclosure of the Self-Assessment policy on the performance of the Board of Commissioners listed in the RKA has been described in the 2024 Annual Report. In addition, BNI has also submitted a report on the results of the GCG Self Assessment related to the duties and responsibilities of the Board of Commissioners to the regulator.	✔		Chapter 7. Corporate Governance, Sub-Chapter on Assessment of the Performance of the Board of Directors and Board of Commissioners, Page 763-767.
4.3.	The Board of Commissioners has a policy regarding the resignation of members of the Board of Commissioners if they are involved in financial crimes.	The policy regarding the resignation of the Board of Commissioners is regulated in the Board of Commissioners Charter. In order to maintain the integrity of the Bank and ensure compliance with the law and GCG principles, BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of involvement of members of the Board of Commissioners in financial crimes. As part of law enforcement efforts, BNI has implemented OJK Regulation No. 8 of 2023 concerning the Implementation of Anti-Money Laundering Programs, Prevention of Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction in the Financial Services Sector.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of Members of the Board of Commissioners and Board of Directors, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter on Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction (APU, PPT, and PPPSPM) Programs, Page 1028-1032.
4.4.	The Board of Commissioners or the Committee that carries out the Nomination and Remuneration function prepares a succession policy in the Nomination process for members of the Board of Directors.	One of the organs of the Board of Commissioners is the Nomination and Remuneration Committee, which functions to carry out nomination duties. This committee assists the Board of Commissioners in assessing the performance of members of the Board of Directors and/or members of the Board of Commissioners based on benchmarks that have been set as evaluation materials. This assessment is carried out by referring to BUMN regulation No. PER-3/MBU/03/2023 of 2023.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Page 810-826.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
C.	**Aspect C: Functions and Roles of the Board of Directors**				
5.	**Principle 5: Strengthening the Membership and Composition of the Board of Directors.**				
5.1.	Determination of the number of members of the Board of Directors takes into account the conditions of the Public Company and the effectiveness of decision-making.	As of December 31, 2024, the number of members of the BNI Board of Directors is 12 (twelve) people. Determination of the number and composition of the Board of Directors has taken into account the conditions, organizational needs and complexity of BNI's business as a Public Company and meets the criteria in accordance with OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 Implementation of Governance for Commercial Banks.	✔		Chapter 7. Corporate Governance, Sub-Chapter Policy on Diversity of the Board of Commissioners and Board of Directors, Page 788-789.
5.2.	The determination of the composition of the Board of Directors members takes into account the diversity of expertise, knowledge, and experience required.	The current composition of the Board of Directors has reflected adequate diversity, with a combination of various important aspects such as independence, background expertise and education, diverse work experience, and varying age ranges. This diversity is expected to support more comprehensive and balanced decision-making, and ensure that the Board of Commissioners can carry out its functions effectively in overseeing the running of the company. This is in accordance with the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.	✔		Chapter 3. Company Profile Sub-Chapter Board of Directors Profile, Page 114-125. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners and Board of Directors Diversity Policy, Page 788-789.
5.3.	Members of the Board of Directors who oversee the accounting or finance sector have expertise and/or knowledge in the field of accounting.	The Director of Finance, Novita Widya Anggraini, has an educational background in accounting economics and throughout 2024 has improved her competence in this field.	✔		
6.	**Principle 6: Improving the Quality of Implementation of Duties and Responsibilities of the Board of Directors.**				
6.1.	The Board of Directors has its own self-assessment policy to assess the performance of the Board of Directors.	The Board of Directors' performance assessment policy is regulated in the Guiding Principle Key Performance Indicator (KPI) of the Board of Directors. This performance measurement includes several KPIs that are assessed collegially for all Directors, both in quantitative and qualitative forms. The assessment involves several factors, such as market capitalization, profit, market share, and leadership. The Nomination and Remuneration Committee has conducted an evaluation and provided recommendations to the Board of Commissioners regarding the nomination and remuneration system or policy for Commissioners, Directors, executive officers, and employees as a whole.	✔		Chapter 7. Corporate Governance, Sub-Chapter Assessment of the Performance of the Board of Directors and Board of Commissioners, Page 763-767.
6.2.	The self-assessment policy for assessing the performance of the Board of Directors is disclosed through the annual report of the Public Company.	In 2024, the performance assessment of the Board of Directors has been disclosed in the Annual Report, which can be accessed by Shareholders, investors, and other stakeholders through the official BNI website. This information is very useful for providing assurance to Shareholders and investors that the management of the company continues to be carried out in a better direction.	✔		Chapter 7. Corporate Governance, Sub-Chapter Assessment of the Performance of the Board of Directors and Board of Commissioners, Page 763-767.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
6.3.	The Board of Directors has a policy regarding the resignation of members of the Board of Directors if they are involved in financial crimes.	BNI has a clear policy regarding the resignation of members of the Board of Directors and will take firm action if financial crimes occur. This policy is regulated in the Articles of Association and the Board of Directors Charter. In order to maintain the integrity of the Bank and ensure compliance with the law and GCG principles, BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of involvement of members of the Board of Directors in financial crimes. As part of law enforcement efforts, BNI has implemented OJK Regulation No. 8 of 2023 concerning the Implementation of Anti-Money Laundering Programs, Prevention of Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction Funding in the Financial Services Sector.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Page 703-762. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter on Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction (APU, PPT, and PPPSPM) Programs, Page 1028-1032.
D.	**Aspect D: Stakeholder Participation**				
7.	**Principle 7: Enhancing Corporate Governance Aspects through Stakeholder Participation.**				
7.1.	Public Companies have policies to prevent insider trading.	BNI has a comprehensive policy to prevent insider trading, which is outlined in the Company Guidelines (e-PP). This policy provides clear guidance to all employees, including members of the Board of Directors and Board of Commissioners, regarding the use and disclosure of unpublished insider information. In an effort to prevent insider trading practices, BNI also establishes reporting procedures for employees who suspect violations related to such information. To support the implementation of this policy, BNI periodically holds training so that employees understand and comply with applicable provisions. With these steps, BNI aims to create a culture of transparency and accountability, as well as increase public trust in the integrity of financial institutions in managing sensitive information.	✔		Chapter 7. Corporate Governance, Sub-Chapter Insider Trading and Conflict of Interest Policy, 1059-1060.
7.2.	Public Company has an anti-corruption and anti-fraud policy.	In its operational activities, BNI always complies with OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategy for Financial Services Institutions, as well as Bank Indonesia Circular Letter No. 13/28/DPNP dated December 9, 2011 concerning the Implementation of Anti-Fraud Strategy. BNI is committed to fostering a culture and concern for anti-fraud throughout the organization. The implementation of anti-fraud policies and strategies is carried out through the implementation of the No Fraud for Our Bank principle.	✔		Chapter 7. Corporate Governance, Sub-Chapter Internal Fraud, Page 1062-1063. Chapter 7. Corporate Governance, Sub-Chapter Anti-Corruption Policy, Page 1033-1034

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
		To ensure that business activities are free from corruption, bribery, and fraud, BNI has formed several organizations, such as the Gratification Control Unit (UPG), the Anti-Fraud Unit, and the Anti-Fraud Committee. In addition, BNI also implements strict policies and procedures to enforce the principles of anti-corruption, anti-bribery, and anti-fraud, including the signing of an integrity pact by employees, the Board of Directors, and the Board of Commissioners every year, the Declaration of Gratification and Anti-Bribery periodically, and ISO 37001:2016 Certification on the Anti-Bribery Management System (SMAP). To measure the success of this compliance culture, the Compliance Division has developed a tool called the Compliance Index (CIX).			
7.3.	Public Companies have policies on supplier or vendor selection and capacity building.	BNI has a supplier or vendor selection and capacity building policy outlined in the Company Guidelines (e-PP) Procurement No. IN/156/PGV/017. This policy covers procurement procedures, including methods and process flows, and is applied consistently in every procurement of goods and/or services. This policy serves as a guideline for all employees in carrying out the procurement process. BNI requires that providers of goods and/or services required have been registered in the manual system or e-Procurement application. In addition, the procurement winner notification process is carried out transparently to ensure accountability.	✔		Chapter 7. Corporate Governance, Sub-Chapter Procurement Policy, Page 1039-1043.
7.4.	Public Companies have policies regarding the fulfillment of creditor rights.	Policies related to creditor rights at BNI are regulated through an agreement agreed between BNI and creditors. This agreement clearly states the rights and obligations of each party, including BNI's obligation to fulfill creditor rights. BNI is committed to providing transparent, accurate, and timely information, both regarding requests and use of loans. In addition, BNI is also obliged to maintain financial ratios, such as Current Ratio, Debt to Equity Ratio (DER), and Debt Service Ratio, in accordance with the agreed provisions. Annual audited financial reports are also submitted to creditors within a specified time period.	✔		Chapter 7. Corporate Governance, Sub-Chapter Protection of Creditor Rights, Page 1053.
7.5.	Public Companies have a whistleblowing system policy.	The management of the Whistleblowing System (WBS) at BNI, known as "WBS to CEO," is a manifestation of the Bank's commitment to creating a clean and integrity-based work environment. This system encourages the active participation of BNI Hi-Movers to report any violations that occur within the Bank. Violation reports through WBS can be submitted through various channels, such as telephone, email, letter, or website, thus facilitating access and ensuring the confidentiality of the reporter.	✔		Chapter 7. Corporate Governance, Sub-Chapter Violation Reporting System (Whistleblowing System), Page 1080-1083.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2024 Annual Report
			Complied	Not Yet Complied	
7.6.	Public Companies have a policy of providing long-term incentives to Directors and employees.	BNI implements a policy of providing long-term performance-based compensation as a form of appreciation to management and employees who make significant contributions. This policy is realized through a stock ownership scheme, namely the Management Stock Ownership Program (MSOP) and the Employee Stock Ownership Program (ESOP). This policy is expected to encourage sustainable performance improvements and align employee interests with the Bank's goals. The provision of long-term compensation for members of the Board of Directors and Independent Board of Commissioners in the form of MSOP is guided by OJK Regulation No. 45/POJK.03/2015 concerning Remuneration Governance for Commercial Banks, as well as Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises. In addition, the Employee Stock Allocation (ESA) Program provides an opportunity for employees who meet certain criteria to own shares, in accordance with the provisions stated in the Program Implementation Instructions.	✔		Chapter 7. Corporate Governance, Sub-Chapter Performance-Based Long-Term Compensation Policy, Page 1064-1069.
E.	**Aspect E: Information Disclosure**				
8.	**Principle 8: Improve the Implementation of Information Disclosure.**				
8.1.	Public Companies utilize information technology more widely in addition to Websites as a medium for information disclosure.	In addition to the website, BNI also utilizes various information technologies and social media, such as email, BNI Menyapa, X, Instagram, and TikTok as a means of communication and information dissemination. This information disclosure effort includes not only that required by laws and regulations, but also other information that is considered useful for Shareholders and investors related to BNI's status as a Public Company.	✔		Chapter 7. Corporate Governance, Sub-Chapter Access to Company Information and Data, Page 990-1026.
8.2.	The Public Company Annual Report discloses the ultimate beneficial owner in the Public Company's share ownership of at least 5% (five percent), in addition to the disclosure of the ultimate beneficial owner in the Public Company's share ownership through major and controlling shareholders.	In the 2024 Annual Report, BNI discloses information regarding the ultimate beneficial owner in share ownership, including individuals or entities that own at least 5% (five percent) of the total shares. This disclosure includes major and controlling shareholders, as well as share ownership by the Board of Directors and Board of Commissioners.	✔		Bab 3. Profil Chapter 3. Company Profile Sub-Chapter Structure and Composition of Shareholders, Page 168-173. Chapter 3. Company Profile Sub-Chapter Information on the Company's Major and Controlling Shareholders, Page 174. Chapter 7. Corporate Governance, Sub-Chapter Policy on Disclosure of Information on Share Ownership of the Board of Commissioners and Directors and Its Implementation, Page 1070-1079.

Implementation of The Indonesian Corporate Governance Guidelines (PUGKI) [ACGS C.2.6]

In 2024, BNI has implemented the principles and recommendations outlined in the Indonesian Corporate Governance Guidelines (PUGKI) issued by the National Committee on Governance Policy (KNKG. In line with BNI's commitment to realize the 4 (four) pillars of corporate governance, namely ethical behavior, accountability, transparency and sustainability, BNI also continues to strive to implement 8 (eight) principles of Indonesian corporate governance. More detailed information on this implementation can be found in the following table:

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.	**Principle 1: Roles and Responsibilities of the Board of Directors and Board of Commissioners**				
1.1	**Roles and Responsibilities of the Board of Directors**				
1.1.1	To achieve the creation of sustainable value, the Board of Directors carries out its leadership role and strives to achieve the following governance outcomes: a. competitive and focused on long-term performance; b. ethical and responsible in conducting business; c. contributes positively to society and the environment; and d. capable of resilience and growth (corporate resilience).	In carrying out its duties and functions, the Board of Directors focuses on long-term performance, upholds business ethics, takes responsibility for the environment and society, and consistently makes improvements for sustainable growth.	✔		Chapter 7 Corporate Governance, Sub-chapter Board of Directors, Page 703-762.
1.1.2	The Board of Directors must ensure that the mission, vision, goals, objectives, strategies, and annual and medium-term corporate plans are consistent with long-term objectives, by effectively utilizing innovation and technology.	The Board of Directors ensures that the corporate vision and mission align with the Bank's strategic plan and long-term objectives, by effectively utilizing innovation and technology. A strong commitment to developing technology infrastructure and digital innovation is a key step in supporting the achievement of these goals. By considering stakeholder expectations, innovation is placed at the core of strategy and operational oversight. The Board of Directors also encourages continuous innovation, including the development of business models, new products, new services, and collaboration with strategic partners.	✔		Chapter 3. Company Profile, Sub-chapter Vision, Mission and Corporate Culture, Page 86-89. Chapter 7. Corporate Governance, Sub-Chapter of the Bank's Strategic Plan, Page 1084-1090. Chapter 7 Corporate Governance, Sub-Chapter Reporting Integrity and Information Technology System, Page 1058.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.1.3	The Board of Directors ensures that the corporation implements appropriate and effective risk management and internal control systems that align with the corporate vision, mission, goals, objectives, and strategies, and comply with applicable laws and standards.	The Board of Directors has ensured that the corporation applies appropriate and effective risk management and internal control systems, aligned with the vision, mission, and strategic plan. The implementation of risk management and internal control systems is carried out effectively, proactively, and with a forward-looking approach, in accordance with applicable laws and standards. This step aims to support the achievement of sustainable performance and enhance competitiveness.			Chapter 7. Corporate Governance, Internal Control System Sub-Chapter, Page 938-945. Chapter 7. Corporate Governance, Sub-Chapter of Risk Management System, Page 946-970.
1.1.4	The Board of Directors ensures the integrity of the corporation's accounting and financial reporting systems and the timely and accurate disclosure of all material information regarding the corporation.	The Board guarantees the integrity of the corporation's accounting and financial reporting systems and ensures the timely and accurate disclosure of all material information regarding the Bank as part of the Bank's risk management implementation. The Board also ensures that each individual involved in the preparation and disclosure of information possesses relevant knowledge, skills, and experience, as reflected in certifications from reputable institutions, and ensures the availability of adequate resources. In approving information disclosure, including periodic financial reports, the Board considers the effectiveness of the internal control system, the opinion of the external auditor, and the opinions of the Audit Committee, as well as consistency with the Bank's goals and strategies. The results of the review of the Quarterly Financial Statements are published along with the report, providing valuable information for investors and analysts to assess the Bank's financial performance.	✔		Chapter 7. Corporate Governance, Internal Control System Sub-Chapter, Page 938-945. Chapter 7. Corporate Governance, Sub-Chapter Transparency of Report Submission, Page 1091.
1.1.5	The Board of Directors ensures that the sustainability report has been properly prepared.	The Board ensures the implementation of sustainability principles and the preparation of the sustainability report in accordance with applicable laws and regulations and standards. This report is prepared based on a reporting framework that takes into account the size and complexity of the corporation, and meets national and/or global standards. Therefore, the sustainability report reflects the corporation's practices that support the creation of sustainable value.	✔		Chapter 9. ESG Commitments, ESG Index Sub-Chapter: Summary of Practices BNI Sustainability Practices Summary, Page 1192-1197.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.1.6	The Board of Directors establishes a framework for corporate information technology (IT) governance that aligns with the corporation's business needs and priorities, drives business opportunities and performance, strengthens risk management, and supports the corporation's goals and strategies.	The Board consistently develops and updates the IT governance framework to align with the Bank's business needs and priorities. IT resource allocation policies are implemented to ensure that investments and resource allocations are optimal and adequate. The implementation of IT governance is realized through aligning the IT Strategic Plan with the Bank's business strategy, optimizing resources, effective use of IT, performance measurement, and applying risk management in compliance with applicable regulations. Furthermore, the Board ensures that the Bank's risk management covers IT risks, and IT security policies and procedures are implemented to safeguard the security and confidentiality of data.	✔		Chapter 5. Business Support Functions, Sub-Chapter Information Technology, Page 444-450. Chapter 7 Corporate Governance, Sub-Chapter Reporting Integrity and Information Technology System, Page 1058.
1.1.7	For corporations operating based on Sharia principles, the Board of Directors must ensure the authority and availability of adequate supporting devices so that the Sharia Supervisory Board can perform its role effectively.	As of the end of 2024, BNI does not conduct business activities based on Sharia principles. Therefore, this provision is not relevant to BNI.			
1.1.8	The Board of Directors' Charter is periodically reviewed. The Charter includes, among other things, the division of roles for each Director, which can be arranged in the Board of Directors' Charter or by a Board of Directors' decision letter.	The Board of Directors' Charter is reviewed regularly to ensure its relevance and alignment with the latest developments in governance practices. This review process includes an evaluation of the duties and authority of each Director, as well as necessary adjustments to improve the Bank's operational effectiveness and efficiency. Additionally, this guideline serves as a reference for Board members in carrying out their responsibilities, thereby promoting transparent and accountable decision-making practices.	✔		Chapter 7 Corporate Governance, Sub-Chapter Board of Directors, Page 703-762.
1.1.9	The Board of Directors has a policy regarding the resignation of Board members if they are involved in financial crimes and are proven to have committed wrongdoing.	BNI has a clear policy regarding the resignation of Board members. This policy is written and outlined in the Articles of Association and the Board of Directors' Charter. To maintain integrity and ensure compliance with the law and principles of GCG, BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of Board members' involvement in financial crimes.	✔		Chapter 7. Corporate Governance, Sub-Chapter of Board of Directors, Page 703-762. Chapter 7. Corporate Governance, Sub-Chapter of Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Proliferation of Weapons of Mass Destruction (AML/CFT and PPPSPM) Program, Page 1028-1032.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
		BNI has also implemented POJK No. 8 of 2023 regarding the Implementation of the APU PPT and PPPSPM Programs in the Financial Services Sector. This commitment is reflected in all operational activities, including the identification, monitoring, and reporting of suspicious transactions.			
1.2	**Role and Responsibilities of the Board of Commissioners**				
1.2.1	The Board of Commissioners conducts an objective and independent annual formal evaluation to determine the effectiveness of the Board of Directors and each individual Director.	The performance assessment of the Board of Directors, including the President Director of the Bank, is conducted periodically based on the parameters set in the Board of Directors' Key Performance Indicators (KPIs), both collectively and individually. The calculation of the achievement of the Board of Directors' KPIs will be reviewed by the Public Accounting Firm (KAP) that audits the Bank's financial statements. The results of this review are then evaluated by the Board of Commissioners, taking into account recommendations from the Nomination and Remuneration Committee. Subsequently, the Board of Commissioners' evaluation results of the Board of Directors' performance are reported to the Ministry of State-Owned Enterprises as the controlling shareholder of the Bank.	✔		Chapter 7. Corporate Governance, Sub-Chapter Performance Assessment of the Board of Directors and the Board of Commissioners, Page 763-767.
1.2.2	The Board of Commissioners, by taking into account the consideration of the Nomination and Remuneration Committee, is responsible for determining the performance evaluation criteria and assessing the performance of the President Director and other Board members.				
1.3	**Peran dan Tanggung Jawab Dewan Komisaris**				
1.3.1	The Board of Commissioners reviews the corporate strategy at least annually and approves the mission, vision, and strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves the corporation's business plan, long-term financial plan, and short-term financial plan. The Board of Commissioners provides advice and monitors the Board of Directors' management of its implementation. The Board of Directors and the Board of Commissioners are involved in decisions that are critical to the corporation, as outlined in the corporation's articles of association.	The Board of Commissioners reviews the corporate strategy annually by approving the Bank's Business Plan (RBB), the Corporate Work Plan and Budget (RKAP), as well as revisions to the RBB and RKAP. Additionally, the Board of Commissioners provides advice and counsel and monitors the implementation of policies, their implementation, and the performance of the Bank, which is the responsibility of the Board of Directors. The supervisory function of the Board of Commissioners is carried out regularly through Board of Commissioners' meetings, which invite the Board of Directors every four months. Furthermore, the Board of Commissioners also prepares the RBB Supervision Report, which is submitted to the relevant authorities every semester.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.3.2	The types of decisions that require the approval of the Board of Commissioners must be disclosed in the annual report.	BNI's Articles of Association stipulate that the Board of Commissioners has the obligation to provide written approval for legal actions taken by the Board of Directors. This approval must be made in accordance with the provisions set out in BNI's Articles of Association, with due observance of the prevailing laws and regulations as well as provisions in the Capital Market. Disclosure of the type of decision requiring Board of Commissioners' approval has also been disclosed in the Annual Report, which among others states that the Board of Commissioners is authorized to approve matters requiring Board of Commissioners' approval based on the prevailing laws and regulations and the Company's Articles of Association, including the Bank's Business Plan, Corporate Budget Work Plan, Corporate Plan, Recovery Plan, Internal Audit Annual Audit Plan, and Sustainable Finance Action Plan. Information related to this matter has been disclosed in the 2024 Annual Report.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, in the discussion entitled Decisions of the Board of Directors Requiring Board of Commissioners Approval, Page 692-694.
1.3.3	Taking into account the recommendations of the Nomination and Remuneration Committee, the Board of Commissioners proposes to, and for decision by, the GMS the appointment and/or dismissal of members of the Board of Directors and the Board of Commissioners. In making the proposal, the Board of Commissioners considers diversity, non-discriminatory elements, and provides equal opportunities without distinguishing between ethnicity, religion, race, inter-group relations, and gender. The Board of Commissioners ensures that the process of nominating and selecting members of the Board of Directors and the Board of Commissioners is formal and transparent.	The Board of Commissioners ensures that the process of nominating and selecting members of the Board of Directors and the Board of Commissioners is formal and transparent. The nomination and selection procedures follow the applicable regulatory provisions. The procedure begins with a meeting of the Nomination and Remuneration Committee to provide recommendations to the Board of Commissioners regarding the appointment and/or dismissal of members of the Board of Directors and the Board of Commissioners. After that, the Board of Commissioners proposes it to the shareholders for decision at the GMS. The Board of Commissioners has considered diversity, non-discriminatory elements, and provides equal opportunities without distinction based on ethnicity, religion, race, inter-group relations, and gender.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of Directors and Board of Commissioners, Page 768-787.
1.3.4	The Board of Commissioners or the committee performing the nomination function develops a succession policy in the nomination process for members of the Board of Directors. Each year, the Board of Commissioners reviews the implementation report of the development and succession plan submitted by the President Director.	The Nomination and Remuneration Committee develops the Succession Policy in the nomination process for members of the Board of Directors, which is then recommended to the Board of Commissioners. Each year, the Board of Commissioners reviews the implementation report of the development and succession plan.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, in the discussion entitled Directors' Succession Policy, Page 772.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.3.5	The Board of Commissioners: a) Proposes to the GMS, which may be preceded by a proposal from the committee performing the remuneration function, the amount of remuneration for members of the Board of Directors and the Board of Commissioners that aligns with the sustainable development of the corporation and the long-term interests of the corporation and shareholders; b) Periodically reviews the remuneration system for the Board of Directors and the Board of Commissioners.	The Nomination and Remuneration Committee, responsible for the remuneration function, proposes the remuneration amount for members of the Board of Directors and the Board of Commissioners. This proposal is made considering the sustainable development as well as the long-term interests of the Bank and shareholders. The Board of Commissioners periodically reviews the remuneration policy and procedures to ensure their alignment with current conditions and applicable regulations.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, in the discussion entitled Directors' Succession Policy, Page 768-787.
1.3.6	The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation, and proposes changes if necessary.	The Board of Commissioners is responsible for overseeing the effectiveness of corporate governance policies and their implementation across all levels of the organization, ensuring that the policies applied align with the principles of good governance and applicable regulations. With the support of all the Committees of the Board of Commissioners, the Board of Commissioners performs its oversight function through coordination with the Board of Directors to review and evaluate the implementation of policies. If necessary, the Board of Commissioners proposes changes or adjustments to improve the quality of governance, including the implementation of governance at the Bank and Subsidiaries within the BNI Financial Conglomerate, in accordance with the Integrated Governance concept mandated by OJK Regulations.	✔		Chapter 7. Corporate Governance, Sub-Chapter Integrated Governance Committee, Page 839-857.
1.3.7	The Board of Commissioners monitors and directs the corporation to implement appropriate and effective risk management and internal control systems that align with the corporation's goals, objectives, and strategies, and comply with applicable regulations, code of conduct, and standards.	The Board of Commissioners, through the Risk Monitoring Committee, has carried out monitoring and oversight, which includes providing advice and guidance to the Board of Directors on the implementation of Risk Management and Internal Control Systems at BNI. The Board of Commissioners periodically reviews and approves the applicable risk appetite. Through the Risk Monitoring Committee, the Board of Commissioners monitors and provides input to ensure that key risks are identified, considering both internal and external factors. Additionally, the Board of Commissioners ensures that the impact and likelihood of risks have been assessed and that appropriate mitigation strategies and plans are in place. Periodically, the Board of Commissioners also monitors the effectiveness of risk management and internal control systems.	✔		Chapter 7 Corporate Governance, Sub-Chapter Risk Monitoring Committee, Page 826-839.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.3.8	The Board of Commissioners supervises and directs the achievement of integrity in the corporation's accounting and financial reporting systems, as well as the independence of internal and external audit functions.	The Board of Commissioners has discussed with the Board of Directors the appointment of the Public Accounting Firm that will function as the External Auditor to audit BNI's 2024 Annual Financial Statements and other reports. This discussion also covers the audit plan for the following year and annual consultations, with the aim of achieving integrity in accounting and financial reporting systems, as well as ensuring the independence of both internal and external audit functions. Before approving the financial statements, the Board of Commissioners receives a statement from the President Director and Finance Director that the entity's financial records have been properly managed. The financial statements have also been prepared in accordance with applicable accounting standards and fairly present the corporation's financial position and performance.	✔		Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Page 792-810.
1.3.9	The Board of Commissioners monitors, reviews, and approves the corporation's annual report and sustainability report, ensuring their integrity, and supervises the corporation's disclosure and communication processes.	The Board of Commissioners has monitored, reviewed, and approved BNI's 2024 Annual Report and Sustainability Report, ensuring their integrity. Additionally, the Board of Commissioners supervises the corporation's disclosure and communication processes, including ensuring that information related to the Board of Commissioners is included in the Annual Report. Thus, the disclosure of governance practices in the Annual Report is ensured to have been properly implemented during the 2024 fiscal year.	✔		Chapter 2. Management Report, Board of Commissioners' Report Sub-Chapter, Page 45-53. Chapter 2. Management Report, Sub-Chapter of Statement of Members of the Board of Commissioners on their Responsibilities for the 2024 Annual Report, Page 76-77.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.3.10	The Board of Commissioners' Charter is periodically reviewed.	The Board of Commissioners has a Charter that includes various provisions, such as the Code of Conduct for Board of Commissioners meetings and joint meetings with the Board of Directors, and serves as the primary reference for carrying out the Board's duties and functions. Additionally, the supporting committees of the Board of Commissioners each have their own Committee Charter, which guides them in performing their duties and responsibilities. All of these guidelines are reviewed periodically and adjusted to comply with applicable laws and regulations before being approved by the Board of Commissioners. In 2024, the Board of Commissioners conducted a review and ensured that these guidelines comply with the relevant legal provisions.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698. Chapter 7. Corporate Governance, Audit Committee Sub-Chapter, Page 792-810. Chapter 7. Corporate Governance, Remuneration and Nomination Committee Sub-Chapter, Page 810-826. Chapter 7. Corporate Governance, Sub-Chapter of Risk Monitoring Committee, Page 826-839. Chapter 7. Corporate Governance, Sub-Chapter of Integrated Governance Committee, Page 839-857.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.3.11	The Board of Commissioners has a policy regarding the resignation of Board members if they are involved in financial crimes and proven to have committed wrongdoing.	The policy on the resignation of the Board of Commissioners is regulated in the Articles of Association and the Board of Commissioners' Charter. To maintain the integrity of the Bank and ensure compliance with the law as well as the principles of Good Corporate Governance (GCG), BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of a Board member's involvement in financial crimes. As part of the law enforcement efforts, BNI has implemented OJK Regulation No. 8 of 2023 concerning the Application of Anti-Money Laundering (APU) and Prevention of Terrorism Financing (PPT) Programs, and the Prevention of Financial Services Sector Money Laundering (PPPSPM).	✔		Chapter 7. Corporate Governance, Sub-Chapter of Board of Commissioners, Page 652-698. Chapter 7. Corporate Governance, Sub-Chapter of Nomination and Remuneration of Members of the Board of Commissioners and Directors, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter of Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Proliferation of Weapons of Mass Destruction (AML, CFT, and PPPSPM) Program, Page 1028-1032.
1.3.12	Independent Commissioners are highly expected to contribute to honest, objective, active, and constructive discussions in Board of Commissioners meetings.	BNI ensures that all Independent Commissioners serving in 2024 have no financial, managerial, ownership, and/or family relationships with members of the Board of Directors, other members of the Board of Commissioners, controlling shareholders, or the Bank. This independence condition reflects the objectivity of Independent Commissioners in carrying out their duties, as well as their active, objective, and constructive roles in executing their functions. The appointment and dismissal of BNI's Independent Commissioners have met the criteria and followed the procedures set forth in the applicable laws and regulations. As such, Independent Commissioners are ensured to perform their duties independently.	✔		Chapter 7. Corporate Governance, Sub-Chapter Independent Commissioner, Page 699-702.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.3.13	The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner fosters a culture of openness and constructive dialogue that allows various viewpoints to be expressed, including coordinating the setting of appropriate board meeting agendas and ensuring sufficient time is available to discuss all items. Additionally, there must be opportunities for the Board of Commissioners to meet with the Board of Directors and senior management.	The President Commissioner has optimally performed his role, both as the coordinator of the Board of Commissioners in ensuring the effectiveness of its duties and responsibilities, and in fulfilling his role as the Chair of the Integrated Governance Committee and the Nomination and Remuneration Committee. The active role of the President Commissioner is evident in leading the Board of Commissioners' meetings according to the agenda that must be discussed, including in the decision-making process in a collegial manner. Furthermore, the President Commissioner coordinates the division of supervisory roles among the members of the Board of Commissioners, leads meetings, and represents the Board of Commissioners in dealings with external parties.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698.
1.4	**Establisment of the Committee**				
1.4.1	The corporation has committees under the Board of Commissioners, at a minimum consisting of: the Audit Committee, the Nomination and Remuneration Committee, and the Risk Management Monitoring Committee.	To support the implementation of supervisory duties and functions, the Board of Commissioners has established committees under the Board of Commissioners, consisting of the Nomination and Remuneration Committee, the Integrated Governance Committee, the Risk Monitoring Committee, and the Audit Committee.	✔		Chapter 7. Corporate Governance, Sub-Chapter Supporting Organ of the Board of Commissioners, Page 792-857.
1.4.2	The Board of Commissioners ensures that all members of the Audit Committee are independent, and that other committees established by the Board of Commissioners are predominantly composed of independent members. Furthermore, all committee members possess the necessary competence, commitment, and authority to perform their roles effectively and independently.	The Board of Commissioners ensures that all members of the Audit Committee, consisting of Independent Commissioners and Independent Parties (Non-Commissioners), carry out their duties and responsibilities independently. All members of the Audit Committee are confirmed to have the required competence and capabilities to meet the needs of the Audit Committee's tasks. The Audit Committee has a Committee Charter that serves as a guideline for carrying out its duties. The Audit Committee Charter outlines various provisions, including: Independence Criteria, Duties and Responsibilities, and the Authority of the Audit Committee. The Audit Committee has several authorities, including the right to obtain information, meet with relevant parties in connection with its duties (with or without the presence of management), and seek advice from independent external consultants/experts if necessary.	✔		Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Page 792-810.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.4.3	To ensure that the monitoring of the Audit Committee's duties is carried out objectively and independently, the President Commissioner shall not serve as the Chairman of the Audit Committee, except in extraordinary circumstances that must be explained in the annual report.	The Board of Commissioners ensures that the President Commissioner does not hold the position of Chairman of the Audit Committee, in order to maintain independence and objectivity in the execution of the supervisory function. In 2024, the position of Chairman of the Audit Committee was held by an Independent Commissioner with adequate competence and experience, enabling them to carry out the oversight duties effectively and in accordance with GCG principles.	✔		Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Page 792-810.
1.5	**Performance Assessment – Board of Commissioners and its Members**				
1.5.1	The Board of Commissioners conducts an objective annual formal evaluation to determine the effectiveness of the Board, its committees, and each individual commissioner.	A self-assessment policy is used to evaluate the performance of the Board of Commissioners based on the achievement of work programs outlined in the Work Plan and Budget (RKA) of the Board of Commissioners. This evaluation includes indicators related to the duties and responsibilities of the Board of Commissioners, which are also part of the GCG Self-Assessment. The performance evaluation of the Board of Commissioners is reflected through three main indicators: advisory on performance, strengthening the executive function, and monitoring compliance. The GCG Self-Assessment consists of three main benchmarks: Governance Structure, Governance Process, and Governance Outcome. Governance Structure includes 14 indicators, Governance Process consists of 17 indicators, and Governance Outcome includes 6 indicators. Periodically, the Board of Commissioners also evaluates the committees under its authority, including the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and the Integrated Governance Committee.	✔		Chapter 7. Corporate Governance, Sub-Chapter Performance Assessment of the Board of Directors and Board of Commissioners, Page 763-787.
1.6	**Conflict of Interest**				
1.6.1	Board members who hold concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A commissioner must notify the Board of Commissioners and the chair of the committee performing the nomination function before accepting a new appointment as a director or commissioner of a public corporation, another directorship, or a position with a significant time commitment.	In the 2024 fiscal year, no members of the Board of Directors held concurrent positions outside of BNI. This is in accordance with the provisions set out in the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 on the Organization and Human Resources of State-Owned Enterprises and OJK Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks.	✔		Chapter 3. Company Profile Sub-Chapter Board of Directors Profile, Page 114-125. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners and Board of Directors Diversity Policy, Page 788-789.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
1.6.2	The Board of Commissioners monitors and manages potential conflicts of interest among management, members of the Board of Directors, the Board of Commissioners, and shareholders, including the misuse of corporate assets and abuse in related party transactions. Commissioners with conflicts of interest do not participate in monitoring or decision-making regarding potential conflicts of interest involving themselves or their affiliates.	BNI has a policy that prohibits members of the Board of Directors and the Board of Commissioners with conflicts of interest from participating in decision-making (abstaining) related to such conflicts. Each member of the Board of Commissioners must inform the Board of Directors and the Board of Commissioners if there is a potential conflict of interest, including if it arises from their position as a consultant or official at another company. Members of the Board of Directors must also immediately disclose their potential conflicts of interest to the Board of Commissioners and other Board members, and not participate in decision-making if there is a conflict of interest. In its report, the Board of Commissioners informs the General Meeting of Shareholders (GMS) of any material conflicts of interest that have occurred, along with their resolution.	✔		Corporate Governance, Sub-Chapter Insider Trading and Conflict of Interest Policy, Page 1059-1060.
1.7	**Competence Improvemenr of Members of the Board of Directors and Board of Commissioners**				
1.7.1	The Board of Commissioners ensures that members of the Board of Directors and the Board of Commissioners understand their roles and responsibilities, the characteristics and operations of the corporation, relevant laws and regulations, applicable standards, and other obligations. The Board of Directors, through the corporate secretary, supports all members of the Board of Directors and the Board of Commissioners in updating and refreshing the skills and knowledge necessary to perform their roles on the Board.	Newly appointed members of the Board of Directors and the Board of Commissioners are required to undergo an adequate Orientation and Introduction Program to understand their roles and responsibilities. Periodically, members of the Board of Directors and the Board of Commissioners participate in relevant, adequate, and ongoing Training and/or Competency Development programs. Additionally, members of the Board of Directors and the Board of Commissioners regularly receive accurate, timely, and clear information regarding the latest developments in laws and regulations, relevant standards, applicable obligations, as well as risk factors and the business environment.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, page 703-762. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, page 652-698.
2.	**Principle 2: Composition and Remuneration of the Board of Directors and Board of Commissioners**				
2.1	**Composition of the Board of Directors**				
2.1.1	In determining candidate directors, the Board of Commissioners through the Nomination and Remuneration Committee does not only rely on recommendations from the Board of Commissioners, management or majority shareholders. The Board of Commissioners through the Nomination and Remuneration Committee can use independent sources to determine qualified candidates.	The Board of Commissioners in determining candidate directors does not only rely on recommendations from BNI's internal organs, but also considers the results of assessments from independent external parties. This step is taken to ensure that the process of selecting candidate directors is carried out comprehensively and objectively, so that accountability is maintained.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of Directors and Board of Commissioners, Page 768-787.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
2.1.2	The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the knowledge, skills, and expertise needed to properly fulfill the role of the Board of Directors and pay attention to the fulfillment of diversity in the Board of Directors.	The Board of Commissioners ensures that the composition of the Board of Directors reflects the diversity in terms of skills, skills, knowledge, experience, age, cultural background, and gender needed to carry out the duties of the Board of Directors effectively. The number of members of the Board of Directors is determined by considering the conditions of the Bank, in order to ensure a more effective decision-making process. In this composition, there are Directors who have experience in finance, banking, IT, or other expertise needed to serve as members of the Board of Directors.	✔		Chapter 3. Company Profile Sub-Chapter Profile of the Board of Directors, Page 114-125. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of the Board of Directors and the Board of Commissioners, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter Diversity Policy of the Board of Commissioners and the Board of Directors, Page 788-789.
2.1.3	The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.	Diversity in the composition of the Board of Directors and Board of Commissioners is guided by the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks. The Diversity Policy of the Board of Directors and Board of Commissioners is disclosed in the 2024 Annual Report.	✔		Chapter 7. Corporate Governance, Sub-Chapter Diversity Policy of the Board of Commissioners and Board of Directors, Page 788-789.
2.1.4	The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent so that they can produce the desired composition of the Board. The Board of Commissioners uses independent sources to determine qualified candidates.	The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are carried out clearly and transparently. In the nomination process, the Board of Commissioners may use the services of independent external consultants, and relevant information regarding such consultants is disclosed in the annual report, including information regarding independence and potential conflicts of interest.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of Directors and Board of Commissioners, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter Diversity Policy of the Board of Commissioners and Board of Directors, Page 788-789.
2.1.5	The Board of Commissioners/ Committee carrying out the nomination function establishes nomination procedures and criteria that are consistent with the Board of Commissioners' expertise matrix that has been approved by the Board of Commissioners and ensures that the candidate's profile meets the requirements set out in the expertise matrix and nomination criteria.	The Board of Commissioners through the Nomination and Remuneration Committee is responsible for establishing nomination procedures and criteria that are guided by applicable laws and regulations.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of the Board of Directors and Board of Commissioners, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Page 810-826.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
2.1.6	The composition of the Board of Commissioners must be formed in such a way that its members as a group reflect the diversity in terms of ability, expertise, knowledge, experience, age, cultural background, and gender needed to properly fulfill the role of the Board of Commissioners.	BNI ensures that the composition of the Board of Commissioners reflects the diversity in terms of ability, expertise, knowledge, experience, age, cultural background, and gender needed to carry out the duties and functions of the Board of Commissioners effectively. In the composition of the Board of Commissioners, there are members who have experience in the financial and banking sectors. The number of members of the Board of Commissioners is determined in accordance with the provisions of applicable regulations, and takes into account the conditions of the Bank. Diversity in the composition of the Board of Directors and Board of Commissioners is guided by the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 Implementation of Governance for Commercial Banks.	✔		Chapter 3. Company Profile Sub-Chapter Board of Commissioners Profile, Page 100-111. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners and Board of Directors Diversity Policy, Page 788-789.
2.1.7	To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles that have the potential for conflict of interest, the Board of Commissioners consists of a sufficient number of Independent Commissioners, with limited terms of office and disclosure of the term of membership of the Board of Commissioners and their independence from a corporate perspective.	The number of Independent Commissioners in the composition of the BNI Board of Commissioners has BNI has met the criteria required in POJK No. 17 of 2023, which is a minimum of 50% of the total members of the Board of Commissioners. The number of Independent Commissioners in BNI has also met the minimum number of Independent Commissioners regulated in the ASEAN Corporate Governance Scorecard which requires the number of Independent Commissioners to be 50% (fifty percent) of the total members of the Board of Commissioners.	✔		Chapter 7. Corporate Governance, Sub-Chapter Independent Commissioners, Page 699-702.
2.1.8	To facilitate the effective functioning of the Board of Directors and Board of Commissioners and to enhance investor and stakeholder confidence, the Nomination and Remuneration Committee ensures that there is a formal, rigorous and transparent process for the appointment and promotion of members of the Board of Directors and Board of Commissioners.	The Nomination and Remuneration Committee is responsible for establishing nomination procedures and criteria that are guided by applicable laws and regulations.			Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of the Board of Directors and Board of Commissioners, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Page 810-826.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
2.2	**Remuneration of the Board of Directors and Board of Commissioners**				
2.2.1	The remuneration policy for members of the Board of Directors consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The remuneration of the Board of Directors must be proposed, possibly through the Nomination and Remuneration Committee, by the Board of Commissioners to be decided by the GMS. The amount of remuneration proposed to the GMS is determined by considering the role of each member of the Board of Directors and the economic situation and corporate performance.	BNI's remuneration policy is prepared fairly and reasonably, both in structure and amount, by considering the Bank's values, internal provisions, and remaining competitive and in line with stakeholder expectations and community norms. This policy is applied to the Board of Directors based on performance that supports the achievement of BNI's long-term goals, with indicators such as stock ownership options, deferred bonuses, and a policy of returning part or all of the bonuses/incentives that have been paid (clawback). Remuneration for the Board of Commissioners is fixed, and if there is performance-based remuneration, it must be based on the Bank's long-term development and is different from the policy for the Board of Directors. Independent Commissioners are prohibited from receiving stock options, performance-based shares, or bonuses. The Nomination and Remuneration Committee is responsible for ensuring that this policy is implemented fairly and transparently. The Committee provides recommendations to the Board of Commissioners regarding the structure, policies, and amount of remuneration, in accordance with the Committee Charter published on BNI's official website. The Board of Directors only receives facilities that have been approved by the BNI General Meeting of Shareholders (GMS), with a remuneration structure that takes into account the principle of prudence in taking risks to maintain business continuity. At the Annual GMS on March 4, 2024, shareholders determined the remuneration, including salary/honorarium, facilities, allowances for 2024, and bonuses for the Board of Directors and Board of Commissioners for the 2023 Financial Year.	✔		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration of the Board of Directors and Board of Commissioners, Page 768-787. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Page 810-826.
2.2.2	The remuneration policy for members of the Board of Commissioners consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The amount of remuneration proposed by the Board of Commissioners to the GMS is determined by considering the role of each member of the Board of Commissioners and the economic situation and corporate performance. In addition, their positions as President Commissioner and chairman and membership in committees must also be considered.				
2.2.3	To ensure that the remuneration package is determined based on the achievements, qualifications and competencies of directors and commissioners by taking into account the corporate operational performance, individual performance and market conditions, the Nomination and Remuneration Committee ensures that there is a fair and transparent procedure for determining the remuneration policy for members of the Board of Directors and Board of Commissioners.				

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
3.	**Principle 3: Employment Relationship between the Board of Directors and the Board of Commissioners**				
3.1	**Nature of the Employment Relationship**				
3.1.1	There is an open discussion between the Board of Directors and the Board of Commissioners as well as between the members of the Board of Directors and the members of the Board of Commissioners. However, it is still important to maintain the confidentiality of information to prevent leakage of confidential information.	The Board of Directors and the Board of Commissioners work together synergistically in formulating the Bank's vision, mission, and strategy through various forums, such as the Board of Commissioners Meeting with the Board of Directors, joint meetings, and other meetings. The members of the Board of Directors and the members of the Board of Commissioners hold open discussions, but it is still important to maintain the confidentiality of information to prevent leakage of confidential data. The Corporate Secretary, held by Okki Rushartomo, plays a strategic role in strengthening the working relationship between the Board of Directors and the Board of Commissioners, as well as encouraging good governance practices, including maintaining effective communication with Shareholders and other stakeholders. In addition, the Corporate Secretary is also responsible for: a. Ensuring a smooth flow of information between the Board of Commissioners, the Board of Directors, and related committees; b. Monitoring the development of governance, ensuring full implementation of the charter of the Board of Commissioners, the Board of Directors, and committees, and providing advice to the Board of Directors and the Board of Commissioners to meet stakeholder expectations; c. Managing meeting needs, including recording meeting minutes and ensuring effective communication between the Board of Directors and the Board of Commissioners, as well as accurately recording meeting discussions and decisions; d. Organizing orientation and professional development for new members of the Board of Directors, Board of Commissioners, and committees; e. Managing investor relations to maintain and improve communication with shareholders and investors, both local and international.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Page 703-762. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698. Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Page 899-905.
3.1.2	In accordance with their respective duties and roles, the Board of Directors works together with the Board of Commissioners in formulating the corporate mission, vision and strategy and regularly discusses its implementation.				
3.1.3	The Corporate Secretary has an important role in supporting the effectiveness of the working relationship between the Board of Directors and the Board of Commissioners, encouraging the implementation of good corporate governance practices, including effective communication with shareholders and other stakeholders.				

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
3.2	**Access to Board of Commissioners information**				
3.2.1	The Board of Directors is responsible for ensuring that the Board of Commissioners has access to accurate, relevant and timely information. The Board of Commissioners itself ensures that it obtains adequate information. The Board of Directors provides information to the Board of Commissioners regularly, without delay and comprehensively on all issues relevant to the corporation. The Board of Commissioners may request the Board of Directors to provide additional information at any time.	The Board of Directors ensures that the Board of Commissioners has access to accurate, relevant and timely information to support the effectiveness of the supervisory function. The Articles of Association and BNI's internal policies guarantee the availability of this information and authorize the Board of Commissioners to request additional information from the Board of Directors whenever necessary. The President Director, with the support of the Corporate Secretary, proactively informs the Board of Commissioners of any major material and important events regarding the condition, performance and management of the Bank. If necessary, a Board of Commissioners meeting can be held immediately to discuss the current condition of the Bank. Between these meetings, the Board of Commissioners also communicates regularly with the Board of Directors to always receive updates on corporate developments that require attention, so that it can carry out its supervisory duties more effectively.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Page 703-762. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698. Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Page 899-905.
3.3	**Responsibility of the Board of Directors and Board of Commissioners for the Impact of Ownership Structure on the Corporation**				
3.3.1	Impact of ownership structure on the corporation. The Board of Directors and the Board of Commissioners consider their responsibilities in the context of the corporation's shareholding structure and shareholder relationships that may impact the management and operations of the corporation.	The Board of Directors and the Board of Commissioners have a thorough understanding of the Bank's ownership structure and shareholder relationships and their impact on operational control. Both ensure that the shareholder structure and relationships do not interfere with the implementation of their functions, roles, and responsibilities in managing and supervising the Bank. The Board of Commissioners supervises, while the Board of Directors ensures accurate disclosure of information in the event of conditions that may impact the Bank's control.	✔		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Page 703-762. Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698.
4.	**Principle 4: Ethical and Responsible Behavior**				
4.1	**Guidelines for Ethics and Behavior**				
4.1.1	This statement is outlined in the Code of Conduct and Business Ethics which must clearly express the corporation's expectation that each member of the Board of Directors and Board of Commissioners and employee will: a. Act in the best interests of the corporation; b. Act honestly and with high standards of integrity;	BNI has and implemented a Code of Conduct that strictly regulates matters related to value systems, business ethics, work ethics, commitments, and enforcement of company regulations in conducting business and other activities. This guideline also clearly describes the rules of attitudes or interactions that are permitted or not permitted between employees and customers and other stakeholders.	✔		Chapter 7. Corporate Governance, Sub-Chapter Corporate Code of Ethics, Page 1044-1047.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
	c. Be independent and act based on complete information, in good faith, with due diligence and prudence; d. Comply with laws and regulations applicable to the corporation and its operations; e. Avoid actions that violate laws and regulations or actions that are unethical based on the corporate ethics guidelines; f. Not engage or participate in any activity that would create a conflict of interest with the best interests of the corporation or that would negatively impact the corporation's reputation; g. Not take advantage of the property or information owned by the corporation, other asset ownership or its customers for personal gain or that causes losses to the corporation and its customers; h. Not take advantage of his position or opportunities generated by his position for personal gain;	The preparation of the BNI Code of Ethics is always based on principles that are in line with BNI's vision, mission, and core values while still paying attention to internal provisions and applicable developments. The BNI Code of Ethics is prepared as a reference for all BNI Hi-Movers in acting and making decisions so that they always work professionally and based on the highest ethical standards. The Code of Ethics is binding and must be adhered to by all BNI employees, both permanent and non-permanent, at all levels of the organization, including the Board of Directors and the Board of Commissioners. The commitment of all BNI Hi-Movers personnel to comply with the Code of Ethics in every activity and implementation of daily tasks and responsibilities is stated in the Integrity Pact which must be signed by every BNI employee. With the written guidelines of the Code of Ethics, it is hoped that every employee has the awareness to implement the highest ethical standards so that later it can increase positive views and strengthen the Bank's reputation in the eyes of stakeholders.			

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
	i. Avoiding the act of requesting or receiving from third parties payments, gratuities or other benefits for themselves or for others that cause a conflict of interest/provide benefits to third parties in violation of laws and regulations; j. Respecting differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees; k. Ensuring complete, fair, accurate, timely and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.				
4.1.2	The Board of Directors establishes policies and practices for anti-money laundering and terrorism financing, anti-bribery, anti-corruption, anti-fraud, and involvement in politics by referring to national or international standards regarding anti-money laundering, anti-bribery, anti-corruption, anti-fraud or other related standards.	To prevent misuse of the banking system by irresponsible parties as a means to commit money laundering and terrorism financing, BNI always carries out banking operations by prioritizing the principle of prudence, where one of the efforts to implement this principle is by implementing the Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM) Program adequately. More than just carrying out obligations, the APU PPT and PPPSPM Programs implemented in BNI's environment also demonstrate BNI's firm stance as a Financial Services Institution (LJK) in building a healthy and sustainable financial industry ecosystem that is free from all forms of money laundering, terrorism financing, and proliferation financing. To prevent the practice of Money Laundering (TPPU) and Terrorism Financing (TPPT) which are categorized as transnational crimes that require extraordinary efforts in handling them, BNI is very careful in measuring APU PPT & PPPSPM risks at the customer level (customer risk rating) and bank-wide (Bank AML risk rating).	✔		Chapter 7. Corporate Governance, Sub-Chapter on Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM) Programs, Page 1028-1032.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
		To ensure that business activities are free from corruption, bribery, and fraud, BNI has formed several organizations, such as the Gratification Control Unit (UPG), Anti-Fraud Unit, and Anti-Fraud Committee. In addition, BNI also implements strict policies and procedures to enforce the principles of anti-corruption, anti-bribery, and anti-fraud, including the signing of an integrity pact by employees, Directors, and Board of Commissioners every year, periodic Gratification and Anti-Bribery Declarations, and ISO 37001:2016 Certification on the Anti-Bribery Management System (SMAP).			
4.2	**Corporate Values and Culture**				
4.2.1	The corporation articulates, fosters and expresses corporate culture and values.	BNI establishes the core values "AKHLAK"—Trusted, Competent, Harmonious, Loyal, Adaptive, and Collaborative—as a guideline for all BNI Hi-Movers in carrying out their daily tasks. The implementation of AKHLAK is strengthened through the transformation of work culture and PRINCIPLE 46 which emphasizes integrity and good governance. Some manifestations of this commitment include the signing of the Integrity Pact by all employees, the procurement of pacts in the work process, and the implementation of the prohibition of gratification. Efforts to internalize these values are continuously carried out to ensure compliance with ethical standards and transparency.	✔		Chapter 7. Corporate Governance, Sub-Chapter Corporate Code of Ethics, in the discussion entitled Corporate Values and Culture, Page 1047.
4.3	**Communication and Enforcement of Ethical Guidelines, Values and Culture**				
4.3.1	The corporate code of conduct and code of ethics are effectively communicated to the Board of Directors, Board of Commissioners, and all employees, integrated into corporate strategy and operations including the risk management system and remuneration structure, and enforced.	The Board of Directors consistently internalizes the corporate culture to shape the attitude and character of each BNI Hi-Movers. This internalization process is integrated into the Bank's operational strategy, including the risk management system and remuneration structure built with a prudent risk-taking approach. This step strengthens the values upheld by BNI and supports employee development so that they can face challenges in a dynamic banking environment.	✔		Chapter 7. Corporate Governance, Sub-Chapter Corporate Code of Ethics, Page 1044-1047.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
5.	**Principle 5: Risk Management, Internal Control and Compliance**				
5.1	**Internal Control and Compliance**				
5.1.1	The Board of Directors conducts regular reviews of the appropriateness of the design and operational effectiveness of the corporate governance, risk management, internal control and compliance systems and reports the implementation and results of the reviews to shareholders through the Corporation's annual report.	The Board of Directors implements, reviews, and updates the Bank's governance, including risk management, internal control, and compliance. The results of these activities are reported in the Annual Report as a form of accountability to shareholders and stakeholders. Furthermore, this report will be submitted at the General Meeting of Shareholders (GMS).	✔		Chapter 7. Corporate Governance, Sub-Chapter Internal Control System, Page 938-945.
5.2	**Risk Management**				
5.2.1	Strategy and risk are one entity, expressed transparently, included in the implementation of the duties and responsibilities of the Board of Directors and the Board of Commissioners, and in discussions at meetings of the Board of Commissioners and the Board of Directors.	Strategic planning and risk management at BNI are the joint responsibility of the Board of Directors and the Board of Commissioners, expressed transparently in accordance with their respective functions and roles. The risk management system is an important agenda in meetings between the Board of Commissioners and the Board of Directors, ensuring effective and responsive strategy integration to market conditions. Meanwhile, the Risk Monitoring Committee, in accordance with the established Charter, has the task of providing recommendations to the Board of Commissioners. This committee is responsible for monitoring and evaluating the implementation of the duties of the risk management committee under the Board of Directors and related work units.	✔		Chapter 7. Corporate Governance, Sub-Chapter Risk Management, Page 946-970.
5.2.2	The Risk Management Monitoring Committee assists the Board of Commissioners in carrying out its duties by creating a transparent, focused, and independent mechanism for supervising corporate risk management.	The Risk Monitoring Committee, as an integral part of the Board of Commissioners, plays an important role in supervising corporate risk management at BNI. With a transparent, focused, and independent approach, this committee carries out its duties in accordance with the guidelines in the Risk Monitoring Committee Charter. Through solid cooperation between the Board of Directors and the Board of Commissioners, this committee ensures that risk management practices are in line with the Bank's transformation strategy, including in facing current economic dynamics. The committee is also active in providing recommendations and suggestions to strengthen risk governance, so that BNI can continue to grow healthily and sustainably in a competitive market.	✔		Chapter 7. Corporate Governance, Sub-Chapter Risk Management Monitoring Committee, Page 826-839.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
5.3.	**Integration of Governance, Risk Management and Compliance**				
5.3.1	The Board of Directors builds an integrated governance, risk management, and compliance (GRC) system, by handling various uncertainties in an integrated manner and with high integrity, to ensure that the corporation can achieve its goals.	BNI's Board of Directors is committed to strengthening the integration of governance, risk management, and compliance systems as a whole. This effort aims to manage uncertainty and business risks with an integrated approach, ensuring that the Bank remains on the right track in achieving its strategic goals. One important step is to ensure that the compliance function runs independently, without overlapping with other functions that have the potential to create a conflict of interest. In addition, coordination through the implementation of the Governance, Risk and Compliance (GRC) forum continues to be improved, which includes governance, strategy management, performance, and internal audit. This allows BNI to operate with high integrity and ensure decision-making that is in line with best practices in the banking industry.	✔		Chapter 7. Corporate Governance, Sub-Chapter Integrated Risk Management Governance, Page 971-977.
5.3.2	The Board of Directors ensures that the part in charge of the compliance function does not concurrently carry out functions that have the potential to cause a conflict of interest.				
5.4.	**Internal Audit**				
5.4.1	The Board of Commissioners through the Audit Committee monitors and ensures that the internal audit function helps the corporation achieve its objectives by bringing an objective and disciplined approach to evaluating and improving the effectiveness of risk management, internal control, and corporate governance.	The Board of Commissioners through the Audit Committee continues to monitor the implementation of BNI's internal audit function to be in line with operational demands and current developments. This monitoring is carried out by ensuring that the audit is carried out objectively, measurably, and oriented towards achieving the Bank's strategic objectives. This step is in line with BNI's efforts to strengthen the integrity and effectiveness of internal control, as well as ensuring that risk management is carried out to the highest standards. Thus, the Board of Commissioners supports the achievement of optimal performance and compliance with applicable regulations in the banking sector	✔		Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Page 792-810.
6.	**Principle: 6 Disclosure and Transparency**				
6.1.	**Disclosure Policy**				
6.1.1	The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive and confidential corporate information.	BNI has established policies and procedures for the disclosure of material information and protection of corporate confidentiality, in order to guarantee the rights of shareholders to obtain important information routinely and in a timely manner. The Corporate Secretary Division is responsible for managing this disclosure in accordance with the standards set out in the Company Guidelines No. IN/511/REN/001, which came into effect on June 27, 2023.	✔		Chapter 7. Corporate Governance, Sub-Chapter Transparency in Report Submission, Page 1091.
6.1.2	The right of shareholders to receive timely and regular information about the corporation that is relevant to the corporation must be respected.				

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
6.2	**Financial Reporting and Sustainability**				
6.2.1	The Corporation discloses the systems and procedures to ensure that interim financial statements that are not audited or reviewed by external auditors are materially accurate, complete, and provide investors with appropriate information to make informed investment decisions.	BNI has an internal policy that regulates the review of financial information to be published, such as financial statements, projections, and other related reports. This review is conducted by the Audit Committee to ensure accuracy and compliance with applicable regulations. The Audit Committee also evaluates the provision of audit services for annual historical financial information by Public Accountants or Public Accounting Firms. The BNI Sustainability Report published on the official website is prepared based on accurate data disclosure and in accordance with domestic and international regulations and best practices. This Annual Report provides an overview of BNI's historical performance in the context of risks, opportunities, and future prospects, thereby helping shareholders and stakeholders understand the Bank's strategic objectives and the progress achieved in creating sustainable value	✔		Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Page 792-810. Chapter 7. Corporate Governance, Sub-Chapter Transparency of Report Submission, Page 1091.
6.2.2	The Audit Committee ensures the quality of the financial statement audits performed by external auditors. This activity includes recommending the appointment, reappointment and, if necessary, the dismissal and remuneration of external auditors.	The 2024 BNI Sustainability Report is published in a separate book but is integrated with the 2024 BNI Annual Report.	✔		
6.2.3	Sustainability reports must be prepared and disclosed accurately and in accordance with a national or international sustainability reporting framework.				
6.2.4	The Corporation publish an integrated annual report that places historical performance in context and describes the corporation's risks, opportunities and future prospects, helping shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value.				

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
6.3	**Dissemination of Information**				
6.3.1	Information dissemination channels must provide equal, timely, and relatively inexpensive access to relevant information for users.	BNI utilizes information technology effectively to ensure broad and secure information disclosure. In addition to the official website, BNI uses various other platforms, such as social media (X, Facebook, YouTube, Instagram, TikTok), print media, and electronic media to provide equal, timely, and relevant access to information for shareholders and other stakeholders. Information can also be accessed through the GMS (General Meeting of Shareholders), BNI's official website, and the IDX and KSEI platforms, thus facilitating communication with investors. As part of efforts to maintain transparent communication, BNI regularly holds meetings with financial analysts. These meetings are intended to provide updates on the Bank's performance, prospects, and policy direction. This BNI 2024 Annual Report has detailed the implementation of laws and regulations or generally applicable governance guidelines, namely the Asean Corporate Governance Scorecard (ACGS) and the General Guidelines for Indonesian Corporate Governance (PUGKI) in the Bank's operational activities during 2024.	✔		Chapter 7. Corporate Governance, Sub-Chapter Transparency of Report Submission, Page 1091. Chapter 7. Corporate Governance, Sub-Chapter Implementation of General Guidelines for Indonesian Corporate Governance (PUGKI), Page 1111-1137.
6.3.2	Corporations ensure that annual statements on the implementation of the General Guidelines for Indonesian Corporate Governance, including explanations on the implementation of each Recommendation and Guideline, are available on the website for a minimum period of five years.				
6.3.3	For corporations listed on the capital market in jurisdictions other than the home jurisdiction, the applicable laws and regulations on corporate governance must be clearly disclosed. In the case of cross-listing, the criteria and procedures for cross-listing, the criteria and procedures for recognizing listing requirements for the primary listing must be transparent and documented.				
7.	**Principle 7: Protection of Shareholder Rights**				
7.1	**Shareholder Rights**				
7.1.1	The corporation has a communication policy that facilitates and encourages shareholder or investor participation.	BNI has a communication policy that encourages shareholder and investor participation, in accordance with Company Guidelines No. IN/794/KMP/001 dated December 23, 2014, Investor Relations Activity Guidelines No. IN/41/KMP/001 dated January 26, 2015, Company Guidelines No. IN/511/REN/001 dated June 27, 2023, and Company Guidelines No. IN/001/IRN/001 dated October 3, 2024. This policy aims to ensure that shareholders and investors have access to relevant and accurate information regarding BNI's performance and policies. As the main entity, BNI also ensures that corporate governance policies are implemented comprehensively in the BNI financial conglomerate, creating alignment in governance practices across all business units.	✔		Transparency of Report Submission, Page 1091. Chapter 7. Corporate Governance, Sub-Chapter on Implementation of the Indonesian General Guidelines for Corporate Governance (PUGKI), Pages 1111-1137.
7.1.2	The corporation that is the parent entity ensures that its corporate governance policies apply to subsidiaries and entities under common control in which the corporation has significant investments.				
7.1.3	The corporation has rules and procedures governing acquisitions, takeovers, and extraordinary transactions such as mergers and sales of substantial corporate assets to ensure that the transactions occur transparently and on fair terms and protect the rights of all shareholders according to their class.				

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
7.2	**Fair Treatment of Shareholders**				
7.2.1	The Corporation has rules and procedures that ensure: a. All shareholders of the same series in one class of shares must be treated equally, b. Disclosure of such rules and procedures and disclosure of capital structures and arrangements that allow certain shareholders to obtain influence or control disproportionate to their shareholdings.	All shareholders, whether minority or majority, domestic or non-domestic, are treated equally by the Bank. Information relevant to shareholders is published through easily accessible media, such as the Bank's website, IDX, and KSEI, in both Indonesian and English.	✔		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, in the discussion entitled General Rights of Shareholders, Page 631, and the discussion entitled Fair Treatment of Shareholders, Page 631.
7.2.2	The Corporation has rules and procedures that ensure related party transactions are approved and implemented in a manner that ensures that conflicts of interest are managed appropriately, and protect the interests of the corporation and its shareholders.	The Bank ensures that related party transactions are conducted in accordance with applicable laws and regulations, and that conflicts of interest are managed appropriately to protect the interests of the Bank and its shareholders.	✔		Chapter 4. Management Analysis and Discussion of Bank Performance, Sub-Chapter Information on Material Transactions Containing Conflicts of Interest and/or Affiliated Transactions with Affiliated Parties/ Related Parties, Page 387-396.
7.2.3	The Corporation has and discloses a policy to prevent insider trading. The Corporation has clear rules regarding any trading in the corporation's shares by directors, commissioners and insiders to ensure that no one can directly or indirectly benefit from information that is not/not yet available in the market.	The Bank has established a policy to prevent insider trading through the Company's Guidelines on Prohibited and Non-Prohibited Securities Transactions for Insiders, in accordance with No. IN/500/KMP/001 dated September 23, 2019.	✔		Chapter 7. Corporate Governance, Sub-Chapter Insider Trading and Conflict of Interest Policy, Page 1059-1060.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
7.3	**General Meeting of Shareholders**				
7.3.1	The corporation issues a GMS invitation with the agenda and materials of the GMS as complete and as early as possible (no later than 28 days before the GMS) to provide sufficient time and materials for shareholders to study the meeting agenda properly. The meeting invitation and all GMS information are disclosed through electronic means such as through the corporation's website.	On February 7, 2024, BNI has issued a summons for BNI Shareholders to attend the Annual General Meeting of Shareholders for the 2023 Fiscal Year which will be held on Monday, March 4, 2024 at 14.00 WIB until finished. The GMS summons letter includes the GMS agenda and has been published on the BNI, BEI, and KSEI websites. The GMS summons has also been reported to the OJK and BEI.	✔		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, Page 1059-1060.
7.3.2	The corporation has and discloses rules and procedures that facilitate shareholders in participating and voting effectively at the GMS.	BNI has rules and procedures that facilitate shareholders in participating and voting effectively at the GMS. In organizing the 2024 GMS, BNI has published the Meeting Rules of Procedure which include information related to facilities for shareholders to participate and vote effectively at the GMS.	✔		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, Page 630-651.
7.3.3	Shareholders participate effectively in determining the appointment of members of the Board of Directors and Board of Commissioners.	At the 2024 GMS, Shareholders are given the opportunity to ask questions and/or provide responses, and to voice their opinions in the discussion of the Agenda for Changes in the Composition of the Company's Management.	✔		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, Page 630-651.
7.3.4	The corporation ensures transparency and accountability of external auditors at the GMS.	At the GMS held in 2024, in the Agenda for Determination of Public Accounting Firms (KAP) and/or Public Accountants (AP), BNI has provided an explanation regarding the KAP and/or AP proposed in the Meeting.	✔		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, Page 630-651.
7.3.5	The complete voting results and summary of the minutes of the GMS were announced to the public on the following business day.	The voting results and summary of the minutes of the GMS were announced to the public on the following business day. The Summary of the Minutes of the Meeting has been reported to the regulators, namely the OJK and BEI. The Summary of the Minutes of the Meeting has also been published on the regulator's website and BNI.	✔		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, Page 630-651.

No.	KNKG Recommendation	Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosure in Annual Report 2024
			Applied	Not yet	
8.	**Principle 8: Other Stakeholders**				
8.1	**Key Stakeholder Engagement**				
8.1.1	The Corporation through the Corporate Secretary carries out regular, transparent and effective communication with key stakeholders and involves them to understand their expectations and complaints and the impact of the corporation on them.	The BNI Corporate Secretary is responsible for carrying out regular, transparent and effective communication with key stakeholders, and ensuring stakeholder involvement in BNI's business development. In addition, the Corporate Secretary seeks to understand stakeholder expectations and complaints, by considering the impact of the Bank's strategic decisions on these parties.	✔		Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Page 899-905.
8.2	**Integrating Sustainability into Business Models**				
8.2.1	The Board of Commissioners together with the Board of Directors are responsible, accountable and transparent for sustainability governance, including setting corporate sustainability strategies, priorities and targets. The Board of Directors and the Board of Commissioners include sustainability considerations when carrying out their roles, including among others in the development and implementation of corporate strategies, business plans, main action plans and risk management.	The Board of Commissioners and the Board of Directors of BNI have a joint responsibility to ensure good sustainability governance, with the principles of accountability and transparency. This responsibility includes setting strategies, determining priorities and achieving sustainability targets that are in line with the Bank's vision. In carrying out their duties, the Board of Commissioners and the Board of Directors always consider sustainability aspects in every operational aspect, including the development and implementation of business strategies, long-term planning, implementation of main action plans, and risk management to support the Bank's overall sustainability.	✔		BNI Annual Report 2024, Chapter 7. Corporate Governance. BNI Sustainability Report 2024
8.3	**Protection of Stakeholders**				
8.3.1	The Board of Directors ensures and discloses that the corporation's operations reflect the implementation of high ethical standards, social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are implemented to respect and comply with stakeholder rights.	The Board of Directors ensures that all BNI operations reflect the implementation of high ethical standards, social responsibility, and compliance with environmental principles throughout the Bank. The Board of Directors also ensures that appropriate policies and procedures are implemented to respect and comply with stakeholder rights. In addition, the Board of Directors consistently conveys BNI's vision that focuses on sustainable performance to employees, to ensure understanding and implementation that is in line with the Bank's sustainability goals.	✔		Chapter 7. Corporate Governance, Sub-chapter Code of Ethics, Page 1044-1047. Chapter 8. Corporate Social and Environmental Responsibility, Page 1154-1169.
8.3.2	The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritize sustainability.				

Implementation of the ASEAN Corporate Governance Scorecard [ACGS C.2.6]

The ASEAN Corporate Governance Scorecard (ACGS) assessment is an initiative of the ASEAN Capital Market Forum (ACMF) aimed at enhancing corporate governance standards and practices among publicly listed companies in ASEAN. This initiative seeks to improve the global investability of ASEAN-listed companies with strong corporate governance and to showcase to the global community that ACGS-participating companies are attractive investment destinations.

In 2024, BNI conducted an assessment of its Good Corporate Governance (GCG) implementation using the 2024 ASEAN Corporate Governance Scorecard (ACGS) parameters, 2nd revision. As a result, BNI achieved the "Leadership in Corporate Governance" status with a score of 115.56, an improvement from the previous year's score of 108.39. This assessment was conducted by an independent party and was based on BNI's publicly available disclosures, ensuring transparency for all stakeholders in accordance with ACGS parameters. The availability of information based on these parameters is outlined as follows:

LEVEL 1

A. Rights and Equitable Treatment of Shareholders

No.	Principles and Recommendations	Page
A.1	**Basic Shareholder Rights**	
A.1.1	Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by shareholders at general meetings for final dividends? In case the company has offered Scrip dividend, did the company paid the dividend within 60 days.	374, 640, 643 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pengumuman-Risalah-RUPS-Tahunan-Tahun-Buku-2023-EN.pdf page 13
A.2	**Right to participate effectively in and vote in general shareholder meetings and should be informed of the rules, including voting procedures, that govern general shareholder meetings.**	
A.2.1	Do shareholders have the opportunity, evidenced by an agenda item, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non-executive directors/commissioners?	631 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Berita-Acara-RUPS-Tahunan-Tahun-2023-4-Maret-2024-EN.pdf page 93
A.2.2	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners?	631
A.2.3	Does the company allow shareholders to elect directors/commissioners individually?	642, 656 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Berita-Acara-RUPS-Tahunan-Tahun-2023-4-Maret-2024-EN.pdf page 116-117
A.2.4	Does the company disclose the voting procedures used before the start of meeting?	634
A.2.5	Do the minutes of the most recent AGM record that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded?	634, 639-642
A.2.6	Does the company disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item for the most recent AGM?	639-642
A.2.7	Does the company disclose the list of board members who attended the most recent AGM?	637
A.2.8	Does the company disclose that all board members and the CEO (if he is not a board member) attended the most recent AGM?	637
A.2.9	Does the company allow voting in absentia?	636
A.2.10	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	636

No.	Principles and Recommendations	Page
A.2.11	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?	637
A.2.12	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM/EGM for all resolutions?	638 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pengumuman-Risalah-RUPS-Tahunan-Tahun-Buku-2023-(Inggris).pdf Halaman 1 dan 14
A.2.13	Does the company provide at least 21 days notice for all AGMs and EGMs?	633, 638 https://www.bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan-RUPS-Tahunan-Tahun-Buku-2023-ENG.pdf Halaman 1 dan 4
A.2.14	Does the company provide the rationale and explanation for each agenda item which require shareholders' approval in the notice of AGM/circulars and/or the accompanying statement?	633 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pemanggilan-RUPS-Tahunan-Tahun-Buku-2023-ID.pdf
A.2.15	Does the company give the opportunity for shareholders to place item/s on the agenda of general meetings and/or to request for general meetings subject to a certain percentage?	633
A.3	**Markets for corporate control should be allowed to function in an efficient and transparent manner.**	
A.3.1	In cases of mergers, acquisitions and/or takeovers requiring shareholders' approval, does the board of directors/commissioners of the company appoint an independent party to evaluate the fairness of the transaction price?	386, 387
A.4	**The exercise of ownership rights by all shareholders, including institutional investors, should be facilitated.**	
A.4.1	Does the company disclose its practices to encourage shareholders to engage with the company beyond general meetings?	907
A.5	**Shares and voting rights**	
A.5.1	Where the company has more than one class of shares, does the company publicise the voting rights attached to each class of shares (e.g. through the company website / reports/ the stock exchange/ the regulator's website)?	631 https://www.bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/Anggaran-Dasar-PT-Bank-Negara-Indonesia-(Persero)-Tbk.pdf halaman 22-23
A.6	**Notice of AGM**	
A.6.1	Does each of the resolutions tabled at the most recent annual general meeting deal with only one item, i.e., there is no bundling of several items into the same resolution?	635, 639-643
A.6.2	Are the company's notice of the most recent AGM/ circulars fully translated into English and published on the same date as the local-language version?	633 https://www.bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan-RUPS-Tahunan-Tahun-Buku-2023-ENG.pdf, https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pemanggilan-RUPS-Tahunan-Tahun-Buku-2023-ID.pdf
	Does the notice of AGM/circulars have the following details:	
A.6.3	Are the profiles of directors/commissioners (at least age, academic qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?	633
A.6.4	Are the auditors seeking appointment/re-appointment clearly identified?	641 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Materi_Pemanggilan_RUPS_Tahunan_TB2023_EN_V6.pdf Halaman 6.
A.6.5	Were the proxy documents made easily available?	https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Surat-Kuasa-RUPS-Tahunan-TB-2023.pdf

No.	Principles and Recommendations	Page
A.7	**Insider trading and abusive self-dealing should be prohibited.**	
A.7.1	Are the directors / commissioners required to report their dealings in company shares within 3 business days?	1070
A.8	**Related party transactions by directors and key executives.**	
A.8.1	Does the company have a policy requiring a committee of independent directors/ commissioners to review material RPTs to determine whether they are in the best interests of the company and shareholders?	387-388, 1049
A.8.2	Does the company have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted?	663-664, 727-728
A.8.3	Does the company have policies on loans to directors and commissioners either forbidding this practice or ensuring that they are being conducted at arm's length basis and at market rates?	664, 728
A.9	**Protecting minority shareholders from abusive actions**	
A.9.1	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length?	387-388
A.9.2	In case of related party transactions requiring shareholders' approval, is the decision made by disinterested shareholders?	387

B. Sustainability and Resilience

No.	Principles and Recommendations	Page
B.1	Sustainability-related disclosure should be consistent, comparable and reliable, and include retrospective and forward-looking material information that a reasonable investor would consider important in making an investment or voting decision	
Material Sustainability-related information should be specified		
B.1.1	Does the company identify/report ESG topics that are material to the organization's strategy?	Sustainability Report page 27
B.1.2	Does the company identify climate change as an issue?	Sustainability Report page 39
B.1.3	Does the company adopt an internationally recognized reporting framework or standard for sustainability (i.e. GRI, Integrated Reporting, SASB, IFRS Sustainability Disclosure Standards)?	Sustainability Report page 24
If a company publicly sets a sustainability-related goal or target, the disclosure framework should provide that reliable metrics are regularly disclosed in an easily accessible form		
B.1.4	Does the company disclose quantitative sustainability target?	Sustainability Report page 33, 17-19
B.1.5	Does the company disclose sustainability-related performance progress in relation to its previously set targets?	Sustainability Report page 33
B.1.6	Does the company confirm that its Sustainability Report/ Reporting is reviewed and /or approved by the Board or Board Committee?	Sustainability Report page 25, 154-155
B.2	**Corporate governance frameworks should allow for dialogue between a company, its shareholders and stakeholders to exchange views on sustainability matters**	
B.2.1	Does the company engage internal stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company?	Sustainability Report page 26, 147-148
B.2.2	Does the company engage external stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company?	Sustainability Report page 26, 147-149
B.3	**The corporate governance framework should ensure that boards adequately consider material sustainability risks and opportunities when fulfilling their key functions in reviewing, monitoring and guiding governance practices, disclosure, strategy, risk management and internal control systems, including with respect to climate-related physical and transition risks**	
Boards should assess whether the company's capital structure is compatible with its strategic goals and its associated risk appetite to ensure it is resilient to different scenarios		
B.3.1	Does the company disclose that the board reviews on an annual basis that the company's capital and debt structure is compatible with its strategic goals and its associated risk appetite?	352, 865
B.4	**The corporate governance framework should recognise the rights of stakeholders established by law or through mutual agreements and encourage active co- operation between corporations and stakeholders in creating wealth, jobs, and the sustainability of financially sound enterprises.**	
	Does the company disclose a policy and practices that address:	
B.4.1	The existence and scope of the company's efforts to address customers' welfare?	233, 456
B.4.2	Supplier/contractor selection procedures?	1039-1040

No.	Principles and Recommendations	Page
B.4.3	The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	5, 1160, Sustainability Report page 132
B.4.4	The company's efforts to interact with the communities in which they operate?	1164, Sustainability Report page 103
B.4.5	The company's anti-corruption programmes and procedures?	1033, 1044, Sustainability Report page 143
B.4.6	How creditors' rights are safeguarded?	1053
B.4.7	Does the company have a separate report/section that discusses its efforts on environment/ economy and social issues?	1053
B.5	**Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.**	
B.5.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/ or complaints for possible violation of their rights?	80, 205 https://www.bni.co.id/ en-us/company/corporate-governance/whistle-blowing-system
B.6	**Mechanisms for employee participation should be allowed to be developed.**	
B.6.1	Does the company explicitly disclose the policies and practices on health, safety and welfare for its employees?	424, 426, Sustainability Report page 128
B.6.2	Does the company explicitly disclose the policies and practices on training and development programmes for its employees?	161
B.6.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	424, 430
B.7	**Stakeholders including individual employee and their representative bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this.**	
B.7.1	Does the company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behaviour and provide contact details via the company's website or annual report	1080-1081 https://www.bni.co.id/ en-us/company/corporate-governance/whistle-blowing-system
B.7.2	Does the company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behaviour from retaliation?	1081-1082

C. Disclosure and Transparency

No.	Principles and Recommendations	Page
C.1	**Transparent ownership structure**	
C.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	171
C.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	168-171
C.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	172
C.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	174
C.1.5	Does the company disclose details of the parent/ holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	176, 177
C.2	**Annual Report Quality**	
	Does the company's annual report disclose the following items:	
C.2.1	Corporate objectives	226
C.2.2	Financial performance indicators	22-30
C.2.3	Non-financial performance indicators	1172
C.2.4	Dividend policy	373
C.2.5	Biographical details (at least age, academic qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of all directors/commissioners	100-125
	Corporate Governance Confirmation Statement	
C.2.6	Does the Annual Report contain a statement confirming the company's full compliance with thecode of corporate governance and where there is non- compliance, identify and explain reasons for each such issue?	938, 971, 1091, 1094, 1095, 1104, 1111

No.	Principles and Recommendations	Page
C.3	**Remuneration of Members of the Board and Key Executives**	
C.3.1	Is there disclosure of the fee structure for non- executive directors/commissioners?	776-778
C.3.2	Does the company publicly disclose [i.e. annual report or other publicly disclosed documents] details of remuneration of each non-executive director/ commissioner?	779
C.3.3	Does the company disclose its remuneration (fees, allowances, benefit-in-kind and other emoluments) policy/practices (i.e. the use of short term and long term incentives and performance measures) for its executive directors and CEO?	781-782
C.3.4	Does the company publicly disclose [i.e. annual report or other publicly disclosed documents] the details of remuneration of each of the executive directors and CEO [if he/she is not a member of the Board]?	783
C.4	**Related party transaction disclosure (RPT)**	
C.4.1	Does the company disclose its policy covering the review and approval of material RPTs?	388
C.4.2	Does the company disclose the name, relationship, nature and value for each material RPTs?	387
C.5	**Directors and Commissioners who deal in the Company's shares**	
C.5.1	Does the company disclose trading in the company's shares by insiders?	1072-1077
C.6	**External Auditor and Auditor's Report**	
	Where the same audit firm is engaged for both audit and non-audit services	
C.6.1	Are the audit and non-audit fees disclosed?	202, 982
C.6.2	Does the non-audit fee exceed the audit fees?	202, 982
C.7	**Communication Media**	
	Does the company use the following modes of communication?	
C.7.1	Quarterly reporting	https://www.bni.co.id/en-us/investors/financial-reports
C.7.2	Company website	205 https://www.bni.co.id/en-us/
C.7.3	Analyst's briefing	https://www.bni.co.id/en-us/investors/events-presentation
C.7.4	Media briefings /press conferences	990-997 https://www.bni.co.id/en-us/home/bni-news/news/categoryid/29
C.8	**Timely filing/release of annual/financial reports**	
C.8.1	Are the audited annual financial report / statement released within 120 days from the financial year end?	357
C.8.2	Is the annual report released within 120 days from the financial year end?	357
C.8.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	1201
C.9	**Company website**	
	Does the company have a website disclosing up-to-date information on the following:	
C.9.1	Financial statements/reports (latest quarterly)	206 https://www.bni.co.id/en-us/investors/financial-reports
C.9.2	Materials provided in briefings to analysts and media	207 https://www.bni.co.id/en-us/investors/events-presentation
C.9.3	Downloadable annual report	206 https://www.bni.co.id/en-us/investors/financial-reports
C.9.4	Notice of AGM and/or EGM	206 https://www.bni.co.id/en-us/company/corporate-governance/gms
C.9.5	Minutes of AGM and/or EGM	206 https://www.bni.co.id/en-us/company/corporate-governance/gms
C.9.6	Company's constitution (company's by-laws, memorandum and articles of association)	206 https://www.bni.co.id/en-us/company/corporate-governance/articles-of-association

No.	Principles and Recommendations	Page
C.10	**Investor relations**	
C.10.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations?	206 https://www.bni.co.id/en-us/investors/contact-us

D. Responsibilities of the Board

No.	Principles and Recommendations	Page
D.1	**Board Duties and Responsibilities**	
	Clearly defined board responsibilities and corporate governance policy	
D.1.1	Does the company disclose its corporate governance policy / board charter?	652
D.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed ?	692-693, 722-723
D.1.3	Are the roles and responsibilities of the board of directors/commissioners clearly stated ?	658, 660, 710, 721 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Board-Manual-Dewan-Komisaris-BNI.pdf hal 7, https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Direksi.pdf halaman 15.
	Corporate Vision/Mission	
D.1.4	Does the company have an updated vision and mission statement?	86-88
D.1.5	Does the board of directors play a leading role in the process of developing and reviewing the company's strategy at least annually?	61
D.1.6	Does the board of directors have a process to review, monitor and oversee the implementation of the corporate strategy?	61
D.2	**Board structure**	
	Code of Ethics or Conduct	
D.2.1	Are the details of the code of ethics or conduct disclosed?	1044-1047
D.2.2	Are all directors/commissioners, senior management and employees required to comply with the code/s?	1045-1046
D.2.3	Does the company have a process to implement and monitor compliance with the code/s of ethics or conduct?	1045-1046
	Board Structure & Composition	
D.2.4	Do independent directors/commissioners make up at least 50% of the board of directors/ commissioners?	699
D.2.5	Does the company have a term limit of nine years or less or 2 terms of five years1 each for its independent directors/ commissioners? 1 The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard in 2011	654
D.2.6	Has the company set a limit of five board seats that an individual independent/non-executive director/commissioner may hold simultaneously?	662-663
D.2.7	Does the company have any executive directors who serve on more than two boards of listed companies outside of the group?	114-125, 726
	Nominating Committee	
D.2.8	Does the company have a Nominating Committee?	810
D.2.9	Is the Nominating Committee comprised of a majority of independent directors/ commissioners?	814
D.2.10	Is the chairman of the Nominating Committee an independent director/commissioner?	814
D.2.11	Does the company disclose the terms of reference/ governance structure/charter of the Nominating Committee?	810
D.2.12	Is the meeting attendance of the Nominating Committee disclosed and if so, did the Nominating Committee meet at least twice during the year?	820-821
	Remuneration Committee / Compensation Committee	
D.2.13	Does the company have a Remuneration Committee?	810
D.2.14	Is the Remuneration Committee comprised entirely of non-executive directors/commissioners with a majority of independent directors/commissioners ?	814
D.2.15	Is the chairman of the Remuneration Committee an independent director/commissioner?	814
D.2.16	Does the company disclose the terms of reference/ governance structure/ charter of the Remuneration Committee?	810

No.	Principles and Recommendations	Page
D.2.17	Is the meeting attendance of the Remuneration Committee disclosed and, if so, did the Remuneration Committee meet at least twice during the year?	820-821
	Audit Committee	
D.2.18	Does the company have an Audit Committee?	792
D.2.19	Is the Audit Committee comprised entirely of non-executive directors/commissioners with a majority of independent directors/commissioners?	795
D.2.20	Is the chairman of the Audit Committee an independent director/commissioner?	795
D.2.21	Does the company disclose the terms of reference/governance structure/charter of the Audit Committee?	792 https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Komite-Audit-2024.pdf
D.2.22	Does at least one of the independent directors/commissioners of the committee have accounting expertise (accounting qualification or experience)?	795-797
D.2.23	Is the meeting attendance of the Audit Committee disclosed and, if so, did the Audit Committee meet at least four times during the year?	799-802
D.2.24	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	793
D.3	**Board Processes**	
	Board meetings and attendance	
D.3.1	Are the board of directors meeting scheduled before the start of financial year?	742
D.3.2	Does the board of directors/commissioners meet at least six times during the year?	667-668, 731-732
D.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?	667-668, 731-732
D.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	667, 730
D.3.5	Did the non-executive directors/commissioners of the company meet separately at least once during the year without any executives present?	667-668
	Access to information	
D.3.6	Are board papers for board of directors/commissioners meetings provided to the board at least five business days in advance of the board meeting?	666, 730
D.3.7	Does the company secretary play a significant role in supporting the board in discharging its responsibilities?	900
D.3.8	Is the company secretary trained in legal, accountancy or company secretarial practices and has kept abreast on relevant developments?	901-903
	Board Appointments and Re-Election	
D.3.9	Does the company disclose the criteria used in selecting new directors/commissioners?	653-654, 704-705
D.3.10	Did the company describe the process followed in appointing new directors/commissioners?	656, 708
D.3.11	Are all directors/commissioners subject to re-election every 3 years; or 5 years for listed companies in countries whose legislation prescribes a term of 5 years2 each? 2 The five years term must be required by legislation which pre-existed the introduction of the ASEAN Corporate Governance Scorecard in 2011	654, 705
	Remuneration Matters	
D.3.12	Do the shareholders or the Board of Directors approve the remuneration of the executive directors and/or the senior executives?	640
D.3.13	Does the company have measurable standards to align the performance-based remuneration of the executive directors and senior executives with long-term interests of the company, such as claw back provision and deferred bonuses?	773-774, 780, 1066
	Internal Audit	
D.3.14	Does the company have a separate internal audit function?	909
D.3.15	Is the head of internal audit identified or, if outsourced, is the name of the external firm disclosed?	914
D.3.16	Does the appointment and removal of the internal auditor require the approval of the Audit Committee?	913
	Risk Oversight	
D.3.17	Does the company establish a sound internal control procedures/risk management framework and periodically review the effectiveness of that framework?	938-939, 944-945
D.3.18	Does the Annual Report/Annual CG Report disclose that the board of directors/commissioners has conducted a review of the company's material controls (including operational, financial and compliance controls) and risk management systems?	945, 947-948

No.	Principles and Recommendations	Page
D.3.19	Does the company disclose the key risks to which the company is materially exposed to (i.e. financial, operational including IT, environmental, social, economic)?	955
D.3.20	Does the Annual Report/Annual CG Report contain a statement from the board of directors/ commissioners or Audit Committee commenting on the adequacy of the company's internal controls/risk management systems?	945, 955
D.4	**People on the Board**	
	Board Chairman	
D.4.1	Do different persons assume the roles of chairman and CEO?	100, 114
D.4.2	Is the chairman an independent director/commissioner?	100
D.4.3	Is any of the directors a former CEO of the company in the past 2 years?	114-125
D.4.4	Are the roles and responsibilities of the chairman disclosed?	658
	Lead Independent Director	
D.4.5	If the Chairman is not independent, has the Board appointed a Lead/Senior Independent Director and has his/her role been defined?	100
	Skills and Competencies	
D.4.6	Does at least one non-executive director/commissioner have prior working experience in the major sector that the company is operating in?	100-101
D.5	**Board Performance**	
	Board Performance Directors Development	
D.5.1	Does the company have orientation programmes for new directors/commissioners?	682-683, 758
D.5.2	Does the company have a policy and actual practice and programs that encourages directors/ commissioners to attend on-going or continuous professional education programmes?	679-682, 744-758
	CEO/Executive Management Appointments and Performance	
D.5.3	Does the company disclose the process on how the board of directors/commissioners plans for the succession of the CEO/Managing Director/President and key management?	772
D.5.4	Does the board of directors/commissioners conduct an annual performance assessment of the CEO/Managing Director/President?	763-764
	Board Appraisal	
D.5.5	Did the company conduct an annual performance assessment of the board of directors/ commissioners and disclose the criteria and process followed for the assessment?	763-764, 766-767
	Director Appraisal	
D.5.6	Did the company conduct an annual performance assessment of the individual directors/ commissioners and disclose the criteria and process followed for the assessment?	763-767
	Committee Appraisal	
D.5.7	Did the company conduct an annual performance assessment of the board committees and disclose the criteria and process followed for the assessment?	694-695, 761-762

LEVEL 2 – BONUS ITEMS

(B) A. Rights and Equitable Treatment of shareholders

No.	Principles and Recommendations	Page
(B) A.1	**Right to participate effectively in and vote in general shareholders meeting and should be informed of the rules, including voting procedures, that govern general shareholders meeting.**	
(B) A.1.1	Does the company practice real time secure electronic voting in absentia at general meetings of shareholders?	634
(B) A.2	**Equitable treatment of shareholders**	
	Notice of AGM	
(B)A.2.1	Does the company release its notice of AGM (with detailed agendas and explanatory circulars), as announced to the Exchange, at least 28 days before the date of the meeting?	https://www.bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan-RUPS-Tahunan-Tahun-Buku-2023-ENG.pdf Halaman 1 dan 4

(B) B. Sustainability and Resilience

No.	Principles and Recommendations	Page
(B) B.1		
(B) B.1.1	Does the company disclose how it manages climate-related risks and opportunities?	Sustainability Report page 39-43

No.	Principles and Recommendations	Page
(B) B.1.2	Does the company disclose that its Sustainability Report / Sustainability Reporting is externally assured?	Yes, Sustainability Report page 150-154
(B) B.1.3	Does the company disclose the engagement channel with stakeholder groups and how the company responds to stakeholders' ESG concerns?	Sustainability Report page 147-149
(B) B.1.4	Does the company have a unit / division / committee who is specifically responsible to manage the sustainability matters?	Sustainability Report page 133
(B) B.1.5	Does the company disclose board of directors/commissioners' oversight of sustainability-related risks and opportunities?	Sustainability Report page 17, 133
(B) B.1.6	Does the company disclose the linkage between executive directors and senior management remuneration and sustainability performance for the previous year?	775
(B) B.1.7	Is the company's Whistle Blowing System managed by independent parties / institutions?	1080

(B) C. Disclosure and transparency

No.	Principles and Recommendations	Page
(B) C.1	**Quality of Annual Report**	
(B) C.1.1	Are the audited annual financial report /statement released within 60 days from the financial year end?	300 https://www.idx.co.id/en/listed-companies/financial-statements-and-annual-report/

(B) D. Responsibilities of the Board

No.	Principles and Recommendations	Page
(B) D.1	**Board Competencies and Diversity**	
(B) D.1.1	Does the company have at least one female independent director/commissioner?	100-111, 655
(B) D.1.2	Does the company have a policy and disclose measurable objectives for implementing its board diversity and report on progress in achieving its objectives?	788-789
(B) D.2	**Board Structure**	
(B) D.2.1	Is the Nominating Committee comprise entirely of independent directors/commissioners?	814
(B) D.2.2	Does the Nominating Committee undertake the process of identifying the quality of directors aligned with the company's strategic directions?	772
(B) D.3	**Board Appointments and Re-Election**	
(B) D.3.1	Does the company use professional search firms or other external sources of candidates (such as director databases set up by director or shareholder bodies) when searching for candidates to the board of directors/commissioners?	772
(B) D.4	**Board Structure & Composition**	
(B) D.4.1	Do independent non-executive directors/commissioners make up more than 50% of the board of directors/commissioners for a company with independent chairman?	113, 699
(B) D.5	**Risk Oversight**	
(B) D.5.1	Does the company disclose that its Board identified key risk in relation to information technology including disruption, cyber security, and disaster recovery, to ensure that such risks are managed and integrated into the overall risk management framework?	444
(B) D.6	**Board Performance**	
(B) D.6.1	Does the company have a separate board level Risk Committee?	826-830

Implementation of Corporate Governance Principles for Banks in Accordance With Basel Committee on Banking Supervision Standards [ACGS: C.26]

BNI has implemented the principles of bank governance in accordance with the Basel Committee on Banking Supervision Standards, which encompass 12 principles. In 2024, the implementation of these principles at BNI is outlined in the following table:

Explanation of Basel Committee on Banking Supervision Standard Principles	Implementation at BNI	Disclosure in Annual Report 2024
Principle 1: Responsibilities of the Board of Commissioners		
The Board of Commissioners has responsibilities that include: approval and supervision of the implementation of business strategies, governance structure and mechanisms, and corporate culture.	The Board of Commissioners has duties, responsibilities, and authority as outlined in the BNI Board of Commissioners Charter. This provision was ratified through the Board of Commissioners Decree No. KEP/024/DK/2024 dated October 21, 2024, regarding the Board of Commissioners Charter.	Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698
Principle 2: Qualifications and Composition of the Board of Commissioners		
Members of the Board of Commissioners must have the qualities appropriate to their duties and responsibilities, both individually and collectively. The Board of Commissioners must understand its role in supervision and the implementation of corporate governance, as well as being able to make decisions in a sound and objective manner.	The Board of Commissioners has duties and responsibilities both individually and collectively. All members of the Board of Commissioners must understand their role in supervision and the implementation of corporate governance, and be able to make decisions in a sound and objective manner. The appointment of members of the Board of Commissioners is carried out in accordance with applicable regulations. Each member has met the criteria and qualities required to perform their respective duties	Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 652-698; Sub-Chapter Nomination and Remuneration of the Board of Directors and Board of Commissioners, Page 768-787.
Principle 3: Structure and Mechanism of the Board of Commissioners		
The Board of Commissioners must establish the appropriate governance structure and practices in carrying out its duties and periodically review their effectiveness.	In BNI's Governance Structure, the Board of Commissioners is supported by Supporting Organs, which include the Board of Commissioners Secretary, Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. These Supporting Organs report directly to the Board of Commissioners and are appointed to ensure effective oversight. In 2024, the Board of Commissioners periodically assessed the effectiveness of the Supporting Organs to ensure that each committee maximizes its contribution to the implementation of good governance at BNI.	Chapter 7. Corporate Governance: Sub-Chapter Board of Commissioners, Page 652-698; Sub-Chapter Board of Commissioners Secretary, Page 858-861; Sub-Chapter Audit Committee, Page 792-810; Sub-Chapter Remuneration and Nomination Committee, Page 810-826; Sub-Chapter Risk Monitoring Committee, Page 826-839; Sub-Chapter Integrated Governance Committee, Page 839-857.

Explanation of Basel Committee on Banking Supervision Standard Principles	Implementation at BNI	Disclosure in Annual Report 2024
Principle 4: Board of Directors		
Under the direction and supervision of the Board of Commissioners, the Board of Directors is able to manage the Bank's activities in accordance with the business strategy, risk appetite, remuneration policy, and other policies approved by the Board of Commissioners.	The corporate governance mechanism at BNI has been effectively implemented in compliance with laws and regulations as well as national and global best standards. The Board of Commissioners oversees the management of the company by the Board of Directors, which is tasked with implementing good governance principles. Every policy underpinning BNI's operational activities requires approval from the Board of Commissioners. The effectiveness of this governance positively impacts the achievement of targets and the improvement of the Bank's performance.	Chapter 7. Corporate Governance: Sub-Chapter Commitment to Governance Implementation, Page 605-609; Sub-Chapter Continuous Improvement in GCG Implementation Quality, Page 615-629; Sub-Chapter Board of Directors, Page 703-762.
Principle 5: Business Group Governance Structure		
In a business group, the Board of Commissioners of the parent company has overarching responsibility for the group and must ensure the establishment and implementation of sound governance practices concerning the group's structure, business, and risks. The Board of Commissioners and the Board of Directors must understand the organizational structure of the group and the risks it faces.	As the primary entity in the Financial Conglomerate, BNI has five subsidiaries that are members of the conglomerate. To support effective management, BNI has implemented Integrated Governance, Integrated Risk Management, and Integrated Minimum Capital Adequacy Requirements. The Board of Commissioners of BNI has also established an Integrated Governance Committee comprising representatives from all entities within the financial conglomerate. As the main entity, BNI has developed an Integrated Governance Guideline, Integrated Risk Management Policy and Framework, and Integrated Compliance and Internal Audit Guidelines. These policies are implemented by all subsidiaries within the BNI Financial Conglomerate, provided their application does not conflict with more specific regulations applicable to each subsidiary.	Chapter 7. Corporate Governance: Sub-Chapter Integrated Governance Committee, Page 839-857; Sub-Chapter Integrated Internal Audit Unit (SKAIT), Page 925-928; Sub-Chapter Integrated Risk Management Governance, Page 971-977; Sub-Chapter Implementation of Integrated Governance, Page 1095-1103.
Principle 6: Risk Management Function		
The Bank must have a high-quality, independent risk management function with competent resources and access to the Board of Commissioners.	BNI's risk management strategy is implemented in an integrated manner with its business strategy, using a proactive and forward-looking approach. The goal is to maximize value for shareholders, manage capital comprehensively, and ensure sustainable profitability and business growth. The Enterprise Risk Management (ERM) Division serves as both the Risk Management Work Unit (SKMR) and the Integrated Risk Management Work Unit (SKMRT). In BNI's organizational structure, the ERM Division reports directly to the Director of Risk Management, overseeing the Risk Management and Integrated Risk Management functions. In carrying out its duties, the Risk Management Work Unit has the authority to escalate issues to the Risk Management Committee & Anti-Fraud Sub Risk Management Committee (KRA-RMC) or to the Director responsible for the Risk Management function. Meanwhile, the Integrated Risk Management Work Unit escalates issues to the Integrated Risk Management Committee or the Director overseeing the Integrated Risk Management function.	Chapter 7. Corporate Governance: Sub-Chapter Risk Management System, Page 946-970; Sub-Chapter Integrated Risk Management Governance, Page 971-977.

Explanation of Basel Committee on Banking Supervision Standard Principles	Implementation at BNI	Disclosure in Annual Report 2024
	The organizational structure of BNI's Risk Management can be found in the 2024 Annual Report in the sub-chapter related to Risk Management.	
Principle 7: Identification, Monitoring and Control of Risks		
Risks must be identified, monitored, and controlled across all of the Bank's activities. The quality of risk management infrastructure and internal controls must be able to adapt to changes in the Bank's risk profile, external risk conditions, and industry practices.	BNI implements a comprehensive and continuous risk management process, encompassing risk identification, measurement, monitoring, and control across all material risk factors. This implementation is supported by a reliable Risk Management Information System. The risk identification process at BNI is carried out proactively to analyze the sources, likelihood of risk occurrence, and its impact on the company. Key aspects of this process include: 1. Periodic risk identification; 2. Utilizing methods or systems to identify risks in all products and business activities; 3. Conducting specific risk identification for new products and activities before they are introduced or executed. Risk measurement aims to determine the magnitude of risk exposure as a basis for control and to ensure capital adequacy. Measurement is conducted quantitatively and/or qualitatively in accordance with methods set by the regulator or internal methods if no specific regulations exist. Risk measurement at BNI also includes stress testing for credit, market, and liquidity risks to anticipate extreme conditions. Risk monitoring ensures that risks are being properly managed, including monitoring risk mitigation and established risk limits. Monitoring is conducted by the Operational Work Unit as the risk owner and the Risk Management Work Unit as the Risk Control Unit. Risk control at BNI aims to manage risks that could disrupt the company's business sustainability. The strategies applied include risk mitigation, risk acceptance, risk avoidance, and risk transfer. Additionally, BNI continues to develop its Risk Management Information System to support the processes of risk identification, measurement, monitoring, and control. This system ensures the availability of accurate, complete, timely, and reliable information, thereby supporting Management in decision-making to respond to changes in risk profiles, industry practices, and external risk conditions.	Chapter 7. Corporate Governance: Sub-Chapter Risk Management System, Page 946-970; Sub-Chapter Integrated Risk Management Governance, Page 971-977.

Explanation of Basel Committee on Banking Supervision Standard Principles	Implementation at BNI	Disclosure in Annual Report 2024
Principle 8: Risk Communication		
Effective implementation of risk governance requires accurate risk communication within the Bank's environment, both across organizational units and through reporting to the Board of Commissioners and the Board of Directors.	In implementing risk management, BNI emphasizes the importance of aligning business strategies and objectives with risk management strategies and risk appetite. The risk management strategy consists of four main components: 1. Acceptable risk levels (risk appetite) and risk tolerance; 2. Risk management principles and policies; 3. Risk governance; 4. Types of risk exposures and market conditions. The establishment of the risk management strategy is regulated through governance, which includes: 1. Risk management strategy as the foundation for determining business strategy, outlined in BNI's Annual Business Plan (RBB) submitted annually to the Regulator; 2. The risk management strategy is developed by the Risk Management Work Unit, decided by the Board of Directors through the Risk Management & Anti-Fraud Committee Meetings in the field of Risk Management, and approved by the Board of Commissioners. The Board of Directors plays a role in communicating the risk management strategy to all Divisions/Work Units and conducting periodic reviews to adjust to changes in business strategy. This process also considers developments in economic conditions, banking business trends, regulatory changes, and their impact on the Bank's financial performance.	Chapter 7. Corporate Governance: Sub-Chapter Risk Management System, Page 946-970; Sub-Chapter Integrated Risk Management Governance, Page 971-977.
Principle 9: Compliance		
The Board of Commissioners is responsible for overseeing management concerning the Bank's compliance risk. The Board of Commissioners must establish the compliance function and approve policies and processes for identifying, assessing, monitoring, reporting, and advising on compliance risks.	The supervisory function of the Board of Commissioners over the Bank's compliance risk is carried out through the Audit Committee to ensure the strict application of prudential principles. Through this oversight, the Board of Commissioners ensures that all Bank activities and policies align with applicable laws and regulations, including those issued by financial and banking authorities. The Board of Commissioners conducts periodic reviews and assessments of the compliance function to identify potential risks and ensure that compliance risk mitigation measures are adequately implemented. This process also involves monitoring the implementation of recommendations provided by relevant work units and reviewing compliance reports to detect potential violations early. Furthermore, the Board of Commissioners evaluates the effectiveness of the compliance function in supporting compliance targets, which are expected to minimize legal risks and maintain the Bank's reputation.	Chapter 7. Corporate Governance: Sub-Chapter Board of Commissioners, Page 652-698; Sub-Chapter Risk Monitoring Committee, Page 826-839; Sub-Chapter Compliance Function, Page 928-937; Sub-Chapter Risk Management System, Page 946-970; Sub-Chapter Integrated Risk Management Governance, Page 971-977.

Explanation of Basel Committee on Banking Supervision Standard Principles	Implementation at BNI	Disclosure in Annual Report 2024
Principle 10: Internal Audit		
The internal audit function must report independent assurance activities to the Board of Commissioners and support both the Board of Commissioners and the Board of Directors in promoting effective governance processes and the Bank's long-term health.	BNI has established an Internal Audit Work Unit operated by the Internal Audit Unit, whose primary responsibilities are to perform assurance and consulting functions. The objective of this function is to provide added value and encourage improvements in the quality of controls, risk management, and corporate governance independently and objectively. Through assurance activities, the Internal Audit Unit evaluates the reliability of internal control processes and compliance with established policies. Additionally, the consulting function provides guidance to work units in formulating effective steps to enhance risk management and strengthen corporate governance. This process is carried out in accordance with the principles of independence and objectivity, as outlined in the Annual Report, which details the roles and contributions of the Internal Audit Unit in supporting BNI's strategic objectives.	Chapter 7. Corporate Governance: Sub-Chapter Internal Audit Unit, Page 909-925; Sub-Chapter Integrated Internal Audit Work Unit (SKAIT), Page 925-928; Sub-Chapter Internal Control System, Page 938-945.
Principle 11: Compensation		
The Bank's remuneration structure must support the implementation of corporate governance and risk management.	BNI has a Nomination and Remuneration Committee established and functioning in accordance with applicable laws and regulations. This committee is responsible for establishing remuneration policies and mechanisms aligned with the principles of good corporate governance (GCG) and risk management. With the support of the Nomination and Remuneration Committee, BNI ensures that remuneration policies not only support sustainable performance achievement but also strengthen risk management aspects. The committee also ensures that remuneration policies are aligned with the company's long-term objectives, balancing rewards and risks while considering the interests of shareholders, employees, and other stakeholders.	Chapter 7. Corporate Governance: Sub-Chapter Nomination and Remuneration of the Board of Commissioners and Directors, Page 768-787; Sub-Chapter Nomination and Remuneration Committee, Page 768-787.
Principle 12: Disclosure and Transparency		
The governance implementation of the Bank must be carried out transparently to Shareholders, Depositors, other relevant Stakeholders, and Market Participants.	BNI is committed to applying the principles of good corporate governance, particularly transparency. By prioritizing open information disclosure, BNI ensures that all company-related information is conveyed to shareholders and other stakeholders accurately and in a timely manner, in compliance with applicable laws and regulations.	Chapter 7. Corporate Governance: Sub-Chapter Transparency of Financial and Non-Financial Conditions, Page 1054; Sub-Chapter Transparency in Report Submission, Page 1091.

08

Social & Environmental Responsibility

Commitment and Policy for Implementing Social and Environmental Responsibility Programs 1154

Special Assignment 1167



Social & Environmental Responsibility


BNI

Commitment and Policy for Implementing Social and Environmental Responsibility Programs [ACGS B.4.4]

COMMITMENT AND POLICY

PT Bank Negara Indonesia (Persero) Tbk, also known as BNI, is committed to always contributing to continuously helping to provide benefits to the economy, society, and environment with principles that are more integrated, focused, measurable in impact and accountable. This commitment is part of BNI's business strategy for attaining sustainability and business continuity.

As a State-Owned Enterprise (BUMN), BNI serves as a key development agent, playing a crucial role in driving economic growth and advancing the achievement of the Sustainable Development Goals (SDGs), a global issue that is on the agenda of the Indonesian Government. In fulfilling this role, BNI consistently implements Social and Environmental Responsibility (TJSL) programs and activities, integrating them into all aspects of its operations to generate positive impact on both the economy and the banking industry.

The implementation of BNI's TJSL program is driven by the understanding that sustainable success is not solely dependent on management and operational performance, but is also supported by the surrounding community and environment. This is in line with the spirit of SDG, namely development that ensures the continuous improvement of the community's economic welfare, development that maintains the sustainability of social life, development that preserves environmental quality, and development that guarantees justice and the implementation of governance that can sustain the improvement of quality of life from one generation to the next.

The BNI TJSL Program reflects the commitment and dedication of State-Owned Enterprises (BUMN) to sustainable development, in accordance with the Regulation of the Minister of BUMN No. PER-1/MBU/03/2023 regarding Special Assignments and BUMN Social and Environmental Responsibility Programs. Aligned with the Bank's mission and Environmental, Social, and Governance (ESG) principles, the BNI TJSL Program is designed to comply with relevant laws and regulations, namely:



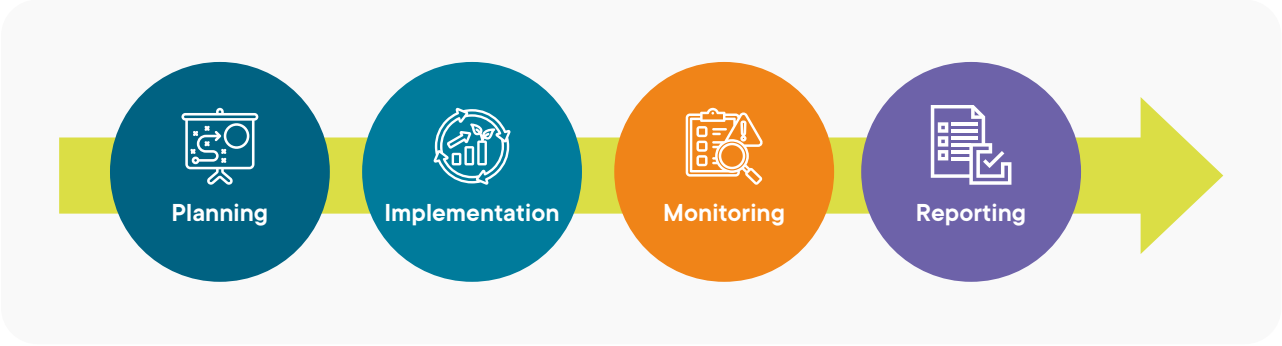
1. Law No. 40 of 2007 concerning Limited Liability Companies as last amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation;
2. Government Regulation No. 47 of 2012 concerning Social and Environmental Responsibility of Limited Liability Companies;
3. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-1/MBU/03/2023 dated March 3, 2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises.
4. Regulation of the Financial Services Authority No. 51/POJK.03/2017 dated July 18, 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.

In line with the above guidelines, BNI has established policies that serve as the basis for fulfilling the transparency of information regarding the impact of the bank's decisions and business activities on society and the environment through transparent and ethical behavior. The policies for implementing BNI's Social and Environmental Responsibility (TJSL) program include:

1. Corporate Guideline No. IN/002/CSE/0002 dated February 1, 2024, related to the Social and Environmental Responsibility (TJSL) program;
2. Corporate Guideline for Community Development Management No. IN/341/KMP/001 dated July 17, 2017;
3. Corporate Guideline for Environmentally Friendly Lifestyle No. IN/418/KMP/001 dated September 12, 2017.

BNI systematically and integratively implements the TJSL program to ensure its successful execution, achievement, and the effective management of its impacts, in alignment with the program's goals and priorities. The management of BNI's TJSL program follows these key stages:

1. Planning;
2. Execution;
3. Monitoring; and
4. Reporting.



TJSL PROGRAM OBJECTIVES

The objectives of the TJSL program align with the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-1/MBU/03/2023 dated March 3, 2023, regarding Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises, which are:

1. To provide benefits for economic development, social development, environmental development, as well as legal and governance development for the company;
2. To contribute to creating added value for the company with integrated, targeted, measurable, and accountable impacts;
3. To support micro and small businesses to become more resilient and independent, as well as the surrounding communities.

TJSL PROGRAM PRINCIPLES

The TJSL program is implemented based on the following principles:

1. Integrated, based on risk analysis and business processes that are connected to stakeholders;
2. Targeted, with a clear direction to achieve company goals;

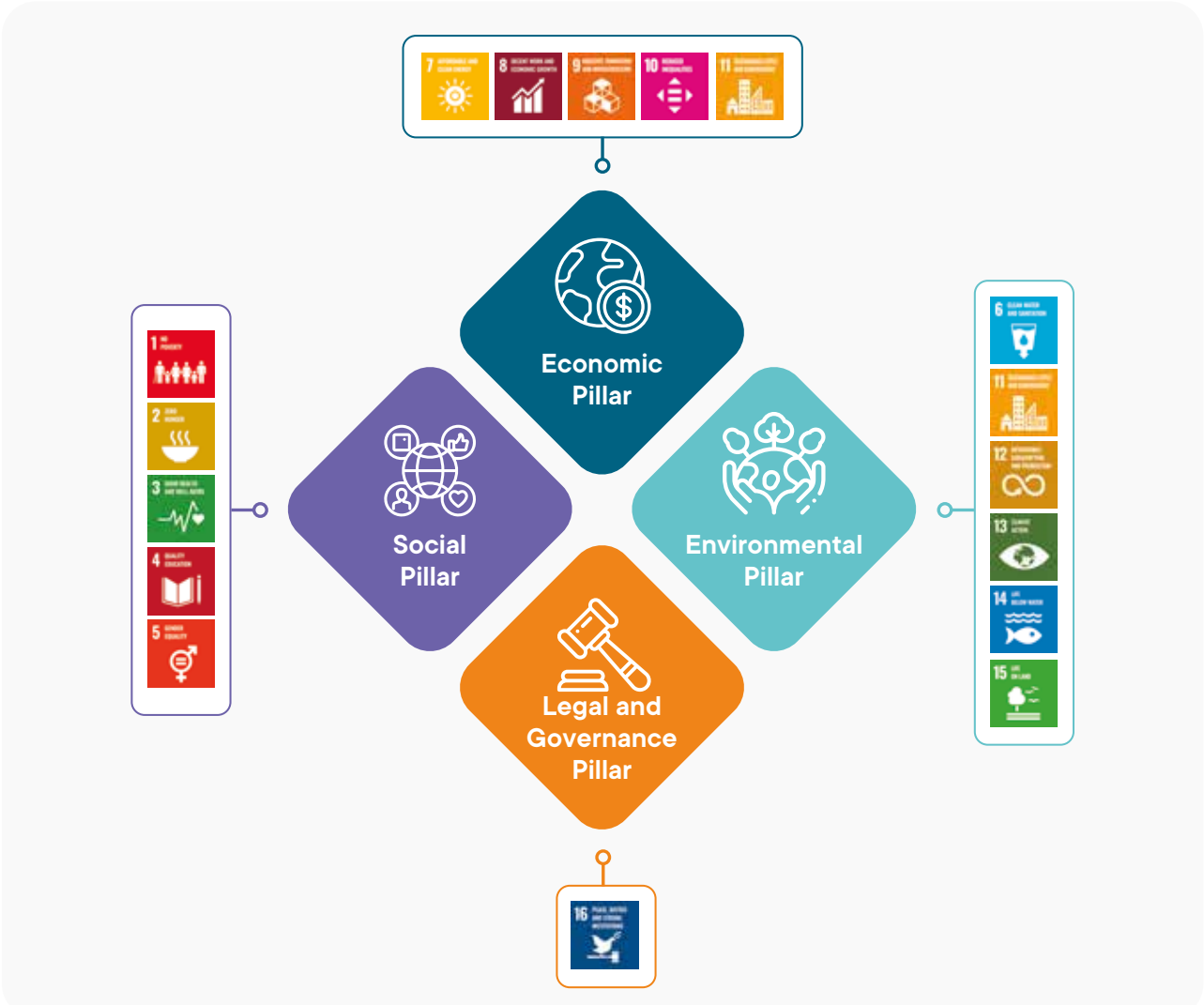
3. Measurable impact, having a contribution that provides benefits and creates change or added value for stakeholders and the company; and
4. Accountability, ensuring responsibility to avoid misuse or deviations.

MAIN TJSL PILLARS

The TJSL program is also implemented based on four main pillars:

1. Social, to achieve the fulfillment of basic human rights in a fair and equal manner to improve the welfare of all people;
2. Environmental, for the sustainable management of natural resources and the environment as a support for all life;
3. Economic, to achieve quality economic growth through sustainable job and business opportunities, innovation, inclusive industries, adequate infrastructure, affordable clean energy, and supported partnerships; and
4. Law and Governance, to ensure legal certainty and effective, transparent, accountable, and participatory governance to create security stability and establish the rule of law.

These four main pillars encompass the 17 Sustainable Development Goals (SDGs), which are: (1) No Poverty; (2) Zero Hunger; (3) Good Health and Well-being; (4) Quality Education; (5) Gender Equality; (6) Clean Water and Sanitation; (7) Affordable and Clean Energy; (8) Decent Work and Economic Growth; (9) Industry, Innovation and Infrastructure; (10) Reduced Inequalities; (11) Sustainable Cities and Communities; (12) Responsible Consumption and Production; (13) Climate Action; (14) Life Below Water; (15) Life on Land; (16) Peace, Justice and Strong Institutions; (17) Partnerships for the Goals.



MAIN FOCUS OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS AND COMPANY SUPPORT TOWARDS SUSTAINABLE DEVELOPMENT GOALS

BNI runs Social and Environmental Responsibility (TJSL) programs as a form of support for achieving various Sustainable Development Goals. The implementation of the TJSL Program is a real manifestation of the company's responsibility to all stakeholders. Through the implementation of various development activities in the TJSL Program, the Company shows its determination to meet the present but is carried out without reducing, sacrificing and destroying the fulfillment of future needs. Through the implementation of these TJSL programs, the Company shows that current business development is carried out by prioritizing performance alignment in economic, social and environmental aspects.

The BNI TJSL Program is run with the target beneficiaries being the community around the company's operational activities and the wider community selectively. During 2024, BNI refers to the Letter of the Ministry of SOEs where the Implementation of the SOE TJSL Program in the form of assistance and/or other activities is carried out by prioritizing focus on education, environment, and development of Micro and Small Enterprises (UMK).

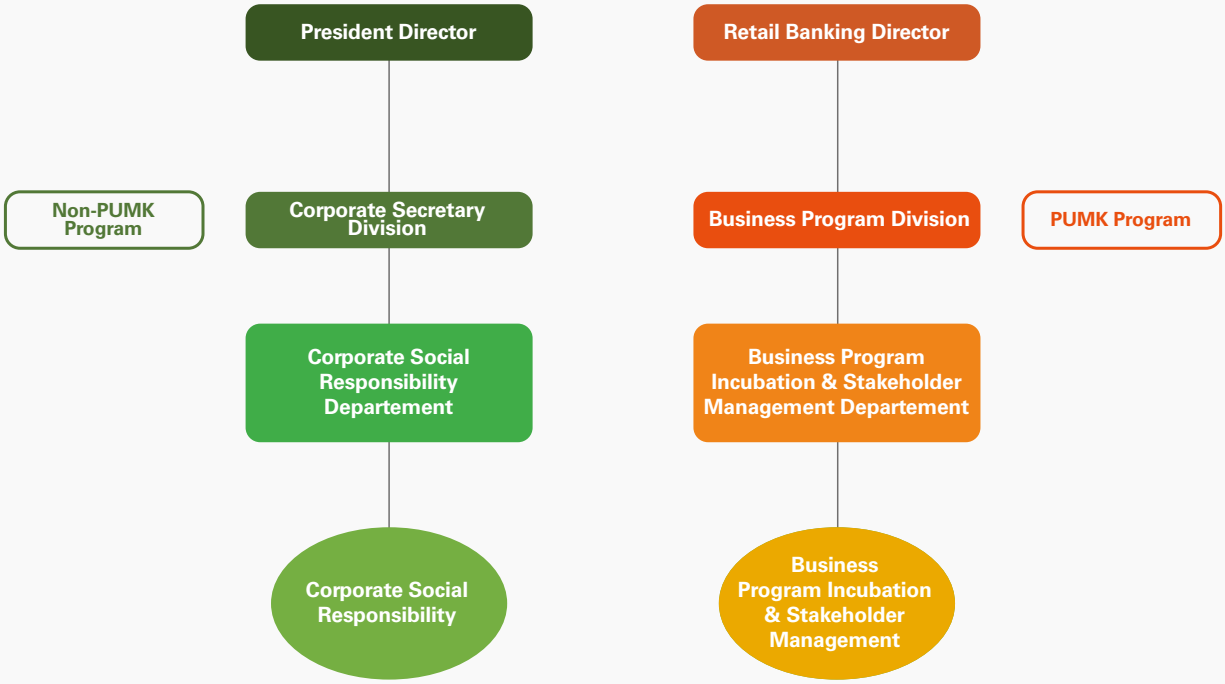
SCOPE OF BNI TJSL

The BNI TJSL Program supports BNI's Sustainability Pillars, especially BNI for Society and BNI for the Environment as well as the Achievement of Sustainable Development Goals (SDG).

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAM MANAGEMENT

The implementation of the BNI TJSL program is divided into several Divisions with responsibilities that are in accordance with the program category. Currently, the management of the BNI TJSL program is in the Corporate Secretary Division (CSE) which is directly responsible to the President Director and the Business Program Division (SBP) which is responsible to the Director of Retail Banking, with the organizational structure attached below.

Organizational Structure of TJSL Program Manager



STRATEGIES AND PROGRAMS OF ACTIVITIES FOR IMPLEMENTING SOCIAL AND ENVIRONMENTAL RESPONSIBILITY BASED ON THE CONCEPT OF SUSTAINABLE FINANCE

BNI is committed to creating a positive impact by advancing the social conditions of communities and society connected to BNI through the implementation of relevant and long-term TJSL programs. The strategies and activities for executing BNI's TJSL are based on the concept of sustainable finance, taking into account stakeholder expectations, legal compliance, and alignment with international behavioral norms.

BNI avoids implementing TJSL programs solely for enhancing its public image or business environment reputation. The primary reference for BNI is to understand the objectives and positive impacts of the TJSL programs, ensuring that their implementation is ideal, objective, targeted, and sustainable, in line with the principles of sustainable finance and the achievement of the Sustainable Development Goals.

Furthermore, BNI views the TJSL program as a vital element that goes beyond merely fulfilling POJK 51/2017. It is also aligned with BNI's Five Pillars of Sustainability, fostering harmonious and mutually beneficial relationships with the environment, communities, and stakeholders locally, nationally, and globally, while creating a positive impact on the mindset and quality of life in the surrounding environment.

Information regarding BNI's TJSL implementation program activities is as follows:

1. Micro and Small Business Funding Program (PUMK)
   a. Focus on distributing in clustering by establishing synergistic cooperation with BUMN/BUMD/Pemda that manage fostered partners or MSME actors;
   b. Cooperate with Community Empowerment Institutions (LPM) that foster MSME actors.
2. Social and Environmental Responsibility Program (Non PUMK)
   a. Distribute TJSL Program funds in accordance with the provisions;
   b. Collaborate with professional and competent partners to organize community empowerment programs;
   c. Collaborate with community groups to improve program quality;
   d. Increase the capacity and capabilities of fostered partners through the provision of education, training, internships, marketing, and other forms of assistance;
   e. Implementation of the Social and Environmental Responsibility Program prioritizes the fields of Education, Environment and Development of Micro and Small Enterprises (UMK).

BNI also implements TJSL activity programs which are divided into 3 (three) major programs, namely:

1. External Initiation Program
   This is a program initiated by external/ stakeholders aimed at BNI, with a specific purpose and does not have a direct impact on BNI.
2. Strategic Program
   This is a program initiated by BNI internally to achieve certain goals that are beneficial for BNI and all stakeholders.
3. National Development Support Program
   This is a program initiated by BNI's main stakeholders, so it is considered important to be implemented.

BUDGET AND FINANCING REALIZATION FOR SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS IN 2024

BNI determines the amount of the TJSL program implementation budget by referring to the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-1/MBU/3/2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises.

TJSL PUMK PROGRAM

Based on the Letter of the Minister of SOEs No. S-721/MBU/11/2022 dated November 10, 2022, there are directions regarding the optimization of PUMK funds, namely the appointment of PT Bank Rakyat Indonesia Persero Tbk (BRI) as the manager of the PUMK Program Cooperation. Understanding this, BNI has signed a Cooperation Agreement between BNI and BRI as the manager of the PUMK Program Cooperation, namely PKS No. B.21/MBD/12/2022 and No. SBP/1/018 dated December 13, 2022 with a PKS period of 5 (five) years from 2022 to 2027. In accordance with the direction of the Minister of SOEs, the distribution of PUMK will be focused by BRI as the manager of the PUMK Program Cooperation. When the validity period of the cooperation agreement has ended, BRI will return the balance of the PUMK Program funds owned (cash funds) and deposit the PUMK return funds in stages to BNI.

NON-PUMK TJSL PROGRAM

BNI also implements a TJSL program divided into 4 (four) main pillars, namely Social, Environmental, Economic and Legal and Governance. In 2024, the achievement of budget absorption through the BNI TJSL program reached IDR129.9 billion or 100%. The realization of the BNI TJSL Program based on the Main Pillars and Sustainable Development Goals (SDGs) is:

Budget Realization of The TJSL Program Based on the 4 (Four) Main Pillars and Sustainable Development Goals (SDGs) as of December 31, 2024

No	Sustainable Development Goals (SDG)	Realization (IDR Billion)
SOCIAL PILLAR		
1	SDG 1 (No Poverty)	3.3
2	SDG 2 (Zero Hunger)	48.9
3	SDG 3 (Healthy & Well-Being)	15.7
4	SDG 4 (Quality Education)	24.0
	Sub Total	**91.9**
ECONOMIC PILLAR		
1	SDG 7 (Affordable & Clean Energy)	0.1
2	SDG 8 (Decent Work & Economic Growth)	10.3
3	SDG 9 (Industry, Innovation & Infrastructure)	5.3
4	SDG 10 (Reduced Inequality)	0.3
	Sub Total	**16.0**
ENVIRONMENTAL PILLAR		
1	SDG 6 (Clean Water & Sanitation)	3.1
2	SDG 11 (Sustainable Cities & Human Settlements)	14.9
3	SDG 12 (Consumption & Responsible Production)	0.3
4	SDG 13 (Climate Action)	0.2
5	SDG 14 (Life Below Water)	1.1
6	SDG 15 (Life on Land)	2.5
	Sub Total	**22.1**
Grand Total		**129.9**

ACTIVITIES, INVESTMENTS OR DONATIONS TO COMMUNITIES OR REGISTERED NON-PROFIT ORGANIZATIONS

As part of its commitment to social responsibility, BNI has implemented various activities and investments that focus on community empowerment and support registered non-profit organizations. Through sustainable programs in various fields, BNI strives to provide a real positive impact on society. In addition, BNI also distributes donations and assistance to non-profit organizations that play a role in improving social welfare.

PERFORMANCE OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS

BNI consistently implements sustainable finance and increases support for achieving the Sustainable Development Goals (SDGs), one of which is through the implementation of the TJSL activity program. BNI continues to strive to support the TBP achievement initiative as part of efforts to meet global sustainable development targets as stated in the formulation of the Sustainable Development Goals (SDGs) which include 17 goals. BNI, which acts as a financing institution, also has an understanding of the principles of sustainable development in order to create a better future.

The achievements of BNI's contribution or support to the SDG that are appropriate and relevant to BNI's activities and business fields are as follows:

Achievements of BNI's TJSL Program Support to The Sustainable Development Goals (SDGs)

No	Sustainable Development Goals (SDG)	(SDG) BNI Achievement
1	SDG 1 (No Poverty)	Natural disaster emergency response assistance, including floods, earthquakes, and volcanic eruptions throughout Indonesia.
2	SDG 2 (Zero Hunger)	Food security assistance for people in need throughout Indonesia.
3	SDG 3 (Healthy & Well-Being)	Health assistance, including ambulances and health infrastructure.
4	SDG 4 (Quality Education)	Education assistance, including scholarships and education infrastructure.
5	SDG 6 (Clean Water & Sanitation)	Clean water and sanitation assistance, including the provision of clean water boreholes.
6	SDG 7 (Energi Bersih & Terjangkau)	Renewable energy assistance, including street lighting using solar panels.
7	SDG 8 (Decent Work & Economic Growth)	Infrastructure assistance in supporting MSMEs, including MSME equipment infrastructure.
8	SDG 9 (Industry, Innovation & Infrastructure)	Infrastructure assistance, including roads and bridges.
9	SDG 10 (Reduced Inequality)	Assistance in supporting the reduction of inequality, including assistance to persons with disabilities.
10	SDG 11 (Sustainable Cities & Human Settlements)	Assistance for worship infrastructure for all religious communities.
11	SDG 12 (Consumption & Responsible Production)	Assistance for responsible consumption, including the use of goods that are no longer used through the textile waste management programme.
12	SDG 13 (Climate Action)	Assistance related to the impact of climate change, including waste management programmes.
13	SDG 14 (Life Below Water)	Assistance related to marine ecosystems, including mangrove seedling planting.
14	SDG 15 (Life on Land)	Assistance related to land ecosystems, including rhino and orangutan conservation.

IMPLEMENTATION OF BNI'S TJSL PROGRAM

In accordance with ISO 26000, BNI administers the TJSL program using the CSV (Creating Share Value) concept, which has the features of benefit and value sharing. This complies with Ministry of SOE Regulation Number PER-1/MBU/03/2023. Therefore, it is anticipated that the TJSL program, which is run by BNI, will have the greatest possible positive effects on social and environmental development, help the company create value, and support the growth of more resilient and independent micro and small businesses in the community.

Through work units spread throughout Indonesia, BNI is committed to community development and environmental preservation activities in order to achieve the Sustainable Development Goals through the BNI Berbagi Program.

Until December 31, 2024, BNI has implemented the TJSL program with a creating shared value approach, with the following details:

Program	Impact to the Company
KAWAN BNI Program	a. Strengthening the local economy to become BNI's future customers; b. Community development so that they can enter the Company's value chain. c. Helping Achieve SDGs
Pejompongan Flyover Canteen Development Project	a. Arrangement of UMK in the BNI building environment b. Development of UMK so that it can enter the Company's value chain. c. Helping to Achieve SDGs
Swadharma Coffee Shop Development Project	
Equatorial Coffee Trail Program	a. Development & empowerment of coffee farmers who are BNI customers b. Helping to Achieve SDGs

Outstanding Programs

BNI remains committed to continuously innovating in the development of outstanding programs that deliver a positive impact on society and the environment. Below is an overview of the key programs implemented by BNI as part of its TJSL activities in 2024.

Rumah BUMN

The Rumah BUMN serves as a platform for the collaboration of State-Owned Enterprises (BUMNs) in shaping the digital economy ecosystem by nurturing micro, small, and medium enterprises (MSMEs) to enhance their capacity and capabilities. MSMEs supported by Rumah BUMN receive empowerment tailored to their respective levels of entrepreneurship. The presence of Rumah BUMN acts as a catalyst for MSMEs to elevate to the next level, guiding them towards Go Modern (a shift in entrepreneurial mindset), Go Digital (utilizing social media), Go Online (embracing e-commerce), and Go Global (preparing for exports). Currently, BNI operates 23 Rumah BUMN locations, which serve as hubs for business development for over 6,215 MSME practitioners, providing more than 401 training sessions and facilitating the acquisition of 4,580 legal permits (including PIRT, NIB, Halal Certification, and BPOM).

KAWAN BNI Program

Drawing inspiration from the word "Kawan," which means friend or companion, BNI has created a community empowerment program called the Kawan BNI Program. Through this initiative, the company strives to be a friend/companion to the community, working collaboratively to maximize the impact of community empowerment programs and projects, ultimately enhancing the quality of life for the people.

The Kawan BNI Program targets villages throughout Indonesia to develop superior businesses from each village. This program aims to improve the economic capacity of the community. BNI continues to provide contributions and support to develop potential (Economy, HR) so that they can become independent villages and add/create jobs for the surrounding community.

Throughout 2024, BNI will develop 4 Kawan BNI Program, namely Wringin Putih Village (Banyuwangi, East Java), Ponggok Tourism Village (Klaten, Central Java), Lembah Asri Tourism Village (Purbalingga, Central Java) and Bubu Attagamu Village (East Flores, NTT).

BNI Graduate Scholarship Program

To implement the State-Owned Enterprises Social and Environmental Responsibility Program, BNI launched a scholarship initiative aimed at promoting equal opportunities for all segments of society to access higher education at the university level, in alignment with Sustainable Development Goal (SDG) No. 4, which focuses on Quality Education.This program also serves to recognize the contributions of TAD (Outsourced Workers) employees, including attendants, drivers, security guards, and cleaning staff, who have dedicated their service to BNI.

MSME Certification

BNI is committed to implementing a long-term program in developing MSMEs through MSME halal certification with a target of 1,000 MSMEs. The implementation of MSME halal certification includes Pre-Audit or Certification Preparation, Product Halal Examination and Halal Certification Application.

Food Security Program

In 2024, the effects of El Niño will persist in Indonesia. This climate phenomenon, marked by periodic warming of sea surface temperatures in the central and eastern tropical Pacific Ocean, brings a range of challenges to Indonesia, including drought, water shortages, crop failures, and widespread forest and land fires. In response, BNI is more committed than ever to addressing issues related to food security and hunger within the community.

As an implementation of food security, BNI distributes food packages packaged into special programs, namely the food security program in the context of the Month of Ramadan 1445 H and the food security program in the context of handling the impact of El Nino in Indonesia.

The implementation of this program is by distributing food packages to the community throughout BNI's work area routinely every year through a series of religious holiday celebrations.

In 2024, BNI distributed a total of 619,362 food packages. This includes 78,000 packages allocated for various distribution programs, with 541,362 packages provided as part of the 1445 H Ramadan Month initiative, alongside additional assistance aimed at mitigating the impact of El Nino and other related challenges.

The distribution of food packages through various institutions has been coordinated with local governments to ensure accurate data collection on the underprivileged individuals who are eligible to receive assistance. The impact of this food security program extends beyond providing essential aid; it fosters a sense of joy, alleviates the hardships of vulnerable communities -particularly those affected by El Nino in Indonesia - and contributes to the overall improvement of community welfare.

All food package distribution activities carried out by BNI pay attention to the principle of caution in their distribution so as not to provide double assistance to the basic food assistance provided by the government.

Cataract Surgery Program

Cataracts are the leading cause of blindness worldwide, yet they are preventable. The estimated incidence of cataracts is 0.1% per year, meaning one in every 1,000 people develops cataracts annually.

Given the data on the prevalence of cataracts, it is a shared responsibility among all parties, including the Government, to work together to prevent blindness caused by this condition. BNI recognizes that cataracts can significantly impact an individual's ability to perform daily activities. While surgery can remedy the condition, not everyone has access to quality healthcare facilities. In response, BNI has partnered with the Pundi Amal Peduli Kasih Foundation (YPP), SCTV, and Indosiar to launch the BNI Berbagi Program, which provides cataract surgeries across four locations in Eastern Indonesia, with a target of 450 surgeries during the 2023-2024 period.

Waste Management Program

Waste management, particularly household and tourism-related waste, remains a significant issue that requires ongoing attention. In response, BNI has contributed by providing waste management infrastructure in key tourist destinations, including Likupang in North Sulawesi, as well as Cikole Lembang and Cipanas Puncak in West Java. Additionally, BNI has supported the development of sanitation facilities in the Nusantara Capital City (IKN) - West Kalimantan.

Clean Water Management Program

Provision of Clean Water and Sanitation Facilities
Clean water and sanitation are basic human needs. Due to climate change, water has become a primary need for the community due to water shortages.

In 2024, several regions in Indonesia will experience a clean water crisis due to extreme drought, people rely on water from springs, but currently the water discharge is decreasing and coupled with the effects of a long drought, these springs are unable to meet the community's water needs, BNI is committed to supporting the provision of clean water and sanitation by providing clean water assistance from drilled wells in several affected areas of Indonesia such as Purwokerto, Serang Pandeglang & Cilegon - Banten, and Bogor - West Java.

BNI also provides assistance in the form of clean water and sanitation in the Banyuwangi Region - East Java in the form of assistance such as making drilled wells (clean water) and toilets for fishermen in the coastal areas of East Java.

Health Infrastructure

In 2024, BNI distributed 59 ambulance units across Indonesia. This ambulance assistance is provided in collaboration with licensed agencies in the social and health sectors, ensuring that the services reach the intended communities. The ambulances, supported by BNI, are offered free of charge, primarily benefiting the underprivileged.

As part of its BNI Berbagi health sector initiative, BNI has also supported the operations of the Waluya II Ship Hospital (RS) in conducting cataract surgeries in remote locations, particularly on isolated islands. The need for assistance arose from the requirement to transport medical equipment from external areas to support the ship's hospital services. To address this, BNI provided essential medical equipment for cataract surgeries, contributing to the delivery of healthcare services to communities aboard the Nusa Waluya II Ship Hospital (Tongkang).

Worship Facilities

In its efforts to build a nation with strong character and promote sustainable environmental development, BNI also contributes to the construction and renovation of places of worship across its operational areas. BNI provides support for these places of worship by offering infrastructure and essential facilities, ensuring that these spaces are conducive to the spiritual needs of diverse religious communities.

In 2024, BNI successfully assisted 123 places of worship across various religions, located throughout its operational areas, including West Sumatra, Bengkulu, Java, Bali, Maluku, and more. The tangible impact of this program includes fostering sustainable cities and communities, enhancing and refurbishing places of worship, and reinforcing

BNI's commitment and responsibility towards the surrounding communities. The support provided also contributes to creating a more comfortable and secure environment for congregations, facilitating their worship activities with peace of mind.

Educational Facilities

In 2024, BNI participated in efforts to create quality and quality education through assistance to 86 schools or educational institutions in BNI's working areas, such as the construction of school buildings, construction/renovation of classrooms, training, provision of Information and Communication Technology (ICT) facilities and infrastructure, provision of supporting learning facilities and infrastructure, provision of educational props, and others.

As another implementation in an effort to create quality education, BNI also distributed Educational Equipment Packages for the Underprivileged in a Special Program, namely Christmas Day, by distributing 17,000 educational packages throughout BNI's work areas.

The assistance that BNI has provided is spread throughout Indonesia, including West Java, Central Java, East Java, Bali, Riau, North Sumatra, and Maluku. The assistance that has been provided is expected to increase comfort for students and teachers in carrying out teaching and learning activities which are expected to participate in creating superior students in the future.

Teacher Certification Program, as and Financial Literacy and Education

In this initiative, BNI implemented a teacher certification program across five provinces: DKI Jakarta, Pekanbaru, East Kalimantan, Bali, and East Nusa Tenggara (NTT), with 1,000 teachers from 513 schools participating. This six-month program aims to support the Ministry of Education, Culture, Research, and Technology's mission to enhance teachers' capabilities. The program equips teachers with digital technology skills, creating a lasting positive impact on the education sector. As an added benefit, teachers will not only receive a nationally recognized certificate from the Ministry of Education, but also an international certification, the Microsoft Certified Educator, from Microsoft.

During the program, BNI also implements a financial education program in collaboration with the OJK. Educational materials include financial planning, the dangers of illegal online loans, and preventing online gambling. This program aims to improve financial literacy, make teachers role models, and build early awareness for students in wise and inclusive financial management.

Public Facilities and Infrastructure Assistance

Road Repair, Embankment Concrete, Food Court, Street Lighting (renewable energy), Sports Facilities and Infrastructure, and Bridges.

Emergency Response to Natural Disasters

Throughout 2024, natural disasters such as volcanic eruptions, flash floods, and landslides occurred in several regions of Indonesia, including West Sumatra, West Java, West Kalimantan, East Nusa Tenggara, and South Sulawesi, impacting the lives of local communities. Through its BNI Berbagi Disaster Response Program, BNI has provided assistance to 34 disaster-stricken locations across Indonesia. This support included the distribution of essential supplies such as food packages, cooking equipment, children's necessities, and other vital items to help those affected by the disasters.

Stunting Reduction Program and Nutritious Food

In line with the government's focus on accelerating the reduction of Stunting Prevalence in Indonesia, BNI also supports this policy by implementing various programs to improve nutrition, which are divided into short, medium and long-term plans. Until now, various programs have been implemented, including:

1. Toddler Food Package Assistance
2. Food Package for Pregnant and Breastfeeding Mothers Assistance
3. Provision of Nutritious Lunch
4. Posyandu Cadre Training
5. Stunting Prevention Training for Pregnant Women

The implementation of the program was carried out in various regions, namely Tasikmalaya, Jombang, Sidoarjo, DKI Jakarta, Semarang and Tegal. In the future, BNI continues to be committed to supporting government policies to encourage nutritional improvements in Indonesia.

Support for Geopark Area

According to UNESCO, a Geopark is an area that contains outstanding geological features, including archaeological, ecological, and cultural values, where local communities are actively involved in protecting and enhancing the function of natural heritage. The Ijen Geopark, or Ijen Earth Park, has officially joined the UNESCO Global Geoparks Network. This designation was made during the 10th UNESCO Global Geopark International Conference

in Marrakesh, Morocco. Meanwhile, the Rinjani Geopark has also been recognized by UNESCO as part of Indonesia's Geopark network. Located on Lombok Island, this Geopark encompasses Mount Rinjani, the second-highest volcano in Indonesia. The Rinjani Lombok Geopark's status as a member of the Global Network was officially announced on April 12, 2018.

BNI supports the development of Geoparks by facilitating the provision of camera traps, building prayer rooms, renovating toilets, managing waste, and making other improvements aimed at ensuring the safety and comfort of hikers.

Environment: Optimizing the Role to Protect the Earth

As a form of social concern and responsibility, BNI always strives to provide a positive impact on the environment by increasing the carrying capacity of the ecosystem and protecting flora and fauna species.

Employee Volunteering Program

In implementing CSR activities, BNI encourages its employees to be involved in donating their time and thoughts voluntarily. The implementation of this program has the following objectives: fostering togetherness among employees in helping the community, increasing employee loyalty to the company, creating a better work environment.

CSR programs that involve employees include the Tree Planting Program. In addition, the involvement of BNI Hi Movers in the TJSL Program is also in the food security program and the Religious Holiday Program, namely by cleaning, and participating in revitalizing places of worship.

Critical Land Rehabilitation Program in Teluk Pangpang, Banyuwangi

To support the preservation of mangrove forests with all their benefits, BNI planted +/- 165,000 mangrove seedlings in an area of 50 hectares (Ha) in Teluk Pangpang, Wringin Putih Village, Banyuwangi. Planting these mangrove seedlings not only improves the marine ecosystem, but also provides economic benefits to the village community, most of whom depend on marine products for their livelihoods. Not only planting, BNI is also actively involved in caring for the growth of mangrove trees together with local residents for 3 years.

In addition to Banyuwangi, BNI through the BNI Go Green Program carries out nursery, planting and maintenance activities on land that needs to be rehabilitated by involving the role of the community. BNI has reforested 167,347 trees in Indonesia throughout 2024.

Endangered Animal Conservation Program

Banking activities do not have a direct impact on environmental conservation or biodiversity. However, BNI remains committed to supporting the endangered fauna conservation movement in Indonesia. Biodiversity conservation plays a major role in helping the environmental ecosystem and reducing emissions produced.

Javanese Rhino Conservation

BNI continues its commitment to preserving Indonesia's biodiversity, particularly the Javan Rhino, a mission it has pursued in previous years. In 2024, BNI sustained its support for the conservation of the Javan Rhino in collaboration with the Ministry of Environment and Forestry, Ujung Kulon National Park Authority, and the Integrated Forest Alliance (ALeRT). This support includes the establishment of the Field School for Buffalo Livestock Management (SLPTK) and the continuation of Genetic Mapping of Individual Javan Rhinos. Both initiatives are crucial for ensuring the survival of the Javan Rhino in Ujung Kulon National Park (TNUK).

Kalimantan Orangutan Conservation

The orangutan and many other species in the tropical forests of Borneo are now facing the threat of extinction. The challenges they face are complex, with deforestation being one of the primary causes. The survival of Bornean orangutans is under severe threat, and the declining population poses a risk to the balance of the forest ecosystem.

Recognizing this critical situation, BNI continues to support orangutan conservation efforts in Indonesia. In collaboration with the Ministry of Environment and Forestry (KLHK), BNI, and the Borneo Orangutan Survival Foundation (BOSF), BNI is working to ensure the preservation of the Bornean orangutan (Pongo pygmaeus) at the Samboja Lestari Orangutan Rehabilitation Center in Kutai Kartanegara, East Kalimantan. The rehabilitation of critical land and the ongoing care program, which spans five years, is expected to contribute to BNI's commitment to achieving its Net Zero Emission goals.

Textile Waste Processing

As a form of concern for the environment, the Employee Textile Waste Management program or Uniform Disposal Program is designed to handle textile waste, especially employee uniforms that are still suitable for use. This program aims to reduce the pile of textile waste that ends up in the Final Disposal Site (TPA) by implementing the principles of Donate, Recycle, and Upcycle, in accordance with SDG No. 12, namely Consumption & Responsible Production

The Uniform Disposal Program not only focuses on textile waste management, but also provides a social impact on the community. Through this program, 21.6 tons of employee uniform waste were managed and produced three outputs, with the following details:

1. Donate: 5.3 tons of clothing that passed the quality test for reuse were distributed to underprivileged communities in 7 cities in Indonesia, so that the production of 39,984 new textiles was successfully prevented.
2. Recycle: A total of 15.3 tons of textiles that did not pass the quality control test were destroyed and further processed into recycled fabrics, Ja-Brick for home decor, and insulators.
3. Upcycle: A total of 1.12 tons of textiles in a condition of less than 60% eligibility were utilized for further processing into value-added products, such as shoes, etc.

Through this program, BNI supports the creation of a circular economy and provides real benefits for the underprivileged community in Indonesia.

Micro and Small Business Funding and Guidance Program

Micro and Small Business Funding Program

The PUMK program is an initiative within BNI's TJSL activities, designed to improve the quality of life in local communities by fostering the growth of micro and small businesses in partnership with the community. This program is implemented in accordance with the Regulation of the Minister of SOEs No. PER-05/MBU/04/2021, dated April 20, 2021, regarding the Social and Environmental Responsibility Program of State-Owned Enterprises, as well as its subsequent amendment, the Regulation of the Minister of SOEs No. PER-6/MBU/09/2022, dated September 15, 2022. Since its inception in 2017, the BNI PUMK program has been overseen by the Business Program Division.

The implementation of the PUMK program seeks to provide micro and small businesses with easy access to capital, while also offering guidance to strengthen their resilience and promote long-term independence. BNI distributes the PUMK Program through soft loans to current fostered partners, with an administration fee of 3% per effective year of the loan limit. The loans are distributed in the following forms:

1. Loans to finance working capital and/or purchase of fixed assets in order to increase production and sales;
2. Special loans to finance the funding needs for implementing fostered partner business activities which are additional and short-term loans in order to fulfill orders from fostered partner business partners;
3. Development Expenses:
   a. To finance education, training, internships, marketing, promotions, and other matters relating to increasing the productivity of fostered partners as well as for studies/ research related to the Small and Micro Business Funding Program (PUMK);
   b. Development expenses are in the form of grants and the maximum amount is 20% of the Partnership Program funds distributed in the current year;
   c. Development Expenses can only be given to or for the benefit of fostered partners.

Pursuant to the Letter of the Minister of SOEs No. S-721/MBU/11/2022 dated November 10, 2022, there are directives regarding the optimization of PUMK funds, namely the appointment of PT Bank Rakyat Indonesia (Persero) Tbk (BRI) as the manager of the PUMK Program Cooperation. Based on this, a PKS has been signed between BNI and BRI as the manager of the PUMK Program Cooperation, namely PKS No. B.21/MBD/12/2022 and No. SBP/1/018 dated December 13, 2022 with a PKS period of 5 (five) years from 2022 to 2027. In accordance with the direction of the Minister of SOEs, the distribution of PUMK will be focused by BRI as the manager of the PUMK Program Cooperation.

Micro and Small Business Guidance Program

BNI's fostered partners are micro and small business owners who lack technical familiarity with banking due to limited access to loans. These businesses operate across various formal and informal sectors, playing a crucial role in the real economy. It has been proven that the micro and small business segments are more resilient to economic crises. BNI aims to

help these fostered partners enhance their business activities, capital, entrepreneurial mindset, access to banking services, business administration, product quality, and market reach.

BNI consistently provides guidance to its fostered partners, who are micro and small business owners, to help them improve their business governance and achieve better operational standards. By doing so, these partners are expected to become key drivers of economic growth in their local communities.

Based on the Regulation of the Minister of SOEs No. PER-05/MBU/04/2021 dated April 20, 2021 concerning the Social and Environmental Responsibility Program of State-Owned Enterprises, and its amendments, namely the Regulation of the Minister of SOEs No. PER-6/MBU/09/2022 dated September 15, 2022, the fostering fund for fostered partners is part of the TJSL fund distribution program that is being implemented. The distribution of this fostering fund is directed to increase the capacity of fostered partners.

Information on The Financial Report of The Micro and Small Business Funding Program (PUMK)

In accordance with Article 33, Paragraph 2 of the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. Per-1/MBU/03/2023 concerning Special Assignments and the Social and Environmental Responsibility Program, the annual financial report of the UMK Funding Program must undergo an audit by a public accounting firm. For the fiscal year ending December 31, 2024, the audit of the PUMK Program Financial Report was conducted by the Public Accounting Firm Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner and a member firm of the PricewaterhouseCoopers network).

AWARDS FOR SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAM IN 2024

The awards received by BNI throughout 2024 for the implementation of the TJSL program are as follows:

Name of Award	Date	Organized by
Most Impactful Program on Environment	October 24, 2024	Investortrust.id & Bumi Global Karbon Foundation
Integrity & Tranparancy in Impact Award	October 24, 2024	Investortrust.id & Bumi Global Karbon Foundation
SROI Excellent Award	October 24, 2024	Investortrust.id & Bumi Global Karbon Foundation
Top Corporate Donors – Healthcare Category	November 15, 2024	YPP SCTV Indosiar

IMPLEMENTATION OF SROI FOR BNI BERBAGI PROGRAM

To assess the social impact and evaluate the implementation of the BNI BERBAGI Program, BNI has calculated the Social Return on Investment (SROI) for its TJSL Program. In 2024, BNI measured the impact of various programs and projects, including:

1. Borehole in Gunung Kidul (DIY), Score 3.54
2. BUMN House Bekasi (West Java), Score 2.62
3. Waste Management Program in Bogor (West Java), Score 2.20

Special Assignment

As SOE, BNI may receive Special Assignments from the Central Government to carry out public benefit functions as well as national research and innovation, in line with the Regulation of the Minister of SOE of the Republic of Indonesia No. PER-1/MBU/03/2023 dated March 3, 2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises.

BANKING SERVICES (FINANCING, TRANSACTIONS, AND AGENCIES) IN THE COFFEE PLANTATION ECOSYSTEM IN THE PMO KOPI NUSANTARA ECOSYSTEM

Indonesia is one of the world's largest coffee producers, following Brazil, Vietnam, and Colombia. While the country has significant potential to become the leading coffee producer, it faces several challenges, including low productivity, poor processing quality, lack of added value, and underutilization of suitable land.

BNI Jejak Kopi Khatulistiwa is designed to address these challenges, which is a social forestry initiative focused on economic empowerment for local communities through the creation of a green financing ecosystem for coffee farmers and coffee industry stakeholders, establishing a closed-loop financial ecosystem. In forming a close loop financial ecosystem from coffee farming stakeholders, BNI JKK includes 3 processes, namely:

1. Digitalization of on-farm, off-farm and online market processes to realize UMKM Go Digital;
2. On-farm and off-farm coaching so that an environmentally friendly process occurs to realize Go ESG;
3. Grading to connect with the international market to realize UMKM Go Global, an assessment of coffee specifications is carried out including aroma, flavor, after taste, acidity and other characteristics with the following results:
   a. Garut Regency: Final Score 84.25 (Excellent)
   b. Rejang Lebong Regency: Final Score 81.5 (Excellent)
   c. Temanggung Regency: Final Score 84.13 (Excellent)
   d. Jember: Final Score 78.5 (Very Good)

BNI Jejak Kopi Khatulistiwa has been running in 5 locations, namely Garut Regency (West Java Province), Rejang Lebong Regency (Bengkulu Province), Temanggung Regency (Central Java Province), Jember Regency (East Java Province) and Humbang Hasundutan Regency (North Sumatra Province).

Referring to the letter DPS/X/1566/2023 dated May 23, 2023BNI is part of the Nusantara Coffee PMO together with SOE and related stakeholders in the Nusantara coffee commodity. This program is an extension of the Social Forestry Program initiated by BNI since 2017. The Jejak Kopi Khatulistiwa program is considered aligned with environmental aspects, the proper use of forest land, financial inclusion, and through its coffee products and unique flavors, it has the potential to open up opportunities for MSMEs to go global. Through the synergy of this program, BNI aims to increase coffee productivity, which in turn will have a positive impact on the welfare of the stakeholders in Indonesia's coffee ecosystem.

By the end of 2024, the total distribution of People's Business Credit (KUR) in the Jejak Kopi Khatulistiwa program is IDR67.2 billion for 525 farmers. The distribution of Jejak Kopi Khatulistiwa KUR is part of BNI's Social Forestry KUR acquisition. As of December 31, 2024, the total distribution is IDR260.04 billion for 10,467 social forest farmers.

FINANCING FOR MSMES THROUGH LOW-INTEREST LOANS

In collaboration with the Indonesian government, BNI distributes People's Business Credit (KUR) to support the growth of MSMEs. For the 2024 fiscal year, BNI aims to allocate IDR18 trillion for KUR distribution, as outlined in the Letter from the Coordinating Ministry for Economic Affairs of the Republic of Indonesia No. B/KUR/326/D.I.M.EKON/12/2022 dated December 28, 2023.

To optimize the absorption of the National KUR ceiling and ensure the achievement of BNI's KUR distribution targets, it was determined that BNI's KUR distribution target for 2024 would be IDR12 trillion, as confirmed by the Letter from the Coordinating Ministry for Economic Affairs of the Republic of Indonesia No. B/PK.KUR/153/D.I.M.EKON/09/2023 dated September 25, 2023.

The goal of KUR distribution is to assist small entrepreneurs by providing access to capital and fostering business development. By the end of 2024, BNI has provided KUR financing totalling IDR11.91 trillion, achieving 99.3% of the contribution target set by the Indonesian Government.

Distribution of KUR per Type of KUR as of December 31, 2024

Type of KUR	Number of Debtors	Maximum Credit (Rp Billion)	Target (IDR Billion)	Achievements
Supermicro	21	0.2	0.5	40%
Micro	9,707	720.9	740.5	97.4%
Small	43,365	11,165.5	11,220.0	99.5%
PMI	982	26.0	39	66.6%
Total	**54,075**	**11,912.5**	**12,000**	**99.3%**

KUR Distribution Based on Economic Sector as of December 31, 2024

Economic Sector	Number of Debtors	Maximum Credit (IDR Billion)
Manufacturing Industry	3,204	724
Services	9,702	2,151
Trade	32,569	7,322
Fisheries	470	104
Agriculture	8.130	1,612
Total	**54,075**	**11,913**

DISTRIBUTION OF SOCIAL ASSISTANCE

Legal Basis	Year of Commencement	Government Assignment	Compensation	Realization per December 31, 2024
• Law No. 7 of 1992 • Regulation of the Minister of Finance No. 254/PMK.05/2015 • PMK No. 228/PMK.05/2016 • Presidential Regulation No. 63 of 2017 • OJK Circular Letter No. S-15/PP.1/2017 dated June 7, 2017 • Regulation of the Minister of Education No. 10 of 2020 • Decree of the Ministry of Education and Culture No. 20 of 2023	2015	Distribution of Smart Indonesia Program Social Assistance (PIP) by the Ministry of Education, Culture, Research and Technology of the Republic of Indonesia	Disbursement of aid allocation funds sourced from the APBN to the beneficiary's account.	Number of Recipients: 4,029,752 Nominal: IDR6,314,403,600,000
• Addendum III of the Cooperation Agreement between the Ministry of Education and Culture and BNI No. 316/PLPP.3/KU/I/2024 & BNI Number: INS2/001.1/PKS/2024 dated January 19, 2024	2015	School Operational Assistance (BOS)		Number of Recipients: 5,173 Nominal: IDR256,279,838,774
• Addendum to the Cooperation Agreement for the Distribution of Education Cost Assistance for the Smart Indonesia Card (KIP Kuliah) and the PKS Outstanding Scholarship No. 1143/J5/KU.01.02/2022 & BNI Number: HLB-2/017/PKS/2022 dated August 8, 2022	2019	Distribution of Smart Indonesia Card-College Social Assistance (KIP-K) by the Ministry of Education, Culture, Research and Technology of the Republic of Indonesia		Number of Recipients: 324,319 Nominal: IDR2,750,330,458,560
• PKS Banking Services in the context of the Distribution of Various Allowances for Teachers, Other Educators, and Non-Civil Servant Education	2019	Outstanding Scholarships		Number of Recipients: 10,003 Nominal: IDR155,602,142,926

Legal Basis	Year of Commencement	Government Assignment	Compensation	Realization per December 31, 2024
• PKS for the Distribution of Funds for the Micro Credential Non-Degree Competency Development Program No Manual.075/B5/GT.01.15/2024 & BNI No: INS2/022/PKS/2024 dated July 8, 2024 • PKS for the Distribution of Government Assistance Funds for Community Education and Special Education for Fiscal Year 2024 No. 07.25.021/C6-PPK/KU.01.02/2024 & BNI No: INS2/026/PKS/2024 dated July 25, 2024 • PKS for the Distribution of Funds for Emergency Response and Post-Disaster Recovery Assistance for Elementary Schools No. 16087/C3.3/BP2.03/VII/PKS.RKD/2024 & PKS No. INS2/022.1/PKS/2024 and No. INS2/022.2/PKS/2024 dated July 8, 2024	2020	Distribution of Teacher Allowances		Number of Recipients: 391,726 Nominal: IDR2,750,330,458,560
	2023 (distribution until Feb 2024)	Secondary Education Affirmation		Number of Recipients: 2,084 Nominal: IDR52,605,397,869
	2024	Elementary School Government Assistance		Number of Recipients: 249 Nominal: IDR4,900,000,000
	2024	Secondary and Special Education Government Assistance		Number of Recipients: 544 Nominal: IDR20,597,200,000
	2024	Microcredential Assistance		Number of Recipients: 100 Nominal: IDR819,200,000
	2024	Belmawa Assistance		Number of Recipients: 2,491 Nominal: IDR143,496,461,228

PERTASHOP PROGRAM WORKING TEAM PMO PERTASHOP

Based on the Decree of the Minister of SOEs No. 008/PMO-TPIP/VII/2024 dated July 26, 2024, concerning the Assignment of the Pertashop Program Working Team, this program was initiated by Pertamina as a solution to increase fuel accessibility in remote areas in Indonesia. In order to support the acceleration of the implementation and marketing of Pertashop products, the Ministry of SOEs has assigned the Pertashop PMO Program Working Team to BNI.

UMKM ACCELERATION WORKING GROUP

Based on the Decree of the Director General of Strengthening the Competitiveness of Marine and Fishery Products Number 51 of 2024 concerning the Working Group for Acceleration of Empowerment of Micro, Small, and Medium Enterprises (MSME) in the Marine and Fishery Sector, the establishment of the MSME Acceleration Working Group aims to expand access and increase the effectiveness of program credit distribution in the marine and fishery sector.

COFFEE AND COCOA COMMODITY BUSINESS DEVELOPMENT TEAM

Under the Decree of the Minister of State-Owned Enterprises (SOEs) Number SK-272/MBU/11/2024, a Coffee and Cocoa Commodity Business Development Team has been established with a mission is to foster an inclusive and sustainable coffee and cocoa commodity business by facilitating collaboration among various stakeholders in the supply chain. This collaborative effort aims to secure support for implementing advanced technologies to enhance productivity, availability, and quality within the sector.

KPR GRIYA FLPP (SUBSIDIZED MORTGAGE)

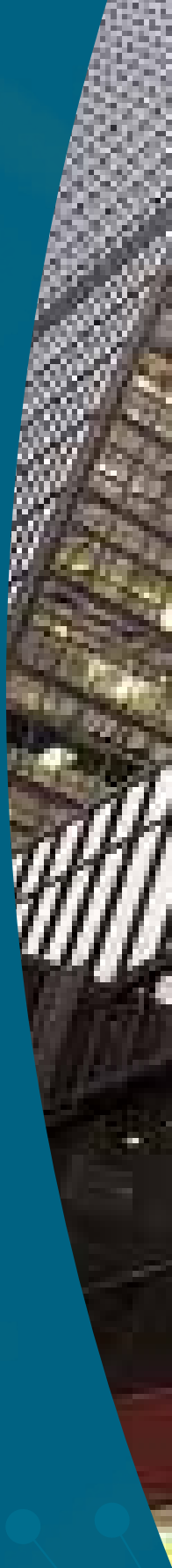
BNI and the Ministry of State for Public Housing formalized a partnership through a Joint Agreement (MoU) No. 02/SKB/DP/2010-DIR/071 and an Operational Work Agreement (PKO) No. 27/SM.6/HK.02.04/10/2010-DIR/072, signed on October 25, 2010. This collaboration pertains to the distribution of Housing Financing Liquidity Facility (FLPP) funds. Under this agreement, BNI is entrusted with providing housing credit facilities to Low-Income Communities (MBR), facilitated through the Government-supported Housing Financing Liquidity Facility (FLPP) program, known as KPR BNI Griya FLPP.

KPR BNI Griya FLPP is a manifestation of BNI's commitment to supporting government programs in the field of providing housing needs for low-income communities (MBR). Until the end of 2024, BNI has realized the distribution of the KPR BNI Griya FLPP budget of IDR12,127 billion. The strategies carried out to support the expansion of KPR Griya FLPP until the end of 2024 include:

1. BNI provides appreciation/rewards to subsidized developers;
2. In encouraging the absorption of BNI Griya FLPP, BNI collaborates with the Developer Association, subsidized developers, and conducts socialization to the regions by involving external and internal stakeholders.

09
ESG Commitment

BNI 2024 Environment, Social, and Governance (ESG) Performance Highlights	1172
BNI 2024 ESG Development Expectation Setting Meeting (ESM)	1173
ESG Implementation Commitment	1176
BNI ESG Risk Management	1178
Persons Responsible for ESG Implementation at BNI	1182
BNI's ESG Implementation Supervision and Evaluation	1184
Implementation of Sustainable Finance In Subsidiary Companies	1185
ESG Index: BNI Sustainability Practice Summary	1192




印尼國家銀行
BNI

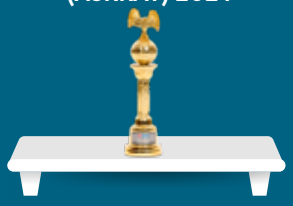
BNI Environmental, Social, and Governance (ESG) Performance Highlights 2024

RATING ESG

MSCI	Sustainalytics	Sri Kehati	ESG Sectors Leaders IDX Kehati	Quality 45 IDX Kehati
(BBB)	(23.2 (Medium Risk))	December 2024-May 2025 Period	December 2024-May 2025 Period	December 2024-May 2025 Period

AWARDS

Asia Sustainability Report Rating (ASRRAT) 2024



Gold Rank Predicate

Anugerah ESG Republika 2024



Sustainability Reporting

ESG Appreciation Night B Universe 2024



Most Appreciated ESG Report

ESG Appreciation Night B Universe 2024



ESG Lowest Risk

Investor Daily ESG Appreciation Night 2024



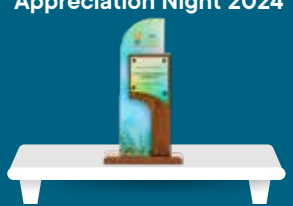
Appreciated Circular Economy ESG Report

Investor Daily ESG Appreciation Night 2024



Appreciated Diversity Inclusivity ESG Report

Investor Daily ESG Appreciation Night 2024



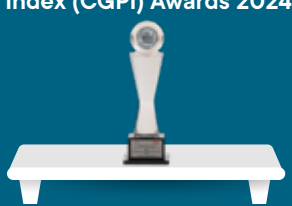
Most Appreciated ESG Report

KATADATA ESG Awards 2024



Finance Sector: Social Champion

Corporate Governance Perception Index (CGPI) Awards 2024



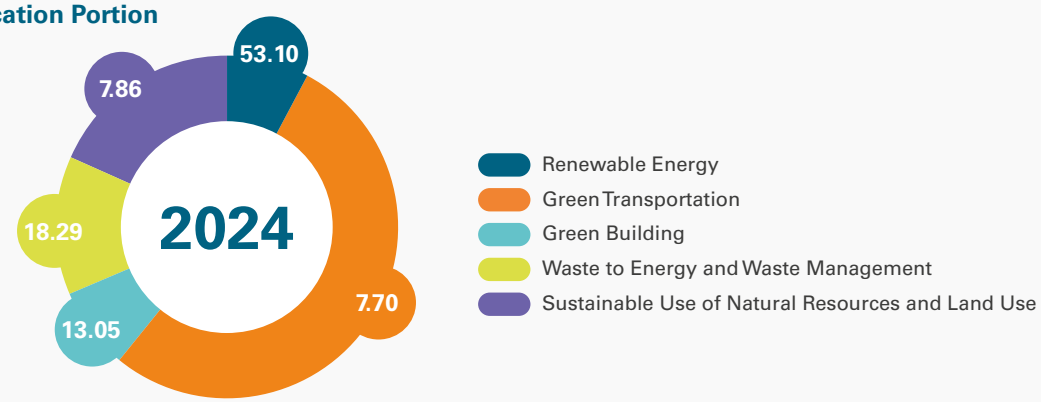
The Most Trusted Company

Development of BNI LST Implementation 2024

ENVIRONMENTAL ASPECT

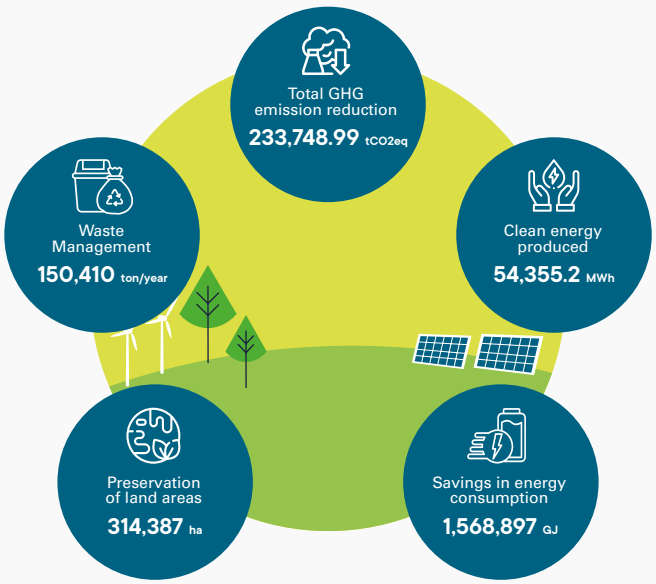
a. **Financing:**
   1. BNI's green financing (KUBL) distribution reached IDR73.4 trillion, accounting for 9.6% of the Bank's total credit (bank-only basis), marking a year-on-year growth of 8.12%.
   2. Sustainability Linked Loan (SLL) distribution of IDR6.0 trillion
   3. BNI has utilized 87.26% of the proceeds from its Environmentally Conscious Bonds issued in 2022. The funds were allocated to green projects that meet the eligibility criteria for financing and have been validated by an Environmental Expert through a Second Party Opinion (SPO). This opinion confirms the positive environmental contributions of these projects. The allocation details for these green bonds are as follows.

Allocation Portion
(%)



The remaining 12.74% of the green bond distribution is allocated to other KUBL in accordance with POJK 60/2017.

The positive environmental impacts of the use of green bond funds by debtors are as follows:



Further details on the projects financed through BNI Green Bonds and their reported environmental impacts are available in the BNI Green Bond Report 2024. This report can be accessed on the BNI website under the Environment, Social, and Governance (ESG) section: https://www.bni.co.id/en-us/company/bni-esg.

4. Determination of the NZE Financing Roadmap for 2060
5. Implementing financing emission calculations using the PCAF methodology for corporate, enterprise, commercial and retail productive segment credit portfolios
6. Implementation of the Indonesian Sustainable FinanceTaxonomy (TKBI) for the energy sector
7. Education in the implementation of TKBI through the BNI ESG Sustainability & Transition (BEST) Event forum and TKBI Technical Workshop for debtors in the energy sector
8. Calculation of the Climate Risk Stress Test (CRST) covering 50% of BNI's portfolio
9. Strengthened the Risk Acceptance Criteria (RAC) for 22 (twenty-two) industrial sectors for the Corporate and Enterprise segments, 18 (eighteen) industrial sectors for the Commercial segment and 10 (ten) industrial sectors for the Retail Productive segment with ESG Aspects
10. Supporting Energy Transition and Environmentally Friendly Transportation Projects
    a. Financing of power plants with renewable energy sources, Sidrap Wind Power Plant (PLTB) in South Sulawesi with a capacity of 75 Megawatt peak (MWp) worth IDR1.6 trillion
    b. Financing of Solar Power Plant (PLTS) with a capacity of 25 MWp in Bali Province with a project value of IDR375 billion and a financing value of IDR260 billion
    c. Financing of the Integrated Rail Transit (LRT) mass transportation mode of Jakarta-Bogor-Depok-Bekasi with a passenger transport capacity of up to 500 thousand passengers per day amounting to IDR1.2 trillion

b. Operational:

1. Determination of the 2028 Operational NZE Roadmap
2. Development of Emission Data Management Infrastructure
3. Calculation of carbon emissions including Scope 1, Scope 2, and Scope 3 (Operational and Financing Emissions)
4. Two of BNI's Head Office buildings have achieved Building certification, namely Menara Pejompongan BNI with Gold Certification and Plaza BNI with Platinum Certification
5. Installation of solar panels with a capacity of 2,200 watts for lighting on the emergency stairs of Plaza BNI, BSD
6. Electricity efficiency by reducing the use of lights in Grha BNI, Plaza BNI, Gedoeng BNI, and Menara BNI
7. BNI has become the first bank in Indonesia to adopt the Partnership Investor Own Investor Operate (IO2) cooperation scheme for Public Electric Vehicle Charging Stations (SPKLU) in collaboration with PLN.
8. Development of BNI Waste Management with the Zero Waste to Landfill Concept.

c. Supply Chain

Committed to environmental sustainability and responsible business practices, BNI evaluates Vendors/Suppliers to ensure that they are committed to prioritizing environmental considerations. This includes assessing their compliance with environmental regulations, proximity to protected areas, and greenhouse gas and waste management practices.

SOCIAL ASPECT

a. Human Resources (HR):

1. Employee Engagement Score reaches 96%
2. Employee Satisfaction Level reaches 92%
3. Preparation and Approval of Respectful Workplace Policy

b. Access to Finance:

1. BNI has 213,370 BNI Agen46
2. Ayo Menabung dengan Sampah Program
3. MSME empowerment program through the BNI UMKM Ramah Lingkungan (BUMI) program, Jejak Kopi Khatulistiwa (JKK), Millennial Smartfarming, Fishery Cultivation Village, and others

c. Privacy & Data Security

1. BNI has a CISO Division tasked with safeguarding information and improving cyber security
2. Implementation of Data Loss Prevention (DLP) mechanisms
3. Implementation of Threat Hunting
4. Adopting international security frameworks and standards such as ISO 27001 and the National Institute of Standards andTechnology (NIST)

5. BNI has a Digital Risk Framework adopted from the best practice framework
6. In connection with the enactment of Law of the Republic of Indonesia No. 27 of 2022 concerning Personal Data Protection (PDP), BNI is preparing procedures, assessments and mitigation/prevention related to, management of infrastructure, applications and IT systems as well as implementing security implementations.
7. Implementation of the masking process for sensitive data
8. Implementing the Incident Handling Maturity Level Measurement (TMPI) which is a tool to map the level of organizational readiness in handling and recovering cybersecurity incidents, including in detecting and responding if there is an incident of personal data leakage due to system security gaps
9. Conducting a Cyber Security Maturity (CSM) assessment, which is an instrument from BSSN to assess the level of cybersecurity maturity of an organization, including the assessment of the maturity of the management and protection of personal data confidentiality (data privacy).
10. Implementing a third-party risk assessment, including conducting a vendor security assessment in the aspects of Technology, Information and Cyber.
11. BNI requires a Non-Disclosure Agreement (NDA) for third parties if there is cooperation that uses customer data, and only sends customer data according to customer approval.
12. BNI subsidiaries report on issues and discussion topics for data management, including data privacy and security as a data harmonization process in Subsidiaries.
13. Implementing periodic security awareness to educate employees and customers about the importance of maintaining the confidentiality and security of personal data.

d. Consumer Financial Protection

1. Customer satisfaction score or Customer Satisfaction Survey (CSS) in 2024: 4.28 (scale 1 to 5)
2. Percentage of customer complaint resolution in 2024: 99.99%
3. Providing training on consumer financial protection

e. Supply Chain

As part of its commitment to social responsibility and responsible business practices, BNI ensures that its vendors/suppliers adhere to social considerations. This is achieved by evaluating prospective suppliers using social criteria, which include ensuring the absence of child labor, forced labor, discriminatory practices related to ethnicity, religion, race, or intergroup relations, as well as promoting equality in employee promotion and remuneration.

GOVERNANCE ASPECT

1. BNI has an ESG Subcommittee under the Risk Management & Anti-Fraud Committee
2. BNI has a special work unit, namely the Environment, Social & Governance (ESG) Management Department under the Enterprise Risk Management (ERM) Division
3. BNI ESG Policy:
   a. BNI ESG Framework and Roadmap
   b. Determination of the Net Zero Emission Roadmap
   c. Green Loan Incentive Provisions
   d. Emission Data Technical Instructions
   e. Environmentally Friendly Business Activity Technical Instructions (KUBL)
   f. Sustainability Linked Loan (SLL) SOP
   g. Solid Waste Management SOP
4. The Board of Directors has KPIs for ESG performance that are passed down to Work Units (Green Loan and ESG Rating)

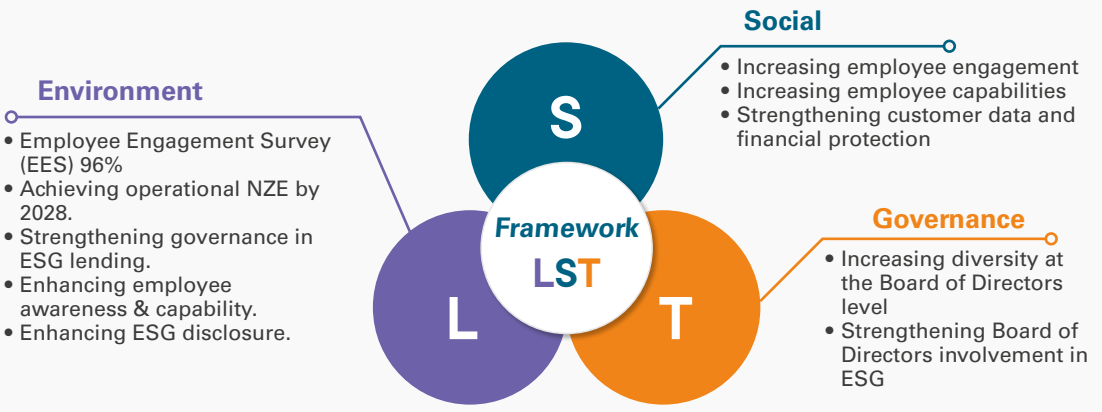
Commitment to Implementing ESG

ELEVATING IMPACT, EMPOWERING SUSTAINABILITY

BNI prioritizes the implementation of sustainability principles encompassing Environment, Social, and Governance (ESG) aspects across all areas of its business. BNI is also deeply committed to supporting the achievement of the Sustainable Development Goals (SDGs) which have become a global issue and a key focus of the Indonesian Government.

BNI believes that sustainability should generate a positive impact for all stakeholders, creating a lasting legacy that benefits future generations. As a business entity predominantly owned by the state, BNI is dedicated to advancing as a leading agent of transformation in the implementation of ESG principles.

BNI LST FRAMEWORK & BNI LST ROADMAP



SHORT-TERM FOCUS	MEDIUM-TERM FOCUS	LONG-TERM FOCUS
• Strengthening Infrastructure • Establishing NZE and Carbon Budget	• Strengthening debtor Risk Acceptance Criteria (RAC) • Strengthening Climate Change Risk Management Infrastructure • Strengthening Board Engagement on ESG • Optimizing Data Loss Prevention	• Implementation of climate change risk management in bank operations

BNI NET ZERO EMISSION (NZE) TARGET

BNI is committed to achieving Net Zero Emission (NZE) Operations by 2028 and NZE Financing by 2060. The strategies implemented to achieve these targets are as follows:

1. Sustainable product development, such as:
   a. Launching Sustainability Linked Loans to encourage debtors to implement ESG and have a transition map towards green.

b. Distribution of green bonds for green projects currently being carried out in 5 sectors, namely Renewable Energy, Environmentally Friendly Transportation, Environmentally Friendly Buildings, Waste Management into Energy and Waste Management, and Sustainable Use of Natural Resources and Land Use.
c. Development of financing schemes to support and develop environmentally oriented MSME ecosystems, such as the Equator Coffee Trail - Social Forestry and the BNI Environmentally Friendly MSME (BUMI) program.
d. Financing in the energy transition sector to encourage the transition to clean energy.
e. Evaluating the possibility of issuing other sustainability-oriented bonds.
f. Collaborating with strategic partners to issue sustainability products for individuals, such as issuing environmentally friendly credit cards in collaboration with WWF and issuing credit cards with recyclable raw materials in collaboration with AMEX.
g. Optimizing the savings program with waste to increase student awareness in managing plastic waste.

2. Energy efficiency
   a. Use of energy-saving technology.
   b. Arrangement and optimization of the use of AC and lights in office buildings.
   c. Use of renewable energy in the BNI Plaza Building.
   d. Having a green building certified building: BNI Plaza Building and BNI Tower.
   e. Developing a waste management program to increase avoided emissions.
   f. Optimizing online media for meetings.

3. Implementation of Net Zero Emission in Subsidiaries
   BNI recognizes that the achievement of Net Zero Emissions must be implemented across the entire business group. To this end, in 2024, BNI will align its Net Zero Emission efforts with those of its subsidiaries. This initiative began by mandating subsidiaries to conduct emission inventories and calculate Scope 1 and 2 emissions. These steps are also in preparation for the upcoming implementation of IFRS S1 & S2 in Indonesia.
4. Increasing Engagement and Awareness with Debtors and Customers for the Green Transition
   The BNI ESG Sustainability & Transition (BEST) Event was held on September 24, 2024, to deepen BNI's understanding, constructive discussions, and establish collaborations that will accelerate the transition process towards a green and sustainable economy between BNI and stakeholders.

   On December 11, 2024, BNI hosted TKBI Technical Assistance Workshop, aimed at supporting debtor PICs in completing the TKBI questionnaire.

   The workshop served as a refresher on the TKBI framework, with the goal of enhancing debtor PICs' understanding of its concepts and objectives. It also provided technical guidance on accurately filling out the TKBI questionnaire and offered an interactive forum for discussions, questions, answers, and the resolution of any technical challenges encountered by debtor PICs.

5. Waste management
   In its waste management practices, BNI adopts the Zero-Waste to Landfill (ZWTL) concept, utilizing the 3R method (Reduce, Reuse, & Recycle). This approach reflects BNI's commitment to reducing operational emissions and optimizing its recycling program for waste generated by BNI buildings. Additionally, it aims to minimize and eventually eliminate direct waste disposal to the Final Disposal Site (TPA). Currently, waste management practices have been implemented at five BNI head office locations: Grha BNI, Menara BNI Pejompongan, Gedoeng BNI Kota, Plaza BNI BSD and DC Slipi.

BNI ESG Risk Management

MANAGEMENT PIPELINE WITH ESG CONSIDERATION

In addressing environmental and climate change risks, BNI follows the Financial Services Authority (OJK) policy, considering the industry's risk appetite and acceptance in alignment with ESG issues.

For BNI, ESG-related concerns include deforestation, flooding, biodiversity loss, environmental pollution, and drought. Although these issues may not directly impact BNI, the financial risk analysis is linked to financing provided to debtors exposed to similar risks.

As a result, BNI exercises caution in financing business sectors that have the potential to harm the environment or contribute to global warming and climate change.

BNI has implemented a credit policy with ESG insight, as well as mapping banking activities as an effort to mitigate and adapt to climate change.This process is consistently carried out by Corporate Banking Divisions 1, 2, 3 and 4, International Division, Enterprise Banking Division, Commercial Banking Division 1 and 2, Institutional Banking Division 1 & 2, Syndication & Structured Finance Division, Retail Productive Banking Division, Small Business & Program Division, Corporate & Enterprise Credit Risk Division, and Commercial Credit Risk Division.

BNI's Risk Management Flow can be explained through the following chart:

Pipeline Management Flow

1 Lead Generations (Market Insight)

Search for prospects through:

- Transaction Data
- *Referral*
- Coldprospect
- Personal Contacts
- Priority sector industry associations

2 Pre-Screening (Solicit, Prospect & Pre Screening)

Pre-screening & character checks

Reduce unqualified leads from the start

Pay attention to Climate Risk per regional:

- Recognize the potential for disaster
- Priority for increasing portfolios outside potential disaster areas (geographical, geological, hydrological and demographic)

3 Risk Acceptance Criteria (RAC)

RAC per Industrial Sector included in "Appetite"

Stricter RAC per Industrial Sector included in "Limited/No Appetite"

RAC that takes into account Environmental, Social & Governance aspects

4 Business Acceptance Committee

5 Pipeline Monitoring

Example: Risk Acceptance Criteria

ASPECT	MINING	PALM OIL
Environment, Social & Governance	• Minimum Proper BLUE • No bad news about environmental violations locally & internationally	• RSPO/ISPO certified • No social/ environmental disturbances in the last 5 years • Nature & local habitat conservation

PIPELINE MANAGEMENT MECHANISM THAT CONSIDERS LST ASPECTS

1. In identifying industrial sectors to enhance its portfolio, BNI conducts a review involving discussions between business units, risk units, and risk management. BNI utilizes the Industry Risk Appetite (IRA) to assess sectors, considering factors such as the Industry Risk Rating (IRR), the prospects of leading industries or regional advantages, and business considerations, along with the project pipeline.

   The initial screening process focuses on identifying potential prospects that meet BNI's sustainability criteria, such as climate risks and the likelihood of natural disasters in specific regions. Additionally, this process ensures that businesses are not involved in activities prohibited by the government, including violations of local community rights, forced labor, child exploitation, human rights abuses, and other regulatory breaches.

   Moreover, BNI aims to select businesses operating in sectors that have embraced sustainable financial principles or have prioritized ESG factors in their operations, even though this implementation is still a work in progress and being gradually improved. Based on these factors, BNI classifies industrial sectors into three categories: Appetite, Limited Appetite, and No Appetite.

2. In an effort to support pipeline management, BNI has strengthened the Risk Acceptance Criteria (RAC) to 22 (twenty-two) industrial sectors for the corporate segment, 18 (eighteen) industrial sectors for the commercial segment and 10 (ten) industrial sectors for the retail productive segment.

   22 (twenty two) industrial sectors for the corporate segment, including:

   List of RAC Corporate Segment
   1. Palm Oil Plantation
   2. Palm Oil Processing Industry
   3. Metal Ore Mining
   4. Smelter Refiner
   5. Metal and Metal Ore Trading
   6. Metal Goods Industry (Fabricator)
   7. Civil and Building Construction
   8. Toll Road Construction
   9. Electricity
   10. Recurring Real Estate
   11. Non-Recurring Real Estate
   12. Telecommunications
   13. Operators and Data Centers
   14. Chemical Industry
   15. Cement Industry
   16. Fast Moving Consumer Goods (FMCG)
   17. Hospitals
   18. Pharmaceutical Industry
   19. Distributor Trading
   20. Retail Trading
   21. Coal Mining
   22. Mining Contractor Services

   The 18 (eighteen) industrial sectors for the commercial segment, including:
   1. Trade Sector
   2. Manufacturing Sector/Processing Industry/ Factory
   3. Services Sector
   4. Domestic Wholesale/Distributor Fast Moving Consumer Goods (FMCG) Sector
   5. Export Trade Sector
   6. Retail Trade Sector (Fast Moving Consumer Goods (FMCG) Sector including network ownership)
   7. Fuel Oil Distributor Trade Sector
   8. Four-Wheeled Vehicle/Two-Wheeled Vehicle Dealer Trade Sector
   9. Food & Beverage Processing Industry Sector
   10. Chemical, Rubber, and Plastic Industry Processing Sector
   11. Palm Oil Processing/Factory (PKS) and/or Kernel Oil Factory (PKO) Sector
   12. Palm Oil Plantation Sector (Upstream)
   13. Public Transportation Sector
   14. Construction Sector
   15. Provision Sector Accommodation for lodging, hotels and the like
   16. Recurring Real Estate Rental Sector (Tenant Mall, warehouse complexes, and the like)
   17. Rental Service Sector for Transportation Equipment, Machinery, Heavy Equipment and the like
   18. Health Service Sector and Hospital Social Activities

   Then, 10 (ten) industrial sectors for the retail productive segment, including:
   1. Generic (subsector that does not yet have/ does not have a specific RAC);
   2. Domestic Wholesale Trade (wholesale);
   3. Retail Trade (retail);
   4. Processing Industry;
   5. Palm Oil Plantations;

6. Chemical Industry;
7. Export Import Trade;
8. Public Transportation;
9. Construction;
10. Accommodation Providers.

As an improvement in the implementation of BNI's Environment, Social, & Governance (ESG), especially in the Financing Environmental Impact aspect, the development of the application of risk assessments for all sectors is carried out, considering the Environmental Social Governance (ESG) factor as one of the factors of the Risk Acceptance Criteria (RAC) per sector with an emphasis adjusted based on the characteristics of each industrial sector.

3. The BNI Compliance Division will conduct a Credit Compliance Review (C2R) before granting credit to ensure that the credit process is in accordance with all applicable provisions, including the ESG aspects set by BNI.

4. The credit committee will analyze the debtor/potential debtor, including all risks and risk mitigation, before deciding to approve or reject credit, including issues related to LST. The Credit Committee is structured in a hierarchical manner according to the authority to make decisions, up to the Board of Directors.

5. Pipeline Monitoring:
   a. Periodically, the Business Unit will monitor through a watchlist system and assess the debtor's rating. If violations of the LST aspects are found, BNI will verify with the relevant parties and can adjust the debtor's rating if it is proven that the debtor does not meet the established LST aspects;
   b. Internal Audit will periodically audit debtors whose operational activities can have a negative impact on the environment.
   BNI is still working to make sure that the credit is used to help environmentally conscious, ethical, and productive enterprises. The Business Unit regularly evaluates the debtor's rating and keeps an eye on things using a watchlist system. Every three months, the Corporate & Enterprise Credit Risk (CER) Division and the Commercial Credit Risk (CMR) Division will receive reports on the watchlist system's outcomes. As part of the monitoring procedure, each accountable unit must also evaluate samples of debtors.

If a violation of environmental, social, and governance (ESG) aspects is detected, BNI will verify with the relevant parties and potentially reduce the level (downgrading) if it is proven that the debtor does not comply with ESG regulations.

In 2024, the Bank will map the fulfillment of ESG aspects in portfolios that have a high impact on the environment to support the implementation of ESG, including:

- The number of debtors that have RSPO/ISPO certificates is 49 companies, while 9 other companies are in the process of obtaining RSPO/ISPO certificates.
- For debtors engaged in the Cement Industry, they have received the BLUE and GOLD Rating Assessment Program (PROPER).
- Debtors in the mining industry (Mine Operators) have partly received the BLUE, GREEN and GOLD Rating Assessment Program (PROPER).
- In this case, BNI continues to encourage debtors in the palm oil sector to obtain ISPO and RSPO certification, and to fulfill certification according to their respective industrial sectors.

IMPROVEMENTS IN ESG RISK MANAGEMENT

By improving ESG-related policies, creating ESG-related tools and advice, and establishing Net Zero Emission (NZE) goals for operations and financing, BNI will continue to enhance and improve Risk Management in ESG aspects in 2024.

1. Policy Strengthening
   a. In line with BNI's commitment to implementing ESG, BNI has developed an ESG policy with the aim of improving ESG policies which include the preparation of an ESG framework and re-sharpening of policies related to the environment, social, and governance as well as setting a short, medium, and long-term roadmap for BNI towards Net Zero Emission.
   b. Set an operational NZE target in 2028 and a financing NZE target in 2060.

2. BNI strengthens ESG-related tools and guidance, including:
   a. Building an emission data infrastructure to obtain operational emission data from BNI Regional Offices and Branches so that periodic monitoring of emission developments can be carried out.
   b. BNI has identified high-emission sectors in the Corporate and Medium segment credit portfolios. For these high-emission sectors, BNI regulates the portfolio through the Loan Exposure Limit (LEL) in each industry.
   c. Strengthening the Risk Acceptance Criteria to 22 sectors for the corporate segment, 18 sectors for the commercial segment and 10 sectors for the retail productive segment in 2024.
   d. Carrying out BNI financing emission calculations using the PCAF (Partnership for Carbon Accounting Financials) methodology for the corporate, enterprise, commercial and retail productive segment credit portfolios.
   e. Building the Climate Risk Stress Test (CRST) tools which aim to analyze and evaluate the impact of climate change on the financial performance and health level of financial institutions using the Network for Greening the Financial System (NGFS) scenario simulation in accordance with OJK's direction.
3. BNI has calculated and reported the Climate Risk Stress Test (CRST) in 2024 using the NGFS scenario which includes Net Zero 2050 (Orderly), Delayed Transition (Disorderly), and Current Policies (Hot House World). The CRST calculation covers 50% of BNI's portfolio consisting of 6 (six) productive sectors and property ownership credit with the following details:
   1. Agriculture, Forestry, and Fisheries
   2. Mining and Quarrying
   3. Procurement of Electricity, Gas, Steam/Hot Water and Cold Air
   4. Construction
   5. Transportation and Warehousing
   6. Processing industry (primarily in the metal, paper, chemical and textile industries)

   Additionally, BNI's whole portfolio will be included in the Climate Risk Stress Test (CRST) computation by 2025. BNI is improving the data required for the computation and creating the CRST tool in order to get ready for this.

Person in Charge of LST Implementation at BNI

The Environment, Social, and Governance (ESG) Subcommittee was established by the Board of Directors as the body in charge of implementing LST elements through the Decree of the Board of Directors No. KP/745/DIR/R on October 26, 2023. The ESG Subcommittee falls under the Risk Management & Anti-Fraud Committee of the Board of Directors.

The membership composition of the ESG Subcommittee is as follows:

Chairman	Deputy President Director
Vice Chairman	Risk Management Director
Secretary	Enterprise Risk Management Division Head (concurrently as permanent non-voting member)
Permanent Members at the Director Level and SEVP (Voting Member)	1. Finance Director 2. Wholesale & International Banking Director 3. Enterprise & Commercial Banking Director 4. Retail Banking Director 5. Network & Services Director 6. Technology & Operations Director 7. SEVP Treasury
Permanent Members at the Director Level (Non-Voting Member)	Human Capital & Compliance Director*
Permanent Members at the Division/Unit Level (Non-Voting Member)	1. Corporate Secretary Division Head 2. Policy Governance Division Head 3. Investor Relations Division Head 4. Corporate Planning & Performance Management Division Head 5. International Banking & Financial Institutional Division Head 6. Subsidiaries Management Division Head 7. Procurement & Fixed Assets Division Head 8. Treasury Division Head 9. Compliance Division Head 10. BNI University Division Head 11. Human Capital Strategy Division Head 12. Human Capital Services Division Head 13. Corporate Banking 1 Division Head 14. Corporate Banking 2 Division Head 15. Corporate Banking 3 Division Head 16. Corporate Banking 4 Division Head 17. Syndication & Structured Finance Division Head 18. Enterprise Banking Division Head 19. Commercial Banking 1 Division Head 20. Commercial Banking 2 Division Head 21. Operational Risk Management Division Head 22. Corporate & Enterprise Credit Risk Division Head 23. Commercial Credit Risk Division Head 24. Consumer Product Division Head 25. Retail Productive Banking Division Head 26. Business Program Division Head 27. Card Business Division Head 28. Agen46 Division Head
Non-permanent Members (Non-Voting Member)	Director/SEVP/Division/Unit Head related to the discussion topic

*) Specifically, Human Capital & Compliance Director has special duties and responsibilities as regulated in the Committee Work Guidelines

The ESG Subcommittee has the following duties and responsibilities:

1. Prepare Environmental, Social & Governance management policies and strategies and their changes;
2. Identify potential LST risks that have an impact on both BNI and BNI stakeholders;
3. Monitor the implementation of sustainable financial strategies;
4. Monitor, evaluate, and provide recommendations on the results of BNI's LST assessment; and
5. Evaluate the implementation of LST strategies in all BNI business lines.

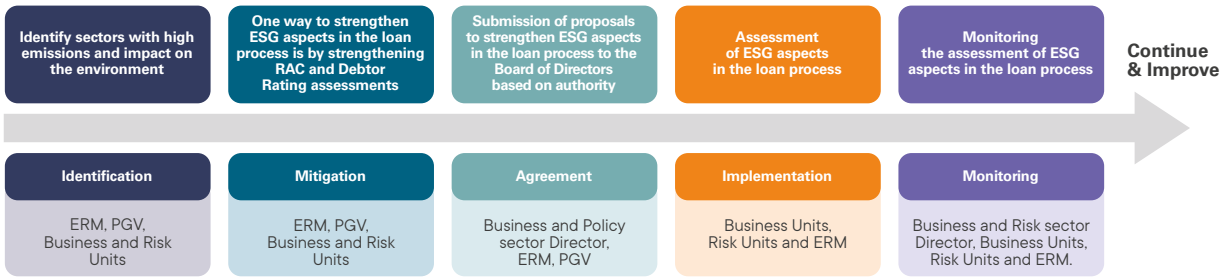
Under the direction of the Board of Commissioners and Directors, all work units are responsible for implementing sustainability management elements. BNI has a unique work unit called the Environment Social & Governance Management Department (ESM) that oversees the implementation of sustainable finance and ensures the implementation of sustainability governance. The Enterprise Risk Management (ERM) Division includes the Environment Social & Governance Management Department (ESM).

The main tasks of the Environment Social & Governance Management Department (ESM) are:

1. Prepare, develop, manage and review the framework, roadmap and ESG strategy, Net Zero Emission and Climate Risk bankwide.
2. Prepare, develop and review the Sustainable Financing and Bond Framework with related divisions.
3. Prepare, develop, manage and review ESG programs.
4. Prepare and manage the Sustainable Finance Action Plan, Corporate Plan related to ESG, Sustainability Report, sustainability-oriented bonds, sustainable financing, in accordance with applicable regulatory provisions and/or best practices.
5. Develop and manage ESG information systems and emission calculation methodologies and climate risk stress tests in accordance with applicable regulatory provisions and/or best practices.
6. Coordinate the implementation of ESG principles & Climate Change Risk across all Bank business lines, including Subsidiaries and KLN.
7. Prepare, organize, conduct reviews related to planning, execution and performance of communication, socialization and campaigns related to ESG programs both internally and externally.
8. Perform the function of Working Group Coordinator for the ESG Sub Committee and liaison with external parties in the field of ESG policy.
9. Monitor exposure and report to regulators/other external parties related to ESG (Green portfolio, Green Bond and other ESG-oriented bonds, Indonesian Green Taxonomy (THI), Sustainability Report (sustainable governance, sustainable management, sustainable financing and carbon emission data) etc.

Supervision and Evaluation of BNI's LST Implementation

LST risk management in BNI's environment can be seen in the following image:



Top management consisting of the Board of Directors and Board of Commissioners of BNI plays a role in providing supervision over efforts to implement good governance principles together with all work units to ensure responsible business practices, and encourage the principle of prudence in managing risks. The Bank continues to maintain the highest standards of ethical behavior in operations and reporting that is accountable, accurate, and transparent, and maintains compliance with applicable laws and regulations.

The governance structure, policies, and operational processes implemented are directed to help identify and manage environmental, social, and governance (LST) risks throughout BNI's value chain.

Implementation of Sustainable Finance in Subsidiaries

The implementation of sustainable finance in BNI's subsidiaries has been carried out by compiling and submitting the Sustainable Finance Action Plan (RAKB) document to the OJK.

IMPLEMENTATION OF SUSTAINABLE FINANCE IN SUBSIDIARIES

PT BNI Multifinance

1. Development of battery-powered electric motor vehicle financing;

Booking Realization

Type of Electric Vehicle	2023	2024
	Unit	Unit
Electric Vehicle (EV)	204	469
Hybrid	413	768
Total	**617**	**1.237**

2. Development of internal company capacity in the introduction/socialization of RAKB;
   Training and socialization conducted include:
   - Socialization of SKMI (Information Management Security System) ISO 270001:2022
   - Socialization of APPU PPT and Supervision
   - Socialization of Information Classification & IT Disaster Recovery Procedures
   - Training and Socialization of the Personal Data Protection Law
   - Training for Newbie Credit Marketing Officers (CMO) and Field Collectors (FC)
   - Training for Newbie New Employees
   - Training Collection and Risk Management
   - Training for Corporate & Fleet Financing Analysis
   - Workshop on Understanding the Corruption Law and Deepening the Anti-Bribery Management System (SMAP)
   - OJK Workshop on Sustainable Finance Training Activities
   - Training for Corporate Secretary & Corporate Planning
   - National Seminar on Economic Outlook 2025
   - Socialization of the Use of the Human Capital Management System (HCMS) Website
   - Training for Credit Analyst (CA) Review
   - Training for Era Company Tax Reporting Management Coretax
   - Consumer Protection Training Workshop
   - Anti-Fraud Seminar
   - Basic Managerial Certification
   - Audit Certification – Certified Internal Audit Professional (CIAP)
   - Risk Management Certification
   - Collection Profession Certification
   - General Manager Certification of Human Resources (HR) Professional Certification Institute (LSP) Analytical Human Resources Management (MSDM)
   - Training Supervisory Development Program
3. Social activities to the neighbourhood and community;
   PT BNI Multifinance continuously carries out social activities including providing assistance to orphans and the poor in the Karet Kuningan area where the PT BNI Multifinance head office is domiciled. In addition, every year the company donates sacrificial animals.
4. Organizational Adjustment and Risk Management
5. Preparation of sustainable financial guidelines by considering social and environmental aspects.

PT BNI Sekuritas

BNI Sekuritas' Sustainable Finance Plan is prepared with 3 main focuses including the development of sustainable financial products or services, capacity development related to awareness of sustainable finance internally, and integration of ESG aspects through organizational adjustments, risk management, governance, and standard operating procedures.

BNI Sekuritas has realized a number of sustainable finance activity plans planned for 2024, including:

1. Identification of business products or financial services based on ESG-based KKB
   BNI Sekuritas has identified business products and financial services based on KKB and ESG together with all its business departments. This is a strategic step to increase BNI Sekuritas' contribution to sustainable economic development in Indonesia.

2. Becoming an underwriter for investment products based on KKB and LST
   Through the Investment Banking business, BNI Sekuritas will become an underwriter for a number of investment products based on KKB and LST during 2024.

3. Sustainable Finance Workshop for all BNI Sekuritas employees
   BNI Sekuritas in collaboration with The Indonesia Capital Market Institute ("TICMI") held a workshop themed "Promoting Sustainable Investment in Indonesia Capital Market: One Step Towards More Sustainable Investments."

4. Integration of KKB and LST risks in the risk management policy review process
   In accordance with the plan that was prepared in the previous year, BNI Sekuritas accommodates aspects of KKB LST in the process of preparing the Risk Management Policy.

5. Recording of BNI Sekuritas' energy use and carbon emissions
   In order to achieve Operational NZE in 2028, BNI Sekuritas has started recording energy consumption and business travel.

6. Implementation of the Social and Environmental Responsibility (TJSL) or CSR program
   BNI Sekuritas also developed the CSR program "We Move, We Share, We Care" which is based on Sustainable Financial Activities by considering the Environmental, Social, and Governance aspects. The program developed focuses on financial literacy and inclusion activities, environmental sustainability, and sustainable community empowerment.
   In 2024, the Company will integrate ESG aspects more comprehensively through collaboration with several partners from non-government organizations ("NGOs") including:
   a. Planting mangrove seedlings in the Cilacap area in collaboration with Fairatmos
   b. Collaborating with River CleanUp by providing donations in the form of cleaning equipment for the Cikapundung River area, Bandung
   c. Empowering the disabled community with Cemara Paper in Bandung City by recycling paper waste into outsourced goods in the form of notebooks

7. Achieving the Corporate Governance Perception Index ("CGPI") and ISO Standardization
   BNI Sekuritas has also improved governance with ISO standards including ISO 37001:2016 Anti Bribery Management System, ISO 27001:2013 Information Security Management System, and ISO 22301:2019 Business Continuity Management System. The achievement of strengthening governance is also reflected in the achievement of the Trusted Company award at the 2023 CGPI event.

8. Carbon Purchase Through IDX Carbon
   In an effort to support the Indonesian Government's target to reduce national emissions and achieve NZE, BNI Group through BNI Sekuritas also participates in carbon trading on the IDX Carbon exchange.

PT BNI Life Insurance

1. Implementation of sustainable finance training program with total participants of 688 employees;
2. Implementation of social, environmental and literacy responsibility program through natural disaster relief, construction/repair of places of worship, social fund assistance, health assistance, education fund assistance and environmental fund assistance;
3. Implementation of productive credit life insurance marketing program to MSMEs;
4. Implementation of efficiency program to reduce plastic waste, paper usage and electricity & water consumption;

Description	Consumption	
	2023	2024
Electricity:		
Centennial Tower	1,203,149 kWh	1,160,892 kWh
Gd. BNI Life KS. Tubun	457,032 kWh	713,809 kWh
Total	**1,660,181 kWh**	**1,874,701 kWh**

Description	Consumption	
	2023	2024
Water:		
Centennial Tower	616 m^3	500 m^3
Gd. BNI Life KS. Tubun	3,017 m^3	5,080 m^3
Total	**3,633 m^3**	**5,580 m^3**
Paper	1,855,294 Sheet	1,832,789 Sheet
Plastic	Changed the provision of bottled water to the use of pitcher & paper cups in 30 meeting rooms.	It has been applied to 30 meeting rooms.

5. Implementation of finetuning to the organization by reviewing business processes and increasing digitalization of sustainable finance activities.

PT Bank Hibank Indonesia

In keeping with RAKB's implementation strategy, the top priority for 2024 are increasing the financing portfolio, investments, or placement in financial instruments or projects that are in line with the implementation of Sustainable Finance, which is supported by activities such as;

1. Advanced HR development;
2. Portfolio development;
3. Supervision and reporting;
4. Preparation of a business management system that integrates social, environmental, and governance components in risk management;
5. Customer education

By 2024, the Bank had implemented most of the work plans as contained in the 2024 RAKB;

Achievement of RAKB in 2024

No	Priority Activity Target	Success Indicator	Realization in 2024
a	Social, environmental, and governance risks have been integrated into the bank's business activities.	Standard Operating Procedure (SOP) has been established regarding the integration of social, environmental, and governance risks into business activities related to credit/financing and sustainable financial products/ services.	The Company Guidelines No. 2.2.0.0/R.00/ PP/VIII/2024 on Environmental, Social, and Governance (ESG) Policy have been issued.
b	Increase the KKUB Portfolio (based on KKUB mapping).	The existing KKUB portfolio of mapping debtors increased by 9.26% from 2023.	The Credit Portfolio to Sustainable Business Activities (KKUB) as of December 2024 was IDR6.6T, up 58.01% from Dec'23 which was IDR4.18T.
c	Enhance the Portfolio of Environmentally Friendly Mutual Funds.	The sustainable category Mutual Fund portfolio increased by at least 10% from 2023.	- New initiatives for placement in sustainability-based bond instruments amounting to IDR155 M, up 24% from Dec'23 which was IDR125 M. - Placement of Sri Kehati Index mutual funds as of December 2024 amounting to IDR104.5 million, down 24.8% from Dec'23 which was IDR139 million.

1. The Bank is committed to increasing credit distribution to Sustainable Business Activities (KKUB) on an ongoing basis, including credit distribution to cooperation projects between the private sector and Regional Public Companies (Perumda) in the construction of Water Treatment Plants (WTP) and construction of Water Treatment Installations to ensure good clean water production and meet the standards of the Minister of Health Regulation in Bekasi, West Java.
2. The calculation of the Sustainable Business Activity Credit (KKUB) portfolio is carried out using the largest debtor sampling method with the number of samples in accordance with the stages regulated by the OJK, to determine the amount of the KKUB Portfolio. From the mapping results of the 250 largest existing debtors in December 2024, the KKUB portfolio was recorded at IDR6.6 trillion, an increase of 58.01% (YoY).
3. In connection with the Bank's changes and strategies, the amount of portfolio (assets under management or AUM) of sustainable category Mutual Funds amounted to IDR104.5 million, decreased by 24,8% (YoY), but on the other hand, the Bank's fund placement in Green Bonds investment instruments reached IDR155 billion, an increase of 24% (YoY) from December 2023 which was IDR125 billion.

Realization of Sustainable Finance Credit (KKUB) Portfolio in 2024

Description	Realization in 2024	
1. Number of products that meet the criteria for sustainable business activities		
1. Fund Raising	-	-
2. Fund Disbursement *	4 products (PRK, Term Installment Loan, Term Loan and Commercial Property Loan)	IDR6.6 trillion
2. Total Earning Assets of Sustainable Business Activities (IDR million)		
1. Total loans/financing of sustainable business activities*		6,603,280.71
2. Total Non-credit/Financing of Sustainable Business Activities*		6,617,108.42
3. Percentage of total credit/financing of sustainable business activities to total bank credit/financing (%)		49.59%
3. Amount and quality of credit/financing by category of sustainable business activities *		
	OS Balance (IDR million)	NPL (%)
1. Renewable Energy	22,746.46	0
2. Energy Efficiency	161,360.52	0.02%
3. Pollution Prevention and Control	0	0
4. Sustainable Management of Living Natural Resources and Land Use	11,000.00	0
5. Conservation of Land and Water Biodiversity	0	0
6. Environmentally Friendly Transportation	0	0
7. Sustainable Water and Wastewater Management	274,500.00	0.08%
8. Climate Change Adaptation	0	0
9. Products that Can Reduce Resource Use and Produce Less Pollution (Ecoefficient)	639,668.66	0
10. Environmentally Sound Buildings that Meet Nationally, Regionally, or Internationally Recognized Standards or Certifications	233,596.88	0
11. Other Environmentally Sound Business Activities and/or Other Activities	1,238,329.94	0
12. MSME Activities	4,022,078.26	0
Total	**6,603,280.72**	**0.10%**

*) based on loan ceiling

In addition to distributing credit to 11 KUB and MSMEs, the Bank also carries out initiatives for sustainability which are part of its Social and Environmental Responsibility (TJSL), including:

1. Economic Aspect
   a. Use of furniture materials produced by MSMEs for the interior of the hibank Head Office;
   b. hibank supports the empowerment of the MSME ecosystem by collaborating with Sarga.co and the Sunmor SSA MSME Association in the Hi Pasar Digital MSME at the Sarga Festival 2024, which took place at the Sultan Agung Stadium, Bantul, Yogyakarta.
   c. This collaboration includes socialization and education for around 300 MSMEs, as well as being part of the Three Crowns Cup horse racing event. hibank's participation reflects the company's commitment to increasing banking access for MSMEs, encouraging them to improve their business class;
   d. hibank has consistently distributed funding to the MSME community with a channeling scheme through fintech that focuses on MSMEs, which has reached IDR1.56 trillion in 2024, up 174.6% (YoY) from 2023 which was IDR569.24 billion.
2. Social and Environmental Aspects
   a. CSR activities are prioritized on activities that have an impact on increasing Corporate Awareness and sustainable finance. Until December 2024, hibank has carried out CSR activities, namely;
      i. Organizing a Blood Donation activity at the Tomang Head Office with a total of 108 registrants and successfully donating 78 blood bags.
      ii. Participating in BNI CSR in order to welcome Eid al-Fitr 2024, including the Riyadul Muftadi'in Annur Islamic Boarding School Well Procurement Program in Sukabumi, Basic Food Assistance for the Poor and Orphans in South Tangerang, Renovation of the Al Ikhlas Prayer Room in Bekasi, and Happy Eid with People with Mental Disorders in Bekasi.
      iii. Participating in the Fund Participation at the "Volunteer of the Year" event organized by the Indonesian Red Cross on December 22 and December 27, 2024 with 2 series of events, namely Healthy Walk and Volunteer Award.
   b. Saving Resources and Energy
      After occupying the new Non-Operational Head Office (KPNO) location at Rajawali Place, 22nd and 23rd floors, Setiabudi, South Jakarta, the Bank implemented a policy to encourage saving resources, namely;
      i. **Paperless/digitalization.** The Bank encourages the use of digital devices in daily operations, such as online approvals to minimize paper usage.
      ii. **Use of used paper.** The use of paper is prioritized to utilize used/recycled paper, so as not to reduce the purchase of new paper;
      iii. **Centralization of printer machines.** Replacing portable printers with centralized printers, which also function as scanners and photocopiers, to facilitate cost control over paper and electricity usage;
      iv. **Turning off room lights.** Turning off lighting during break time from 12.00 - 13.00, to support electricity efficiency;
      v. **Workspace with Open Space design**. hibank Head Office is designed with an open workspace concept that maximizes natural lighting to reduce electricity consumption and water usage.

The initiatives taken have an impact on reducing the use of electricity, water and paper resources, as shown in the following table:

Average Consumption of Electricity, Water and Paper (per month) at Head Office (Ex KP Tomang and New KP Rajawali Place)

Component	Unit	2020	2021	2022	2023	2024	YoY Growth
Electricity	kWh	95,981	87,877	86,017	93,043	48,986	(47.35%)
Water	Cubic	582	424	466	497	250	(49.70%)
Paper		260	205	153	201	176	(12.44%)
- A4 size	Ream	241	195	146	194	169	(12.89%)
- Folio size	Ream	19	10	7	7	6	(14.29%)

In 2024, the average consumption of electricity, paper and water resources at the hibank Head Office was recorded as follows;

1. Electricity usage in January-December 2024 averaged 48,986 kWh, down 47.35% from the average in January-December 2023 of 93,043 kWh;
2. Clean water usage in January-December 2024 averaged 250 cubic meters, down 49.70% from the average in January-December 2023 of 497 cubic meters;
3. Paper usage in January-December 2024 was 176 reams, down 12.44% from the average in January-December 2023 of 201 reams.

3. Governance Aspect
   In alignment with the Bank's vision to become Indonesia's leading MSME Digital Bank, committed to sustainable finance, the Bank strives to foster an inclusive and environmentally friendly economy through digital innovation. To support this vision, the Bank has established an Environmental, Social, and Governance (ESG) policy, outlined in Corporate Guideline No. 2.2.0.0/R.00/PP/VII/2024. This policy serves as a guide for all employees in implementing the ESG approach, ensuring compliance with the principles of Good Corporate Governance.

PT BNI Modal Ventura

1. Enhancing its HR capabilities, particularly in sustainable finance, by providing seminars, workshops, and/or training sessions, both offline and online to 17 employees in 2024. Additionally, BNI Ventures has partnered with BNI Corporate University and LinkedIn Learning in the provision of training for employees.

	Number of employees and Directors who received training (people)	Training hours (hours)	Average training hours per employee (hours/person)
Overall	19	2,666	140
By gender			
Male	9	1,631	181
Female	10	1,035	103
By position			
Director	2	247	123
Staff	17	2,419	142

2. Improving the quality of the work environment and HR by, among others:
   - Conducting regular team building to build familiarity among all employees.
   - Providing training and/or certification for all employees.
   - Using air quality filtration and monitoring services to improve the quality of clean air in the work environment.
   - Providing gym membership facilities for employees as a means to maintain employee health and fitness.
   - Providing medicines and first aid for employees.
   - Implementing a clean desk policy to maintain the cleanliness and comfort of the work environment.
   - Cleaning the work area regularly.
   - Provide BPJS Employment facilities and health insurance for all employees.

3. Participate in social/environmental/religious/educational activities, as well as programs to improve public financial literacy, especially related to sustainable finance that has an impact on corporate awareness. Until December 2024, BNI Ventures has carried out Corporate Social Responsibility activities to related stakeholders, namely:
   - Organizing Safari Ramadhan activities in the context of Eid al-Fitr 2024 by providing assistance to orphans and management foundations.
   - Supporting the religious activities of Dharma Santi BUMN 2024 organized by KBUMN.
   - Increasing public financial literacy, especially related to sustainable finance in the venture capital industry, through various seminar events, workshops and visits, the implementation of which is in collaboration with related partners.

Until the end of the December 2024 period, BNI Ventures has implemented a resource saving policy, including;

i. Implementing a paperless policy for a number of internal administrative needs, by optimizing information technology facilities for digital document circulation and signing.
ii. Utilizing file paper by paying attention to the sensitivity of the document content, using both sides of the paper when printing documents, and maximizing the use of laptops for taking notes.
iii. Using tumblers and glasses for drinking water needs in the work environment, using plates and cutlery that can be washed and reused, and shopping bags or used cardboard for shopping needs, so as to reduce plastic waste.
iv. Energy management is one of BNI Ventures' priorities in its operational activities, including:

- Using LED lights in the work environment that are more energy efficient.
- Arranging space with an open office concept so as to maximize the use of sunlight (natural light) for office lighting in the morning to evening, so as to reduce energy consumption.
- Using laptops as work devices for all BNI Ventures employees, so that they are more energy efficient.
- Optimizing and efficiency in the use of water and electricity in the work environment.
- Use of electric cars for official cars of the Board of Directors, efficiency of travel routes and employee mobility, filling up with petrol according to the type of fuel needed in the car, and driving at standard speeds so as to minimize fuel use and energy consumption.

Component	Unit	2024
Electricity	kWh	80.876 kWh
Paper	Ream	43 Rim
Use of Premium/Pertamax and similar	Liter	1.025 Liter (Pertamax)
	kWh	278 kWh

4. BNI Ventura es is developing an investment assessment process as part of a strategy to encourage the implementation of sustainable finance. This process includes steps that will be taken by BNI Ventura to integrate sustainable finance as one of the main parameters in the evaluation. In addition, BNI Ventura has also conducted an analysis of existing Business Partners to assess their contribution to the implementation of sustainable finance principles.

PT BNI Asset Management

1. Conducting socialization to all BNI-AM employees in the form of workshops related to the Concept of Sustainable Finance (KKB) and Environmental Social Governance (LST).
2. Conducting training and certification related to KKB and LST, including CertSF (Certification Sustainability for Finance) certification from ACCA.
3. Encouraging BNI-AM employees and clients/customers to invest in ESG-based products through the Champion program related to KKB and LST. Currently, BNI-AM has an ESG-based Mutual Fund product, namely the BNI AM Sri Kehati Index RD.
4. Reviewing external regulations related to KKB and LST including the issuance of IFRS S1 and S2, and participating in training related to S1 and S2 standards at the Indonesian Institute of Accountants.
5. Forming a task force team to prepare SOPs and organizations related to KKB and LST.

BNI Securities Pte Ltd

1. Increasing discussions with customers regarding the issuance of green bonds and so on in the primary market, including trying to increase trading in the secondary market;
2. Increasing the efficiency of irreplaceable resources to reduce plastic waste, paper use and electricity & water consumption; and
3. Internal socialization of sustainable finance activities as well as environmental, social and governance.

ESG Index: BNI Sustainability Practice Summary

ENVIRONMENTAL

Environmental

COMPANY PRACTICE	PAGE
Environmental Impact Financing	
Scope of management systems to assess ESG risks in financing activities	
• BNI has implemented a management system to assess ESG risk for all loan and investment banking operations. • BNI has extended the integration of ESG risk in the underwriting process to other industrial sectors as one of the strategies for managing loan risk in 2024.	Sustainability Report page 92-98
Environmental loan policy	
BNI has developed Risk Acceptance Criteria (RAC) for 22 industrial sectors in the Corporate and Enterprise segment, 18 industrial sectors in the Commercial segment, and 10 industrial sectors in the Retail Productive segment.	Sustainability Report page 17
BNI actively participates in the development of the social forestry program aimed at promoting economic equality, improving the welfare of communities around forest areas, and preventing illegal logging through sustainable forest management.	Sustainability Report page 98
BNI has established credit policies that define Risk Acceptance Criteria (RAC) as a prerequisite for extending credit to certain industrial sectors. These general credit policies are determined by the Credit Policy Committee, while environmental and social risk assessments are conducted by the Risk and Capital Management Committee. Additionally, evaluations are carried out by the Audit Committee.	Sustainability Report page 137
Integration of ESG Risk Management	
To strengthen oversight in policy formulation and management of Environmental, Social & Governance (ESG) aspects, BNI established an ESG Subcommittee under the Risk Management & Anti-Fraud Committee. This subcommittee is chaired by the Deputy President Director, with the Risk Management Director serving as Vice Chair. The Head of the Bank's Risk Management Division acts as the committee secretary.	Annual Report page 1175
BNI conducts a Climate Risk StressTest (CRST)as part of its Climate Risk Management System, in compliance with mandates from the Financial Services Authority (OJK). In 2024, the CRST was implemented on 50% of BNI's credit portfolio, with plans to extend it to the entire credit portfolio by 2025.	Annual Report page 1174, 1181
All BNI staff undergo training on ESG risks and procedures, with legitimate evidence of the ESG training program provided as part of the bank's commitment to capacity building in this critical area.	Annual Report page 1185
ESG Risk Management Supervision	
• Active supervision by the Board of Commissioners and Board of Directors in the implementation of risk management, including the determination of the risk appetite and risk tolerance framework, risk control tools, and the framework and implementation of integrated risk management. • To strengthen supervision in terms of determining Environmental, Social & Governance (ESG) policies and management, BNI has formed an ESG subcommittee in the Risk Management & Anti-Fraud Committee chaired by the Deputy President Director and the Director of Risk Management as deputy chair.	Sustainability Report page 17
Through the ESG subcommittee under the Risk Management and Anti-Fraud Committee, the Board of Directors is actively involved in ESG risk management including: • Preparing Environmental, Social, & Governance (ESG) management policies and strategies and their changes; • Identifying potential ESG risks that have an impact on both BNI and BNI stakeholders; • Monitoring the implementation of the Sustainability Finance strategy; • Monitoring, evaluating and providing recommendations on the results of BNI's ESG Assessment; • Evaluating the implementation of ESG strategies in all BNI business lines.	Sustainability Report page 134
ESG Risk Management System	
BNI has developed a robust management system to assess ESG risks in financing activities, which are outlined in the form of: • Industry Risk Rating • Prospective Sector • Industry Risk Appetite • Risk Acceptance Criteria	Sustainability Report page 136

COMPANY PRACTICE	PAGE
Sustainable Finance Opportunities	
• As part of a strategic step to support a green economy, BNI has expanded the scope of financing emission calculations, which previously only covered the Corporate, Enterprise and Medium segments, now covering the Micro, Small and Medium Enterprises (MSMEs) segment. • BNI has distributed SLL financing of IDR6.0 trillion to 5 sectors, namely the steel processing industry sector, the livestock and food processing industry sector, the cement processing industry sector, the plastic goods industry sector and the coal product industry sector.	Sustainability Report page 41
BNI has a total financing portfolio with the Sustainable Business Activity Category (KKUB) worth Rp190.5 trillion, mainly in the form of financing to the MSME segment, sustainable natural resource management, energy efficiency and renewable energy.	Sustainability Report page 36

SOCIAL

Social

COMPANY PRACTICE	PAGE
Consumer Financial Protection	
Practice	
BNI always strives to ensure the implementation of fair operational practice policies and in accordance with Bank policies and applicable regulations. In operational practices, BNI guarantees the following: a. Preventing conflicts of interest b. Prohibition on giving & receiving gifts or souvenirs c. Provisions and prohibitions on abuse of office and gratification d. In order to realize Good Corporate Governance, BNI implements a Whistleblowing System (WBS) e. Customer protection policy and provision of Information/Data/Documents to external parties f. Policy on fulfilling creditor rights g. Anti-corruption and anti-fraud policies	Annual Report page 1028 (APUPPT) Annual Report page 1053 (Protection of Creditors' Rights) Annual Report page 1033 (Anti-Corruption Policy) Annual Report page 1035 (Anti-Gratification & Anti-Bribery Policy) Annual Report page 1080 (Whistleblowing System) Annual Report page 1082 (Conflict of Interest) Sustainability Report page 459-460 (Consumer Protection)
The Board of Directors has high involvement in product supervision through the Product Committee, with duties and responsibilities including: 1. Determining the size and business development strategy through BNI products/activities; 2. Conducting comprehensive testing and deciding on the "feasibility" of new products/activities, especially related to cross-sectoral/segment alliances and strategic alliances with subsidiaries/other companies outside BNI by inviting the relevant Sector Directors; 3. Monitoring products/activities implemented in BNI and making decisions on the sustainability of products/activities based on the recommendations of the Supporting Staff Group/product owner; 4. As an arbitration institution in cross-sectoral issues related to the implementation of new products/ activities.	Annual Report page 877
BNI carries out transparent marketing communications in accordance with OJK provisions and in accordance with the Company's Internal policies.	Annual Report page 369
BNI has an independent settlement system that can provide protection for reporting parties and special training on internal and external protection programs.	Annual Report page 1080
Regarding Debt Collection Policy, BNI has well-defined loan modification options that include income-based considerations and customer access to escalation options.	Annual Report page 340-342

COMPANY PRACTICE	PAGE
BNI runs BNICorpuTV on YouTube channel to educate the public about financial literacy and current trends in society by presenting speakers from BNI and professional institutions. Education is also carried out through social media and cooperation with various government/private agencies.	Annual Report page 1008-1025
The BNI Board-level Committee supervises complaints.	Annual Report page 1081
Human Resource Development	
Practice	
• BNI provides training and competency development in all aspects of the Company's operations in a planned and sustainable manner by upholding equal opportunities for all levels of the organization and gender. Throughout 2024, BNI provided training and development programs organized by internal and external parties of the Bank to 272.351 employees or 98.72%, with an average of 8.6 training sessions for each employee. • BNI has a program that covers all employees (including part-time and contract). • Since 2018, BNI has had a mandatory learning program for all employees through Sustainable Finance e-learning to increase awareness and capabilities regarding the practice of integrating environmental, social, and governance (ESG) criteria into financial services to realize sustainable development outcomes, including mitigation and adaptation to the negative impacts of climate change.	Annual Report page 64
Strategy	
BNI has a Whistleblowing System (WBS) called "WBS to CEO", which is one of the early detection mechanisms for violations in BNI that can cause financial losses including things that can damage BNI's image. WBS management is carried out through collaboration with external parties, namely Deloitte.	Annual Report page 1080
BNI conducts employee satisfaction surveys along with employee engagement. In 2024, Employee Engagement Survey (EES)/Employee Engagement Rate 96%	Annual Report page 1176
Talent Development Strategy	
The workforce planning strategy is aimed at ensuring the availability of employees in functions that are aligned with BNI's strategy. Recruitment is carried out through various programs including the Officer Development Program, Assistant Development Program and Experience Hire. In 2024, BNI will strengthen the talent acquisition mechanism by perfecting the ODP General (ODP Commercial and Global Analyst), ODP IT and ODP Data Analytics policies. In addition to the Bina internship program, BNI also has an internship program for students. Among others, through the Talented Generation Internship (MAGENTA) program through the magentaku.id platform owned by the Ministry of SOEs and the Certified Independent Internship and Study Program (MSIB) through the Kampus Merdeka platform owned by the Ministry of Culture, Research, and Technology (Kemendikbudristek). BNI organizes the Bina BNI Internship Program which aims to provide training and job guidance to the inexperienced workforce by providing the knowledge, skills, and abilities needed to be able to compete in the world of work. Bina BNI internship participants in 2024 are spread across all BNI operational areas. In order to provide learning solutions for employees, BNI Corporate University has provided various learning facilities and infrastructure that are arranged both in-house and in partnership with educational institutions.	Annual Report page 416-431
Programs & Initiatives	
BNI has designed a stock ownership program for employees and management of the Company based on the approval given by shareholders at the 2022 Annual General Meeting of Shareholders held on March 15, 2023. The stock ownership program for the Company's management was implemented on August 14, 2023.	Annual Report page 1072-1077
The remuneration strategy covers all employees, which is determined based on the principles of supply and demand, BNI's remuneration position compared to the market, and considering employee talent classification. The employee remuneration components consist of fixed remuneration which is differentiated based on job weight and person value, while variable remuneration is given based on performance that is linked to the achievement of bank performance, unit performance and the performance of the employee concerned.	

COMPANY PRACTICE	PAGE
BNI provides training and competency development at all levels in the Company which is carried out in a planned and sustainable manner by upholding the provision of equal opportunities, and is adjusted to the training and development needs at each level.	Annual Report page 161-167
The realization of Education and Training Costs in 2024 is IDR 200.98 billion with the average frequency of training per year increasing from 8.6 times/employee (2023) to 10 times/employee (2024).	
Access to Finance	
Products and Strategies	
BNI is a direct provider or is directly involved in providing services in Micro/Microinsurance services.	Sustainability Report page 68
Distribution and Reach	
In supporting customer convenience in conducting banking transaction activities, BNI offers various e-Banking facilities that are constantly being improved through various developments and innovations.	Annual Report page 459
In order to expand its reach, BNI has more than 213 thousand BNI Agen46 which are BNI partners in providing banking services to the community in the context of inclusive finance. Agen46 can facilitate various banking services to help distribute government programs, such as the distribution of social assistance and subsidies.	Annual Report page 5 Sustainability Report page 70
Leading innovation in alternative branchless distribution channels targeting underserved demographics through Digital and Agen46 services.	Sustainability Report page 99
Privacy & Data Security	
Practice - Operational	
• BNI guarantees that customers can update data, change, access and update data changes through BNICall and Customer Service. • BNI has a data protection and information security policy that regulates all related business lines/ subsidiaries. • BNI's consumer data/information protection policy is carried out in accordance with Bank Indonesia Regulation (PBI) No. 22/20/PBI/2020 dated December 22, 2020 concerning Consumer Protection and Regulation of the Members of the Board of Governors of Bank Indonesia No. 23/17/PADG/2021 dated September 9, 2021 concerning Procedures for Implementing Bank Indonesia Consumer Protection.	Annual Report page 931 Sustainability Report page 60
BNI launched an innovation in applying for credit cards and other consumer credit through e-forms, as well as opening digital accounts through mobile banking to reduce the potential for misuse of customer data, because data is directly stored in the system without going through physical forms.	Annual Report page 452-456
BNI formed a special organization (Information Security Division) that combines several units that have functions related to information security to maintain independence and focus more on evaluating, implementing, monitoring and improving cyber security.	Sustainability Report page 60
BNI continues to develop digital banking services to make it easier for customers, while facing the challenges of data security and privacy protection from cybercrime threats. BNI is committed to managing this risk and protecting human rights.	Sustainability Report page 60
BNI also strengthens technology, digital innovation, and data security systems, and complies with customer privacy protection regulations, such as OJK regulations and the Personal Data Protection Law.	Sustainability Report page 60
To ensure the reliability of the system and information security, technology audits are carried out periodically by the internal audit unit. Assessments from external parties include those carried out by the National Cyber and Crypto Agency (BSSN) through the Information Security Index (Indeks KAMI).	Annual Report page 679 Sustainability Report page 66

COMPANY PRACTICE	PAGE
The Technology Management Committee is one of the permanent committees at BNI that has the authority to provide recommendations to the Board of Directors regarding the formulation, determination of policies and strategies for developing BNI's information technology. This committee was formed with the aim of assisting the Board of Commissioners and Board of Directors in carrying out supervision of Information Technology (IT) activities, including those related to cyber security.	Annual Report page 447
Practice - Employees	
BNI provides employees in the IT Work Unit with various training to develop soft skills and hard skills. Hard skill provision is carried out through project management training, IT architecture, programming, CI/CD, secure coding, cloud security, and so on, which are carried out in-house or through Linkedin Learning, Google and AWS training, and other training media. For all employees, awareness of data security and/or privacy-related risks and procedures is also raised through training and digital mindset development.	Annual Report page 447-448

GOVERNANCE

Governance

COMPANY PRACTICE	PAGE
Governance	
Governance	
Salary Figures Executive Pay Disclosure	Annual Report page 784-786
Ownership Structure • Controlling Shareholders • Controlling Shareholders to Watch Out For	Annual Report page 168-174
One Share One Vote • Multiple Equity Classes with Different Voting Rights • Government Intervention to Watch Out For	Annual Report page 636
Board of Directors	
BOARD OF DIRECTORS INDEPENDENCE • Executive Officers in the Board of Directors • Transactions with Related Parties	Annual Report page 130-155,
BOARD OF DIRECTORS EXPERTISE & DIVERSITY There are 25% Female Directors	Annual Report page 388
Salary	
PAYMENT FIGURES Executive Officer Pay Disclosure	Annual Report page 784-786
PAYMENT • CEO Equity Policy • Clawback & Malus • Sustainability-Linked Pay	Annual Report page 768-787
Shareholding & Controllers	
DIRECTOR ELECTION • Annual Director Election • Proxy Acces	Annual Report page 653
ONE SHARE ONE VOTE • Multiple Equity Classes with Different Voting Rights	Annual Report page 636
SHAREHOLDER RIGHTS • Right to Speak on Pay Policy	Annual Report page 631
Accounting	
ACCOUNTING RISK Expenses Recognition	Annual Report page 327

COMPANY PRACTICE	PAGE
Business Ethics	
Business Ethics Policy & Practice	
BNI has a Board of Directors or C-suite committee or executive committee that oversees ethical issues.	Annual Report page 892
BNI has a detailed formal policy on bribery and anti-corruption.	Annual Report page 1035
BNI conducts an audit of all operations at least once every three years.	Annual Report page 982
BNI has a formal anonymous whistleblower system with legal protection for whistleblowers through the Whistleblowing System (WBS) managed with an external party, Deloitte.	Annual Report page 1080
BNI has a standard ethics training programme covering all employees (including part-time employees) and contractors.	Annual Report page 1044-1047
All BNI suppliers are required to have an anti-corruption policy and programme for compliance verification.	Annual Report page 1033
BNI has an Anti-Money Laundering Policy. Policy and implementation strategy explained.	Annual Report page 1028
Tax Transparency	
The implementation of tax transparency has referred to the regulations or policies of the Government.	Annual Report page 1027

10

Financial Statements



Financial Statements


BNI

PT BANK NEGARA INDONESIA (PERSERO) Tbk DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN KEUANGAN KONSOLIDASIAN/
CONSOLIDATED FINANCIAL STATEMENTS

31 DESEMBER 2024 DAN 2023/
31 DECEMBER 2024 AND 2023

BNI

PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK

SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB ATAS
LAPORAN KEUANGAN KONSOLIDASIAN
PADA TANGGAL 31 DESEMBER 2024 DAN 2023
SERTA UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023

No. DIR/ 071

Kami yang bertanda tangan di bawah ini:

1. Nama : Royke Tumilaar
   Alamat Kantor : Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia
   Alamat Domisili : Komp.Billy & Moon Blok L5/10 RT.007 RW.010 Pondok Kelapa, Duren Sawit, Jakarta Timur
   Nomor Telepon : 021-5728043
   Jabatan : Direktur Utama

2. Nama : Novita Widya Anggraini
   Alamat Kantor : Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia
   Alamat Domisili : GR.BJ FEDORA Blok J-20/10 RT.006 RW.015 Serpong Utara, Tangerang Selatan
   Nomor Telepon : 021-5728025
   Jabatan : Direktur Finance

menyatakan bahwa:

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak;
2. Laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;
3. a. Semua informasi dalam laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak telah dimuat secara lengkap dan benar;
   b. Laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material;
4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak.

Demikian pernyataan ini dibuat dengan sebenarnya.

PT BANK NEGARA INDONESIA (PERSERO) Tbk
AND SUBSIDIARIES

DIRECTORS' STATEMENT
REGARDING THE RESPONSIBILITY FOR
THE CONSOLIDATED FINANCIAL STATEMENTS
AS OF 31 DECEMBER 2024 AND 2023
AND FOR THE YEARS ENDED
31 DECEMBER 2024 AND 2023

No. DIR/ 071

We, the undersigned:

1. *Name* : *Royke Tumilaar*
   Office address : *Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia*
   Residential Address : *Komp.Billy & Moon Blok L5/10 RT.007 RW.010 Pondok Kelapa, Duren Sawit, Jakarta Timur*
   Telephone : *021-5728043*
   Title : *President Director*

2. *Name* : *Novita Widya Anggraini*
   Office Address : *Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia*
   Residential Address : *GR.BJ FEDORA Blok J-20/10 RT.006 RW.015 Serpong Utara, Tangerang Selatan*
   Telephone : *021-5728025*
   Title : *Managing Director – Finance*

declare that:

1. *We are responsible for the preparation and the presentation of PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements;*
2. *PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards;*
3. a. *All information in the PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements have been disclosed in a complete and truthful manner;*
   b. *PT Bank Negara Indonesia (Persero) Tbk and subsidiaries' consolidated financial statements do not contain any incorrect information or material facts, nor do they omit material information or material facts;*
4. *We are responsible for PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' internal control system.*

Thus this statement is made truthfully.

Atas nama dan mewakili Direksi/*For and on behalf of the Directors*

Jakarta, 22 JAN 2025

METERAI TEMPEL

Royke Tumilaar
Direktur Utama/
President Director

Novita Widya Anggraini
Direktur Finance/
Managing Director – Finance

PT Bank Negara Indonesia (Persero) Tbk
Kantor Pusat
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pwc

LAPORAN AUDITOR INDEPENDEN
KEPADA PARA PEMEGANG SAHAM

INDEPENDENT AUDITORS' REPORT
TO THE SHAREHOLDERS OF

PT BANK NEGARA INDONESIA (PERSERO) TBK

Opini

Kami telah mengaudit laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan entitas anaknya ("Grup"), yang terdiri dari laporan posisi keuangan konsolidasian tanggal 31 Desember 2024, serta laporan laba rugi dan penghasilan komprehensif lain konsolidasian, laporan perubahan ekuitas konsolidasian dan laporan arus kas konsolidasian untuk tahun yang berakhir pada tanggal tersebut, serta catatan atas laporan keuangan konsolidasian, termasuk informasi kebijakan akuntansi material.

Menurut opini kami, laporan keuangan konsolidasian terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan konsolidasian Grup tanggal 31 Desember 2024, serta kinerja keuangan konsolidasian dan arus kas konsolidasiannya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Opinion

We have audited the consolidated financial statements of PT Bank Negara Indonesia (Persero) Tbk and its subsidiaries (the "Group"), which comprise the consolidated statement of financial position as at 31 December 2024, and the consolidated statement of profit or loss and other comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2024, and its consolidated financial performance and its consolidated cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

Basis opini

Kami melaksanakan audit kami berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia. Tanggung jawab kami menurut standar tersebut diuraikan lebih lanjut dalam paragraf "Tanggung jawab auditor terhadap audit atas laporan keuangan konsolidasian" pada laporan kami. Kami independen terhadap Grup berdasarkan ketentuan etika yang relevan dalam audit kami atas laporan keuangan konsolidasian di Indonesia, dan kami telah memenuhi tanggung jawab etika lainnya berdasarkan ketentuan tersebut. Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini audit kami.

Basis for opinion

We conducted our audit in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants. Our responsibilities under those standards are further described in the "Auditors' responsibilities for the audit of the consolidated financial statements" paragraph of our report. We are independent of the Group in accordance with the ethical requirements that are relevant to our audit of the consolidated financial statements in Indonesia, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Hal audit utama

Hal audit utama adalah hal-hal yang, menurut pertimbangan profesional kami, merupakan hal yang paling signifikan dalam audit kami atas laporan keuangan konsolidasian periode kini. Hal-hal tersebut disampaikan dalam konteks audit kami atas laporan keuangan konsolidasian secara keseluruhan, dan dalam merumuskan opini kami atas laporan keuangan konsolidasian terkait, kami tidak menyatakan suatu opini terpisah atas hal audit utama tersebut.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

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Nomor Izin Usaha: KEP-315/KM.1/2024

Hal audit utama yang teridentifikasi dalam audit kami diuraikan sebagai berikut.

1. **Kerugian kredit ekspektasian ("KKE") - cadangan kerugian penurunan nilai atas pinjaman yang diberikan**

   Seperti yang dijelaskan dalam Catatan 12 atas laporan keuangan konsolidasian, pada tanggal 31 Desember 2024, cadangan kerugian penurunan nilai atas pinjaman yang diberikan Grup adalah sebesar Rp 38.684.520 juta.

   Cadangan kerugian penurunan nilai atas pinjaman yang diberikan ditentukan oleh Grup berdasarkan kerangka KKE sesuai dengan PSAK 109: "Instrumen Keuangan", seperti yang dijelaskan dalam Catatan 2c.(x) atas laporan keuangan konsolidasian.

   Kami memberikan fokus pada area ini karena nilai tercatat atas pinjaman yang diberikan mewakili 69% dari total aset Grup pada tanggal 31 Desember 2024 dan besarnya nilai cadangan kerugian penurunan nilai yang dibentuk atas pinjaman tersebut nilainya signifikan terhadap laporan keuangan konsolidasian Grup. Lebih lanjut, perhitungan cadangan kerugian penurunan nilai melibatkan pertimbangan manajemen yang subjektif dan penggunaan estimasi dengan tingkat ketidakpastian yang tinggi.

   Untuk pinjaman yang diberikan dimana Grup menghitung KKE secara individual, Grup menggunakan estimasi arus kas ekspektasian dari pinjaman yang diberikan. Hal ini membutuhkan pertimbangan signifikan dalam mengestimasi probabilitas rata-rata tertimbang kerugian kredit, serta estimasi waktu dan jumlah pembayaran dari pinjaman yang diberikan.

   Untuk pinjaman yang diberikan dimana Grup menghitung KKE secara kolektif, Grup menggunakan model KKE dengan beberapa asumsi utama, antara lain, probabilitas rata-rata tertimbang dari *probability of default*, *loss given default* dan *exposure at default*, setelah memperhitungkan faktor perkiraan masa depan dan informasi eksternal lainnya termasuk proses identifikasi atas pinjaman yang diberikan yang mengalami peningkatan risiko kredit secara signifikan.

The key audit matters identified in our audit are outlined as follows.

1. ***Expected credit losses ("ECL") - allowance for impairment losses of loans***

   As described in Note 12 to the consolidated financial statements, as at 31 December 2024, the allowance for impairment losses of loans of the Group was IDR 38,684,520 million.

   The allowance for impairment losses of loans was determined by the Group based on the ECL framework under SFAS 109: "Financial Instruments", as described in Note 2c.(x) to the consolidated financial statements.

   We focused on this area as the carrying value of loans represented 69% of the total assets of the Group as at 31 December 2024 and the allowance for impairment losses provided against the loans was significant to the Group's consolidated financial statements. Furthermore, the calculation of the allowance for impairment losses involved subjective management judgement and was subject to a high degree of estimation uncertainty.

   For loans where the Group assessed ECL individually, the Group used the estimated cash flows which are expected to be obtained from the loans. This required significant judgement in estimating the weighted average probability of credit losses, and the timing and amount of the repayments of the loans.

   For loans where the Group assessed ECL collectively, the Group used an ECL model that incorporated key assumptions, such as, the weighted average probability of default, loss given default and exposure at default, after considering forward looking factors and other external information including the identification process over loans that had experienced a significant increase in credit risk.

Bagaimana audit kami merespons hal audit utama

Kami melakukan prosedur-prosedur audit berikut untuk merespons hal audit utama ini:

- Kami memperoleh pemahaman atas pendekatan Grup dalam mengidentifikasi aset keuangan yang mengalami peningkatan risiko kredit secara signifikan atau bukti objektif penurunan nilai, dan melakukan pengujian atas pengendalian yang relevan atas proses penetapan *rating* internal berdasarkan uji petik.

- Kami menguji keakurasian dari klasifikasi kualitas pinjaman yang diberikan berdasarkan uji petik dengan menelaah dokumen kredit dari debitur-debitur yang menjadi sampel.

- Kami menilai metodologi dan menguji asumsi pemodelan signifikan yang digunakan dalam model KKE, dengan bantuan pakar pemodelan kredit kami. Kami menguji *probability of default*, *loss given default* dan *exposure at default*, yang mencakup (i) evaluasi perkiraan makroekonomi Indonesia dengan membandingkan perkiraan dengan informasi yang tersedia untuk umum tentang prospek makroekonomi Indonesia; dan (ii) menguji kelengkapan dan keakuratan data yang digunakan dalam model dengan data aktual yang tersedia di Grup dengan melibatkan spesialis Teknologi Informasi ("TI") kami.

- Ketika bukti objektif penurunan nilai diidentifikasi oleh Grup dan kerugian penurunan nilai dihitung secara individual, kami menguji, berdasarkan uji petik, kecukupan cadangan kerugian penurunan nilai yang disiapkan oleh manajemen dengan membandingkan baik jumlah dan waktu dari arus kas masa depan yang digunakan oleh Grup dalam perhitungan kerugian penurunan nilai dengan jadwal pembayaran kembali yang tercantum dalam perjanjian pinjaman yang diberikan dan menguji probabilitas rata-rata tertimbang yang digunakan dalam menyusun arus kas.

- Kami melakukan perhitungan ulang untuk KKE yang dinilai secara kolektif dan menguji akurasi perhitungan KKE yang dinilai secara individual berdasarkan uji petik.

How our audit addressed the key audit matter

We performed the following audit procedures to address this key audit matter:

- *We understood the Group's approach over the identification of financial assets that have experienced a significant increase in credit risk or objective evidence of impairment and tested the relevant controls over the internal rating process on a sample basis.*

- *We tested the accuracy of the credit quality classification of a sample of loans by reviewing the credit files of those sampled debtors.*

- *We assessed the methodologies applied and tested the significant modelling assumptions used in the ECL models, with the assistance from our credit modelling expert. We tested the probability of default, loss given default and exposure at default, which included (i) evaluating the forecasts of Indonesia macroeconomics by comparing forecasts with publicly available information on the Indonesia macroeconomic outlook; and (ii) testing the completeness and accuracy of data used in the model with the actual data available within the Group by involving our Information Technology ("IT") specialists.*

- *When objective evidence of impairment was identified by the Group and impairment losses were individually calculated, we tested, on a sample basis, the adequacy of the allowance for impairment losses determined by management by comparing the quantum and timing of future cash flows used by the Group in the impairment loss calculation with the repayment schedule in the loan agreement and tested the probability-weighted outcomes used in preparing the cash flows.*

- *We recalculated the collective ECL and tested the accuracy of the individual ECL calculation on a sample basis.*

2. **Liabilitas kepada pemegang polis**

Seperti yang dijelaskan dalam Catatan 28 atas laporan keuangan konsolidasian, pada tanggal 31 Desember 2024, liabilitas kepada pemegang polis adalah sebesar Rp 18.446.596 juta.

Liabilitas kepada pemegang polis ditentukan oleh Grup sesuai dengan PSAK 104, "Kontrak Asuransi" seperti yang dijelaskan dalam Catatan 2y atas laporan keuangan konsolidasian.

Liabilitas kepada pemegang polis terdiri dari liabilitas manfaat polis masa depan, liabilitas kepada pemegang *unit link*, estimasi liabilitas klaim (termasuk klaim yang sudah terjadi namun belum dilaporkan ("IBNR")) dan cadangan atas premi yang belum merupakan pendapatan.

Kami memberikan fokus pada area ini karena estimasi atas liabilitas kepada pemegang polis melibatkan pertimbangan signifikan terhadap kejadian masa depan yang tidak pasti, termasuk suku bunga, tingkat mortalitas, tingkat morbiditas, tingkat *lapse*, inflasi, dan asumsi biaya, serta metodologi penilaian yang kompleks. Manajemen dibantu oleh pakar aktuaris untuk melakukan perhitungan liabilitas tersebut.

Bagaimana audit kami merespons hal audit utama

Kami melakukan prosedur-prosedur audit berikut untuk merespons hal audit utama ini:

- Kami memperoleh pemahaman dan menilai metodologi yang digunakan untuk perhitungan estimasi atas liabilitas kepada pemegang polis, dengan bantuan pakar aktuaris kami.
- Kami menilai kompetensi, kapabilitas, dan objektivitas pakar aktuaris manajemen yang membantu manajemen untuk melakukan perhitungan estimasi atas liabilitas kepada pemegang polis.
- Dengan bantuan pakar aktuaris kami, kami melakukan perhitungan ulang, secara uji petik, atas liabilitas manfaat polis masa depan, IBNR, dan mengevaluasi Pengujian Kecukupan Liabilitas ("LAT").
- Kami melakukan perhitungan ulang, berdasarkan uji petik, atas cadangan atas premi yang belum merupakan pendapatan dengan metode amortisasi harian.

2. ***Liabilities to policyholders***

As described in Note 28 to the consolidated financial statements, as at 31 December 2024, the liabilities to policyholders was IDR 18,446,596 million.

Liabilities to policyholders is determined by the Group based on SFAS 104, "Insurance Contract" as described in Note 2y to the consolidated financial statements.

Liabilities to policyholders represent liabilities for future policy benefits, liabilities to unit-linked holders, estimated claim liabilities (including claims incurred but not yet reported ("IBNR")) and unearned premium reserves.

We focused on this area as the estimation of the liabilities to policyholders involves significant judgement about uncertain future outcomes, including interest rate, mortality rate, morbidity rate, lapse rate, inflation and expense assumption, as well as complex valuation methodologies. Management was assisted by an actuarial expert in their calculation of the estimated liabilities.

How our audit addressed the key audit matter

We performed the following audit procedures to address this key audit matter:

- *We understood and assessed the methodology used to calculate the estimation of liabilities to policyholders, with assistance from our actuarial expert.*
- *We assessed the competency, capability and the objectivity of management's actuarial expert who assisted management in the calculation of the estimation of liabilities to policyholders.*
- *With assistance from our actuarial expert, we performed independent mathematical recalculation, on a sample basis, the liabilities for future policy benefits, IBNR, and evaluated the Liability Adequacy Testing ("LAT").*
- *We performed recalculation, on a sample basis, of the unearned premium reserves using the daily amortisation method.*

- Kami menguji kelengkapan data yang digunakan dalam perhitungan atas liabilitas kepada pemegang polis dengan melakukan rekonsiliasi antara data produksi dan laporan aktuaria manajemen menggunakan *Computer Assisted Audit Technique ("CAATs")*, dengan bantuan spesialis TI kami. Kami juga menguji akurasi data yang digunakan, berdasarkan uji petik, dengan memeriksa dokumen-dokumen pendukung, seperti dokumen polis dan klaim.

- *We tested on the completeness of the data used for the calculation of the liabilities to policyholders by performing reconciliation between production data and management's actuarial reports using Computer Assisted Audit Technique ("CAATs"), with assistance from our IT specialists. We also tested the accuracy of the data, on a sample basis, by inspecting supporting documents, such as policy and claim documents.*

3. **Sistem dan pengendalian Teknologi Informasi ("TI") yang berdampak pada pelaporan keuangan**

Grup sangat bergantung pada infrastruktur, sistem, dan pengendalian TI untuk mendukung kegiatan operasional sehari-hari dan proses pelaporan keuangan. Lingkungan TI Grup dianggap kompleks dengan mempertimbangkan jumlah dan kompleksitas dari sistem utama pelaporan keuangan dan antarmuka sistem. Oleh karena itu, kami menganggap pengoperasian pengendalian teknologi informasi Grup sebagai hal audit utama.

Bagaimana audit kami merespons hal audit utama

Kami melakukan prosedur-prosedur audit berikut untuk merespons hal audit utama ini:

- Kami melibatkan spesialis TI untuk mengevaluasi risiko yang terkait dengan lingkungan TI Grup, sehubungan dengan proses pelaporan keuangan.

- Kami memperoleh pemahaman tentang sistem TI dan pengendalian yang mendukung proses pelaporan keuangan dan menilai efektivitas rancangan, implementasi dan pengoperasian dari pengendalian utama yang dirancang untuk mempertahankan integritas dari sistem utama pelaporan keuangan. Penilaian ini termasuk evaluasi atas:
  i. Pengendalian atas manajemen perubahan: Proses dan pengendalian yang dijalankan untuk mengembangkan, menguji dan mengesahkan perubahan pada fungsi dan konfigurasi di dalam sistem;

  ii. Pengendalian atas keamanan akses: Pengendalian akses pengguna dirancang untuk melaksanakan pemisahan tugas, mengatur penggunaan akun umum dan akses istimewa atau proses otorisasi atas perubahan data;

3. ***Information Technology ("IT") systems and controls that impact financial reporting***

The Group is heavily reliant on its IT infrastructure, systems and controls for its daily operations and financial reporting processes. The IT environment of the Group is considered to be complex due to the number and complexity of the key financial reporting systems and their system interfaces. Therefore, we consider the operation of the Group's information technology controls to be a key audit matter.

How our audit addressed the key audit matter

We performed the following audit procedures to address this key audit matter:

- *We involved IT specialists in evaluating the risks associated with the Group's IT environment in respect of its financial reporting processes.*

- *We understood the IT systems and controls that support the financial reporting process and assessed the effectiveness of the design, implementation and operation of the associated key controls designed to maintain the integrity of the key financial reporting systems. This assessment included evaluating:*

  i. Change management controls: The processes and controls to develop, test and authorise changes to the functionality and configurations within systems;

  ii. Access security controls: The access controls designed to enforce segregation of duties, govern the use of generic and high privileged accounts or the authorisation process to change the data;

iii. Pengendalian atas operasional TI: Pengendalian atas operasional dilaksanakan untuk mengelola risiko keuangan yang mungkin akan terjadi dari setiap masalah operasional TI; dan

iv. Pengendalian pengembangan sistem: Pengendalian atas pengembangan, konfigurasi dan implementasi dari sistem baru atau yang sudah ada.

- Kami menguji pengendalian TI Grup atas sistem yang relevan dengan audit kami dan pengendalian utama yang bergantung pada TI yang mendukung proses pelaporan keuangan, seperti penghitungan otomatis sistem, pemrosesan transaksi, pembuatan laporan dan perpindahan data antar sistem. Pengujian kami mencakup pemeriksaan konfigurasi sistem yang relevan dan pengujian keluaran sistem, berdasarkan uji petik.

iii. IT operation related controls: The controls over operations to manage the financial risks that may arise from any IT operation issues; and

iv. System development controls: The controls associated with developing, configuring, and implementing new or existing systems.

- *We tested the Group's IT controls over systems that were relevant to our audit and the key IT dependent controls supporting the financial reporting process, such as the automated system calculations, transaction processing, generation of reports and data interfaces between systems. Our testing included the inspection of relevant system configurations and testing system outputs, on a sample basis.*

Informasi lain

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam laporan tahunan, tetapi tidak termasuk laporan keuangan konsolidasian dan laporan auditor kami. Laporan tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor ini.

Opini kami atas laporan keuangan konsolidasian tidak mencakup informasi lain, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas informasi lain tersebut.

Sehubungan dengan audit kami atas laporan keuangan konsolidasian, tanggung jawab kami adalah untuk membaca informasi lain yang teridentifikasi di atas, jika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah informasi lain mengandung ketidakkonsistensian material dengan laporan keuangan konsolidasian atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

Ketika kami membaca laporan tahunan, jika kami menyimpulkan bahwa terdapat suatu kesalahan penyajian material di dalamnya, kami diharuskan untuk mengomunikasikan hal tersebut kepada pihak yang bertanggung jawab atas tata kelola dan mengambil tindakan tepat berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia.

Other information

Management is responsible for the other information. The other information comprises the information included in the annual report but does not include the consolidated financial statements and our auditors' report thereon. The annual report is expected to be made available to us after the date of this auditors' report.

Our opinion on the consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

When we read the annual report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance and take appropriate actions in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants.

Tanggung Jawab Manajemen dan Pihak yang Bertanggung Jawab atas Tata Kelola terhadap Laporan Keuangan Konsolidasian

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan konsolidasian tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan konsolidasian yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Dalam penyusunan laporan keuangan konsolidasian, manajemen bertanggung jawab untuk menilai kemampuan Grup dalam mempertahankan kelangsungan usahanya, mengungkapkan, sesuai dengan kondisinya, hal-hal yang berkaitan dengan kelangsungan usaha, dan menggunakan basis akuntansi kelangsungan usaha, kecuali manajemen memiliki intensi untuk melikuidasi Grup atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Grup.

Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

Tanggung jawab auditor terhadap audit atas laporan keuangan konsolidasian

Tujuan kami adalah untuk memperoleh keyakinan memadai tentang apakah laporan keuangan konsolidasian secara keseluruhan bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan, dan untuk menerbitkan laporan auditor yang mencakup opini kami. Keyakinan memadai merupakan suatu tingkat keyakinan tinggi, namun bukan merupakan suatu jaminan bahwa audit yang dilaksanakan berdasarkan Standar Audit akan selalu mendeteksi kesalahan penyajian material ketika hal tersebut ada. Kesalahan penyajian dapat disebabkan oleh kecurangan maupun kesalahan dan dianggap material jika, baik secara individual maupun secara agregat, dapat diekspektasikan secara wajar akan memengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan konsolidasian tersebut.

Auditors' responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

Sebagai bagian dari suatu audit berdasarkan Standar Audit, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga:

- Mengidentifikasi dan menilai risiko kesalahan penyajian material dalam laporan keuangan konsolidasian, baik yang disebabkan oleh kecurangan maupun kesalahan, mendesain dan melaksanakan prosedur audit yang responsif terhadap risiko tersebut, serta memperoleh bukti audit yang cukup dan tepat untuk menyediakan basis bagi opini kami. Risiko tidak terdeteksinya kesalahan penyajian material yang disebabkan oleh kecurangan lebih tinggi dari yang disebabkan oleh kesalahan, karena kecurangan dapat melibatkan kolusi, pemalsuan, penghilangan secara sengaja, pernyataan salah, atau pengabaian pengendalian internal.
- Memperoleh suatu pemahaman tentang pengendalian internal yang relevan dengan audit untuk mendesain prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal Grup.
- Mengevaluasi ketepatan kebijakan akuntansi yang digunakan serta kewajaran estimasi akuntansi dan pengungkapan terkait yang dibuat oleh manajemen.
- Menyimpulkan ketepatan penggunaan basis akuntansi kelangsungan usaha oleh manajemen dan, berdasarkan bukti audit yang diperoleh, apakah terdapat suatu ketidakpastian material yang terkait dengan peristiwa atau kondisi yang dapat menyebabkan keraguan signifikan atas kemampuan Grup untuk mempertahankan kelangsungan usahanya. Ketika kami menyimpulkan bahwa terdapat suatu ketidakpastian material, kami diharuskan untuk menarik perhatian dalam laporan auditor kami ke pengungkapan terkait dalam laporan keuangan konsolidasian atau, jika pengungkapan tersebut tidak memadai, harus menentukan apakah perlu untuk memodifikasi opini kami. Kesimpulan kami didasarkan pada bukti audit yang diperoleh hingga tanggal laporan auditor kami. Namun, peristiwa atau kondisi masa depan dapat menyebabkan Grup tidak dapat mempertahankan kelangsungan usaha.
- Mengevaluasi penyajian, struktur, dan isi laporan keuangan konsolidasian secara keseluruhan, termasuk pengungkapannya, dan apakah laporan keuangan konsolidasian mencerminkan transaksi dan peristiwa yang mendasarinya dengan suatu cara yang mencapai penyajian wajar.

As part of an audit in accordance with Standards on Auditing, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- *Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.*
- *Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.*
- *Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.*
- *Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group to cease to continue as a going concern.*
- *Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.*

- Memperoleh bukti audit yang cukup dan tepat terkait informasi keuangan entitas atau aktivitas bisnis dalam Grup untuk menyatakan opini atas laporan keuangan konsolidasian. Kami bertanggung jawab atas arahan, supervisi dan pelaksanaan audit grup. Kami tetap bertanggung jawab sepenuhnya atas opini audit kami.

- *Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.*

Kami mengomunikasikan kepada pihak yang bertanggung jawab atas tata kelola mengenai, antara lain, ruang lingkup dan saat yang direncanakan atas audit serta temuan audit signifikan, termasuk setiap defisiensi signifikan dalam pengendalian internal yang teridentifikasi oleh kami selama audit.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Kami juga memberikan suatu pernyataan kepada pihak yang bertanggung jawab atas tata kelola bahwa kami telah mematuhi ketentuan etika yang relevan mengenai independensi, dan mengomunikasikan seluruh hubungan serta hal-hal lain yang dianggap secara wajar berpengaruh terhadap independensi kami, dan jika relevan, pengamanan terkait.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

Dari hal-hal yang dikomunikasikan kepada pihak yang bertanggung jawab atas tata kelola, kami menentukan hal-hal tersebut yang paling signifikan dalam audit atas laporan keuangan konsolidasian periode kini dan oleh karenanya menjadi hal audit utama. Kami menguraikan hal audit utama dalam laporan auditor kami kecuali peraturan perundang-undangan melarang pengungkapan publik tentang hal tersebut atau ketika, dalam kondisi yang sangat jarang terjadi, kami menentukan bahwa suatu hal tidak boleh dikomunikasikan dalam laporan kami karena konsekuensi merugikan dari mengomunikasikan hal tersebut akan diekspektasikan secara wajar melebihi manfaat kepentingan publik atas komunikasi tersebut.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

JAKARTA,
22 Januari/*January* 2025

Jimmy Pangestu, S.E., CPA
Izin Akuntan Publik/*Public Accountant License* No. AP.1124

Bank Negara Indonesia (Persero) Tbk
00014/2.1457/AU.1/07/1124-1/1/I/2025

PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN KEUANGAN KONSOLIDASIAN
31 DESEMBER 2024 DAN 2023
DAN UNTUK TAHUN-TAHUN YANG BERAKHIR PADA
31 DESEMBER 2024 DAN 2023

CONSOLIDATED FINANCIAL STATEMENTS
31 DECEMBER 2024 AND 2023
AND FOR THE YEARS THEN ENDED
31 DECEMBER 2024 AND 2023

Daftar Isi

	Halaman/ *Page*	***Table of Contents***
Laporan Posisi Keuangan Konsolidasian	1 - 4	*Consolidated Statements of Financial Position*
Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian	5 - 7	*Consolidated Statements of Profit or Loss and Other Comprehensive Income*
Laporan Perubahan Ekuitas Konsolidasian	8 - 9	*Consolidated Statements of Changes in Equity*
Laporan Arus Kas Konsolidasian	10 - 12	*Consolidated Statements of Cash Flows*
Catatan atas Laporan Keuangan Konsolidasian	13 - 299	*Notes to the Consolidated Financial Statements*
	Lampiran/ *Schedule*	
Informasi Keuangan Tambahan	1 - 5	*Supplementary Financial Information*

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LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
ASET				***ASSETS***
Kas	4	13,709,930	11,207,201	*Cash*
Giro pada Bank Indonesia	5	51,669,054	65,256,432	*Current accounts with Bank Indonesia*
Giro pada bank lain	6,45b			*Current accounts with other banks*
- Pihak berelasi		42,974	52,254	*Related parties* -
- Pihak ketiga		22,031,212	34,970,515	*Third parties* -
Total giro pada bank lain		22,074,186	35,022,769	*Total current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai		(13)	(7)	*Less: Allowance for impairment losses*
		22,074,173	35,022,762	
Penempatan pada bank lain dan Bank Indonesia	7,45c			*Placements with other banks and Bank Indonesia*
- Pihak berelasi		1,620,191	1,210,621	*Related parties* -
- Pihak ketiga		15,455,444	42,583,643	*Third parties* -
Total penempatan pada bank lain dan Bank Indonesia		17,075,635	43,794,264	*Total placements with other banks and Bank Indonesia*
Dikurangi: Cadangan kerugian penurunan nilai		(194)	(98)	*Less: Allowance for impairment losses*
		17,075,441	43,794,166	
Efek-efek	8,45d			*Marketable securities*
- Pihak berelasi		10,157,415	11,427,357	*Related parties* -
- Pihak ketiga		38,376,931	25,980,323	*Third parties* -
Total efek-efek		48,534,346	37,407,680	*Total marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai		(273)	(242,941)	*Less: Allowance for impairment losses*
		48,534,073	37,164,739	
Efek-efek yang dibeli dengan janji dijual kembali	14	7,971,923	13,951,344	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	9,45f			*Bills and other receivables*
- Pihak berelasi		6,208,736	10,085,240	*Related parties* -
- Pihak ketiga		7,087,118	9,192,255	*Third parties* -
Total wesel ekspor dan tagihan lainnya		13,295,854	19,277,495	*Total bills and other receivables*
Dikurangi: Cadangan kerugian penurunan nilai		(52,828)	(278,501)	*Less: Allowance for impairment losses*
		13,243,026	18,998,994	

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
ASET (lanjutan)				***ASSETS** (continued)*
Tagihan akseptasi	10,45g			*Acceptance receivables*
- Pihak berelasi		2,825,260	3,158,955	*Related parties -*
- Pihak ketiga		13,193,510	14,409,720	*Third parties -*
Total tagihan akseptasi		16,018,770	17,568,675	*Total acceptance receivables*
Dikurangi: Cadangan kerugian penurunan nilai		(93,249)	(477,481)	*Less: Allowance for impairment losses*
		15,925,521	17,091,194	
Tagihan derivatif	11,45h			*Derivative receivables*
- Pihak berelasi		341,832	37,939	*Related parties -*
- Pihak ketiga		1,451,146	957,738	*Third parties -*
Total tagihan derivatif		1,792,978	995,677	*Total derivative receivables*
Pinjaman yang diberikan	12,45i			*Loans*
- Pihak berelasi		159,402,689	126,359,320	*Related parties -*
- Pihak ketiga		616,469,089	568,725,449	*Third parties -*
Total pinjaman yang diberikan		775,871,778	695,084,769	*Total loans*
Dikurangi: Cadangan kerugian penurunan nilai		(38,684,520)	(47,158,131)	*Less: Allowance for impairment losses*
		737,187,258	647,926,638	
Obligasi Pemerintah setelah penyesuaian amortisasi diskonto dan premi	13,45e	132,071,569	127,100,369	*Government Bonds adjusted for amortization of discount and premium*
Dikurangi: Cadangan kerugian penurunan nilai		(2,988)	(1,504)	*Less: Allowance for impairment losses*
		132,068,581	127,098,865	
Pajak dibayar di muka	29a	18,950	643,384	*Prepaid taxes*
Beban dibayar di muka	15	2,941,109	2,743,330	*Prepaid expenses*
Investasi pada entitas asosiasi	16,45j	12,748,127	11,283,466	*Investment in associates*
Penyertaan saham - bersih	17,45j	637,280	563,700	*Equity investments - net*
Aset lain-lain - bersih	18	14,107,067	16,972,197	*Other assets - net*
Aset tetap dan aset hak-guna	19	48,815,943	44,687,850	*Fixed assets and right-of-use assets*
Dikurangi: Akumulasi penyusutan		(18,407,707)	(16,922,994)	*Less: Accumulated depreciation*
		30,408,236	27,764,856	
Aset takberwujud	20	743,314	744,423	*Intangible assets*
Aset pajak tangguhan - bersih	29d	6,949,596	7,440,618	*Deferred tax assets - net*
TOTAL ASET		**1,129,805,637**	**1,086,663,986**	***TOTAL ASSETS***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
LIABILITAS DAN EKUITAS				***LIABILITIES AND EQUITY***
LIABILITAS				***LIABILITIES***
Liabilitas segera	21	5,514,720	5,294,952	*Obligations due immediately*
Simpanan nasabah	22,45k			*Deposits from customers*
- Pihak berelasi		112,833,811	152,080,390	*Related parties -*
- Pihak ketiga		692,677,037	658,649,953	*Third parties -*
Total simpanan nasabah		805,510,848	810,730,343	*Total deposits from customers*
Simpanan dari bank lain	23,45l			*Deposits from other banks*
- Pihak berelasi		4,164,697	2,705,107	*Related parties -*
- Pihak ketiga		14,383,767	9,188,881	*Third parties -*
Total simpanan dari bank lain		18,548,464	11,893,988	*Total deposits from other banks*
Liabilitas derivatif	11,45p			*Derivative payables*
- Pihak berelasi		154,840	136,138	*Related parties -*
- Pihak ketiga		1,324,345	674,324	*Third parties -*
Total liabilitas derivatif		1,479,185	810,462	*Total derivative payables*
Efek-efek yang dijual dengan janji dibeli kembali	24	15,890,945	6,891,177	*Securities sold under agreements to repurchase*
Liabilitas akseptasi	25,45q			*Acceptance payables*
- Pihak berelasi		900,755	1,070,600	*Related parties -*
- Pihak ketiga		3,328,729	4,677,947	*Third parties -*
Total liabilitas akseptasi		4,229,484	5,748,547	*Total acceptance payables*
Beban yang masih harus dibayar	26	1,529,305	1,663,865	*Accrued expenses*
Utang pajak	29b			*Taxes payable*
- Pajak penghasilan badan		223,208	701,920	*Corporate income tax -*
- Pajak lainnya		94,361	121,053	*Other taxes -*
Total utang pajak		317,569	822,973	*Total taxes payable*
Imbalan kerja	41	7,146,717	7,005,834	*Employee benefits*
Penyisihan	27	2,283,222	2,172,732	*Provisions*
Liabilitas lain-lain	28	26,563,501	26,124,897	*Other liabilities*
Efek-efek yang diterbitkan	30,45m	12,974,497	4,893,357	*Securities issued*
Pinjaman yang diterima	31,45n	42,931,444	30,949,608	*Borrowings*
Efek-efek subordinasi	32,45o	17,699,183	16,928,731	*Subordinated securities*
TOTAL LIABILITAS		**962,619,084**	**931,931,466**	***TOTAL LIABILITIES***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
EKUITAS				***EQUITY***
Ekuitas diatribusikan kepada pemilik entitas induk				*Equity attributable to equity holders of the parent entity*
Modal saham:				*Share capital:*
- Seri A Dwiwarna - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)				*Class A Dwiwarna - Rp3,750 par value per share (in full Rupiah amount)*
- Seri B - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)				*Class B - Rp3,750 par value per share (in full Rupiah amount)*
- Seri C - nilai nominal Rp187,5 per saham (dalam Rupiah penuh)				*Class C - Rp187.5 par value per share (in full Rupiah amount)*
Modal dasar:				*Share capital - Authorised:*
- Seri A Dwiwarna - 1 saham				*Class A Dwiwarna - 1 share*
- Seri B - 578.683.733 saham				*Class B - 578,683,733 shares*
- Seri C - 68.426.325.320 saham				*Class C - 68,426,325,320 shares*
Modal ditempatkan dan disetor penuh:				*Issued and fully paid:*
- Seri A Dwiwarna - 1 saham				*Class A Dwiwarna - 1 share*
- Seri B - 578.683.733 saham				*Class B - 578,683,733 shares*
- Seri C - 36.678.114.582 saham	33	9,054,807	9,054,807	*Class C -36,678,114,582 shares*
Tambahan modal disetor	33	17,010,254	17,010,254	*Additional paid-in capital*
Cadangan pembayaran berbasis saham	43	322,589	260,116	*Share-based payment reserve*
Transaksi dengan kepentingan nonpengendali	1j	2,256,999	2,256,999	*Transactions with non-controlling interests*
Cadangan revaluasi aset	19	16,711,395	15,447,829	*Asset revaluation reserve*
Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	8,13	(1,465,059)	(896,178)	*Unrealised loss on marketable securities and Government Bonds at fair value through other comprehensive income, net of tax*
Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing		(96,998)	(58,367)	*Exchange difference on translation of foreign currency financial statements*
Saldo laba				*Retained earnings*
Sudah ditentukan penggunaannya				*Appropriated*
Cadangan umum dan wajib	35	2,778,412	2,778,412	*General and legal reserves*
Cadangan khusus		-	-	*Specific reserves*
Tidak ditentukan penggunaannya		115,885,182	104,457,102	*Unappropriated*
Total saldo laba		118,663,594	107,235,514	*Total retained earnings*
Saham treasuri		-	(179,960)	*Treasury shares*
Total ekuitas yang dapat diatribusikan kepada pemilik entitas induk		**162,457,581**	**150,131,014**	***Total equity attributable to equity holders of the parent entity***
Kepentingan non-pengendali		**4,728,972**	**4,601,506**	***Non-controlling interests***
TOTAL EKUITAS		**167,186,553**	**154,732,520**	***TOTAL EQUITY***
TOTAL LIABILITAS DAN EKUITAS		**1,129,805,637**	**1,086,663,986**	***TOTAL LIABILITIES AND EQUITY***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
PENDAPATAN BUNGA	37	66,583,110	61,471,696	***INTEREST INCOME***
BEBAN BUNGA	38	(26,102,905)	(20,196,023)	***INTEREST EXPENSE***
PENDAPATAN BUNGA - BERSIH		**40,480,205**	**41,275,673**	***INTEREST INCOME - NET***
Pendapatan premi dan hasil investasi		6,741,317	6,853,074	*Premium income and investment return*
Beban klaim		(5,017,507)	(5,193,773)	*Claims expense*
PENDAPATAN PREMI DAN HASIL INVESTASI - BERSIH		**1,723,810**	**1,659,301**	***PREMIUM INCOME AND INVESTMENTS RETURN - NET***
PENDAPATAN OPERASIONAL LAINNYA				***OTHER OPERATING INCOME***
Provisi dan komisi lainnya		10,249,243	10,120,172	*Other fee and commission*
Laba dari entitas asosiasi		1,522,798	1,327,868	*Income from investment in associates*
Penerimaan kembali aset yang telah dihapusbukukan		6,025,183	5,029,766	*Recovery of assets written off*
Keuntungan yang belum direalisasi dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui laba rugi		144,558	73,552	*Unrealised gain on changes in fair value of financial assets at fair value through profit or loss*
Keuntungan dari penjualan aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan nilai wajar melalui laba rugi		1,769,243	1,179,693	*Gain on sale of financial assets at fair value through other comprehensive income and fair value through profit or loss*
Laba selisih kurs - bersih		1,262,002	1,019,050	*Foreign exchange gains - net*
Lain-lain		1,337,878	1,062,328	*Others*
TOTAL PENDAPATAN OPERASIONAL LAINNYA		**22,310,905**	**19,812,429**	***TOTAL OTHER OPERATING INCOME***
PEMBENTUKAN CADANGAN KERUGIAN PENURUNAN NILAI		**(8,210,562)**	**(9,196,402)**	***ALLOWANCE FOR IMPAIRMENT LOSSES***
BEBAN OPERASIONAL LAINNYA				***OTHER OPERATING EXPENSES***
Gaji dan tunjangan	39,45u	(13,948,131)	(12,833,769)	*Salaries and employees' benefits*
Umum dan administrasi	40	(9,184,590)	(9,193,199)	*General and administrative*
Premi penjaminan simpanan		(1,567,476)	(1,476,244)	*Deposit guarantee premium*
Beban promosi		(1,135,800)	(1,066,423)	*Promotion expense*
Lain-lain		(3,852,448)	(3,208,030)	*Others*
TOTAL BEBAN OPERASIONAL LAINNYA		**(29,688,445)**	**(27,777,665)**	***TOTAL OTHER OPERATING EXPENSES***
LABA OPERASIONAL		**26,615,913**	**25,773,336**	***OPERATING INCOME***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
PENDAPATAN/(BEBAN) BUKAN OPERASIONAL - BERSIH		**(35,455)**	**(133,598)**	***NON-OPERATING INCOME/(EXPENSE) - NET***
LABA SEBELUM BEBAN PAJAK		**26,580,458**	**25,639,738**	***INCOME BEFORE TAX EXPENSES***
BEBAN PAJAK				***TAX EXPENSES***
Kini		(4,495,531)	(4,462,052)	*Current*
Tangguhan		(415,530)	(71,458)	*Deferred*
TOTAL BEBAN PAJAK	29c	(4,911,061)	(4,533,510)	***TOTAL TAX EXPENSES***
LABA BERSIH		**21,669,397**	**21,106,228**	***NET INCOME***
PENGHASILAN KOMPREHENSIF LAIN:				***OTHER COMPREHENSIVE INCOME:***
Pos-pos yang tidak akan direklasifikasi ke laba rugi				***Items that will not be reclassified to profit or loss***
Keuntungan yang berasal dari revaluasi aset tetap		1,375,650	9,998	*Gain from revaluation of fixed assets*
Pengukuran kembali liabilitas imbalan kerja		523,563	(505,219)	*Remeasurement of post employment benefit*
Pajak penghasilan terkait		(211,740)	96,005	*Related income tax*
Pos-pos yang akan direklasifikasi ke laba rugi				***Items that will be reclassified to profit or loss***
Penyesuaian akibat penjabaran laporan keuangan dalam mata uang asing		(38,631)	(21,997)	*Translation adjustment of foreign currency financial statements*
(Kerugian)/keuntungan dari perubahan nilai aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain		(813,581)	1,444,294	*(Loss)/gain on changes in value of financial assets at fair value through other comprehensive income*
Pajak penghasilan terkait		161,680	(349,786)	*Related income tax*
LABA KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK		**996,941**	**673,295**	***OTHER COMPREHENSIVE INCOME FOR THE YEAR AFTER TAXES***
TOTAL LABA KOMPREHENSIF TAHUN BERJALAN		**22,666,338**	**21,779,523**	***TOTAL COMPREHENSIVE INCOME FOR THE YEAR***
LABA TAHUN BERJALAN DIATRIBUSIKAN KEPADA:				***INCOME FOR THE YEAR ATTRIBUTABLE TO:***
Pemilik entitas induk		21,463,599	20,909,476	*Equity holders of the parent entity*
Kepentingan non-pengendali		205,798	196,752	*Non-controlling interest*
TOTAL		**21,669,397**	**21,106,228**	***TOTAL***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
LABA KOMPREHENSIF PERIODE BERJALAN DIATRIBUSIKAN KEPADA:				***TOTAL COMPREHENSIVE INCOME FOR THE PERIOD ATTRIBUTABLE TO:***
Pemilik entitas induk		22,538,872	21,559,964	*Equity holders of the parent entity*
Kepentingan nonpengendali		127,466	219,559	*Non-controlling interest*
TOTAL		**22,666,338**	**21,779,523**	***TOTAL***
LABA PER SAHAM DASAR/DILUSIAN DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK (DALAM RUPIAH PENUH)	42	**576**	**561**	***BASIC/DILUTED EARNINGS PER SHARE ATTRIBUTABLE TO EQUITY HOLDERS OF THE PARENT ENTITY (IN FULL RUPIAH AMOUNT)***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Transaksi dengan kepentingan nonpengendali/ *Transactions with non-controlling interest*	Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealised losses on marketable securities and Government Bonds at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference on translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan pembayaran berbasis saham/ *Share-based payment reserve*	Total ekuitas pemilik entitas induk/*Total equity owners of parent*	Kepentingan nonpengendali/ *Non-controlling interest*	Total ekuitas/ *Total equity*	
								Dicadangkan/ *Appropriated*							
								Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated**)						
Saldo pada tanggal 31 Desember 2023		**9,054,807**	**17,010,254**	**2,256,999**	**(896,178)**	**(58,367)**	**15,447,829**	**2,778,412**	**104,457,102**	**(179,960)**	**260,116**	**150,131,014**	**4,601,506**	**154,732,520**	***Balance as of 31 December 2023***
Laba tahun berjalan		-	-	-	-	-	-	-	21,882,818	-	-	21,882,818	205,798	22,088,616	*Profit for the year*
Laba komprehensif lainnya untuk tahun berjalan	8,13	-	-	-	(568,881)	(38,631)	1,263,566	-	-	-	-	656,054	(78,332)	577,722	*Other comprehensive income for the year*
Pembagian dividen	34	-	-	-	-	-	-	-	(10,454,738)	-	-	(10,454,738)	-	(10,454,738)	*Distribution of dividends*
Saham treasuri		-	-	-	-	-	-	-	-	179,960	-	179,960	-	179,960	*Treasury shares*
Penambahan cadangan pembayaran berbasis saham	43	-	-	-	-	-	-	-	-	-	62,473	62,473	-	62,473	*Additional of share-based payment reserve*
Saldo pada tanggal 31 Desember 2024		**9,054,807**	**17,010,254**	**2,256,999**	**(1,465,059)**	**(96,998)**	**16,711,395**	**2,778,412**	**115,885,182**	**-**	**322,589**	**162,457,581**	**4,728,972**	**167,186,553**	***Balance as of 31 December 2024***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

**) Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Transaksi dengan kepentingan nonpengendali/ *Transactions with non-controlling interest*	Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealized losses on marketable securities and Government Bonds at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference on translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan pembayaran berbasis saham/ *Share-based payment reserve*	Total ekuitas pemilik entitas induk/*Total equity owners of parent*	Kepentingan nonpengendali/ *Non-controlling interest*	Total ekuitas/ *Total equity*	
								Dicadangkan/ *Appropriated*							
								Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated*)*						
Saldo pada tanggal 31 Desember 2022		**9,054,807**	**17,010,254**	**2,256,999**	**(1,971,154)**	**(36,370)**	**15,441,439**	**2,778,412**	**91,281,328**	**-**	**-**	**135,815,715**	**4,381,947**	**140,197,662**	***Balance as of 31 December 2022***
Laba tahun berjalan	-	-	-	-	-	-	-	-	20,500,595	-	-	20,500,595	196,752	20,697,347	*Profit for the year*
Laba komprehensif lainnya untuk tahun berjalan	8,13	-	-	-	1,074,976	(21,997)	6,390	-	-	-	-	1,059,369	22,807	1,082,176	*Other comprehensive income for the year*
Pembagian dividen	34	-	-	-	-	-	-	-	(7,324,821)	-	-	(7,324,821)	-	(7,324,821)	*Distribution of dividends*
Saham treasuri	33	-	-	-	-	-	-	-	-	(179,960)	-	(179,960)	-	(179,960)	*Treasury shares*
Penambahan cadangan pembayaran berbasis saham	43	-	-	-	-	-	-	-	-	-	260,116	260,116	-	260,116	*Additional of share-based payment reserve*
Saldo pada tanggal 31 Desember 2023		**9,054,807**	**17,010,254**	**2,256,999**	**(896,178)**	**(58,367)**	**15,447,829**	**2,778,412**	**104,457,102**	**(179,960)**	**260,116**	**150,131,014**	**4,601,506**	**154,732,520**	***Balance as of 31 December 2023***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

**) Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan pendapatan bunga		66,149,661	60,989,587	*Receipts from interest income*
Pembayaran beban bunga		(26,031,790)	(19,944,410)	*Payments of interest expense*
Pendapatan premi dan hasil investasi		6,876,597	6,853,074	*Premium and investment income*
Beban klaim		(5,017,507)	(5,193,773)	*Claims expense*
Pendapatan operasional lainnya		26,436,787	16,949,163	*Other operating income*
Beban operasional lainnya		(28,632,962)	(23,283,035)	*Other operating expenses*
Pendapatan (beban) bukan operasional - bersih		(35,455)	(133,598)	*Non-operating income (expenses) - net*
Pembayaran pajak penghasilan		(4,349,809)	(5,151,648)	*Payment of income tax*
Arus kas sebelum perubahan dalam aset dan liabilitas operasi		**35,395,522**	**31,085,360**	***Cash flows before changes in operating assets and liabilities***
Perubahan dalam aset dan liabilitas operasi:				***Changes in operating assets and liabilities:***
(Kenaikan)/penurunan aset operasi:				*(Increase)/decrease in operating assets:*
Penempatan pada Bank Indonesia dan bank lain		(52,468)	(440,595)	*Placements with Bank Indonesia and other banks*
Efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui laba rugi		(14,115,494)	(5,027,231)	*Marketable securities and Government Bonds at fair value through profit or loss*
Efek-efek yang dibeli dengan janji dijual kembali	14	5,979,421	2,679,927	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya		5,981,641	1,624,634	*Bills and other receivables*
Pinjaman yang diberikan		(99,510,845)	(63,286,794)	*Loans*
Tagihan akseptasi		1,549,905	2,445,553	*Acceptance receivables*
Beban dibayar di muka	15	(197,779)	500,290	*Prepaid expenses*
Penempatan *term deposit* valas devisa hasil ekspor		1,631,137	(2,540,505)	*Foreign exchange term deposit from export activities*
Aset lain-lain		1,667,443	(93,469)	*Other assets*
(Penurunan)/kenaikan liabilitas operasi:				*(Decrease)/increase in operating liabilities:*
Liabilitas segera	21	219,768	608,592	*Obligations due immediately*
Simpanan nasabah	22	(5,219,495)	41,461,352	*Deposits from customers*
Simpanan dari bank lain	23	6,654,476	(3,350,566)	*Deposits from other banks*
Kewajiban atas penempatan *term deposit* valas devisa hasil ekspor		(1,631,137)	2,540,505	*Liabilities related to foreign exchange term deposit from export activities*
Beban yang masih harus dibayar	26	(134,560)	223,195	*Accrued expenses*
Imbalan kerja	41	(507,803)	701,494	*Employee benefits*
Liabilitas akseptasi	25	(1,519,063)	447,304	*Acceptance payables*
Utang pajak		(26,693)	(38,297)	*Taxes payable*
Liabilitas lain-lain	28	618,111	852,115	*Other liabilities*
Kas bersih (digunakan untuk)/ diperoleh dari aktivitas operasi		**(63,217,913)**	**10,392,864**	***Net cash (used in)/provided from operating activities***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
ARUS KAS DARI AKTIVITAS INVESTASI				***CASH FLOWS FROM INVESTING ACTIVITIES***
Penjualan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		192,702,098	55,841,139	*Proceed from marketable securities measured at fair value through other comprehensive income and amortised cost*
Pembelian efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		(193,676,092)	(58,100,935)	*Placement from marketable securities measured at fair value through other comprehensive income and amortised cost*
Penjualan dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		133,707,136	55,658,940	*Proceed of Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		(134,923,291)	(61,028,460)	*Placement of Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian aset tetap	19	(3,106,669)	(2,355,060)	*Acquisition of fixed assets*
Hasil penjualan aset tetap		26,713	13,119	*Proceeds from sale of fixed assets*
Penyertaan pada Entitas anak		-	(800,000)	*Capital injection in Subsidiary*
Kas bersih digunakan untuk aktivitas investasi		**(5,270,105)**	**(10,771,257)**	***Net cash used in investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerimaan pinjaman yang diterima		29,009,391	15,899,532	*Receipt from borrowings*
Pembayaran pinjaman yang diterima		(16,584,455)	(20,658,021)	*Payment for borrowings*
Penerimaan efek-efek yang dijual dengan janji dibeli kembali	24	9,351,740	6,382,251	*Receipt in securities sold under agreements to repurchase*
Pembayaran efek-efek yang dijual dengan janji dibeli kembali	24	(920,846)	(2,370,705)	*Payment for securities sold under agreements to repurchase*
Penerimaan efek-efek yang diterbitkan		8,187,500	-	*Receipt in securities issued*
Saham tresuri		-	(179,960)	*Treasury shares*
Pembayaran liabilitas sewa		(870,149)	(240,769)	*Payment of lease liability*
Pembayaran dividen		(10,454,738)	(7,324,821)	*Payment of dividends*
Kas bersih diperoleh dari/ (digunakan untuk) aktivitas pendanaan		**17,718,443**	**(8,492,493)**	***Net cash provided from/ (used in) financing activities***
PENURUNAN BERSIH KAS DAN SETARA KAS		**(50,769,575)**	**(8,870,886)**	***NET DECREASE IN CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN		**154,879,093**	**163,900,321**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF THE YEAR***
Pengaruh perubahan kurs mata uang asing		(34,754)	(150,342)	*Effect of foreign currency exchange rate changes*
KAS DAN SETARA KAS PADA AKHIR TAHUN		**104,074,764**	**154,879,093**	***CASH AND CASH EQUIVALENTS AT THE END OF THE YEAR***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2024	2023	
KAS DAN SETARA KAS TERDIRI DARI:				***CASH AND CASH EQUIVALENTS CONSIST OF:***
Kas	4	13,709,930	11,207,201	*Cash*
Giro pada Bank Indonesia	5	51,669,054	65,256,432	*Current accounts with Bank Indonesia*
Giro pada bank lain	6	22,074,186	35,022,769	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan		16,621,594	43,392,691	*Placements with Bank Indonesia and other banks - maturing within three months of acquisition date*
Total kas dan setara kas		**104,074,764**	**154,879,093**	***Total cash and cash equivalents***

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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1. INFORMASI UMUM

a. Pendirian Bank

PT Bank Negara Indonesia (Persero) Tbk ("BNI" atau "Bank") pada awalnya didirikan di Indonesia sebagai bank sentral dengan nama "Bank Negara Indonesia" berdasarkan Peraturan Pemerintah Pengganti Undang-Undang No. 2 tahun 1946 tanggal 5 Juli 1946. Selanjutnya, berdasarkan Undang-Undang No. 17 tahun 1968, BNI ditetapkan menjadi "Bank Negara Indonesia 1946", dan statusnya menjadi Bank Umum Milik Negara.

Berdasarkan Peraturan Pemerintah No. 19 tahun 1992, tanggal 29 April 1992, telah dilakukan penyesuaian bentuk hukum BNI menjadi perusahaan perseroan terbatas (Persero). Penyesuaian bentuk hukum menjadi Persero, dinyatakan dalam Akta No. 131, tanggal 31 Juli 1992, dibuat di hadapan Muhani Salim, S.H., yang telah diumumkan dalam Berita Negara Republik Indonesia No. 73 tanggal 11 December 1992 Tambahan No. 1A.

Untuk memenuhi ketentuan Undang-Undang No. 40 Tahun 2007 tanggal 16 Agustus 2007 tentang Perseroan Terbatas, Anggaran Dasar BNI telah dilakukan penyesuaian. Penyesuaian tersebut dinyatakan dalam Akta No. 46 tanggal 13 Juni 2008 yang dibuat di hadapan Fathiah Helmi, S.H., notaris di Jakarta, berdasarkan keputusan Rapat Umum Pemegang Saham Luar Biasa tanggal 28 Mei 2008 dan telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-AH.01.02-50609 tanggal 12 Agustus 2008 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 103 tanggal 23 Desember 2008 Tambahan No. 29015.

Anggaran Dasar BNI sebagaimana tertuang dalam Akta Pernyataan Keputusan Rapat Umum Pemegang Saham Tahunan No. 5 tanggal 4 Maret 2024 yang dibuat di hadapan Ashoya Ratam, S.H., M.KN. yang telah mendapat Persetujuan Perubahan Anggaran Dasar Perseroan dari Kementerian Hukum dan HAM Republik Indonesia sesuai Surat Keputusan Menteri Hukum dan HAM Republik Indonesia No. AHU-0020672.AH.01.02 tanggal 1 April 2024 serta telah diterima dan dicatat oleh Menteri Hukum dan HAM Republik Indonesia dengan surat No. AHU-AH.01.03-0079037 tanggal 1 April 2024.

1. GENERAL INFORMATION

a. Establishment of the Bank

PT Bank Negara Indonesia (Persero) Tbk ("BNI" or "Bank") was originally established in Indonesia as the central bank under the name "Bank Negara Indonesia" based on Government Regulation in Lieu of Law No. 2 of 1946 dated 5 July 1946. Subsequently, by virtue of Law No. 17 of 1968, BNI became "Bank Negara Indonesia 1946", and changed its status to a state-owned commercial bank.

Based on Government Regulation No. 19 of 1992, dated 29 April 1992, BNI changed its legal status to a limited liability corporation (Persero). The change in legal status to become a limited liability corporation was covered by Notarial Deed No. 131, dated 31 July 1992 of Muhani Salim, S.H., and was published in Supplement No. 1A of the State Gazette No. 73 dated 11 December 1992.

In compliance with the Indonesian Limited Liability Company Law No. 40 Year 2007 dated 16 August 2007, BNI's Articles of Association has been amended. The amendment was covered by Notarial Deed No. 46 dated 13 June 2008 of Fathiah Helmi, S.H., a notary in Jakarta, as approved in the Extraordinary General Shareholders' Meeting on 28 May 2008 and approved by the Minister of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-AH.01.02-50609 dated 12 August 2008 and published in Supplement No. 29015 of the State Gazette No. 103 dated 23 December 2008.

The Articles of Association of BNI as stated in the Deed of Resolution of the Annual General Shareholders' Meeting No. 5 dated 4 March 2024 of Ashoya Ratam, S.H., M.Kn as approved by the Ministry of Laws and Human Rights of the Republic of Indonesia through its letter of the Minister of Laws and Human Rights of the Republic of Indonesia No. AHU-0020672.AH.01.02 dated 1 April 2024, this amendment has also been received and recorded by the Minister of Laws and Human Rights of the Republic of Indonesia under letter No. AHU-AH.01.03-0079037 dated 1 April 2024.

1. INFORMASI UMUM (lanjutan)

a. Pendirian Bank (lanjutan)

Berdasarkan Pasal 3 Anggaran Dasar BNI, ruang lingkup kegiatan BNI adalah melakukan usaha di bidang perbankan umum.

b. Penawaran Umum Perdana Saham

Pada tanggal 28 Oktober 1996, BNI melakukan penawaran umum perdana atas 1.085.032.000 saham Seri B dengan nilai nominal sebesar Rp500 (nilai penuh) setiap saham dan harga penawaran setiap saham sebesar Rp850 (nilai penuh) kepada masyarakat di Indonesia. Saham yang ditawarkan tersebut mulai diperdagangkan di Bursa Efek Jakarta dan Surabaya (sekarang Bursa Efek Indonesia atau BEI) pada tanggal 25 November 1996.

c. Penawaran Umum Saham Terbatas I

Pada tanggal 30 Juni 1999, BNI melakukan Penawaran Umum Terbatas I dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu (HMETD) sebanyak 151.904.480.000 saham Seri C dengan nilai nominal sebesar Rp25 (nilai penuh) setiap saham. Setiap pemegang 1 saham lama berhak membeli 35 saham baru dengan harga Rp347,58 (nilai penuh) setiap saham. Dari penawaran umum ini, BNI meningkatkan modal sahamnya sebanyak 683.916.500 lembar saham Seri C yang diterbitkan kepada masyarakat umum pada tanggal 21 Juli 1999 dan terdaftar di Bursa Efek Jakarta dan Surabaya (sekarang BEI). BNI juga menerbitkan 151.220.563.500 lembar saham Seri C kepada Pemerintah Indonesia pada tanggal 7 April 2000 dan 30 Juni 2000 melalui program rekapitalisasi berdasarkan Peraturan Pemerintah No. 52 tahun 1999.

d. Rekapitalisasi

Pada tanggal 30 Maret 2000, Menteri Keuangan menyetujui rekapitalisasi BNI sebesar Rp61,8 triliun, yang meningkat sebesar Rp9 triliun dibandingkan dengan jumlah yang ditetapkan dalam Peraturan Pemerintah No. 52 tahun 1999. Sehubungan dengan peningkatan rekapitalisasi tersebut, yang telah disetujui melalui Peraturan Pemerintah No. 32 tahun 2000, BNI menerbitkan tambahan saham Seri C sebanyak 44.946.404.500 saham tanpa Hak Memesan Efek Terlebih Dahulu.

***1. GENERAL INFORMATION** (continued)*

***a. Establishment of the Bank** (continued)*

According to Article 3 of BNI's Articles of Association, BNI's scope of activity is to engage in general banking services.

b. Initial Public Offering ("IPO")

On 28 October 1996, BNI undertook an initial public offering of 1,085,032,000 Class B shares with a par value per share of Rp500 (full amount) and offering price per share of Rp850 (full amount) to the public in Indonesia. The shares began trading on the Jakarta and Surabaya Stock Exchanges (currently Indonesia Stock Exchange or IDX) on 25 November 1996.

c. Limited Public Offering I

On 30 June 1999, BNI undertook a Limited Public Offering I ("LPO I") through the issuance of pre-emptive rights of 151,904,480,000 Class C shares with a par value per share of Rp25 (full amount). Each holder of 1 share was entitled to buy 35 new shares for Rp347.58 (full amount) per share. As a result of LPO I, BNI increased its capital by 683,916,500 Class C shares issued to the public on 21 July 1999 and the LPO I listed in the Jakarta and Surabaya Stock Exchanges (currently IDX). On 7 April 2000 and 30 June 2000, BNI also issued 151,220,563,500 Class C shares to the Government of Indonesia through the recapitalization program under the Government Regulation No. 52 year 1999.

d. Recapitalization

On 30 March 2000, the Ministry of Finance approved BNI's recapitalization amounting to Rp61.8 trillion, which was Rp9 trillion higher than the amount stated in the Government Regulation No. 52 year 1999. In connection with the increase in the recapitalization amount, which was approved in the Government Regulation No. 32 year 2000, BNI issued additional 44,946,404,500 Class C shares without pre-emptive rights.

1. INFORMASI UMUM (lanjutan)

d. Rekapitalisasi (lanjutan)

Pada tanggal 20 Juli 2001, modal saham BNI berkurang sebanyak 1.965.701.500 saham Seri C sehubungan dengan pengembalian kelebihan dana rekapitalisasi kepada Pemerintah Indonesia. Pengembalian tersebut telah disetujui oleh pemegang saham dalam Rapat Umum Pemegang Saham Luar Biasa pada tanggal 25 Juni 2001.

e. Kuasi-reorganisasi

Untuk menghilangkan konsekuensi negatif karena dibebani dengan saldo rugi, BNI melakukan kuasi-reorganisasi sesuai keputusan Rapat Umum Pemegang Saham Luar Biasa ("RUPS-LB") tanggal 15 Desember 2003.

Penyesuaian kuasi-reorganisasi yang telah dibukukan pada tanggal 30 Juni 2003 adalah sebagai berikut:

Akumulasi kerugian	(58,905,232)	*Accumulated losses*
Cadangan umum dan wajib	432,952	*General and legal reserve*
Cadangan khusus	382,541	*Specific reserve*
Selisih penilaian kembali aktiva tetap	1,190,598	*Fixed assets revaluation reserve*
Laba yang belum direalisasi atas efek-efek dalam kelompok tersedia untuk dijual	58,660	*Unrealised gain on available for sale securities*
Kenaikan penilaian kembali nilai wajar aktiva bersih	2,472,634	*Revaluation uplift in the fair value of net assets*
Tambahan modal disetor	54,367,847	*Additional paid-in capital*
	-	

Anggaran Dasar BNI telah mengalami perubahan sehubungan dengan perubahan tambahan modal disetor karena adanya kuasi-reorganisasi sesuai dengan Akta Notaris Agung Prihatin, S.H., No. 42 tanggal 30 Desember 2003 dan telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan surat keputusan No. C-29647.HT.01.07.TH.2003 tanggal 19 Desember 2003 dan diumumkan pada Berita Negara Republik Indonesia No. 1152 tanggal 30 Januari 2004, Tambahan No. 9.

f. Penawaran Umum Saham Terbatas II

Pada tanggal 30 Juli 2007, pada Rapat Umum Pemegang Saham Luar Biasa ("RUPSLB"), Pemegang Saham telah memutuskan untuk melakukan Penawaran Umum Terbatas II kepada para pemegang saham dalam rangka penerbitan sampai dengan sejumlah 1.992.253.110 saham Seri C baru dengan nilai nominal Rp375 (nilai penuh) setiap lembar saham.

***1. GENERAL INFORMATION** (continued)*

***d. Recapitalization** (continued)*

On 20 July 2001, BNI's capital was reduced by 1,965,701,500 Class C shares in connection with the refund of excess recapitalization funds to the Government of Indonesia. The refund was approved by the shareholders at the Extraordinary General Shareholders' Meeting held on 25 June 2001.

e. Quasi-reorganization

In order for BNI to eliminate the negative consequences of being burdened by accumulated losses, BNI undertook quasi-reorganization as approved in the Extraordinary General Shareholders' Meeting ("RUPS-LB") on 15 December 2003.

The quasi-reorganization adjustments which were booked on 30 June 2003 were as follows:

BNI's Articles of Association were amended to reflect the changes in additional paid-in capital as a result of quasi-reorganization, based on Notarial Deed of Agung Prihatin, S.H., No. 42 dated 30 December 2003 which was approved by the Minister of Law and Human Rights of the Republic of Indonesia in its decision letter No. C-29647.HT.01.07.TH.2003 dated 19 December 2003 and was published in the State Gazette No. 1152, Supplement No. 9 dated 30 January 2004.

f. Limited Public Offering II

On 30 July 2007, the Extraordinary General Shareholders' Meeting approved the issuance of up to 1,992,253,110 new Class C shares through Limited Public Offering II to shareholders with a par value per share of Rp375 (full amount).

1. INFORMASI UMUM (lanjutan)

f. Penawaran Umum Saham Terbatas II (lanjutan)

Setiap pemegang 20 saham lama yang namanya tercatat dalam Daftar Pemegang Saham BNI pada tanggal 9 Agustus 2007 pukul 16.00 WIB mempunyai 3 HMETD, dimana setiap 1 HMETD memberikan hak kepada pemegangnya untuk membeli sebanyak 1 saham baru dengan harga pelaksanaan Rp2.025 (nilai penuh) setiap saham. Dari Penawaran Umum Terbatas II, BNI mendapatkan tambahan modal disetor sebesar Rp747.094 dan tambahan agio saham sebesar Rp3.287.218 dan biaya emisi penerbitan saham sebesar Rp195.280.

Perdagangan perdana dilaksanakan pada tanggal 13 Agustus 2007 di Bursa Efek Jakarta dan Bursa Efek Surabaya (sekarang BEI).

g. Penawaran Umum Saham Terbatas III

Pada tanggal 25 November 2010, dalam Rapat Umum Pemegang Saham Luar Biasa (RUPSLB), Pemegang Saham telah memutuskan antara lain untuk menyetujui peningkatan modal ditempatkan dan disetor BNI melalui Penawaran Umum Terbatas III (PUT III) dengan penerbitan HMETD sebesar 3.374.715.948 saham Seri C baru dengan nilai nominal Rp375 (nilai penuh) setiap lembar saham. HMETD tersebut dapat diperdagangkan di dalam dan di luar Bursa Efek Indonesia (BEI) mulai tanggal 10 Desember 2010 sampai dengan 16 Desember 2010, dengan memperhatikan ketentuan yang berlaku di bidang pasar modal. Dari PUT III tersebut, BNI mendapatkan tambahan modal disetor sebesar Rp1.265.519 dan tambahan agio saham, bersih setelah dikurangkan dengan biaya emisi penerbitan saham, sebesar Rp8.950.869.

h. Pemecahan nilai nominal saham BNI

Berdasarkan keputusan RUPSLB tanggal 19 September 2023 yang dituangkan dalam Akta No. 18, tanggal 19 September 2023, yang dibuat dihadapan Ashoya Ratam S.H., M.KN, pemegang saham BNI antara lain menyetujui pemecahan nilai nominal saham *(stock split)* Bank dengan rasio 1:2 yang berlaku efektif pada tanggal 10 Oktober 2023 (lihat Catatan 33).

***1. GENERAL INFORMATION** (continued)*

***f. Limited Public Offering II** (continued)*

Each owner of 20 old shares whose name was registered in the List of Shareholders of BNI as of 9 August 2007 at 16.00 WIB was entitled to 3 pre-emptive rights where each right entitles the owner to buy a new share at the price of Rp2,025 (full amount) per share. From the Limited Public Offering II, BNI raised Rp747,094 additional share capital and Rp3,287,218 additional paid-in capital and Rp195,280 shares issuance cost.

The initial trading took place on 13 August 2007 at the Jakarta Stock Exchange and Surabaya Stock Exchange (currently IDX).

g. Limited Public Offering III

On 25 November 2010, at the Extraordinary General Shareholders' Meeting, the shareholders decided, among other matters, to increase the issued and paid-up capital through limited public offering (LPO III) with pre-emptive right to shareholders for the issuance of 3,374,715,948 new Class C shares with a par value per share of Rp375 (full amount). Such pre-emptive rights can be traded inside and outside the Indonesia Stock Exchange (IDX) starting 10 December 2010 until 16 December 2010, with consideration to the existing capital market regulation. From the LPO III, BNI obtained Rp1,265,519 additional share capital and Rp8,950,869 additional paid-in capital, net of shares issuance cost.

h. Stock split of BNI

Based on the decision of the Extraordinary General Meeting of Shareholders (RUPSLB) dated 19 September 2023, as stated in Deed No. 18 dated 19 September 2023, as recorded in the Notarial Deed of Ashoya Ratam, S.H., M.KN., the shareholders of BNI, among others, approved the nominal value split (stock split) of the Bank with a ratio of 1:2, effective from 10 October 2023 (see Note 33).

1. INFORMASI UMUM (lanjutan)

i. Organisasi dan Struktur Manajemen

Susunan Dewan Komisaris dan Direksi BNI pada tanggal 31 Desember 2024 dan 31 Desember 2023 yang ditetapkan masing-masing berdasarkan Berita Acara RUPS Tahunan BNI yang dinyatakan dengan Akta Notaris No. 3 tanggal 4 Maret 2024 dan Berita Acara RUPS Luar Biasa BNI yang dinyatakan dengan Akta Notaris No. 17 tanggal 19 September 2023 adalah sebagai berikut:

1. GENERAL INFORMATION (continued)

i. Organizational and Management Structure

The composition of the Boards of Commissioners and Directors of BNI as of 31 December 2024 and 31 December 2023 based on BNI's Annual Shareholders' General Meeting as stated under the Notarial Deed No. 3 dated 4 March 2024 and BNI's Extraordinary Shareholders' General Meeting as stated under the Notarial Deed No. 17 dated 19 September 2023, respectively, are as follows:

31 Desember/*December* 2024

Dewan Komisaris		***Board of Commissioners***
Komisaris Utama/ Komisaris Independen	Pradjoto	*President Commissioner/ Independent Commissioner*
Wakil Komisaris Utama	Pahala Nugraha Mansury	*Vice President Commissioner*
Komisaris Independen	Sigit Widyawan	*Independent Commissioner*
Komisaris Independen	Asmawi Syam	*Independent Commissioner*
Komisaris Independen	Septian Hario Seto	*Independent Commissioner*
Komisaris Independen	Iman Sugema	*Independent Commissioner*
Komisaris Independen	Erwin Rijanto Slamet	*Independent Commissioner*
Komisaris	Askolani	*Commissioner*
Komisaris	Mohamad Yusuf Permana	*Commissioner*
Komisaris	Fadlansyah Lubis	*Commissioner*
Komisaris	Robertus Billitea	*Commissioner*

31 Desember/*December* 2024

Direksi		***Board of Directors***
Direktur Utama	Royke Tumilaar	*President Director (CEO)*
Wakil Direktur Utama	Putrama Wahju Setyawan	*Vice President Director*
Direktur *Finance*	Novita Widya Anggraini	*Managing Director - Finance (CFO)*
Direktur *Wholesale & International Banking*	Agung Prabowo	*Managing Director - Wholesale & International Banking*
Direktur *Enterprise & Commercial Banking*	I Made Sukajaya	*Managing Director - Enterprise & Commercial Banking*
Direktur *Risk Management*	David Pirzada	*Managing Director - Risk Management*
Direktur *Institutional Banking*	Munadi Herlambang[1)]	*Managing Director - Institutional Banking*
Direktur *Network & Services*	Ronny Venir	*Managing Director - Network & Services*
Direktur *Digital & Integrated Transaction Banking*	Hussein Paolo Kartadjoemena	*Managing Director - Digital & Integrated Transaction Banking*
Direktur *Retail Banking*	Corina Leyla Karnalies	*Managing Director - Retail Banking*
Direktur *Technology & Operations*	Toto Prasetio	*Managing Director - Technology & Operation*
Direktur *Human Capital & Compliance*	Mucharom	*Managing Director - Human Capital & Compliance*

31 Desember/*December* 2024

Komite Audit*)		***Audit Committee*)**
Ketua	Asmawi Syam	*Chairman*
Anggota	Sigit Widyawan	*Member*
Anggota	Iman Sugema	*Member*
Anggota	Human Brillianto	*Member*
Anggota	Suhendi Muharam	*Member*

1. Efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan (OJK)

*) Pembentukan Komite Audit Bank telah dilakukan sesuai dengan peraturan OJK No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.

1. Effectively after the issuance of approval from Financial Service Authority

**) The formation of Audit Committee is in accordance with Financial Service Authority rule No. 55/POJK.04/2015 regarding the Establishment and Guidelines for the Work Implementation of the Audit Committee.*

1. INFORMASI UMUM (lanjutan)

i. Organisasi dan Struktur Manajemen (lanjutan)

1. GENERAL INFORMATION *(continued)*

i. Organizational and Management Structure *(continued)*

Dewan Komisaris	**31 Desember/*December* 2023**	***Board of Commissioners***
Komisaris Utama/ Komisaris Independen	Pradjoto[1)]	*President Commissioner/ Independent Commissioner*
Wakil Komisaris Utama Komisaris Independen	Pahala Nugraha Mansury[2)]	*Vice President Commissioner/ Independent Commissioner*
Komisaris Independen	Sigit Widyawan	*Independent Commissioner*
Komisaris Independen	Asmawi Syam	*Independent Commissioner*
Komisaris Independen	Septian Hario Seto	*Independent Commissioner*
Komisaris Independen	Iman Sugema	*Independent Commissioner*
Komisaris Independen	Erwin Rijanto Slamet	*Independent Commissioner*
Komisaris	Askolani	*Commissioner*
Komisaris	Susyanto[3)]	*Commissioner*
Komisaris	Fadlansyah Lubis	*Commissioner*
Komisaris	Robertus Billitea[4)]	*Commissioner*

Direksi	**31 Desember/*December* 2023**	***Board of Directors***
Direktur Utama	Royke Tumilaar	*President Director (CEO)*
Wakil Direktur Utama	Adi Sulistyowati[5)]	*Vice President Director*
Direktur *Finance*	Novita Widya Anggraini	*Managing Director - Finance (CFO)*
Direktur *Wholesale & International Banking*	Silvano Winston Rumantir[6)]	*Managing Director - Wholesale & International Banking*
Direktur *Enterprise & Commercial Banking*	Sis Apik Wijayanto[7)]	*Managing Director - Enterprise & Commercial Banking*
Direktur *Risk Management*	David Pirzada	*Managing Director - Risk Management*
Direktur *Institutional Banking*	Muhammad Iqbal[8)]	*Managing Director - Institutional Banking*
Direktur *Network & Services*	Ronny Venir	*Managing Director - Network & Services*
Direktur *Digital & Integrated Transaction Banking*	Corina Leyla Karnalies	*Managing Director - Digital & Integrated Transaction Banking*
Direktur *Retail Banking*	Putrama Wahju Setyawan	*Managing Director - Retail Banking*
Direktur *Technology & Operations*	Toto Prasetio	*Managing Director - Technology & Operation*
Direktur *Human Capital & Compliance*	Mucharom	*Managing Director - Human Capital & Compliance*

Komite Audit*)	**31 Desember/*December* 2023**	***Audit Committee*)**
Ketua	Asmawi Syam	*Chairman*
Anggota	Sigit Widyawan	*Member*
Anggota	Iman Sugema	*Member*
Anggota	Human Brillianto	*Member*
Anggota	Suhendi Muharam	*Member*

1. Efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan (OJK)
2. Efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan (OJK)
3. Masa jabatan berakhir pada 4 Maret 2024
4. Efektif bergabung sejak 11 Desember 2023
5. Masa jabatan berakhir pada 4 Maret 2024
6. Masa jabatan berakhir pada 4 Maret 2024
7. Masa jabatan berakhir pada 4 Maret 2024
8. Masa jabatan berakhir pada 4 Maret 2024

*) Pembentukan Komite Audit Bank telah dilakukan sesuai dengan peraturan OJK No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.

1. Effectively after the issuance of approval from Financial Service Authority
2. Effectively after the issuance of approval from Financial Service Authority
3. Effectively term of office ended on 4 March 2024
4. Effectively joined since 11 December 2023
5. Effectively term of office ended on 4 March 2024
6. Effectively term of office ended on 4 March 2024
7. Effectively term of office ended on 4 March 2024
8. Effectively term of office ended on 4 March 2024

**) The formation of Audit Committee is in accordance with Financial Service Authority rule No. 55/POJK.04/2015 regarding the Establishment and Guidelines for the Work Implementation of the Audit Committee.*

Pada tanggal 31 Desember 2024 dan 31 Desember 2023, Sekretaris Perusahaan BNI adalah Okki Rushartomo Budiprabowo.

As of 31 December 2024 and 31 December 2023, BNI's Corporate Secretary is Okki Rushartomo Budiprabowo.

1. INFORMASI UMUM (lanjutan)

i. Organisasi dan Struktur Manajemen (lanjutan)

Jumlah pegawai BNI adalah sebagai berikut (tidak diaudit):

	Tetap/ *Permanent*	Tidak tetap/ *Non-permanent*	Total	
31 Desember 2024	25,327	1,876	27,203	*31 December 2024*
31 Desember 2023	25,460	2,110	27,570	*31 December 2023*

Kantor pusat BNI berlokasi di Jl. Jend. Sudirman Kav. 1, Jakarta. Pada tanggal 31 Desember 2024, BNI memiliki 17 kantor wilayah, 197 kantor cabang, 1.089 kantor layanan serta 798 outlet lainnya (31 Desember 2023: 17 kantor wilayah, 195 kantor cabang, 1.090 kantor layanan serta 820 outlet lainnya) (tidak diaudit). Selain itu, BNI juga memiliki jaringan di luar negeri melalui 6 kantor cabang luar negeri yang berada di pusat keuangan dunia yaitu Singapura, Hong Kong, Tokyo, London, New York dan Seoul. Di samping itu, BNI juga memiliki 3 kantor perwakilan di Osaka Amsterdam, dan Sydney serta 2 *Limited Purpose Branch* di Singapura.

***1. GENERAL INFORMATION** (continued)*

***i. Organizational and Management Structure** (continued)*

The number of employees of BNI is as follows (unaudited):

BNI's head office is located at Jl. Jend. Sudirman Kav. 1, Jakarta. As of 31 December 2024, BNI has 17 regional offices, 197 domestic branches, 1,089 sub-branches and 798 other outlets (31 December 2023: 17 regional offices, 195 domestic branches, 1,090 sub-branches and 820 other outlets) (unaudited). In addition, BNI has a presence in overseas through 6 overseas branches located in the global financial center located in Singapore, Hong Kong, Tokyo, London, New York and Seoul. Further than that, BNI also has 3 representative offices in Osaka, Amsterdam, and Sydney and 2 Limited Purpose Branch in Singapore.

j. Entitas Anak

BNI mempunyai kepemilikan langsung pada Entitas Anak berikut:

j. Subsidiaries

BNI has direct ownership in the following Subsidiaries:

Nama Perusahaan/ *Company Name*	Kegiatan Usaha/ *Business Activity*	Tahun Mulai Beroperasi Komersial/ *Year Started Commercial Operations*	Persentase Kepemilikan/ *Percentage of Ownership*		Total Aset/ *Total Assets*	
			31 Desember/ *December* 2024	31 Desember/ *December* 2023	31 Desember/ *December* 2024	31 Desember/ *December* 2023
PT BNI Life Insurance	Asuransi jiwa/ *Life insurance*	1997	60.00%	60.00%	26,675,991	24,972,042
PT BNI Multifinance	Pembiayaan/ *Financing*	1983	99.99%	99.99%	6,075,604	3,788,690
PT BNI Sekuritas dan Entitas Anak/*and Subsidiaries*	Sekuritas/*Securities*	1995	75.00%	75.00%	2,052,447	2,383,585
BNI Remittance Ltd.	Jasa keuangan/ *Financial services*	1998	100.00%	100.00%	8,636	11,537
PT Bank Hibank	Perbankan/*Banking*	1993	63.92%	63.92%	17,798,871	14,615,844
PT BNI Modal Ventura	Permodalan ventura/ *Venture capital*	2022	99.98%	99.98%	517,251	511,415

Semua Entitas Anak BNI berkedudukan di Jakarta, kecuali BNI Remittance Ltd. berkedudukan di Hong Kong.

All of the Subsidiaries of BNI are domiciled in Jakarta, except for BNI Remittance Ltd. which is domiciled in Hong Kong.

PT BNI Life Insurance ("BNI Life")

BNI Life pada awalnya didirikan dengan nama PT Asuransi Jiwa BNI Jiwasraya berdasarkan Akta Notaris No. 24 tanggal 28 November 1996. Pada tanggal 26 November 2004, PT Asuransi Jiwa BNI Jiwasraya telah mengubah nama menjadi PT BNI Life Insurance.

PT BNI Life Insurance ("BNI Life")

BNI Life was originally established under the name PT Asuransi Jiwa BNI Jiwasraya based on Notarial Deed No. 24 dated 28 November 1996. On 26 November 2004, PT Asuransi Jiwa BNI Jiwasraya changed its name to PT BNI Life Insurance.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Life Insurance ("BNI Life") (lanjutan)

Sesuai dengan pasal 3 Anggaran Dasar BNI Life, ruang lingkup kegiatan BNI Life adalah menjalankan usaha-usaha dalam bidang asuransi jiwa termasuk usaha asuransi jiwa dengan prinsip syariah. BNI Life memperoleh izin usaha sebagai perusahaan asuransi jiwa berdasarkan Keputusan Menteri Keuangan Republik Indonesia No. Kep-305/KMK.017/1997 tanggal 7 Juli 1997.

Kantor pusat BNI Life berlokasi di Centennial Tower, Lantai 9, 10, dan 11 Jl. Gatot Subroto Kav. 24-25, Jakarta 12930. Pada tanggal 31 Desember 2024, BNI Life memiliki 14 kantor pemasaran dan 5 kantor pemasaran mandiri (31 Desember 2023: 14 kantor pemasaran dan 5 kantor pemasaran mandiri) yang tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki karyawan sebanyak 897 orang pada tanggal 31 Desember 2024 (31 Desember 2023: 722 karyawan) (tidak diaudit).

PT BNI Multifinance ("BNI Multifinance")

Sesuai dengan Pasal 3 Anggaran Dasar BNI Multifinance, ruang lingkup kegiatan BNI Multifinance adalah menjalankan kegiatan dalam bidang pembiayaan investasi, pembiayaan modal kerja, pembiayaan multi guna dan sewa operasi.

Anggaran Dasar BNI Multifinance telah mengalami beberapa kali perubahan. Perubahan terakhir Anggaran Dasar PT BNI Multifinance dilakukan antara lain tentang perubahan tempat kedudukan sesuai dengan Akta Notaris No. 31 tanggal 24 Juni 2024 dari Notaris I Gede Buda Gunamanta, S.H., dan telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-AH.01.03-0167699 tanggal 3 Juli 2024.

Kantor pusat BNI Multifinance berlokasi di Gedung Graha Binakarsa, lantai 11 Lot. E-F dan lantai 12, Jl. HR Rasuna Said, Kav C-18 Kuningan, Jakarta Selatan 12940. Pada tanggal 31 Desember 2024, BNI Multifinance memiliki 52 outlet cabang (31 Desember 2023: 17 outlet cabang dan 33 cabang pembantu) tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki 843 dan 522 karyawan masing-masing pada tanggal 31 Desember 2024 (tidak diaudit) dan 31 Desember 2023 (tidak diaudit).

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

***PT BNI Life Insurance ("BNI Life")** (continued)*

In accordance with Article 3 of BNI Life's Articles of Association, the scope of BNI Life's activities is to engage in life insurance business including life insurance business under sharia principle. BNI Life obtained its operating license as a life insurance company based on the Minister of Finance of the Republic of Indonesia Decree No. Kep-305/KMK.017/1997 dated 7 July 1997.

BNI Life's head office is located in Centennial Tower, 9th,10th, and 11th floor Jl. Gatot Subroto Kav. 24-25, Jakarta 12930. As of 31 December 2024, BNI Life has 14 marketing offices and 5 personal marketing offices (31 December 2023: 14 marketing offices and 5 personal marketing offices) located in various cities in Indonesia (unaudited) and has 897 employees as of 31 December 2024 (31 December 2023: 722 employees) (unaudited).

PT BNI Multifinance ("BNI Multifinance")

In accordance with Article 3 of BNI Multifinance's Articles of Association, the scope of the BNI Multifinance's activities involves investment financing, working capital financing, multipurpose financing and operating lease.

BNI Multifinance's Articles of Association has been amended several times. The latest amendment of PT BNI Multifinance's Articles of Association was made regarding domicile changes based on Notarial Deed No. 31 dated 24 June 2024 of Notary I Gede Buda Gunamanta, S.H., and has been approved by the Minister of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-AH.01.03-0167699 dated 3 July 2024.

BNI Multifinance head office is located in Gedung Graha Binakarsa, 11th Lot E-F and 12th floor, Jl. HR Rasuna Said, Kav C-18 Kuningan, South Jakarta 12940. As of 31 December 2024, BNI Multifinance has 52 branches (31 December 2023: 17 branches and 33 sub-branches) located in various cities in Indonesia (unaudited) and had 843 and 522 employees as of 31 December 2024 (unaudited) and 31 December 2023 (unaudited).

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Sekuritas ("BNI Sekuritas") dan Entitas Anak

BNI Sekuritas didirikan berdasarkan Akta Notaris No. 22 tanggal 12 April 1995 dari Koesbiono Sarmanhadi, S.H., di Jakarta. Akta tersebut kemudian diubah dengan Akta Notaris No. 39 dari notaris yang sama tanggal 3 Mei 1995. Akta pendirian dan perubahannya disahkan oleh Menteri Kehakiman Republik Indonesia dalam Surat Keputusan No. C2-6278.HT.01.01.Th.95 tanggal 19 Mei 1995, serta diumumkan dalam Berita Negara Republik Indonesia No. 55, Tambahan No. 5804 tanggal 11 Juli 1995.

Berdasarkan Pasal 3 dari Anggaran Dasar BNI Sekuritas, ruang lingkup kegiatan usahanya meliputi perdagangan efek, termasuk di dalamnya bertindak sebagai penjamin dan penasehat investasi dan kegiatan lain yang berhubungan dengan kegiatan tersebut dengan memperhatikan peraturan Otoritas Jasa Keuangan (OJK), dahulu Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) dan peraturan perundang-undangan lain yang berlaku.

BNI Sekuritas memiliki 99.90% dari jumlah saham PT BNI Asset Management ("BNI Asset Management"), entitas anak yang didirikan tanggal 28 Maret 2011 dan bergerak di bidang manajemen dan penasehat investasi.

BNI Sekuritas memiliki 100.00% dari jumlah saham BNI Securities Pte. Ltd. ("BSPL") yang didirikan pada tanggal 22 Maret 2021 dan telah mendapat izin dari *Monetary Authority Singapore* (MAS) pada tanggal 8 Desember 2021.

Kantor pusat BNI Sekuritas berlokasi di Sudirman Plaza Indofood Tower, lantai 16, Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia. Pada tanggal 31 Desember 2024, Perusahaan memiliki 16 outlet cabang yang tersebar di beberapa kota di Indonesia (2023: 19 outlet cabang) (tidak diaudit). BNI Sekuritas memiliki karyawan tetap sebanyak 346 dan 286 orang masing-masing pada tanggal 30 Desember 2024 dan 31 Desember 2023 (tidak diaudit).

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

PT BNI Sekuritas ("BNI Sekuritas") and Subsidiary

BNI Sekuritas was established by virtue of Notarial Deed No. 22 dated 12 April 1995 of Koesbiono Sarmanhadi, S.H., in Jakarta. The deed was amended by Notarial Deed No. 39 dated 3 May 1995 of the same notary. The Deed of Establishment and amendment thereon were approved by the Decision Letter of the Minister of Justice of the Republic of Indonesia No. C2-6278.HT.01.01.Th.95 dated 19 May 1995 and was published in the State Gazette No. 55, Supplement No. 5804 dated 11 July 1995.

In accordance with Article 3 of BNI Sekuritas' Articles of Association, the scope of its business activities comprises of securities trading, including investment underwriting and advisory investment and other related activities allowed by Financial Service Authority (OJK), previously the Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) and other regulations.

BNI Sekuritas owns 99,90% of the total share capital of PT BNI Asset Management ("BNI Asset Management"), a subsidiary established on 28 March 2011 and engaged in investment management and advisory activities.

BNI Sekuritas owns 100,00% of the total share capital of BNI Securities Pte. Ltd. ("BSPL") which was established on 22 March 2021 and had obtained licensed issued by Monetary Authority Singapore (MAS) on 8 December 2021.

BNI Sekuritas' head office is located in Sudirman Plaza Indofood Tower, 16th floor, Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia. As of 30 December 2024, the Company has 16 outlets located in various cities in Indonesia (2023: 19 outlets) (unaudited). BNI Sekuritas has 346 and 286 permanent employees as of 31 December 2024 and 31 December 2023, respectively (unaudited).

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

BNI Remittance Ltd. (dahulu BNI Nakertrans)

BNI Remittance Ltd. telah menambah modalnya sebesar HKD7.434.944 (nilai penuh) setara dengan Rp10.000 pada tanggal 11 Juni 2009 yang dicatat menggunakan metode biaya. Kantor pusat BNI Remittance Ltd. berada di Causeway Bay, Hong Kong dan memiliki karyawan sebanyak 6 dan 6 orang pada tanggal 31 Desember 2024 dan 31 Desember 2023 (tidak diaudit).

PT Bank Hibank Indonesia (dahulu PT Bank Mayora)

PT Bank Mayora didirikan pada tahun 1993 berdasarkan Akta No. 14 tanggal 25 Februari 1993 dari Dr. Widjojo Wilami, S.H., notaris di Jakarta. Akta pendirian ini telah mendapat pengesahan dari Menteri Kehakiman Republik Indonesia melalui Surat Keputusannya No. C2-108.HT.01.01.Th.1993 tanggal 10 April 1993 serta diumumkan dalam Berita Negara Republik Indonesia No. 44, tanggal 2 Juni 1993, Tambahan No. 2457. Anggaran Dasar PT Bank Mayora telah mengalami beberapa kali perubahan. Perubahan terakhir Anggaran Dasar PT Bank Mayora dilakukan antara lain tentang perubahan penamaan perseroan menjadi PT Bank Hibank Indonesia sesuai dengan Akta Notaris No. 42 tanggal 11 April 2023 dari Jose Dima Satria, SH., M.KN. dan telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-0022392.AH.01.02 tanggal 14 April 2023.

PT Bank Hibank Indonesia tergabung dalam Kelompok Usaha Bank (KUB) BNI sebagaimana penegasan terhadap rencana pembentukan KUB BNI yang disampaikan oleh Otoritas Jasa Keuangan cfm. Surat OJK No. S-83/PB.31/2022 tanggal 23 Mei 2022 dan menjadi bagian dari anggota Lembaga Jasa Keuangan Konglomerasi Keuangan BNI sebagaimana telah dicatat dalam administrasi pengawasan OJK cfm. Surat OJK No. S-88/PB.31/2022 tanggal 9 Juni 2022.

Sesuai dengan Surat Keputusan Bank Indonesia No. 15/5/KEP.DpG/2013 tanggal 7 Mei 2013, Bank memperoleh peningkatan status menjadi Bank Devisa.

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

BNI Remittance Ltd. (formerly BNI Nakertrans)

On 11 June 2009, BNI Remittance Ltd. increased its capital by HKD7,434,944 (full amount) equivalent to Rp10,000, which was recorded using the cost method. The main office of BNI Remittance Ltd. is located in Causeway Bay, Hong Kong and has 6 and 6 employees as of 31 December 2024 and 31 December 2023, respectively (unaudited).

PT Bank Hibank Indonesia (formerly PT Bank Mayora)

PT Bank Mayora was established in 1993 based on Notarial Deed No. 14 dated 25 February 1993 of Dr. Widjojo Wilami, S.H., public notary in Jakarta. The Deed of Establishment was approved by the Minister of Justice of the Republic of Indonesia in his Decision Letter No. C2-108.HT.01.01.Th.1993 dated 10 April 1993 and published in the State Gazette of the Republic of Indonesia No. 44 dated 2 June 1993, Supplement No. 2457. Bank Mayora's Articles of Association has been amended several times. The latest amendment of PT Bank Mayora's Articles of Association was made regarding change its name to PT Bank Hibank Indonesia based on Notarial Deed No. 42 dated 11 April 2023 of Notary Jose Dima Satria, SH., M.KN. and has been approved by the Minister of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-0022392.AH.01.02 dated 14 April 2023.

PT Bank Hibank Indonesia incorporated in the BNI Bank Business Group (KUB) as an affirmation of the plan to establish a BNI KUB by the Financial Services Authority (OJK) confirmed by OJK Letter No. S-83/PB.31/2022 dated 23 May 2022 and became a Financial Services Institution member of the BNI Financial Conglomerate as recorded in the OJK supervision administration confirmed by OJK Letter No. S-88/PB.31/2022 dated 9 June 2022.

In accordance with the Decree of Bank Indonesia No. 15/5/KEP.DpG/2013 dated 7 May 2013, the Bank was authorised to operate as a Foreign Exchange Bank.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT Bank Hibank Indonesia (dahulu PT Bank Mayora) (lanjutan)

Kantor pusat PT Bank Hibank Indonesia berlokasi di Jakarta dengan alamat di Rajawali Place Lantai 22-23, Jl. H. R. Rasuna Said No. Kav. B, RW.4, Setia Budi, Kecamatan Setiabudi, Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12910. Pada tanggal 31 Desember 2024, Hibank memiliki 4 kantor cabang, 20 kantor cabang pembantu dan 1 KP non operasional (tidak diaudit) (31 Desember 2023: 3 kantor cabang, 28 kantor cabang pembantu, dan 1 KP non operasional) serta memiliki karyawan sebanyak 559 orang pada tanggal 31 Desember 2024 (31 Desember 2023: 676 orang) (tidak diaudit).

PT BNI Modal Ventura (''BNI Ventures'')

BNI Ventures didirikan pada tahun 2022 berdasarkan Akta No. 17 tanggal 12 April 2022 dari Ariani L. Rachim, notaris di Jakarta. Akta pendirian ini telah mendapatkan pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia yang tertuang dalam Surat No. AHU-0027437.AH.01.01.TAHUN 2022 tanggal 19 April 2022 serta diumumkan dalam Berita Negara Republik Indonesia No. 032 Tambahan Berita Negara RI No. 014450 tanggal 22 April 2022.

Berdasarkan pasal 3 dari Anggaran Dasar BNI Ventures, ruang lingkup kegiatan usahanya mencakup usaha modal ventura yang diselenggarakan secara konvensional, dengan kegiatan usaha meliputi penyertaan saham (*equity participation*), penyertaan melalui pembelian obligasi (*quasi equity participation*), pembiayaan melalui pembelian surat utang yang diterbitkan pasangan usaha pada tahap rintisan awal (*startup*) dan/atau pengembangan usaha, dan/atau pembiayaan usaha produktif. Dalam melakukan kegiatan usahanya, BNI Ventures dapat mengelola dana ventura. Selain usaha modal ventura, BNI Ventures juga dapat menyelenggarakan kegiatan usaha lain yaitu kegiatan jasa berbasis *fee* dan/atau kegiatan usaha lain dengan persetujuan Otoritas Jasa Keuangan (OJK). BNI Ventures telah mendapatkan izin usaha dari OJK pada tanggal 27 Januari 2023.

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

***PT Bank Hibank Indonesia (formerly PT Bank Mayora)** (continued)*

PT Bank Hibank Indonesia head office is located in Jakarta, Rajawali Place Lantai 22-23, Jl. H. R. Rasuna Said No. Kav. B, RW.4, Setia Budi, Kecamatan Setiabudi, Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12910. As of 31 December 2024, Hibank has 4 branches, 20 sub-branches and 1 other outlets (unaudited) (31 December 2023: 3 branches, 28 sub-branches, and 1 other outlets) and has 559 employees as of 31 December 2024 (31 December 2023: 676 employees) (unaudited).

PT BNI Modal Ventura (''BNI Ventures'')

BNI Ventures was established in 2022 based on Deed No. 17 dated 12 April 2022 from Ariani L. Rachim, a notary in Jakarta. This deed of establishment has been approved by the Minister of Law and Human Rights of the Republic of Indonesia as stated in Letter No. AHU-0027437.AH.01.01.TAHUN 2022 dated 19 April 2022 and announced in the State Gazette of the Republic of Indonesia No. 032 Supplement to the State Gazette of the Republic of Indonesia No. 014450 dated 22 April 2022.

Based on article 3 of the Articles of Association of BNI Ventures, the scope of its business activities includes conventional venture capital ventures, with business activities including equity participation, equity participation through the purchase of bonds (quasi equity participation), financing through the purchase of issued debt securities by business partners at the initial startup stage and/or business development, and/or productive business financing. In carrying out its business activities, the BNI Ventures can manage venture funds. In addition to venture capital businesses, BNI Ventures can also carry out other business activities, namely fee-based service activities and/or other business activities with the approval of the Financial Services Authority (OJK). BNI Ventures has obtained a business license from OJK on 27 January 2023.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Modal Ventura (''BNI Ventures'') (lanjutan)

Anggaran Dasar BNI Ventures mengalami perubahan pada Juni 2024, terkait pasal 12 ayat 5 dan pasal 15 ayat 5 tentang Perubahan Masa Jabatan Direksi dan Dewan Komisaris yang tertuang dalam Pernyataan Keputusan Pemegang Saham di luar Rapat Umum Pemegang Saham Luar Biasa No. 6 tanggal 21 Juni 2024, yang dibuat di hadapan Fifidiana, S.H., S.S., M.Kn., di Jakarta Pusat, yang telah diterima dan dicatat oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Nomor AHU-AH.01.03-0154217 tanggal 24 Juni 2024.

Anggaran Dasar terakhir mengalami perubahan pada Juli 2024, terkait dengan Perubahan terhadap pasal 3 dan pasal 13 ayat 4 huruf b angka 4 yang mengatur tentang maksud dan tujuan serta kegiatan Perusahaan dan tugas, wewenang, dan kewajiban Direksi yang tertuang dalam Akta Notaris No. 5 tanggal 8 Juli 2024 oleh Fifidiana, S.H., S.S., M.Kn., di Jakarta. Perubahan ini mendapatkan persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Nomor AHU 0041133.AH.01.02.TAHUN 2024 tanggal 9 Juli 2024 serta telah diterima dan dicatat oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Nomor AHU-AH.01.03-0169933 tanggal 9 Juli 2024.

Kantor pusat BNI Ventures berlokasi di Jakarta dengan alamat di Menara BNI Pejompongan, Lantai 2, Jl. Pejompongan Raya No. 7, Bendungan Hilir, Tanah Abang, Jakarta 10210. BNI Ventures memiliki karyawan sebanyak 17 orang dan 12 orang masing-masing pada tanggal 31 Desember 2024 dan 31 Desember 2023 (tidak diaudit).

k. Entitas Asosiasi

PT Bank Syariah Indonesia Tbk

BNI Syariah didirikan dengan Akta Pendirian No. 160 tanggal 22 Maret 2010 yang dibuat di hadapan Aulia Taufani, S.H., sebagai Pengganti Sutjipto, S.H., notaris di Jakarta. Akta Pendirian tersebut telah memperoleh pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui Surat No. AHU-15574.AH.01.01.Tahun 2010 tanggal 25 Maret 2010.

1. GENERAL INFORMATION *(continued)*

j. Subsidiaries *(continued)*

PT BNI Modal Ventura (''BNI Ventures'') *(continued)*

The Articles of Association of BNI Ventures has been amended in June 2024, regarding article 12 paragraph 5 and article 15 paragraph 5 about the Change of Term of Office for the Board of Directors and the Board of Commissioners as stated in the Shareholders' Decision Statement outside the Extraordinary General Shareholders' Meeting No. 6 on 21 June 2024, of Fifidiana, S.H., S.S., M.Kn., in Central Jakarta, which has been received and recorded by the Minister of Laws and Human Rights of the Republic of Indonesia with Letter Number AHU-AH.01.03-0154217 on 24 June 2024.

The most recent amendment to the Articles of Association occurred in July 2024, related to changes to article 3 and article 13 paragraph 4 letter b number 4, which regulate the purpose and objectives as well as the activities of the Company, and the duties, authorities, and obligations of the Board of Directors, as stated in Notarial Deed No. 5 dated 8 July 2024, by Fifidiana, S.H., S.S., M.Kn., in Jakarta. This amendment received approval from the Minister of Law and Human Rights of the Republic of Indonesia with Letter Number AHU 0041133.AH.01.02.YEAR 2024 dated 9 July 2024, and has been received and recorded by the Minister of Laws and Human Rights of the Republic of Indonesia with Letter Number AHU-AH.01.03-0169933 dated 9 July 2024.

BNI Ventures head office is located in Jakarta, at BNI Pejompongan Tower, 2th floor, Jl. Pejompongan Raya No. 7, Bendungan Hilir, Tanah Abang, Jakarta 10210. BNI Ventures had 17 employees and 12 employees as of 31 December 2024 and 31 December 2023 (unaudited).

k. Associates

PT Bank Syariah Indonesia Tbk

BNI Syariah was established based on Establishment Deed No. 160 dated 22 March 2010 which was notarised by Aulia Taufani, S.H., as the substitute of Sutjipto, S.H., notary in Jakarta. The Establishment Deed was approved by the Ministry of Laws and Human Rights of the Republic of Indonesia through Letter No. AHU-15574.AH.01.01.Year 2010 dated 25 March 2010.

1. INFORMASI UMUM (lanjutan)

k. Entitas Asosiasi (lanjutan)

PT Bank Syariah Indonesia Tbk (lanjutan)

Sejak tanggal 1 Februari 2021, BNI Syariah telah resmi bergabung ke Bank Syariah Indonesia sesuai persetujuan Otoritas Jasa Keuangan (OJK) Pasar Modal melalui surat No. S-289/D.04/2020 tertanggal 11 Desember 2020 serta melalui surat OJK Perbankan No. 4/KDK.03/2021 tanggal 27 Januari 2021.

Dengan bergabungnya BNI Syariah ke Bank Syariah Indonesia, maka pengendalian BNI terhadap BNI Syariah telah berakhir dan tidak dilakukan konsolidasi atas laporan keuangan Bank Syariah Indonesia pada laporan keuangan konsolidasian BNI dan Entitas Anak.

Sejak 1 Februari 2021, Penyertaan BNI terhadap Bank Syariah Indonesia dianggap sebagai penyertaan terhadap perusahaan asosiasi dengan pengaruh signifikan yang dicatat menggunakan metode ekuitas.

***1. GENERAL INFORMATION** (continued)*

***k. Associates** (continued)*

***PT Bank Syariah Indonesia Tbk** (continued)*

Since 1 February 2021, BNI Syariah has officially joined Bank Syariah Indonesia as approved by The Financial Service Authority (OJK) Capital Market through letter No. S-289/D.04/2020 dated 11 December 2020 as well as through OJK Perbankan through letter No. 4/KDK.03/2021 dated 27 January 2021.

By joining BNI Syariah to Bank Syariah Indonesia, BNI's control of BNI Syariah has ended and there is no consolidation of the financial statements of Bank Syariah Indonesia in the consolidated financial statements of BNI and its Subsidiaries.

Since 1 February 2021, BNI's participation in Bank Syariah Indonesia is considered as participation in associated companies with significant influence which is recorded using the equity method.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL

Laporan keuangan konsolidasian interim BNI dan Entitas Anak ("Grup") ini diselesaikan dan diotorisasi untuk terbit oleh Direksi pada tanggal 22 Januari 2025.

Kebijakan akuntansi material yang diterapkan dalam penyusunan laporan keuangan konsolidasian interim BNI dan Entitas Anak ("Grup") adalah seperti dijabarkan dibawah ini:

a. Dasar penyusunan laporan keuangan konsolidasian

Berikut ini adalah ikhtisar kebijakan akuntansi material yang diterapkan dalam penyusunan laporan keuangan konsolidasian Grup yang disusun berdasarkan Standar Akuntansi Keuangan di Indonesia yang mencakup Pernyataan Standar Akuntansi Keuangan ("PSAK") dan Interpretasi Standar Akuntansi Keuangan ("ISAK") yang diterbitkan oleh Ikatan Akuntan Indonesia dan Peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan ("BAPEPAM-LK") No. VIII.G.7 tentang Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik, yang terlampir dalam surat keputusan No. KEP-347/BL/2012. Peraturan tersebut sekarang merupakan regulasi dari Otoritas Jasa Keuangan ("OJK").

2. MATERIAL ACCOUNTING POLICY INFORMATION

The interim consolidated financial statements of BNI and its Subsidiaries ("Group") were completed and authorised for issuance by the Board of Directors on 22 January 2025.

The material accounting policies adopted in preparing the interim consolidated financial statements of BNI and Subsidiaries ("Group") are set out below:

a. Basis of preparation of the consolidated financial statements

Presented below are the summary of material accounting policies applied in the preparation of the consolidated financial statements of the Group in accordance with Indonesian Financial Accounting Standards which comprise of Statements of Financial Accounting Standards ("SFAS") and Interpretation of Financial Accounting Standards ("ISFAS") issued by Institute of Indonesian Chartered Accountant and the Capital Market and Financial Institution Supervisory Agency ("BAPEPAM-LK")'s Regulation No. VIII.G.7 regarding the Presentations and Disclosures of Financial Statements of Listed Entity, enclosed in the decision letter No. KEP-347/BL/2012. The regulation is now a regulation under Indonesian Financial Services Authority ("OJK").

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

a. Dasar penyusunan laporan keuangan konsolidasian (lanjutan)

Laporan keuangan konsolidasian disusun sesuai dengan PSAK 201, "Penyajian Laporan Keuangan".

Laporan keuangan konsolidasian telah disajikan berdasarkan konsep harga perolehan, yang dimodifikasi oleh revaluasi tanah dan bangunan, aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan aset dan liabilitas keuangan (termasuk instrumen derivatif) yang diukur pada nilai wajar melalui laba rugi, serta disusun dengan dasar akrual, kecuali laporan arus kas konsolidasian.

Laporan arus kas konsolidasian disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi dan pendanaan. Kas dan setara kas terdiri dari kas, giro pada Bank Indonesia dan giro pada bank lain, penempatan pada bank lain dan Sertifikat Bank Indonesia yang jatuh tempo dalam waktu 3 bulan atau kurang sejak tanggal perolehan, sepanjang tidak digunakan sebagai jaminan atas pinjaman yang diterima serta tidak dibatasi penggunaannya.

Pos-pos dalam penghasilan komprehensif lainnya disajikan terpisah antara akun-akun yang akan direklasifikasikan ke laba rugi dan akun-akun yang tidak akan direklasifikasikan ke laba rugi.

Mata uang pelaporan yang digunakan dalam laporan keuangan konsolidasian adalah mata uang Rupiah (Rp). Angka-angka yang disajikan dalam laporan keuangan konsolidasian, kecuali bila dinyatakan secara khusus, adalah dibulatkan dalam jutaan Rupiah.

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan

Berikut ini adalah standar akuntansi keuangan, perubahan dan interpretasi standar akuntansi keuangan yang berlaku efektif sejak 1 Januari 2024.

- Amendemen PSAK 116: "Sewa" terkait liabilitas sewa pada transaksi jual dan sewa-balik; dan
- Amendemen PSAK 201: "Penyajian Laporan Keuangan" terkait liabilitas jangka panjang dengan kovenan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***a. Basis of preparation of the consolidated financial statements** (continued)*

The consolidated financial statements are prepared in accordance with SFAS 201, "Presentation of Financial Statements".

The consolidated financial statements have been prepared on a historical cost basis, as modified by revaluation of land and buildings, financial assets at fair value through other comprehensive income, and financial assets and liabilities (including derivative instruments) at fair value through profit or loss, and under the accrual basis of accounting, except for consolidated statements of cash flows.

The consolidated statements of cash flows are prepared in the direct method with cash flows classified into operating, investing and financing activities. Cash and cash equivalents consist of cash, current accounts with Bank Indonesia and current accounts with other banks, placements with other banks and Certificates of Bank Indonesia maturing within 3 months from the date of acquisition, and which are not pledged as collateral for borrowings nor restricted.

Items within other comprehensive income are classified separately, between accounts which will be reclassified to profit or loss and which will not be reclassified to profit or loss.

The reporting currency used for the consolidated financial statements is the Indonesian Rupiah (Rp). Unless otherwise stated, all figures presented in the consolidated financial statements are rounded off to millions of Rupiah.

b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards

The followings are financial accounting standard, amendments and interpretation of financial accounting standard which become effective starting 1 January 2024.

- *Amendment of SFAS 116: "Leases" regarding lease liabilities in sale-and-lease back transactions; and*
- *Amendment of SFAS 201: "Presentation of Financial Statements" regarding long-term liabilities with the covenant.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

Berikut ini adalah standar akuntansi keuangan, perubahan dan interpretasi standar akuntansi keuangan yang berlaku efektif sejak 1 Januari 2025.

- PSAK 117: "Kontrak Asuransi";
- Amendemen PSAK 117: "Kontrak Asuransi" terkait Penerapan Awal PSAK 117 dan PSAK 109 - Informasi Komparatif; dan
- Amendemen PSAK 221: "Pengaruh Perubahan Kurs Valuta Asing" terkait kondisi ketika suatu mata uang tidak tertukarkan.

PSAK 117: Kontrak Asuransi

PSAK 117 menetapkan prinsip-prinsip untuk pengakuan, pengukuran, penyajian, dan pengungkapan kontrak asuransi serta menggantikan standar kontrak asuransi PSAK 104 yang berlaku saat ini.

PSAK 117 mencakup beberapa perbedaan mendasar dibandingkan dengan standar akuntansi kontrak asuransi saat ini dalam hal, diantaranya pengukuran, pengakuan laba dan penyajian kontrak asuransi. Dalam hal pengukuran kontrak asuransi, ada tiga model pengukuran baru yang diperkenalkan di bawah PSAK 117, yang terdiri dari *General Measurement Model* (GMM), *Variable Fee Approach* (VFA), and *Premium Allocation Approach* (PAA).

Dampak penerapan awal PSAK 117 mencakup hal-hal berikut:

- Perubahan kebijakan akuntasi sebagai dampak dari penerapan PSAK 117 harus diterapkan dengan pendekatan retrospektif penuh sejauh yang dapat dilaksanakan. Grup menerapkan pendekatan retrospektif yang dimodifikasi dan pendekatan nilai wajar apabila pendekatan retrospektif penuh tidak dapat dilaksanakan dalam menentukan jumlah transisi pada tanggal transisi PSAK.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

The followings are financial accounting standard, amendments and interpretation of financial accounting standard which become effective starting 1 January 2025.

- *SFAS 117: "Insurance Contract";*
- *Amendment of SFAS 117: "Insurance Contract" regarding Initial Application of SFAS 117 and SFAS 109 - Comparative Information; and*
- *Amendment of SFAS 221: "The Effect of Changes in Foreign Exchange Rates" regarding to conditions when a currency is not exchangeable.*

SFAS 117 "Insurance Contract"

SFAS 117 establishes principles for the recognition, measurement, presentation and disclosure of insurance contracts and supersedes the SFAS 104 insurance contracts standard.

SFAS 117 includes some fundamental differences to current accounting in both insurance contracts in relation, among others, measurement, income recognition and presentation insurance contract. In relation to the insurance contract measurement, there are three new measurement models introduced under SFAS 117 consisting of General Measurement Model (GMM), Variable Fee Approach (VFA), and Premium Allocation Approach (PAA).

The impact of initial application of SFAS 117 include the following:

- *Changes in accounting policies resulting from the adoption of SFAS 117 shall apply with a full retrospective approach to the extent practicable. The Group adopts both the modified retrospective approach and the fair value approach when it is impracticable to use a full retrospective approach in determining transition impact at the SFAS transition date.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: Kontrak Asuransi (lanjutan)

Dampak penerapan awal PSAK 117 mencakup hal-hal berikut: (lanjutan)

- Standar ini memperkenalkan diskonto wajib atas cadangan kerugian, transparansi yang lebih tinggi atas portofolio merugi yang disebabkan oleh pengujian kontrak yang lebih rinci, dan pengenalan penyesuaian risiko untuk risiko non-finansial yang serupa dengan *Provision of Risk Margin for Adverse Deviation* (PAD) pada liabilitas klaim di PSAK 104. Standar tersebut mengharuskan tingkat diskonto ditentukan menggunakan data pasar yang dapat diobservasi berdasarkan kurva dasar bebas risiko dan penyesuaian khusus portofolio untuk mencerminkan tidak likuidnya liabilitas asuransi.

- PSAK 117 mengharuskan kerugian yang diharapkan selama masa berlaku kontrak untuk tercermin pada pengakuan awal dalam laporan laba rugi dan laporan posisi keuangan sebagai komponen kerugian.

Grup akan mengadopsi PSAK 117 untuk pertama kalinya untuk tahun buku mulai 1 Januari 2025. Saat ini, Grup sedang melakukan penilaian mendalam mengenai dampak terhadap laporan keuangan akibat penerapan standar baru ini. Group akan menyajikan kembali informasi komparatif berdasarkan pendekatan transisi yang diambil pada saat adopsi PSAK 117.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

SFAS 117 "Insurance Contract" (continued)

The impact of initial application of SFAS 117 include the following: (continued)

- *The standard introduces mandatory discounting of loss reserves, higher transparency of loss-making portfolios due to more granular onerous contract testing, and the introduction of risk adjustment for non-financial risk which is similar to the Provision of Risk Margin for Adverse Deviation (PAD) in SFAS 104 for claim liabilities. The standard requires the discount rates to be determined using observable market data based on a risk-free base curve and portfolio specific adjustments to reflect the illiquidity of insurance liabilities.*

- *SFAS 117 requires expected losses over a contract's lifetime to be reflected at initial recognition in the statement of profit or loss and the statement of financial position as a loss component.*

Group will adopt SFAS 117 for the first time for the financial year beginning 1 January 2025. Currently, Group is in the midst of conducting a detailed assessment on the impact to the financial statements on adopting the new standard. Group will restate the comparative information based on the transition approaches taken on adoption of SFAS 117.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: Kontrak Asuransi (lanjutan)

Grup telah mengkaji dampak dari standar dan interpretasi tersebut sebagaimana dijabarkan di bawah ini:

i. Transisi

Grup berencana untuk mengadopsi PSAK 117 secara retrospektif dengan menerapkan metode transisi sebagai berikut:

- Pendekatan retrospektif penuh diterapkan pada kontrak asuransi yang dibuat dari tahun 2022 hingga 2023 sebelum transisi.
- Pendekatan nilai wajar diterapkan pada kontrak asuransi tahun 2021 dan sebelumnya.

Pendekatan transisi untuk reasuransi akan mengikuti pendekatan yang akan diterapkan untuk bisnis asuransi yang mendasarinya.

ii. Klasifikasi dan Model Pengukuran

Suatu kontrak diklasifikasikan sebagai kontrak asuransi apabila kontrak tersebut menerima risiko asuransi yang signifikan dari pihak lain (pemegang polis) dan sepakat untuk memberikan kompensasi kepada pemegang polis jika suatu peristiwa masa depan yang tidak pasti (peristiwa yang diasuransikan) berdampak buruk pada pemegang polis.

Grup mendefinisikan kontrak yang memiliki risiko asuransi yang signifikan sebagai kontrak asuransi. Selanjutnya, kontrak asuransi akan diukur berdasarkan *Group of Contract* menggunakan *General Measurement Model (GMM), Premium Allocation Approach (PAA) atau Variable Fee Approach (VFA).*

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards *(continued)*

SFAS 117 "Insurance Contract" (continued)

Group has assessed the impact of these new standards and interpretations as set out below:

i. Transition

Group plan to adopt SFAS 117 retrospectively by the following applying transition methods:

- *Full retrospective approach will be applied to the insurance contracts that were originated from years 2022 to 2023 prior to transition.*
- *Fair value approach will be applied to insurance contracts that were originated from year 2021 and earlier.*

The transition approaches for reinsurance will follow the approaches to be applied for underlying insurance business.

ii. Classification and Measurement models

A contract is classified as insurance contract when it accepts significant insurance risk from another party (the policyholder) and agree to compensate the policyholder if a specified uncertain future event (the insured event) adversely affects the policyholder.

Group defines the contract that have significant insurance risk as insurance contract. Subsequently, the insurance contracts will be measured based on Group of Contract level using General Measurement Model (GMM), Premium Allocation Approach (PAA) or Variable Fee Approach (VFA).

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: Kontrak Asuransi (lanjutan)

Grup telah mengkaji dampak dari standar dan interpretasi tersebut sebagaimana dijabarkan di bawah ini: (lanjutan)

iii. Unit akun

Grup telah menetapkan unit akunnya untuk kontrak asuransi yang diterbitkan agar selaras dengan lini bisnis yang digunakannya untuk melapor kepada regulator utamanya/spesifikasi produk/lainnya. Untuk kontrak reasuransi yang dimiliki, unit akun sesuai dengan bentuk hukum kontrak reasuransi yang dimiliki/jenis kontrak reasuransi/lainnya.

Manajemen mengidentifikasi adanya kombinasi dan pemisahan kontrak asuransi di dalam Grup.

iv Kontrak yang merugi

Kontrak diakui sebagai kontrak yang memberatkan jika diperkirakan akan menimbulkan kerugian pada saat dimulainya kontrak. Kontrak-kontrak tersebut membentuk kelompoknya sendiri dan kerugian yang diperkirakan segera diakui dalam laporan laba rugi. Berdasarkan penilaian Manajemen, terdapat fakta dan keadaan yang mengindikasikan bahwa sekelompok kontrak asuransi menjadi merugi.

v. Pengakuan dan penghentian pengakuan

Grup telah menetapkan bahwa titik pengakuan dan penghentian pengakuannya akan berbeda antara PSAK 104 dan PSAK 117. Berdasarkan PSAK 117, Grup mengakui sekelompok kontrak asuransi sejak tanggal awal periode pertanggungan, tanggal jatuh tempo pembayaran pertama dari pemegang polis dalam kelompok tersebut, dan saat kelompok tersebut menjadi memberatkan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

SFAS 117 "Insurance Contract" (continued)

Group has assessed the impact of these new standards and interpretations as set out below: (continued)

iii. Unit of account

Group has defined its units of account for insurance contracts issued to be align with the lines of business that it uses to report to its primary regulator/product specification/others. For reinsurance contracts held, the unit of account corresponds to the legal form of the reinsurance contract held/type of reinsurance contract/others.

Management identified any combination and separation of insurance contracts within the Group.

iv. Onerous contract

Contracts are recognised as onerous if they are expected to be loss making at inception. Those contracts form their own groups and expected losses are immediately recognized in the statement of profit or loss. Based on Management's, assessment there are facts and circumstances which indicate that a group of insurance contracts has become onerous.

v. Recognition and derecognition

Group has determined that its recognition and derecognition points will differ between SFAS 104 and SFAS 117. Under SFAS 117, the Group recognizes a group of insurance contracts from the earliest date in between the beginning of the coverage period, the date when the first payment from a policyholder in the group becomes due, and when the group becomes onerous.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: Kontrak Asuransi (lanjutan)

Grup telah mengkaji dampak dari standar dan interpretasi tersebut sebagaimana dijabarkan di bawah ini: (lanjutan)

v. Pengakuan dan penghentian pengakuan (lanjutan)

Jika terdapat skenario yang mengindikasikan modifikasi kontrak asuransi, Grup akan menilai lebih lanjut apakah hal tersebut dapat menyebabkan penghentian pengakuan.

vi. Penyesuaian risiko

Penyesuaian risiko dilakukan berdasarkan tingkat diversifikasi atas manfaat dan hasil ekspektasi yang menguntungkan dan tidak menguntungkan dengan cara yang mencerminkan tingkat penghindaran risiko Grup. Penyesuaian risiko dihitung pada tingkat entitas penerbit dan kemudian dialokasikan ke setiap kelompok kontrak sesuai dengan profil risikonya.

vii. Tingkat diskonto

Berdasarkan PSAK 117, perubahan utamanya adalah kini tingkat diskonto secara eksplisit diwajibkan untuk mempertimbangkan waktu, mata uang, dan karakteristik likuiditas arus kas dalam kontrak asuransi, yang mungkin berbeda dari aset pendukung liabilitas tersebut. Grup akan menggunakan pendekatan *bottom-up* untuk memperoleh tingkat diskonto arus kas. Dalam pendekatan ini, tingkat diskonto ditentukan sebagai hasil bebas risiko, disesuaikan dengan perbedaan karakteristik likuiditas antara aset keuangan yang digunakan untuk memperoleh hasil bebas risiko dan arus kas liabilitas yang relevan (dikenal sebagai 'premi likuiditas').

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards *(continued)*

SFAS 117 "Insurance Contract" (continued)

Group has assessed the impact of these new standards and interpretations as set out below: (continued)

v. Recognition and derecognition *(continued)*

If there are any scenarios which indicate modification of the insurance contract, the Group will further assess whether it could lead to derecognition.

vi. Risk adjustment

The risk adjustment is made on the degree of diversification benefits and expected favorable and unfavorable outcomes in a way that reflects the Group's degree of risk aversion. The risk adjustment was calculated at the issuing entity level and then allocated down to each group of contracts in accordance with their risk profiles.

vii. Discount rate

Under SFAS 117, the key change is that the discount rate is now explicitly required to consider the timing, currency, and liquidity characteristics of the cash flows in insurance contracts, which may be different from the assets supporting those liabilities. Group will use the bottom-up approach to derive the discount rate for the cash flows. Under this approach, the discount rate is determined as the risk-free yield, adjusted for differences in liquidity characteristics between the financial assets used to derive the risk-free yield and the relevant liability cash flows (known as an 'illiquidity premium').

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: Kontrak Asuransi (lanjutan)

Grup telah mengkaji dampak dari standar dan interpretasi tersebut sebagaimana dijabarkan di bawah ini: (lanjutan)

viii. Alokasi beban

Grup melakukan studi biaya secara berkala dan menggunakan pertimbangan untuk menentukan sejauh mana biaya *overhead* tetap dan variabel dapat diatribusikan secara langsung untuk memenuhi kontrak asuransi. Beberapa biaya yang tidak dapat diatribusikan secara langsung sebelumnya dimasukkan dalam estimasi arus kas masa depan berdasarkan PSAK 104, sementara kini biaya tersebut akan dikecualikan dari estimasi arus kas masa depan berdasarkan PSAK 117, dan sebagai gantinya dibebankan saat terjadi.

ix. Penyajian dan pengungkapan

Berdasarkan PSAK 117, aset dan liabilitas yang terkait dengan kontrak asuransi yang diterbitkan akan disajikan sebagai aset kontrak asuransi dan liabilitas kontrak asuransi. Sementara itu, aset dan liabilitas yang terkait dengan kontrak reasuransi yang dimiliki akan disajikan sebagai aset kontrak reasuransi dan liabilitas kontrak reasuransi. Saldo kontrak asuransi dan reasuransi ini akan terdiri dari liabilitas atas sisa masa pertanggungan *(LRC)* dan liabilitas atas kejadian klaim *(LIC)*.

c. Aset dan liabilitas keuangan

(i) Klasifikasi

Grup mengklasifikasikan aset keuangannya berdasarkan kategori sebagai berikut pada saat pengakuan awal:

- Aset keuangan yang diukur pada nilai wajar melalui laba rugi;
- Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain;
- Aset keuangan yang diukur pada biaya perolehan diamortisasi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

SFAS 117 "Insurance Contract" (continued)

Group has assessed the impact of these new standards and interpretations as set out below: (continued)

viii. Expense allocation

Group performs regular expense studies and uses judgement to determine the extent to which fixed and variable overheads are directly attributable to fulfilling insurance contracts. Certain non-directly attributable expenses were previously included within the estimate of future cash flows under SFAS 104, while currently these expenses will be excluded from the estimate of future cash flows under SFAS 117, and instead expensed as incurred.

ix. Presentation and disclosure

Under SFAS 117, assets and liabilities associated with insurance contracts issued will be presented as insurance contract assets and insurance contract liabilities. Meanwhile, assets and liabilities associated with reinsurance contracts held will be presented as reinsurance contract assets and reinsurance contract liabilities. These insurance and reinsurance contract balances will comprise of the liability for remaining coverage (LRC) and liability for incurred claim (LIC).

c. Financial assets and liabilities

(i) Classification

The Group classifies its financial assets according to the following categories at initial recognition:

- *Financial assets measured at fair value through profit or loss;*
- *Financial assets measured at fair value through other comprehensive income;*
- *Financial assets measured at amortised cost.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Aset keuangan diukur pada biaya perolehan diamortisasi jika memenuhi kondisi sebagai berikut:

- aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan dalam rangka mendapatkan arus kas kontraktual; dan
- persyaratan kontraktual dari aset keuangan tersebut memberikan hak pada tanggal tertentu atas arus kas yang diperoleh semata dari pembayaran pokok dan bunga (SPPI) dari jumlah pokok terutang.

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain jika memenuhi kondisi sebagai berikut:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk mendapatkan arus kas kontraktual dan menjual aset keuangan; dan
- Persyaratan kontraktual dari aset keuangan tersebut memenuhi kriteria SPPI.

Pada saat pengakuan awal, Grup dapat membuat pilihan yang tidak dapat dibatalkan untuk menyajikan instrumen ekuitas yang bukan dimiliki untuk diperdagangkan pada nilai wajar melalui penghasilan komprehensif lain.

Aset keuangan lainnya yang tidak memenuhi persyaratan untuk diklasifikasikan sebagai aset keuangan diukur pada biaya perolehan diamortisasi atau nilai wajar melalui penghasilan komprehensif lain, diklasifikasikan sebagai diukur pada nilai wajar melalui laba rugi.

Saat pengakuan awal Grup dapat membuat penetapan yang tidak dapat dibatalkan untuk mengukur aset yang memenuhi persyaratan untuk diukur pada biaya perolehan diamortisasi atau nilai wajar melalui penghasilan komprehensif lain pada nilai wajar melalui laba rugi, apabila penetapan tersebut mengeliminasi atau secara signifikan mengurangi inkonsistensi pengukuran atau pengakuan (terkadang disebut sebagai "*accounting mismatch*").

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(i) Classification (continued)

Financial assets are measured at amortised cost if they meet the following conditions:

- *financial assets are managed in a business model that aims to have financial assets in order to obtain contractual cash flow; and*
- *the contractual terms of the financial assets provide rights on a certain date for cash flow obtained solely from payment of principal and interest (SPPI) on the principal amount owed.*

Financial assets are measured at fair value through other comprehensive income if they meet the following conditions:

- *Financial assets are managed in a business model that aims to obtain contractual cash flow and sell financial assets; and*
- *The contractual requirements of the financial assets meet the SPPI criteria.*

At initial recognition, the Group may make an irrevocable choice to present equity instruments that are not held for trading at fair value through other comprehensive income.

Other financial assets that do not meet the requirements to be classified as financial assets measured at amortised cost or fair value through other comprehensive income, are classified as measured at fair value through profit or loss.

At initial recognition, the Group can make an irrevocable determination to measure assets that meet the requirements to be measured at amortised cost or fair value through other comprehensive income at fair value through profit or loss, if the determination eliminates or significantly reduces the measurement or recognition inconsistencies (sometimes referred to as "accounting mismatch").

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Penilaian model bisnis

Model bisnis ditentukan pada level yang mencerminkan bagaimana kelompok aset keuangan dikelola bersama-sama untuk mencapai tujuan bisnis tertentu.

Penilaian model bisnis dilakukan dengan mempertimbangkan, tetapi tidak terbatas pada, hal-hal berikut:

- Bagaimana kinerja dari model bisnis dan aset keuangan yang dimiliki dalam model bisnis dievaluasi dan dilaporkan kepada personil manajemen kunci Grup;
- Apakah risiko yang memengaruhi kinerja dari model bisnis (termasuk aset keuangan yang dimiliki dalam model bisnis) dan khususnya bagaimana cara aset keuangan tersebut dikelola; dan
- Bagaimana penilaian kinerja pengelola aset keuangan (sebagai contoh, apakah penilaian kinerja berdasarkan nilai wajar dari aset yang dikelola atau arus kas kontraktual yang diperoleh).

Aset keuangan yang dimiliki untuk diperdagangkan atau dikelola dan penilaian kinerjanya berdasarkan nilai wajar diukur pada nilai wajar melalui laba rugi.

Derivatif juga dikategorikan dalam kelompok ini, kecuali derivatif yang ditetapkan sebagai instrumen lindung nilai efektif.

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga

Untuk tujuan penilaian ini, pokok didefinisikan sebagai nilai wajar dari aset keuangan pada saat pengakuan awal. Bunga didefinisikan sebagai imbalan untuk nilai waktu atas uang dan risiko kredit terkait jumlah pokok terutang pada periode waktu tertentu dan juga risiko dan biaya peminjaman standar, dan juga margin laba.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(i) Classification (continued)

Evaluation of business models

The business model is determined at a level that reflects how groups of financial assets are managed together to achieve certain business objectives.

The evaluation of the business model is carried out by considering, but not limited to, the following:

- *How the performance of the business model and financial assets held in the business model are evaluated and reported to the Group's key management personnel;*
- *What risks affect the performance of the business model (including financial assets held in the business model) and specifically how the financial assets are managed; and*
- *How to evaluate the performance of managers of financial assets (for example, whether performance appraisals are based on the fair value of the assets being managed or the contractual cash flows obtained).*

Financial assets held for trading or managed and which performance appraisals based on fair value are measured at fair value through profit or loss.

Derivatives are also categorised under this classification, unless they are designated as effective hedging instruments.

Evaluation of contractual cash flows obtained solely from payment of principal and interest

For the purpose of this evaluation, principal is defined as the fair value of financial assets at initial recognition. Interest is defined as compensation for the time value of money and credit risk in relation to the principal amount owed over a certain period of time and also the risk and standard borrowing costs, as well as profit margins.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga (lanjutan)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga dilakukan dengan mempertimbangkan persyaratan kontraktual, termasuk apakah aset keuangan mengandung persyaratan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual. Dalam melakukan penilaian, Grup mempertimbangkan:

- Peristiwa kontinjensi yang akan mengubah waktu atau jumlah arus kas kontraktual;
- Fitur *leverage*;
- Persyaratan pembayaran di muka dan perpanjangan kontraktual;
- Persyaratan mengenai klaim yang terbatas atas arus kas yang berasal dari aset spesifik; dan
- Fitur yang dapat mengubah nilai waktu dari elemen uang.

Liabilitas keuangan diklasifikasikan ke dalam kategori sebagai berikut pada saat pengakuan awal:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi, yang memiliki 2 (dua) sub-klasifikasi, yaitu liabilitas keuangan yang ditetapkan demikian pada saat pengakuan awal dan liabilitas keuangan yang telah diklasifikasikan dalam kelompok diperdagangkan;
- Liabilitas keuangan lain.
  Liabilitas keuangan lainnya merupakan liabilitas keuangan yang tidak dimiliki untuk dijual atau ditentukan sebagai nilai wajar melalui laba rugi saat pengakuan liabilitas.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(i) Classification (continued)

Evaluation of contractual cash flows obtained solely from payment of principal and interest *(continued)*

An assessment of contractual cash flows obtained solely from principal and interest payments is made by considering contractual terms, including whether financial assets contain contractual terms that can change the timing or amount of contractual cash flows. In assessing, the Group considers:

- *Contingency events that will change the timing or amount of contractual cash flow;*
- *Leverage feature;*
- *Terms of advance payment and contractual extension;*
- *Requirements regarding limited claims for cash flows from specific assets; and*
- *Features that can change the time value of money element.*

Financial liabilities are classified into the following categories at initial recognition:

- *Financial liabilities at fair value through profit or loss, which has 2 (two) sub-classifications, i.e. those designated as such upon initial recognition and those classified as held for trading;*
- *Other financial liabilities.*
  Other financial liabilities pertain to financial liabilities that are not held for trading nor designated as at fair value through profit or loss upon recognition of the liability.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(i) Classification (continued)

Kategori yang didefinisikan oleh PSAK 109/ ***Category as defined by SFAS 109***		**Golongan (ditentukan oleh Grup)/** ***Class (as determined by the Group)***	**Subgolongan/** ***Subclasses***
Aset keuangan/ *Financial assets*	Aset keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial assets at fair value through profit or loss*	Efek-efek/*Marketable securities*	
		Obligasi Pemerintah/*Government Bonds*	
		Tagihan derivatif - tidak terkait lindung nilai/*Derivative receivables - non hedging related*	
		Penyertaan saham/*Equity Investment*	
	Aset keuangan yang diukur pada biaya perolehan yang diamortisasi/*Financial assets at amortised cost*	Kas/*Cash*	Kas pada *vendor*/*Cash in vendor*
		Giro pada Bank Indonesia/*Current accounts with Bank Indonesia*	
		Giro pada bank lain/*Current accounts with other banks*	
		Penempatan pada bank lain dan Bank Indonesia/*Placements with other banks and Bank Indonesia*	
		Efek-efek yang dibeli dengan janji dijual kembali/*Securities purchased under agreements to resell*	
		Wesel ekspor dan tagihan lainnya/*Bills and other receivables*	
		Tagihan akseptasi/*Acceptance receivables*	
		Pinjaman yang diberikan/*Loans*	
		Aset lain-lain/*Other assets*	Piutang lain-lain/*Other receivables*
			Piutang bunga/*Interest receivables*
			Lain-lain/*Others*
			Piutang terkait transaksi ATM/ *Receivables related to ATM transactions*
			Piutang premi asuransi/ *Insurance premium receivables*
		Efek-efek/*Marketable securities*	
		Obligasi Pemerintah/*Government Bonds*	
	Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain/*Financial assets at fair value through other comprehensive income*	Efek-efek/*Marketable securities*	
		Obligasi Pemerintah/*Government Bonds*	
		Penyertaan saham/*Equity investments*	

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(i) Classification (continued)

Kategori yang didefinisikan oleh PSAK 109/ ***Category as defined by SFAS 109***		**Golongan (ditentukan oleh Grup)/** ***Class (as determined by the Group)***	**Subgolongan/** ***Subclasses***
Liabilitas keuangan/ *Financial liabilities*	Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial liabilities at fair value through profit or loss*	Liabilitas derivatif - tidak terkait lindung nilai/*Derivative payables - non hedging related*	
	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/ *Financial liabilities at amortised cost*	Liabilitas segera/*Obligation due immediately*	
		Simpanan nasabah/*Deposits from customers*	
		Simpanan dari bank lain/*Deposits from other banks*	
		Efek-efek yang dijual dengan janji dibeli kembali/*Securities sold under agreements to repurchase*	
		Liabilitas akseptasi/*Acceptance payables*	
		Beban yang masih harus dibayar/*Accrued expenses*	
		Liabilitas lain-lain/*Other liabilities*	Setoran jaminan/*Security deposit*
			Utang bunga/*Interest payable*
			Utang nasabah/*Payable to customers*
			Utang ke pemegang polis/ *Obligation to policyholders*
			Utang reasuransi dan komisi/ *Reinsurance payable and commission*
			Lain-lain/*Others*
		Efek-efek yang diterbitkan/*Securities issued*	
		Efek-efek subordinasi/*Subordinated securities*	
		Pinjaman yang diterima/*Borrowings*	
Komitmen pinjaman dan kontrak jaminan keuangan/ *Loan commitment and financial guarantee contract*	Fasilitas kredit yang belum digunakan/*Unused loan facilities (committed)*		
	Letters of credit yang tidak dapat dibatalkan/*Irrevocable letters of credit*		
	Garansi bank yang diberikan/*Bank Guarantees issued*		
	Standby letters of credit		

(ii) Pengakuan awal

a. Pembelian atau penjualan aset keuangan yang memerlukan penyerahan aset dalam kurun waktu yang telah ditetapkan oleh peraturan dan kebiasaan yang berlaku di pasar (pembelian secara reguler) diakui pada tanggal perdagangan, yaitu tanggal Grup berkomitmen untuk membeli atau menjual aset.

b. Aset keuangan dan liabilitas keuangan pada awalnya diukur pada nilai wajarnya. Dalam hal aset keuangan atau liabilitas keuangan tidak diklasifikasikan sebagai nilai wajar melalui laba rugi, nilai wajar tersebut ditambah/dikurangi biaya transaksi yang dapat diatribusikan secara langsung dengan perolehan atau penerbitan aset keuangan atau liabilitas keuangan.

(ii) Initial recognition

a. Purchase or sale of financial assets that requires delivery of assets within a time frame established by regulation or convention in the market (regular purchases) is recognised on the trade date, i.e., the date that the Group commits to purchase or sell the assets.

b. Financial assets and financial liabilities are initially recognised at fair value. For those financial assets or financial liabilities not classified as fair value through profit or loss, the fair value is added/deducted with directly attributable transaction costs to the issuance of financial assets or liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(ii) Pengakuan awal (lanjutan)

Grup, pada pengakuan awal, dapat menetapkan aset keuangan dan liabilitas keuangan tertentu sebagai nilai wajar melalui laba rugi (opsi nilai wajar). Opsi nilai wajar dapat digunakan hanya bila memenuhi ketetapan sebagai opsi nilai wajar tersebut mengurangi atau mengeliminasi ketidakkonsistenan pengukuran dan pengakuan (*accounting mismatch*) yang dapat timbul.

(iii) Pengukuran setelah pengakuan awal

Aset keuangan dalam kelompok aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi diukur pada nilai wajarnya. Aset keuangan kelompok biaya perolehan diamortisasi dan liabilitas keuangan lainnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

(iv) Penghentian pengakuan

a. Aset keuangan dihentikan pengakuannya jika:

- Hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir; atau
- Grup telah mentransfer haknya untuk menerima arus kas yang berasal dari aset tersebut atau menanggung liabilitas untuk membayarkan arus kas yang diterima tersebut secara penuh tanpa penundaan berarti kepada pihak ketiga dibawah kesepakatan pelepasan, dan antara (a) Grup telah mentransfer secara substansial seluruh risiko dan manfaat atas aset, atau (b) Grup tidak mentransfer maupun tidak memiliki secara substansial seluruh risiko dan manfaat atas aset, tetapi telah mentransfer kendali atas aset.

Ketika Grup telah mentransfer hak untuk menerima arus kas dari aset atau telah memasuki kesepakatan pelepasan dan tidak mentransfer serta tidak mempertahankan secara substansial seluruh risiko dan manfaat atas aset atau tidak mentransfer kendali atas aset, aset diakui sebesar keterlibatan Grup yang berkelanjutan atas aset tersebut.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(ii) Initial recognition (continued)

The Group, upon initial recognition, may designate certain financial assets and financial liabilities, at fair value through profit or loss (fair value option). The fair value option is only applied when the application of the fair value option reduces or eliminates the measurement or recognition inconsistencies (accounting mismatch) that would otherwise arise.

(iii) Subsequent measurement

Financial assets at fair value through other comprehensive income and financial assets and financial liabilities at fair value through profit or loss are measured at fair value. Financial assets classified as amortised cost and other financial liabilities measured at amortised cost using the effective interest rate method.

(iv) Derecognition

a. Financial assets are derecognised when:

- *The contractual rights to receive cash flows from the financial assets have expired; or*
- *The Group has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flow in full without material delay to a third party under a 'pass-through' arrangement; and either (a) the Group has transferred substantially all the risks and rewards of the asset, or (b) the Group has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.*

When the Group has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognised to the extent of the Group's continuing involvement in the asset.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(iv) Penghentian pengakuan (lanjutan)

a. Aset keuangan dihentikan pengakuannya jika: (lanjutan)

Pinjaman yang diberikan dihapusbukukan ketika tidak terdapat prospek yang realistis mengenai pengembalian pinjaman atau hubungan normal antara Grup dan debitur telah berakhir. Pinjaman yang tidak dapat dilunasi tersebut dihapusbukukan dengan mendebit cadangan kerugian penurunan nilai.

b. Liabilitas keuangan dihentikan pengakuannya jika liabilitas yang ditetapkan dalam kontrak dilepaskan atau dibatalkan atau kadaluarsa.

Jika suatu liabilitas keuangan yang ada digantikan dengan liabilitas yang lain oleh pemberi pinjaman yang sama pada keadaan yang secara substansial berbeda, atau berdasarkan suatu liabilitas yang ada yang secara substansial telah diubah, maka pertukaran atau modifikasi tersebut diperlakukan sebagai penghentian pengakuan liabilitas awal dan pengakuan liabilitas baru, dan perbedaan nilai tercatat masing-masing diakui dalam laporan laba rugi.

(v) Pengakuan pendapatan dan beban

a. Pendapatan dan beban bunga atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain serta aset keuangan dan liabilitas keuangan yang dicatat berdasarkan biaya perolehan diamortisasi, diakui pada laporan laba rugi dengan menggunakan metode suku bunga efektif.

Jumlah tercatat bruto aset keuangan adalah biaya perolehan diamortisasi aset keuangan sebelum disesuaikan dengan cadangan penurunan nilai.

Dalam menghitung pendapatan dan beban bunga, tingkat bunga efektif diterapkan pada jumlah tercatat bruto aset (ketika aset tersebut bukan aset keuangan memburuk) atau terhadap biaya perolehan diamortisasi dari liabilitas.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(iv) Derecognition (continued)

a. Financial assets are derecognised when: (continued)

Loans are written off when there is no realistic prospect of collection in the near future or the normal relationship between the Group and the borrowers have ceased to exist. When a loan is deemed uncollectible, it is written off against the related allowance for impairment losses.

b. Financial liabilities are derecognised when the obligation under the liability is discharged or cancelled or has expired.

Where an existing financial liability is replaced by another liability from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the profit or loss.

(v) Income and expense recognition

a. Interest income and expense on financial assets measured at fair value through other comprehensive income as well as financial assets and financial liabilities recorded at amortised cost are recognised in the statement of profit or loss using the effective interest rate method.

The gross carrying amount of a financial asset is the amortised cost of a financial asset before adjusting for allowance for impairment.

In calculating interest income and expenses, the effective interest rate is applied to the gross carrying amount of an asset (when the asset is not an impaired financial asset) or to the amortised cost of a liability.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(v) Pengakuan pendapatan dan beban (lanjutan)

b. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar atas aset keuangan yang diklasifikasikan dalam kelompok nilai wajar melalui penghasilan komprehensif lain diakui secara langsung dalam laporan laba rugi dan penghasilan komprehensif lain (merupakan bagian dari ekuitas), sampai aset keuangan tersebut dihentikan pengakuannya atau adanya penurunan nilai, kecuali keuntungan atau kerugian akibat perubahan nilai tukar untuk instrumen utang.

Pada saat aset keuangan dihentikan pengakuannya atau dilakukan penurunan nilai, keuntungan atau kerugian kumulatif yang sebelumnya diakui dalam ekuitas harus diakui pada laporan laba rugi.

(vi) Reklasifikasi aset keuangan

Grup mereklasifikasi aset keuangan jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

Reklasifikasi aset keuangan dari klasifikasi biaya perolehan yang diamortisasi ke klasifikasi nilai wajar melalui laba rugi dicatat sebesar nilai wajarnya. Selisih antara nilai tercatat dengan nilai wajar diakui sebagai keuntungan atau kerugian pada laba rugi dan penghasilan komprehensif lain.

Reklasifikasi aset keuangan dari klasifikasi biaya perolehan yang diamortisasi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat sebesar nilai wajarnya.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui penghasilan komprehensif lain ke klasifikasi nilai wajar melalui laba rugi dicatat pada nilai wajarnya. Keuntungan atau kerugian yang belum direalisasi direklasifikasi ke laba rugi.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(v) Income and expense recognition (continued)

b. Gains and losses arising from changes in the fair value of financial assets that classified as fair value through statement of profit or loss and other comprehensive income are recognised directly in other comprehensive income (as part of equity), until the financial asset is derecognised or impaired, except gain or loss arising from changes in exchange rate for debt instruments.

When a financial asset is derecognised or impaired, the cumulative gains or losses previously recognised in equity are recognised in profit or loss.

(vi) Reclassification of financial assets

The Group reclassifies financial assets if and only if, the business model for managing financial assets changes.

Reclassifications of financial assets from amortised cost classifications to fair value through profit or loss are recorded at fair value. The difference between the recorded value and fair value is recognised in profit or loss on the statement of profit or loss and other comprehensive income.

Reclassifications of financial assets from amortised cost classifications to fair value classifications through other comprehensive are recorded at their fair values.

Reclassification of financial assets from fair value through other comprehensive income to fair value through profit or loss is recorded at fair value. Unrealised gains or losses are reclassified to profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(vi) Reklasifikasi aset keuangan (lanjutan)

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui penghasilan komprehensif lain ke klasifikasi biaya perolehan yang diamortisasi dicatat pada nilai wajarnya pada tanggal reklasifikasi. Keuntungan atau kerugian yang belum direalisasi dihapus dari ekuitas dan disesuaikan terhadap nilai wajar.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada nilai wajar.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi biaya perolehan yang diamortisasi dicatat pada nilai wajar.

(vii) Saling hapus

Aset keuangan dan liabilitas keuangan saling hapus buku dan nilai netonya disajikan dalam laporan posisi keuangan konsolidasian jika, dan hanya jika Grup memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan adanya maksud untuk menyelesaikan secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara bersamaan.

Hak yang berkekuatan hukum harus tidak kontinjen atas peristiwa di masa depan dan harus dapat dipaksakan di dalam situasi bisnis yang normal, peristiwa kegagalan atau kebangkrutan dari Grup atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah neto hanya jika diperkenankan oleh standar akuntansi.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(vi) Reclassification of financial assets (continued)

Reclassification of financial assets from fair value through other comprehensive income to the amortised cost is recorded at fair value at the date of reclassification. Unrealised gains or losses is removed from equity and is adjusted against the fair value.

Reclassifications on financial assets from fair value through profit or loss to fair value through other comprehensive income are recorded at fair value.

Reclassification of financial assets from fair value through profit or loss to amortised cost classification is recorded at fair value.

(vii) Offsetting

Financial assets and liabilities are set off and the net amount is presented in the consolidated statement of financial position when, and only when, the Group has a legal right to set off the amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Group or the counterparty.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(viii) Pengukuran biaya diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset keuangan atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok pinjaman, ditambah atau dikurangi amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai pengakuan awal dan nilai jatuh temponya, dan dikurangi penurunan nilai.

(ix) Pengukuran nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam suatu transaksi teratur antara pelaku pasar pada tanggal pengukuran.

Jika tersedia, Grup mengukur nilai wajar dari suatu instrumen dengan menggunakan harga kuotasi di pasar aktif untuk instrumen terkait. Suatu pasar dianggap aktif bila harga yang dikuotasikan tersedia sewaktu-waktu dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service or regulatory agency*), dan merupakan transaksi pasar aktual dan teratur terjadi yang dilakukan secara wajar. Nilai wajar dapat diperoleh dari *Interdealer Market Association (IDMA)* atau harga pasar atau harga yang diberikan oleh *broker* (*quoted price*) dari *Bloomberg* atau *Reuters* pada tanggal pengukuran.

Jika pasar untuk instrumen keuangan tidak aktif, Grup menetapkan nilai wajar dengan menggunakan teknik penilaian.

Grup menggunakan beberapa teknik penilaian yang digunakan secara umum untuk menentukan nilai wajar dari instrumen keuangan dengan tingkat kompleksitas yang rendah, seperti opsi nilai tukar dan *swap* mata uang. Input yang digunakan dalam teknik penilaian untuk instrumen keuangan di atas adalah data pasar yang diobservasi.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(viii) Amortised cost measurement

The amortised cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal repayments, plus or minus the cumulative amortization using the effective interest rate method of any difference between the initial amount recognised and the maturity amount, minus any reduction for impairment.

(ix) Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at measurement date.

When available, the Group measures the fair value of an instrument using quoted prices in an active market for that instrument. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency and those prices represent actual and regularly occurring market transaction on an arm's length basis. The fair value can be obtained from IDMA's (Interdealer Market Association) or quoted market prices or broker's quoted price from Bloomberg or Reuters on the measurement date.

If a market for a financial instrument is not active, the Group establishes fair value using a valuation technique.

The Group uses widely recognised valuation models for determining fair values of financial instruments of lower complexity, such as exchange value options and currency swaps. For these financial instruments, inputs into models are generally market-observable data.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(ix) Pengukuran nilai wajar (lanjutan)

Untuk instrumen yang lebih kompleks, Grup menggunakan model penilaian internal, yang pada umumnya berdasarkan teknik dan metode penilaian yang umumnya diakui sebagai standar industri. Model penilaian terutama digunakan untuk menilai kontrak derivatif yang ditransaksikan melalui pasar *over-the-counter*, *unlisted debt securities* (termasuk surat utang dengan derivatif melekat) dan instrumen utang lainnya yang pasarnya tidak aktif.

Untuk instrumen keuangan yang tidak mempunyai harga pasar, estimasi atas nilai wajar efek-efek ditetapkan dengan mengacu pada nilai wajar instrumen lain yang substansinya sama atau dihitung berdasarkan arus kas yang diharapkan terhadap aset bersih efek-efek tersebut.

Hasil dari suatu teknik penilaian merupakan sebuah estimasi atau perkiraan dari suatu nilai yang tidak dapat ditentukan dengan pasti, dan teknik penilaian yang digunakan mungkin tidak dapat menggambarkan seluruh faktor yang relevan atas posisi yang dimiliki Grup. Dengan demikian, penilaian disesuaikan dengan faktor tambahan seperti *model risk*, risiko likuiditas dan risiko kredit *counterparty*. Berdasarkan kebijakan teknik penilaian nilai wajar, pengendalian dan prosedur yang diterapkan, manajemen berkeyakinan bahwa penyesuaian atas penilaian tersebut di atas diperlukan dan dianggap tepat untuk menyajikan secara wajar nilai dari instrumen keuangan yang diukur berdasarkan nilai wajar dalam laporan posisi keuangan konsolidasian. Data harga dan parameter yang digunakan di dalam prosedur pengukuran pada umumnya telah ditelaah dan disesuaikan jika diperlukan, khususnya untuk perkembangan atas pasar terkini.

Nilai wajar atas pinjaman yang diberikan dan piutang, serta liabilitas kepada bank dan nasabah ditentukan menggunakan nilai berdasarkan arus kas kontraktual, dengan mempertimbangkan kualitas kredit, likuiditas dan biaya.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(ix) Fair value measurement (continued)

For more complex instruments, the Group uses internally developed models, which are usually based on valuation methods and techniques generally recognised as standard within the industry. Valuation models are used primarily to value derivatives transacted in the over-the-counter market, unlisted debt securities (including those debt with embedded derivatives) and other debt instruments for which markets were or have become inactive.

For financial instruments with no quoted market price, a reasonable estimate of the fair value is determined by reference to the fair value of another instrument which substantially has the same characteristics or calculated based on the expected cash flows of the underlying net asset base of the marketable securities.

The output of a valuation technique is an estimation or approximation of a value that cannot be determined with certainty, and the valuation technique employed may not fully reflect all factors relevant to the positions that the Group holds. Valuations are therefore adjusted, with additional factors such as model risk, liquidity risk and counterparty credit risk. Based on the established fair value valuation technique policy, related controls and procedures applied, management believes that these valuation adjustments are necessary and considered appropriate to fairly state the values of financial instruments measured at fair value in the consolidated statement of financial position. Price data and parameters used in the measurement procedures applied are generally reviewed and adjusted, if necessary, particularly in view of the current market developments.

The fair value for loans and receivables as well as liabilities to banks and customers are determined using a present value model on the basis of contractually agreed cash flows, taking into account credit quality, liquidity and costs.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(ix) Pengukuran nilai wajar (lanjutan)

Semua aset dan liabilitas dimana nilai wajar diukur atau diungkapkan dalam laporan keuangan konsolidasian dapat dikategorikan pada level hirarki nilai wajar, berdasarkan tingkatan sebagai berikut:

- Tingkat 1: Harga kuotasian (tidak disesuaikan) dari pasar aktif untuk aset atau liabilitas yang identik.
- Tingkat 2: Input selain harga yang dikutip dari pasar yang disertakan pada Tingkat 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung (yaitu sebagai suatu harga) atau secara tidak langsung (sebagai turunan dari harga).
- Tingkat 3: Input untuk aset atau liabilitas yang tidak didasarkan pada data pasar yang dapat diobservasi (informasi yang tidak dapat diobservasi).

(x) Cadangan kerugian penurunan nilai atas aset keuangan

- Grup mengakui penyisihan kerugian kredit ekspektasian pada instrumen keuangan yang tidak diukur pada nilai wajar melalui laba rugi.

- Tidak ada penyisihan kerugian kredit ekskpektasian pada investasi instrumen ekuitas.

- Grup mengukur cadangan kerugian sejumlah kerugian kredit ekspektasian sepanjang umurnya, kecuali untuk hal berikut, diukur sejumlah kerugian kredit ekspektasian 12 bulan:

  - instrumen utang yang memiliki risiko kredit rendah pada tanggal pelaporan; dan
  - instrumen keuangan lainnya yang risiko kreditnya tidak meningkat secara signifikan sejak pengakuan awal.

Grup menganggap instrumen utang memiliki risiko kredit yang rendah ketika peringkat risiko kreditnya setara dengan definisi *investment grade*.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(ix) Fair value measurement (continued)

All assets and liabilities which fair value is measured or disclosed in the consolidated financial statements can be classified in fair value hierarchy levels, based on following level:

- *Level 1: Quoted price (unadjusted) in active markets for identical assets or liabilities.*
- *Level 2: Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (as a price) or indirectly (as derived from price).*

- *Level 3: Input for asset or liability based on unobservable inputs for the asset or liability.*

(x) Allowance for impairment losses on financial assets

- *The Group recognises the allowance for expected credit losses on financial instruments that are not measured at fair value through profit or loss.*

- *There is no allowance for expected credit losses on investment in equity instruments.*

- *The Group measure the allowance for losses for the lifetime of an expected credit losses, except for the following, which are measured according to 12 months expected credit losses:*
  - *debt instruments that have low credit risk at the reporting date; and*
  - *other financial instruments for which credit risk has not increased significantly since initial recognition.*

The Group considers debt instruments to have low credit risk when the credit risk rating is at par with the definition of investment grade.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Kerugian kredit ekspektasian 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan kerugian kredit ekspektasian yang timbul dari peristiwa gagal bayar instrumen keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan.

Pengukuran Kerugian Kredit Ekspektasian

Kerugian Kredit Ekspektasian adalah estimasi probabilitas tertimbang dari kerugian kredit yang diukur sebagai berikut:

- aset keuangan yang tidak memburuk pada tanggal pelaporan, kerugian kredit ekspektasian diukur sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu 12 bulan sejak tanggal pelaporan. Kredit ekspektasian terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka kerugian kredit ekspektasian dihitung kembali berdasarkan basis 12 bulan;
- aset keuangan yang memburuk pada tanggal pelaporan, kerugian kredit ekspektasian diukur sebesar selisih antara jumlah tercatat bruto dan nilai kini arus kas masa depan yang diestimasi;
- komitmen pinjaman yang belum ditarik, kerugian kredit ekspektasian diukur sebesar selisih antara nilai kini jumlah arus kas jika komitmen ditarik dan arus kas yang diperkirakan akan diterima oleh Grup;
- kontrak jaminan keuangan, kerugian kredit ekspektasian diukur sebesar selisih antara pembayaran yang diperkirakan untuk mengganti pemegang atas kerugian kredit yang terjadi dikurangi jumlah yang diperkirakan dapat dipulihkan.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(x) Allowance for impairment losses on financial assets (continued)

The 12-month expected credit loss is part of the expected credit loss throughout its lifetime that represents an expected credit loss arising from a default on financial instruments that might occur 12 months after reporting date.

Measurement of Expected Credit Losses

Expected Credit Loss is an estimate of the weighted probability of a credit loss measured as follows:

- *financial assets that do not deteriorate at the reporting date, the expected credit loss is measured at the lifetime cash shortfalls arising from possible default events up to 12 months into the future from the reporting date. Expected credit losses continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, expected credit losses will revert to being determined on a 12-month basis;*
- *financial assets that deteriorate at the reporting date, the expected credit loss is measured at the difference between the gross carrying amount and the present value of estimated future cash flows;*
- *for undisbursed loan commitments, expected credit losses are measured at the difference between the present value of the amount of cash flow if the commitments is withdrawn and the cash flow expected to be received by the Group;*
- *for financial guarantee contracts, expected credit losses are measured at the difference between the estimated payments to replace the holder for the credit losses incurred less the amount estimated to be recoverable.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset Keuangan yang Direstrukturisasi

Jika ketentuan aset keuangan dinegosiasikan ulang atau dimodifikasi atau aset keuangan yang ada diganti dengan yang baru karena kesulitan keuangan peminjam, maka dilakukan penilaian apakah aset keuangan yang ada harus dihentikan pengakuannya dan kerugian kredit ekspektasian diukur sebagai berikut:

- Apabila syarat-syarat tersebut berbeda secara substansial, Grup menghentikan pengakuan aset keuangan awal dan mengakui aset keuangan yang 'baru' pada nilai wajarnya dan menghitung kembali suku bunga efektif yang baru untuk aset tersebut. Tanggal renegosiasi syarat pinjaman dianggap sebagai tanggal pengakuan awal untuk keperluan perhitungan penurunan nilai, termasuk untuk menentukan apakah terdapat kenaikan signifikan risiko kredit. Namun, Grup juga menilai apakah aset keuangan baru dianggap sebagai aset keuangan yang mengalami penurunan nilai pada pengakuan awal, terutama dalam keadaan dimana renegosiasi didorong oleh peminjam yang tidak dapat melakukan pembayaran yang sudah disetujui sebelumnya. Selisih dari nilai tercatat juga diakui pada laporan laba rugi konsolidasian di pembentukan cadangan kerugian penurunan nilai sebagai laba rugi dari penghentian pengakuan aset keuangan. Untuk Grup, bila kerugian berelasi dengan risiko kredit, Grup mengklasifikasikan kerugian ke dalam pembentukan cadangan kerugian penurunan nilai.
- Apabila syarat-syarat tersebut tidak berbeda secara substansial, renegosiasi atau modifikasi tidak menghasilkan penghentian pengakuan, dan Grup menghitung kembali nilai tercatat bruto berdasarkan arus kas yang sudah dimodifikasi dari aset keuangan dan mengakui laba atau rugi modifikasi di laporan laba rugi konsolidasian. Nilai tercatat bruto yang baru dihitung kembali dengan mendiskontokan arus kas yang telah dimodifikasi dengan menggunakan tingkat suku bunga efektif awal.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Restructured Financial Assets

If the terms of the financial assets are renegotiated or modified or the existing financial assets are replaced with new ones due to the borrower's financial difficulties, an assessment is made whether recognition of existing financial assets must be derecognised and expected credit losses measured as follows:

- *If the terms are substantially different, the Group derecognises the original financial asset and recognises a 'new' asset at fair value and recalculates a new effective interest rate for the asset. The date of renegotiation is consequently considered to be the date of initial recognition for impairment calculation purposes, including for the purpose of determining whether a significant increase in credit risk has occurred. However, the Group also assesses whether the new financial asset recognised is deemed to be credit-impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences in the carrying amount are also recognised in the consolidated statement of profit or loss in allowance for impairment losses as a gain or loss on derecognition. For the Group, to the extent that the loss does relate to credit risk, the Group classifies that loss within allowance for impairment losses.*
- *If the terms are not substantially different, the renegotiation or modification does not result in derecognition, and the Group recalculates the gross carrying amount based on the revised cash flows of the financial asset and recognises a modification gain or loss in consolidated statements of profit or loss. The new gross carrying amount is recalculated by discounting the modified cash flows at the original effective interest rate.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset Keuangan yang Memburuk

Pada setiap tanggal pelaporan, Grup menilai apakah aset keuangan yang dicatat pada biaya perolehan diamortisasi dan aset keuangan instrumen utang yang dicatat pada nilai wajar melalui penghasilan komprehensif lain mengalami penurunan nilai kredit (memburuk). Aset keuangan memburuk ketika satu atau lebih peristiwa yang memiliki dampak merugikan atas estimasi arus kas masa depan dari aset keuangan telah terjadi.

Bukti bahwa aset keuangan mengalami penurunan nilai kredit (memburuk) termasuk data yang dapat diobservasi mengenai peristiwa berikut ini:

- kesulitan keuangan signifikan yang dialami penerbit atau pihak peminjam;
- pelanggaran kontrak, seperti peristiwa gagal bayar atau peristiwa tunggakan;
- pihak pemberi pinjaman, untuk alasan ekonomi atau kontraktual sehubungan dengan kesulitan keuangan yang dialami pihak peminjam, telah memberikan konsesi pada pihak peminjam yang tidak mungkin diberikan jika pihak peminjam tidak mengalami kesulitan tersebut;
- terjadi kemungkinan bahwa pihak peminjam akan dinyatakan pailit atau melakukan reorganisasi keuangan lainnya;
- hilangnya pasar aktif dari aset keuangan akibat kesulitan keuangan; atau
- pembelian atau penerbitan aset keuangan dengan diskon sangat besar yang mencerminkan kerugian kredit yang terjadi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Credit-impaired Financial Assets

At each reporting date, the Group assesses whether the financial assets recorded at amortised cost and the debt instrument financial assets which are recorded at fair value through other comprehensive income are credit-impaired (worsening). Financial assets deteriorate when one or more events that have an adverse effect on the estimated future cash flows of the financial assets have occurred.

Evidence that financial assets become credit impaired including observable data regarding the following events:

- *significant financial difficulties experienced by the issuer or the borrower;*
- *breach of contract, such as a default or arrears;*
- *the lender, for economic or contractual reasons in relation to the financial difficulties experienced by the borrower, has given concessions to the borrower which is not possible if the borrower does not experience such difficulties;*
- *it is probable that the borrower will enter bankruptcy or the other financial reorganization;*
- *loss of an active market for financial assets due to financial difficulties; or*
- *purchase or issuance of financial asset at significant discount which reflect the credit loss that occurs.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset Keuangan yang dibeli atau yang berasal dari aset keuangan memburuk - POCI

Aset keuangan dikategorikan sebagai POCI apabila terdapat bukti objektif penurunan nilai pada saat pengakuan awal. Pada saat pengakuan awal, tidak ada penyisihan kerugian kredit yang diakui karena harga pembelian atau nilainya telah termasuk estimasi kerugian kredit sepanjang umurnya. Selanjutnya, setiap perubahan kerugian kredit ekspektasian sepanjang umurnya akan diakui sebagai keuntungan atau kerugian penurunan nilai dalam laporan laba rugi konsolidasian.

Penyajian Penyisihan Kerugian Kredit Ekspektasian Dalam Laporan Posisi Keuangan Konsolidasian

Penyisihan kerugian kredit ekspektasian disajikan dalam laporan posisi keuangan konsolidasian sebagai berikut:

- aset keuangan yang diukur pada biaya perolehan diamortisasi, penyisihan kerugian kredit ekspektasian disajikan sebagai pengurang dari jumlah tercatat bruto aset;
- komitmen pinjaman dan kontrak jaminan keuangan, penyisihan kerugian kredit ekspektasian disajikan sebagai provisi;
- instrumen utang yang diukur pada nilai wajar melalui penghasilan komprehensif lain, penyisihan kerugian kredit ekspektasian tidak diakui dalam laporan posisi keuangan karena jumlah tercatat dari aset-aset ini adalah nilai wajarnya. Namun demikian penyisihan kerugian kredit ekspektasian diungkapkan dan diakui dalam penghasilan komprehensif lain.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Purchased or originated credit-impaired financial assets - POCI

Financial assets are categorised as POCI if there is objective evidence of impairment at initial recognition. At initial recognition, no allowance for credit losses is recognised because the purchase price or value has included lifetime estimated credit losses. Subsequently, any changes in the lifetime expected credit losses will be recognised as an impairment gain or loss in the consolidated statement of profit or loss.

Presentation of Allowance for Expected Credit Losses in the Statement of Consolidated Financial Position

Allowance for expected credit losses is presented in the statement of consolidated financial positions as follows:

- *for financial assets measured at amortised cost, allowance for expected credit losses is presented as a deduction from the gross carrying amount of the asset;*
- *for loan commitments and financial guarantee contracts, allowance for expected credit losses is presented as a provision;*
- *for debt instruments measured at fair value through other comprehensive income, allowance for expected credit losses are not recognised in the statement of financial position because the carrying amounts of these assets are at their fair values. However, allowance for expected credit losses is disclosed and recognised in other comprehensive income.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Perhitungan penurunan nilai secara individual

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara individual, dengan ketentuan sebagai berikut:

a. Pinjaman yang diberikan Segmen Korporasi dan Menengah yang memenuhi kriteria:
   - Memiliki umur tunggakan lebih dari 90 hari (kolektibilitas 3-5); atau
   - Memiliki *rating default* (*rating* 20-23); atau
   - Memiliki *rating non-investment grade* (*rating* 13-19) dan dilakukan restrukturisasi (kecuali untuk restrukturisasi Covid-19).
b. Pinjaman yang diberikan Segmen Kecil dan Konsumer yang memiliki maksimum lebih besar atau sama dengan Rp15 miliar (nilai penuh) yang memenuhi kriteria:
   - Memiliki umur tunggakan lebih dari 90 hari (kolektibilitas 3-5); atau
   - Dilakukan restrukturisasi (kecuali untuk restrukturisasi Covid-19).

Perhitungan penurunan nilai secara kolektif

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara kolektif, jika memenuhi salah satu kriteria di bawah ini:

a. Pinjaman yang diberikan yang secara individual memiliki nilai tidak signifikan; atau
b. Pinjaman yang diberikan yang direstrukturisasi yang secara individual memiliki nilai tidak signifikan.

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan

Ketika pinjaman yang diberikan tidak tertagih, pinjaman yang diberikan tersebut dihapusbuku dengan menjurnal balik cadangan kerugian penurunan nilai. Pinjaman yang diberikan tersebut dapat dihapus buku setelah semua prosedur yang diperlukan telah dilakukan dan jumlah kerugian telah ditentukan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Individual impairment calculation

The Bank determines that loans should be evaluated for impairment through individual evaluation with the following criteria:

a. Loans for Corporate and Middle Segment that meet the criteria:
   - *Has overdue age more than 90 days (collectability 3-5); or*
   - *Has a default rating (rating 20-23); or*
   - *Has a non-investment grade rating (rating 13-19) and is undergoing restructuring (except for restructuring Covid-19).*

b. Loans for Small and Consumer Segment with the maximum of more than or equal to Rp15 billion (full amount) that meet the criteria:
   - *Has overdue age more than 90 days (collectability 3-5); or*
   - *Has been restructured (except for restructuring Covid-19).*

Collective impairment calculation

The Bank determines loans to be evaluated for impairment through collective evaluation if one of the following criteria is met:

a. Loans which individually have insignificant value; or

b. Restructured loans which individually have insignificant value.

Recoveries of written-off financial assets

When a loan is uncollectible, it is written-off against the related allowance for impairment loss. Such loans are written off after all the necessary procedures have been completed and the amount of the loss has been determined.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan (lanjutan)

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan pada tahun berjalan dikreditkan dengan menyesuaikan akun cadangan kerugian penurunan nilai. Penerimaan kembali atas aset keuangan yang telah dihapusbukukan dicatat sebagai pendapatan operasional selain pendapatan bunga.

d. Prinsip konsolidasian

Laporan keuangan konsolidasian meliputi laporan keuangan BNI beserta seluruh Entitas Anak yang berada di bawah pengendalian BNI. Entitas anak adalah seluruh entitas (termasuk entitas terstruktur) dimana Grup memiliki pengendalian.

Dalam hal pengendalian terhadap Entitas Anak dimulai atau diakhiri dalam suatu tahun berjalan, maka hasil usaha Entitas Anak yang diperhitungkan ke dalam laporan keuangan konsolidasian hanya sebatas hasil pada saat pengendalian tersebut mulai diperoleh atau hingga saat pengendalian itu berakhir.

Pengendalian didapat ketika BNI terekspos atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas Entitas Anak.

BNI mengendalikan Entitas Anak, jika dan hanya jika, BNI memiliki hal berikut ini:

a) kekuasaan atas Entitas Anak (hak yang ada saat ini yang memberi kemampuan kini untuk mengarahkan aktivitas relevan yang secara signifikan mempengaruhi imbal hasil Entitas Anak);
b) eksposur atau hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak; dan
c) kemampuan untuk menggunakan kekuasaannya atas Entitas Anak untuk mempengaruhi jumlah imbal hasil Entitas Anak.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(x) Allowance for impairment losses on financial assets (continued)

Recoveries of written-off financial assets *(continued)*

The recoveries of written-off financial assets in the current year are credited by adjusting the allowance for impairment losses accounts. Recoveries of written-off financial assets are recorded as operating income other than interest income.

d. Principles of consolidation

The consolidated financial statements include the financial statements of BNI and all its Subsidiaries that are controlled by BNI. Subsidiaries are all entities (including structured entities) over which the Group has control.

Where Subsidiaries either began or ceased to be controlled during the year, the results of operations of those Subsidiaries are included in the consolidated financial statements only from the date that the control has commenced or up to the date that the control has ceased.

Control is acquired when BNI is exposed or has rights to variable returns from its involvement with Subsidiaries and has the ability to affect those returns through its power over Subsidiaries.

BNI controls a Subsidiary if, and only if, BNI has the following:

a) power over a Subsidiary (existing rights that provide the current ability to direct the relevant activities that significantly affect returns of a Subsidiary);

b) exposure, or rights to variable returns from its involvement with the Subsidiary; and

c) the ability to use its power over the Subsidiary to affect the amount of the Subsidiary's returns.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Bila Grup tidak memiliki hak suara atau hak serupa secara mayoritas atas suatu Entitas Anak, Grup mempertimbangkan semua fakta dan keadaan yang relevan dalam mengevaluasi apakah mereka memiliki kekuasaan atas Entitas Anak, termasuk:

i) Pengaturan kontraktual dengan pemilik hak suara lainnya dari Entitas Anak,
ii) Hak yang timbul atas pengaturan kontraktual lain, dan
iii) Hak suara dan hak suara potensial yang dimiliki Grup.

Grup menilai kembali apakah mereka mengendalikan Entitas Anak bila fakta dan keadaan mengindikasikan adanya perubahan terhadap satu atau lebih dari ketiga elemen dari pengendalian. Konsolidasi atas Entitas Anak dimulai sejak Grup memperoleh pengendalian atas Entitas Anak dan tidak lagi mengkonsolidasikan ketika Grup kehilangan pengendalian atas Entitas Anak. Aset, liabilitas, penghasilan dan beban dari Entitas Anak yang diakuisisi pada tahun tertentu disertakan dalam laporan keuangan konsolidasian sejak tanggal Grup memperoleh kendali sampai tanggal Grup tidak lagi mengendalikan Entitas Anak tersebut.

Kombinasi bisnis dicatat dengan menggunakan metode akuisisi. Imbalan yang diserahkan untuk akuisisi suatu entitas anak adalah sebesar nilai wajar aset yang diserahkan, saham yang diterbitkan atau liabilitas yang diakui pada tanggal akuisisi. Kelebihan jumlah imbalan yang dialihkan dan nilai wajar jumlah kepentingan non-pengendali atas jumlah aset teridentifikasi bersih yang diperoleh dan kewajiban yang timbul dicatat sebagai *goodwill*. Jika jumlah imbalan yang diserahkan lebih rendah dari nilai wajar aset bersih entitas anak yang diakuisisi, selisihnya diakui langsung dalam laporan laba rugi konsolidasian.

Jika akuntansi awal untuk kombinasi bisnis belum selesai pada akhir periode pelaporan saat kombinasi terjadi, Grup melaporkan jumlah sementara untuk pos-pos yang proses akuntansinya belum selesai dalam laporan keuangannya. Selama periode pengukuran, pihak pengakuisisi menyesuaikan, aset atau liabilitas tambahan yang diakui, untuk mencerminkan informasi baru yang diperoleh tentang fakta dan keadaan yang ada pada tanggal akuisisi dan, jika diketahui, akan berdampak pada jumlah yang diakui pada tanggal tersebut.

2. MATERIAL ACCOUNTING POLICY INFORMATION (continued)

d. Principles of consolidation *(continued)*

When the Group has less than a majority of the voting or similar rights of a Subsidiary, the Group considers all relevant facts and circumstances in assessing whether it has power over a Subsidiary, including:

i) The contractual arrangement with the other vote holders of the Subsidiary,
ii) Rights arising from other contractual arrangements, and
iii) The Group's voting rights and potential voting rights.

The Group re-assesses whether or not it controls a Subsidiary if facts and circumstances indicate that there are changes to one or more of the three elements of control. Consolidation of a Subsidiary begins when the Group obtains control over the Subsidiary and ceases when the Group loses control of the Subsidiary. Assets, liabilities, income and expenses of a Subsidiary acquired during the year are included in the consolidated financial statements from the date the Group obtains the control up to the date of the Group ceases the control the Subsidiary.

The acquisition method is used to account for business combinations. The consideration transferred for the acquisition of a subsidiary is the fair value of the assets given, shares issued or liabilities incurred at the date of acquisition. The excess of the aggregate of the consideration transferred and the fair value of non-controlling interest over the net identifiable assets acquired and liabilities is recorded as goodwill. If this consideration is lower than the fair value of the net assets of the subsidiary acquired, the difference is recognised directly in the consolidated profit or loss.

If the initial accounting of a business combination is incomplete by the end of the reporting period in which the combination occurs, the Group reports provisional amounts for the items for which the accounting is incomplete. Those provisional amounts are adjusted during the measurement period, or additional assets or liabilities are recognised, to reflect new information obtained about facts and circumstances that existed as of the acquisition date that, if known, would have affected the amount recognised as of that date.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Untuk setiap akuisisi, Grup mengakui kepentingan non-pengendali pada pihak yang diakuisisi baik sebesar nilai wajar atau sebesar bagian proporsional kepentingan non-pengendali atas aset bersih pihak yang diakuisisi. Kepentingan non-pengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian, terpisah dari ekuitas pemilik entitas induk.

Biaya terkait akuisisi dibebankan pada saat terjadinya.

Seluruh saldo dan transaksi termasuk keuntungan/kerugian yang belum direalisasi antara BNI dan Entitas Anak yang signifikan dieliminasi untuk mencerminkan posisi keuangan dan hasil usaha konsolidasian BNI dan Entitas Anak sebagai satu kesatuan usaha.

Laporan keuangan konsolidasian disusun dengan menggunakan kebijakan akuntansi yang sama untuk peristiwa dan transaksi sejenis dalam kondisi yang sama. Apabila laporan keuangan Entitas Anak menggunakan kebijakan akuntansi yang berbeda dari kebijakan akuntansi yang digunakan dalam laporan keuangan konsolidasian, maka dilakukan penyesuaian yang diperlukan terhadap laporan keuangan Entitas Anak tersebut.

Kepentingan non-pengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham non-pengendali atas laba tahun berjalan dan ekuitas Entitas Anak tersebut sesuai dengan persentase kepemilikan pemegang saham non-pengendali pada Entitas Anak tersebut.

Entitas Asosiasi

Entitas asosiasi adalah seluruh entitas dimana Grup memiliki pengaruh signifikan namun bukan pengendalian, biasanya melalui kepemilikan hak suara antara 20% dan 50%. Investasi pada entitas asosiasi dicatat dengan metode ekuitas, setelah pada awalnya diakui pada nilai perolehan dikurangi kerugian penurunan nilai, jika ada.

Investasi pada entitas asosiasi pada awalnya diakui sebesar biaya perolehan. Biaya perolehan diukur berdasarkan nilai wajar aset yang diserahkan, instrumen ekuitas yang diterbitkan atau liabilitas yang timbul atau diambil alih pada tanggal akuisisi, ditambah biaya yang berhubungan langsung dengan akuisisi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

The Group recognises any non-controlling interests in the acquiree on an acquisition by acquisition basis, either at fair value or at the non-controlling interest's proportionate share of the acquiree's net assets. Non-controlling interests are reported as equity in the consolidated statement of financial position, separate from the owner of the parent's equity.

Acquisition-related costs are expensed as incurred.

All significant balances and transactions, including unrealised gains/losses among BNI and Subsidiaries are eliminated to reflect the consolidated financial position and results of operations of BNI and its Subsidiaries as a single entity.

The consolidated financial statements are prepared using uniform accounting policies for transactions and events in similar circumstances. If the Subsidiaries' financial statements use accounting policies different from those adopted in the consolidated financial statements, appropriate adjustments are made to the Subsidiaries' financial statements.

The non-controlling interest is presented in the equity of the consolidated statement of financial position and represents the non-controlling stockholders' proportionate share in the income for the year and equity of the Subsidiaries based on the percentage of ownership of the non-controlling stockholders in the Subsidiaries.

Associates

Associates are all entities over which the Group has significant influence but not control, generally accompanying a shareholding between 20% and 50% of the voting rights. Investment in associates are accounted for using the equity method of accounting, after initially being recognised at cost less impairment losses, if any.

Investment in an associate is initially recognised at cost. The cost of an acquisition is measured at the fair value of the assets transferred, equity instruments issued or liabilities incurred or assumed as at the date of acquisition, plus costs directly attributable to the acquisition.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Entitas Asosiasi (lanjutan)

Goodwill pada akuisisi entitas asosiasi merupakan selisih lebih yang terkait dengan biaya perolehan investasi pada entitas asosiasi dengan bagian Grup atas nilai wajar neto aset teridentifikasi dari entitas asosiasi dan dimasukkan dalam jumlah tercatat investasi.

Dalam menerapkan metode ekuitas, bagian Grup atas laba rugi entitas asosiasi setelah perolehan diakui dalam laba rugi, dan bagian Grup atas penghasilan komprehensif lain setelah tanggal perolehan diakui dalam penghasilan komprehensif lain.

Perubahan dan penerimaan distribusi dari entitas asosiasi setelah tanggal perolehan disesuaikan terhadap nilai tercatat investasi.

Jika bagian Grup atas rugi entitas asosiasi sama dengan atau melebihi kepentingannya pada entitas asosiasi, termasuk piutang tidak lancar tanpa jaminan, maka Grup menghentikan pengakuan bagiannya atas rugi lebih lanjut, kecuali Grup memiliki kewajiban untuk melakukan pembayaran atau telah melakukan pembayaran atas nama entitas asosiasi.

Keuntungan yang belum direalisasi atas transaksi antara Grup dengan entitas asosiasi dieliminasi sebesar bagian Grup dalam entitas asosiasi tersebut. Kerugian yang belum direalisasi juga dieliminasi kecuali transaksi tersebut memberikan bukti penurunan nilai atas aset yang ditransfer. Kebijakan akuntansi entitas asosiasi akan disesuaikan, apabila diperlukan, agar konsisten dengan kebijakan Grup.

Dividen yang akan diterima dari entitas asosiasi diakui sebagai pengurang jumlah tercatat investasi.

Pada setiap tanggal pelaporan, Grup menentukan apakah terdapat bukti objektif bahwa telah terjadi penurunan nilai atas investasi pada entitas asosiasi. Jika bukti tersebut ada, maka Grup menghitung besarnya penurunan nilai sebagai selisih antara jumlah yang terpulihkan dan nilai tercatat atas investasi pada entitas asosiasi dan mengakui selisih tersebut pada laba rugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

***Associates** (continued)*

Goodwill on acquisition of an associate represents the excess of the cost of acquisition of the associate over the Group's share of the fair value of the identifiable net assets of the associate and is included in the carrying amount of the investment.

In applying the equity method of accounting, the Group's share of its associate's post-acquisition profit or loss is recognised in profit or loss and its share of post-acquisition other comprehensive income is recognised in other comprehensive income.

These post-acquisition movements and distributions received from an associate are adjusted against the carrying amounts of the investment.

When the Group's share of the losses of an associate equals or exceeds its interest in the associate, including any other unsecured non-current receivables, the Group does not recognise further losses, unless it has obligations to make or has made payments on behalf of the associate.

Unrealised gains on transactions between the Group and its associate are eliminated to the extent of the Group's interest in the associate. Unrealised losses are also eliminated unless the transaction provides evidence of impairment of the asset being transferred. The accounting policies of the associate will be changed where necessary to ensure consistency with the accounting policies adopted by the Group.

Dividend receivables from an associate are recognised as reductions in the carrying amounts of the investment.

The Group determines at each reporting date whether there is any objective evidence that the investment in an associate is impaired. If any such evidence exists, the Group calculates the amount of impairment as the difference between the recoverable amount of the associate and its carrying value and recognises the amount in profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Entitas Asosiasi (lanjutan)

Jika bagian kepemilikan entitas pada entitas asosiasi atau ventura bersama berkurang, tetapi investasi tetap diklasifikasikan masing-masing sebagai entitas asosiasi atau ventura bersama, maka entitas mereklasifikasi ke laba rugi proporsi keuntungan atau kerugian yang telah diakui sebelumnya dalam penghasilan komprehensif lain yang terkait dengan pengurangan bagian kepemilikan tersebut jika keuntungan atau kerugian tersebut disyaratkan untuk direklasifikasi ke laba rugi atas pelepasan aset atau liabilitas yang terkait.

e. Transaksi dalam mata uang asing dan penjabaran

Transaksi dalam mata uang asing

Pos-pos yang disertakan dalam laporan keuangan setiap entitas anggota Grup diukur menggunakan mata uang yang sesuai dengan lingkungan ekonomi utama di mana entitas beroperasi ("mata uang fungsional").

BNI dan Entitas Anak yang berdomisili di Indonesia menyelenggarakan pembukuannya dalam mata uang Rupiah, kecuali untuk BNI Remittance yang pembukuan akuntansinya dilakukan dalam Dolar Amerika Serikat. Transaksi-transaksi dalam mata uang selain Rupiah yang terjadi di sepanjang tahun dicatat dengan nilai kurs yang berlaku pada saat terjadinya transaksi yang bersangkutan.

Laporan keuangan konsolidasian disajikan dalam Rupiah yang merupakan mata uang fungsional BNI.

Pada tanggal laporan posisi keuangan konsolidasian, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke dalam mata uang Rupiah dengan menggunakan kurs tengah *Reuters* pada pukul 15:00 WIB. Keuntungan atau kerugian yang timbul sebagai akibat dari penjabaran aset dan liabilitas moneter dalam mata uang asing dicatat dalam laporan laba rugi konsolidasian tahun berjalan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

***Associates** (continued)*

If an entity's ownership interest in an associate or a joint venture is reduced, but the investment continues to be classified either as an associate or a joint venture respectively, the entity shall reclassify to profit or loss the proportion of the gain or loss that had previously been recognised in other comprehensive income relating to the reduction in ownership interest if that gain or loss would be required to be reclassified to profit or loss on the disposal of the related assets or liabilities.

e. Foreign currency transactions and translations

Transactions denominated in foreign currencies

Items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates (the "functional currency").

BNI and its Subsidiaries domiciled in Indonesia maintain their accounting records in Rupiah, except for BNI Remittance in which its accounting records are maintained in United States Dollar. Transactions during the year involving currencies other than Rupiah are recorded at the exchange rates prevailing at the time the transactions were made.

The consolidated financial statements are presented in Rupiah, which is the functional currency of BNI.

At the consolidated statement of financial position date, all monetary assets and liabilities denominated in foreign currencies are translated to Rupiah using the Reuters middle rate at 15:00 Western Indonesian Time (WIB). The resulting gains or losses from the translation of monetary assets and liabilities in foreign currencies are recognised in the consolidated statement of profit or loss for the current year.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

e. Transaksi dalam mata uang asing dan penjabaran (lanjutan)

Penjabaran aset dan liabilitas dalam mata uang asing (lanjutan)

Pada tanggal 31 Desember 2024 dan 2023, kurs mata uang asing yang digunakan untuk penjabaran mata uang asing terhadap Rupiah adalah sebagai berikut (dalam Rupiah penuh):

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***e. Foreign currency transactions and translations** (continued)*

Translation of assets and liabilities denominated in foreign currencies (continued)

As of 31 December 2024 and 2023, the foreign currency exchange rates used for translation of foreign currencies to Rupiah are as follows (amounts in full Rupiah):

	31 Desember/ *December* 2024	**31 Desember/ *December* 2023**	
1 Pound Sterling Inggris	20,219	19,627	*Great Britain Pound Sterling 1*
1 Euro Eropa	16,758	17,038	*European Euro 1*
1 Dolar Amerika Serikat	16,095	15,397	*United States Dollar 1*
1 Dolar Singapura	11,845	11,676	*Singapore Dollar 1*
1 Dolar Australia	10,014	10,521	*Australian Dollar 1*
1 Dolar Hong Kong	2,073	1,971	*Hong Kong Dollar 1*
1 Yen Jepang	103	109	*Japanese Yen 1*

Penjabaran laporan keuangan sehubungan dengan konsolidasian laporan cabang BNI yang berkedudukan di luar negeri

Cabang BNI yang berkedudukan di luar negeri menyelenggarakan pembukuannya dalam mata uang negara tempat kedudukannya.

Untuk tujuan konsolidasian, laporan keuangan cabang BNI tersebut dijabarkan ke dalam mata uang Rupiah dengan cara sebagai berikut:

- Saldo akun-akun aset dan liabilitas dijabarkan dengan menggunakan kurs *spot Reuters* jam 15:00 WIB pada tanggal laporan posisi keuangan konsolidasian;
- Saldo akun-akun laba rugi setiap harinya dijabarkan dengan menggunakan kurs *spot Reuters* jam 15:00 WIB. Saldo untuk tahun berjalan merupakan jumlah dari penjabaran harian tersebut;
- Akun ekuitas dijabarkan dengan menggunakan kurs historis; dan
- Selisih yang timbul sebagai akibat dari penjabaran ini disajikan di laporan posisi keuangan konsolidasian sebagai bagian dari ekuitas pada akun "Selisih Kurs karena Penjabaran Laporan Keuangan dalam Mata Uang Asing".

Translation of financial statements relating to consolidation of BNI branches domiciled outside of Indonesia

BNI's branches domiciled outside of Indonesia maintain their accounting records in their respective domestic currencies.

For consolidation purposes, the financial statements of such branches domiciled outside of Indonesia are translated into Rupiah as follows:

- *Assets and liabilities accounts are translated using the Reuters spot rates at 15:00 WIB at the consolidated statement of financial position date;*
- *Revenues and expenses accounts are translated using the daily Reuters spot rate at 15:00 WIB. The balances for the year represent the sum of those daily translations;*
- *Equity accounts are recorded using the historical rates; and*
- *Differences arising from translation are presented in the consolidated statement of financial position balance as part of equity under "Exchange Difference on Translation of Foreign Currency Financial Statements".*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Giro pada bank lain dan Bank Indonesia

Giro pada bank lain dan Bank Indonesia diklasifikasikan sebagai biaya perolehan yang diamortisasi. Giro pada bank lain dan Bank Indonesia dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

g. Penempatan pada bank lain dan Bank Indonesia

Penempatan pada bank lain dan Bank Indonesia terdiri dari *Deposit Facility* Bank Indonesia*, Term Deposit, call money* dan deposito berjangka.

Penempatan pada bank lain dan Bank Indonesia diklasifikasikan sebagai biaya perolehan yang diamortisasi. Penempatan pada bank lain dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

h. Efek-efek dan Obligasi Pemerintah

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia (SBI), Sertifikat Deposito Bank Indonesia, unit penyertaan reksa dana, obligasi, obligasi subordinasi, Sekuritas Rupiah Bank Indonesia (SRBI), saham yang dimiliki untuk diperdagangkan dan instrumen utang lainnya yang diperdagangkan di pasar uang dan pasar modal.

Obligasi Pemerintah terdiri dari Obligasi Rekapitalisasi Pemerintah yang diterbitkan kepada BNI dan bank lainnya berkaitan dengan program rekapitalisasi Pemerintah dan obligasi lainnya yang diterbitkan oleh Pemerintah Indonesia dan negara lainnya, yang tidak berkaitan dengan program rekapitalisasi, yang diperoleh melalui pasar perdana dan sekunder.

Pada saat pengakuan awal, efek-efek dan Obligasi Pemerintah dicatat sesuai dengan kategorinya yaitu aset keuangan diklasifikasikan pada biaya perolehan yang diamortisasi, nilai wajar melalui penghasilan komprehensif lain atau nilai wajar melalui laba rugi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

f. Current accounts with other banks and Bank Indonesia

The current accounts with other banks and Bank Indonesia are classified as amortised cost. Current accounts with other banks and Bank Indonesia are stated at amortised cost using the effective interest rate method less allowance for impairment losses.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

g. Placements with other banks and Bank Indonesia

Placements with other banks and Bank Indonesia consist of Bank Indonesia Deposit Facility, Term Deposit, call money and time deposits.

Placements with other banks and Bank Indonesia are classified as amortised cost. Placements with other banks are stated at amortised cost using the effective interest rate method less allowance for impairment losses.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

h. Marketable securities and Government Bonds

Marketable securities consist of Certificates of Bank Indonesia (SBI), Certificates Deposits of Bank Indonesia, mutual fund units, bonds, subordinated bonds, Sekuritas Rupiah Bank Indonesia (SRBI), shares held-for-trading and other debt instruments traded in the money market and stock exchanges.

Government Bonds consist of Government Recapitalization Bonds issued to BNI and other banks with respect to the recapitalization program of the Government and other bonds issued by the Government of Indonesia and other countries, that are not related to the recapitalisation program, acquired through the primary and secondary markets.

At initial recognition, the marketable securities and Government Bonds are recorded according to their category, i.e., amortised cost, fair value through other comprehensive income or at fair value through profit or loss.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

h. Efek-efek dan Obligasi Pemerintah (lanjutan)

Surat Berharga Syariah adalah surat bukti investasi berdasarkan prinsip syariah yang lazim diperdagangkan di pasar uang syariah dan/atau pasar modal syariah antara lain obligasi syariah (sukuk) dan surat berharga lainnya berdasarkan prinsip syariah.

Pada saat pengakuan awal, Grup mengakui investasi pada sukuk sebagai diukur pada biaya perolehan dan pada nilai wajar melalui penghasilan komprehensif lain sebesar nilai wajar ditambah atau dikurangi biaya transaksi terkait perolehan investasi tersebut. Sedangkan investasi pada sukuk ijarah dan sukuk mudharabah yang diukur pada nilai wajar melalui laba rugi diakui sebesar nilai wajar.

Grup menentukan klasifikasi investasi pada surat berharga, khususnya sukuk, berdasarkan model usaha yang ditentukan berdasarkan klasifikasi sesuai PSAK 410 (Revisi 2020) tentang “Akuntansi Sukuk" sebagai berikut:

- Surat berharga diukur pada biaya perolehan disajikan sebesar biaya perolehan (termasuk biaya investasi) yang disesuaikan dengan premi dan/atau diskonto yang belum diamortisasi. Premi dan diskonto diamortisasi selama periode hingga jatuh tempo.
- Surat berharga diukur pada nilai wajar melalui laba rugi, yang dinyatakan sebesar nilai wajar. Keuntungan atau kerugian yang belum direalisasi akibat kenaikan atau penurunan nilai wajarnya disajikan dalam laporan laba rugi periode yang bersangkutan.
- Surat berharga yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya disajikan sebesar nilai wajar. Keuntungan atau kerugian yang belum direalisasi akibat kenaikan atau penurunan nilai wajarnya disajikan dalam penghasilan komprehensif lain. Premi dan diskonto diamortisasi selama periode hingga jatuh tempo.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***h. Marketable securities and Government Bonds** (continued)*

Sharia Securities are proof of investment based on sharia principles that are commonly traded in the sharia money market and/or sharia capital markets, including sharia bonds (sukuk) and other securities following sharia principles.

At initial recognition, the Group recognise investments in sukuk are stated at cost and measured at fair value through other comprehensive income at fair value add or less transaction cost related to acquisition investment. Whereas investment in sukuk ijarah and sukuk mudharabah are measured at fair value through profit and loss and recognised at fair value.

The Group defines the classification of investment in marketable securities, specifically sukuk, based on business model in accordance with SFAS 410 (Revised 2020) on "Accounting for Sukuk" as follows:

- *At cost securities are stated at cost (including transaction costs), adjusted by unamortised premium and/or discount. Premium and discount are amortised over the period until maturity.*
- *Securities are stated at fair values through profit or loss, and stated at fair value. Unrealised gains or losses from the increase or decrease in fair values are presented in current period profit or loss.*
- *At fair value through other comprehensive income securities are measured at fair value. Unrealised gains or losses from the increase or decrease in fair value are presented in other comprehensive income. Premium and discount are amortised over the period until maturity.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

i. Efek-efek yang dibeli/dijual dengan janji dijual/dibeli kembali

Efek-efek yang dibeli dengan janji untuk dijual kembali diklasifikasikan sebagai biaya perolehan yang diamortisasi.

Efek-efek yang dibeli dengan janji untuk dijual kembali disajikan sebagai aset dalam laporan posisi keuangan konsolidasian sebesar jumlah penjualan kembali dikurangi dengan pendapatan bunga yang belum diamortisasi dan cadangan kerugian penurunan nilai. Selisih antara harga beli dan harga jual kembali diperlakukan sebagai pendapatan bunga yang ditangguhkan, dan diakui sebagai pendapatan selama periode sejak efek-efek tersebut dibeli hingga dijual menggunakan suku bunga efektif.

Efek-efek yang dijual dengan janji untuk dibeli kembali diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan konsolidasian sebesar jumlah pembelian kembali, dikurangi dengan bunga dibayar di muka yang belum diamortisasi. Selisih antara harga jual dan harga beli kembali diperlakukan sebagai bunga dibayar di muka dan diakui sebagai beban bunga selama jangka waktu sejak efek-efek tersebut dijual hingga dibeli kembali menggunakan metode suku bunga efektif.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

j. Wesel ekspor dan tagihan lainnya

Wesel ekspor dan tagihan lainnya terdiri atas tagihan dari *Letters of Credit* dan Surat Kredit Berdokumen Dalam Negeri (SKBDN) kepada eksportir.

Wesel ekspor dan tagihan lainnya diklasifikasikan sebagai biaya perolehan yang diamortisasi.

Wesel ekspor dan tagihan lainnya dicatat pada biaya perolehan diamortisasi setelah dikurangi cadangan kerugian penurunan nilai.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

i. Securities purchased/sold under agreements to resell/repurchase

Securities purchased under agreements to resell are classified as amortised cost.

Securities purchased under agreements to resell are presented as assets in the consolidated statement of financial position, at the resale price net of unamortised interest income and allowance for impairment losses. The difference between the purchase price and the resale price is treated as unearned interest income, and recognised as income over the period starting from when those securities are purchased until they are sold using effective interest rate method.

Securities sold under agreements to repurchase are classified as financial liabilities measured at amortised cost.

Securities sold under agreements to repurchase are presented as liabilities in the consolidated statement of financial position, at the repurchase price, net of unamortised prepaid interest. The difference between the selling price and the repurchase price is treated as prepaid interest and recognised as interest expense over the period starting from when those securities are sold until they are repurchased using effective interest rate method.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

j. Bills and other receivables

Bills and other receivables consists of receivables from Letters of Credit and Domestic Documentary Letters of Credit to exporters.

Bills and other receivables are classified as amortised cost.

Bills and other receivables are stated at amortised cost less allowance for impairment losses.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

k. Instrumen keuangan derivatif

Dalam melakukan usaha bisnisnya, BNI melakukan transaksi instrumen keuangan derivatif seperti kontrak berjangka mata uang asing, *swap* mata uang asing, *swap* atas suku bunga, dan transaksi *spot* untuk mengelola eksposur pada risiko pasar seperti risiko mata uang dan risiko tingkat suku bunga.

Instrumen keuangan derivatif diakui di laporan posisi keuangan konsolidasian pada nilai wajar. Setiap kenaikan nilai wajar kontrak derivatif dicatat sebagai aset apabila memiliki nilai wajar positif dan sebagai liabilitas apabila memiliki nilai wajar negatif.

Tagihan dan liabilitas derivatif diklasifikasikan sebagai aset dan liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi.

Keuntungan atau kerugian yang terjadi dari perubahan nilai wajar diakui dalam laporan laba rugi konsolidasian.

Nilai wajar instrumen derivatif ditentukan berdasarkan diskonto arus kas dan model penentu harga atau harga yang diberikan oleh *broker* (*quoted price*) atas instrumen lainnya yang memiliki karakteristik serupa.

Kontrak berjangka mata uang asing, *swap* mata uang asing dan *cross currency swap* dan tingkat suku bunga *swap* dilakukan untuk tujuan pendanaan dan perdagangan.

l. Pinjaman yang diberikan

Pinjaman yang diberikan

Pinjaman yang diberikan adalah penyediaan uang atau tagihan yang dapat disetarakan dengan itu, berdasarkan persetujuan atau kesepakatan pinjam-meminjam dengan debitur yang mewajibkan debitur untuk melunasi utang dan bunganya setelah jangka waktu tertentu, dan tagihan yang berasal dari fasilitas *trade finance* yang telah jatuh tempo yang belum diselesaikan dalam waktu 15 hari.

Pinjaman yang diberikan diklasifikasikan sebagai biaya perolehan yang diamortisasi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

k. Derivative financial instruments

In the normal course of its business, BNI enters into transactions involving derivative financial instruments such as foreign currency forward contracts, foreign currency swaps, interest rate swaps, and spot transactions to manage exposures on market risks, such as currency risk and interest rate risks.

Derivative financial instruments are recognised in the consolidated statement of financial position at fair value. Each increase in fair value derivative contract is carried as asset when the fair value is positive and as liability when the fair value is negative.

Derivative receivable and payable are classified as financial assets and liabilities at fair value through profit or loss.

Gains or losses resulting from fair value changes are recognised in the consolidated statement of profit or loss.

The fair value of derivative instruments is determined based on discounted cash flows and pricing models or quoted prices from brokers of other instruments with similar characteristics.

Foreign currency forward contracts, foreign currency swaps, and cross currency and interest rate swaps are for funding and trading purposes.

l. Loans

Loans

Loans represent funds provided or receivables that can be considered as equivalents thereof, based on agreements or financing contracts with borrowers, where borrowers are required to repay their debts with interest after a specified period, and matured trade finance facilities which have not been settled within 15 days.

Loans are classified as amortised cost.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

l. Pinjaman yang diberikan (lanjutan)

Pinjaman yang diberikan pada awalnya diukur pada nilai wajar ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung untuk memperoleh aset keuangan tersebut, dan setelah pengakuan awal diukur pada biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi dengan cadangan kerugian penurunan nilai.

Pinjaman sindikasi dan pinjaman penerusan dicatat sesuai dengan porsi pinjaman yang risikonya ditanggung oleh Grup.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

m. Kontrak jaminan keuangan

Kontrak jaminan keuangan adalah kontrak yang mengharuskan penerbit untuk melakukan pembayaran yang ditetapkan untuk mengganti uang pemegang kontrak atas kerugian yang terjadi karena debitur tertentu gagal untuk melakukan pembayaran pada saat jatuh tempo, sesuai dengan ketentuan dari instrumen hutang. Jaminan keuangan tersebut diberikan kepada bank-bank, lembaga keuangan dan badan-badan lainnya atas nama debitur untuk menjamin kredit dan fasilitas-fasilitas perbankan lainnya.

Jaminan keuangan diakui awalnya sebesar nilai wajar pada tanggal jaminan diberikan. Nilai wajar dari jaminan keuangan pada saat dimulainya transaksi pada umumnya sama dengan provisi yang diterima untuk jaminan diberikan dengan syarat dan kondisi normal. Pendapatan provisi yang diperoleh diamortisasi selama jangka waktu jaminan menggunakan metode garis lurus.

Setelah pengakuan awal kontrak, jaminan keuangan dicatat pada nilai yang lebih tinggi antara nilai wajar amortisasi dengan nilai kerugian kredit ekspektasian sesuai PSAK 109 “Instrumen Keuangan”.

Cadangan kerugian penurunan nilai atas kontrak jaminan keuangan yang memiliki risiko kredit dihitung berdasarkan model kerugian ekspektasian.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

l. Loans *(continued)*

Loans are initially measured at fair value plus transaction costs that are directly attributable to obtain financial assets, and after initial recognition are measured at amortised cost based on the effective interest rate method less allowance for impairment losses.

Syndicated loans and two step loans are recorded according to the proportion of risks borne by the Group.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

m. Financial guarantee contracts

Financial guarantee contracts are contracts that require the issuer to make specified payments to reimburse the holder for a loss incurred because a specified debtor defaulted to make payments when due, in accordance with the terms of a debt instrument. Such financial guarantees are given to banks, financial institutions and other institutions on behalf of customers to secure loans and other banking facilities.

Financial guarantees are initially recognised at fair value on the date the guarantee was given. The fair value of a financial guarantee at inception is likely to be equal to the premium received because all guarantees are agreed on arm’s length terms. The fee income earned is amortised over the period of guarantees using the straight line method.

After initial recognition of the contract, the financial guarantee is recorded at the higher of the amortised fair value and the expected credit loss value in accordance with SFAS 109 “Financial Instrument”.

Allowances for impairment on financial guarantee contracts with credit risk are calculated based on expected credit losses model.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

n. Tagihan dan liabilitas akseptasi

Tagihan akseptasi diklasifikasikan sebagai aset keuangan dalam kelompok biaya perolehan diamortisasi. Liabilitas akseptasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

o. Penyertaan saham

Penyertaan saham merupakan penanaman dana dalam bentuk saham pada perusahaan yang bergerak di bidang jasa keuangan untuk tujuan jangka panjang.

Investasi dengan persentase kepemilikan di bawah 20% dan tidak memiliki pengaruh signifikan yang diklasifikasikan sebagai aset keuangan yang dimiliki untuk dijual dicatat pada nilai wajar melalui laba rugi.

Investasi dengan persentase kepemilikan di bawah 20% dan tidak memiliki pengaruh signifikan yang diklasifikasikan sebagai aset keuangan yang dimiliki tidak untuk dijual dicatat pada nilai wajar melalui penghasilan komprehensif lain.

Penyertaan sementara pada perusahaan debitur timbul akibat konversi pinjaman yang diberikan menjadi saham. Pada saat pengakuan awal, saham yang diterima diakui dengan nilai wajar. Selanjutnya, saham tersebut dinilai dengan menggunakan metode ekuitas apabila BNI memiliki pengaruh signifikan terhadap *investees* dan diklasifikasikan sebagai aset keuangan apabila BNI tidak memiliki pengaruh signifikan terhadap *investees*.

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud

Aset tetap

Grup menerapkan kebijakan akuntansi model revaluasi untuk aset tetap berupa tanah dan bangunan. Untuk aset tetap selain tanah dan bangunan menggunakan model biaya.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

n. Acceptance receivables and payables

Acceptance receivables are classified as financial assets measured at amortised cost. Acceptance liabilities are classified financial liabilities measured at amortised cost.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

o. Equity investments

Equity investments represent investments in the form of shares of stock, in companies engaged in financial services held for long-term purposes.

Investments with an ownership interest below 20% and have no significant influence classified as financial asset which held for sale is measured at fair value through profit or loss.

Investments with an ownership interest below 20% and have no significant influence classified as financial asset which are not held for sale are measured at fair value through other comprehensive income.

Temporary investments in debtor companies arise from conversion of loans to shares/equity. At initial recognition, shares received were recognised at fair value. Subsequently, the shares were recognised using equity method if BNI has significant influence over the investees or classified as financial asset if BNI does not have significant influence over the investees.

p. Fixed assets, right-of-use assets, lease liabilities and intangible assets

Fixed assets

Group applies revaluation model as accounting policy for land and buildings. For fixed assets other than land and buildings, it applies cost model.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset tetap (lanjutan)

Tanah dan bangunan disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan untuk bangunan. Penilaian terhadap tanah dan bangunan dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi. Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Nilai tercatat bruto disesuaikan dengan cara yang konsisten dengan nilai tercatat revaluasi aset. Sebagai contoh, nilai tercatat bruto dapat direvaluasi dengan mengacu pada data pasar yang dapat diobservasi atau dapat direvaluasi secara proporsional dengan perubahan nilai tercatat. Akumulasi penyusutan pada tanggal revaluasi disesuaikan dengan selisih antara nilai tercatat bruto dan nilai tercatat aset setelah memperhitungkan akumulasi kerugian penurunan nilai.

Jika nilai wajar dari aset yang direvaluasi mengalami perubahan yang signifikan, maka perlu direvaluasi secara tahunan, sedangkan jika nilai wajar dari aset yang direvaluasi tidak mengalami perubahan yang signifikan, maka perlu dilakukan revaluasi paling kurang 3 tahun sekali.

Kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Cadangan Revaluasi Aset" dan disajikan sebagai "Penghasilan Komprehensif Lain". Penurunan nilai tercatat yang timbul dari revaluasi dicatat sebagai beban pada tahun berjalan. Apabila aset tersebut memiliki saldo "Keuntungan Revaluasi Aset Tetap" yang disajikan sebagai "Penghasilan Komprehensif Lain", maka selisih penurunan nilai tercatat tersebut dibebankan terhadap "Keuntungan Revaluasi Aset Tetap" dan sisanya diakui sebagai beban tahun berjalan.

Aset tetap selain tanah dan bangunan disajikan sebesar harga perolehan dikurangi dengan akumulasi penyusutan.

Biaya perolehan termasuk biaya penggantian bagian aset tetap saat biaya tersebut terjadi, jika memenuhi kriteria pengakuan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

***Fixed assets** (continued)*

Land and buildings are shown at fair value, less accumulated depreciation for buildings. Valuation of land and buildings are performed by external independent valuers with certain qualification. Valuations are performed with sufficient regularity to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. The gross carrying amount is adjusted in a manner that is consistent with the revaluation of the carrying amount of the asset. For example, the gross carrying amount may be revalued by reference to observable market data or it may be revalued proportionately to the change in the carrying amount. The accumulated depreciation at the date of the revaluation is adjusted to equal the difference between the gross carrying amount and the carrying amount of the assets after taking into account accumulated impairment losses.

If the fair value of the revalued asset change significantly, it is necessary to revaluate on an annual basis, whereas if the fair value of the revaluated asset does not change significantly, it is necessary to revaluate at a minimum every 3 years.

Increases in the carrying amount arising on revaluation of land and building is recorded in "Asset Revaluation Reserve" and presented as "Other Comprehensive Income". Decreases in carrying amount as the result of revaluation is recorded as expense in the current year. If the asset has a balance on its "Gain on Revaluation of Fixed Assets", loss from revaluation of fixed asset is charged to "Gain on Revaluation of Fixed Assets" which is presented as "Other Comprehensive Income" and the rest of the amount is charged to current year's expenses.

Fixed assets besides land and buildings are stated at historical cost less accumulated depreciation.

Cost includes the replacement cost of a part of the fixed assets when the expenditure meets the criteria for recognition.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset tetap (lanjutan)

Semua biaya pemeliharaan dan perbaikan yang tidak memenuhi kriteria untuk dikapitalisasi diakui dalam laporan laba rugi pada saat terjadinya. Pada setiap akhir tahun buku, nilai residu, umur manfaat, dan metode penyusutan ditelaah kembali dan jika sesuai dengan keadaan, disesuaikan secara prospektif.

Semua aset tetap kecuali tanah, disusutkan berdasarkan metode garis lurus selama estimasi masa manfaat aset tersebut sebagai berikut:

	Tarif Penyusutan/ *Depreciation Rate*	**Tahun/*Years***	
Bangunan	6.67%	15	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	20.00%	5	*Office equipment and motor vehicles*

Perlengkapan kantor terdiri dari perabotan dan perlengkapan, instalasi, Anjungan Tunai Mandiri (ATM), perangkat lunak dan perangkat keras komputer, peralatan komunikasi dan peralatan kantor lainnya.

Grup menganalisa fakta dan keadaan untuk masing-masing jenis hak atas tanah dalam menentukan akuntansi untuk masing-masing hak atas tanah tersebut sehingga dapat merepresentasikan dengan tepat suatu kejadian atau transaksi ekonomi yang mendasarinya. Jika hak atas tanah tersebut tidak mengalihkan pengendalian atas aset pendasar kepada Grup, melainkan mengalihkan hak untuk menggunakan aset pendasar, Grup menerapkan perlakuan akuntansi atas transaksi tersebut sebagai sewa berdasarkan PSAK 116 "Sewa", kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Grup menerapkan PSAK 216 "Aset Tetap".

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, yang ditentukan sebagai nilai tertinggi antara harga jual neto dan nilai yang dipakai.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai perolehan dan akumulasi penyusutannya dihapuskan dari akun tersebut. Keuntungan atau kerugian yang terjadi diakui dalam laporan laba rugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

***Fixed assets** (continued)*

All maintenance and repair costs which do not fulfill the capitalization criteria, are recognised in profit or loss upon occurrence. At each financial year end, the assets' residual values, useful life, and methods of depreciation are reviewed, and adjusted prospectively as appropriate.

All fixed assets, except land, are depreciated using the straight-line method over their expected useful lives as follows:

Office equipment consists of furniture and fixtures, installation, Automatic Teller Machines (ATM), computer software and hardware, communication and other office equipment.

The Group analyses the facts and circumstances for each type of land rights in determining the accounting for each of these land rights so that it can accurately represent an underlying economic event or transaction. If the landrights do not transfer control of the underlying assets to the Group, but gives the rights to use the underlying assets, the Group applies the accounting treatment of these transactions as leases under SFAS 116 "Leases", except if landrights substantially similar to land purchases, the Group applies SFAS 216 "Property, Plant and Equipment".

When the carrying amount of an asset is greater than its estimated recoverable amount, it is written down to its recoverable amount, which is determined as the higher of the net selling price or value in use.

When fixed assets are retired or disposed of, their costs and the related accumulated depreciation are derecognised from the accounts. Any resulting gain or loss is recognised in profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset tetap (lanjutan)

Akumulasi biaya konstruksi aset tetap dikapitalisasi dan dicatat sebagai "Aset dalam Penyelesaian". Biaya tersebut direklasifikasi ke akun aset tetap yang terkait pada saat proses konstruksi atau pemasangan telah selesai.

Aset hak-guna dan liabilitas sewa

Pada tanggal permulaan kontrak, Grup menilai apakah kontrak merupakan atau mengandung sewa. Suatu kontrak merupakan atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan. Grup dapat memilih untuk tidak mengakui aset hak-guna dan liabilitas sewa untuk:

- Sewa dengan jangka waktu kurang atau sama dengan 12 bulan dan tidak terdapat opsi beli;
- Sewa atas aset dengan nilai rendah.

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Grup harus menilai apakah:

- Grup memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan
- Grup memiliki hak untuk mengarahkan penggunaan aset identifikasian. Grup memiliki hak ini ketika Grup memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya:
  1. Grup memiliki hak untuk mengoperasikan aset; dan
  2. Grup telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

p. Fixed assets, right-of-use assets, lease liabilities and intangible assets *(continued)*

Fixed assets *(continued)*

The accumulated costs of construction of fixed assets are capitalised and recognised as "Construction in progress". These costs are reclassified to the related fixed asset account when the construction or installation is completed.

Right-of-use assets and lease liabilities

At the inception of a contract, the Group assesses whether the contract is or contains a lease. A contract is or contains a lease if the contract conveys the right to control the use of an identified assets for a period of time in exchange for consideration. The Group can choose not to recognise the right-of-use assets and lease liabilities for:

- *Leases with a term of less or equal to 12 months and there is no call option;*
- *Leases of low value assets.*

To assess whether a contract conveys the right to control the use of an identified asset, the Group shall assess whether:

- *The Group has the right to obtain substantially all the economic benefit from use of the asset throughout the period of use; and*
- *The Group has the right to direct the use of the asset. The Group has described when it has a decision-making right that are the most relevant to changing how and for what purpose the asset is used are predetermined:*
  1. *The Group has the right to operate the asset; and*
  2. *The Group has designed the asset in a way that predetermine how and for what purposes it will be used.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset hak-guna dan liabilitas sewa (lanjutan)

Pada tanggal permulaan sewa, Grup mengakui aset hak-guna dan liabilitas sewa. Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan. Aset hak-guna diamortisasi dengan menggunakan metode garis lurus sepanjang jangka waktu sewa.

Liabilitas sewa diukur pada nilai kini pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan dengan menggunakan suku bunga implisit dalam sewa atau jika suku bunga tersebut tidak dapat ditentukan, maka menggunakan suku bunga pinjaman inkremental. Pada umumnya, Grup menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

Jika sewa mengalihkan kepemilikan aset pendasar kepada Grup pada akhir masa sewa atau jika biaya perolehan aset hak-guna merefleksikan Grup akan mengeksekusi opsi beli, maka Grup menyusutkan aset hak-guna dari tanggal permulaan hingga akhir umur manfaat aset pendasar. Jika tidak, maka Grup menyusutkan aset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

p. Fixed assets, right-of-use assets, lease liabilities and intangible assets *(continued)*

Right-of-use assets and lease liabilities *(continued)*

The Group recognises a right-of-use assets and a leases liability at the leases commencement date. The right-of-use assets is initially measured at cost, which comprises the initial amount of the leases liability adjusted for any leases payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use assets is amortised over the straight-line method throughout the lease term.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, using incremental borrowing rate. Generally, the Group uses its incremental borrowing rate as a discount rate.

Each leases payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the leases period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

If the leases transfers ownership of the underlying asset to the Group by the end of the leases term or if the cost of the right-of-use assets reflects that the Group will exercise a purchase option, the Group depreciates the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Group depreciates the right-of-use assets from the commencement date to the earlier of the end of the useful life of the right-of-use assets or the end of the leases term.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Modifikasi sewa

Grup mencatat modifikasi sewa sebagai sewa terpisah jika:
- Modifikasi meningkatkan ruang lingkup sewa dengan menambahkan hak untuk menggunakan satu aset pendasar atau lebih;
- Imbalan sewa meningkat sebesar jumlah yang setara dengan harga tersendiri untuk peningkatan dalam ruang lingkup dan penyesuaian yang tepat pada harga tersendiri tersebut untuk merefleksikan kondisi kontrak tertentu.

Aset takberwujud

Aset takberwujud diakui jika, dan hanya jika, biaya perolehan aset tersebut dapat diukur secara andal dan kemungkinan besar Bank dan Entitas Anak akan memperoleh manfaat ekonomis masa depan dari aset tersebut. Aset takberwujud terdiri dari *goodwill*, hubungan pelanggan dan merek dagang yang diperoleh pada saat akuisisi.

Lihat Catatan 2d untuk kebijakan akuntansi terkait *goodwill*.

q. Agunan yang diambil alih

Agunan yang diambil alih disajikan dalam akun "Aset Lain-lain".

Agunan yang diambil alih (AYDA) adalah aset yang diperoleh BNI dan Entitas Anak, baik melalui pelelangan maupun diluar pelelangan berdasarkan penyerahan secara sukarela oleh pemilik agunan atau berdasarkan kuasa untuk menjual diluar lelang dari pemilik agunan dalam hal debitur tidak memenuhi liabilitasnya kepada BNI dan Entitas Anak. AYDA merupakan jaminan kredit yang diberikan yang telah diambil alih sebagai bagian dari penyelesaian kredit yang diberikan dan disajikan pada "Aset Lain-lain".

Agunan yang diambil alih diakui sebesar nilai neto yang dapat direalisasi atau sebesar nilai *outstanding* kredit yang diberikan, mana yang lebih rendah. Nilai neto yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai neto yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset. Selisih antara nilai agunan yang diambil alih dengan hasil penjualan diakui sebagai keuntungan atau kerugian pada saat penjualan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

Lease modification

The Group account for a lease modification as a separate lease if both:
- *The modification increases the scope of the lease by adding the right to use one or more underlying assets;*
- *The consideration for the lease increases by an amount commensurate with the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.*

Intangible Assets

Intangible assets are recognised if, and only if the cost of the asset can be measured reliably and it is probable that the Bank and Subsidiaries will obtain future economic benefits from the asset. Intangible assets consist of goodwill, customer relationships and trademarks acquired by the Bank and Subsidiaries when acquisition.

Refer to Note 2d for the accounting policies of goodwill.

q. Foreclosed collaterals

Foreclosed collaterals are included in the "Other Assets" account.

Foreclosed collaterals represent assets acquired by BNI and Subsidiaries, both from auction and non auction based on voluntary transfer by the debtor or based on debtor's approval to sell the collateral where the debtor could not fulfill their obligations to BNI and Subsidiaries. Foreclosed collaterals represent loan collateral that were taken over as part of loans settlement and presented in "Other Assets".

Foreclosed collaterals are stated at net realizable value or stated at loan outstanding amount, whichever is lower. Net realizable value is the fair value of the foreclosed collaterals less the estimated costs to sell the assets. The excess of loan receivable over the net realizable value of the foreclosed collateral is charged to allowance for impairment losses. The difference between the recorded amount of the foreclosed collateral and the proceeds from the sale of such collateral is recorded as a gain or loss at the time of sale.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

q. Agunan yang diambil alih (lanjutan)

Beban-beban yang berkaitan dengan pemeliharaan agunan yang diambil alih dibebankan dalam laporan laba rugi pada saat terjadinya.

Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi.

r. Liabilitas segera

Liabilitas segera dicatat pada saat liabilitas kepada masyarakat maupun kepada bank lain timbul.

Akun ini diklasifikasikan sebagai liabilitas keuangan lain dan dihitung berdasarkan biaya perolehan diamortisasi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

s. Simpanan nasabah

Tabungan merupakan simpanan nasabah di BNI dan Entitas Anak yang bergerak di bidang perbankan yang penarikannya hanya dapat dilakukan melalui *counter* dan Anjungan Tunai Mandiri (ATM) atau dengan cara pemindahbukuan melalui *SMS Banking, Phone Banking, Mobile Banking* dan *Internet Banking* jika memenuhi persyaratan yang disepakati, tetapi penarikan tidak dapat dilaksanakan dengan menggunakan cek atau instrumen setara lainnya.

Deposito berjangka merupakan simpanan nasabah di BNI dan Entitas Anak yang bergerak di bidang perbankan yang penarikannya hanya dapat dilakukan pada waktu tertentu sesuai dengan perjanjian antara nasabah dengan BNI dan Entitas Anak yang bergerak di bidang perbankan.

Simpanan nasabah diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi menggunakan metode suku bunga efektif. Biaya tambahan yang dapat diatribusikan secara langsung dengan perolehan simpanan nasabah dikurangkan dari jumlah simpanan yang diterima.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***q. Foreclosed collaterals** (continued)*

Maintenance and repair costs related to foreclosed collaterals are charged as an expense in profit or loss when incurred.

If there is permanent decline in value, the carrying amount of foreclosed collaterals is written down to recognise such permanent decline in value and any losses from such write-down is recognised in profit or loss.

r. Obligations due immediately

Obligations due immediately are recorded at the time obligations to public customers or other banks arise.

This account is classified as other financial liabilities and is measured at amortised cost.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

s. Deposits from customers

Savings account represent deposits of customers in BNI and a Subsidiary engaged in banking that may only be withdrawn over the counter and via ATMs or funds transfers by SMS Banking, Phone Banking, Mobile Banking and Internet Banking when certain agreed conditions are met, but which may not be withdrawn by cheque or other equivalent instruments.

Time deposits represent customer's deposits in BNI and a Subsidiary engaged in banking that may be withdrawn at a certain time based on the agreement between the depositor and BNI and a Subsidiary engaged in banking.

Deposits from customers are classified as other financial liabilities which are measured at amortised cost using effective interest rate method. Incremental costs directly attributable to the acquisition of deposits from customers are deducted from the amount of deposits.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

t. Simpanan dari bank lain

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain baik lokal maupun luar negeri, dalam bentuk giro, *inter-bank call money* dengan periode jatuh tempo menurut perjanjian kurang dari atau 90 hari, deposito berjangka dan sertifikat deposito.

Simpanan dari bank lain diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Biaya tambahan yang dapat diatribusikan secara langsung dengan perolehan simpanan dari bank lain dikurangkan dari jumlah simpanan yang diterima.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

u. Efek-efek yang diterbitkan

Efek-efek yang diterbitkan terdiri dari obligasi yang diterbitkan oleh Grup.

Efek-efek yang diterbitkan diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi. Biaya tambahan yang dapat diatribusikan secara langsung dengan penerbitan efek dikurangkan dari jumlah efek-efek yang diterbitkan.

Obligasi yang diterbitkan dicatat sebesar nilai nominal dikurangi saldo diskonto yang belum diamortisasi. Biaya-biaya yang terjadi sehubungan dengan penerbitan obligasi dicatat sebagai pengurang hasil emisi dan diamortisasi selama jangka waktu obligasi dengan menggunakan metode suku bunga efektif.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

v. Pinjaman yang diterima

Pinjaman diterima merupakan dana yang diterima dari bank lain, Bank Indonesia atau pihak lain dengan liabilitas pembayaran kembali sesuai dengan persyaratan perjanjian pinjaman.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

t. Deposits from other banks

Deposits from other banks represent liabilities to local and overseas banks, in the form of current accounts, inter-bank call money with original maturities of 90 days or less, time deposits and certificates of deposits.

Deposits from other banks are classified as other financial liabilities which are measured at amortised cost using effective interest rate method. Incremental costs directly attributable to the acquisition of deposits from other banks are deducted from the amount of deposits.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

u. Securities issued

Securities issued consist of bonds issued by the Group.

Securities issued are classified as other financial liabilities which are measured at amortised cost. Incremental costs directly attributable to the issuance of marketable securities are deducted from the amount of securities issued.

Bonds issued are presented at nominal value net of unamortised discount. Costs incurred related to the bond issuance are presented as deduction from the proceeds of bonds issued and amortised over the term of the bonds using the effective interest rate method.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

v. Borrowings

Borrowings are funds received from other bank, Bank Indonesia or other parties with payment obligation based on borrowings agreement.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

v. Pinjaman yang diterima (lanjutan)

Pinjaman diterima diakui sebesar nilai wajar pada awalnya dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal pinjaman diterima dan biaya transaksi merupakan bagian tidak terpisahkan dari metode suku bunga efektif.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

w. Pendapatan bunga dan beban bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan yang dikenakan suku bunga diakui pada laporan laba rugi dengan menggunakan metode suku bunga efektif.

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau, jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat bersih dari instrumen keuangan atau liabilitas keuangan. Pada saat menghitung suku bunga efektif, Grup mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, tetapi tidak mempertimbangkan kerugian kredit di masa mendatang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain diterima oleh para pihak dalam kontrak yang merupakan bagian tidak terpisahkan dari suku bunga efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

Kredit yang pembayaran angsuran pokok atau bunganya telah lewat 90 hari atau lebih setelah jatuh tempo, atau kredit yang pembayarannya secara tepat waktu diragukan, secara umum diklasifikasikan sebagai kredit yang mengalami penurunan nilai (*impairment*).

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***v. Borrowings** (continued)*

Borrowings are initially recognised at fair value and subsequently measured at amortised cost using the effective interest rate method. Amortised cost is calculated by taking into account any discount or premium related to the initial recognition of borrowings and transaction costs are an integral part of the effective interest rate method.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

w. Interest income and interest expense

Interest income and expense for all interest-bearing financial instruments are recognised in profit or loss using the effective interest rate method.

The effective interest rate is the rate that exactly discounts the estimated future cash payments or receipts through the expected life of the financial assets and financial liabilities (or, where appropriate, a shorter period) to the carrying amount of the financial asset or financial liability. When calculating the effective interest rate, the Group estimates future cash flows considering all contractual terms of the financial instrument but not future credit losses. This calculation includes all commissions, fees, and other forms received by the parties in the contract are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Loans for which the principal or interest has been past due for 90 days or more, or where reasonable doubt exists as to its timely collection, are generally classified as impaired loans.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Pendapatan provisi dan komisi

Pendapatan provisi dan komisi yang berkaitan langsung dengan kegiatan pinjaman, atau pendapatan provisi dan komisi yang berhubungan dengan jangka waktu tertentu, diamortisasi sesuai dengan jangka waktu kontrak menggunakan metode suku bunga efektif dan diklasifikasikan sebagai bagian dari pendapatan bunga pada laporan laba rugi.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian kredit atau suatu jangka waktu diakui sebagai pendapatan pada saat terjadinya transaksi sebagai pendapatan operasional lainnya.

y. Kontrak asuransi

Kontrak asuransi adalah kontrak yang diterbitkan oleh perusahaan asuransi dimana pada saat penerbitan polis perusahaan asuransi menerima risiko asuransi yang signifikan dari pemegang polis.

Risiko asuransi yang signifikan adalah kemungkinan untuk membayar manfaat secara signifikan kepada pemegang polis apabila suatu kejadian yang diasuransikan terjadi dibandingkan dengan manfaat minimum yang akan dibayarkan apabila risiko yang diasuransikan tidak terjadi. Skenario-skenario yang diperhatikan adalah skenario yang mengandung unsur komersial.

Grup mendefinisikan risiko asuransi yang signifikan sebagai kemungkinan membayar manfaat pada saat terjadinya suatu kejadian yang diasuransikan, yang setidaknya 10% lebih besar dari manfaat yang dibayarkan jika kejadian yang diasuransikan tidak terjadi. Jika suatu kontrak asuransi tidak mengandung risiko asuransi yang signifikan, maka kontrak tersebut diklasifikasikan sebagai kontrak investasi. Ketika sebuah kontrak telah diklasifikasi sebagai kontrak asuransi, reklasifikasi terhadap kontrak tersebut tidak dapat dilakukan kecuali ketentuan perjanjian kemudian diamendemen.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

x. Fees and commission income

Fees and commissions directly related to lending activities, or fee and commission income which relates to a specific period, is amortised over the term of contract using the effective interest rate method and classified as part of interest income in profit or loss.

Fees and commissions income which are not related to lending activities or a specific period are recognised as revenues on the transaction date as other operating income.

y. Insurance contract

Insurance contract is contract issued by insurance company which accepts significant insurance risk from policyholder upon the issuance of the policy.

Significant insurance risk is the possibility of paying significantly more benefit to the policyholder upon the occurrence of insured event compared to the minimum benefit payable in a scenario where the insured event does not occur. Scenarios considered are those with commercial substance.

Group defines significant insurance risk as the possibility of having to pay benefits on the occurrence of an insured event of at least 10% more than the benefits payable if the insured event did not occur. If the insurance contract does not contain significant insurance risk, the contract will be deemed as an investment contract. Once a contract has been classified as an insurance contract, no reclassification can be performed unless the terms of the agreement are later amended.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

Grup menerbitkan kontrak asuransi untuk produk asuransi tradisional dan produk asuransi yang dikaitkan dengan investasi. Kedua jenis produk ini mempunyai risiko asuransi yang signifikan.

Produk-produk dari Grup dibagi berdasarkan kategori utama sebagai berikut:

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contract** (continued)*

Group issues insurance contracts for traditional insurance product and investment linked insurance product. Both of these products have significant insurance risk.

Group's products may be divided into the following main categories:

Tipe polis/ ***Policy type***	**Deskripsi manfaat/** ***Description of benefits***
1) Asuransi jiwa tradisional *non-participating*/*Traditional non-participating life insurance*	Produk *non-participating* memberikan perlindungan untuk menutupi risiko kematian, kecelakaan, penyakit kritis, dan kesehatan dari pemegang polis. Jumlah uang pertanggungan akan dibayarkan pada saat terjadinya risiko yang ditanggung./*Non participating products provide protection to cover the risk of death, accident, critical illness, and health of the insured. The basic sum assured will be paid upon the occurrence of the risks covered.*
2) Produk asuransi *unit link*/ *Unit-linked insurance products*	*Unit link* adalah produk asuransi dengan pembayaran premi tunggal maupun regular yang dikaitkan dengan investasi yang memberikan kombinasi manfaat proteksi dan manfaat investasi./*Unit-linked is the insurance product with single and regular premium payment which linked to investment products, which provide a combined benefit of the protection and investment.* Manfaat dari perlindungan asuransi adalah untuk menanggung risiko kematian yang memberikan manfaat sebesar nilai uang pertanggungan dan ditambah manfaat investasi berupa akumulasi nilai dana investasi yang akan dibayarkan pada saat terjadinya risiko yang ditanggung./*The benefit of protection is to cover the risks of death which provide basic sum assured plus the cumulative balance of the fund value, these benefit will be paid upon the occurrence of the risks covered.* Nilai dana investasi akan dihitung berdasarkan tingkat pengembalian investasi yang didapat dari *fund* tergantung dari tipe *fund* yang dipilih oleh pemegang polis berdasarkan profil risiko investasi./*The investment fund value will be measured based on the yield of return from the underlying fund depend on the fund type which is chosen by the policyholders, depending on investment risk profile.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

Grup memisahkan komponen deposit dari kontrak *unit link* seperti yang disyaratkan oleh PSAK 104 hanya jika kondisi-kondisi di bawah ini terpenuhi:

- Grup dapat mengukur komponen *"deposit"* secara terpisah (termasuk opsi penyerahan melekat, yaitu tanpa memperhitungkan komponen "asuransi"); dan
- Kebijakan akuntansi Grup tidak mensyaratkan untuk mengakui semua hak dan kewajiban yang timbul dari komponen *"deposit"*.

Karena hanya kondisi pertama di atas terpenuhi, maka Grup tidak memisahkan komponen deposit dari kontrak *unit link.*

Pengujian kecukupan liabilitas

PSAK 104 ''Kontrak Asuransi'' mengharuskan setiap akhir periode pelaporan, Grup menilai apakah liabilitas manfaat polis masa depan, premi yang belum merupakan pendapatan dan estimasi klaim yang diakui dalam laporan posisi keuangan konsolidasian telah mencukupi, dengan membandingkan total tercatat tersebut dengan estimasi arus kas masa depan sesuai dengan kontrak asuransi.

Jika perbandingan tersebut menunjukkan bahwa nilai tercatat atas liabilitas kontrak asuransi (dikurangi dengan biaya akuisisi tangguhan dan aset takberwujud terkait) lebih rendah dibandingkan dengan estimasi nilai kini atas arus kas masa depan, maka kekurangan tersebut diakui dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian.

Tes kecukupan liabilitas dihitung berdasarkan diskonto dari arus kas untuk semua arus kas yang terkait yaitu arus kas keluar dan arus kas masuk seperti yang disebutkan di atas dengan menggunakan asumsi-asumsi aktuaria berdasarkan estimasi terbaik terkini yang ditetapkan oleh aktuaris Perusahaan, termasuk asumsi tingkat bunga, mortalitas/morbiditas, *lapse*, asumsi biaya dan inflasi tanpa margin atas risiko pemburukan (dan tanpa *flooring* atas cadangan untuk bisnis Konvensional).

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contract** (continued)*

Group unbundles the deposit component of unit-linked contract as required by SFAS 104 only when both of the following conditions are met:

- *Group can measure separately the "deposit" component (including any embedded surrender option, i.e. without taking into account the "insurance" component); and*
- *Group's accounting policies do not otherwise require to recognise all obligations and rights arising from the "deposit" component.*

Since only the first condition above is met, Group does not unbundle the deposit component of unit-linked contract.

Liability adequacy tests

SFAS 104 ''Insurance Contracts'' requires that at each end of reporting period, Group evaluates whether the liabilities for future policy benefits, unearned premium and estimated claims as recognised in the consolidated statement of financial position have been adequately recognised by comparing the carrying amount with the estimated future cash flows in accordance with the insurance contracts.

If the valuation indicates that the carrying value of insurance contract liabilities (net of deferred acquisition costs and relevant intangible assets) is lower compared to the estimated present value of future cash flows, then such deficiency is recognised in the consolidated statement of profit or loss and other comprehensive income.

The liability adequacy test is calculated based on discounted cash flows basis for all related cash flows i.e. both of cash outflows and cash inflows as mentioned above using a set of most recent best estimate actuarial assumptions which is set by the Company's appointed actuary, including interest rate assumptions, mortality/morbidity assumptions, lapse assumptions, expense assumptions and inflation assumptions without margin for adverse deviation assumption (and without reserve flooring for Conventional business).

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

Pengujian kecukupan liabilitas (lanjutan)

Grup menerapkan metode *Gross Premium Valuation* dalam perhitungan liabilitas kepada pemegang polis dengan menggunakan asumsi aktuaria berdasarkan asumsi estimasi terbaik dan margin atas risiko pemburukan, kecuali untuk asumsi biaya (untuk bisnis Konvensional) dan asumsi tingkat bunga, sehingga tes kecukupan liabilitas perlu dilakukan. Berdasarkan hasil uji, estimasi liabilitas lebih tinggi dari estimasi arus kas yang memenuhi persyaratan minimum yang menunjukan bahwa estimasi liabilitas tersebut cukup.

Pengakuan pendapatan premi

Premi kontrak jangka pendek diakui sebagai pendapatan dalam periode kontrak sesuai dengan proporsi total proteksi asuransi yang diberikan. Premi kontrak jangka panjang diakui sebagai pendapatan pada saat polis jatuh tempo.

Pendapatan premi yang diterima sebelum jatuh tempo polis dicatat sebagai titipan premi di laporan posisi keuangan.

Premi reasuransi bruto diakui sebagai beban pada saat dibayarkan atau pada tanggal di mana polis tersebut efektif.

Grup menghitung cadangan atas premi yang belum merupakan pendapatan dengan menggunakan metode amortisasi harian.

Cadangan atas premi yang belum merupakan pendapatan hanya diterapkan terhadap premi yang mempunyai risiko (asuransi jangka warsa, kecelakaan diri, dan kesehatan) yang periode asuransinya tidak lebih dari satu tahun.

Penurunan/(kenaikan) cadangan atas premi yang belum merupakan pendapatan diakui dalam laporan laba rugi periode berjalan.

Ujrah/*fee* yang diterima oleh Grup diakui sebagai pendapatan dalam laporan laba rugi dan penghasilan komprehensif lain. Ujrah diamortisasi menggunakan metode garis lurus.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contract** (continued)*

Liability adequacy tests (continued)

Group applies the Gross Premium Valuation method to calculate the liability for future policy benefit based on actuarial assumptions which are based on best estimate assumptions and margin for adverse deviation, except for expense assumptions (for Conventional business) and interest rate assumptions, therefore, the liability adequacy test is required. Based on the assessment, the estimated liability is higher than the measure of cash flows that meet the minimum requirement which shows that the estimated liability is adequate.

Premium income recognition

Premiums received from short-term insurance contracts are recognised as income within the contract period based on the insurance coverage provided. Premium income from long duration contracts is recognised as revenue when the policy is due.

Premium income received before the due date of the respective policies are reported as policyholders' deposits in the statement of financial position.

Gross reinsurance premiums are recognised as an expense when payable or on the date in which the policy becomes effective.

The Group calculates unearned premium reserves using daily amortization method.

Unearned premium reserves only apply to premiums that are short-term with less than one year insurance period which have risk component only (term life, personal accident, and health insurance).

Decrease/(increase) in unearned premium reserves is recognised in the current year's profit or loss.

Ujrah/fee received by the Group is recognised as income in the statement of profit or loss and other comprehensive income. Ujrah is amortised using straight-line method.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

Reasuransi

Grup mereasuransikan sebagian porsi risikonya kepada perusahaan reasuradur. Total premi yang dibayar atau porsi premi atas transaksi reasuransi prospektif diakui sesuai dengan proporsi total proteksi reasuransi yang diterima berdasarkan kontrak reasuransi.

Aset reasuransi termasuk saldo yang diharapkan dibayarkan oleh perusahaan reasuransi untuk *ceded* liabilitas manfaat polis masa depan, *ceded* estimasi liabilitas klaim dan *ceded* premi yang belum merupakan pendapatan. Total manfaat yang ditanggung oleh reasuradur diperkirakan secara konsisten sesuai dengan liabilitas yang terkait dengan polis reasuransi.

Jika aset reasuransi mengalami penurunan nilai, Grup mengurangi nilai tercatat dan mengakui kerugian penurunan nilai tersebut dalam laporan laba rugi dan penghasilan komprehensif lain konsolidasian. Aset reasuransi mengalami penurunan nilai jika ada bukti obyektif, sebagai akibat dari suatu peristiwa yang terjadi setelah pengakuan awal aset reasuransi, bahwa Grup tidak dapat menerima seluruh total karena di bawah syarat-syarat kontrak, dan dampak pada total yang akan diterima dari reasuradur dapat diukur secara andal.

Klaim dan manfaat polis

Klaim dan manfaat polis terdiri dari klaim yang telah diselesaikan, klaim dalam proses penyelesaian dan estimasi atas klaim yang telah terjadi namun belum dilaporkan (IBNR). Klaim dan manfaat polis diakui sebagai beban pada saat terjadinya liabilitas untuk memberikan proteksi. Klaim reasuransi yang diperoleh dari Grup diakui dan dicatat sebagai pengurang klaim dan manfaat polis pada periode yang sama dengan periode pengakuan klaim dan manfaat polis.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contract** (continued)*

Reinsurance

Group reinsures a portion of its risk with reinsurance companies. The amount of premium paid or portion of premium from prospective reinsurance transactions is recognised over the reinsurance contract in proportion with the protection received.

Reinsurance assets include balances expected to be recovered from reinsurance companies for ceded liability for future policy benefits, ceded estimated claim liabilities and ceded unearned premiums. Amounts recoverable from reinsurers are estimated in a manner consistent with the liability associated with the reinsured policy.

If a reinsurance asset is impaired, Group reduces the carrying amount and recognises the impairment loss in the consolidated statement of profit or loss and other comprehensive income. A reinsurance asset is impaired if there is objective evidence, as a result of an event that occurred after initial recognition of the reinsurance asset, that Group may not receive all amounts due to it under the terms of the contract, and the impact of the amounts that will receive from the reinsurer can be reliably measured.

Claims and policy benefits

Claims and policy benefits consist of settled claims, claims that are still in process of completion and estimate of claims incurred but not yet reported (IBNR). Claims and policy benefits are recognised as expenses when the liabilities to cover claims are incurred. Reinsurance claims recoveries from reinsurance Group are recognised and recorded as deduction from claims and policy benefits consistent in the same period with the claims and policies benefits recognition.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

Klaim dan manfaat polis (lanjutan)

Total klaim dalam penyelesaian, termasuk klaim yang telah terjadi namun belum dilaporkan, dinyatakan berdasarkan estimasi menggunakan teknik perhitungan teknis oleh aktuaris yang dilaporkan sebagai bagian dari ”Estimasi liabilitas klaim” yang diakui pada laporan keuangan konsolidasian di liabilitas lain-lain. Perubahan dalam estimasi liabilitas klaim, sebagai hasil dari evaluasi lebih lanjut dan perbedaan antara estimasi klaim dengan klaim yang dibayarkan, diakui sebagai biaya tambahan atau pengurang biaya pada periode terjadinya perubahan.

Utang klaim

Utang klaim merupakan liabilitas yang timbul dari klaim yang diajukan oleh pemegang polis dan disetujui oleh Grup tetapi belum dibayar hingga tanggal laporan posisi keuangan. Utang klaim diakui pada saat total yang harus dibayar disetujui. Liabilitas tersebut dihentikan pengakuannya pada saat kontrak berakhir, dilepaskan atau dibatalkan.

Liabilitas manfaat polis masa depan

Liabilitas manfaat polis masa depan merupakan nilai sekarang estimasi manfaat polis masa depan yang akan dibayarkan kepada pemegang polis atau ahli warisnya dikurangi dengan nilai sekarang dari estimasi premi masa depan yang akan diterima dari pemegang polis dan diakui secara konsisten pada saat pengakuan pendapatan premi. Liabilitas manfaat polis masa depan ditentukan dan dihitung dengan menggunakan rumus tertentu oleh aktuaris Grup.

Grup menghitung liabilitas manfaat polis masa depan dengan menggunakan metode *Gross Premium Valuation* yang mencerminkan nilai sekarang estimasi pembayaran seluruh manfaat yang diperjanjikan termasuk seluruh opsi yang disediakan, nilai sekarang estimasi seluruh biaya yang dikeluarkan dan juga mempertimbangkan penerimaan premi di masa depan.

Perubahan liabilitas manfaat polis masa depan diakui dalam laba rugi tahun berjalan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contract** (continued)*

Claims and policy benefits (continued)

Total claims in process, including claims incurred but not yet reported, are stated at estimated amounts determined based on the actuarial technical insurance calculations which is reported as part of “Estimated claim liabilities” which recognised in the consolidated statement of financial position in other liabilities. Changes in estimated claim liabilities as a result of further evaluation and the difference between estimated claims and paid claims are recognised as addition to or deduction from expenses in the period the changes occurred.

Claims payable

Claims payable represents liability arising from the submitted claim by policyholders and approved by the Group but not yet paid as of statement of financial position date. Claims payable is recognised at the time the amount to be paid is approved. The liability is derecognised when the contract expires, discharged or cancelled.

Liability for future policy benefits

The liabilities for future policy benefits represent the present value of estimated future policy benefits to be paid to policyholders or their heirs less present value of estimated future premiums to be received from the policyholders and recognised consistently with the recognition of premium income. The liabilities for future policy benefits are determined and computed based on certain formula by Group’s actuary.

Group calculates the liabilities for future policy benefits using Gross Premium Valuation method that reflect the present value of estimated payments throughout the guaranteed benefits including all the embedded options available, the estimated present value of all handling costs incurred and also considering the future premium receipt.

Changes in the liabilities for future policy benefits are recognised in the current year’s profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

Liabilitas manfaat polis masa depan (lanjutan)

Untuk produk *unit link*, liabilitas kepada pemegang polis *unit link* diakui pada saat penerimaan dana dikonversi menjadi unit setelah dikurangi biaya-biaya dan akan bertambah atau berkurang sesuai dengan nilai aset bersih efektif yang berlaku. Risiko investasi terkait ditanggung oleh pemegang polis *unit link*.

Penerimaan dana dari nasabah untuk produk non syariah diakui sebagai pendapatan premi bruto di laporan laba rugi dan penghasilan komprehensif lain konsolidasian. Liabilitas kepada pemegang polis *unit link* diakui di laporan posisi keuangan konsolidasian di liabilitas lain-lain yang termasuk di dalam liabilitas manfaat polis masa depan sebesar jumlah yang diterima setelah dikurangi dengan bagian premi yang merupakan pendapatan Entitas Anak, disertai dengan pengakuan kenaikan liabilitas kepada pemegang polis *unit link* di laba rugi.

Setiap bunga, keuntungan atau kerugian dari kenaikan atau penurunan nilai pasar investasi dicatat sebagai pendapatan atau beban, disertai dengan pengakuan kenaikan atau penurunan liabilitas manfaat polis masa depan di laporan laba rugi dan liabilitas manfaat polis masa depan di laporan posisi keuangan konsolidasian.

Penerimaan dana dari nasabah untuk produk *unit link* diakui sebagai liabilitas manfaat polis masa depan (diakui di liabilitas lain-lain) dan di laporan posisi keuangan sebesar total yang diterima setelah dikurangi *charges* atau *admin fee* lainnya dalam rangka mengelola pendapatan dari produk *unit link*.

z. Perpajakan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang diakui di penghasilan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam penghasilan komprehensif lain atau ekuitas.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contract** (continued)*

Liabilities for future policy benefits (continued)

For unit-linked products, the liabilities to unit-linked policyholders is recognised at the time the funds received are converted into units, net of related expenses and will increase or decrease in accordance with effective net asset value. Related investment risk are born by the unit-linked policyholders.

Funds received from customers for non-sharia products are recognised as gross premiums income in the consolidated statement of profit and loss and other comprehensive income. Liabilities to unit-linked policyholders are recognised in the consolidated statement of financial position in the other liabilities which is included in the liabilities for future policy benefits for the amount received net of the portion of premium representing Subsidiary's revenue, with corresponding profit or loss recognition for the increase in liabilities to unit-linked policyholders.

Any interest, gain or loss due to increases or decreases in market value of investments are recorded as income or expense, with a corresponding recognition of increase or decrease in liabilities for future policy benefits in the profit or loss and liabilities for future policy benefits in the consolidated statement of financial position.

Funds received from customers for unit-linked products are recognised as liabilities for future policy benefits (recognised in other liabilities) in the consolidated statement of financial position for the amount received net of charges or other admin fee in managing the unit-linked product revenue.

z. Taxation

The tax expense comprises of current and deferred tax. Tax are recognised in the profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

z. Perpajakan (lanjutan)

Beban pajak kini dihitung berdasarkan peraturan perpajakan yang berlaku pada tanggal pelaporan keuangan. Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan (SPT) sehubungan dengan situasi dimana aturan pajak yang berlaku membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

Pajak penghasilan tangguhan diakui, dengan menggunakan metode posisi keuangan untuk semua perbedaan temporer antara dasar pengenaan pajak aset dan liabilitas dengan nilai tercatatnya pada laporan keuangan konsolidasian. Namun, liabilitas pajak penghasilan tangguhan tidak diakui jika berasal dari pengakuan awal *goodwill* atau pada saat pengakuan awal aset dan liabilitas yang timbul dari transaksi selain kombinasi bisnis yang pada saat transaksi tersebut tidak mempengaruhi laba rugi akuntansi dan laba rugi kena pajak. Pajak penghasilan tangguhan ditentukan dengan menggunakan tarif pajak yang telah berlaku atau secara substantif telah berlaku pada akhir periode pelaporan dan diharapkan diterapkan ketika aset pajak penghasilan tangguhan direalisasi atau liabilitas pajak penghasilan tangguhan diselesaikan.

Aset pajak penghasilan tangguhan diakui hanya jika besar kemungkinan jumlah penghasilan kena pajak dimasa depan akan memadai untuk dikompensasi dengan perbedaan temporer yang masih dapat dimanfaatkan.

Aset dan liabilitas pajak penghasilan tangguhan dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus antara aset pajak kini dengan liabilitas pajak kini dan apabila aset dan liabilitas pajak penghasilan tangguhan dikenakan oleh otoritas perpajakan yang sama, baik atas entitas kena pajak yang sama ataupun berbeda dan adanya niat untuk melakukan penyelesaian saldo-saldo tersebut secara neto.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***z. Taxation** (continued)*

The current income tax charge is calculated on the basis of the tax laws enacted or substantively enacted at the reporting date. Management periodically evaluates positions taken in tax returns with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provision where appropriate on the basis of amounts expected to be paid to the tax authorities.

Deferred income tax is recognised, using the financial position method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the consolidated financial statements. However, deferred tax liabilities are not recognised if they arise from the initial recognition of goodwill and deferred income tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit or loss. Deferred income tax is determined using tax rates that have been enacted or substantially enacted as at reporting period and is expected to apply when the related deferred income tax asset is realised or the deferred income tax liability is settled.

Deferred tax assets are recognised only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when the deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority either the same taxable entity or different taxable entities where there is an intention to settle the balances on a net basis.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

z. Perpajakan (lanjutan)

Koreksi terhadap kewajiban perpajakan diakui saat surat ketetapan pajak diterima atau jika mengajukan keberatan, pada saat keputusan atas keberatan tersebut telah ditetapkan.

aa. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

Imbalan pensiun dan imbalan pasca-kerja lainnya

BNI memiliki program pensiun imbalan pasti dan iuran pasti.

Program pensiun imbalan pasti adalah program pensiun yang menetapkan jumlah imbalan pensiun yang akan diterima oleh karyawan pada saat pensiun, yang biasanya tergantung pada satu faktor atau lebih, seperti umur, masa kerja, dan jumlah kompensasi. Program ini dikelola oleh Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun").

Program pensiun iuran pasti adalah program pensiun dimana Bank akan membayar iuran tetap kepada sebuah entitas yang terpisah (dana pensiun) dan tidak memiliki liabilitas hukum atau konstruktif untuk membayar kontribusi lebih lanjut. Program ini dikelola oleh Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk ("DPLK").

BNI diharuskan menyediakan imbalan pensiun minimum yang diatur dalam Undang-Undang Cipta Kerja No. 11/2020 dan PP 35/2021, yang merupakan liabilitas imbalan pasti. Jika imbalan pensiun sesuai dengan Undang-Undang Cipta Kerja No. 11/2020 dan PP 35/2021 lebih besar, selisih tersebut diakui sebagai bagian dari liabilitas imbalan pensiun.

Karena Undang-Undang Cipta Kerja menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, pada dasarnya program pensiun berdasarkan Undang-Undang Cipta Kerja adalah program imbalan pasti.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***z. Taxation** (continued)*

Corrections to taxation obligations are recorded when an assessment is received or, if appealed against, when the appeal has been decided.

aa. Employee benefits

Short-term employee benefits

Short-term employee benefits are recognised when they accrued to the employees.

Pension benefits and other post-employment

BNI has defined benefit and defined contribution pension plans.

A defined benefit pension plan is a pension plan that defines an amount of pension that will be received by the employee on becoming entitled to a pension, which usually depends on one or more factors such as age, years of service and compensation. This plan is managed by Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun").

A defined contribution plan is a pension plan under which the Bank pays fixed contributions into a separate entity (pension fund) and has no legal or constructive obligation to pay further contributions. This plan is managed by Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero)Tbk ("DPLK").

BNI is required to provide minimum pension benefits as stipulated in Undang-Undang Cipta Kerja No. 11/2020 and PP 35/2021 which represents an underlying defined benefit obligation. If the pension benefits based on Undang-Undang Cipta Kerja No. 11/2020 and PP 35/2021 are higher, the difference is recorded as part of the overall pension benefits obligation.

Since the Undang-Undang Cipta Kerja sets the formula for determining the minimum amount of benefits, in substance pension plans under the Undang-Undang Cipta Kerja represent defined benefit plans.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

aa. Imbalan kerja (lanjutan)

Imbalan pensiun dan imbalan pasca-kerja lainnya (lanjutan)

Sehubungan dengan program imbalan pasti, liabilitas diakui pada laporan posisi keuangan konsolidasian sebesar nilai kini kewajiban imbalan pasti pada akhir periode pelaporan dikurangi nilai wajar aset program. Kewajiban imbalan pasti dihitung setiap tahun oleh aktuaris yang independen dengan menggunakan metode *projected unit credit*.

Nilai kini kewajiban imbalan pasti ditentukan dengan mendiskontokan arus kas keluar yang diestimasi dengan menggunakan tingkat bunga Obligasi Pemerintah (dikarenakan saat ini tidak ada pasar aktif untuk obligasi perusahaan yang berkualitas tinggi) yang didenominasikan dalam Rupiah dimana imbalan akan dibayarkan dan memiliki jangka waktu jatuh tempo mendekati jangka waktu kewajiban pensiun.

Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial langsung diakui seluruhnya melalui penghasilan komprehensif lainnya pada saat terjadinya.

Biaya jasa lalu diakui segera dalam laporan laba rugi.

Keuntungan dan kerugian dari kurtailmen atau penyelesaian program manfaat pasti diakui di laba rugi ketika kurtailmen atau penyelesaian tersebut terjadi.

Grup juga memberikan imbalan pasca kerja lainnya, seperti uang penghargaan dan uang pisah. Imbalan berupa uang penghargaan diberikan apabila karyawan bekerja hingga mencapai usia pensiun. Sedangkan imbalan berupa uang pisah, dibayarkan kepada karyawan yang mengundurkan diri secara sukarela, setelah memenuhi minimal masa kerja tertentu. Imbalan ini dihitung dengan menggunakan metodologi yang sama dengan metodologi yang digunakan dalam perhitungan program pensiun imbalan pasti.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***aa. Employee benefits** (continued)*

***Pension benefits and other post-employment benefits** (continued)*

The liability recognised in the consolidated statement of financial position in respect of defined benefit pension plans is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method.

The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of Government Bonds (considering that currently there is no active market for high-quality corporate bonds) that are denominated in Rupiah in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are charged or credited to equity in other comprehensive income in the period in which they arise.

Past-service costs are recognised immediately in profit or loss.

Gains or losses on the curtailment or settlement of a defined benefit plan are recognised in profit or loss when the curtailment or settlement occurs.

The Group also provides other post-employment benefits, such as service pay and separation pay. The service pay benefit vests when the employees reach their retirement age. The separation pay benefit is paid to employees in the case of voluntary resignation, subject to a minimum number of years of service. These benefits have been accounted for using the same methodology as for the defined benefit pension plan.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

aa. Imbalan kerja (lanjutan)

Imbalan jangka panjang lainnya

Imbalan jangka panjang lainnya seperti cuti berimbalan jangka panjang, imbalan cacat permanen dan penghargaan *jubilee* dihitung dengan menggunakan metode *projected unit credit* dan didiskontokan ke nilai kini. Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial diakui dalam laporan laba rugi.

ab. Laba per saham dasar

Laba bersih per saham dasar dihitung dengan membagi laba bersih yang tersedia bagi pemilik entitas induk dengan jumlah rata-rata tertimbang saham biasa yang beredar selama periode yang bersangkutan.

ac. Transaksi dengan pihak-pihak berelasi

BNI dan Entitas Anak melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam PSAK 224 tentang "Pengungkapan Pihak-pihak Berelasi" dan Peraturan Bapepam-LK No. KEP-347/BL/2012 tanggal 25 Juni 2012 tentang "Pedoman Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik" yang didefinisikan antara lain:

(i) perusahaan di bawah pengendalian BNI dan Entitas Anak;
(ii) perusahaan asosiasi;
(iii) investor yang memiliki hak suara, yang memberikan investor tersebut suatu pengaruh yang signifikan;
(iv) perusahaan di bawah pengendalian investor yang dijelaskan dalam Catatan iii di atas;
(v) karyawan kunci dan anggota keluarganya; dan
(vi) entitas yang dikendalikan, dikendalikan bersama atau dipengaruhi secara signifikan oleh Pemerintah yaitu Menteri Keuangan yang merupakan pemegang saham dari entitas.

Semua transaksi signifikan dengan pihak-pihak berelasi, telah diungkapkan pada catatan atas laporan keuangan konsolidasian.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

aa. Employee benefits *(continued)*

Other long-term benefits

Other long-term employee benefits such as long service leave, permanent disability benefit and jubilee awards are calculated using the projected unit credit method and discounted to present value. Actuarial gains and losses arising from experience adjustments and change in actuarial assumption are recognised and credited to profit or loss.

ab. Basic earnings per share

Basic earnings per share are computed by dividing the profit attributable to the equity holders of the parent entity by the weighted average number of ordinary shares outstanding during the period.

ac. Transactions with related parties

BNI and Subsidiaries enter into transactions with parties which are defined as related parties in accordance with SFAS 224 regarding "Related Party Disclosures" and Regulation of the Capital Market and Financial Institution Supervisory Board (Bapepam-LK) No. KEP-347/BL/2012 dated 25 June 2012 regarding "Guidelines for Financial Statements Presentation and Disclosure of Issuers or Public Companies", which are defined, among others, as:

(i) entities under the control of BNI and Subsidiaries;
(ii) associated companies;
(iii) investors with voting rights that gives them significant influence;
(iv) entities controlled by investors under Note iii above;
(v) key employees and family members; and
(vi) entity that is controlled, jointly controlled or significantly influenced by Government, which is defined as the Minister of Finance who has share ownership in the entity.

All significant transactions with related parties have been disclosed in notes to the consolidated financial statements.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ad. Dividen

Pembagian dividen kepada para pemegang saham diakui sebagai liabilitas dalam laporan keuangan konsolidasian pada periode ketika dividen tersebut disetujui oleh para pemegang saham.

ae. Pelaporan segmen

Grup mengidentifikasikan segmen operasi sebagai suatu komponen dari entitas:

a) yang terlibat dalam aktivitas bisnis yang mana memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban terkait dengan transaksi dengan komponen lain dari entitas yang sama);
b) hasil operasinya dikaji ulang secara reguler oleh pengambil keputusan operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
c) tersedia informasi keuangan yang dapat dipisahkan.

Sesuai dengan PSAK 108 tentang "Segmen Operasi", Grup menyajikan segmen operasi berdasarkan laporan internal Grup yang disajikan kepada pengambil keputusan operasional. Pengambil keputusan operasional adalah Direksi.

Di tahun 2024, Grup mengungkapkan segmen operasionalnya berdasarkan segmen usaha sebagai berikut: *Wholesale & International Banking, Institutional Banking, Enterprises & Commercial Banking, Retail Banking, Treasury*, Kantor Pusat dan Entitas Anak dengan terdapat reklasifikasi di masing-masing bisnis segmen sesuai dengan organisasi direksi dan pembidangan yang baru.

af. Biaya emisi penerbitan saham

Biaya-biaya emisi efek yang terjadi sehubungan dengan penawaran saham kepada masyarakat (termasuk penerbitan hak memesan efek terlebih dahulu) dikurangkan langsung dari hasil emisi dan disajikan sebagai pengurang pada akun "Tambahan Modal Disetor - Bersih", sebagai bagian dari Ekuitas pada laporan posisi keuangan konsolidasian.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

ad. Dividends

Dividend distribution to the shareholders is recognised as a liability in the consolidated financial statements in the period in which the dividends are approved by the shareholders.

ae. Segment reporting

The Group defines an operating segment as a component of an entity:

a) that engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the same entity);

b) whose operating results are reviewed regularly by the entity's chief operating decision maker to make decisions about resources to be allocated to the segment and assess its performance; and

c) for which discrete financial information is available.

Refer to SFAS 108 about "Operating Segments", the Group discloses its operating segments based on Group's internal report presented to operation-decision makers. The operation-decision makers are the Board of Directors.

In 2024, the Group disclosing its operational segments based on business segments as follows: Wholesale & International Banking, Institutional Banking, Enterprises & Commercial Banking, Retail Banking, Treasury, Head Office and Subsidiaries with some reclassification for each business segments referring to the new organizational of board of directors.

af. Shares issuance costs

Costs related to the public offering of shares (including pre-emptive rights issue) are deducted from the proceeds and presented as a deduction of "Additional Paid-In Capital - Net" account, under Equity section in the consolidated statement of financial position.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ag. Saham treasuri

Ketika entitas Grup membeli modal saham ekuitas entitas (saham treasuri), imbalan yang dibayar, termasuk biaya tambahan yang secara langsung dapat diatribusikan (dikurangi pajak penghasilan) dikurangkan dari ekuitas yang diatribusikan kepada pemilik ekuitas entitas sampai saham tersebut dibatalkan atau diterbitkan kembali. Ketika saham biasa tersebut selanjutnya diterbitkan kembali, imbalan yang diterima, dikurangi biaya tambahan transaksi yang terkait dan dampak pajak penghasilan yang terkait dimasukkan kepada ekuitas yang dapat diatribusikan kepada pemilik ekuitas entitas.

ah. Kompensasi berbasis saham

Bank menjalankan program kompensasi berbasis saham dengan penyelesaian menggunakan ekuitas. Nilai wajar dari jasa karyawan yang dikompensasikan dengan saham Bank diakui sebagai beban di laporan laba rugi. Jumlah keseluruhan yang diakui sepanjang periode *vesting* ditentukan berdasarkan nilai wajar saham yang diberikan pada tanggal pemberian kompensasi.

ai. Tanggung Jawab Sosial dan Lingkungan

Berdasarkan PER-05/MBU/04/2021 tentang Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara tanggal 20 April 2021 sebagaimana diubah terakhir dengan PER1/MBU/03/2023 tentang Penugasan Khusus dan Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara tanggal 24 Maret 2023, istilah PKBL (Program Kemitraan dan Bina Lingkungan) tidak digunakan lagi dan diganti menjadi TJSL (Tanggung Jawab Sosial & Lingkungan). Alokasi dana tidak dialokasikan dari saldo laba berdasarkan hasil keputusan Rapat Umum Pemegang Saham (RUPS) akan tetapi diakui dan dibebankan ke laporan laba rugi dan penghasilan komprehensif lain konsolidasian tahun berjalan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

ag. Treasury shares

When any Group entity purchases the entity's equity share capital (treasury shares), the consideration paid, including any directly attributable incremental costs (net of income taxes) is deducted from equity attributable to the entity's equity holders until the shares are cancelled or reissued. When ordinary shares are subsequently reissued, any consideration received, net of any directly attributable incremental transaction costs and the related income tax effects, is included in equity attributable to the entity's equity holders.

ah. Share-based payment

Bank operates an equity-settled, share-based compensation plan. The fair value of the employee services received in exchange for the grant of shares is recognised as an expense in the statements of profit or loss. The total amount to be recognised over the vesting period is determined based on the fair value of the shares granted on the grant date.

ai. Social and Environmental Responsibility

Based on PER-05/MBU/04/2021 concerning Social and Environmental Responsibility Programs for State-Owned Enterprises dated 20 April 2021, as last amended by PER 1/MBU/03/2023 concerning Special Assignments and Social and Environmental Responsibility Programs for Owned Enterprises, 24 March 2023, the term PKBL (Partnership and Community Development Program) is no longer used and replaced with TJSL (Social and Environmental Responsibility). Allocation of funds is not made from retained earnings based on resolutions of the General Meeting of Shareholders (GMS), but is recognised and charged to the consolidated statement of profit or loss and other comprehensive income for the current year.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING

Beberapa estimasi dan asumsi dibuat dalam rangka penyusunan laporan keuangan konsolidasian dimana dibutuhkan pertimbangan manajemen dalam menentukan metodologi yang tepat untuk penilaian aset dan liabilitas.

Manajemen membuat estimasi dan asumsi yang berimplikasi pada pelaporan nilai aset dan liabilitas atas tahun keuangan satu tahun kedepan. Semua estimasi dan asumsi yang diharuskan oleh PSAK adalah estimasi terbaik yang didasarkan pada standar yang berlaku. Estimasi dan pertimbangan dievaluasi secara terus menerus dan berdasarkan pengalaman masa lalu dan faktor-faktor lain termasuk harapan atas kejadian yang akan datang.

Walaupun estimasi dan asumsi ini dibuat berdasarkan pengetahuan terbaik manajemen atas kejadian dan tindakan saat ini, hasil yang timbul mungkin berbeda dengan estimasi dan asumsi semula.

Sumber utama ketidakpastian estimasi:

a. Cadangan kerugian penurunan nilai aset keuangan

Kondisi spesifik *counterparty* yang mengalami penurunan nilai dalam pembentukan cadangan kerugian atas aset keuangan dievaluasi secara individu berdasarkan estimasi terbaik manajemen atas nilai kini arus kas yang diharapkan akan diterima, baik dari waktu dan jumlah. Dalam mengestimasi arus kas tersebut, manajemen membuat pertimbangan tentang situasi keuangan *counterparty* dan nilai realisasi bersih dari setiap agunan, serta probabilitas rata-rata tertimbang kerugian kredit. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan manfaat yang ada, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS

Certain estimates and assumptions are made in the preparation of the consolidated financial statements and these require management judgement in determining the appropriate methodology for valuation of assets and liabilities.

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. All estimates and assumptions required in conformity with SFAS are best estimates undertaken in accordance with the applicable standard. Estimates and judgements are evaluated on a continuous basis, and are based on past experiences and other factors, including expectations with regard to future events.

Although these estimates and assumptions are based on management's best knowledge of current events and activities, actual result may differ from those estimates and assumptions.

Key sources of estimation uncertainty:

a. Allowances for impairment losses of financial assets

In the calculation of allowance for impairment losses of financial assets, the specific condition of impaired counterparty is individually evaluated based on management's best estimate of the present value of the expected cash flows to be received, including both timing and amount. In estimating these cash flows, management makes judgements about the counterparty's financial situation and the net realizable value of any underlying collateral, including weighted average probability of credit losses. Each impaired asset is assessed on its merits, and the workout strategy and estimated cash flows considered recoverable.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi: (lanjutan)

a. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Perhitungan cadangan penurunan nilai kolektif meliputi kerugian kredit yang melekat dalam portofolio aset keuangan dengan karakteristik ekonomi yang sama, tetapi penurunan nilai secara individu belum dapat diidentifikasi. Dalam menilai kebutuhan untuk cadangan kolektif, manajemen mempertimbangkan faktor-faktor seperti kualitas kredit dan jenis produk. Guna membuat estimasi cadangan yang diperlukan, manajemen membuat asumsi untuk menentukan kerugian yang melekat, termasuk probabilitas rata-rata tertimbang kerugian kredit, *loss given default* dan *exposure of default,* dan untuk menentukan parameter input yang diperlukan, berdasarkan pengalaman masa lalu, kondisi ekonomi saat ini dan perkiraan kondisi ekonomi dimasa depan. Keakuratan penyisihan tergantung pada seberapa baik estimasi arus kas masa depan untuk cadangan *counterparty* tertentu dan asumsi model dan parameter yang digunakan dalam menentukan cadangan kolektif.

b. Menentukan nilai wajar instrumen keuangan

Dalam menentukan nilai wajar aset keuangan dan liabilitas yang tidak mempunyai harga pasar, Grup menggunakan teknik penilaian seperti yang dijelaskan dalam Catatan 2c. Untuk instrumen keuangan yang jarang diperdagangkan dan memiliki informasi harga yang terbatas, nilai wajar menjadi kurang objektif dan membutuhkan berbagai tingkat penilaian tergantung pada likuiditas, konsentrasi, faktor ketidakpastian pasar, asumsi harga dan risiko lainnya.

Masukan *(input)* untuk model ini berasal dari data pasar yang bisa diamati. Bila data pasar yang bisa diamati tersebut tidak tersedia, manajemen mempertimbangkan masukan dan asumsi diperlukan untuk menentukan nilai wajar. Pertimbangan tersebut mencakup *feedback* model atas likuiditas volatilitas untuk transaksi derivatif dan tingkat diskonto yang berjangka waktu panjang, tingkat pelunasan dipercepat dan asumsi tingkat gagal bayar.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS *(continued)*

Key sources of estimation uncertainty: (continued)

a. Allowances for impairment losses of financial assets *(continued)*

Collectively assessed impairment allowances cover credit losses inherent in portfolios of financial assets with similar economic characteristics, but the individually impaired items cannot yet be identified. In assessing the need for collective allowances, management considers factors such as credit quality and type of product. In order to estimate the required allowance, assumptions are made to define the way inherent losses are modelled, which include weighted average probability of default, loss given default and exposure at default, and to determine the required input parameters, based on historical experiences, current economic conditions and forecast on future economic condition. The accuracy of the allowances depends on how well these estimated future cash flows for specific counterparty allowances and the model assumptions and parameters are used in determining collective allowances.

b. Determining fair values of financial instruments

In determining the fair value for financial assets and financial liabilities for which there is no observable market price, the Group uses the valuation techniques as described in Note 2c. For financial instruments that are traded infrequently and there is a lack of price transparency, fair value is less objective and requires varying degrees of judgement depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument.

The input for this model comes from observable market data. When observable market data are not available, management considers necessary inputs and assumptions to determine the fair value. The above considerations include liquidity and volatility feedback model for derivative transactions and long term discount rate, the level of early payment and the level of default assumption.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi: (lanjutan)

c. Imbalan kerja karyawan

Nilai kini atas imbalan kerja karyawan tergantung dari banyaknya faktor yang dipertimbangkan oleh aktuaris berdasarkan beberapa asumsi. Perubahan atas asumsi-asumsi tersebut akan mempengaruhi *carrying amount* atas imbalan kerja karyawan.

Asumsi yang digunakan dalam menentukan biaya atau pendapatan bersih untuk imbalan kerja termasuk tingkat diskonto. Grup menentukan tingkat diskonto yang tepat pada setiap periode pelaporan. Ini merupakan tingkat suku bunga yang digunakan untuk menentukan nilai kini atas arus kas masa depan yang diestimasi akan digunakan untuk membayar imbalan kerja. Dalam menentukan tingkat diskonto yang tepat, Grup mempertimbangkan tingkat suku bunga atas Obligasi Pemerintah yang mempunyai jatuh tempo yang menyerupai jangka waktu imbalan kerja karyawan.

Asumsi kunci liabilitas pensiun lainnya sebagian ditentukan berdasarkan kondisi pasar saat ini.

d. Provisi perpajakan

Grup menentukan provisi perpajakan berdasarkan estimasi atas kemungkinan adanya tambahan beban pajak. Jika hasil akhir dari hal ini berbeda dengan jumlah yang dicatat semula, maka perbedaan tersebut akan berdampak terhadap laba/rugi.

e. Liabilitas asuransi untuk kontrak asuransi dan reasuransi aset

Aset yang timbul dari kontrak reasuransi juga dihitung dengan menggunakan asumsi-asumsi aktuarial tertentu. Selain itu, pemulihan aset ini dinilai secara periodik untuk memastikan bahwa jumlahnya mencerminkan jumlah yang pada akhirnya akan diterima, mempertimbangkan faktor-faktor seperti *counterparty* dan risiko kredit. Penurunan nilai diakui dimana terdapat bukti objektif bahwa Perusahaan tidak dapat menerima jumlah yang terhutang untuk itu dan jumlah ini dapat diukur secara andal.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS *(continued)*

Key sources of estimation uncertainty: (continued)

c. Employee benefit

The present value of the employee benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions. Any changes in these assumptions will impact the carrying amount of employee benefit obligations.

The assumptions used in determining the net cost or for employee benefits include the discount rate. The Group determines the appropriate discount rate at the end of each reporting period. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the pension obligations. In determining the appropriate discount rate, the Group considers the interest rates of Government Bonds that have terms to maturity approximating the terms of the related employee benefit liability.

Other key assumptions for pension obligations are partly based on current market conditions.

d. Provision for taxes

The Group provides for tax provision based on estimates whether the additional taxes will be due. Where the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will impact the profit/loss.

e. Insurance liabilities on insurance contracts and reissuance assets

Assets arising from reinsurance contracts are also computed using certain actuarial assumptions. In addition, the recoverability of these assets is assessed on a periodic basis to ensure that the balance is reflective of the amounts that will ultimately be received, taking into consideration factors such as counterparty and credit risk. Impairment is recognised where there is objective evidence that the Company may not receive amounts due to it and these amounts can be reliably measured.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi: (lanjutan)

e. Liabilitas asuransi untuk kontrak asuransi dan reasuransi aset (lanjutan)

Cadangan teknis Entitas Anak dicatat di laporan posisi keuangan konsolidasian sebagai bagian dari "Liabilitas lain-lain" berdasarkan perhitungan teknis asuransi dengan menggunakan asumsi-asumsi aktuarial yaitu asumsi estimasi terbaik dan margin atas risiko pemburukan. Termasuk dalam cadangan teknis adalah liabilitas manfaat polis masa depan, estimasi liabilitas klaim, dan premi yang belum merupakan pendapatan. Entitas Anak menggunakan metode *Gross Premium Valuation* yang menghitung liabilitas manfaat polis masa depan berdasarkan asumsi estimasi terbaik dan margin atas risiko pemburukan.

f. Aset pajak tangguhan

Aset pajak tangguhan diakui atas jumlah pajak penghasilan terpulihkan (*recoverable*) pada periode mendatang sebagai akibat perbedaan temporer yang boleh dikurangkan. Justifikasi manajemen diperlukan untuk menentukan jumlah aset pajak tangguhan yang dapat diakui, sesuai dengan waktu yang tepat dan tingkat laba fiskal di masa mendatang sejalan dengan strategi rencana perpajakan ke depan.

g. Revaluasi aset tetap

Revaluasi aset tetap Grup bergantung pada pemilihan asumsi yang digunakan oleh penilai independen dalam menghitung jumlah-jumlah tersebut. Asumsi tersebut termasuk antara lain: tingkat diskonto, nilai tukar, tingkat inflasi dan tingkat kenaikan pendapatan dan biaya. Grup berkeyakinan bahwa asumsi tersebut adalah wajar dan sesuai, perbedaan signifikan dalam asumsi yang ditetapkan Grup dapat mempengaruhi secara material nilai aset tetap yang direvaluasi.

h. Konsolidasian entitas terstruktur

Dalam menentukan tingkat pengendalian yang dimiliki, Grup mempertimbangkan apakah entitas tersebut memenuhi definisi Entitas Terstruktur dan apakah Grup, secara substansi, mengendalikan entitas tersebut.

Ketika Grup, secara substansi, mengendalikan entitas terstruktur tersebut, entitas tersebut dikonsolidasikan oleh Grup.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS *(continued)*

Key sources of estimation uncertainty: (continued)

e. Insurance liabilities on insurance contracts and reissuance assets *(continued)*

Technical reserves of the Subsidiary recorded in the consolidated statement of financial position as part of "Other liabilities" are calculated based on insurance technical calculation using certain actuarial assumptions which are based on best estimate assumptions and margin for adverse risk. Included in the technical reserves are liability for future policy benefits, estimated claim liabilities, and unearned premium income. The Subsidiary uses Gross Premium Valuation method in calculating liability for future policy benefits which are based on best estimate assumptions and margin for adverse risk.

f. Deferred tax asset

Deferred tax assets are recognized for the future recoverable taxable income arising from temporary difference. Management judgment is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing on level of future taxable profits together with future strategic planning.

g. Fixed asset revaluation

The Group's fixed assets revaluation depends on its selection of certain assumptions used by the independent appraisal in calculating such amounts. Those assumptions include among others: discount rate, exchange rate, inflation rate and revenue and cost increase rate. The Group believes that its assumptions are reasonable and appropriate and significant differences in the Group's assumptions may materially affect the valuation of its fixed assets.

h. Consolidation of structured entities

In determining the degree of control exercised, the Group considers whether these entities meet the definition of Structured Entities and whether the Group, in substance, controls such entities.

When the Group, in substance, controls the entity to which the financial assets have been transferred, the entity is consolidated by the Group.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi: (lanjutan)

i. Menentukan jangka waktu kontrak dengan opsi perpanjangan dan penghentian kontrak - Grup sebagai *lessee*

Grup menentukan jangka waktu sewa sebagai jangka waktu sewa yang tidak dapat dibatalkan, bersama dengan periode yang dicakup oleh opsi untuk memperpanjang masa sewa jika dipastikan akan dilaksanakan, atau periode apapun yang dicakup oleh opsi untuk menghentikan sewa, jika cukup wajar untuk tidak dilakukan.

Grup memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan penghentian jangka waktu sewa. Grup menerapkan penilaian dalam mengevaluasi apakah dapat dipastikan jika akan menggunakan opsi untuk memperpanjang atau menghentikan sewa. Hal tersebut dilakukan dengan mempertimbangkan seluruh fakta dan keadaan yang relevan yang memberikan insentif ekonomi untuk melakukan perpanjangan atau penghentian sewa. Setelah tanggal dimulainya, Grup menilai kembali masa sewa, jika terdapat peristiwa atau perubahan signifikan dalam keadaan yang berada dalam kendali dan mempengaruhi apakah *lessee* cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

j. Penurunan nilai aset non-keuangan

Grup mengevaluasi penurunan nilai aset apabila terdapat kejadian atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat aset tidak dapat dipulihkan kembali. Faktor-faktor penting yang dapat menyebabkan penelaahan penurunan nilai adalah sebagai berikut:

a) performa yang tidak tercapai secara signifikan terhadap ekspektasi historis atau proyeksi hasil operasi di masa yang akan datang;
b) perubahan yang signifikan dalam cara penggunaan aset atau strategi bisnis secara keseluruhan; dan
c) industri atau tren ekonomi yang secara signifikan bernilai negatif.

***3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS** (continued)*

Key sources of estimation uncertainty: (continued)

i. Determine the contract term with extension and contract termination options - the Group as lessee

The Group determines the lease term as non-cancellable term, together with the period covered by the option to extend the lease if it is determined to be exercised, or any period covered by the option to terminate the lease, if it is reasonably certain not to be exercised.

The Group has several lease contracts that include extension and contract termination in the lease terms. The Group applies its judgment in evaluating whether it is certain to exercise the option to extend or terminate the lease. This is done by considering all relevant facts and circumstances that provide economic incentives to extend or terminate the lease. After the commencement date, the Group reassesses the lease term, if there is a significant event or change in circumstances which is under its control and affects whether the lessee is certain enough to exercise the option to extend or terminate the lease.

j. Impairment of non-financial assets

The Group assesses impairment of assets whenever events or changes in circumstances that would indicate that the carrying amount of an asset may not be recoverable. The factors that the Group considers important which could trigger an impairment review include the following:

a) significant underperformance relative to expected historical or projected future operating results;
b) significant changes in the manner of use of the acquired assets or the strategy for overall business; and
c) significant negative industry or economic trends.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi (lanjutan)

j. Penurunan nilai aset non-keuangan (lanjutan)

Grup mengakui kerugian penurunan nilai apabila nilai tercatat aset melebihi nilai yang dapat dipulihkan. Jumlah terpulihkan adalah nilai yang lebih tinggi antara nilai wajar dikurang biaya untuk menjual dengan nilai pakai aset (atau unit penghasil kas). Jumlah terpulihkan diestimasi untuk aset individual atau, jika tidak memungkinkan, untuk unit penghasil kas yang mana aset tersebut merupakan bagian daripada unit tersebut.

Pembalikan rugi penurunan nilai, untuk aset selain *goodwill*, diakui jika, dan hanya jika, terdapat perubahan estimasi yang digunakan dalam menentukan jumlah terpulihkan aset sejak pengujian penurunan nilai terakhir kali. Pembalikan rugi penurunan nilai tersebut diakui segera dalam laba rugi, tetapi tidak boleh melebihi akumulasi rugi penurunan nilai yang telah diakui sebelumnya. Rugi penurunan nilai yang diakui atas *goodwill* tidak dibalik lagi.

k. *Additional Tier 1 Perpetual Non-Cumulative Capital Securities ("AT-1 Capital")*

Dalam mengklasifikasikan *AT-1 Capital* sebagai liabilitas keuangan, Bank telah menetapkan bahwa dalam *terms and conditions*, terdapat klausul *mandatory redemption - redemption for a capital trigger event* dimana ketika *Capital Adequacy Ratio* ("CAR") BNI mencapai rasio tertentu maka BNI harus melakukan pelunasan terhadap pokok terutang dan bunga dari *AT-1 Capital*. Hal ini telah memenuhi kriteria *contingent settlement* yang bersifat *genuine* dan tidak dapat dihindari sehingga akan menimbulkan kewajiban kontraktual dimasa yang akan datang.

Dalam mengklasifikasikan *AT-1 Capital* pada liabilitas keuangan, Bank telah menetapkan bahwa *AT-1 Capital* tersebut telah memenuhi persyaratan klasifikasi sebagaimana disebutkan di atas.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS *(continued)*

Key sources of estimation uncertainty (continued)

j. Impairment of non-financial assets *(continued*

The Group recognizes an impairment loss whenever the carrying amount of an asset exceeds its recoverable amount. The recoverable amount is the higher of an asset's (or cash-generating unit's) fair value less costs to sell and its value in use. Recoverable amounts are estimated for individual assets or, if it is not possible, for the cash-generating unit to which the asset belongs.

Reversal on impairment loss for assets other than goodwill would be recognized if, and only if, there has been a change in the estimates used to determine the assets' recoverable amount since the last impairment test was carried out. Reversal on impairment losses will be immediately recognized in profit or loss, but not in excess of any accumulated impairment loss previously recognized. Impairment losses relating to goodwill would not be reversed.

k. Additional Tier 1 Perpetual Non-Cumulative Capital Securities ("AT-1 Capital")

In classifying AT-1 Capital as a financial liability, the Bank has determined that in terms and conditions, there is a mandatory redemption clause - redemption for a capital trigger event where when BNI's Capital Adequacy Ratio ("CAR") reaches a certain ratio, BNI shall repay the outstanding principal and interest from AT-1 Capital. This has met the criteria for contingent settlement which is genuine and unavoidable hence that it will create contractual obligations in the future.

In classifying AT-1 Capital as a financial liability, the Bank has determined that the AT-1 Capital has met the classification requirements as stated above.

4. KAS / *4. CASH*

Kas terdiri dari: / *Cash consists of the following:*

	2024	2023	
Rupiah	12,614,225	10,389,188	*Rupiah*
Mata uang asing			*Foreign currencies*
Dolar Amerika Serikat	649,059	415,467	*United States Dollar*
Dolar Singapura	257,628	206,643	*Singapore Dollar*
Euro Eropa	53,413	59,168	*European Euro*
Real Arab Saudi	27,076	6,232	*Saudi Arabian Real*
Dolar Australia	23,560	39,827	*Australian Dollar*
Pound Sterling Inggris	19,569	37,973	*Great Britain Pound Sterling*
Dolar Hong Kong	18,310	12,288	*Hong Kong Dollar*
Franc Swiss	11,385	12,709	*Swiss Franc*
Dolar Kanada	8,248	4,299	*Canadian Dollar*
Dirham Uni Emirat Arab	8,029	4,241	*United Arab Emirates Dirham*
Yen Jepang	7,761	9,546	*Japanese Yen*
Yuan China	5,567	3,025	*Chinese Yuan*
Dolar Brunei	2,474	3,073	*Brunei Dollar*
Ringgit Malaysia	1,463	1,135	*Malaysian Ringgit*
Dolar Selandia Baru	1,113	1,157	*New Zealand Dollar*
Won Korea Selatan	406	498	*South Korean Won*
Dolar Taiwan	358	322	*Taiwan Dollar*
Baht Thailand	286	242	*Thailand Baht*
Kroner Norwegia	-	168	*Norwegia Kroner*
	1,095,705	818,013	
	13,709,930	**11,207,201**	

Saldo dalam mata uang Rupiah termasuk uang pada mesin ATM (Anjungan Tunai Mandiri) sejumlah Rp4.690.396 dan Rp5.276.292 masing masing pada tanggal 31 Desember 2024 dan 2023.

The Rupiah balance includes cash in ATMs (Automatic Teller Machines) of Rp4,690,396 and Rp5,276,292 as of 31 December 2024 and 2023, respectively.

5. GIRO PADA BANK INDONESIA / *5. CURRENT ACCOUNTS WITH BANK INDONESIA*

	2024	2023	
Rupiah	43,716,990	57,794,759	*Rupiah*
Dolar Amerika Serikat	7,952,064	7,461,673	*United States Dollar*
	51,669,054	**65,256,432**	

Giro Wajib Minimum (GWM) Bank sesuai dengan Peraturan Bank Indonesia dan Peraturan Anggota Dewan Gubernur (PADG) diungkapkan pada Catatan 59a.

Minimum Statutory Reserves (GWM) Bank in accordance with Bank Indonesia (BI) Regulation Regulation of Members of The Board of Governors (PADG) are disclosed in Note 59a.

6. GIRO PADA BANK LAIN / *6. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan mata uang / *a. By currency*

	2024	2023	
Rupiah	192,342	602,104	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	10,015,639	23,651,471	*United States Dollar*
Yen Jepang	7,775,337	7,805,246	*Japanese Yen*
Dolar Singapura	1,511,752	692,266	*Singapore Dollar*
Yuan China	1,167,916	1,139,216	*Chinese Yuan*
Euro Eropa	791,024	675,304	*European Euro*
Won Korea Selatan	149,697	142,170	*South Korean Won*
Pound Sterling Inggris	121,862	88,676	*Great Britain Pound Sterling*
Dolar Australia	118,223	15,940	*Australian Dollar*
Real Arab Saudi	59,354	55,006	*Saudi Arabian Real*
Dirham Uni Emirat Arab	38,266	24,758	*United Arab Emirates Dirham*
Dolar Hong Kong	37,852	27,931	*Hong Kong Dollar*
Ringgit Malaysia	34,500	10,948	*Malaysian Ringgit*
Franc Swiss	24,730	62,049	*Swiss Franc*
Dolar Kanada	15,731	14,723	*Canadian Dollar*
Baht Thailand	11,717	7,368	*Thailand Baht*
Dolar Selandia Baru	8,244	7,593	*New Zealand Dollar*
	21,881,844	34,420,665	
Total	22,074,186	35,022,769	*Total*
Cadangan kerugian penurunan nilai	(13)	(7)	*Allowance for impairment losses*
	22,074,173	**35,022,762**	

b. Berdasarkan hubungan / *b. By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	25,703	34,202	*Rupiah*
Mata uang asing	17,271	18,052	*Foreign currencies*
Total pihak berelasi	42,974	52,254	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	166,639	567,902	*Rupiah*
Mata uang asing	21,864,573	34,402,613	*Foreign currencies*
Total pihak ketiga	22,031,212	34,970,515	*Total third parties*
Total	22,074,186	35,022,769	*Total*
Cadangan kerugian penurunan nilai	(13)	(7)	*Allowance for impairment losses*
	22,074,173	**35,022,762**	

6. GIRO PADA BANK LAIN (lanjutan)

c. Berdasarkan kolektibilitas sesuai Peraturan OJK

Kolektibilitas giro pada bank lain sesuai Peraturan OJK diungkapkan pada Catatan 59b.

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

6. CURRENT ACCOUNTS WITH OTHER BANKS *(continued)*

c. By Financial Service Authority Rule collectibility

Collectibility current accounts with other banks in accordance with Financial Service Authority Rule are disclosed in Note 59b.

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	35,022,769	-	-	35,022,769	*Beginning balance*
Pengukuran kembali bersih*)	65,872,596	-	-	65,872,596	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	17,167,228	-	-	17,167,228	*New financial assets originated or purchased*
Pembayaran penuh	(95,411,752)	-	-	(95,411,752)	*Fully repayment*
Valuta asing dan perubahan lain	(576,655)	-	-	(576,655)	*Foreign exchange and other movements*
	22,074,186	**-**	**-**	**22,074,186**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	15,921,876	-	-	15,921,876	*Beginning balance*
Pengukuran kembali bersih*)	104,944,568	-	-	104,944,568	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	19,969,895	-	-	19,969,895	*New financial assets originated or purchased*
Pembayaran penuh	(103,860,855)	-	-	(103,860,855)	*Fully repayment*
Valuta asing dan perubahan lain	(1,952,715)	-	-	(1,952,715)	*Foreign exchange and other movements*
	35,022,769	**-**	**-**	**35,022,769**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

6. GIRO PADA BANK LAIN (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

6. CURRENT ACCOUNTS WITH OTHER BANKS *(continued)*

d. Gross carrying amount and allowance for impairment losses *(continued)*

The movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	7	-	-	7	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	16	-	-	16	*Net remeasurement of loss allowance*
Pembayaran penuh	(12)	-	-	(12)	*Fully repayment*
Aset keuangan baru yang diterbitkan atau dibeli	2	-	-	2	*New financial assets originated or purchased*
	13	**-**	**-**	**13**	

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	8	-	-	8	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	8	-	-	8	*Net remeasurement of loss allowance*
Pembayaran penuh	(11)	-	-	(11)	*Fully repayment*
Aset keuangan baru yang diterbitkan atau dibeli	2	-	-	2	*New financial assets originated or purchased*
	7	**-**	**-**	**7**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai.

Management believes that the allowance for impairment losses is adequate.

6. GIRO PADA BANK LAIN (lanjutan)

6. CURRENT ACCOUNTS WITH OTHER BANKS *(continued)*

e. Tingkat suku bunga per tahun

e. Annual interest rates

	Dolar Amerika Serikat/ *United States Dollar* %	Yuan China/ *Chinese Yuan* %	Dolar Australia/ *Australian Dollar* %	
2024	0.00 - 4.25	0.00 - 0.75	0.00 - 1.55	*2024*
2023	0.00 - 5.40	0.00 - 0.25	-	*2023*

Giro pada bank lain selain dalam mata uang Dolar Amerika Serikat, Yuan China, dan Dolar Australia tidak mendapat bunga.

Current accounts with other banks stated in currency other than United States Dollar, Chinese Yuan, and Australian Dollar do not earn interest.

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA

a. Berdasarkan jenis dan mata uang

a. By type and currency

Perincian penempatan pada bank lain dan Bank Indonesia berdasarkan mata uang adalah sebagai berikut:

Placements with other banks and Bank Indonesia based on currencies are as follows:

	2024	2023	
Rupiah			***Rupiah***
Bank Indonesia - *Deposit Facility*	1,030,850	10,667,072	*Bank Indonesia - Deposit Facility*
Call Money			*Call Money*
PT Bank Danamon Indonesia Tbk	250,000	-	*PT Bank Danamon Indonesia Tbk*
PT Bank UOB Indonesia	250,000	-	*PT Bank UOB Indonesia*
Deutsche Bank AG.	184,780	89,873	*Deutsche Bank AG.*
PT Bank Mega Tbk	150,000	150,000	*PT Bank Mega Tbk*
PT Bank Maybank Indonesia Tbk	150,000	-	*PT Bank Maybank Indonesia Tbk*
PT Bank DKI	150,000	10,000	*PT Bank DKI*
PT Bank Pembangunan Daerah Jawa Tengah	100,000	-	*PT Bank Pembangunan Daerah Jawa Tengah*
PT China Construction Bank Indonesia Tbk	100,000	-	*PT China Construction Bank Indonesia Tbk*
PT Bank CIMB Niaga Tbk	100,000	-	*PT Bank CIMB Niaga Tbk*
PT Bank KB Bukopin Tbk	31,000	6,000	*PT Bank KB Bukopin Tbk*
PT Bank Victoria International Tbk	15,000	30,000	*PT Bank Victoria International Tbk*
PT Bank OCBC NISP Tbk	-	140,000	*PT Bank OCBC NISP Tbk*
Standard Chartered Indonesia	-	140,000	*Standard Chartered Indonesia*
PT Bank Pembangunan Daerah Jawa Timur Tbk	-	140,000	*PT Bank Pembangunan Daerah Jawa Timur Tbk*
PT Bank Pembangunan Daerah Sulawesi Selatan & Sulawesi Barat	-	100,000	*PT Bank Pembangunan Daerah Sulawesi Selatan & Sulawesi Barat*
Subtotal	1,480,780	805,873	*Subtotal*
Negotiable Certificate of Deposit			*Negotiable Certificate of Deposit*
PT Bank Tabungan Negara (Persero) Tbk	-	37,987	*PT Bank Tabungan Negara (Persero) Tbk*
Deposito berjangka	1,327,238	1,406,876	*Time deposits*
	3,838,868	12,917,808	

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan) / *PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *By type and currency (continued)*

Perincian penempatan pada bank lain dan Bank Indonesia berdasarkan mata uang adalah sebagai berikut: (lanjutan)

Placements with other banks and Bank Indonesia based on currencies are as follows: (continued)

	2024	2023	
Mata uang asing			***Foreign currencies***
Bank Indonesia - *Deposit Facility*	9,093,705	28,761,719	*Bank Indonesia - Deposit Facility*
Call Money			*Call Money*
JP Morgan Chase	498,977	96,273	*JP Morgan Chase*
PT Bank Syariah Indonesia Tbk	402,375	-	*PT Bank Syariah Indonesia Tbk*
Wachovia Bank	333,971	270,217	*Wachovia Bank*
Standard Chartered Bank, Jakarta	246,358	-	*Standard Chartered Bank, Jakarta*
Bank of New York Mellon	113,470	130,105	*Bank of New York Mellon*
PT Bank ICBC Indonesia	66,150	-	*PT Bank ICBC Indonesia*
PT Bank IBK Indonesia Tbk	-	61,588	*PT Bank IBK Indonesia Tbk*
Subtotal	1,661,301	558,183	*Subtotal*
Deposito berjangka			*Time deposits*
Canara Bank New York	885,225	-	*Canara Bank New York*
Woori Bank Seoul	784,815	527,096	*Woori Bank Seoul*
Bank Mandiri Cayman Island	321,900	-	*Bank Mandiri Cayman Island*
The Chugoku Bank Limited	160,950	153,970	*The Chugoku Bank Limited*
The San-In Godo Bank	160,950	153,970	*The San-In Godo Bank*
Bank Mandiri Europe	160,950	-	*Bank Mandiri Europe*
Standard Chartered Indonesia	4,142	181,498	*Standard Chartered Indonesia*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	2,829	-	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
BRI New York	-	384,925	*BRI New York*
Sumitomo Mitsui Banking Corp	-	76,985	*Sumitomo Mitsui Banking Corp*
Bank IBK Indonesia	-	76,985	*Bank IBK Indonesia*
PT Bank DBS Indonesia	-	1,125	*PT Bank DBS Indonesia*
Subtotal	2,481,761	1,556,554	*Subtotal*
	13,236,767	30,876,456	
Total	17,075,635	43,794,264	*Total*
Cadangan kerugian penurunan nilai	(194)	(98)	*Allowance for impairment losses*
	17,075,441	**43,794,166**	

Berdasarkan mata uang / ***By currency***

	2024	2023	
Rupiah	3,838,868	12,917,808	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	12,466,277	30,472,536	*United States Dollar*
Won Korea Selatan	704,340	403,920	*South Korean Won*
Yuan China	66,150	-	*Chinese Yuan*
	13,236,767	30,876,456	
Total	17,075,635	43,794,264	*Total*
Cadangan kerugian penurunan nilai	(194)	(98)	*Allowance for impairment losses*
	17,075,441	**43,794,166**	

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan) / *PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)*

b. Berdasarkan hubungan / *By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Deposito berjangka	734,966	787,709	*Time deposits*
Negotiable Certificate Deposit	-	37,987	*Negotiable Certificate Deposit*
	734,966	825,696	
Mata uang asing			***Foreign currencies***
Call Money	402,375	-	*Call Money*
Deposito Berjangka	482,850	384,925	*Time Deposits*
	885,225	384,925	
Total pihak berelasi	1,620,191	1,210,621	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Bank Indonesia - *Deposit Facility*	1,030,850	10,667,072	*Bank Indonesia - Deposit Facility*
Call Money	1,480,780	805,873	*Call Money*
Deposito berjangka	592,272	619,167	*Time deposits*
	3,103,902	12,092,112	
Mata uang asing			***Foreign currencies***
Bank Indonesia - *Deposit Facility*	9,093,705	28,761,719	*Bank Indonesia - Deposit Facility*
Deposito berjangka	1,998,911	1,171,629	*Time deposits*
Call Money	1,258,926	558,183	*Call Money*
	12,351,542	30,491,531	
Total pihak ketiga	15,455,444	42,583,643	*Total third parties*
Total	17,075,635	43,794,264	*Total*
Cadangan kerugian penurunan nilai	(194)	(98)	*Allowance for impairment losses*
	17,075,441	**43,794,166**	

c. Berdasarkan kolektibilitas sesuai Peraturan OJK / *By Financial Service Authority Rule collectibility*

Kolektibilitas penempatan pada bank lain dan Bank Indonesia sesuai Peraturan OJK diungkapkan pada Catatan 59c.

Collectibility placement with other bank and Bank Indonesia in accordance with Financial Service Authority Rule are disclosed in Note 59c.

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Penempatan pada bank lain dan Bank Indonesia					***Placements with other banks and Bank Indonesia***
Saldo awal	43,794,264	-	-	43,794,264	*Beginning balance*
Pengukuran kembali bersih*)	(311,889,914)	-	-	(311,889,914)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	285,196,141	-	-	285,196,141	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	(24,856)	-	-	(24,856)	*Foreign exchange and other movements*
	17,075,635	**-**	**-**	**17,075,635**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Penempatan pada bank lain dan Bank Indonesia					***Placements with other banks and Bank Indonesia***
Saldo awal	51,569,342	-	-	51,569,342	*Beginning balance*
Pengukuran kembali bersih*)	(421,698,466)	-	-	(421,698,466)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	413,896,608	-	-	413,896,608	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	26,780	-	-	26,780	*Foreign exchange and other movements*
	43,794,264	**-**	**-**	**43,794,264**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

***7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA** (continued)*

***d. Gross carrying amount and allowance for impairment losses** (continued)*

The movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Penempatan pada bank lain dan Bank Indonesia					***Placement with other banks and Bank Indonesia***
Saldo awal	98	-	-	98	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(164)	-	-	(164)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	260	-	-	260	*New financial assets originated or purchased*
	194	**-**	**-**	**194**	

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Penempatan pada bank lain dan Bank Indonesia					***Placement with other banks and Bank Indonesia***
Saldo awal	26	-	-	26	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(31)	-	-	(31)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	103	-	-	103	*New financial assets originated or purchased*
	98	**-**	**-**	**98**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses is adequate.

e. Penempatan pada bank lain dan Bank Indonesia yang digunakan sebagai jaminan

Tidak terdapat penempatan pada bank lain dan Bank Indonesia yang digunakan sebagai jaminan pada tanggal 31 Desember 2024 dan 2023.

e. Placements with other banks and Bank Indonesia pledged as collateral

There were no placements with other banks dan Bank Indonesia pledged as collateral as of 31 December 2024 and 2023.

f. Tingkat suku bunga per tahun

f. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	
2024	0.00 - 7.00	2.00 - 5.17	-	-	-	3.10 - 3.20	3.85	2024
2023	0.00 - 7.25	0.00 - 5.75	-	-	-	3.10 - 3.55	-	2023

8. EFEK-EFEK / *8. MARKETABLE SECURITIES*

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2024		2023		
	Nilai nominal/ *Nominal value*	Nilai tercatat/ *Carrying Value*	Nilai nominal/ *Nominal value*	Nilai tercatat/ *Carrying value*	
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Rupiah					***Rupiah***
Sekuritas Rupiah Bank Indonesia (SRBI)	2,553,060	2,848,847	2,606,364	2,548,772	*Bank Indonesia Rupiah Securities (SRBI)*
Reksadana	18,871,845	18,495,796	4,370,420	4,705,367	*Mutual funds*
Obligasi	1,071,102	1,296,808	627,942	642,116	*Bonds*
Obligasi subordinasi	119,500	121,725	263,300	268,932	*Subordinated bonds*
Efek lainnya*)	1,316,703	1,160,733	1,454,651	1,478,167	*Other securities*[*)]
	23,932,210	23,923,909	9,322,677	9,643,354	
Mata uang asing					***Foreign currencies***
Reksadana	20,581	35,705	31,756	39,562	*Mutual funds*
Sekuritas Valas Bank Indonesia (SVBI)	-	-	76,985	76,348	*Bank Indonesia Valas Securities (SVBI)*
	20,581	35,705	108,741	115,910	
Total nilai wajar melalui laba rugi	**23,952,791**	**23,959,614**	**9,431,418**	**9,759,264**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Rupiah					***Rupiah***
Reksadana	18,690,000	18,046,755	18,449,995	18,673,630	*Mutual funds*
Obligasi	4,618,744	4,414,877	5,317,136	5,373,190	*Bonds*
Obligasi subordinasi	235,300	230,581	336,500	338,136	*Subordinated bonds*
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	1,189,390	1,150,731	*Bank Indonesia Rupiah Securities (SRBI)*
	23,544,044	22,692,213	25,293,021	25,535,687	
Mata uang asing					***Foreign currencies***
Reksadana	804,750	789,302	769,850	780,243	*Mutual funds*
Obligasi	733,932	705,927	779,088	728,171	*Bonds*
	1,538,682	1,495,229	1,548,938	1,508,414	
Total nilai wajar melalui penghasilan komprehensif lain	**25,082,726**	**24,187,442**	**26,841,959**	**27,044,101**	***Total fair value through other comprehensive income***
Biaya perolehan diamortisasi					***Amortised cost***
Rupiah					***Rupiah***
Obligasi	300,000	300,000	600,000	542,790	*Bonds*
Efek lainnya	80	80	-	-	*Other securities*
	300,080	300,080	600,000	542,790	
Mata uang asing					***Foreign currencies***
Obligasi	64,380	64,339	61,588	61,525	*Bonds*
Efek lainnya	22,871	22,871	-	-	*Other securities*
	87,251	87,210	61,588	61,525	
Total biaya perolehan diamortisasi	**387,331**	**387,290**	**661,588**	**604,315**	***Total amortised cost***
Total efek-efek		**48,534,346**		**37,407,680**	***Total marketable securities***
Cadangan kerugian penurunan nilai		(273)		(242,941)	*Allowance for impairment losses*
		48,534,073		**37,164,739**	

*) Termasuk di dalam efek-efek lainnya adalah saham yang tercatat di bursa - dimiliki untuk diperdagangkan.

*) *Including in other securities are listed shares - held-for-trading.*

8. EFEK-EFEK (lanjutan) / *MARKETABLE SECURITIES (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *By type and currency (continued)*

Perincian efek-efek berdasarkan mata uang adalah sebagai berikut:

Marketable securities based on currencies are as follow:

	2024	2023	
Rupiah	46,916,202	35,721,831	*Rupiah*
Mata uang asing			*Foreign currency*
Dolar Amerika Serikat	1,618,144	1,685,849	*United States Dollar*
Total	48,534,346	37,407,680	*Total*
Cadangan kerugian penurunan nilai	(273)	(242,941)	*Allowance for impairment losses*
	48,534,073	**37,164,739**	

b. Berdasarkan hubungan / *By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	9,857,620	11,064,596	*Rupiah*
Mata uang asing	299,795	362,761	*Foreign currencies*
Total pihak berelasi	10,157,415	11,427,357	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	37,058,582	24,657,235	*Rupiah*
Mata uang asing	1,318,349	1,323,088	*Foreign currencies*
Total pihak ketiga	38,376,931	25,980,323	*Total third parties*
Total	48,534,346	37,407,680	*Total*
Cadangan kerugian penurunan nilai	(273)	(242,941)	*Allowance for impairment losses*
	48,534,073	**37,164,739**	

c. Berdasarkan penerbit / *By issuer*

	2024	2023	
Korporasi	27,992,999	30,645,586	*Corporates*
Bank Indonesia	18,495,796	3,775,851	*Bank Indonesia*
Bank	2,045,551	2,986,243	*Banks*
Total	48,534,346	37,407,680	*Total*
Cadangan kerugian penurunan nilai	(273)	(242,941)	*Allowance for impairment losses*
	48,534,073	**37,164,739**	

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat / *d. By rating*

	2024			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Nilai wajar melalui laba rugi				***Fair value through profit or loss***
Rupiah				***Rupiah***
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	18,495,796	*Bank Indonesia Rupiah Securities (SRBI)*
Reksadana	-	-	2,848,847	*Mutual funds*
Obligasi	Beragam/*Various*	Beragam/*Various*	1,296,808	*Bonds*
Obligasi subordinasi	Beragam/*Various*	Beragam/*Various*	121,725	*Subordinated bonds*
Efek lainnya	Beragam/*Various*	Beragam/*Various*	1,160,733	*Other securities*
Subtotal			23,923,909	*Subtotal*
Mata uang asing				***Foreign currencies***
Reksadana	-	-	35,705	*Mutual funds*
Subtotal			35,705	*Subtotal*
Total nilai wajar melalui laba rugi			**23,959,614**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain				***Fair value through other comprehensive income***
Rupiah				***Rupiah***
Reksadana	-	-	18,046,755	*Mutual funds*
Obligasi subordinasi				*Subordinated bonds*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	151,315	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank Pan Indonesia Tbk	Pefindo	idAA	68,469	*PT Bank Pan Indonesia Tbk*
PT Bank UOB Indonesia	Fitch	AAA(idn)	10,797	*PT Bank UOB Indonesia*
Subtotal			230,581	*Subtotal*
Obligasi				*Bonds*
PT Sarana Multigriya Finansial (Persero)	Pefindo	idAAA	958,662	*PT Sarana Multigriya Finansial (Persero)*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	547,490	*PT Perusahaan Listrik Negara (Persero)*
PT Bank Mandiri (Persero)Tbk	Pefindo	idAAA	431,283	*PT Bank Mandiri (Persero)Tbk*
PT Hutama Karya (Persero)	Pefindo	idAA-	386,870	*PT Hutama Karya (Persero)*
PT Chandra Asri Petrochemical Tbk	Pefindo	idAA-	321,884	*PT Chandra Asri Petrochemical Tbk*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	208,968	*PT Sarana Multi Infrastruktur (Persero)*
PT Indosat Tbk	Pefindo	idAAA	197,509	*PT Indosat Tbk*
PT Permodalan Nasional Madani	Pefindo	idAA+	153,314	*PT Permodalan Nasional Madani*
PT Mandiri Tunas Finance	Pefindo	idAAA	151,539	*PT Mandiri Tunas Finance*
PT Bank Rakyat Indonesia (Persero) Tbk	Pefindo	idAAA	119,588	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Merdeka Battery Materials Tbk	Pefindo	idA	100,080	*PT Merdeka Battery Materials Tbk*
PT XL Axiata Tbk	Pefindo	idAA-	98,009	*PT XL Axiata Tbk*
PT Pegadaian (Persero)	Pefindo	idAAA	97,965	*PT Pegadaian (Persero)*
PT Adira Dinamika Multi Finance Tbk	Pefindo	idAAA	81,513	*PT Adira Dinamika Multi Finance Tbk*
PT Mora Telematika Indonesia Tbk	Pefindo	idA+	83,110	*PT Mora Telematika Indonesia Tbk*
PT Maybank Indonesia Finance	Pefindo	idAAA	79,162	*PT Maybank Indonesia Finance*
PT Bank Pan Indonesia Tbk	Pefindo	idAA	54,969	*PT Bank Pan Indonesia Tbk*
PT Adhi Karya (Persero) Tbk	Pefindo	idA-	49,917	*PT Adhi Karya (Persero) Tbk*
PT Pupuk Indonesia (Persero)	Pefindo	idAAA	49,456	*PT Pupuk Indonesia (Persero)*
PT Kereta Api Indonesia (Persero)	Pefindo	idAAA	41,635	*PT Kereta Api Indonesia (Persero)*
PT Telkom Indonesia Tbk	Pefindo	idAAA	36,830	*PT Telkom Indonesia Tbk*
PT Indonesia Infrastructure Finance	Pefindo	idAAA	33,308	*PT Indonesia Infrastructure Finance*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	18,450	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank Tabungan Negara (Persero) Tbk	Pefindo	idAAA	15,961	*PT Bank Tabungan Negara (Persero) Tbk*
PT Astra Sedaya Finance	Pefindo	idAAA	14,574	*PT Astra Sedaya Finance*
PT Bank Syariah Indonesia Tbk	Pefindo	idAAA	11,879	*PT Bank Syariah Indonesia Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	70,951	*Others*
Subtotal			4,414,876	*Subtotal*
			22,692,212	

8. EFEK-EFEK (lanjutan) / ***8. MARKETABLE SECURITIES*** *(continued)*

d. Berdasarkan peringkat (lanjutan) / ***d. By rating*** *(continued)*

	2024			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Mata uang asing				***Foreign currencies***
Reksadana	-	-	789,303	*Mutual funds*
Obligasi				*Bonds*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	102,442	*PT Perusahaan Listrik Negara (Persero)*
Merrill Lynch & Co	Fitch	A	80,794	*Merrill Lynch & Co*
Wachovia Bank, N.A.	Beragam/*various*	Beragam/*various*	79,579	*Wachovia Bank, N.A.*
Suntrust Bank	Fitch	BB+	79,388	*Suntrust Bank*
M&T Bank Corporation	Beragam/*various*	Beragam/*various*	78,895	*M&T Bank Corporation*
JP Morgan Chase Bank, N.A.	Beragam/*various*	Beragam/*various*	77,228	*JP Morgan Chase Bank, N.A.*
The Huntington National Bank	Fitch	BB+	74,587	*The Huntington National Bank*
PT Pertamina (Persero)	Fitch	BBB	67,296	*PT Pertamina (Persero)*
PT Pelabuhan Indonesia (Persero)	Fitch	BBB	65,718	*PT Pelabuhan Indonesia (Persero)*
Subtotal			705,927	*Subtotal*
Subtotal			1,495,230	*Subtotal*
Total nilai wajar pada penghasilan komprehensif lain			**24,187,442**	***Total fair value through other comprehensive income***
Biaya perolehan diamortisasi				***Amortised cost***
Rupiah				***Rupiah***
Obligasi				*Bonds*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	200,000	*PT Sarana Multi Infrastruktur (Persero)*
PT Semen Indonesia (Persero) Tbk	Pefindo	idAAA	100,000	*PT Semen Indonesia (Persero) Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	80	*Others*
Subtotal			300,080	*Subtotal*
Mata uang asing				***Foreign currencies***
Obligasi				*Bonds*
PT Bank Mandiri (Persero) Tbk	Pefindo	idAAA	64,339	*PT Bank Mandiri (Persero) Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	22,871	*Others*
Subtotal			87,210	*Subtotal*
Total biaya perolehan diamortisasi			**387,290**	***Total amortised cost***
Total efek-efek			**48,534,346**	***Total marketable securities***
Cadangan kerugian penurunan nilai			(273)	*Allowance for impairment losses*
Efek-efek - bersih			**48,534,073**	***Marketable securities - net***

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat (lanjutan) / *d. By rating (continued)*

	2023			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Nilai wajar melalui laba rugi				***Fair value through profit or loss***
Rupiah				***Rupiah***
Reksadana	-	-	4,705,367	*Mutual funds*
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	2,548,772	*Issuing Bank Indonesia Rupiah Securities (SRBI)*
Obligasi	Beragam/*Various*	Beragam/*Various*	642,116	*Bonds*
Obligasi subordinasi	Beragam/*Various*	Beragam/*Various*	268,932	*Subordinated bonds*
Efek lainnya	Beragam/*Various*	Beragam/*Various*	1,478,167	*Other securities*
			9,643,354	
Mata uang asing				***Foreign currencies***
Sekuritas Valas Bank Indonesia (SVBI)	-	-	76,348	*Issuing Bank Indonesia Valas Securities (SVBI)*
Reksadana	-	-	39,562	*Mutual funds*
			115,910	
Total nilai wajar melalui laba rugi			**9,759,264**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain				***Fair value through other comprehensive income***
Rupiah				***Rupiah***
Reksadana	-	-	18,673,630	*Mutual funds*
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	1,150,731	*Issuing Bank Indonesia Rupiah Securities (SRBI)*
Obligasi subordinasi				*Subordinated bonds*
PT Bank Pan Indonesia Tbk	Pefindo	idAA - idA+	196,203	*PT Bank Pan Indonesia Tbk*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	74,707	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank UOB Indonesia	Fitch	AAA(idn)	67,226	*PT Bank UOB Indonesia*
Subtotal			338,136	*Subtotal*
Obligasi				*Bonds*
PT Sarana Multigriya Finansial (Persero)	Pefindo	idAAA	790,249	*PT Sarana Multigriya Finansial (Persero)*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	608,522	*PT Perusahaan Listrik Negara (Persero)*
PT Bank Mandiri (Persero)Tbk	Pefindo	idAAA	412,450	*PT Bank Mandiri (Persero) Tbk*
PT Hutama Karya (Persero)	Pefindo	idAA-	391,263	*PT Hutama Karya (Persero)*
PT Telkom Indonesia Tbk	Pefindo	idAAA	327,050	*PT Telkom Indonesia Tbk*
PT Semen Indonesia (Persero) Tbk	Pefindo	idAA+	251,933	*PT Semen Indonesia (Persero) Tbk*
PT Bank Maybank Indonesia Tbk	Pefindo	idAAA	236,198	*PT Bank Maybank Indonesia Tbk*
PT Bank Tabungan Negara (Persero) Tbk	Pefindo	idAAA	229,848	*PT Bank Tabungan Negara (Persero) Tbk*
PT Indosat Tbk	Pefindo	idAAA	222,130	*PT Indosat Tbk*
PT Chandra Asri Petrochemical Tbk	Pefindo	idAA-	221,625	*PT Chandra Asri Petrochemical Tbk*
PT Permodalan Nasional Madani	Pefindo	idAA+	200,567	*PT Permodalan Nasional Madani*
PT Adira Dinamika Multi Finance Tbk	Pefindo	idAAA	159,090	*PT Adira Dinamika Multi Finance Tbk*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	120,814	*PT Sarana Multi Infrastruktur (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	Pefindo	idAAA	119,290	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT XL Axiata Tbk	Fitch	AAA(idn)	108,530	*PT XL Axiata Tbk*
PT Mandiri Tunas Finance	Pefindo	idAAA	102,058	*PT Mandiri Tunas Finance*
PT Jasa Marga (Persero) Tbk	Pefindo	idAA	100,899	*PT Jasa Marga (Persero) Tbk*
PT Bank KB Bukopin Tbk	Pefindo	idAA	89,600	*PT Bank KB Bukopin Tbk*
PT Pegadaian	Pefindo	idAAA	89,200	*PT Pegadaian*
PT Pupuk Indonesia (Persero)	Fitch	AAA(idn)	76,002	*PT Pupuk Indonesia (Persero)*
PT Mora Telematika Indonesia Tbk	Pefindo	idA	58,140	*PT Mora Telematika Indonesia Tbk*
PT Adhi Karya (Persero) Tbk	Pefindo	idA-	50,574	*PT Adhi Karya (Persero) Tbk*
PT Bank Mandiri Taspen	Pefindo	idAAA	43,012	*PT Bank Mandiri Taspen*
PT Indonesia Infrastructure Finance	Pefindo	idAAA	14,819	*PT Indonesia Infrastructure Finance*
PT BRI Multifinance Indonesia	Pefindo	idAA	12,418	*PT BRI Multifinance Indonesia*
PT Bank CIMB Niaga Tbk	Pefindo	idAA	10,081	*PT Bank CIMB Niaga Tbk*

8. EFEK-EFEK (lanjutan) / ***8. MARKETABLE SECURITIES*** *(continued)*

d. Berdasarkan peringkat (lanjutan) / ***d. By rating*** *(continued)*

	2023			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Nilai wajar melalui penghasilan komprehensif lain (lanjutan)				***Fair value through other comprehensive income*** *(continued)*
Rupiah (lanjutan)				***Rupiah*** *(continued)*
Obligasi (lanjutan)				*Bonds (continued)*
PT Kereta Api Indonesia (Persero)	Pefindo	idAAA	9,943	*PT Kereta Api Indonesia (Persero)*
PT Bank Pembangunan Daerah Sulawesi Selatan dan Sulawesi Barat	Pefindo	idA+	4,750	*PT Bank Pembangunan Daerah Sulawesi Selatan dan Sulawesi Barat*
Lainnya	Beragam/*various*	Beragam/*various*	312,135	*Others*
Subtotal			5,373,190	*Subtotal*
			25,535,687	
Mata uang asing				***Foreign currencies***
Reksadana	-	-	780,243	*Mutual funds*
Obligasi				*Bonds*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	97,688	*PT Perusahaan Listrik Negara (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	Pefindo	idAAA	76,664	*PT Bank Rakyat Indonesia (Persero) Tbk*
Bank of America	Fitch	AA	75,970	*Bank of America*
Wells Fargo	Fitch	AA-	73,260	*Wells Fargo*
Suntrust Bank	Fitch	BBB	72,577	*Suntrust Bank*
JP Morgan Chase Bank, N.A.	Fitch	AA	69,517	*JPMorgan Chase Bank, N.A.*
M&T Bank Corporation	Fitch	A	68,357	*M&T Bank Corporation*
The Huntington National Bank	Fitch	A-	67,254	*The Huntington National Bank*
PT Pertamina (Persero)	Fitch	BBB	64,829	*PT Pertamina (Persero)*
PT Pelabuhan Indonesia (Persero)	Fitch	BBB	62,055	*PT Pelabuhan Indonesia (Persero)*
Subtotal			728,171	*Subtotal*
			1,508,414	
Total nilai wajar pada penghasilan komprehensif lain			**27,044,101**	***Total fair value through other comprehensive income***
Biaya perolehan diamortisasi				***Amortised cost***
Rupiah				***Rupiah***
Obligasi				*Bonds*
Intan Baruprana Finance	-	-	242,790	*Intan Baruprana Finance*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	200,000	*PT Sarana Multi Infrastruktur (Persero)*
PT Semen Indonesia (Persero) Tbk	Pefindo	idAA+	100,000	*PT Semen Indonesia (Persero) Tbk*
Subtotal			542,790	*Subtotal*
Mata uang asing				***Foreign currencies***
Obligasi				*Bonds*
PT Bank Mandiri (Persero)Tbk	Pefindo	idAAA	61,525	*PT Bank Mandiri (Persero) Tbk*
Subtotal			61,525	*Subtotal*
Total biaya perolehan diamortisasi			**604,315**	***Total amortised cost***
Total efek-efek			**37,407,680**	***Total marketable securities***
Cadangan kerugian penurunan nilai			(242,941)	*Allowance for impairment losses*
Efek-efek - bersih			**37,164,739**	***Marketable securities - net***

8. EFEK-EFEK (lanjutan)

e. Berdasarkan kolektibilitas sesuai Peraturan OJK

Kolektibilitas efek-efek sesuai Peraturan OJK diungkapkan pada Catatan 59d.

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

***8. MARKETABLE SECURITIES** (continued)*

e. By Financial Service Authority Rule collectibility

Collectibility marketable securities in accordance with Financial Service Authority Rule are disclosed in Note 59d.

f. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	361,524	-	242,791	604,315	*Beginning balance*
Pengukuran kembali bersih*)	2,815	-	-	2,815	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	22,951	-	-	22,951	*New financial assets originated or purchased*
Hapus Buku	-	-	(242,791)	(242,791)	*Write-offs*
	387,290	**-**	**-**	**387,290**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	28,211,090	310,453	-	28,521,543	*Beginning balance*
Pengukuran kembali bersih*)	(7,140,098)	963,271	-	(6,176,827)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,784,069	-	-	1,784,069	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	33,578	25,079	-	58,657	*Foreign exchange and other movements*
	22,888,639	**1,298,803**	**-**	**24,187,442**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan efek-efek

*Including in the net measurement is sales of marketable securities *)*

8. EFEK-EFEK (lanjutan)

***8. MARKETABLE SECURITIES** (continued)*

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

***f. Gross carrying amount and allowance for impairment losses** (continued)*

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

Movements in the gross carrying amount are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	476,012	-	246,493	722,505	*Beginning balance*
Aset keuangan baru yang diterbitkan atau dibeli	131,384	-	(7,404)	123,980	*New financial assets originated or purchased*
Pembayaran penuh	(245,872)	-	3,702	(242,170)	*Full repayment*
	361,524	**-**	**242,791**	**604,315**	

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	20,592,749	311,623	-	20,904,372	*Beginning balance*
Pengukuran kembali bersih*)	7,857,526	(9)	-	7,587,517	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	31,471	-	-	31,471	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	(656)	(1,161)	-	(1,817)	*Foreign exchange and other movements*
	28,211,090	**310,453**	**-**	**28,521,543**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan efek-efek

*Including in the net measurement is sales of marketable securities *)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

Movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	151	-	242,790	242,941	*Beginning balance*
Pengukuran kembali bersih*)	119	-	-	119	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	3	-	-	3	*New financial assets originated or purchased*
Hapus Buku	-	-	(242,790)	(242,790)	*Write-offs*
	273	**-**	**-**	**273**	

8. EFEK-EFEK (lanjutan)

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***8. MARKETABLE SECURITIES** (continued)*

***f. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the allowance for impairment losses are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total**)**	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	1,891	2,538	-	4,429	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian**)	699	(65)	-	634	*Net remeasurement of loss allowance**)*
Aset keuangan baru yang diterbitkan atau dibeli	544	-	-	544	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	30	198	-	228	*Foreign exchange and other movements*
	3,164	**2,671**	**-**	**5,835**	

*) Cadangan kerugian penurunan nilai pada efek-efek dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah penjualan efek-efek

*) *Allowance for impairment losses on marketable securities classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

**) *Including in the net measurement of loss allowance, is sales of marketable securities.*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	175	-	246,493	246,668	*Beginning balance*
Aset keuangan baru yang diterbitkan atau dibeli	151	-	-	151	*New financial assets originated or purchased*
Pembayaran penuh	(175)	-	(3,703)	(3,878)	*Full repayment*
	151	**-**	**242,790**	**242,941**	

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total**)**	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	2,852	3,258	-	6,110	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian**)	(756)	(709)	-	(1,465)	*Net remeasurement of loss allowance**)*
Aset keuangan baru yang diterbitkan atau dibeli	(203)	-	-	(203)	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	(2)	(11)	-	(13)	*Foreign exchange and other movements*
	1,891	**2,538**	**-**	**4,429**	

*) Cadangan kerugian penurunan nilai pada efek-efek dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah penjualan efek-efek

*) *Allowance for impairment losses on marketable securities classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

**) *Including in the net measurement of loss allowance, is sales of marketable securities.*

8. EFEK-EFEK (lanjutan)

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

***8. MARKETABLE SECURITIES** (continued)*

***f. Gross carrying amount and allowance for impairment losses** (continued)*

Management believes that the allowance for impairment losses stated above is adequate.

g. Tingkat suku bunga per tahun

g. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Suku Bunga:			*Interest Rate:*
2024	5.35 - 11.25	2.30 - 6.00	*2024*
2023	5.35 - 11.25	2.30 - 7.16	*2023*

9. WESEL EKSPOR DAN TAGIHAN LAINNYA

9. BILLS AND OTHER RECEIVABLES

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2024	2023	
Rupiah			***Rupiah***
Surat Keterangan Berdokumen Dalam Negeri (SKBDN)	3,018,683	3,688,683	*Domestic Documentary Letters of Credit*
Wesel Ekspor	245,084	182,530	*Export Bills*
Tagihan lainnya:			*Other receivables:*
- *Open account financing* dan *Supply chain financing*	6,687,195	8,832,690	*Open account financing and - Supply chain financing*
	9,950,962	12,703,903	
Mata uang asing			***Foreign currencies***
Wesel Ekspor	2,405,788	5,428,141	*Export Bills*
Surat Keterangan Berdokumen Dalam Negeri (SKBDN)	87,597	81,085	*Domestic Documentary Letters of Credit*
Tagihan lainnya:			*Other receivables:*
- *Open account financing* dan *Supply chain financing*	691,043	799,271	*Open account financing and - Supply chain financing*
- Tagihan transaksi *L/C Sight*	160,464	265,095	*L/C Sight receivables -*
	3,344,892	6,573,592	
Total	13,295,854	19,277,495	*Total*
Cadangan kerugian penurunan nilai	(52,828)	(278,501)	*Allowance for impairment losses*
	13,243,026	**18,998,994**	

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan) / *BILLS AND OTHER RECEIVABLES (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *By type and currency (continued)*

Perincian wesel ekspor dan tagihan lainnya berdasarkan mata uang adalah sebagai berikut:

Bills and other receivables based on currencies are as follows:

	2024	2023	
Rupiah	9,950,962	12,703,903	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	2,508,712	5,599,710	*United States Dollar*
Yuan China	835,837	973,882	*Chinese Yuan*
Euro Eropa	343	-	*European Euro*
	3,344,892	6,573,592	
Total	13,295,854	19,277,495	*Total*
Cadangan kerugian penurunan nilai	(52,828)	(278,501)	*Allowance for impairment losses*
	13,243,026	**18,998,994**	

b. Berdasarkan hubungan / *By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	6,121,139	10,004,155	*Rupiah*
Mata uang asing	87,597	81,085	*Foreign currencies*
Total pihak berelasi	6,208,736	10,085,240	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	3,829,823	2,699,748	*Rupiah*
Mata uang asing	3,257,295	6,492,507	*Foreign currencies*
Total pihak ketiga	7,087,118	9,192,255	*Total third parties*
Total	13,295,854	19,277,495	*Total*
Cadangan kerugian penurunan nilai	(52,828)	(278,501)	*Allowance for impairment losses*
	13,243,026	**18,998,994**	

c. Berdasarkan kolektibilitas sesuai Peraturan OJK / *By Financial Service Authority Rule collectibility*

Kolektibilitas wesel ekspor dan tagihan lainnya sesuai Peraturan OJK diungkapkan pada Catatan 59e.

Collectibility bills and other receivables in accordance with Financial Service Authority Rule are disclosed in Note 59e.

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

9. BILLS AND OTHER RECEIVABLES *(continued)*

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	17,006,310	2,271,185	-	19,277,495	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(317,559)	317,559	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	430,006	(430,006)	-	-	*Lifetime ECL not credit - -impaired*
Pengukuran kembali bersih*)	12,163,571	(74,679)	-	12,088,892	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,174,718	6,290	-	1,181,008	*New financial assets originated or purchased*
Pembayaran penuh	(17,513,406)	(2,017,860)	-	(19,531,266)	*Fully repayment*
Valuta asing dan perubahan lain	270,861	8,864	-	279,725	*Foreign exchange and other movements*
	13,214,501	**81,353**	**-**	**13,295,854**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

Including in the net remeasurement is repayment)*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	20,102,299	746,384	53,446	20,902,129	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(7,246,852)	7,246,852	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	3,360,633	(3,360,633)	-	-	*Lifetime ECL not credit - -impaired*
Pengukuran kembali bersih*)	15,597,649	(382,101)	-	15,215,548	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	4,973,517	-	-	4,973,517	*New financial assets originated or purchased*
Pembayaran penuh	(20,045,174)	(1,714,325)	-	(21,759,499)	*Fully repayment*
Hapus buku	-	-	(53,446)	(53,446)	*Write-offs*
Valuta asing dan perubahan lain	264,238	(264,992)	-	(754)	*Foreign exchange and other movements*
	17,006,310	**2,271,185**	**-**	**19,277,495**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

Including in the net remeasurement is repayment)*

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

9. BILLS AND OTHER RECEIVABLES *(continued)*

d. Gross carrying amount and allowance for impairment losses *(continued)*

Movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	87,124	191,377	-	278,501	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(419)	419	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	2,230	(2,230)	-	-	*Lifetime ECL not credit -impaired*
Pengukuran kembali bersih penyisihan kerugian	78,844	(165,188)	-	(86,344)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	3,314	63	-	3,377	*New financial assets originated or purchased*
Pembayaran penuh	(118,430)	(24,599)	-	(143,029)	*Fully repayment*
Valuta asing dan perubahan lain	(418)	741	-	323	*Foreign exchange and other movements*
	52,245	**583**	**-**	**52,828**	

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	108,650	10,813	53,446	172,909	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(16,990)	16,990	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	213,559	(213,559)	-	-	*Lifetime ECL not credit -impaired*
Pengukuran kembali bersih penyisihan kerugian	(118,791)	420,407	-	301,616	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	32,619	-	-	32,619	*New financial assets originated or purchased*
Pembayaran penuh	(132,823)	(42,702)	-	(175,525)	*Fully repayment*
Hapus buku	-	-	(53,446)	(53,446)	*Write-off*
Valuta asing dan perubahan lain	900	(572)	-	328	*Foreign exchange and other movements*
	87,124	**191,377**	**-**	**278,501**	

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai diatas telah memadai.

9. BILLS AND OTHER RECEIVABLES *(continued)*

d. Gross carrying amount and allowance for impairment losses *(continued)*

Management believes that the above allowance for impairment losses is adequate.

e. Tingkat suku bunga per tahun

e. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Bunga kontrak			*Contractual rates*
2024	0.00 - 8.00	0.00 - 6.00	*2024*
2023	0.00 - 11.25	0.00 - 8.41	*2023*

10. TAGIHAN AKSEPTASI

10. ACCEPTANCE RECEIVABLES

a. Berdasarkan pihak dan mata uang

a. By party and currency

	2024	2023	
Rupiah			***Rupiah***
Debitur non-bank	9,472,422	9,444,839	*Non-bank debtors*
Bank	107,089	158,993	*Banks*
	9,579,511	9,603,832	
Mata uang asing			***Foreign currencies***
Debitur non-bank	6,287,082	7,906,334	*Non-bank debtors*
Bank	152,177	58,509	*Banks*
	6,439,259	7,964,843	
Total	16,018,770	17,568,675	*Total*
Cadangan kerugian penurunan nilai	(93,249)	(477,481)	*Allowance for impairment losses*
	15,925,521	**17,091,194**	

Perincian tagihan akseptasi berdasarkan mata uang adalah sebagai berikut:

Acceptance receivables based on currencies are as follows:

	2024	2023	
Rupiah	9,579,511	9,603,832	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	5,982,789	7,789,126	*United States Dollar*
Yuan China	213,509	39,610	*Chinese Yuan*
Pound Sterling Inggris	173,852	41,205	*Great Britain Pound Sterling*
Yen Jepang	35,577	19,698	*Japanese Yen*
Euro Eropa	33,532	68,878	*European Euro*
Dolar Australia	-	1,729	*Australian Dollar*
Dolar Singapura	-	4,259	*Singapore Dollar*
Franc Swiss	-	338	*Swiss Franc*
	6,439,259	7,964,843	
Total	16,018,770	17,568,675	*Total*
Cadangan kerugian penurunan nilai	(93,249)	(477,481)	*Allowance for impairment losses*
	15,925,521	**17,091,194**	

10. TAGIHAN AKSEPTASI (lanjutan) / *10. ACCEPTANCE RECEIVABLES (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	2,046,948	2,949,903	*Rupiah*
Mata uang asing	778,312	209,052	*Foreign currencies*
Total pihak berelasi	2,825,260	3,158,955	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	7,532,563	6,653,929	*Rupiah*
Mata uang asing	5,660,947	7,755,791	*Foreign currencies*
Total pihak ketiga	13,193,510	14,409,720	*Total third parties*
Total	16,018,770	17,568,675	*Total*
Cadangan kerugian penurunan nilai	(93,249)	(477,481)	*Allowance for impairment losses*
	15,925,521	**17,091,194**	

c. Berdasarkan kolektibilitas sesuai Peraturan OJK / *c. By Financial Service Authority Rule collectibility*

Kolektibilitas tagihan akseptasi sesuai Peraturan OJK diungkapkan pada Catatan 59f.

Collectibility acceptance receivables in accordance with Financial Service Authority Rule are disclosed in Note 59f.

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai / *d. Gross carrying amount and allowance for impairment losses*

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	12,997,505	4,571,170	-	17,568,675	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(5,461,677)	5,461,677	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	9,678,270	(9,678,270)	-	-	*Lifetime ECL not credit impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	58,745	(58,745)	-	*Transfer from/to Lifetime ECL credit - - impaired - net*
Pengukuran kembali bersih*)	17,807,685	3,370,138	58,956	21,236,779	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,241,844	12,216	-	1,254,060	*New financial assets originated or purchased*
Pembayaran penuh	(22,630,027)	(1,711,097)	-	(24,341,124)	*Fully repayment*
Valuta asing dan perubahan lain	165,149	135,442	(211)	300,380	*Foreign exchange and other movements*
	13,798,749	**2,220,021**	**-**	**16,018,770**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

10. TAGIHAN AKSEPTASI (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

***10. ACCEPTANCE RECEIVABLES** (continued)*

***d. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the gross carrying amount are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	13,461,588	6,014,626	538,014	20,014,228	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(781,385)	781,385	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	529,257	(529,257)	-	-	*Lifetime ECL not credit impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(14,652)	14,652	-	*Transfer from/to Lifetime ECL credit - impaired - net*
Pengukuran kembali bersih*)	17,824,338	2,469,141	35,348	20,328,827	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,440,364	15,656	-	1,456,020	*New financial assets originated or purchased*
Pembayaran penuh	(19,449,990)	(4,174,991)	(576,434)	(24,201,415)	*Fully repayment*
Valuta asing dan perubahan lain	(26,667)	9,262	(11,580)	(28,985)	*Foreign exchange and other movements*
	12,997,505	**4,571,170**	**-**	**17,568,675**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali dan dampak akuisisi

Including in the net remeasurement is repayment and impact of acquisition)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	41,549	435,932	-	477,481	*Beginning balance*
Pengalihan dari:					*Transfer to:*
- Kerugian kredit ekspektasian 12 bulan	(9,619)	9,619	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	196,638	(196,638)	-	-	*Lifetime ECL not-credit impaired*
Pengalihan dari/ke Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	19,582	(19,582)	-	*Transfer from/to lifetime ECL credit-impaired*
Pengukuran kembali bersih penyisihan kerugian	(79,431)	41,658	19,658	(18,115)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	5,076	1,220	-	6,296	*New financial assets originated or purchased*
Pembayaran penuh	(108,201)	(270,462)	-	(378,663)	*Fully repayment*
Valuta asing dan perubahan lain	1,399	4,927	(76)	6,250	*Foreign exchange and other movements*
	47,411	**45,838**	**-**	**93,249**	

10. TAGIHAN AKSEPTASI (lanjutan)

***10. ACCEPTANCE RECEIVABLES** (continued)*

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

***d. Gross carrying amount and allowance for impairment losses** (continued)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

The movements in the allowance for impairment losses are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	37,193	566,623	498,569	1,102,385	*Beginning balance*
Pengalihan dari:					*Transfer to:*
- Kerugian kredit ekspektasian 12 bulan	(3,815)	3,815	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	15,155	(15,155)	-	-	*Lifetime ECL not-credit impaired*
Pengalihan dari/ke Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	(3,297)	3,297	-	*Transfer from/to lifetime ECL credit-impaired*
Pengukuran kembali bersih penyisihan kerugian	52,628	293,976	17,379	363,983	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	3,903	592	-	4,495	*New financial assets originated or purchased*
Pembayaran penuh	(63,201)	(406,827)	(507,665)	(977,693)	*Fully repayment*
Valuta asing dan perubahan lain	(314)	(3,795)	(11,580)	(15,689)	*Foreign exchange and other movements*
	41,549	**435,932**	**-**	**477,481**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai diatas telah memadai.

Management believes that the above allowance for impairment losses is adequate.

e. Tingkat suku bunga per tahun

e. Annual interest rates

	Dolar Amerika Serikat/*United States Dollar* %	
Suku Bunga :		*Interest Rate:*
2024	0.00 - 7.52	*2024*
2023	0.00 - 8.41	*2023*

11. TAGIHAN DAN LIABILITAS DERIVATIF / *11. DERIVATIVE RECEIVABLES AND PAYABLES*

Dalam melakukan usaha bisnis, BNI melakukan transaksi instrumen keuangan derivatif seperti kontrak berjangka mata uang asing, *swap* mata uang asing, *swap* atas suku bunga dan transaksi *spot* untuk keperluan pembiayaan, perdagangan dan lindung nilai.

In the normal course of business, BNI enters into transactions involving derivative financial instruments such as foreign currency forward contracts, currency swaps, interest rate swaps and spot transactions for financing, trading and hedging purposes.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

Instrumen	2024			*Instruments*
	Jumlah nosional mata uang asing (jumlah penuh)/ *Notional amount in foreign currency (full amount)*	Nilai wajar/*Fair values*		
		Tagihan derivatif/ *Derivative receivables*	Liabilitas derivatif/ *Derivative payables*	
Terkait Nilai Tukar				***Exchange Rate Related***
Kontrak berjangka - beli				*Forward contract - buy*
AUD	1,000,000	-	(727)	*AUD*
CNY	490,150,583	5,156	(4,938)	*CNY*
USD	619,063,138	145,043	(16,782)	*USD*
Kontrak berjangka - jual				*Forward contract - sell*
USD	709,039,849	35,034	(114,357)	USD
Swap mata uang asing - beli				*Foreign currency swaps - buy*
EUR	7,000,000	-	(1,565)	*EUR*
GBP	2,500,000	-	(828)	*GBP*
JPY	35,963,593,684	5,170	(74,125)	*JPY*
SGD	43,000,000	-	(1,599)	*SGD*
USD	1,720,986,416	423,786	(55,650)	*USD*
Swap mata uang asing - jual				*Foreign currency swaps - sell*
AUD	200,000	68	-	*AUD*
EUR	118,766,365	43,757	(1,458)	*EUR*
GBP	20,500,000	5,724	(401)	*GBP*
NZD	7,000,000	117	-	*NZD*
SGD	57,890,550	1,953	(6,592)	*SGD*
USD	1,454,456,761	41,171	(256,972)	*USD*
Spot mata uang asing - beli				*Foreign currency spots - buy*
AUD	461,560	3	(5)	*AUD*
EUR	6,550,000	16	(117)	*EUR*
GBP	2,100,000	-	(47)	*GBP*
USD	233,043,126	218	(13,280)	*USD*
Spot mata uang asing - jual				*Foreign currency spots - sell*
AUD	8,000,000	41	(160)	*AUD*
CNY	90,000,000	1,484	-	*CNY*
EUR	1,402,632	5	(7)	*EUR*
GBP	97,000	1	-	*GBP*
USD	361,110,000	12,705	(394)	*USD*
OTC Option - beli				*OTC Option - buy*
USD	2,490,000,000	362,558	(73,145)	*USD*
OTC Option - jual				*OTC Option - sell*
USD	2,490,000,000	106,802	(362,141)	*USD*
Terkait Nilai Tukar dan Suku Bunga				***Exchange and Interest Rate Related***
Swap atas suku bunga				*Interest rate swap*
USD	530,138,055	167,815	(139,124)	*USD*
Swap mata uang asing dan suku bunga				*Cross currency swaps and interest rate*
USD	758,826,078	340,969	(243,174)	*USD*
Risk Free Rate				*Risk Free Rate*
IDR	1,000,000,000,000	22,306	(16,153)	*IDR*
USD	672,791,977	71,076	(95,444)	*USD*
		1,792,978	**(1,479,185)**	

11. TAGIHAN DAN LIABILITAS DERIVATIF (lanjutan) / *11. DERIVATIVE RECEIVABLES AND PAYABLES (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

Instrumen / *Instruments*	2023		
	Jumlah nosional mata uang asing (jumlah penuh)/ *Notional amount in foreign currency (full amount)*	Nilai wajar/*Fair values*	
		Tagihan derivatif/ *Derivative receivables*	Liabilitas derivatif/ *Derivative payables*
Terkait Nilai Tukar / ***Exchange Rate Related***			
Kontrak berjangka - beli / *Forward contract - buy*			
CNY / *CNY*	416,972,397	7,084	-
USD / *USD*	543,853,761	3,039	(78,127)
Kontrak berjangka - jual / *Forward contract - sell*			
CNY / *CNY*	102,000,000	19	-
EUR / *EUR*	4,000,000	-	(988)
USD	246,529,197	38,242	(7,255)
Swap mata uang asing - beli / *Foreign currency swaps - buy*			
EUR / *EUR*	46,764	18	-
JPY / *JPY*	27,529,802,340	72,213	(929)
SGD / *SGD*	15,000,000	969	-
USD / *USD*	968,073,582	11,349	(198,979)
Swap mata uang asing - jual / *Foreign currency swaps - sell*			
AUD / *AUD*	11,000,000	270	(50)
EUR / *EUR*	85,959,000	1,228	(16,180)
GBP / *GBP*	15,000,000	294	(1,447)
SGD / *SGD*	88,844,400	8,123	(238)
USD / *USD*	1,328,878,993	300,017	(6,393)
Spot mata uang asing - beli / *Foreign currency spots - buy*			
AUD / *AUD*	40,800,000	-	(825)
EUR / *EUR*	16,500,000	-	(783)
GBP / *GBP*	3,250,000	-	(281)
USD / *USD*	198,539,729	956	(4,759)
Spot mata uang asing - jual / *Foreign currency spots - sell*			
AUD / *AUD*	35,064,185	482	(40)
EUR / *EUR*	9,900,000	337	-
USD / *USD*	197,070,000	3,871	(834)
Terkait Nilai Tukar dan Suku Bunga / ***Exchange and Interest Rate Related***			
Swap atas suku bunga / *Interest rate swap*			
USD / *USD*	530,138,055	356,400	(321,987)
Swap mata uang asing dan suku bunga / *Cross currency swaps and interest rate*			
USD / *USD*	776,376,200	157,150	(109,419)
Risk Free Rate / *Risk Free Rate*			
IDR / *IDR*	1,000,000,000,000	11,408	(4,080)
USD / *USD*	350,398,400	22,208	(56,868)
		995,677	**(810,462)**

b. Berdasarkan hubungan / *b. By relationship*

	2024	2023	
Tagihan derivatif			***Derivatives receivables***
Pihak berelasi			***Related parties***
Mata uang asing	341,832	37,939	*Foreign currencies*
Total pihak berelasi	341,832	37,939	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	22,306	11,407	*Rupiah*
Mata uang asing	1,428,840	946,331	*Foreign currencies*
Total pihak ketiga	1,451,146	957,738	*Total third parties*
Total	**1,792,978**	**995,677**	***Total***

11. TAGIHAN DAN LIABILITAS DERIVATIF (lanjutan)

11. DERIVATIVE RECEIVABLES AND PAYABLES (continued)

b. Berdasarkan hubungan (lanjutan)

***b. By relationship** (continued)*

	2024	2023	
Liabilitas derivatif			***Derivatives payables***
Pihak berelasi			***Related parties***
Mata uang asing	(154,840)	(136,138)	*Foreign currencies*
Total pihak berelasi	(154,840)	(136,138)	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	(16,153)	(4,080)	*Rupiah*
Mata uang asing	(1,308,192)	(670,244)	*Foreign currencies*
Total pihak ketiga	(1,324,345)	(674,324)	*Total third parties*
Total	**(1,479,185)**	**(810,462)**	***Total***

Kolektibilitas tagihan derivatif sesuai Peraturan OJK diungkapkan pada Catatan 59g.

Derivative receivable in accordance with Financial Service Authority Rule are disclosed in Note 59g.

12. PINJAMAN YANG DIBERIKAN

12. LOANS

Informasi mengenai pinjaman yang diberikan kepada pihak-pihak berelasi diungkapkan pada Catatan 45i.

Information related to loans to related parties are disclosed in Note 45i.

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2024	2023	
Rupiah			***Rupiah***
Modal kerja	313,931,090	287,568,933	*Working capital*
Konsumen	144,437,589	123,294,534	*Consumer*
Investasi	98,811,980	92,160,057	*Investment*
Sindikasi	51,506,578	55,902,345	*Syndicated*
Karyawan	2,893,682	3,633,329	*Employee*
Program pemerintah	2,652	31,380	*Government programs*
	611,583,571	562,590,578	
Mata uang asing			***Foreign currencies***
Modal kerja	85,839,485	65,317,028	*Working capital*
Sindikasi	45,614,532	41,697,818	*Syndicated*
Investasi	32,810,919	25,455,452	*Investment*
Konsumen	22,682	22,480	*Consumer*
Karyawan	589	1,413	*Employee*
	164,288,207	132,494,191	
Total	775,871,778	695,084,769	*Total*
Cadangan kerugian penurunan nilai	(38,684,520)	(47,158,131)	*Allowance for impairment losses*
	737,187,258	**647,926,638**	

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *LOANS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *By type and currency (continued)*

Perincian pinjaman yang diberikan berdasarkan mata uang adalah sebagai berikut:

Loans based on currencies are as follows:

	2024	2023	
Rupiah	611,583,571	562,590,578	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	158,597,057	129,252,588	*United States Dollar*
Euro Eropa	2,198,860	580,870	*European Euro*
Yen Jepang	1,184,519	985,505	*Japanese Yen*
Dolar Singapura	1,041,007	1,057,784	*Singapore Dollar*
Dolar Australia	791,438	-	*Australian Dollar*
Won Korea Selatan	327,873	362,538	*South Korean Won*
Dolar Hong Kong	120,419	229,647	*Hong Kong Dollar*
Yuan China	14,493	16,794	*Chinese Yuan*
Pound Sterling Inggris	12,541	8,465	*Great Britain Pound Sterling*
	164,288,207	132,494,191	
Total	775,871,778	695,084,769	*Total*
Cadangan kerugian penurunan nilai	(38,684,520)	(47,158,131)	*Allowance for impairment losses*
	737,187,258	**647,926,638**	

b. Berdasarkan hubungan / *By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Modal kerja	75,643,457	65,634,971	*Working capital*
Sindikasi	30,425,373	33,020,748	*Syndicated*
Investasi	11,427,719	7,524,152	*Investment*
Karyawan	190,526	156,873	*Employee*
Konsumen	68,632	77,226	*Consumer*
	117,755,707	106,413,970	
Mata uang asing			***Foreign currencies***
Modal kerja	28,408,879	15,286,941	*Working capital*
Investasi	9,367,350	143,829	*Investment*
Sindikasi	3,870,753	4,514,580	*Syndicated*
	41,646,982	19,945,350	
Total pihak berelasi	159,402,689	126,359,320	*Total related parties*

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *12. LOANS (continued)*

b. Berdasarkan hubungan (lanjutan) / *b. By relationship (continued)*

	2024	2023	
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Modal kerja	238,287,633	221,933,962	*Working capital*
Konsumen	144,368,957	123,217,308	*Consumer*
Investasi	87,384,261	84,635,905	*Investment*
Sindikasi	21,081,205	22,881,597	*Syndicated*
Karyawan	2,703,156	3,476,456	*Employee*
Program pemerintah	2,652	31,380	*Government programs*
	493,827,864	456,176,608	
Mata uang asing			***Foreign currencies***
Modal kerja	57,430,606	50,030,087	*Working capital*
Sindikasi	41,743,779	37,183,238	*Syndicated*
Investasi	23,443,569	25,311,623	*Investment*
Konsumen	22,682	22,480	*Consumer*
Karyawan	589	1,413	*Employee*
	122,641,225	112,548,841	
Total pihak ketiga	616,469,089	568,725,449	*Total third parties*
Total	775,871,778	695,084,769	*Total*
Cadangan kerugian penurunan nilai	(38,684,520)	(47,158,131)	*Allowance for impairment losses*
	737,187,258	**647,926,638**	

c. Berdasarkan sektor ekonomi / *c. By economic sector*

	2024	2023	
Rupiah			***Rupiah***
Perdagangan, restoran dan hotel	117,511,041	121,206,489	*Trading, restaurants and hotels*
Perindustrian	93,334,411	81,766,078	*Manufacturing*
Konstruksi	59,281,490	54,008,973	*Construction*
Pertanian	46,121,348	53,853,092	*Agriculture*
Jasa dunia usaha	48,625,301	42,996,948	*Business services*
Pengangkutan, pergudangan dan komunikasi	45,678,272	36,666,225	*Transportation, warehousing and communications*
Pertambangan	22,417,498	18,543,179	*Mining*
Jasa pelayanan sosial	17,902,796	11,769,861	*Social services*
Listrik, gas dan air	13,377,490	10,031,119	*Electricity, gas and water*
Lain-lain	147,333,924	131,748,614	*Others*
	611,583,571	562,590,578	

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *12. LOANS (continued)*

c. Berdasarkan sektor ekonomi (lanjutan) / *c. By economic sector (continued)*

	2024	2023	
Mata uang asing			***Foreign currencies***
Perindustrian	66,246,233	55,895,697	*Manufacturing*
Pertambangan	29,242,696	30,399,528	*Mining*
Jasa pelayanan sosial	22,837,062	2,660,966	*Social services*
Listrik, gas dan air	18,265,799	11,509,631	*Electricity, gas and water*
Pengangkutan, pergudangan dan komunikasi	12,146,246	12,605,182	*Transportation, warehousing and communications*
Perdagangan, restoran dan hotel	7,900,500	9,220,949	*Trading, restaurants and hotels*
Jasa dunia usaha	3,697,706	4,191,627	*Business services*
Pertanian	2,768,670	2,585,254	*Agriculture*
Konstruksi	1,160,025	435,206	*Construction*
Lain-lain	23,270	2,990,151	*Others*
	164,288,207	132,494,191	
Total	775,871,778	695,084,769	*Total*
Cadangan kerugian penurunan nilai	(38,684,520)	(47,158,131)	*Allowance for impairment losses*
	737,187,258	**647,926,638**	

d. Berdasarkan penilaian secara kolektif dan individual / *d. By assessment as collective and individual*

	2024	2023	
Pokok			***Principal***
Individual	46,827,462	77,708,689	*Individual*
Kolektif	729,044,316	617,376,080	*Collective*
	775,871,778	695,084,769	
Cadangan kerugian penurunan nilai			***Allowance for impairment losses***
Individual	(1,873,107)	(36,820,861)	*Individual*
Kolektif	(36,811,413)	(10,337,270)	*Collective*
	(38,684,520)	(47,158,131)	
	737,187,258	**647,926,638**	

e. Berdasarkan kolektibilitas sesuai Peraturan OJK / *e. By Financial Service Authority Rule collectibility*

Kolektabilitas pinjaman sesuai dengan peraturan OJK diungkapkan pada Catatan 59h.

Collectibility loans in accordance with the OJK regulation are disclosed in Note 59h.

f. Pinjaman bermasalah dan cadangan kerugian penurunan nilai berdasarkan sektor ekonomi / *f. Non-performing loans and allowance for impairment losses by economic sector*

Rasio kredit bermasalah BNI dan Entitas Anak sesuai dengan peraturan OJK diungkapkan pada Catatan 59h.

The non-performing loans ratio of BNI and Subsidiaries in accordance with the OJK regulation are disclosed in Note 59h.

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *12. LOANS (continued)*

g. Tingkat suku bunga per tahun / *g. Annual interest rates*

	Rupiah*) %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	Dolar Australia/ *Australian Dollar* %	
Bunga kontrak											*Contractual rates*
2024	0.00 - 22.45	0.00 - 10.22	3.90 - 7.00	0.41 - 3.88	4.00 - 7.25	4.35 - 6.00	6.25	7.60 - 7.70	1.50 - 8.56	6.71 – 7.00	*2024*
2023	0.00 - 26.62	0.00 - 11.18	4.00 - 7.20	0.50 - 3.51	4.00 - 7.25	4.00 - 5.47	6.00 - 6.00	7.00 - 8.30	0.85 - 9.53	-	*2023*
Bunga efektif											*Effective interest rate*
2024	0.00 - 29.90	0.10 - 10.22	3.90 - 7.00	0.41 - 3.88	4.00 - 7.36	4.35 - 6.00	6.25	7.60 - 7.00	1.50 - 8.56	6.71 – 7.00	*2024*
2023	0.00 - 27.00	0.10 - 11.18	4.00 - 7.20	0.50 - 4.37	4.00 - 7.36	4.00 - 5.47	6.00 - 6.00	7.00 - 8.30	0.85 - 9.53	-	*2023*

*) Tidak termasuk dalam tingkat suku bunga kontrak dan suku bunga efektif diatas adalah suku bunga dari transaksi *Paylater* untuk tanggal 31 Desember 2024 dan 2023 masing-masing sebesar 18,96% - 51,48% dan 17,98% - 51,48%.

*) *Not included in the contractual interest rates and effective interest rate above are the interest rate from Paylater transactions as of 31 December 2024 and 2023, were 18.96% - 51.48% and 17.98% - 51.48%, respectively.*

h. Pinjaman yang direstrukturisasi / *h. Restructured loans*

Berikut ini adalah jenis dan jumlah kredit yang telah direstrukturisasi per 31 Desember 2024 dan 2023:

Below are the types and amounts of restructured loans as of 31 December 2024 and 2023:

	2024	2023	
Penurunan suku bunga kredit	25,710,415	23,729,178	*Reduction of interest rates*
Perpanjangan jangka waktu	24,753,697	25,939,841	*Extension of loan maturity dates*
Lainnya*)	16,294,208	26,121,994	*Others*)*
	66,758,320	**75,791,013**	

*) Program restrukturisasi lain-lain terutama terdiri dari penambahan fasilitas kredit, Perjanjian Penyelesaian Hutang (PPH) dan *Interest Balloon Payments (IBP)*.

*) *Other restructuring schemes mainly includes additions of loan facilities, debt settlement agreements (PPH) and Interest Balloon Payments (IBP).*

Pinjaman yang direstrukturisasi sesuai dengan peraturan OJK diungkapkan pada Catatan 59h.

Restructured loans in accordance with the OJK regulation are disclosed in Note 59h.

BNI telah melakukan restrukturisasi kredit untuk debitur yang terdampak pandemi Covid-19 sesuai dengan Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2021 (POJK 17/2021) tentang Perubahan Kedua Atas Peraturan Otoritas Jasa Keuangan Nomor 11/POJK.03/2020 Tentang Stimulus Perekonomian Nasional Sebagai Kebijakan Countercyclical Dampak Penyebaran Coronavirus Disease 2019, dimana peraturan tersebut diperpanjang sampai dengan 31 Maret 2024 melalui Siaran Pers OJK No. SP 85/DHMS/OJK/XI/2022 tanggal 28 November 2022 tentang Perpanjangan Kebijakan Restrukturisasi Kredit dan Pembiayaan secara Targeted dan Sektoral Atasi Dampak Lanjutan Pandemi Covid-19.

BNI has undertaken credit restructuring for debtors affected by the Covid-19 pandemic in accordance with Financial Services Authority Regulation No. 17/POJK.03/2021 (POJK 17/2021) on the Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2020 Concerning National Economic Stimulus as a Countercyclical Policy Impacting the Spread of Covid-19. This regulation has been extended until 31 March 2024, as communicated in the Financial Services Authority Press Release No. SP 85/DHMS/OJK/XI/2022 dated 28 November 2022, regarding the Extension of Credit Restructuring Policies in a Targeted and Sectoral to address ongoing impacts of the Covid-19 pandemic.

12. PINJAMAN YANG DIBERIKAN (lanjutan)

i. Pinjaman sindikasi

Pinjaman sindikasi merupakan pinjaman yang diberikan kepada debitur berdasarkan perjanjian pembiayaan bersama dengan bank-bank lain.

Keikutsertaan Grup dalam pinjaman sindikasi dengan bank-bank lain adalah sebesar Rp97.121.110 dan Rp97.600.163 masing-masing pada tanggal 31 Desember 2024 dan 2023.

Persentase bagian BNI dalam pinjaman sindikasi, dimana BNI bertindak sebagai pimpinan sindikasi adalah sebagai berikut:

	2024	2023	
% Partisipasi	5.04% - 100.00%	5.04% - 100.00%	*% Participation*

Keikutsertaan BNI dalam pinjaman sindikasi, dimana BNI bertindak sebagai anggota sindikasi adalah sebagai berikut:

	2024	2023	
% Partisipasi	0.13% - 50.00%	0.13% - 50.00%	*% Participation*

***12. LOANS** (continued)*

i. Syndicated loans

Syndicated loans represent loans provided to debtors based on syndication agreements with other banks.

Group participation in syndicated loans with other banks amounted to Rp97,121,110 and Rp97,600,163 as of 31 December 2024 and 2023, respectively.

BNI's percentage shares in syndicated loans, in which BNI acts as the lead arranger, is as follows:

BNI's participation in syndicated loans, in which BNI acts as the syndication member, is as follows:

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

j. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Pinjaman yang diberikan					***Loans***
Saldo awal	592,250,284	71,267,952	31,566,533	695,084,769	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(46,089,808)	46,089,808	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian Sepanjang umurnya - kredit tidak memburuk	44,881,133	(44,881,133)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	(314,609)	(15,033,813)	15,348,422	-	*Transfer from/to lifetime ECL credit impaired - net*
Pengukuran kembali bersih*)	(111,065,027)	(16,255,626)	(2,016,400)	(129,337,053)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	391,171,138	22,311,172	273,118	413,755,428	*New financial assets originated or purchased*
Pembayaran penuh	(184,273,357)	(5,396,143)	(661,663)	(190,331,163)	*Fully repayment*
Penghapusbukuan	(2,939)	(109,376)	(18,611,521)	(18,723,836)	*Write-offs*
Valuta asing dan perubahan lain	4,153,490	1,222,187	47,956	5,423,633	*Foreign exchange and other movements*
	690,710,305	**59,215,028**	**25,946,445**	**775,871,778**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

12. PINJAMAN YANG DIBERIKAN (lanjutan)

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

***12. LOANS** (continued)*

***j. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the gross carrying amount are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Pinjaman yang diberikan					***Loans***
Saldo awal	548,586,079	64,916,819	32,685,415	646,188,313	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(50,507,361)	50,507,361	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian Sepanjang umurnya - kredit tidak memburuk	27,382,099	(27,382,099)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	(379,605)	(14,142,760)	14,522,365	-	*Transfer from/to lifetime ECL credit impaired - net*
Pengukuran kembali bersih*)	(84,580,425)	(29,367,056)	(3,536,324)	(117,483,805)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	307,227,911	30,794,438	4,363,091	342,385,440	*New financial assets originated or purchased*
Pembayaran penuh	(154,760,114)	(4,339,928)	(1,831,940)	(160,931,982)	*Fully repayment*
Penghapusbukuan	(8,904)	(108,015)	(14,273,418)	(14,390,337)	*Write-offs*
Valuta asing dan perubahan lain	(709,396)	389,192	(362,656)	(682,860)	*Foreign exchange and other movements*
	592,250,284	**71,267,952**	**31,566,533**	**695,084,769**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Pinjaman yang diberikan					***Loans***
Saldo awal	4,116,856	19,078,523	23,962,752	47,158,131	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,388,026)	1,388,026	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	2,776,280	(2,776,280)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	308,386	(5,022,780)	4,714,394	-	*Transfer from/to: Lifetime ECL credit-impaired -*
Pengukuran kembali bersih penyisihan kerugian*)	(1,792,074)	(2,015,723)	7,990,276	4,182,479	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,651,317	7,921,581	118,669	9,691,567	*New financial assets originated or purchased*
Pembayaran penuh	(1,554,149)	(1,955,047)	(616,441)	(4,125,637)	*Fully repayment*
Penghapusbukuan	(2,939)	(109,376)	(18,611,521)	(18,723,836)	*Write-offs*
Valuta asing dan perubahan lain	15,520	215,974	270,322	501,816	*Foreign exchange and other movements*
	4,131,171	**16,724,898**	**17,828,451**	**38,684,520**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian, adalah pembayaran kembali.

*Including in the net remeasurement of loss allowance is repayment *)*

12. PINJAMAN YANG DIBERIKAN (lanjutan)

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***12. LOANS** (continued)*

***j. Gross carrying amount and allowance for impairment losses** (continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Pinjaman yang diberikan					***Loans***
Saldo awal	4,126,973	19,560,944	26,646,071	50,333,988	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,521,043)	1,521,043	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	3,096,988	(3,096,988)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	589,319	(5,046,193)	4,456,874	-	*Transfer from/to: Lifetime ECL credit-impaired -*
Pengukuran kembali bersih penyisihan kerugian*)	(2,551,411)	2,233,912	6,524,986	6,207,487	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,455,725	5,529,000	2,494,908	9,479,633	*New financial assets originated or purchased*
Pembayaran penuh	(1,062,757)	(1,605,474)	(1,672,425)	(4,340,656)	*Fully repayment*
Penghapusbukuan	(8,904)	(108,015)	(14,273,418)	(14,390,337)	*Write-offs*
Valuta asing dan perubahan lain	(8,034)	90,294	(214,244)	(131,984)	*Foreign exchange and other movements*
	4,116,856	**19,078,523**	**23,962,752**	**47,158,131**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian, adalah pembayaran kembali.

*Including in the net remeasurement of loss allowance is repayment *)*

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses above is adequate.

k. Kredit dihapusbukukan

Kredit yang telah dihapusbukukan oleh BNI dicatat sebagai kredit ekstra-komtabel di dalam rekening administratif.

k. Loans written off

The loans written off by BNI are recorded as extra-comptable in the administrative account.

l. Fasilitas pembiayaan dengan perusahaan pembiayaan

BNI memiliki perjanjian pembiayaan dengan beberapa lembaga pembiayaan untuk membiayai kepemilikan kendaraan bermotor sebesar Rp2.729.935 dan Rp2.798.494 masing-masing pada tanggal 31 Desember 2024 dan 2023.

l. Financing arrangements with multi-finance companies

BNI has financing arrangements with several multi-finance companies with respect to motor vehicles financing amounting to Rp2,729,935 and Rp2,798,494 as of 31 December 2024 and 2023, respectively.

12. PINJAMAN YANG DIBERIKAN (lanjutan)

m. Informasi pokok lainnya sehubungan dengan pinjaman yang diberikan

Grup memiliki agunan atas pinjaman yang diberikan dalam bentuk kas, deposito, agunan yang diikat dengan hipotik, garansi serta jaminan dalam bentuk aset lainnya.

Pinjaman karyawan adalah pinjaman yang diberikan kepada karyawan dengan tingkat bunga sebesar 3% - 5% per tahun yang ditujukan untuk pembelian rumah dan keperluan lainnya dengan jangka waktu berkisar antara 1 tahun sampai 20 tahun. Pembayaran pokok pinjaman dan bunga dilunasi melalui pemotongan gaji setiap bulan.

Informasi pokok lainnya terkait pelampauan Batas Maksimum Pemberian Kredit Bank sesuai dengan peraturan yang ditetapkan OJK diungkapkan pada Catatan 59h.

***12. LOANS** (continued)*

m. Other significant information relating to loans

The Group holds collateral against loans in the form of cash, deposits, registered mortgages, guarantees and other assets held as collaterals.

Loans to employees which carried interest rate of 3% - 5% per annum are intended for purchase of houses and other necessities with 1 year to 20 years period. The loan principal and interest payments are settled through monthly payroll deductions.

Other significant information such as any breach nor violation of Legal Lending Limit as required by Regulation of Financial Services Authority are disclosed in Note 59h.

13. OBLIGASI PEMERINTAH

Informasi mengenai Obligasi Pemerintah berdasarkan pihak yang berelasi diungkapkan pada Catatan 45e.

13. GOVERNMENT BONDS

Information related to Government Bonds to related parties are disclosed in Note 45e.

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2024		2023		
	Nilai Nominal/ *Nominal Value*	**Nilai Tercatat/ *Carrying Value***	**Nilai Nominal/ *Nominal Value***	**Nilai Tercatat/ *Carrying Value***	
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Rupiah					***Rupiah***
Tingkat bunga tetap	3,844,241	3,858,064	3,917,793	4,013,012	*Fixed rate*
Mata uang asing					***Foreign currencies***
Tingkat bunga tetap	109,687	99,009	176,681	174,760	*Fixed rate*
Total nilai wajar melalui laba rugi	**3,953,928**	**3,957,073**	**4,094,474**	**4,187,772**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Rupiah					***Rupiah***
Tingkat bunga tetap	71,468,504	71,351,417	66,611,736	67,784,249	*Fixed rate*
Tingkat bunga mengambang	100,000	99,959	100,000	99,957	*Floating rate*
	71,568,504	71,451,376	66,711,736	67,884,206	
Mata uang asing					***Foreign currencies***
Tingkat bunga tetap	20,600,172	19,453,065	19,643,203	18,665,126	*Fixed rate*
Total nilai wajar melalui penghasilan komprehensif lain	**92,168,676**	**90,904,441**	**86,354,939**	**86,549,332**	***Total fair value through other comprehensive income***

13. OBLIGASI PEMERINTAH (lanjutan) / *13. GOVERNMENT BONDS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

	2024		2023		
	Nilai Nominal/ *Nominal Value*	Nilai Tercatat/ *Carrying Value*	Nilai Nominal/ *Nominal Value*	Nilai Tercatat/ *Carrying Value*	
Biaya perolehan diamortisasi					***Amortised cost***
Rupiah					***Rupiah***
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi, sebesar Rp178.662 per 31 Desember 2024 dan Rp2.150.144 per 31 Desember 2023	23,749,156	23,927,818	21,255,598	23,405,742	*Fixed rate, net of unamortised discount/premium of Rp178,662 as of 31 December 2024 and Rp2,150,144 as of 31 December 2023*
Mata uang asing					***Foreign currencies***
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi sebesar Rp46.836 per 31 Desember 2024 dan Rp81.819 per 31 Desember 2023	13,235,401	13,282,237	12,875,704	12,957,523	*Fixed rate, net of unamortised discount/ premium of Rp46,836 as of 31 December 2024 and Rp81,819 as of 31 December 2023*
Total biaya perolehan diamortisasi	**36,984,557**	**37,210,055**	**34,131,302**	**36,363,265**	***Total amortised cost***
Total Obligasi Pemerintah		**132,071,569**		**127,100,369**	***Total Government Bonds***
Cadangan kerugian penurunan nilai		(2,988)		(1,504)	*Allowance for impairment losses*
Obligasi Pemerintah - bersih		**132,068,581**		**127,098,865**	***Government Bonds – net***

Jumlah nominal Obligasi Pemerintah yang diterima BNI dari program rekapitalisasi masing-masing sebesar Rp100.000 pada tanggal 31 Desember 2024 dan 2023.

The total outstanding nominal amount of Government Bonds received by BNI from the recapitalization program amounted to Rp100,000 as of 31 December 2024 and 2023, respectively.

Jumlah Obligasi Pemerintah yang dikelompokkan sebagai nilai wajar melalui penghasilan komprehensif lain yang dijual selama tahun berjalan adalah sebagai berikut:

The total Government Bonds at fair value through other comprehensive income sold during the current year are as follows:

	Total dijual/ *Sold*	Kepada pihak ketiga/ *To third parties*		
	Nilai nominal/ *Nominal value*	Nilai nominal/ *Nominal value*	Harga jual/ *Selling price*	
2024	7,115,934	4,758,601	4,776,476	*2024*
2023	12,601,328	7,818,999	8,111,514	*2023*

Jumlah nilai nominal Obligasi Pemerintah yang telah jatuh tempo pada 31 Desember 2024 dan 2023 masing-masing adalah sebesar Rp14.123.726 dan Rp10.467.207.

Total nominal amount of Government Bonds which have matured amounted to Rp14,123,726 and Rp10,467,207 as of 31 December 2024 and 2023, respectively.

Untuk tingkat bunga tetap, harga pasar Obligasi Pemerintah berkisar antara 54,49% sampai dengan 129,31% dan antara 73,91% sampai dengan 132,33% masing-masing pada tanggal 31 Desember 2024 dan 2023.

For fixed interest rate bonds, the market price of Government Bonds ranged from 54.49% to 129.31% and from 73.91% to 132.33% as of 31 December 2024 and 2023, respectively.

Untuk obligasi tingkat bunga mengambang, harga pasar Obligasi Pemerintah adalah 99,96% pada tanggal 31 Desember 2024 dan 99,96% pada tanggal 31 Desember 2023 dari nilai nominal.

For floating interest rate bonds, the market price of Government Bonds is 99.96% as of 31 December 2024 and 99.96% as of 31 December 2023 of the nominal amounts.

13. OBLIGASI PEMERINTAH (lanjutan) / *13. GOVERNMENT BONDS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

BNI mengakui adanya keuntungan atau kerugian yang belum direalisasi atas perubahan nilai pasar Obligasi Pemerintah dalam kelompok nilai wajar melalui penghasilan komprehensif lain (bersih setelah pajak) sebesar Rp715.380 (laba) dan Rp742.928 (laba) masing-masing untuk periode/tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023 yang dicatat pada bagian ekuitas laporan posisi keuangan konsolidasian.

BNI recognised the unrealised gains or losses from the changes in the market value of the Government Bonds categorised as fair value through other comprehensive income (net of taxes) in the amount of Rp715,380 (gain) and Rp742,928 (gain) for the period/year ended 31 December 2024 and 2023, respectively, both recorded in the equity section of the consolidated statement of financial position.

Pada 31 Desember 2024 dan 2023, Obligasi Pemerintah dengan tingkat bunga tetap dengan jumlah nominal Rp16.769.460 dan Rp7.691.569 telah dijual dengan janji dibeli kembali hingga jatuh tempo (lihat Catatan 24).

As of 31 December 2024 and 2023, the fixed rate government bonds have been sold under agreements to repurchase at maturity with nominal amount of Rp16,769,460 and Rp7,691,569, respectively (refer to Note 24).

b. Berdasarkan kisaran tanggal jatuh tempo dan jenis bunga / *b. Based on maturity date and type of interest rate*

	2024	
Nilai wajar melalui laba rugi		*Fair value through profit of loss*
Obligasi tingkat bunga tetap	03/01/2025 - 12/03/2071	*Fixed rate bonds*
Nilai wajar melalui penghasilan komprehensif lain		*Fair value through other comprehensive income*
Obligasi tingkat bunga tetap	10/01/2025 - 15/07/2064	*Fixed rate bonds*
Obligasi tingkat bunga mengambang	25/04/2025	*Floating rate bonds*
Biaya perolehan diamortisasi		*Amortised cost*
Obligasi tingkat bunga tetap	10/01/2025 - 15/07/2054	*Fixed rate bonds*

	2023	
Nilai wajar melalui laba rugi		*Fair value through profit of loss*
Obligasi tingkat bunga tetap	04/01/2024 - 12/03/2071	*Fixed rate bonds*
Nilai wajar melalui penghasilan komprehensif lain		*Fair value through other comprehensive income*
Obligasi tingkat bunga tetap	15/01/2024 - 15/08/2051	*Fixed rate bonds*
Obligasi tingkat bunga mengambang	25/04/2025	*Floating rate bonds*
Biaya perolehan diamortisasi		*Amortised cost*
Obligasi tingkat bunga tetap	05/01/2024 - 15/05/2048	*Fixed rate bonds*

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai / *c. Gross carrying amount and allowance for impairment losses*

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Obligasi Pemerintah yang diukur pada biaya perolehan diamortisasi					***Government Bond at amortised cost***
Saldo awal	36,363,265	-	-	36,363,265	*Beginning balance*
Pengukuran kembali bersih	(291,317)	-	-	(291,317)	*Net remeasurement*
Aset keuangan baru yang diterbitkan atau dibeli	585,596	-	-	585,596	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	552,511	-	-	552,511	*Foreign exchange and other movements*
	37,210,055	**-**	**-**	**37,210,055**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

13. GOVERNMENT BONDS *(continued)*

c. Gross carrying amount and allowance for impairment losses *(continued)*

Movements in the gross carrying amount are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bond at fair value through other comprehensive income***
Saldo awal	86,549,332	-	-	86,549,332	*Beginning balance*
Pengukuran kembali bersih*)	(14,720,011)	-	-	(14,720,011)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	18,666,108	-	-	18,666,108	*New financial assets originated or purchased*
Pembayaran penuh	(429,531)	-	-	(429,531)	*Fully repayment*
Valuta asing dan perubahan lain	838,543	-	-	838,543	*Foreign exchange and other movements*
	90,904,441	**-**	**-**	**90,904,441**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan Obligasi Pemerintah

Including in the net measurement is sales of Government Bonds)*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada biaya perolehan diamortisasi					***Government Bond at amortised cost***
Saldo awal	37,189,018	-	-	37,189,018	*Beginning balance*
Pengukuran kembali bersih*)	(2,061,543)	-	-	(2,061,543)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,382,109	-	-	1,382,109	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	(146,319)	-	-	(146,319)	*Foreign exchange and other movements*
	36,363,265	**-**	**-**	**36,363,265**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan Obligasi Pemerintah

*Including in the net measurement is sales of Government Bonds *)*

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

13. GOVERNMENT BONDS *(continued)*

c. Gross carrying amount and allowance for impairment losses *(continued)*

Movements in the gross carrying amount are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bond at fair value through other comprehensive income***
Saldo awal	82,328,187	-	-	82,328,187	*Beginning balance*
Pengukuran kembali bersih*)	(18,285,352)	-	-	(18,285,352)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	24,012,908	-	-	24,012,908	*New financial assets originated or purchased*
Pembayaran penuh	(1,065,523)	-	-	(1,065,523)	*Fully repayment*
Valuta asing dan perubahan lain	(440,888)	-	-	(440,888)	*Foreign exchange and other movements*
	86,549,332	**-**	**-**	**86,549,332**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan Obligasi Pemerintah

Including in the net measurement is sales of Government Bonds)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada biaya biaya perolehan diamortisasi					***Government Bond at amortised cost***
Saldo awal	1,504	-	-	1,504	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	1,287	-	-	1,287	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	96	-	-	96	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	101	-	-	101	*Foreign exchange and other movements*
	2,988	**-**	**-**	**2,988**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

13. GOVERNMENT BONDS *(continued)*

c. Gross carrying amount and allowance for impairment losses *(continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total**)**	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bond at fair value through other comprehensive income***
Saldo awal	1,980	-	-	1,980	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	2,048	-	-	2,048	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	85	-	-	85	*New financial assets originated or purchased*
Pembayaran penuh	-	-	-	-	*Fully repayment*
Valuta asing dan perubahan lain	140	-	-	140	*Foreign exchange and other movements*
	4,253	**-**	**-**	**4,253**	

*) Cadangan kerugian penurunan nilai pada Obligasi Pemerintah dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

*) *Allowance for impairment losses on Government Bonds classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada biaya biaya perolehan diamortisasi					***Government Bond at amortised cost***
Saldo awal	1,391	-	-	1,391	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(172)	-	-	(172)	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	293	-	-	293	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	(8)	-	-	(8)	*Foreign exchange and other movements*
	1,504	**-**	**-**	**1,504**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

13. GOVERNMENT BONDS *(continued)*

c. Gross carrying amount and allowance for impairment losses *(continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total**/	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bond at fair value through other comprehensive income***
Saldo awal	2,558	-	-	2,558	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(545)	-	-	(545)	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	*New financial assets originated or purchased*
Pembayaran penuh	-	-	-	-	*Fully repayment*
Valuta asing dan perubahan lain	(33)	-	-	(33)	*Foreign exchange and other movements*
	1,980	**-**	**-**	**1,980**	

*) Cadangan kerugian penurunan nilai pada Obligasi Pemerintah dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

**) Allowance for impairment losses on Government Bonds classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses above is adequate.

d. Tingkat suku bunga tetap tahunan

d. Annual fixed interest rates

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Dolar Singapura/ *Singapore Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang/ *Japanese Yen* %	
Suku bunga:						*Interest rate:*
2024	4.88 - 12.00	0.50 - 7.75	0.50 - 1.25	0.90 - 1.75	0.57 - 3.00	*2024*
2023	3.88 - 12.00	0.50 - 7.75	0.50 - 1.25	0.90 - 1.75	0.57 - 3.00	*2023*

e. Tingkat suku bunga mengambang tahunan

e. Annual floating interest rates

	Rupiah %	*Dolar Amerika Serikat/ Unites States Dollar %*	
Suku bunga:			*Interest rate:*
2024	6.29	-	*2024*
2023	4.54	-	*2023*

14. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

14. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2024 dan 2023 terdiri dari:

Securities purchased under agreements to resell as of 31 December 2024 and 2023 are as follows:

2024

Counterparty	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Penjualan Kembali/ *Resale Amount*	Pendapatan Bunga yang Belum Direalisasi/ *Unrealised Interest*	Nilai Tercatat/ *Carrying Value*
Pihak ketiga/*Third parties*							
Bank BNP Paribas Indonesia	OBN	250,000	23/12/2024	06/01/2025	249,769	223	249,546
Bank Capital Indonesia	OBN	200,000	09/12/2024	06/01/2025	196,780	178	196,602
Bank Capital Indonesia	OBN	200,000	10/12/2024	07/01/2025	196,816	214	196,602
Bank Central Asia Tbk	OBN	500,000	19/12/2024	02/01/2025	498,201	89	498,112
Bank China Construction Bank Ind	OBN	150,000	09/12/2024	06/01/2025	142,898	129	142,769
Bank China Construction Bank Ind	OBN	150,000	09/12/2024	06/01/2025	142,706	129	142,577
Bank China Construction Bank Ind	OBN	200,000	10/12/2024	07/01/2025	190,049	207	189,842
Bank China Construction Bank Ind	OBN	80,000	17/12/2024	14/01/2025	79,936	188	79,748
Bank CIMB Niaga Tbk	OBN	500,000	05/12/2024	02/01/2025	470,041	85	469,956
Bank CIMB Niaga Tbk	OBN	350,000	23/12/2024	20/01/2025	340,279	1,171	339,108
Bank DBS Indonesia	OBN	100,000	03/12/2024	03/01/2025	97,980	36	97,944
Bank DBS Indonesia	OBN	500,000	04/12/2024	02/01/2025	483,785	88	483,697
Bank DBS Indonesia	OBN	250,000	12/12/2024	09/01/2025	241,189	349	240,840
Bank DBS Indonesia	OBN	50,000	18/10/2024	16/01/2025	49,088	136	48,952
Bank DBS Indonesia	OBN	50,000	18/10/2024	16/01/2025	49,088	136	48,952
Bank DBS Indonesia	OBN	200,000	25/11/2024	30/01/2025	193,365	1,040	192,325
Bank Indonesia, Jakarta	OBN	50,000	23/10/2024	22/01/2025	49,148	187	48,961
Bank Indonesia, Jakarta	OBN	50,000	23/10/2024	22/01/2025	49,150	191	48,959
Bank Indonesia, Jakarta	OBN	50,000	28/11/2024	26/02/2025	48,305	499	47,806
Bank Indonesia, Jakarta	OBN	50,000	28/11/2024	26/02/2025	48,301	496	47,805
Bank Maybank Indonesia Tbk	OBN	100,000	12/12/2024	09/01/2025	92,448	134	92,314
Bank Maybank Indonesia Tbk	OBN	50,000	12/12/2024	09/01/2025	46,224	67	46,157
Bank Maybank Indonesia Tbk	OBN	50,000	12/12/2024	09/01/2025	47,494	69	47,425
Bank National Nobu Tbk	OBN	150,000	23/12/2024	06/01/2025	145,511	130	145,381
Bank National Nobu Tbk	OBN	100,000	23/12/2024	06/01/2025	97,124	87	97,037
Bank Sinar Mas Tbk	OBN	250,000	09/12/2024	06/01/2025	232,079	210	231,869
Bank Victoria International Tbk	OBN	100,000	20/12/2024	20/01/2025	98,429	343	98,086
BPD Jawa Barat Dan Banten Tbk	OBN	150,000	23/12/2024	06/01/2025	137,829	123	137,706
BPD Jawa Barat Dan Banten Tbk	OBN	250,000	30/12/2024	13/01/2025	242,049	519	241,530
BPD Jawa Barat Dan Banten Tbk	OBN	250,000	30/12/2024	13/01/2025	242,332	520	241,812
BPD Jawa Timur	OBN	250,000	30/12/2024	13/01/2025	230,464	494	229,970
BPD Jawa Timur	OBN	250,000	30/12/2024	13/01/2025	230,464	494	229,970
Deutsche Bank, Jakarta	OBN	5,000	11/12/2024	08/01/2025	5,078	7	5,071
Deutsche Bank, Jakarta	OBN	5,000	18/12/2024	02/01/2025	4,911	-	4,911
Deutsche Bank, Jakarta	OBN	5,000	23/12/2024	06/01/2025	4,912	4	4,908
Pan Indonesia Bank Tbk	OBN	500,000	17/12/2024	14/01/2025	473,091	1,113	471,978
Standard Chartered Bank, Jkt	OBN	5,000	27/12/2024	10/01/2025	4,852	7	4,845
Bank Indonesia	OBN	200,000	30/12/2024	06/01/2025	196,305	163	196,142
Bank Indonesia	OBN	500,000	31/12/2024	07/01/2025	495,016	495	494,521
HSBC Ltd	OBN	321,900	18/12/2024	17/01/2025	326,706	641	326,065
HSBC Ltd	OBN	321,900	18/12/2024	17/01/2025	326,706	642	326,064
HSBC Ltd	OBN	321,900	23/12/2024	23/01/2025	325,561	642	324,919
HSBC Ltd	OBN	160,950	23/12/2024	23/01/2025	162,781	642	162,139
		8,226,650			**7,985,240**	**13,317**	**7,971,923**

14. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI (lanjutan)

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2024 dan 2023 terdiri dari: (lanjutan)

14. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL (continued)

Securities purchased under agreements to resell as of 31 December 2024 and 2023 are as follows: (continued)

2023

Counterparty	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Penjualan Kembali/ *Resale Amount*	Pendapatan Bunga yang Belum Direalisasi/ *Unrealised Interest*	Nilai Tercatat/ *Carrying Value*
Pihak ketiga/*Third parties*							
Bank Indonesia	OBN	3,000,000	29/12/2023	05/01/2024	2,850,197	2,847	2,847,350
Bank Indonesia	OBN	2,000,000	29/12/2023	05/01/2024	1,905,534	1,904	1,903,630
Bank Indonesia	OBN	1,662,000	29/12/2023	05/01/2024	1,583,499	1,582	1,581,917
Bank Indonesia	OBN	1,338,000	29/12/2023	05/01/2024	1,271,188	1,270	1,269,918
Bank Indonesia	OBN	1,000,000	29/12/2023	05/01/2024	959,212	1,118	958,094
Bank Indonesia	OBN	800,000	28/12/2023	04/01/2024	771,114	898	770,216
Bank Indonesia	OBN	800,000	27/12/2023	03/01/2024	766,999	894	766,105
Bank Indonesia	OBN	700,000	03/03/2023	01/03/2024	691,222	7,449	683,773
Bank Indonesia	OBN	500,000	17/02/2023	16/02/2024	498,290	4,169	494,121
Bank Indonesia	OBN	300,000	28/12/2023	04/01/2024	288,369	239	288,130
Bank Indonesia	OBN	300,000	27/12/2023	03/01/2024	287,625	192	287,433
Bank Indonesia	OBN	250,000	24/02/2023	23/02/2024	249,505	15,830	233,675
PT Bank CIMB Niaga Tbk	OBN	200,000	12/10/2023	11/01/2024	197,501	418	197,083
HSBC Ltd	OBN	148,372	26/12/2023	25/01/2024	149,034	88	148,946
DBS Bank Ltd	OBN	147,965	22/12/2023	05/01/2024	148,272	529	147,743
PT Bank CIMB Niaga Tbk	OBN	100,000	12/10/2023	11/01/2024	98,751	209	98,542
Bank Indonesia	OBN	100,000	23/06/2023	21/06/2024	102,715	6,243	96,472
Bank Indonesia	OBN	100,000	18/08/2023	16/08/2024	102,305	6,227	96,078
Bank Indonesia	OBN	100,000	21/07/2023	19/07/2024	101,746	6,193	95,553
Bank Indonesia	OBN	100,000	17/02/2023	16/02/2024	99,370	6,305	93,065
Bank Indonesia	OBN	50,000	18/08/2023	17/05/2024	50,559	2,340	48,219
Bank Indonesia	OBN	50,000	04/08/2023	03/05/2024	50,428	2,334	48,094
Bank Indonesia	OBN	50,000	04/08/2023	02/08/2024	50,848	3,095	47,753
Bank Indonesia	OBN	50,000	10/02/2023	09/02/2024	50,946	3,232	47,714
Bank Indonesia	OBN	50,000	18/08/2023	16/02/2024	49,157	1,518	47,639
Bank Indonesia	OBN	50,000	07/07/2023	05/07/2024	50,565	3,073	47,492
Bank Indonesia	OBN	50,000	09/06/2023	07/06/2024	49,837	2,984	46,853
Bank Indonesia	OBN	50,000	04/08/2023	02/02/2024	48,343	1,499	46,844
Bank Indonesia	OBN	50,000	28/04/2023	26/01/2024	49,129	2,308	46,821
Bank Indonesia	OBN	50,000	09/06/2023	08/03/2024	48,971	2,233	46,738
Bank Indonesia	OBN	50,000	14/07/2023	12/04/2024	48,842	2,260	46,582
Bank Indonesia	OBN	50,000	31/03/2023	01/04/2024	49,597	3,077	46,520
Bank Indonesia	OBN	50,000	21/07/2023	19/01/2024	47,858	1,487	46,371
Bank Indonesia	OBN	50,000	21/07/2023	19/04/2024	48,622	2,251	46,371
Bank Indonesia	OBN	50,000	14/07/2023	12/07/2024	49,304	2,997	46,307
Bank Indonesia	OBN	30,000	25/10/2023	24/01/2024	29,143	464	28,679
Bank Indonesia	OBN	30,000	19/05/2023	17/05/2024	29,839	1,840	27,999
Bank Indonesia	OBN	30,000	14/04/2023	12/04/2024	29,825	1,831	27,994
Bank Indonesia	OBN	30,000	14/04/2023	12/01/2024	29,340	1,379	27,961
Bank Indonesia	OBN	30,000	05/05/2023	03/05/2024	29,749	1,835	27,914
Bank Indonesia	OBN	30,000	28/04/2023	26/04/2024	29,693	1,828	27,865
Bank Indonesia	OBN	20,000	12/05/2023	10/05/2024	20,003	1,233	18,770
		14,596,337			**14,063,046**	**111,702**	**13,951,344**

Kolektabilitas efek-efek dengan janji dijual kembali sesuai dengan peraturan OJK diungkapkan pada Catatan 59i.

Collectibility securities purchased under agreements to resell in accordance with OJK regulation are disclosed in Note 59i.

Tingkat suku bunga tetap tahunan:

Annual fixed interest rates:

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Suku bunga kontrak:			*Contractual interest rate:*
2024	6.45 - 6.80	4.37 - 4.57	*2024*
2023	6.00 - 6.70	5.33 - 5.35	*2023*

15. BEBAN DIBAYAR DI MUKA / *15. PREPAID EXPENSES*

Beban dibayar di muka terdiri dari: / *Prepaid expenses consist of:*

	2024	2023	
Asuransi	1,559,420	1,806,064	*Insurance*
Perbaikan dan pemeliharaan	336,954	316,947	*Service and maintenance*
Sewa dibayar di muka	276,194	330,586	*Prepaid rent*
Promosi	128,661	64,462	*Promotion*
Biaya tangguhan	12,590	55,510	*Deferred expenses*
Lainnya	627,290	169,761	*Others*
	2,941,109	**2,743,330**	

16. INVESTASI PADA ENTITAS ASOSIASI / *16. INVESTMENTS IN ASSOCIATE*

Otoritas Jasa Keuangan (OJK) Pasar Modal telah menyetujui pernyataan penggabungan usaha PT BRI Syariah Tbk, PT Bank BNI Syariah dan PT Bank Syariah Mandiri melalui surat No. S-289/D.04/2020 tertanggal 11 Desember 2020 serta melalui surat OJK Perbankan No. 4/KDK.03/2021 tanggal 27 Januari 2021. Penggabungan usaha tersebut berlaku efektif di tanggal 1 Februari 2021 dan hasil penggabungan usaha akan menggunakan nama PT Bank Syariah Indonesia Tbk.

The Financial Service Authority (OJK) Capital Market has approved the statement of merger of businesses of PT BRI Syariah Tbk, PT Bank BNI Syariah and PT Bank Syariah Mandiri through letter No. S-289/D.04/2020 dated 11 December 2020 and OJK Perbankan through letter No. 4/KDK.03/2021 dated 27 January 2021. The merger of businesses is effective on 1 February 2021 and the merger of businesses result will use name of PT Bank Syariah Indonesia Tbk.

Pada tanggal 19 Desember 2022, PT Bank Syariah Indonesia Tbk ("BSI") melakukan Penawaran Umum Terbatas dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu (HMETD) sebanyak 4.999.952.795 saham. Grup berhak membeli saham baru sebanyak 1.242.439.344 saham dengan harga Rp1.000 (nilai penuh) per lembar saham. Grup menggunakan sebagian HMETD dan meningkatkan penyertaan modal sahamnya terhadap BSI sebanyak 500.000.000 saham dengan harga Rp500.000. Sisa HMETD Grup dialihkan ke PT CIMB Sekuritas dimana Grup mendapatkan kas sebesar Rp74.244. Peningkatan dalam penyertaan modal terhadap BSI menyebabkan persentase kepemilikan terhadap BSI terdilusi menjadi 23,24% dan Grup membukukan keuntungan dari saham terdilusi senilai Rp46.794.

On 19 December 2022, PT Bank Syariah Indonesia Tbk ("BSI") undertook a Limited Public Offering through the issuance of pre-emptive rights of 4,999,952,795 shares. Group was entitled to buy new 1,242,439,344 shares for Rp1,000 (full amount) per share. Group increased its capital through the pre-emptive rights to BSI by 500,000,000 shares with total price of Rp500,000. Remaining pre-emptive rights of the Group was transferred to PT CIMB Sekuritas whereas Group gain cash amounted to Rp74,244. Increased capital to BSI lead to Group percentage of ownership diluted to 23.24% and Group recorded gain from diluted shares of Rp46,794.

16. INVESTASI PADA ENTITAS ASOSIASI (lanjutan) / *16. INVESTMENT IN ASSOCIATES (continued)*

Pada tanggal 31 Desember 2024 dan 2023, entitas asosiasi yang dimiliki oleh Grup adalah sebagai berikut:

As of 31 December 2024 and 2023, the associate of the Group was as follow:

Nama Perusahaan	Kegiatan Usaha/ *Business Activity*	Persentase Kepemilikan/ *Percentage of Ownership*	Nilai tercatat/ *Carrying Value*	*Company Name*
	2024			
PT Bank Syariah Indonesia Tbk	Perbankan/*Banking*	23.24%	12,748,127	*PT Bank Syariah Indonesia Tbk*
	2023			
PT Bank Syariah Indonesia Tbk	Perbankan/*Banking*	23.24%	11,283,466	*PT Bank Syariah Indonesia Tbk*

Berikut ini adalah ringkasan informasi keuangan PT Bank Syariah Indonesia Tbk yang digunakan untuk pencatatan metode ekuitas pada tanggal 31 Desember 2024 dan 2023, dan untuk tahun yang berakhir pada tanggal-tanggal tersebut, yang dicatat dengan menggunakan metode ekuitas.

The following table is the summarised financial information for PT Bank Syariah Indonesia Tbk used for equity method accounting as of 31 December 2024 and 2023, and for the years then ended, which are accounted for using the equity method.

	2024	2023	
Aset	408,613,432	353,624,125	*Assets*
Liabilitas	363,571,858	314,885,003	*Liabilities*
Aset bersih	45,041,574	38,739,122	*Net assets*

	2024	2023	
Pendapatan	30,854,683	22,251,743	*Revenue*
Laba bersih periode berjalan	7,005,888	5,703,743	*Net income for the period ended*
Penghasilan komprehensif lain setelah pajak	152,124	34,189	*Other comprehensive income after tax*
Jumlah penghasilan komprehensif tahun berjalan	7,158,012	5,737,932	*Total comprehensive income for the year*

Jumlah bagian Grup atas penghasilan komprehensif dan jumlah tercatat pada entitas asosiasi adalah sebagai berikut:

Total Group's share of comprehensive income and carrying value of associates are as follows:

	2024	2023	
Saldo awal	11,283,466	10,048,975	*Beginning balance*
Bagian atas laba bersih	1,628,136	1,325,550	*Share of net income*
Bagian atas laba komprehensif lain	35,354	7,946	*Share of other comprehensive gain*
Jumlah bagian atas penghasilan komprehensif	1,663,490	1,333,496	*Total share of comprehensive income*
Dividen yang diterima	(198,829)	(99,005)	*Dividend received*
Jumlah tercatat	12,748,127	11,283,466	*Carrying value*

16. INVESTASI PADA ENTITAS ASOSIASI (lanjutan)

16. INVESTMENT IN ASSOCIATES (continued)

Rekonsiliasi atas ringkasan informasi keuangan yang disajikan terhadap nilai buku dari kepentingan entitas asosiasi adalah sebagai berikut:

Reconciliation of the summarised financial information presented to the carrying amount of its interest in associate is as follows:

	2024	2023	
Saldo awal tahun	38,739,122	33,505,610	*Beginning balance of the year*
Laba bersih periode berjalan	7,005,888	5,703,743	*Net income for the year*
Penghasilan komprehensif lain setelah pajak	152,124	34,189	*Other comprehensive income after tax*
Pembayaran dividen	(855,560)	(426,019)	*Dividend payment*
Lain-lain	-	(78,401)	*Others*
	45,041,574	38,739,122	
Persentase kepemilikan efektif	23.24%	23.24%	*Percentage of effective ownership*
	10,485,856	9,021,195	
Goodwill	2,262,271	2,262,271	*Goodwill*
Nilai tercatat	12,748,127	11,283,466	*Carrying value*

Pada tanggal 31 Desember 2024, nilai wajar kepemilikan saham Grup pada PT Bank Syariah Indonesia Tbk, perusahaan yang terdaftar pada BEI, adalah Rp29.266.229 (31 Desember 2023: Rp18.653.201) menggunakan harga penutupan tanggal 30 Desember 2024.

As at 31 December 2024, the fair value of the Group's interest in PT Bank Syariah Indonesia, which is listed on the IDX, was Rp29,266,229 (31 December 2023: Rp18,653,201) using the closing price on 30 December 2024.

17. PENYERTAAN SAHAM - BERSIH

17. EQUITY INVESTMENTS - NET

Penyertaan jangka panjang

Long-term equity investments

	Nilai Wajar/ *Fair Value*		
	2024	2023	
Klasifikasi nilai wajar melalui penghasilan komprehensif lain	637,280	563,700	*Classified as fair value through other comprehensive income*

Penyertaan jangka panjang berdasarkan kolektibilitas sesuai Peraturan OJK diungkapkan pada Catatan 59j.

The classification of long-term equity investments based on Financial Service Authority Rule collectibility are disclosed in Note 59j.

Grup mengklasifikasikan investasi berikut pada nilai wajar melalui penghasilan komprehensif lain. Klasifikasi pada nilai wajar melalui penghasilan komprehensif lain dibuat dengan pertimbangan investasi akan dimiliki dalam jangka panjang untuk kepentingan strategis.

The Group designated certain investment as at fair value through comprehensive income (FVOCI). The FVOCI designation was made because the investments are expected to be held for the long-term strategic purposes.

17. PENYERTAAN SAHAM - BERSIH (lanjutan) / *17. EQUITY INVESTMENTS - NET (continued)*

Penyertaan saham terdiri dari: / *Equity investment consist of:*

Nama Perusahaan/*Company Name*	2024 Persentase Kepemilikan/ *Percentage of Ownership*	2023 Persentase Kepemilikan/ *Percentage of Ownership*	2024 Biaya perolehan/ *Acquisition cost*	2024 Nilai wajar/ *Fair value*	2023 Biaya perolehan/ *Acquisition cost*	2023 Nilai wajar/ *Fair value*
Nilai wajar melalui penghasilan komprehensif lain/*fair value through other comprehensive income*						
PT Fintek Karya Nusantara	9.82%	9.82%	200,000	369,614	200,000	377,547
PT Bank Mizuho Indonesia	1.00%	1.00%	75,375	75,375	75,375	75,375
PT Bank BTPN Tbk	0.11%	0.15%	19,250	26,896	19,250	31,579
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	17.50%	17.50%	3,500	71,019	3,500	23,288
PT Kustodian Sentral Efek Indonesia	2.50%	2.50%	7,500	7,500	7,500	7,500
PT Pemeringkat Efek Indonesia	0.14%	0.14%	158	158	158	158
PT Bursa Efek Indonesia	1.20%	1.20%	7,500	7,500	7,500	7,500
PT Kliring Penjaminan Efek Indonesia	1.11%	1.11%	20,000	20,000	-	-
Lain-lain/*Others*	0.03%	0.03%	14,434	14,434	9,236	9,236
			347,717	592,496	322,519	532,183
Nilai wajar melalui laba rugi/ *fair value through profit or loss*						
Lain-lain/*Others*	1.35%-20.00%	2.50%	40,392	44,784	31,517	31,517
			388,109	637,280	354,036	563,700

18. ASET LAIN-LAIN - BERSIH / *18. OTHER ASSETS - NET*

Aset lain-lain - bersih terdiri dari: / *Other assets - net consist of:*

	2024	2023	
Piutang bunga	4,764,476	4,331,026	*Interest receivables*
Piutang lain-lain setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp1.031.857 pada tanggal 31 Desember 2024 dan Rp656.600 pada tanggal 31 Desember 2023	2,515,071	2,679,406	*Other receivables, net of allowance for impairment losses of Rp1,031,857 as of 31 December 2024 and Rp 656,600 as of 31 December 2023*
Piutang terkait transaksi ATM dan kartu kredit	1,579,054	3,662,144	*Receivables from transactions related to ATM and credit card*
Agunan yang diambil alih setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp772.964 pada tanggal 31 Desember 2024 dan Rp788.713 pada tanggal 31 Desember 2023	914,825	897,057	*Foreclosed collaterals, net of allowance for impairment losses of Rp772,964 as of 31 December 2024 and Rp788,713 as of 31 December 2023*
Term Deposit Valas Devisa Hasil Ekspor	909,368	2,540,505	*Foreign Exchange Term Deposit from Export Activities*
Persediaan kantor	446,588	228,388	*Office supplies*
Piutang nasabah - Entitas Anak	307,236	371,927	*Receivables from customers - Subsidiary*
Beban komisi ditangguhkan	51,111	53,845	*Deferred commission expenses*
Lain-lain setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.758 pada tanggal 31 Desember 2024 dan Rp27.408 pada tanggal 31 Desember 2023	2,619,338	2,207,899	*Others, net of allowance for impairment losses of Rp27,758 as of 31 December 2024 and Rp27,408 as of 31 December 2023*
	14,107,067	**16,972,197**	

18. ASET LAIN-LAIN - BERSIH (lanjutan)

Pada tanggal 31 Desember 2024, piutang bunga sebagian besar merupakan bunga yang berasal dari pinjaman yang diberikan dan Obligasi Pemerintah masing-masing sebesar Rp2.258.031 dan Rp1.884.514 (31 Desember 2023: Rp1.885.321 dan Rp1.798.596).

Piutang lain-lain sebagian besar merupakan imbal jasa penjaminan, piutang kepada pemerintah dan piutang transaksi penjaminan emisi efek.

BNI telah melakukan upaya penyelesaian atas agunan yang diambil alih dengan melakukan upaya penjualan dalam bentuk lelang atau pengambilalihan agunan oleh investor atas agunan yang diambil alih.

Properti terbengkalai termasuk di dalam pos "Lain-lain" sebesar Rp2.279 setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.715 dan akumulasi penyusutan properti terbengkalai sebesar Rp1.995 pada tanggal 31 Desember 2024 dan sebesar Rp2.734 setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.260 dan akumulasi penyusutan properti terbengkalai sebesar Rp1.995 pada tanggal 31 Desember 2023.

BNI telah melakukan upaya penyelesaian atas properti terbengkalai dalam bentuk pemanfaatan untuk kegiatan operasional Bank (kantor, outlet, galeri, rumah dinas dan gudang kearsipan).

Term Deposit Valas Devisa Hasil Ekspor merupakan suatu instrumen dimana dana devisa hasil ekspor dari rekening khusus eksportir ditempatkan pada Bank Indonesia melalui rekening Bank sesuai mekanisme pasar.

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang dibentuk atas aset-aset yang disebutkan di atas telah memadai.

***18. OTHER ASSETS - NET** (continued)*

As of 31 December 2024, interest receivables are mostly comprised of interest from loans and Government Bonds amounting to Rp2,258,031 and Rp1,884,514, respectively (31 December 2023: Rp1,885,321 and Rp1,798,596).

Other receivables mostly comprised of guarantee fee, governments receivables and receivables from underwriting activities.

BNI has made efforts to settle foreclosed collaterals by making an attempt to sell in the form of an auction or take over of collateral by investors on foreclosed collaterals.

Abandoned properties are included in "Others" amounting to Rp2,279, net of allowance for impairment losses of Rp27,715, and accumulated depreciation of Rp1,995, as of 31 December 2024 and amounting to Rp2,734, net of allowance for impairment losses of Rp27,260, and accumulated depreciation of Rp1,995, as of 31 December 2023.

BNI has made efforts to resolve abandoned properties by utilising them for the Bank's operational activities (offices, outlets, gallery, official houses and warehouse).

Term Deposits of Foreign Exchange from Export Proceeds is an instrument where foreign exchange from export proceeds from exporters' special account are placed in Bank Indonesia through Bank's accounts in accordance with market mechanisms.

Management believes that the allowance for impairment losses on the respective assets outlined above is adequate.

19. ASET TETAP DAN ASET HAK-GUNA / *19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS*

	2024						
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Disposals*	Reklasifikasi/ *Reclassification*	Revaluasi/ *Revaluation*	Saldo akhir/ *Ending balance*	
Aset kepemilikan langsung:							*Direct ownership assets:*
Tanah	16,364,369	51,946	(32,965)	-	785,488	17,168,838	*Land*
Bangunan	9,245,305	726,526	(676,277)	80,497	593,454	9,969,505	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	15,186,865	1,043,181	(403,650)	473,472	-	16,299,868	*Office equipment and motor vehicles*
Aset dalam penyelesaian	1,239,297	1,832,400	(250,389)	(553,969)	-	2,267,339	*Construction in progress*
	42,035,836	3,654,053	(1,363,281)	-	1,378,942	45,705,550	
Aset sewa pembiayaan:							*Leased assets:*
Aset hak-guna	2,652,014	1,168,843	(710,464)	-	-	3,110,393	*Right-of-use of assets*
	44,687,850	4,822,896	(2,073,745)	-	1,378,942	48,815,943	
Akumulasi Penyusutan:							*Accumulated depreciation:*
Bangunan	3,365,881	579,741	(78,951)	-	9,891	3,876,562	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	12,317,256	1,092,531	(235,074)	-	-	13,174,713	*Office equipment and motor vehicles*
	15,683,137	1,672,272	(314,025)	-	9,891	17,051,275	
Aset sewa pembiayaan:							*Leased assets:*
Aset hak-guna	1,239,857	734,629	(618,054)	-	-	1,356,432	*Right-of-use of assets*
	16,922,994	2,406,901	(932,079)	-	9,891	18,407,707	
Nilai buku bersih	**27,764,856**					**30,408,236**	***Net book value***

	2023						
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Disposals*	Reklasifikasi/ *Reclassification*	Revaluasi/ *Revaluation*)*	Saldo akhir/ *Ending balance*	
Aset kepemilikan langsung:							*Direct ownership assets:*
Tanah	16,023,337	215,683	(3,282)	119,116	9,515	16,364,369	*Land*
Bangunan	8,723,683	318,036	(11,688)	214,792	482	9,245,305	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	13,958,270	1,104,159	(198,916)	323,352	-	15,186,865	*Office equipment and motor vehicles*
Aset dalam penyelesaian	707,409	1,192,915	(3,767)	(657,260)	-	1,239,297	*Construction in progress*
	39,412,699	2,830,793	(217,653)	-	9,997	42,035,836	
Aset sewa pembiayaan:							*Leased assets:*
Aset hak-guna	2,342,759	705,655	(396,400)	-	-	2,652,014	*Right-of-use of assets*
	41,755,458	3,536,448	(614,053)	-	9,997	44,687,850	
Akumulasi penyusutan:							*Accumulated depreciation:*
Bangunan	2,813,741	559,294	(7,154)	-	-	3,365,881	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	11,345,144	1,159,922	(187,810)	-	-	12,317,256	*Office equipment and motor vehicles*
	14,158,885	1,719,216	(194,964)	-	-	15,683,137	
Aset sewa pembiayaan:							*Leased assets:*
Aset hak-guna	1,047,680	585,308	(393,131)	-	-	1,239,857	*Right-of-use of assets*
	15,206,565	2,304,524	(588,095)	-	-	16,922,994	
Nilai buku bersih	**26,548,893**					**27,764,856**	***Net book value***

*) Nilai revaluasi aset tetap merupakan hasil penilaian kembali aset tetap Entitas Anak.

*The revaluation value of fixed assets is the result of re-appraisal of the Subsidiary fixed assets *)*

Pada tanggal 31 Desember 2024 dan 2023, Grup melakukan peninjauan kembali atas masa manfaat, metode penyusutan, dan nilai residu aset tetap dan menyimpulkan bahwa tidak terdapat perubahan atas metode dan asumsi tersebut.

As of 31 December 2024 and 2023, the Group performed a review on useful life, depreciation method, and residual value of fixed assets and concluded that there was no change in those methodology and assumptions.

Beban penyusutan untuk tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp1.682.163 dan Rp1.719.216 dicatat pada beban umum dan administrasi pada laporan laba rugi.

Depreciation expense for the years ended 31 December 2024 and 2023 amounted to Rp1,682,163 and Rp1,719,216 are recorded on general and administrative expense in the statement of profit or loss.

Aset tetap yang telah terdepresiasi penuh namun masih digunakan oleh Grup sebesar Rp10.439.599 dan Rp9.616.323 masing-masing pada tanggal 31 Desember 2024 dan 2023, antara lain berupa perlengkapan kantor dan kendaraan bermotor.

The fixed assets that have been fully depreciated but still in use by the Group amounted to Rp10,439,599 and Rp9,616,323 as of 31 December 2024 and 2023, respectively, including, among others, office equipment and motor vehicles.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Manajemen berkeyakinan bahwa tidak terdapat penurunan nilai aset tetap yang dimiliki Grup selama tahun berjalan karena manajemen berpendapat bahwa nilai tercatat aset tetap tidak melebihi estimasi nilai yang dapat diperoleh kembali.

Aset tetap Bank pada tanggal 31 Desember 2024 diasuransikan terhadap risiko kebakaran dan pencurian dengan nilai pertanggungan sebesar Rp17.308.556 (31 Desember 2023: Rp18.714.609). Manajemen berpendapat bahwa nilai pertanggungan tersebut cukup untuk menutupi kemungkinan kerugian atas aset tersebut.

Aset dalam penyelesaian pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

Management believes that there is no impairment in the value of fixed assets owned by the Group during the year because management believes that the carrying amounts of fixed assets do not exceed the estimated recoverable amount.

As of 31 December 2024, the fixed assets of the Bank were insured against risk of fire and theft with sum insured amounting to Rp17,308,556 (31 December 2023: Rp18,714,609). Management believes that the sum insured is adequate to cover possible losses on the assets insured.

Construction in progress as of 31 December 2024 and 2023 are as follows:

	2024	2023	
Tanah	337	-	*Land*
Bangunan	1,336,241	450,350	*Buildings*
Peralatan kantor	930,761	788,947	*Office equipment*
	2,267,339	1,239,297	

Estimasi persentase tingkat penyelesaian aset dalam penyelesaian pada tanggal 31 Desember 2024 adalah berkisar antara 21% - 84% dan 31 Desember 2023: 89% - 97%. Aset dalam penyelesaian pada tanggal 31 Desember 2024 dan 2023 tersebut diperkirakan akan selesai masing-masing pada tahun 2026 dan 2024.

Tidak ada aset tetap yang dijaminkan.

Berdasarkan keputusan Ketua Badan Pengawas Pasar Modal Dan Lembaga Keuangan No. KEP-347/BL/2012 tanggal 25 Juni 2012 tentang Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik butir 27.e, dengan mempertimbangkan nilai buku aset tetap (tanah dan bangunan) yang telah dilakukan revaluasi pada tahun 2015, 2018 dan 2021, maka pada tahun 2024 Grup telah menugaskan perusahaan jasa penilai terdaftar untuk melaksanakan penilaian (revaluasi) aset tetap (tanah dan bangunan). Grup melakukan penilaian kembali atas tanah dan bangunan tersebut bukan untuk tujuan perpajakan tetapi hanya untuk pemenuhan ketentuan Bapepam dan LK tersebut.

Penilaian atas tanah dan bangunan dilakukan oleh penilai independen eksternal sebagai berikut:
a) KJPP Toha Okky Heru & Rekan
b) KJPP Rengganis Hamid & Rekan
c) KJPP Toto Suharto & Rekan
d) KJPP Abdullah Fitriantoro & Rekan

The estimated percentage of completion of construction in progress as of 31 December 2024 is between 21% - 84% and 31 December 2023: 89% - 97%. Those construction in progress as of 31 December 2024 and 2023 are estimated to be completed in 2026 and 2024, respectively.

There were no fixed assets pledged as collateral.

Based on Decision of Chairman of Bapepam and LK No. KEP-347/BL/2012 dated 25 June 2012, about the presentation and disclosure in financial report of issuer or a public company in point 27.e, by considering the book value of fixed assets (land and buildings) that on which revaluation has been conducted in 2015, 2018 and 2021, therefore in 2024, the Group assigned registered independent appraisers to appraise (revaluate) its fixed assets (land and buildings). The Group has revalued the value of that land and buildings not for tax purpose rather for the compliance of the aforementioned Bapepam and LK regulation.

The valuations of land and buildings are performed by the following external independent appraisers:
a) KJPP Toha Okky Heru & Rekan
b) KJPP Rengganis Hamid & Rekan
c) KJPP Toto Suharto & Rekan
d) KJPP Abdullah Fitriantoro & Rekan

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Penilaian dilakukan berdasarkan Standar Penilaian Indonesia, ditentukan berdasarkan transaksi pasar terkini dan dilakukan dengan ketentuan - ketentuan yang lazim. Metode penilaian yang dipakai adalah metode data pasar, metode biaya dan metode pendapatan. Elemen-elemen yang digunakan dalam perbandingan data untuk menentukan nilai wajar aset antara lain:

a) Jenis dan hak yang melekat pada properti
b) Kondisi pasar
c) Lokasi
d) Karakteristik fisik
e) Karakteristik dalam menghasilkan pendapatan
f) Karakteristik tanah

Informasi mengenai penilaian kembali aset tetap pada tanggal 31 Desember 2024 untuk kelompok aset tanah dan bangunan Grup di Indonesia dan luar negeri adalah sebagai berikut:

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

Valuations are performed based on Indonesian Valuation Standards, determined based on reference to recent market transactions done on arm's length terms and appropriate requirements. The valuation methods used are market value approach, cost approach and income approach. Elements used in data comparison to determine fair value of assets, among others are as follows:

a) Types and rights attached to the property
b) Market condition
c) Location
d) Physical characteristics
e) Income producing characteristics
f) Land characteristics

Information on revaluation of land and buildings of the Group on 31 December 2024 located in Indonesia and overseas are as follows:

	Nilai Buku sebelum Revaluasi/ *Carrying Amount Before Revaluation*	Nilai Buku Setelah Revaluasi/ *Carrying Amount after Revaluation*	Keuntungan Revaluasi bersih/ *Net gain revaluation*	
Tanah	16,206,563	16,992,051	785,488	*Land*
Bangunan	5,081,867	5,675,321	593,454	*Buildings*
Jumlah	**21,288,430**	**22,667,372**	**1,378,942**	***Total***

Penilaian kembali yang dilakukan atas tanah menghasilkan jumlah kenaikan nilai tercatat sebesar Rp785.488 yang terdiri dari kenaikan nilai tanah yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp785.730 dan penurunan nilai tanah yang diakui sebagai beban pada laba rugi tahun 2024 sebesar Rp242.

The revaluation of land resulted in an increase in the carrying amount of land amounting to Rp785,488 which consists of the increase in the carrying amount of land recognised as "Other Comprehensive Income" amounting to Rp785,730 and a decrease in carrying amount of land recognised in 2024 expenses in the profit/loss amounting to Rp242.

Kenaikan nilai tercatat yang timbul dari revaluasi bangunan dicatat sebesar Rp593.454. Kenaikan ini terdiri dari kenaikan nilai bangunan yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp589.920 dan yang diakui sebagai pendapatan pada laba rugi tahun 2024 sebesar Rp3.534.

Increase in carrying amount of buildings from the revaluation of building is recorded at Rp593,454. The increase consists of the increase in the carrying amount of buildings recognised in "Other Comprehensive Income" amounting to Rp589,920 and recognised in 2024 income in the profit/loss amounting to Rp3,534.

Secara total kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Penghasilan Komprehensif Lain" adalah sebesar Rp1.375.650. Kenaikan nilai tercatat yang timbul dari revaluasi dicatat sebagai pendapatan pada tahun 2024 adalah sebesar Rp3.292.

In total, the increase in the carrying amount from revaluation of land and buildings is recognised in "Other Comprehensive Income" amounting to Rp1,375,650. The increase of carrying amount from revaluation results recognised in 2024 income amounting to Rp3,292.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

Jika tanah dan bangunan dicatat sebesar harga perolehan, maka dicatat dalam jumlah sebagai berikut:

If land and buildings were recorded using historical cost basis, the amount would be as follows:

	2024	2023	
Tanah	1,772,751	1,773,261	*Land*
Bangunan			*Buildings*
Harga perolehan	2,984,245	2,972,139	*Cost*
Akumulasi penyusutan	(2,882,207)	(2,859,396)	*Accumulated depreciation*
Nilai buku bangunan	102,038	112,743	*Net book amount*
Jumlah nilai buku bersih	1,874,789	1,886,004	*Total net book value*

Perubahan cadangan revaluasi aset bersih setelah pajak adalah sebagai berikut:

The movements in the asset revaluation reserve net of tax are as follows:

	Cadangan revaluasi aset, bersih setelah pajak/ *Asset revaluation reserve, net of tax*	
Saldo per 31 Desember 2023	15,447,829	*Balance as of 31 December 2023*
Realisasi surplus revaluasi akibat dampak kehilangan pengendalian	1,263,566	*Revaluation surplus realization due to impact of loss of control*
Saldo per 31 Desember 2024	16,711,395	*Balance as of 31 December 2024*

	Cadangan revaluasi aset, bersih setelah pajak/ *Asset revaluation reserve, net of tax*	
Saldo per 31 Desember 2022	15,441,439	*Balance as of 31 December 2022*
Realisasi surplus revaluasi akibat dampak kehilangan pengendalian	6,390	*Revaluation surplus realization due to impact of loss of control*
Saldo per 31 Desember 2023	15,447,829	*Balance as of 31 December 2023*

Pada tanggal 31 Desember 2024 dan 2023, selain tanah dan bangunan, tidak terdapat perbedaan yang signifikan antara nilai wajar aset tetap dengan nilai tercatatnya.

As of 31 December 2024 and 2023, there is no significant difference between the fair value and carrying value of fixed assets other than land and buildings.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

Perhitungan keuntungan/(kerugian) penjualan dan penghapusan aset tetap sebagai berikut:

Calculation of gain/(loss) on sale and write-off of fixed assets as follows:

	2024	2023	
Harga perolehan	157,689	30,670	*Acquisition cost*
Akumulasi penyusutan	(142,176)	(25,967)	*Accumulated depreciation*
Nilai buku aset tetap yang dijual dan dihapus	15,513	4,703	*Book value of disposed fixed assets*
Hasil penjualan dan penghapusan aset tetap	26,713	13,119	*Proceeds from disposal of fixed assets*
Keuntungan dari penjualan dan penghapusan aset tetap	11,200	8,416	*Gain on sale and write-off of fixed assets*

Aset hak-guna pada 31 Desember 2024 dan 2023 adalah sebagai berikut:

Right-of-use of assets as of 31 December 2024 and 2023 as follows:

2024

	Saldo awal/ *Beginning balance*	*Penambahan/ Additions*	*Pengurangan/ Disposals*	Reklasifikasi/ *Reclassification*	Saldo akhir/ *Ending balance*	
Biaya perolehan						*Cost*
Tanah dan bangunan	2,585,309	703,770	(609,772)	-	2,679,307	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	66,705	465,073	(100,692)	-	431,086	*Office equipment and motor vehicles*
	2,652,014	1,168,843	(710,464)	-	3,110,393	
Akumulasi penyusutan						*Accumulated depreciation*
Tanah dan bangunan	1,188,905	650,647	(557,343)	-	1,282,209	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	50,952	83,982	(60,711)	-	74,223	*Office equipment and motor vehicles*
	1,239,857	734,629	(618,054)	-	1,356,432	
Nilai buku bersih	**1,412,157**				**1,753,961**	***Net book value***

2023

	Saldo awal/ *Beginning balance*	*Penambahan/ Additions*	*Pengurangan/ Disposals*	Reklasifikasi/ *Reclassification*	Saldo akhir/ *Ending balance*	
Biaya perolehan						*Cost*
Tanah dan bangunan	2,268,006	691,141	(373,838)	-	2,585,309	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	74,753	14,514	(22,562)	-	66,705	*Office equipment and motor vehicles*
	2,342,759	705,655	(396,400)	-	2,652,014	
Akumulasi penyusutan						*Accumulated depreciation*
Tanah dan bangunan	1,011,761	551,497	(374,353)	-	1,188,905	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	35,919	33,811	(18,778)	-	50,952	*Office equipment and motor vehicles*
	1,047,680	585,308	(393,131)	-	1,239,857	
Nilai buku bersih	**1,295,079**				**1,412,157**	***Net book value***

Grup menyewa beberapa aset termasuk rumah dinas, gedung kantor, ruang ATM, kendaraan dan lain-lain. Rata-rata masa sewa adalah 5 (lima) tahun.

The Group has rented a number of assets which include official houses, offices, ATM space, vehicle and others. The average of lease term is 5 (five) years.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Jumlah pengeluaran kas untuk sewa selama tahun yang berakhir pada 31 Desember 2024 adalah Rp870.149 (31 Desember 2023: Rp240.769).

Beban penyusutan untuk tahun yang berakhir pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp734.629 dan Rp585.308 dicatat pada beban umum dan administrasi pada laporan laba rugi.

19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS *(continued)*

The total cash outflow for leases for the year ended 31 December 2024 is amounting to Rp870,149 (31 December 2023: Rp240,769).

Depreciation expense for the year ended 31 December 2024 and 2023 amounted to Rp734,629 and Rp585,308 are recorded on general and administrative expense in the statement of profit or loss.

20. ASET TAKBERWUJUD

Aset takberwujud terdiri dari:

20. INTANGIBLE ASSETS

Intangible assets consist of the following:

	2024	2023	
Goodwill	727,786	727,786	*Goodwill*
Hubungan pelanggan	15,528	16,637	*Customer relationships*
	743,314	**744,423**	

Pada bulan Mei 2022, Grup telah mengakuisisi PT Bank Hibank Indonesia. Atas transaksi ini, Grup memperoleh *goodwill* dan aset takberwujud tertentu berupa kontrak hubungan pelanggan dan merek dagang.

In May 2022, the Group acquired PT Bank Hibank Indonesia. As a result of this acquisition, the Group recognised goodwill and certain intangible assets, such as contractual customer relationships and trademarks.

Penurunan nilai atas *goodwill*

Pengujian penurunan nilai atas *goodwill* yang dilakukan setiap tahun (pada tanggal 31 Desember) dan ketika terdapat suatu indikasi bahwa nilai tercatatnya mengalami penurunan nilai.

Nilai terpulihkan ditentukan berdasarkan perhitungan nilai wajar dikurangi biaya yang menggunakan metode *Discounted Cash Flow* 5 tahun. Grup menentukan unit penghasil kas ("UPK") sejalan dengan Bank Hibank sebagai UPK sendiri. Nilai tersebut dikategorikan berada dalam kategori pengukuran nilai wajar level 3.

Asumsi kunci yang digunakan dalam perhitungan nilai wajar dikurangi biaya untuk menjual pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

Impairment of goodwill

Goodwill are tested for impairment annually (as at 31 December) and when circumstances indicate that the carrying value may be impaired.

The recoverable amount was determined based on fair value less cost of disposal calculations that uses the 5 years Discounted Cash Flow method. The Group determine the cash generating unit ("CGU") aligned with the Bank Hibank as a separate CGU. The value is within the category of fair value measurement level 3.

Certain key assumptions used in the fair value less cost of disposal calculation at 31 December 2024 and 2023 are as follows

	2024	2023	
Tingkat pertumbuhan	4.95%	4.94%	*Growth rate*
Tingkat diskonto (WACC)	9.97%	9.80%	*Discount rate (WACC)*

Tidak ada penurunan nilai *goodwill* yang diidentifikasi.

No impairment of the goodwill was identified.

21. LIABILITAS SEGERA / *21. OBLIGATIONS DUE IMMEDIATELY*

	2024	2023	
Rupiah			***Rupiah***
Kewajiban sebagai *issuer* bank (ATM)	1,205,173	2,991,170	*Obligation as issuer bank*
Simpanan sementara yang belum diselesaikan	1,147,547	788,753	*Temporary deposit transactions not yet settled*
Setoran pajak sebagai bank persepsi	421,350	334,092	*Tax collection received by BNI as collecting bank*
Kerjasama pihak ketiga	294,763	306,886	*Third party agreements*
Dana *trust*	264,505	26,578	*Fund deposits for trust*
Dana setoran *smartpay*	222,426	224,059	*Fund deposits for smartpay*
Dana setoran cek	54,964	58,307	*Fund deposits for cheques*
Kiriman uang	47,774	135,863	*Money transfers*
Lainnya	529,897	113,447	*Others*
	4,188,399	4,979,155	
Mata uang asing			***Foreign currencies***
Dana *trust*	981,005	138,534	*Fund deposits for trust*
Simpanan sementara yang belum diselesaikan	198,926	14,424	*Temporary deposit transactions not yet settled*
Setoran pajak sebagai bank persepsi	79,194	77,146	*Tax collection received by BNI as collecting Bank*
Kiriman uang	59,205	33,682	*Money transfers*
Kerjasama pihak ketiga	4,598	50,634	*Third party agreements*
Lainnya	3,393	1,377	*Others*
	1,326,321	315,797	
	5,514,720	**5,294,952**	

22. SIMPANAN NASABAH / *22. DEPOSITS FROM CUSTOMERS*

Informasi mengenai simpanan berdasarkan pihak yang berelasi diungkapkan pada Catatan 45k.

Information with respect to transactions with related parties are disclosed in Note 45k.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2024	2023	
Rupiah			***Rupiah***
Tabungan	247,370,321	222,512,910	*Savings accounts*
Deposito berjangka	201,908,287	208,275,592	*Time deposits*
Giro	192,230,190	203,157,259	*Current accounts*
	641,508,798	633,945,761	
Mata uang asing			***Foreign currencies***
Giro	113,503,338	142,338,909	*Current accounts*
Deposito berjangka	40,324,680	24,389,388	*Time deposits*
Tabungan	10,174,032	9,468,525	*Savings accounts*
Negotiable Certificate of Deposits	-	587,760	*Negotiable Certificate of Deposits*
	164,002,050	176,784,582	
	805,510,848	**810,730,343**	

22. SIMPANAN NASABAH (lanjutan) / *22. DEPOSITS FROM CUSTOMERS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

Perincian simpanan nasabah berdasarkan mata uang adalah sebagai berikut:

Deposits from customers based on currencies are as follows:

	2024	2023	
Rupiah	641,508,798	633,945,761	*Rupiah*
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	151,199,658	165,780,761	*United States Dollar*
Yen Jepang	6,810,333	7,554,960	*Japanese Yen*
Dolar Singapura	2,464,309	752,273	*Singapore Dollar*
Yuan China	2,202,929	1,839,058	*Chinese Yuan*
Euro Eropa	1,162,954	721,360	*European Euro*
Dolar Australia	72,228	47,156	*Australian Dollar*
Dolar Hong Kong	43,879	50,901	*Hong Kong Dollar*
Pound Sterling Inggris	32,638	28,218	*Great Britain Pound Sterling*
Franc Swiss	6,948	4,560	*Swiss Franc*
Won Korea Selatan	2,174	2,253	*South Korean Won*
Lain-lain	4,000	3,082	*Others*
	164,002,050	176,784,582	
	805,510,848	**810,730,343**	

Berdasarkan Undang-Undang No. 24 tanggal 22 September 2004 yang berlaku efektif sejak tanggal 22 September 2005, sebagaimana diubah dengan Peraturan Pemerintah Pengganti Undang-Undang Republik Indonesia No. 3 tanggal 13 Oktober 2008, Lembaga Penjaminan Simpanan (LPS) dibentuk untuk menjamin liabilitas tertentu bank-bank umum berdasarkan program penjaminan yang berlaku, yang besaran nilai jaminannya dapat berubah jika memenuhi kriteria tertentu yang berlaku.

Based on Law No. 24 dated 22 September 2004, effective on 22 September 2005, which was amended by the Government Regulation No. 3 dated 13 October 2008, the Indonesia Deposit Insurance Corporation (LPS) was formed to guarantee certain liabilities of commercial banks under the applicable guarantee program, which the amount of guarantee can be amended if the situation complies with the valid particular criteria.

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66 Tahun 2008 tanggal 13 Oktober 2008 mengenai Besarnya Nilai Simpanan yang dijamin Lembaga Penjaminan Simpanan, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000 untuk per nasabah per bank.

Based on Government Regulation No. 66 Year 2008 dated 13 October 2008 regarding The Amount of Deposit Guaranteed by Indonesia Deposit Insurance Corporation, the amount of deposits covered by LPS is up to Rp2,000 per depositor per bank.

Pada tanggal 31 Desember 2024 dan 2023, BNI adalah peserta dari program penjaminan tersebut.

As of 31 December 2024 and 2023, BNI was a participant of the above guarantee program.

22. SIMPANAN NASABAH (lanjutan) / *22. DEPOSITS FROM CUSTOMERS (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Giro	45,504,242	64,848,639	*Current accounts*
Deposito berjangka	29,153,150	26,986,048	*Time deposits*
Tabungan	104,341	146,280	*Savings accounts*
	74,761,733	91,980,967	
Mata uang asing			***Foreign currencies***
Giro	30,233,977	55,991,467	*Current accounts*
Deposito berjangka	7,829,496	4,088,842	*Time deposits*
Tabungan	8,605	19,114	*Saving accounts*
	38,072,078	60,099,423	
Total pihak berelasi	112,833,811	152,080,390	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Tabungan	247,265,980	222,366,630	*Savings accounts*
Deposito berjangka	172,755,137	181,289,544	*Time deposits*
Giro	146,725,948	138,308,620	*Current accounts*
	566,747,065	541,964,794	
Mata uang asing			***Foreign currencies***
Giro	83,269,361	86,347,442	*Current accounts*
Deposito berjangka	32,495,184	20,300,546	*Time deposits*
Tabungan	10,165,427	9,449,411	*Savings accounts*
Negotiable Certificate of Deposits	-	587,760	*Negotiable Certificate of Deposits*
	125,929,972	116,685,159	
Total pihak ketiga	692,677,037	658,649,953	*Total third parties*
	805,510,848	**810,730,343**	

c. Deposito berjangka berdasarkan jangka waktu kontrak / *c. Time deposits by contractual period*

	2024	2023	
<1 bulan	14,835,885	11,607,194	*<1 month*
1 - <3 bulan	64,523,187	56,575,988	*1 - <3 months*
3 - <6 bulan	78,146,147	71,419,166	*3 - <6 months*
6 - 12 bulan	44,610,394	17,281,374	*6 - 12 months*
>12 bulan	40,117,354	75,781,258	*>12 months*
	242,232,967	**232,664,980**	

d. Simpanan yang diblokir dan dijadikan jaminan / *d. Deposits blocked and pledged as collateral*

	2024	2023	
Tabungan	28,835,871	14,832,482	*Savings accounts*
Giro	16,367,424	16,170,794	*Current accounts*
Deposito berjangka	13,255,678	7,253,007	*Time deposits*
Total	**58,458,973**	**38,256,283**	***Total***

22. SIMPANAN NASABAH (lanjutan) / *22. DEPOSITS FROM CUSTOMERS (continued)*

e. Tingkat suku bunga dan bagi hasil per tahun / *e. Annual interest rates and profit sharing*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Dolar Singapura/ Singapore Dollar %	Euro Eropa/ European Euro %	Yen Jepang/ *Japanese Yen* %	Won Korea Selatan/ *South Korea Won* %	Pound Sterling Inggris/ Great Britain *Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	
2024	0.00 - 8.10	0.00 - 6.25	0.00 - 2.25	0.00 - 0.10	0.00 - 0.07	0.00 - 0.25	0.00 - 0.10	0.00 - 3.70	*2024*
2023	0.00 - 7.50	0.00 - 6.90	0.00 - 1.75	0.00 - 0.10	0.00 - 0.01	-	-	-	*2023*

23. SIMPANAN DARI BANK LAIN / *23. DEPOSITS FROM OTHER BANKS*

Informasi mengenai simpanan berdasarkan pihak yang berelasi diungkapkan pada Catatan 45l.

Information with respect to transactions with related parties are disclosed in Note 45l.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2024	2023	
Rupiah			***Rupiah***
Pinjaman pasar uang antar bank	5,700,000	625,000	*Interbank money market*
Giro	1,481,005	1,320,942	*Current accounts*
Deposito berjangka	101,541	63,730	*Time deposits*
Simpanan lainnya	660,371	648,514	*Other deposits*
	7,942,917	2,658,186	
Mata uang asing			***Foreign currencies***
Pinjaman pasar uang antar bank	6,594,527	4,492,755	*Interbank money market*
Giro	2,244,398	3,055,587	*Current accounts*
Deposito berjangka	729,526	740,384	*Time deposits*
Negotiable Certificate of Deposit	770,760	515,651	*Negotiable Certificate of Deposits*
Simpanan lainnya	266,336	431,425	*Other deposits*
	10,605,547	9,235,802	
	18,548,464	**11,893,988**	

Perincian simpanan dari bank lain berdasarkan mata uang adalah sebagai berikut:

Deposits from other banks based on currencies are as follows:

	2024	2023	
Rupiah	7,942,917	2,658,186	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	7,538,687	5,286,458	*United States Dollar*
Yen Jepang	2,700,683	3,273,087	*Japanese Yen*
Dolar Singapura	243,814	566,429	*Singapore Dollar*
Euro Eropa	79,960	66,188	*European Euro*
Dolar Hong Kong	31,027	27,217	*Hong Kong Dollar*
Pound Sterling Inggris	11,376	16,423	*Great Britain Pound Sterling*
	10,605,547	9,235,802	
	18,548,464	**11,893,988**	

23. SIMPANAN DARI BANK LAIN (lanjutan) / *23. DEPOSITS FROM OTHER BANKS (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Interbank call money	1,000,000	-	*Interbank call money*
Giro	22,561	14,351	*Current accounts*
	1,022,561	14,351	
Mata uang asing			***Foreign currencies***
Pinjaman pasar uang antar bank	2,253,300	1,231,760	*Interbank money market*
Giro	888,836	1,327,918	*Current accounts*
Simpanan lainnya	-	131,078	*Other deposits*
	3,142,136	2,690,756	
Total pihak berelasi	4,164,697	2,705,107	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Pinjaman pasar uang antar bank	4,700,000	625,000	*Interbank money market*
Giro	1,458,444	1,306,591	*Current accounts*
Deposito berjangka	101,541	63,730	*Time deposits*
Simpanan lainnya	660,371	648,514	*Other deposits*
	6,920,356	2,643,835	
Mata uang asing			***Foreign currencies***
Pinjaman pasar uang antar bank	4,341,227	3,260,995	*Interbank money market*
Giro	1,355,562	1,727,669	*Current accounts*
Deposito berjangka	729,526	740,384	*Time deposits*
Negotiable Certificate of Deposit	770,760	515,651	*Negotiable Certificate of Deposit*
Simpanan lainnya	266,336	300,347	*Other deposits*
	7,463,411	6,545,046	
Total pihak ketiga	14,383,767	9,188,881	*Total third parties*
	18,548,464	**11,893,988**	

23. SIMPANAN DARI BANK LAIN (lanjutan) / *23. DEPOSITS FROM OTHER BANKS (continued)*

c. Berdasarkan tingkat suku bunga dan bagi hasil per tahun / *c. By annual interest rates and profit sharing*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	
2024	0.00 - 6.90	0.00 - 5.14	-	0.00 - 0.77	0.00 - 3.28	-	-	-	*2024*
2023	0.00 - 6.70	0.00 - 6.05	-	0.00 - 0.45	0.00 - 4.20	-	-	-	*2023*

d. Simpanan yang diblokir dan dijadikan jaminan / *d. Deposits blocked and pledged as collateral*

	2024	2023	
Giro	202,814	42,553	*Current accounts*
Tabungan	15,793	3,501	*Savings accounts*
Deposito berjangka	281	4,707	*Time deposits*
	218,888	**50,761**	

24. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI / *24. SECURITIES SOLD UNDER AGREEMENTS TO REPURCHASE*

Pihak lawan/ *Counterparty*	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Pembelian Kembali/ *Repurchase Amount*	Beban Bunga yang Belum Diamortisasi/ *Unamortised Interest Expenses*	Nilai Bersih/ *Net Value*
		2024					
Rupiah/*Rupiah*							
Bank Indonesia	OBN	4,000,000	30/12/2024	06/01/2025	3,907,625	3,388	3,904,237
Bank Indonesia	OBN	1,000,000	30/12/2024	13/01/2025	945,292	2,012	943,280
Bank Indonesia	OBN	750,000	09/12/2024	06/01/2025	714,435	642	713,793
Bank Indonesia	OBN	650,000	23/12/2024	06/01/2025	630,221	559	629,662
Bank Indonesia	OBN	580,000	17/12/2024	14/01/2025	553,006	1,291	551,715
Bank Indonesia	OBN	500,000	04/12/2024	02/01/2025	483,766	87	483,679
Bank Indonesia	OBN	500,000	05/12/2024	02/01/2025	470,023	84	469,939
Bank Indonesia	OBN	500,000	19/12/2024	02/01/2025	498,191	88	498,103
Bank Indonesia	OBN	450,000	12/12/2024	09/01/2025	427,339	614	426,725
Bank Indonesia	OBN	400,000	10/12/2024	07/01/2025	386,850	417	386,433
Bank Indonesia	OBN	350,000	23/12/2024	20/01/2025	340,265	1,161	339,104
Bank Artha Graha	OBN	200,000	25/11/2024	30/01/2025	193,351	1,034	192,317
JP Morgan Chase Bank	OBN	100,000	03/12/2024	03/01/2025	93,392	33	93,359
Bank Indonesia	OBN	5,000	11/12/2024	08/01/2025	5,078	7	5,071
		9,985,000			**9,648,834**	**11,417**	**9,637,417**
Mata uang asing/*Foreign currencies*							
JP Morgan Chase Bank	OBN	1,219,000	13/04/2023	15/09/2026	1,311,697	159,890	1,151,807
JP Morgan Chase Bank	OBN	1,070,000	12/04/2023	15/05/2027	1,162,333	179,543	982,790
Deutsche Bank AG.	OBN	1,001,000	12/04/2023	15/05/2027	1,155,548	179,663	975,885
Standard Chartered Bank	OBN	1,000,000	12/04/2023	15/05/2027	1,180,802	183,412	997,390
Standard Chartered Bank	OBN	700,000	14/04/2023	15/04/2026	762,718	88,896	673,822
Deutsche Bank AG.	OBN	700,000	14/04/2023	15/04/2026	744,800	85,930	658,870
JP Morgan Chase Bank	OBN	777,389	16/11/2023	16/11/2028	751,317	183,169	568,148
JP Morgan Chase Bank	OBN	317,071	16/11/2023	17/04/2028	312,614	67,798	244,816
		6,784,460			**7,381,829**	**1,128,301**	**6,253,528**
		16,769,460			**17,030,663**	**1,139,718**	**15,890,945**

24. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI (lanjutan)

24. SECURITIES SOLD UNDER AGREEMENTS TO REPURCHASE (continued)

Pihak lawan/ *Counterparty*	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Pembelian Kembali/ *Repurchase Amount*	Beban Bunga yang Belum Diamortisasi/ *Unamortised Interest Expenses*	Nilai Bersih/ *Net Value*
			2023				
Rupiah/*Rupiah*							
BPD Kalimantan Timur	OBN	200,000	15/12/2023	15/1/2024	199,901	587	199,314
		200,000			**199,901**	**587**	**199,314**
Mata uang asing/*Foreign currencies*							
JP Morgan Chase Bank	OBN	1,219,000	13/4/2023	15/9/2026	1,254,812	156,592	1,098,220
Standard Chartered, Jakarta	OBN	1,000,000	12/4/2023	15/5/2027	1,129,594	176,903	952,691
JP Morgan Chase Bank	OBN	1,070,000	12/4/2023	15/5/2027	1,111,926	174,026	937,900
Deutsche Bank AG.	OBN	1,001,000	12/4/2023	15/5/2027	1,105,434	173,235	932,199
Standard Chartered, Jakarta	OBN	700,000	14/4/2023	15/4/2026	729,641	85,943	643,698
Deutsche Bank AG.	OBN	700,000	14/4/2023	15/4/2026	712,500	83,084	629,416
JP Morgan Chase Bank	OBN	743,675	16/11/2023	16/11/2028	718,734	175,394	543,340
JP Morgan Chase Bank	OBN	523,618	17/9/2021	15/5/2024	525,917	16,990	508,927
JP Morgan Chase Bank	OBN	303,321	16/11/2023	17/4/2028	299,056	66,190	232,866
BNP Paribas	OBN	230,955	12/10/2023	17/1/2024	215,775	3,169	212,606
		7,491,569			**7,803,389**	**1,111,526**	**6,691,863**
		7,691,569			**8,003,290**	**1,112,113**	**6,891,177**

Tingkat suku bunga tetap tahunan: *Annual fixed interest rates:*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Suku bunga kontrak:			*Contractual interest rate:*
2024	5.50 - 8.38	1.85 - 4.75	*2024*
2023	6.65	1.30 - 6.32	*2023*

25. LIABILITAS AKSEPTASI

25. ACCEPTANCE PAYABLES

a. Berdasarkan pihak dan mata uang

a. By party and currency

	2024	2023	
Rupiah			***Rupiah***
Bank	1,416,042	1,519,809	*Banks*
Kreditur non-bank	201,263	244,375	*Non-bank creditors*
	1,617,305	1,764,184	
Mata uang asing			***Foreign currencies***
Bank	2,470,305	3,939,319	*Banks*
Kreditur non-bank	141,874	45,044	*Non-bank creditors*
	2,612,179	3,984,363	
	4,229,484	**5,748,547**	

25. LIABILITAS AKSEPTASI (lanjutan) / *ACCEPTANCE PAYABLES (continued)*

Perincian liabilitas akseptasi berdasarkan mata uang adalah sebagai berikut:

Acceptance payables based on currencies are as follows:

a. Berdasarkan pihak dan mata uang (lanjutan) / *By party and currency (continued)*

	2024	2023	
Rupiah	1,617,305	1,764,184	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	2,534,029	3,897,148	*United States Dollar*
Euro Eropa	32,271	66,367	*European Euro*
Yuan China	29,132	15,221	*Chinese Yuan*
Yen Jepang	16,747	5,627	*Japanese Yen*
	2,612,179	3,984,363	
	4,229,484	**5,748,547**	

b. Berdasarkan hubungan / *By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	850,673	1,049,883	*Rupiah*
Mata uang asing	50,082	20,717	*Foreign currencies*
Total pihak berelasi	900,755	1,070,600	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	766,632	714,301	*Rupiah*
Mata uang asing	2,562,097	3,963,646	*Foreign currencies*
Total pihak ketiga	3,328,729	4,677,947	*Total third parties*
	4,229,484	**5,748,547**	

26. BEBAN YANG MASIH HARUS DIBAYAR / *ACCRUED EXPENSES*

Beban yang masih harus dibayar terdiri dari:

Accrued expenses consist of the following:

	2024	2023	
Biaya teknologi dan telekomunikasi	615,258	558,506	*Technology and telecommunication expenses*
Biaya kantor	412,947	467,642	*Office expenses*
Kewajiban sebagai Bank penerbit	245,037	460,742	*Issuer Bank liabilities*
Biaya *loyalty*	48,929	49,905	*Loyalty expenses*
Biaya promosi	5,418	5,288	*Sales promotion expenses*
Lain-lain	201,716	121,782	*Others*
	1,529,305	**1,663,865**	

27. PENYISIHAN / *PROVISIONS*

	2024	2023	
Estimasi kerugian atas komitmen dan kontinjensi	2,273,422	2,165,058	*Estimated losses from commitments and contingencies*
Penyisihan atas perkara hukum dan lainnya	9,800	7,674	*Provision for legal cases and others*
	2,283,222	**2,172,732**	

27. PENYISIHAN (lanjutan)

a. Perubahan cadangan atas perkara hukum adalah sebagai berikut:

	2024	2023	
Saldo awal	7,674	14,674	*Beginning balance*
Penambahan/(pembalikan) selama tahun berjalan	2,126	(7,000)	*Addition/(reversal) during the year*
	9,800	**7,674**	

Bank saat ini masih menghadapi permasalahan hukum diantaranya dengan debitur, pemilik dana dan/atau pihak ketiga. Saat ini permasalahan hukum tersebut masih dalam proses/upaya hukum.

Jumlah klaim terhadap Bank dan estimasi biaya penyelesaian perkara atas tuntutan hukum yang belum selesai pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar Rp9.800 dan Rp7.660. Pada tanggal 31 Desember 2024 dan 2023, Manajemen berpendapat bahwa jumlah cadangan atas perkara hukum telah memadai.

b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut:

27. *PROVISIONS* *(continued)*

a. The movements of the allowance for legal cases are as follows:

The Bank has a number of outstanding litigation cases, including lawsuits with debtors, fund owners and/or third parties. Currently, litigation cases are still in legal process.

The Bank's total potential financial exposure and estimation on settlement of legal cases arising from outstanding lawsuits as of 31 December 2024 and 2023 amounted to Rp9,800 and Rp7,660, respectively. As of 31 December 2024 and 31 December 2023, Management believes that the provision for legal cases is adequate.

b. The movements of gross carrying amount on commitments and contingencies are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	59,283,219	6,952,682	541,230	66,777,131	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(4,414,085)	4,414,085	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya kredit tidak memburuk	5,587,210	(5,587,210)	-	-	*Lifetime ECL not credit --impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(17,941)	17,941	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	(17,975,199)	(5,043,341)	(16,566,920)	(39,585,460)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	37,901,557	3,505,203	28,410,920	69,817,680	*New financial assets originated or purchased*
Pembayaran penuh	(12,452,274)	(361,736)	(11,458,070)	(24,272,080)	*Full repayment*
Valuta asing dan perubahan lain	1,244,187	89,919	(620,397)	713,709	*Foreign exchange and other movements*
	69,174,615	**3,951,661**	**324,704**	**73,450,980**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net measurement is repayment *)*

27. PENYISIHAN (lanjutan)

***27. PROVISIONS** (continued)*

b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

b. The movements of gross carrying amount on commitments and contingencies are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	56,655,579	5,676,476	776,913	63,108,968	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(3,852,868)	3,852,868	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya kredit tidak memburuk	1,746,822	(1,746,822)	-	-	*Lifetime ECL not credit - -impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	575	(3,240)	2,665	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	(21,893,089)	(4,330,468)	(2,172,751)	(28,396,308)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	40,524,918	4,016,438	1,966,140	46,507,496	*New financial assets originated or purchased*
Pembayaran penuh	(13,737,880)	(491,034)	(28,139)	(14,257,053)	*Full repayment*
Valuta asing dan perubahan lain	(160,838)	(21,536)	(3,598)	(185,972)	*Foreign exchange and other movements*
	59,283,219	**6,952,682**	**541,230**	**66,777,131**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net measurement is repayment *)*

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	16,294,584	433,303	126,420	16,854,307	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,363,458)	1,363,458	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	1,174,065	(1,174,065)	-	-	*Lifetime ECL not credit - -impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	28,312	(28,312)	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	14,256,127	(156,026)	23,036	14,123,137	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	10,906,658	1,074,960	10,233	11,991,851	*New financial assets originated or purchased*
Pembayaran penuh	(33,053,635)	(488,382)	(109,206)	(33,651,223)	*Full repayment*
Valuta asing dan perubahan lain	636,286	(2,385)	687	634,588	*Foreign exchange and other movements*
	8,850,627	**1,079,175**	**22,858**	**9,952,660**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net measurement is repayment *)*

27. PENYISIHAN (lanjutan) / ***27. PROVISIONS*** *(continued)*

b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

b. The movements of gross carrying amount on commitments and contingencies are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	15,180,092	585,899	308,204	16,074,195	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(594,357)	594,357	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	192,452	(192,452)	-	-	*Lifetime ECL not credit – -impaired*
Pengukuran kembali bersih*)	15,422,555	(283,956)	(62,969)	15,075,630	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	14,013,076	343,458	218,181	14,574,715	*New financial assets originated or purchased*
Pembayaran penuh	(27,822,922)	(606,614)	(341,470)	(28,771,006)	*Full repayment*
Valuta asing dan perubahan lain	(96,312)	(7,389)	4,474	(99,227)	*Foreign exchange and other movements*
	16,294,584	**433,303**	**126,420**	**16,854,307**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net measurement is repayment *)*

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut:

c. The movements of estimated losses on commitments and contingencies are as follows:

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	137,524	1,115,637	507,945	1,761,106	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(2,699)	2,699	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	53,232	(53,232)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(2,444)	2,444	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	374,867	(705,566)	(1,192,635)	(1,523,334)	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	91,537	721,691	1,099,196	1,912,424	*New financial assets originated or purchased*
Pembayaran penuh	(6,196)	(274,145)	-	(280,341)	*Full repayment*
Valuta asing dan perubahan lain	4,648	10,770	3,401	18,819	*Foreign exchange and other movements*
	652,913	**815,410**	**420,351**	**1,888,674**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

27. PENYISIHAN (lanjutan) / ***27. PROVISIONS** (continued)*

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan) / *c. The movements of estimated losses on commitments and contingencies are as follows: (continued)*

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	89,860	1,081,127	771,395	1,942,382	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(4,467)	4,467	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	83,395	(83,395)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	341	(868)	527	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	(90,938)	(590,929)	(2,029,163)	(2,711,030)	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	80,926	886,710	1,768,132	2,735,768	*New financial assets originated or purchased*
Pembayaran penuh	(19,564)	(177,870)	-	(197,434)	*Full repayment*
Valuta asing dan perubahan lain	(2,029)	(3,605)	(2,946)	(8,580)	*Foreign exchange and other movements*
	137,524	**1,115,637**	**507,945**	**1,761,106**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

	2024				
	Kerugian kredit ekspektasian 12 bulan/ *12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	13,060	52,806	699	66,565	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,466)	1,466	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	2,474	(2,474)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	(12,472)	12,472	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	11,871	18,094	(47,633)	(17,668)	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	12,957	155,799	2,502	171,258	*New financial assets originated or purchased*
Pembayaran penuh	(29,289)	(126,797)	31,606	(124,480)	*Full repayment*
Valuta asing dan perubahan lain	586	330	354	1,270	*Foreign exchange and other movements*
	10,193	**86,752**	**-**	**96,945**	

27. PENYISIHAN (lanjutan)

***27. PROVISIONS** (continued)*

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/ *12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	30,261	69,624	308,036	407,921	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,751)	1,751	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	1,724	(1,724)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	-	-	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	56,746	(29,209)	(323,022)	(295,485)	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	22,314	118,171	68,193	208,678	*New financial assets originated or purchased*
Pembayaran penuh	(96,766)	(103,971)	(43,021)	(243,758)	*Full repayment*
Valuta asing dan perubahan lain	532	(1,836)	(9,487)	(10,791)	*Foreign exchange and other movements*
	13,060	**52,806**	**699**	**66,565**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Fasilitas kredit kepada nasabah yang belum ditarik					***Unused loan facilities to debtors***
Saldo awal	337,325	62	-	337,387	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(10,963)	10,963	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	3,316	(3,316)	-	-	*Lifetime ECL not credit - impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	(168)	-	168	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	(280,039)	(8,216)	-	(288,255)	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	38,081	176	-	38,257	*New financial assets originated or purchased*
Pembayaran penuh	199,213	331	(168)	199,376	*Full repayment*
Penghapusbukuan	(271)	-	-	(271)	*Write-offs*
Valuta asing dan perubahan lain	1,309	-	-	1,309	*Foreign exchange and other movements*
	287,803	**-**	**-**	**287,803**	

27. PENYISIHAN (lanjutan)

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

***27. PROVISIONS** (continued)*

c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

	2023				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Fasilitas kredit kepada nasabah yang belum ditarik					***Unused loan facilities to debtors***
Saldo awal	347,373	-	-	347,373	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(27,489)	27,489	-	-	*12-month ECL-*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	(1,817)	-	1,817	-	*Transfer from/to lifetime Lifetime ECL credit-impaired -*
Pengukuran kembali bersih penyisihan kerugian*)	(454,075)	(7,853)	(1,817)	(463,745)	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	63,636	-	-	63,636	*New financial assets originated or purchased*
Pembayaran penuh	390,823	25	-	390,848	*Full repayment*
Penghapusbukuan	(671)	-	-	(671)	*Write-offs*
Valuta asing dan perubahan lain	(55)	1	-	(54)	*Foreign exchange and other movements*
	337,325	**62**	**-**	**337,387**	

Manajemen berpendapat bahwa estimasi kerugian pada komitmen dan kontinjensi di atas telah memadai.

Management believes that the estimated losses on commitments and contingencies are adequate.

28. LIABILITAS LAIN-LAIN

28. OTHER LIABILITIES

	2024	**2023**	
Liabilitas ke pemegang polis	18,446,596	17,010,970	*Liabilities to policyholders*
Utang bunga	1,216,660	1,145,545	*Interest payable*
Liabilitas sewa	1,004,213	1,287,369	*Lease liabilities*
Term Deposit Valas Devisa Hasil Ekspor	909,368	2,540,505	*Foreign Exchange Term Deposit from Export Activities*
Setoran jaminan	715,473	509,379	*Guarantee deposits*
Pendapatan yang belum diakui*)	582,568	436,658	*Unearned income*)*
Utang nasabah - Entitas anak	204,901	753,482	*Payable to customers - Subsidiary*
Rekening dalam penyelesaian	201,120	194,275	*Unsettled account*
Kewajiban pada pihak ketiga	120,182	225,555	*Liability to third parties*
Utang reasuransi dan komisi	73,892	44,073	*Reinsurance payable and commission*
Lain-lain	3,088,528	1,977,086	*Others*
	26,563,501	**26,124,897**	

*) Termasuk di dalam pendapatan yang belum diakui adalah klaim asuransi yang telah diterima oleh Bank atas Kredit Usaha Rakyat (KUR).

*) *Including in unearned income is insurance claim that has been received by the Bank from Kredit Usaha Rakyat (KUR).*

28. LIABILITAS LAIN-LAIN (lanjutan)

Term Deposit Valas Devisa Hasil Ekspor merupakan suatu instrumen dimana dana devisa hasil ekspor dari rekening khusus eksportir ditempatkan pada Bank Indonesia melalui rekening Bank sesuai mekanisme pasar.

Liabilitas ke pemegang polis

Liabilitas kepada pemegang polis terdiri dari liabilitas manfaat polis masa depan, liabilitas kepada pemegang *unit link*, estimasi liabilitas klaim (termasuk klaim yang sudah terjadi namun belum dilaporkan ("IBNR")) dan cadangan atas premi yang belum merupakan pendapatan.

Rincian jumlah utang kepada pemegang polis adalah sebagai berikut:

	2024	2023	
Utang klaim	8,256	1,533	*Obligation to policyholders*
Cadangan atas premi yang belum mendapatkan pendapatan	106,425	134,610	*Unearned premium reserves estimated claim liabilities*
Estimasi liabilitas klaim	210,196	259,964	*Estimated claim liabilities*
Liabilitas manfaat polis masa depan	11,381,692	10,176,551	*Liabilities for future policy benefits*
Penyisihan manfaat polis masa depan dan kontribusi yang belum menjadi hak	144,248	135,181	*Provision for liabilities for future policy benefits and unearned contributions*
Liabilitas kepada pemegang unit link	6,572,395	6,282,559	*Liabilities to unit linked holders*
Ujrah diterima dimuka	23,384	20,572	*Unearned Ujrah*
	18,446,596	**17,010,970**	

Grup mengakui liabilitas manfaat polis masa depan, penyisihan kontribusi yang belum menjadi hak, estimasi liabilitas klaim dan premi yang belum merupakan pendapatan berdasarkan perhitungan internal aktuaris pada tanggal 31 Desember 2024 dan 2023.

a. Liabilitas manfaat polis masa depan

Liabilitas manfaat polis masa depan merupakan total dana yang disediakan untuk seluruh kewajiban yang timbul dari persyaratan yang tertera pada polis-polis yang masih berlaku pada tanggal laporan posisi keuangan. Perhitungan liabilitas manfaat polis masa depan menggunakan asumsi-asumsi aktuaria sebagai berikut:

28. *OTHER LIABILITIES* *(continued)*

Term Deposits of Foreign Exchange from Export Proceeds is an instrument where foreign exchange from export proceeds from exporters' special account are placed in Bank Indonesia through Bank's accounts in accordance with market mechanisms.

Liabilities to policyholders

Liabilities to policyholders represent liabilities for future policy benefits, liabilities to unit-linked holders, estimated claim liabilities (including claims incurred but not yet reported ("IBNR")) and unearned premium reserves.

Details of obligation to policyholders represent liabilities are as follows:

The Group recognised liabilities for future policy benefits, unearned contributions provisions, estimated claim liabilities and unearned premiums as of 31 December 2024 and 2023, based on internal actuary's calculations.

a. Liabilities for future policy benefits

Liabilities for future policy benefits represents amount provided for all obligations arising from the terms of the policies in force at the statement of financial position. The computation of liabilities for future policy benefits is based on the following actuarial assumptions:

28. LIABILITAS LAIN-LAIN (lanjutan)

28. *OTHER LIABILITIES* *(continued)*

Liabilitas ke pemegang polis (lanjutan)

Liabilities to policyholders (continued)

a. Liabilitas manfaat polis masa depan (lanjutan)

a. *Liabilities for future policy benefits (continued)*

	2024	2023	
Metode aktuaria	*Gross Premium Valuation and Fund Value*	*Gross Premium Valuation and Fund Value*	*Actuarial methods*
Tabel mortalitas	TMI IV (2019)	TMI IV (2019)	*Mortality tables*
Tabel morbiditas	*Munich Re basis Hospitalisation (Health Insurance & Cash Plan)*	*Munich Re basis Hospitalisation (Health Insurance & Cash Plan)*	*Morbidity tables*
Suku bunga tahunan			*Annual interest rate*
Rupiah	6.87% - 7.49%	6.54% - 7.45%	*Rupiah*
Dolar Amerika Serikat	5.34% - 5.86%	5.40% - 5.86%	*US Dollar*

Asumsi lain yang digunakan dalam perhitungan liabilitas manfaat polis masa depan adalah tingkat *lapse*, inflasi dan asumsi biaya.

Other assumptions used in the calculation of liabilities for future policy benefits include lapse rate, inflation and expense assumption.

Perhitungan liabilitas manfaat polis masa depan dan cadangan atas premi yang belum merupakan pendapatan pada tanggal 31 Desember 2024 dan 2023 telah diperiksa oleh aktuaris Grup.

The calculation of the liability for future policy benefits and unearned premium reserves as of 31 December 2024 and 2023 were reviewed by the Group's actuary.

Rincian liabilitas manfaat polis masa depan adalah sebagai berikut:

Details of liabilities for future policy benefits are as follows:

	2024	2023	
Asuransi jiwa			***Life insurance***
Perorangan	10,482,014	9,186,453	*Individual*
Kumpulan	899,678	990,098	*Group*
	11,381,692	10,176,551	
Unit Link			***Unit Link***
Perorangan	1,631,586	2,113,937	*Individual*
Kumpulan	4,940,809	4,168,622	*Group*
	6,572,395	6,282,559	
Syariah			***Sharia***
Perorangan	133,835	124,419	*Individual*
Kumpulan	14	17	*Group*
	133,849	124,436	
	18,087,936	16,583,546	

28. LIABILITAS LAIN-LAIN (lanjutan)

Liabilitas ke pemegang polis (lanjutan)

a. Liabilitas manfaat polis masa depan (lanjutan)

Termasuk dalam liabilitas manfaat polis masa depan adalah saldo dalam mata uang asing sebesar USD4.279.829 (nilai penuh) atau ekuivalen Rp69.171 (2023: USD5.084.024 (nilai penuh)).

b. Liabilitas manfaat polis masa depan dan kontribusi yang belum menjadi hak

Liabilitas manfaat polis masa depan merupakan total penyisihan untuk memenuhi risiko yang timbul pada periode mendatang. Perhitungan menggunakan asumsi-asumsi aktuaria sebagai berikut:

***28. OTHER LIABILITIES** (continued)*

Liabilities to policyholders (continued)

a. Liabilities for future policy benefits (continued)

Included in the above liabilities for future policy benefits are balances in foreign currencies amounting to USD4,279,829 (full amount) or equivalent Rp69,171 (2023: USD5,084,024 (full amount)).

b. Liabilities for future policy benefits and unearned contributions

Liabilities for future policy benefits represent reserves amount provided for such risks arising in future periods. The computation is based on the following actuarial assumptions:

	2024	2023	
Metode aktuaria	*GPV* hanya untuk dana tabarru'/ *only for tabarru' funds*	*GPV* hanya untuk dana tabarru'/ *only for tabarru' funds*	*Actuarial method*
Tabel mortalita	TMI III (2011) Rate reasuransi (Kecelakaan diri Grup, Ekawarsa) /*Reinsurance rate (Group personal accident, Yearly term life)*	TMI III (2011) Rate reasuransi (Kecelakaan diri Grup, Ekawarsa) /*Reinsurance rate (Group personal accident, Yearly term life)*	*Mortality tables*
Tabel morbidita	*Munich Re basis (Health Insurance)*	*Munich Re basis (Health Insurance)*	*Morbidity tables*
Tingkat bagi hasil tahunan hanya untuk dana tabarru' Rupiah	6.37% - 6.98%	6.04% - 6.92%	*Annual profit sharing rate only for tabarru' funds Rupiah*

Rincian penyisihan manfaat polis masa depan dan kontribusi yang belum menjadi hak adalah sebagai berikut:

Details of provision for future policy benefits and unearned contributions are as follows:

	2024	2023	
Syariah			***Sharia***
Penyisihan manfaat polis masa depan	133,849	124,436	*Provision for future policy benefit*
Kontribusi yang belum menjadi hak	10,399	10,745	*Unearned contributions*
	144,248	135,181	

28. LIABILITAS LAIN-LAIN (lanjutan)

Liabilitas ke pemegang polis (lanjutan)

c. Premi yang belum merupakan pendapatan

Premi yang belum merupakan pendapatan menurut jenis asuransi adalah sebagai berikut:

***28. OTHER LIABILITIES** (continued)*

Liabilities to policyholders (continued)

c. Unearned premium reserves

Unearned premium reserves by type of insurance are as follows:

	2024	2023	
Asuransi jiwa			***Life insurance***
Perorangan			*Individual*
Kecelakaan diri	18,471	20,584	*Personal accident*
Kesehatan	3,952	8,491	*Health*
Ekawarsa	3,541	2,712	*Term life*
Link	2,066	2,323	*Link*
	28,030	34,110	
Kumpulan			*Group*
Kesehatan	68,408	93,172	*Health*
Ekawarsa	8,584	4,919	*Term life*
Kecelakaan diri	1,255	2,294	*Personal accident*
Link	148	115	*Link*
	78,395	100,500	
	106,425	134,610	

d. Estimasi liabilitas klaim

Estimasi liabilitas klaim menurut jenis asuransi adalah sebagai berikut:

d. Estimated claim liabilities

Estimated claim liabilities by type of insurance are as follows:

	2024	2023	
Asuransi jiwa			***Life insurance***
Perorangan			*Individual*
Jangkawarsa	63,865	72,436	*Term life*
Kesehatan	18,576	13,670	*Health*
Kecelakaan diri	5,165	4,483	*Personal Accident*
Ekawarsa	5	514	*Term life*
Kumpulan			*Group*
Kesehatan	47,726	71,227	*Health*
Seumur hidup	50,543	75,023	*Life time*
	185,880	237,353	
Syariah			***Sharia***
Perorangan			*Individual*
Jangkawarsa	222	86	*Term life*
Kumpulan			*Group*
Asuransi jiwa kredit	16,415	15,587	*Credit life*
Kesehatan	6,740	5,863	*Health*
Kecelakaan diri	939	994	*Personal accident*
Ekawarsa	-	81	*Term life*
	24,316	22,611	
	210,196	259,964	

28. LIABILITAS LAIN-LAIN (lanjutan)

28. *OTHER LIABILITIES* *(continued)*

Liabilitas ke pemegang polis (lanjutan)

Liabilities to policyholders (continued)

e. Utang klaim

e. *Claim payables*

	2024	2023	
Asuransi jiwa			***Life insurance***
Kesehatan	3,886	703	*Health*
Kematian	40	396	*Death*
	3,926	1,099	
Syariah			***Sharia***
Kesehatan	4,330	434	*Health*
Kematian	-	-	*Death*
	4,330	434	
	8,256	1,533	

Tabel berikut menyajikan sensitivitas dari nilai liabilitas asuransi terhadap perubahan asumsi yang digunakan dalam estimasi liabilitas asuransi. Korelasi asumsi akan memiliki dampak yang signifikan dalam menentukan cadangan teknis, tetapi untuk menunjukkan dampak akibat perubahan asumsi, asumsi harus diubah secara individual. Tabel ini juga menunjukkan dampak terhadap cadangan teknis akibat perubahan asumsi aktuaria (tidak diaudit).

The following tables present the sensitivity of the value of insurance liabilities to the movements in the assumptions used in the estimation of insurance liabilities. The correlation of assumptions will have a significant effect in determining the ultimate technical reserves, but to demonstrate the impact due to changes in assumptions, assumptions had to be changed on an individual basis. This table also indicates the impact on the technical reserve due to the changes in the actuarial assumptions (unaudited).

	Persentase perubahan/ *Percentage of change*	Saldo liabilitas asuransi/ *Balance of insurance liabilities* 2024	2023	
Tingkat suku bunga	+1%	17,802,313	16,433,969	*Interest rate*
Tingkat suku bunga	-1%	18,761,626	17,287,845	*Interest rate*
Tingkat mortalitas	+10%	18,315,844	16,905,890	*Mortality rate*
Tingkat mortalitas	-10%	18,179,392	16,758,319	*Mortality rate*

Liabilitas lain-lain

Other liabilities

Jumlah beban bunga atas liabilitas sewa sebesar Rp52.631 pada tanggal 31 Desember 2024 dan Rp43.171 pada tanggal 31 Desember 2023.

The balances of interest expense from lease liabilities amounted to Rp52,631 as of 31 December 2024 and Rp43,171 as of 31 December 2023.

28. LIABILITAS LAIN-LAIN (lanjutan) / *28. OTHER LIABILITIES (continued)*

Liabilitas lain-lain (lanjutan) / *Other liabilities (continued)*

Analisis jatuh tempo liabilitas lain-lain terkait sewa adalah sebagai berikut: / *The maturity analysis of other liabilities related to lease is as follows:*

	2024	2023	
1 tahun	198,817	183,518	*1 year*
2 tahun	79,407	310,103	*2 years*
3 tahun	151,182	175,230	*3 years*
4 tahun	188,687	198,461	*4 years*
5 tahun	386,120	420,057	*5 years*
	1,004,213	**1,287,369**	

29. PERPAJAKAN / *29. TAXATION*

a. Pajak dibayar di muka / *a. Prepaid taxes*

	2024	2023	
Pajak penghasilan badan			*Corporate income tax*
BNI	-	626,869	*BNI*
Entitas Anak	18,950	16,515	*Subsidiaries*
	18,950	**643,384**	

b. Utang pajak / *b. Taxes payable*

	2024	2023	
Pajak penghasilan badan			*Corporate income tax*
BNI			*BNI*
Pasal 25	200,180	110,481	*Article 25*
Pasal 29	2,419	569,188	*Article 29*
	202,599	679,669	
Entitas Anak			*Subsidiaries*
Pasal 25	4,926	408	*Article 25*
Pasal 29	15,683	21,843	*Article 29*
Total pajak penghasilan badan	223,208	701,920	*Total corporate income tax*
Pajak lainnya			*Other taxes*
BNI	84,312	101,409	*BNI*
Entitas Anak	10,049	19,644	*Subsidiaries*
Total pajak lainnya	94,361	121,053	*Total other taxes*
	317,569	**822,973**	

29. PERPAJAKAN (lanjutan) / ***29. TAXATION*** *(continued)*

c. Beban pajak / ***c. Tax expense***

	2024	2023	
BNI			*BNI*
Kini	4,133,787	4,386,618	*Current*
Tangguhan	410,731	84,783	*Deferred*
Periode lalu dari hasil pemeriksaan pajak	313,924	-	*Previous year tax examination*
Pajak penghasilan - BNI	4,858,442	4,471,401	*Income tax - BNI*
Entitas Anak			*Subsidiaries*
Kini	47,820	75,434	*Current*
Tangguhan	4,799	(13,325)	*Deferred*
Pajak penghasilan - Entitas Anak	52,619	62,109	*Income tax - Subsidiaries*
	4,911,061	**4,533,510**	

Rekonsiliasi antara beban pajak penghasilan dengan hasil perkalian laba akuntansi sebelum pajak penghasilan dan tarif pajak yang berlaku adalah sebagai berikut:

The reconciliation between income tax expense and the theoretical tax amount on the profit before income tax is as follows:

	2024	2023	
Laba konsolidasian sebelum pajak penghasilan	26,580,458	25,639,738	*Consolidated income before income tax*
Pajak dihitung dengan tarif pajak yang berlaku	5,065,757	4,883,074	*Tax calculated at applicable tax rates*
Pendapatan yang tidak dapat dikurangkan untuk tujuan perpajakan			*Income not deductible for tax purpose*
BNI	(477,139)	(327,163)	*BNI*
Entitas Anak	8,519	(22,401)	*Subsidiaries*
Total dampak pajak penghasilan	(468,620)	(349,564)	*Total income tax impact*
Koreksi hasil pemeriksaan pajak penghasilan tahun sebelumnya – BNI	313,924	-	*Correction of income tax assessment on previous year - BNI*
Beban pajak	**4,911,061**	**4,533,510**	***Tax expense***

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laba rugi BNI dengan estimasi penghasilan kena pajak adalah sebagai berikut:

A reconciliation between the income before tax as shown in BNI's profit and loss and estimated taxable income is as follows:

	2024	2023	
Grup			***The Group***
Laba konsolidasian sebelum pajak penghasilan	26,580,458	25,639,738	*Consolidated income before income tax*
Laba sebelum pajak penghasilan dari Entitas Anak, setelah eliminasi	(515,679)	(384,139)	*Income before income tax of Subsidiaries, after elimination*
Laba sebelum pajak penghasilan - BNI	26,064,779	25,255,599	*Income before income tax - BNI*

29. PERPAJAKAN (lanjutan) / ***29. TAXATION*** *(continued)*

c. Beban pajak (lanjutan) / ***c. Tax expense*** *(continued)*

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laba rugi BNI dengan estimasi penghasilan kena pajak adalah sebagai berikut: (lanjutan)

A reconciliation between the income before tax as shown in BNI's profit and loss and estimated taxable income is as follows: (continued)

	2024	2023	
Beda waktu			*Timing differences*
- Penyusutan aset tetap	218,674	129,640	*Depreciation of fixed assets* -
- (Pembalikan)/pembentukan cadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	(1,099,931)	284,088	*(Reversal)/addition provision for impairment losses on earning assets - loans* -
- Pembentukan cadangan hukum, litigasi dan lainnya	2,126	(7,000)	*Provision for legal, litigation and others* -
- Laba yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(179,124)	(334,840)	*Unrealised gain on trading securities and derivative transactions* -
- Pembentukan cadangan imbalan kerja	(37,058)	218,287	*Provision for allowance for employee benefits* -
- Amortisasi aset atas hak-guna	52,846	28,857	*Right-of-use of asset amortization* -
- Pembalikan cadangan kerugian penurunan nilai aset produktif selain pinjaman yang diberikan	(729,649)	(719,889)	*Reversal provision for impairment earning assets - other than loans* -
- Modifikasi arus kas kontraktual pinjaman yang diberikan	(24,629)	(45,370)	*Modification of contractual loans* -
	(1,796,745)	(446,227)	
Beda tetap			*Permanent differences*
- Kenikmatan karyawan	268,608	288,574	*Employees' fringe benefits* -
- Keuntungan atas reksadana	(917,424)	(797,876)	*Gain on mutual funds* -
- Laba dari cabang luar negeri	(881,681)	(515,555)	*Profit from overseas branch offices* -
- Lain-lain	(980,761)	(697,053)	*Others* -
	(2,511,258)	(1,721,910)	
Penghasilan kena pajak - BNI	21,756,776	23,087,462	*Taxable income - BNI*

Beban pajak penghasilan periode berjalan dan taksiran utang pajak penghasilan BNI adalah sebagai berikut:

Taxable income for the current period and the estimated corporate income tax payable of BNI are as follows:

	2024	2023	
Beban pajak penghasilan sesuai tarif pajak yang berlaku			*Income tax based on the applicable tax rates*
19% x Rp21.756.776	4,133,787	-	*19% x Rp21,756,776*
19% x Rp23.087.462	-	4,386,618	*19% x Rp23,087,462*
Beban pajak penghasilan	4,133,787	4,386,618	*Corporate income tax expense*
Pajak dibayar di muka	(3,931,188)	(3,706,949)	*Prepaid tax*
Utang pajak penghasilan - BNI	202,599	679,669	*Corporate income tax payable - BNI*

29. PERPAJAKAN (lanjutan)

c. Beban pajak (lanjutan)

Untuk tahun pajak 2024 dan 2023, berdasarkan Pasal 65 dari Peraturan Pemerintah No. 55 tahun 2022 tentang Penyesuaian Pengaturan Di Bidang Pajak Penghasilan bagi Wajib Pajak Badan Dalam Negeri Yang Berbentuk Perseroan Terbuka, Wajib Pajak dapat memperoleh penurunan tarif PPh sebesar 3% (tiga persen) lebih rendah dari tarif PPh Wajib Pajak Badan dalam negeri sebagaimana diatur dalam Undang-undang Perpajakan tersebut diatas apabila memenuhi tambahan kriteria sebagai berikut:

1. Jumlah kepemilikan saham publiknya 40% (empat puluh persen) atau lebih dari keseluruhan saham yang disetor dan saham tersebut dimiliki paling sedikit oleh 300 (tiga ratus) pihak.
2. Masing-masing pihak yang dimaksud di atas hanya boleh memiliki saham kurang dari 5% (lima persen) dari keseluruhan saham yang disetor.
3. Ketentuan tersebut harus dipenuhi oleh Wajib Pajak dalam waktu paling singkat 6 (enam) bulan (183 (seratus delapan puluh tiga) hari kalender) dalam jangka waktu 1 (satu) tahun pajak.
4. Pihak-pihak yang memenuhi persyaratan 300 (tiga ratus) pihak dan 5% (lima persen) sebagaimana di atas, tidak termasuk: Wajib Pajak Perseroan Terbuka yang membeli kembali sahamnya; dan/atau yang memiliki hubungan istimewa sebagaimana diatur dalam Undang-Undang Pajak Penghasilan dengan Wajib Pajak Perseroan Terbuka (tercermin dari kepemilikan saham oleh pengendali dan/atau pemegang saham utama).

Berdasarkan Laporan Bulanan Kepemilikan Saham Nomor DE/I/2025-0034 tanggal 3 Januari 2025 dan Nomor DE/I/2024-0032 tanggal 3 Januari 2024 dari Biro Administrasi Efek, Datindo Entrycom, atas kepemilikan saham BNI selama tahun 2024 dan tahun 2023, semua kriteria untuk memperoleh fasilitas penurunan tarif pajak tersebut di atas telah terpenuhi.

Peraturan Menteri Keuangan No. PMK-136 Tahun 2024 (PMK-136) telah disahkan di Indonesia, yurisdiksi di mana perusahaan didirikan, dan akan berlaku mulai 1 Januari 2025. Karena PMK-136 belum efektif pada tanggal pelaporan, Grup tidak memiliki eksposur pajak saat ini yang terkait. Grup menerapkan pengecualian untuk mengakui dan mengungkapkan informasi tentang aset dan kewajiban pajak tangguhan yang terkait dengan pajak penghasilan Pilar Dua, sebagaimana diatur dalam amandemen PSAK 212 yang diterbitkan pada bulan Desember 2023.

***29. TAXATION** (continued)*

***c. Tax expense** (continued)*

For the fiscal years 2024 and 2023, based on Article 65 of Government Regulation No. 55 year 2022 regarding the Adjustment of Arrangements in Income Tax for Domestic Corporate Tax Payers in the Form of Public Companies, tax payers can obtain a reduction in the PPh rate of 3% (three percent) lower than the rate of domestic corporate tax payers as regulated in the Taxation Law, if it meets the following additional criteria:

1. *The public owned 40% (forty percent) or more of the total paid up shares and those shares are owned by at least 300 (three hundred) parties.*
2. *Each party can only own less than 5% (five percent) of total paid-up shares.*
3. *The tax payer should fulfill the above mentioned criteria at least within 6 (six) months (183 (one hundred and eighty three) calendar days) in 1 (one) fiscal year.*
4. *Parties that meet the requirements of 300 (three hundred) parties and 5% (five percent) as stated above, do not include: Public Company Tax Payers who buy back their shares; and/or Those who have a special relationship as stipulated in the Income Tax Law with Public Company Tax Payers (reflected in: share ownership by the controlling party and/or major shareholder).*

Based on the Monthly Shareholding Report Number DE/I/2025-0034 dated 3 January 2025 and Number DE/I/2024-0032 dated 3 January 2024 from the Registrar, Datindo Entrycom, regarding BNI's shares during the year 2024 and year 2023, BNI has met all criteria mentioned above to obtain a facility of tax rate reduction.

The MOF Regulation no. PMK-136 Year 2024 (PMK-136) was enacted in Indonesia, the jurisdiction in which the company is incorporated, and will come into effect from 1 January 2025. Since the PMK-136 was not effective at the reporting date, the Group has no related current tax exposure. The Group applies the exception to recognising and disclosing information about deferred tax assets and liabilities related to Pillar Two income taxes, as provided in the amendments to PSAK 212 issued in December 2023.

29. PERPAJAKAN (lanjutan)

c. Beban pajak (lanjutan)

Grup sedang dalam proses menilai apakah mereka termasuk dalam cakupan model Pilar Dua dan apakah ada eksposur terhadap PMK-136 ketika peraturan tersebut mulai berlaku. Karena kompleksitas dalam menerapkan PMK-136 dan menghitung pendapatan GloBE, dampak kuantitatif dari PMK-136 yang disahkan belum dapat diperkirakan secara wajar.

d. Aset pajak tangguhan - bersih

Aset pajak tangguhan pada tanggal 31 Desember 2024 dan 2023 merupakan pengaruh beda pajak dengan rincian sebagai berikut:

***29. TAXATION** (continued)*

***c. Tax expense** (continued)*

The Group is in the process of assessing whether they are within the scope of Pillar Two model and if there is any exposure to the PMK-136 for when it comes into effect. Due to the complexities in applying the PMK-136 and calculating GloBE income, the quantitative impact of the enacted PMK-136 is not yet reasonably estimable.

d. Deferred tax assets - net

The deferred tax assets as of 31 December 2024 and 2023 represent the tax effects on the following:

	2024				
	Saldo awal/ *Beginning balance*	**Dikreditkan/ (dibebankan) ke laporan laba rugi konsolidasian / Credited/ *(charged) to consolidated statement of profit or loss***	**Dibebankan ke ekuitas/ *Charged to equity***	**Saldo akhir/ *Ending balance***	
Rugi/(laba) yang belum direalisasi atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	73,445	-	130,992	204,437	*Unrealised loss/(gain) on financial assets at fair value through other comprehensive income*
Cadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	5,312,631	(208,987)	-	5,103,644	*Allowance for impairment losses on earning assets - loans*
Cadangan imbalan kerja	798,821	(7,041)	(98,826)	692,954	*Allowance for employee benefits*
Cadangan kerugian penurunan nilai aset produktif - selain pinjaman yang diberikan	822,199	(207,311)	-	614,888	*Allowance for impairment losses on earning assets - other than loans*
Cadangan hukum, kecurangan *(fraud)* dan lainnya	1,458	404	-	1,862	*Allowance for legal, fraud and others*
(Laba)/rugi yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(140,591)	(34,034)	-	(174,625)	*Unrealised (gain) loss on trading securities and derivative transactions*
Amortisasi Aset-Hak-Guna	19,358	10,041	-	29,399	*Right-of-Use Assets amortization*
Penyusutan aset tetap	4,433	40,877	(112,085)	(66,775)	*Depreciation of fixed assets*
Modifikasi arus kas kontraktual pinjaman yang diberikan	385,046	(4,680)	-	380,366	*Modification of contractual cash flows of loans*
Aset pajak tangguhan BNI - bersih	7,276,800	(410,731)	(79,919)	6,786,150	***Net deferred tax assets - BNI***
Aset pajak tangguhan Entitas Anak - bersih	163,818			163,446	***Net deferred tax assets - Subsidiaries***
Aset pajak tangguhan konsolidasian - bersih	**7,440,618**			**6,949,596**	***Net consolidated deferred tax assets***

Sesuai dengan ketentuan peralihan dalam Peraturan Menteri Keuangan Republik Indonesia Nomor 74 Tahun 2024, BNI telah melaksanakan perhitungan nilai tercatat cadangan piutang tak tertagih untuk awal tahun fiskal 2024 dan selisih lebih sebesar Rp 23.732.378 akan diakui sebagai biaya yang dibebankan seluruhnya untuk tahun fiskal 2025. Terkait dengan hal tersebut, aset pajak tangguhan yang akan dimanfaatkan BNI pada tahun fiskal 2025 sebesar Rp 4.509.152.

Based on the transitional provisions in the Regulation of the Minister of Finance of the Republic of Indonesia Number 74 of 2024, BNI has calculated the carrying value of the allowance for doubtful accounts for the beginning of the fiscal year 2024, and the excess amounting to Rp 23,732,378 will be recognised as an expense fully charged to the fiscal year 2025. In relation to the above, BNI will utilize deferred tax assets amounting to Rp 4,509,152 in the fiscal year 2025.

29. PERPAJAKAN (lanjutan)

d. Aset pajak tangguhan - bersih (lanjutan)

Aset pajak tangguhan pada tanggal 31 Desember 2024 dan 2023 merupakan pengaruh beda pajak dengan rincian sebagai berikut: (lanjutan)

***29. TAXATION** (continued)*

***d. Deferred tax assets - net** (continued)*

The deferred tax assets as of 31 December 2024 and 2023 represent the tax effects on the following: (continued)

	2023				
	Saldo awal/ *Beginning balance*	**Dikreditkan/ (dibebankan) ke laporan laba rugi konsolidasian / *Credited/ (charged) to consolidated statement of profit or loss and***	**Dibebankan ke ekuitas/ *Charged to equity***	**Saldo akhir/ *Ending balance***	
Rugi/(laba) yang belum direalisasi atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	296,083	-	(222,638)	73,445	*Unrealised loss/(gain) on financial assets at fair value through other comprehensive income*
Cadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	5,258,654	53,977	-	5,312,631	*Allowance for impairment losses on earning assets - loans*
Cadangan imbalan kerja	659,464	41,475	97,882	798,821	*Allowance for employee benefits*
Cadangan kerugian penurunan nilai aset produktif - selain pinjaman yang diberikan	958,979	(136,780)	-	822,199	*Allowance for impairment losses on earning assets - other than loans*
Cadangan hukum, kecurangan *(fraud)* dan lainnya	2,788	(1,330)	-	1,458	*Allowance for legal, fraud and others*
Laba yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(76,971)	(63,620)	-	(140,591)	*Unrealised gain on trading securities and derivative transactions*
Amortisasi Aset-Hak-Guna	13,875	5,483	-	19,358	*Right-of-Use Assets amortization*
Penyusutan aset tetap	(20,199)	24,632	-	4,433	*Depreciation of fixed assets*
Modifikasi arus kas kontraktual pinjaman yang diberikan	393,666	(8,620)	-	385,046	*Modification of contractual cash flows of loans*
Aset pajak tangguhan BNI - bersih	7,486,339	(84,783)	(124,756)	7,276,800	***Net deferred tax assets - BNI***
Aset pajak tangguhan Entitas Anak - bersih	128,145			163,818	***Net deferred tax assets - Subsidiaries***
Aset pajak tangguhan konsolidasian - bersih	**7,614,484**			**7,440,618**	***Net consolidated deferred tax assets***

Manajemen berpendapat bahwa aset pajak tangguhan dapat dipulihkan seluruhnya.

Management believes that deferred tax assets are fully realisable.

e. Surat ketetapan pajak

Pada tanggal 5 Februari 2018, BNI telah menerima Surat Ketetapan Pajak Kurang Bayar (SKPKB) atas PPh Badan untuk tahun fiskal 2015 sebesar Rp2.461.364 (termasuk denda) dan disetujui BNI sebesar Rp162.130. Pada tanggal 2 Maret 2018, BNI telah melakukan pembayaran sebagian SKPKB sebesar Rp1.785.691. Pada tanggal 4 Mei 2018, BNI mengajukan surat keberatan atas Surat Ketetapan Pajak Kurang Bayar (SKPKB) ke Direktorat Jenderal Pajak.

e. Tax assessment letters

On 5 February 2018, BNI received tax assessment for underpayment of tax (SKPKB) which stated that there was an under payment of corporate income tax for fiscal year 2015 amounting to Rp2,461,364 (including penalties) which was partially agreed by BNI for the amount of Rp162,130. On 2 March 2018, BNI made a partial payment for the amount of Rp1,785,691. On 4 May 2018, BNI submitted Objection Letter for these SKPKB to the Directorate General of Tax.

29. PERPAJAKAN (lanjutan)

e. Surat ketetapan pajak (lanjutan)

Pada tanggal 30 April 2019, BNI menerima Keputusan Direktorat Jenderal Pajak yang mengabulkan sebagian keberatan BNI dan mengurangkan jumlah pajak yang masih harus dibayar dalam SKPKB atas PPh Badan untuk tahun fiskal 2015 (termasuk denda) menjadi Rp1.212.517 dan disetujui BNI sebesar Rp163.628. Atas kelebihan pembayaran pajak di muka sebesar Rp573.174, setelah dikurangi dengan STP tahun 2019 sebesar Rp481, Bank telah menerima restitusi pajak melalui kompensasi pembayaran pajak penghasilan badan tahun 2019. Pada tanggal 26 Juli 2019, BNI telah mengajukan permohonan banding keberatan ke Pengadilan Pajak. Pada tanggal 24 Juni 2022, BNI menerima Putusan Banding dari Pengadilan Pajak yang mengabulkan sebagian banding BNI dan mengurangkan jumlah pajak yang masih harus dibayar dalam SKPKB atas PPh Badan untuk tahun fiskal 2015 (termasuk denda) menjadi Rp789.519. Pada tanggal 5 Oktober 2022, BNI telah mengajukan upaya hukum Peninjauan Kembali ke Mahkamah Agung atas putusan banding tersebut. Pada tanggal 30 September 2024, Mahkamah Agung telah menerbitkan putusan yang menguatkan putusan Pengadilan Pajak. BNI telah menerima hasil Peninjauan Kembali tersebut dan telah membebankan pembayaran pajak tersebut pada laba rugi tahun berjalan.

***29. TAXATION** (continued)*

***e. Tax assessment letters** (continued)*

On 30 April 2019, BNI received Directorate General of Tax decision which partially approved BNI Objection and reduced the SKPKB for fiscal year 2015 (including penalties) to become Rp1,212,517 which is partially agreed by BNI amounting to Rp163,628. For the overpayment amounting to Rp573,174, after less of STP for fiscal year 2019 amounting to Rp481, the Bank has received a tax refund through compensation for corporate income tax in 2019. On 26 July 2019, BNI submitted the request for appeal on the above to the Tax Court. On 24 June 2022, BNI received an Appeal Decision from the Tax Court which partially granted BNI's appeal and reduced the amount of tax accrued in the SKPKB on Corporate Income Tax for the 2015 fiscal year (including fines) to Rp789,519. On 5 October 2022, BNI submitted the Judicial Review to the Supreme Court for the appeal decision. On 30 September 2024, the Supreme Court issued a decision confirming the Tax Court's decision. BNI agreed with the result of Judicial Review and charged the tax payment to the current year profit or loss.

30. EFEK-EFEK YANG DITERBITKAN

30. SECURITIES ISSUED

a. Berdasarkan jenis

a. By type

	2024		2023		
	Saldo/ *Balance*	**Peringkat/ *Rating* *)**	**Saldo/ *Balance***	**Peringkat/ *Rating* *)**	
Global Bond, setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.513 pada tanggal 31 Desember 2024	8,045,987	BBB*) BBB-**)	-	-	*Global Bond, net of unamortised issuance cost amounting to Rp1,513 as of 31 December 2024*
Green Bond, setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp704 pada tanggal 31 Desember 2024 dan Rp1.720 pada tanggal 31 Desember 2023	4,928,510	idAAA***)	4,893,357	idAAA*)	*Green Bond, net of unamortised issuance cost amounting to Rp704 as of 31 December 2024 and Rp1,720 as of 31 December 2023*
Total	12,974,497		4,893,357		*Total*

*) *S&P*
**) *Fitch*
***) *Pefindo*

*S&P *)*
*Fitch **)*
*S&P ***)*

30. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022

Pada tanggal 21 Juni 2022, BNI telah menerbitkan Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022 ("*Green Bond* I 2022") dengan nominal sebesar Rp5.000.000 yang terdiri atas 2 seri:

***30. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022

On 21 June 2022, BNI has issued Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022 ("Green Bond I 2022") with total amount of Rp5,000,000 which consists of 2 series:

	Nominal/ *Amount*	Kupon/ *Coupon*	Jatuh tempo/ *Maturity Date*	
Obligasi Seri A	4,000,000	6.35%	21 Juni/*June* 2025	*Obligation Serie A*
Obligasi Seri B	1,000,000	6.85%	21 Juni/*June* 2027	*Obligation Serie B*

Green Bond I 2022 ditawarkan dengan nilai 100% (seratus persen) dari jumlah pokok obligasi, dengan kupon dibayarkan setiap kuartalan, dan tercatat di Bursa Efek Indonesia (IDX) pada 22 Juni 2022. Penawaran Umum *Green Bond* I 2022 telah mendapatkan Izin Efektif OJK melalui surat OJK No. S-93/D.04/2022 tanggal 10 Juni 2022.

Green Bond I 2022 is offered with a value of 100% (one hundred percent) of the principal amount of the bond, with coupons paid quarterly, and listed on the Indonesia Stock Exchange (IDX) on 22 June 2022. The Green Bond I 2022 Public Offering has obtained OJK Effective Permission through OJK letter No. S-93/D.04/2022 dated 10 June 2022.

Pada tanggal 31 Desember 2024, BNI *Green Bond* 2022 memiliki nilai bersih sebesar Rp4.928.510 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp704 (31 Desember 2023 memiliki nilai bersih sebesar Rp4.893.357 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.720).

As of 31 December 2024, BNI Green Bond 2022 had a net value of Rp4,928,510 after deducting the unamortised issuance fee of Rp704 (31 December 2023, BNI Green Bond 2022 had a net value of Rp4,893,357 after deducting the unamortised issuance fee of Rp1,720).

Dana hasil penerbitan obligasi setelah dikurangi biaya biaya emisi, seluruhnya akan digunakan BNI untuk pembiayaan maupun pembiayaan kembali proyek-proyek dalam kategori Kegiatan Usaha Berwawasan Lingkungan (KUBL), yaitu proyek-proyek yang berkaitan dengan energi terbarukan, efisiensi energi, pengolahan sampah menjadi energi dan manajemen limbah, penggunaan sumber daya alam dan penggunaan tanah yang berkelanjutan, konservasi keanekaragaman hayati darat dan air, transportasi ramah lingkungan, pengelolaan air dan air limbah yang berkelanjutan, adaptasi perubahan iklim, gedung berwawasan lingkungan, dan pertanian berkelanjutan, dengan memperhatikan Peraturan OJK No. 60/POJK.04/2017 tentang Penerbitan dan Persyaratan Efek Bersifat Utang Berwawasan Lingkungan *(Green Bond)*.

The proceeds from the bond issuance after deducting emission costs will be entirely used by BNI to finance and refinance projects in the Environmental Based Business Activity (hereinafter abbreviated as KUBL or Kegiatan Usaha Berwawasan Lingkungan) category, namely, projects related to renewable energy,energy efficiency, waste processing into energy, and waste management, sustainable use of natural resources and land use, conservation of terrestrial and aquatic biodiversity, environmentally-friendly transportation, sustainable management of water and wastewater, adaptation to climate change, environmentally sound buildings, and sustainable agriculture, with due observance of OJK Regulation No. 60/POJK.04/2017 concerning the Issuance and Terms of Green Bonds.

30. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022 (lanjutan)

BNI telah memperoleh rating idAAA atas *Green Bond* I 2022 dari PT Pemeringkat Efek Indonesia (PEFINDO) pada tanggal 8 Maret 2024 dan Opini Pihak Kedua yang diberikan oleh Sustainalytics pada tanggal 20 September 2024.

Obligasi Senior BNI *Global Bond* 2024

Pada tanggal 5 April 2024, BNI telah menerbitkan Obligasi Senior denominasi USD, BNI *Global Bond* 2024 sebesar nilai nominal USD 500.000.000 (nilai penuh) dengan tenor 5 tahun.

BNI *Global Bond* 2024 ditawarkan dengan nilai 100% (seratus persen) dari nilai pokok obligasi dengan kupon sebesar 5,28% per tahun yang dibayarkan setiap semester dan tercatat pada *Singapore Exchange* (SGX) dengan merujuk pada ketentuan *Regulation S* (”Reg S”) berdasarkan *US Securities Act*.

Pada tanggal 31 Desember 2024, BNI *Global Bond* 2024 memiliki nilai bersih sebesar Rp8.045.987 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.513.

Dana hasil penerbitan BNI *Global Bond* 2024 akan digunakan untuk keperluan pembiayaan dan pendanaan umum BNI dalam rangka pengembangan usaha serta peningkatan komposisi struktur dana jangka panjang BNI

BNI telah memperoleh hasil pemeringkatan atas BNI *Global Bond* 2024 dari S&P dan Fitch dengan peringkat masing-masing BBB dan BBB-.

***30. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

***Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022** (continued)*

BNI has obtained idAAA rating results for Green Bond I 2022 from PT Pemeringkat Efek Indonesia (PEFINDO) on 8 March 2024 and also Second-party Opinion which has given by Sustainalytics on 20 September 2024.

Senior bond BNI Global Bond 2024

On 5 April 2024, BNI has issued USD denominated Senior Bond, BNI Global Bond 2024 with total nominal value of USD 500,000,000 (full amount) with a tenor of 5 years.

BNI Global Bond 2024 was offered with a value of 100% (one hundred percent) of the principal amount of the bond, with coupons of 5.28% (five point twenty-eight percent) per annum which paid semi-annually and listed on the Singapore Exchange (SGX) by referring to the Regulation S ("Reg S") under the US Securities Act.

As of 31 December 2024, the net value of BNI Global Bond 2024 was Rp8,045,987 after deducting unamortised issuance cost amounted Rp1,513.

The proceeds from the issuance of BNI Global Bond 2024 will be allocated for BNI's financing and general funding purposes to support business expansion and optimizing the composition of the long-term fund structure.

BNI has obtained ratings for BNI Global Bond 2024 from S&P and Fitch with ratings of BBB and BBB-, respectively.

30. EFEK-EFEK YANG DITERBITKAN (lanjutan) / *30. SECURITIES ISSUED (continued)*

b. Berdasarkan mata uang / *b. By currency*

	2024	2023	
Mata uang asing			***Foreign currencies***
Global Bond, setelah dikurangi diskonto yang belum diamortisasi sebesar Rp1.513 pada tanggal 31 Desember 2024	8,045,987	-	*Global Bond, net of unamortised discount cost of Rp1,513 as of 31 December 2024*
Rupiah			***Rupiah***
Green Bond, setelah dikurangi diskonto yang belum diamortisasi sebesar Rp704 pada tanggal 31 Desember 2024 dan sebesar Rp1.720 pada tanggal 31 Desember 2023	4,928,510	4,893,357	*Green Bond, net of unamortised discount cost of Rp704 as of 31 December 2024 and Rp1,720 as of 31 December 2023*
	12,974,497	**4,893,357**	

c. Berdasarkan hubungan / *c. By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	1,891,832	1,764,505	*Rupiah*
Pihak ketiga			***Third parties***
Mata uang asing	8,045,987	-	*Foreign currencies*
Rupiah	3,036,678	3,128,852	*Rupiah*
	11,082,665	3,128,852	
	12,974,497	**4,893,357**	

Informasi mengenai efek-efek yang diterbitkan kepada pihak-pihak berelasi diungkapkan pada Catatan 45m.

Information related to securities issued to related parties are disclosed in Note 45m.

d. Tingkat suku bunga per tahun / *d. Annual interest rates*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
2024	6.35 - 6.85	5,28	*2024*
2023	6.35 - 6.85	-	*2023*

31. PINJAMAN YANG DITERIMA / *31. BORROWINGS*

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2024	2023	
Rupiah			***Rupiah***
Pinjaman penerusan	53	53	*Two step loans*
Kredit likuiditas untuk kredit koperasi primer kepada anggotanya	914	914	*Liquidity loan for member of primary cooperatives*
Lain-lain	2,910,116	1,031,535	*Others*
	2,911,083	1,032,502	
Mata uang asing			***Foreign currencies***
Pinjaman bilateral	35,115,128	21,856,207	*Bilateral loans*
Bankers acceptance	4,171,560	7,767,787	*Bankers acceptance*
Pinjaman penerusan	48,504	51,808	*Two step loans*
Lain-lain	685,169	241,304	*Others*
	40,020,361	29,917,106	
	42,931,444	**30,949,608**	

Pinjaman bilateral

BNI memiliki pinjaman bilateral sebagai salah satu strategi pendanaan Bank untuk menjaga komposisi pendanaan jangka pendek dan jangka panjang. Termasuk di dalam pinjaman bilateral adalah fasilitas pinjaman di bawah ini:

a) Pinjaman bilateral luar negeri dengan China Development Bank sebesar USD700.000.000 (nilai penuh) dengan jangka waktu pinjaman selama 10 tahun serta tingkat suku bunga LIBOR 6 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 16 September 2025. Sehubungan dengan adanya transisi LIBOR, Bank telah melakukan amandemen perjanjian penggunaan *reference rate* dari LIBOR 6 bulan ditambah margin tertentu per tahun menjadi SOFR 6 bulan ditambah margin tertentu per tahun yang telah berlaku. Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi masing-masing sebesar USD93.392.840 (nilai penuh) atau ekuivalen Rp1.503.158 dan USD186.736.438 (nilai penuh) atau ekuivalen Rp2.875.182.

Bilateral loans

BNI has bilateral loan which is one of the Bank's strategy to maintain funding profile between short term and long term funding. Bilateral loans include the following borrowing facilities:

a) Offshore bilateral loan with China Development Bank amounting to USD700,000,000 (full amount) with tenure of 10 years and with interest rate of 6-month LIBOR plus a certain margin per annum and will mature on 16 September 2025. Regarding to the LIBOR transition, the Bank had amended the agreement for the use of reference rate from 6-month LIBOR plus a certain margin per annum to 6-month SOFR plus a certain margin per annum which already applies. As of 31 December 2024 and 2023, outstanding loan less unamortised issuance costs amounted to USD93,392,840 (full amount) or equivalent to Rp1,503,158 and USD186,736,438 (full amount) or equivalent to Rp2,875,182, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

b) Pinjaman bilateral luar negeri dengan China Development Bank sebesar USD189.000.000 (nilai penuh) dengan jangka waktu pinjaman selama 10 tahun serta tingkat suku bunga LIBOR 6 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 16 September 2025. Sehubungan dengan adanya transisi LIBOR, Bank telah melakukan amandemen perjanjian penggunaan *reference rate* dari LIBOR 6 bulan ditambah margin tertentu per tahun menjadi SOFR 6 bulan ditambah margin tertentu per tahun yang telah berlaku. Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi masing-masing sebesar USD37.698.436 (nilai penuh) atau ekuivalen Rp606.756 dan USD75.369.011 (nilai penuh) atau ekuivalen Rp1.160.457.

c) Pada tanggal 25 November 2019, BNI memperoleh fasilitas pinjaman bilateral luar negeri dengan CTBC Bank Co. Ltd., MUFG Bank Ltd., Standard Chartered Bank (Singapore) Ltd., Sumitomo Mitsui Banking Corporation Singapore Branch, dan United Overseas Bank Ltd. sebagai *Mandated Lead Arrangers & Bookrunners* senilai USD750.000.000 (nilai penuh) yang terbagi dalam dua *tranche*, yaitu *tranche* A dan *tranche* B. *Tranche* A sebesar USD375.000.000 (nilai penuh) dengan jangka waktu 42 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan telah jatuh tempo pada tanggal 25 Mei 2023, sedangkan *tranche* B sebesar USD375.000.000 (nilai penuh) dengan jangka waktu 60 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan telah jatuh tempo pada tanggal 25 November 2024. Standard Chartered Bank (Hong Kong) Ltd. bertindak sebagai Agen untuk fasilitas pinjaman ini.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

b) Offshore bilateral loan with China Development Bank amounting to USD189,000,000 (full amount) with tenure of 10 years and with interest rate of 6-month LIBOR plus a certain margin per annum and will mature on 16 September 2025. Regarding to the LIBOR transition, the Bank had amended the agreement for the use of reference rate from 6-month LIBOR plus a certain margin per annum to 6-month SOFR plus a certain margin per annum which already applies. As of 31 December 2024 and 2023, outstanding loan less unamortised issuance costs amounted to USD37,698,436 (full amount) or equivalent to Rp606,756 and USD75,369,011 (full amount) or equivalent to Rp1,160,457.

c) On 25 November 2019, BNI obtained offshore bilateral loan with CTBC Bank Co. Ltd., MUFG Bank Ltd., Standard Chartered Bank (Singapore) Ltd., Sumitomo Mitsui Banking Corporation Singapore Branch, and United Overseas Bank Ltd. as Mandated Lead Arrangers & Bookrunners amounting to USD750,000,000 (full amount) which was split into two tranches, tranche A and tranche B. Tranche A amounting to USD375,000,000 (full amount) with tenure of 42 months with interest rate of 3-month LIBOR plus a certain margin per annum has matured on 25 May 2023, while tranche B amounting to USD375,000,000 (full amount) with tenure of 60 months with interest of 3-month LIBOR plus a certain margin per annum has matured on 25 November 2024. Standard Chartered Bank (Hong Kong) Ltd acted as the Agent for this loan facility.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

c) Pada tanggal 25 Februari 2020, BNI memperoleh fasilitas tambahan fasilitas pinjaman bilateral senilai USD220.000.000 (nilai penuh) yang terbagi dalam dua *tranche*, yaitu *tranche* A dan *tranche* B. *Tranche* A mendapat tambahan sebesar USD135.000.000 (nilai penuh) dengan jangka waktu 39 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan telah tempo pada tanggal 25 Mei 2023. Sedangkan *tranche* B sebesar USD85.000.000 (nilai penuh) dengan jangka waktu 57 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan telah jatuh tempo pada tanggal 25 November 2024 dan tidak diperpanjang.

Sehubungan dengan adanya transisi LIBOR, Bank telah melakukan amendemen perjanjian penggunaan *reference rate* dari LIBOR 3 bulan ditambah margin tertentu per tahun menjadi SOFR 3 bulan ditambah margin tertentu per tahun yang telah berlaku.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi masing-masing sebesar USDnihil atau ekuivalen Rpnihil dan USD457.405.333 (nilai penuh) atau ekuivalen Rp7.042.668.

d. BNI, melalui BNI cabang Singapura dan London memiliki pinjaman bilateral luar negeri dengan konsorsium bank yang terdiri dari Bank of China (Hong Kong) Limited, CTBC Bank Co., LTD, CITI Group Global Market Asia Limited, Oversea-Chinese Banking Corporation Limited, dan United Overseas Bank Limited sebesar USD500.000.000 (nilai penuh) dengan jangka waktu pinjaman selama 3 tahun dengan tingkat suku bunga SOFR ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 28 September 2025. Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut setelah dikurangi biaya yang belum diamortisasi masing-masing sebesar USD500.000.000 (nilai penuh) atau ekuivalen Rp8.047.500 dan USD500.000.000 (nilai penuh) atau ekuivalen Rp7.698.500.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

c) On 25 February 2020, BNI obtained additional offshore bilateral loan with amounting to USD220,000,000 (full amount) split into two tranches, tranche A and tranche B. Tranche A obtained additional amounting to USD135,000,000 (full amount) with tenure of 39 months with interest of 3 months LIBOR plus a certain margin per annum and has matured on 25 May 2023. While tranche B obtained additional amounting to USD85,000,000 (full amount) with tenure of 57 months with interest rate of 3 months LIBOR plus a certain margin per annum and has matured on 25 November 2024 and was not renewed.

Regarding to the LIBOR transition, the Bank had amended the agreement for the use of reference rate from 3-month LIBOR plus a certain margin per annum to 3-month SOFR plus a certain margin per annum which already applies.

As of 31 December 2024 and 2023, outstanding loan less unamortised issuance costs amounted to USDnil or equivalent to Rpnil and USD457,405,333 (full amount) or equivalent to Rp7,042,668, respectively.

d. BNI, through Singapore and London branches, has offshore bilateral loan with consortium of banks consisting of Bank of Bank of China (Hong Kong) Limited, CTBC Bank Co., LTD, CITI Group Global Market Asia Limited, Oversea-Chinese Banking Corporation Limited, dan United Overseas Bank Limited amounting to USD500,000,000 (full amount) with tenure of 3 years and with interest of SOFR plus a certain margin per annum and will mature on 28 September 2025. As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to USD500,000,000 (full amount) or equivalent to Rp8,047,500 and to USD500,000,000 (full amount) or equivalent to Rp7,698,500.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

e) Pada tanggal 22 November 2023, BNI memperoleh fasilitas pinjaman bilateral dalam negeri dengan MUFG Bank, Ltd. senilai USD200.000.000 (nilai penuh) dengan jangka waktu 3 tahun. Tingkat suku bunga pinjaman adalah suku bunga tetap 6% per tahun untuk tahun pertama, dan selanjutnya menjadi tingkat suku bunga mengambang dengan menggunakan SOFR 3 bulan ditambah margin tertentu per tahun. Fasilitas ini akan jatuh tempo pada tanggal 20 November 2026. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut sebesar USD200.000.000 (nilai penuh) atau ekuivalen Rp3.219.000 (31 Desember 2023: USD200.000.000 (nilai penuh) atau ekuivalen Rp3.079.400).

Persyaratan-persyaratan penting (*financial covenants*) dalam perjanjian pinjaman Bank antara lain:

- Rasio *Non-Performing Loan* (NPL) maksimum 5%.
- Nilai *Capital Adequacy Ratio* (CAR) minimum 9% atau sesuai dengan ketentuan regulasi yang berlaku.
- Nilai Rasio Modal Inti (*Tier 1 Ratio*) minimum 6%.
- Nilai Rasio Modal Inti Utama (*Core Tier 1 Ratio*) minimum 5%.
- Rasio *Return on Average Assets* minimum 0,6%, dengan ketentuan bahwa jika nilai *Capital Adequacy Ratio* (CAR) sama dengan atau lebih besar dari 12,5%.

Pada tahun yang berakhir pada 31 Desember 2024 dan 2023, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

e) On 22 November 2023, BNI obtained onshore bilateral loan with MUFG Bank, Ltd. amounting to USD200,000,000 (full amount) with a tenure of 3 years. Interest rate of the borrowing is a fixed interest rate of 6% per annum for the first year, and then a floating interest rate using 3-month SOFR plus a certain margin per year. This loan facility will mature on 20 November 2026. As of 31 December 2024, the outstanding loan balance under this facility amounted to USD200,000,000 (full amount) or equivalent to Rp3,219,000 (31 December 2023: USD200,000,000 (full amount) or equivalent to Rp3,079,400).

The significant requirements (financial covenants) in the Bank's loan agreement include the following:

- *Non-Performing Loan (NPL) ratio maximum of 5%.*
- *Capital Adequacy Ratio (CAR) minimum 9% or according to the applicable regulation.*
- *Tier 1 Ratio minimum of 6%.*
- *Core Tier 1 Ratio minimum of 5%.*
- *Return on Average Assets ratio minimum of 0.6%, provided that Capital Adequacy Ratio (CAR) is equal to or greater than 12.5%.*

During the years ended 31 December 2024 and 2023, the Bank has fulfilled the terms required set forth in the agreements.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

f) Pada tanggal 16 Oktober 2024, BNI memperoleh fasilitas pinjaman bilateral tambahan dengan MUFG Bank, Ltd. senilai USD100.000.000 (nilai penuh) dengan jangka waktu 4 tahun dihitung dari tanggal penarikan. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Penarikan atas pinjaman ini dilakukan pada tanggal 18 Oktober 2024 dan akan jatuh tempo pada tanggal 18 Oktober 2028. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut sebesar USD99.433.300 (nilai penuh) atau ekuivalen Rp1.600.379.

Persyaratan-persyaratan penting (*financial covenants*) dalam perjanjian pinjaman Bank antara lain:
- Rasio *Non-Performing Loan* (NPL) Neto maksimum 5%.
- Nilai *Capital Adequacy Ratio* (CAR) minimum 9,9% atau sesuai dengan ketentuan regulasi yang berlaku.

Pada tahun yang berakhir pada 31 Desember 2024 dan 2023, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

g) Pada tanggal 8 November 2024, BNI memperoleh fasilitas pinjaman dengan konsorsium bank yang terdiri dari Bank of America, CIMB Bank Berhad, CTBC Bank Co.,LTD., DBS Bank LTD., Oversea-Chinese Banking Corporation Limited, dan The Hongkong and Shanghai Banking Corporation Limited sebesar USD 600.000.000 (nilai penuh) dengan jangka waktu pinjaman selama 4 tahun dengan tingkat suku bunga mengambang SOFR ditambah margin tertentu per tahun. Penarikan atas pinjaman ini dilakukan pada tanggal 20 November 2024 dan akan jatuh tempo pada 20 Agustus 2028. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut setelah dikurangi biaya yang belum diamortisasi masing-masing sebesar USD595.579.612 (nilai penuh) atau ekuivalen Rp9.585.854.

Persyaratan-persyaratan penting (*financial covenants*) dalam perjanjian pinjaman Bank antara lain:
- Rasio *Non-Performing Loan* (NPL) Neto maksimum 5%.
- Nilai *Capital Adequacy Ratio* (CAR) minimum 9,9% atau sesuai dengan ketentuan regulasi yang berlaku.

Pada tahun yang berakhir pada 31 Desember 2024 dan 2023, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

f) On 16 October 2024, BNI obtained an additional bilateral loan facility with MUFG Bank, Ltd. worth USD100,000,000 (full amount) with a term of 4 years calculated from the drawdown date. The interest rate of the loan is based on the SOFR floating interest rate, plus a certain margin. The drawdown of this loan was approved on 18 October 2024 and will mature on 18 October 2028. As of 31 December 2024, the balance of the loan facility amounted to USD99,433,300 (full amount) or equivalent to Rp1,600,379.

The significant requirements (financial covenants) in the Bank's loan agreement include the following:
- *Non-Performing Loan (NPL) Net ratio maximum of 5%.*
- *Capital Adequacy Ratio (CAR) minimum 9.9% or according to the applicable regulation.*

During the years ended 31 December 2024 and 2023, the Bank has fulfilled the terms required set forth in the agreements.

g) On 8 November 2024, BNI obtained a loan facility with a consortium of banks consisting of Bank of America, CIMB Bank Berhad, CTBC Bank Co., LTD., DBS Bank LTD., Oversea-Chinese Banking Corporation Limited, and The Hongkong and Shanghai Banking Corporation Limited amounting to USD 600,000,000 (full amount) with a loan term of 4 years and SOFR floating interest rate plus a certain margin per year. The withdrawal of this loan was approved on 20 November 2024 and will mature on 20 August 2028. As of 31 December 2024, the balance of the loan facility after deducting unamortized costs amounted to USD 595,579,612 (full amount) or equivalent to Rp9,585,854.

The significant requirements (financial covenants) in the Bank's loan agreement include the following:
- *Non-Performing Loan (NPL) Net ratio maximum of 5%.*
- *Capital Adequacy Ratio (CAR) minimum 9.9% or according to the applicable regulation.*

During the years ended 31 December 2024 and 2023, the Bank has fulfilled the terms required set forth in the agreements.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

h) Pada tanggal 1 Agustus 2024, BNI memperoleh fasilitas pinjaman dengan Caixabank, S.A. senilai USD25.000.000 (nilai penuh) dengan jangka waktu 6 bulan. Penarikan atas pinjaman ini dilakukan pada tanggal 2 Agustus 2024 dan akan jatuh tempo pada tanggal 3 Februari 2025. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu yang akan dibayarkan sepenuhnya saat jatuh tempo. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut sebesar USD25.000.000 (nilai penuh) atau ekuivalen Rp402.375.

i) Pada tanggal 2 Agustus 2024, BNI memperoleh fasilitas pinjaman dengan Emirates NBD Bank (P.J.S.C) senilai USD100.000.000 (nilai penuh) dengan jangka waktu 6 bulan. Penarikan atas pinjaman ini dilakukan pada tanggal 5 Agustus 2024 dan akan jatuh tempo pada tanggal 31 Januari 2025. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu yang akan dibayarkan sepenuhnya saat jatuh tempo. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut sebesar USD100.000.000 (nilai penuh) atau ekuivalen Rp1.609.500.

j) Pada tanggal 5 Agustus 2024, BNI memperoleh fasilitas pinjaman dengan Wells Fargo Bank National Association senilai USD20.000.000 (nilai penuh) dengan jangka waktu 6 bulan. Penarikan atas pinjaman ini dilakukan pada tanggal 7 Agustus 2024 dan akan jatuh tempo pada tanggal 3 Februari 2025. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu yang akan dibayarkan sepenuhnya saat jatuh tempo. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut sebesar USD20.000.000 (nilai penuh) atau ekuivalen Rp321.900.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

h) On 1 August 2024, BNI obtained a loan facility with Caixabank, SA worth USD25,000,000 (full amount) with a term of 6 months. The withdrawal of this loan was approved on 2 August 2024 and will mature on 3 February 2025. The interest rate on the loan uses the SOFR floating interest rate as a reference plus a certain margin that will be paid in full at maturity. As of 31 December 2024, the balance of the loan facility was USD25,000,000 (full amount) or equivalent to Rp402,375.

i) On 2 August 2024, BNI obtained a loan facility with Emirates NBD Bank (P.J.S.C) worth USD100,000,000 (full amount) with a term of 6 months. The withdrawal of this loan was approved on 5 August 2024 and will mature on 31 January 2025. The interest rate on the loan uses the SOFR floating interest rate as a reference plus a certain margin that will be paid in full at maturity. As of 31 December 2024, the balance of the loan facility was USD100,000,000 (full amount) or equivalent to Rp1,609,500.

j) On 5 August 2024, BNI obtained a loan facility with Wells Fargo Bank National Association worth USD20,000,000 (full amount) with a term of 6 months. The withdrawal of this loan was approved on 7 August 2024 and will mature on 3 February 2025. The interest rate of the loan uses the SOFR floating interest rate as a reference plus a certain margin that will be paid in full at maturity. As of 31 December 2024, the balance of the loan facility was USD20,000,000 (full amount) or equivalent to Rp321,900.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

k) BNI, melalui BNI cabang Tokyo memperoleh fasilitas pinjaman bilateral luar negeri dengan MUFG Bank, Ltd. dengan maksimum fasilitas USD100.000.000 (nilai penuh). Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 30 Desember 2024 dan 29 November 2024 masing-masing sebesar USD50.000.000 dan USD25.000.000. Fasilitas ini memiliki jatuh tempo maksimal 3 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 31 Maret 2025 dan 28 Februari 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar USD75.000.000 (nilai penuh) atau ekuivalen Rp1.207.125.

l) BNI, melalui BNI cabang Singapura memperoleh fasilitas pinjaman bilateral luar negeri dengan Emirates NBD Bank (P.J.S.C) sebesar USD50.000.000 (nilai penuh) dan jatuh tempo maksimal 9 bulan sejak tanggal penarikan masing-masing pinjaman. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Penarikan atas fasilitas pinjaman ini dilakukan pada tanggal 21 June 2024 dan akan jatuh tempo pada tanggal 18 Maret 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar USD50.000.000 (nilai penuh) atau ekuivalen Rp804.750.

m) BNI, melalui BNI cabang Singapura memperoleh fasilitas pinjaman bilateral luar negeri dengan Australia and New Zealand Banking Group Limited sebesar AUD78.840.402 (nilai penuh) dan jatuh tempo maksimal 1 tahun sejak tanggal penarikan pinjaman. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga *Bank Bill Swap Rate* (BBSY) ditambah margin tertentu. Penarikan atas fasilitas pinjaman ini dilakukan pada tanggal 19 Desember 2024 dan akan jatuh tempo pada tanggal 19 Desember 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar AUD78.840.402 (nilai penuh) atau ekuivalen Rp789.469.

31. BORROWINGS *(continued)*

a. By type and currency *(continued)*

Bilateral loans *(continued)*

k) BNI, through BNI Tokyo branch, obtained a bilateral offshore loan facility with MUFG Bank, Ltd. with a maximum facility of USD100,000,000 (full amount). The interest rate of the loan uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 30 December 2024 and 29 November 2024, amounting to USD50,000,000 and USD25,000,000, respectively. This facility has a maximum maturity of 3 months from the date of withdrawal of each loan, namely on 31 March 2025 and 28 February 2025. As of 31 December 2024, the loan balance of the facility was USD75,000,000 (full amount) or equivalent to Rp1,207,125.

l) BNI, through BNI Singapore branch, obtained a bilateral offshore loan facility with Emirates NBD Bank (P.J.S.C) of USD50,000,000 (full amount) and a maximum maturity of 9 months from the date of withdrawal of each loan. The loan interest rate uses the SOFR floating interest rate as a reference plus a certain margin. The withdrawal of this loan facility was approved on 21 June 2024 and will mature on 18 March 2025. As of 31 December 2024, the loan balance of the facility was USD50,000,000 (full amount) or equivalent to Rp804,750.

m) BNI, through BNI Singapore branch, obtained a bilateral overseas loan facility with Australia and New Zealand Banking Group Limited amounting to AUD78,840,402 (full amount) and a maximum maturity of 1 year from the date of loan withdrawal. The loan interest rate uses the Bank Bill Swap Rate (BBSY) interest rate as a reference plus a certain margin. The withdrawal of this loan facility was made on 19 December 2024 and will mature on 19 December 2025. As of 31 December 2024, the loan balance of the facility was AUD78,840,402 (full amount) or equivalent to Rp789,469.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

n) BNI, melalui BNI cabang Singapura memperoleh fasilitas pinjaman bilateral luar negeri dengan United Overseas Bank Limited sebesar SGD90.000.000 (nilai penuh) dan jatuh tempo maksimal 359 hari sejak tanggal penarikan pinjaman. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga *Singapore Overnight Rate Average* (SORA). Penarikan atas fasilitas pinjaman ini dilakukan pada tanggal 1 April 2024 dan akan jatuh tempo pada tanggal 26 Maret 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar SGD90.000.000 (nilai penuh) atau ekuivalen Rp1.066.012.

o) BNI, melalui BNI cabang Hongkong memperoleh fasilitas pinjaman bilateral luar negeri dengan MUFG Bank, Ltd. dengan maksimum fasilitas USD 100.000.000 (nilai penuh). Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 22 Oktober 2024, 6 November 2024 dan 3 Desember 2024 masing-masing sebesar USD60.000.000, USD20.000.000 dan USD20.000.000. Fasilitas ini memiliki jatuh tempo maksimal 3 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 22 Januari 2025, 6 Februari 2025 dan 3 Maret 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar USD100.000.000 (nilai penuh) atau ekuivalen Rp1.609.500.

p) BNI, melalui BNI cabang Hongkong memperoleh fasilitas pinjaman bilateral luar negeri dengan China Construction Bank (Asia) Corporation Limited dengan maksimum fasilitas USD100.000.000 (nilai penuh). Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 26 Juni 2024 dan 26 Juli 2024 masing-masing sebesar USD10.000.000 dan USD90.000.000. Fasilitas ini memiliki jatuh tempo maksimal 1 tahun sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 26 Juni 2025 dan 26 Juli 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar USD100.000.000 (nilai penuh) atau ekuivalen Rp1.609.500.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

n) BNI, through BNI Singapore branch, obtained a bilateral overseas loan facility with United Overseas Bank Limited amounting to SGD90,000,000 (full amount) and a maximum maturity of 359 days from the date of loan withdrawal. The loan interest rate uses the Singapore Overnight Rate Average (SORA) interest rate as a reference. The withdrawal of this loan facility was made on 1 April 2024 and will mature on 26 March 2025. As of 31 December 2024, the loan balance of the facility was SGD90,000,000 (full amount) or equivalent to Rp1,066,012.

o) BNI, through BNI Hongkong branch, obtained a bilateral offshore loan facility with MUFG Bank, Ltd. with a maximum facility of USD 100,000,000 (full amount). The loan interest rate uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 22 October 2024, 6 November 2024 and 3 December 2024, amounting to USD60,000,000, USD20,000,000 and USD20,000,000, respectively. This facility has a maximum maturity of 3 months from the date of withdrawal of each loan, namely on 22 January 2025, 6 February 2025 and 3 March 2025. As of 31 December 2024, the loan balance of the facility was USD100,000,000 (full amount) or equivalent to Rp1,609,500.

p) BNI, through BNI Hongkong branch, obtained a bilateral overseas loan facility with China Construction Bank (Asia) Corporation Limited with a maximum facility of USD100,000,000 (full amount). The loan interest rate uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 26 June 2024 and 26 July 2024, amounting to USD10,000,000 and USD90,000,000, respectively. This facility has a maximum maturity of 1 year from the date of withdrawal of each loan, namely on 26 June 2025 and 26 July 2025. As of 31 December 2024, the loan balance of the facility was USD100,000,000 (full amount) or equivalent to Rp1,609,500.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

q) BNI, melalui BNI cabang Hongkong memperoleh fasilitas pinjaman bilateral luar negeri dengan The Hongkong and Shanghai Banking Corporation Limited dengan maksimum fasilitas USD50.000.000 (nilai penuh). Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 27 Desember 2024 sebesar USD50.000.000 dan akan jatuh tempo pada 22 Desember 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar USD50,000,000 (nilai penuh) atau ekuivalen Rp804.750.

r) BNI, melalui BNI cabang Seoul memperoleh fasilitas pinjaman bilateral luar negeri dengan Shinhan Bank Co., Ltd. dengan maksimum fasilitas KRW30.000.000.000 (nilai penuh). Fasilitas ini telah digunakan pada tanggal 25 Juni 2024 sebesar KRW30.000.000.000. Fasilitas ini memiliki jatuh tempo maksimal 1 tahun sejak tanggal penarikan, yaitu pada tanggal 25 Mei 2025. Pada tanggal 31 Desember 2024, saldo pinjaman fasilitas tersebut adalah sebesar KRW30.000.000.000 (nilai penuh) atau ekuivalen Rp327.600.

Pinjaman penerusan

Pinjaman penerusan pada tanggal 31 Desember 2024 dan 2023 mencakup pinjaman penerusan dari *Kreditanstalt fur Wiederaufbau* untuk pembiayaan *Industrial Efficiency and Pollution Control Phase* I dan II yang diterima pada tahun 2001 dan 2004.

Berdasarkan Perjanjian Penerusan Pinjaman antara BNI dan Departemen Keuangan No. SLA-1145/DP3/2001 tertanggal 30 Maret 2001 dan SLA-1174/DP3/2004 tertanggal 25 Agustus 2004, Pemerintah telah menyetujui BNI sebagai bank pelaksana dengan jumlah fasilitas masing-masing tidak melebihi DM11.700.000 dan EUR9.000.000 (nilai penuh). Tanggal terakhir penarikan pinjaman adalah masing-masing pada tanggal 30 Juni 2001 dan 30 Desember 2007. Jangka waktu pinjaman penerusan ini adalah masing-masing selama 12 tahun termasuk masa tenggang 2 tahun dan 40 tahun termasuk masa tenggang 10 tahun.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

q) BNI, through BNI Hongkong branch, obtained a bilateral offshore loan facility with The Hongkong and Shanghai Banking Corporation Limited with a maximum facility of USD50,000,000 (full amount). The loan interest rate uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 27 December 2024 in the amount of USD50,000,000 and will mature on 22 December 2025. As of 31 December 2024, the loan balance of the facility is USD50,000,000 (full amount) or equivalent to Rp804,750.

r) BNI, through BNI Seoul branch, obtained a bilateral overseas loan facility with Shinhan Bank Co., Ltd. with a maximum facility of KRW30,000,000,000 (full amount). This facility has been used on 25 June 2024 in the amount of KRW30,000,000,000. This facility has a maximum maturity of 1 year from the date of withdrawal, namely on 25 May 2025. As of 31 December 2024, the loan balance of the facility was KRW30,000,000,000 (full amount) or equivalent to Rp327,600.

Two step loans

Two step loans as of 31 December 2024 and 2023 are step loans from Kreditanstalt fur Wiederaufbau to finance Industrial Efficiency and Pollution Control Phase I and II that was received in 2001 and 2004.

Based on the two step loans agreements between BNI and the Ministry of Finance No. SLA-1145/DP3/2001 dated 30 March 2001 and SLA-1174/DP3/2004 dated 25 August 2004, the Government appointed BNI as an executing bank with total facilities for each not exceeding DM11,700,000 and EUR9,000,000 (full amount). Latest withdrawal date were on 30 June 2001 and 30 December 2007, respectively. The terms of the two step loans are 12 years including 2 years grace period and 40 years including 10 years grace period, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman penerusan (lanjutan)

Pada tanggal 31 Desember 2024, saldo pinjaman penerusan untuk *Phase* I dan II adalah masing-masing sebesar Rp53 dan EUR2.883.000 (nilai penuh) atau ekuivalen Rp48.504 (31 Desember 2023: EUR3.030.000 (nilai penuh) atau ekuivalen Rp51.808).

Kredit likuiditas untuk kredit koperasi primer kepada anggotanya

Merupakan fasilitas kredit yang diperoleh dari Bank Indonesia terutama ditujukan untuk debitur BNI sehubungan dengan program kredit Pemerintah untuk pinjaman investasi usaha kecil, pinjaman modal kerja dan pinjaman pengusaha kecil. Sesuai dengan Peraturan Pemerintah, manajemen program kredit likuiditas telah dialihkan ke PT Permodalan Nasional Madani, Badan Usaha Milik Negara, yang akan jatuh tempo dalam beberapa tanggal, berdasarkan penyelesaian dari program-program tersebut.

Tingkat bunga atas fasilitas ini berkisar antara 3,00% sampai dengan 7,00% per tahun.

Bankers acceptance

Bankers acceptance merupakan pinjaman antarbank yang diperoleh BNI dari bank-bank luar negeri yang ditujukan untuk meningkatkan likuiditas dengan jangka waktu pinjaman 6 sampai dengan 12 bulan.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Two step loans** (continued)*

As of 31 December 2024, two step loans for Phase I and II amounted to Rp53 and EUR2,883,000 (full amount) or equivalent Rp48,504, respectively (31 December 2023: EUR3,030,000 (full amount) or equivalent Rp51,808).

Liquidity loan for members of primary cooperatives

This is a credit facility provided by Bank Indonesia specifically for BNI's debtors in relation to the Government's loan program for small investment loans, working capital loans and small business loans. In accordance with the Government Regulation, the management of this liquidity loan program was transferred to PT Permodalan Nasional Madani, a State-Owned Enterprise. The loan will mature on various dates based on the completion of such programs.

Interest rates on the facility range from 3.00% to 7.00% per annum.

Bankers acceptance

Bankers acceptance represents interbank borrowings for liquidity purposes obtained by BNI from various foreign banks with borrowing period of 6 until 12 months.

	2024	2023	
United Overseas Bank Ltd.	1,915,305	-	*United Overseas Bank Ltd.*
DZ Bank AG	888,180	-	*DZ Bank AG*
Mashreqbank PSC	563,325	-	*Mashreqbank PSC*
CoBank, *Singapore*	402,375	1,924,625	*CoBank, Singapore*
OCBC Ltd., *Singapore*	402,375	769,850	*OCBC Ltd., Singapore*
Emirates NBD Bank PJSC	-	3,079,400	*Emirates NBD Bank PJSC*
MUFG Bank, Hong Kong	-	769,850	*MUFG Bank Hong Kong*
The Korea Development Bank, *Singapore Branch*	-	769,850	*The Korea Development Bank, Singapore Branch*
Bank of America N.A., *Singapore*	-	454,212	*Bank of America N.A., Singapore*
	4,171,560	**7,767,787**	

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain

PT BNI Multifinance (BNIMF):

PT Bank Victoria International Tbk

Pada tanggal 25 Juli 2019, berdasarkan Perjanjian Kredit No. 20, PT Bank Victoria International Tbk setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp200.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa pembiayaan. Fasilitas pinjaman ini telah jatuh tempo pada 21 Desember 2023 dan diperpanjang sampai dengan 21 Desember 2024. Fasilitas ini telah jatuh tempo dan tidak diperpanjang.

Pada tanggal 17 Maret 2021, berdasarkan Perjanjian Kredit No. 39, PT Bank Victoria International Tbk setuju untuk memberikan tambahan fasilitas *fixed loan III line limit* sebesar Rp100.000 yang digunakan sebagai tambahan modal kerja pembiayaan, yang berlaku sampai dengan 17 Maret 2024. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

Tingkat suku bunga pinjaman berkisar antara 8,00% dan 8,00%-9,50% masing-masing untuk pencairan selama tahun 31 Desember 2024 dan 2023.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya, menjaga rasio *Non-Performing Finance* ("NPF") maksimal 5,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rpnihil dan Rp50.833.

PT Bank Mega Tbk

Pada tanggal 30 Maret 2021, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Mega Tbk dengan maksimum fasilitas sebesar Rp300.000 dengan jangka waktu pinjaman 60 bulan dan akan jatuh tempo pada tanggal 30 Maret 2026.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

Others

PT BNI Multifinance (BNIMF):

PT Bank Victoria International Tbk

On 25 July 2019, based on the Credit Agreement No. 20, PT Bank Victoria International Tbk agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp200,000 which was used as an additional working capital for consumer financing and finance lease. This facility has been matured on 21 December 2023 and extended until 21 December 2024. This facility has matured and was not renewed.

On 17 March 2021, based on the Credit Agreement No. 39, PT Bank Victoria International Tbk agreed to provide additional fixed loan III line limit facility amounting to Rp100,000 which was used as an additional working capital for financing that will mature on 17 March 2024. This facility had been repaid at maturity date and was not renewed.

Interest rate of the borrowing ranged from 8.00% and 8.00%-9.50% for withdrawal during 31 December 2024 and 2023, respectively.

During the loan period, the BNIMF has to comply with the terms of the loan agreement which include, maintaining Non-Performing Finance ("NPF") ratio at a maximum of 5.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rpnil and Rp50,833, respectively.

PT Bank Mega Tbk

On 30 March 2021, BNIMF obtained working capital loan facility from PT Bank Mega Tbk with maximum facility amounting to Rp300,000 and tenure of 60 months and will mature on 30 March 2026.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mega Tbk (lanjutan)

Tingkat suku bunga pinjaman adalah 8,75% masing-masing untuk pencairan selama tahun 31 Desember 2024 dan 2023.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp3.819 dan Rp30.625.

PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta

Pada tanggal 18 Oktober 2021, berdasarkan Perjanjian Kredit No. 19, PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta setuju untuk memberikan fasilitas pinjaman modal kerja tambahan dengan jumlah maksimum Rp50.000, yang berlaku hingga 26 September 2024. Selanjutnya, pada tanggal 16 Juni 2022, berdasarkan Addendum Pertama terhadap Perjanjian Kredit No. 48, PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta setuju untuk memperpanjang jangka waktu kredit hingga 26 September 2025.

Tingkat suku bunga pinjaman adalah 9,00% masing-masing untuk pencairan selama 31 Desember 2024 dan 2023.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio piutang pembiayaan terhadap total aset minimal 40,00%.
c. Menjaga rasio NPF maksimal 5,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp4.245 dan Rp12.244.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mega Tbk** (continued)*

Interest rate of the borrowing was 8.75% for withdrawal during 31 December 2024 and 2023, respectively.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp3,819 and Rp30,625, respectively.

PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta

On 18 October 2021, based on Credit Agreement No. 19, PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta agreed to provide an additional working capital loan facility with a maximum amount of Rp50,000, which is valid until 26 September 2024. Subsequently, on 16 June 2022, based on the First Addendum to Credit Agreement No. 48, PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta agreed to extend the credit term until 26 September 2025.

Interest rate of the borrowing was 9.00% for withdrawals during 31 December 2024 and 2023, respectively.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the financing to asset ratio at a minimum of 40.00%.
c. Maintaining NPF ratio at a maximum of 5.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp4,245 and Rp12,244, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Jtrust Indonesia Tbk

Pada tanggal 19 Desember 2020, Perusahaan memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Jtrust Indonesia Tbk dengan maksimum fasilitas sebesar Rp50.000 dengan jangka waktu pinjaman 48 bulan dan telah jatuh tempo pada tanggal 18 Desember 2024.

Pada tanggal 17 Februari 2022, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Jtrust Indonesia Tbk dengan maksimum fasilitas sebesar Rp200.000 dengan jangka waktu pinjaman 48 bulan dan akan jatuh tempo pada tanggal 17 Februari 2026.

Pada tanggal 22 Mei 2024 berdasarkan Akta No 10, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Jtrust Indonesia Tbk dengan maksimum fasilitas sebesar Rp300.000 dengan jangka waktu maksimal pinjaman hingga 60 bulan.

Perusahaan telah menggunakan fasilitas ini sebesar Rp220.000 pada tanggal 5 Juni 2024, 12 Juli 2024, 6 Agustus 2024, 4 September 2024, dan 10 Oktober 2024 masing-masing sebesar Rp50.000, Rp50.000, Rp50.000, Rp50.000, dan Rp20.000.

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 5 Juni 2028, 12 Juli 2028, 6 Agustus 2028, 4 September 2028, dan 10 Oktober 2028.

Tingkat suku bunga pinjaman adalah 7,50%-9,50% masing-masing untuk pencairan tanggal 31 Desember 2024 dan 2023.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Jtrust Indonesia Tbk

On 19 December 2020, the Company obtained working capital loan facility with PT Bank Jtrust Indonesia Tbk with maximum facility amounting to Rp50,000 and tenure of 48 months and has matured on 18 December 2024.

On 17 February 2022, BNIMF obtained working capital loan facility with PT Bank Jtrust Indonesia Tbk with maximum facility amounting to Rp200,000 and tenure of 48 months which will mature on 17 February 2026.

On 22 May 2024, based on the Credit Agreement No.10, BNIMF obtained working capital loan facility with PT Bank Jtrust Indonesia Tbk with maximum facility amounting to Rp300,000 and maximum tenure of 60 months.

The Company has utilised this facility amounted at Rp220,000 on 5 June 2024, 12 July 2024, 6 August 2024, 4 September 2024, and 10 October 2024 which each of the drawdown amounted to Rp50,000, Rp50,000, Rp50,000, Rp50,000 and Rp20,000.

This facility will mature maximum 48 months after the drawdown date, which is on 5 June 2028, 12 July 2028, 6 August 2028, 4 September 2028 and 10 October 2028.

Interest rate of the borrowing was 7.50%-9.50% for withdrawal during of 31 December 2024 and 2023, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Jtrust Indonesia Tbk (lanjutan)

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp203.573 dan Rp7.368.

PT Bank DKI

Pada tanggal 16 Juni 2022, berdasarkan Perjanjian kredit No. 48, PT Bank DKI setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan Rp50.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa pembiayaan yang berlaku sampai 22 September 2025.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *current ratio* minimal 1 kali.

b. Menjaga *gearing ratio* maksimal 10 kali.

c. Menjaga rasio piutang pembiayaan terhadap total aset minimal 40,00%.
d. Menjaga rasio NPF maksimal 5,00%.

Tingkat suku bunga pinjaman untuk pencairan selama tahun 2024 dan 2023 adalah 8,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp7.804 dan Rp16.043.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Jtrust Indonesia Tbk** (continued)*

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining NPF ratio at a maximum of 5.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp203,573 and Rp7,368, respectively.

PT Bank DKI

On 16 June 2022, based on the Credit Agreement No. 48, PT Bank DKI agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp50,000, which was used as an additional working capital for consumer financing and finance lease that will mature on 22 September 2025.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the current ratio at a minimum of 1 times.
b. Maintaining the gearing ratio at a maximum of 10 times.
c. Maintaining the financing to asset ratio at a minimum of 40.00%.
d. Maintaining NPF ratio at a maximum of 5.00%.

Interest rate of the borrowing for withdrawal during 2024 and 2023 was 8.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp7,804 and Rp16,043, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk

Pada tanggal 28 Agustus 2018, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan maksimum fasilitas sebesar Rp250.000 dengan jangka waktu pinjaman 60 bulan dan telah jatuh tempo pada tanggal 28 Agustus 2023. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

Pada tanggal 16 September 2019, berdasarkan Perjanjian Kredit No. 18, PT Bank Mandiri (Persero) Tbk setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp250.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan akan jatuh tempo pada tanggal 20 Februari 2024. Fasilitas ini telah dilunasi saat jatuh tempo dan tidak diperpanjang.

Pada tanggal 16 Maret 2020, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp250.000 dengan jangka waktu pinjaman 48 bulan sejak tanggal penarikan setiap fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp219.800 pada 26 Maret 2020, 8 April 2020, 29 April 2020, 6 Mei 2020, 5 Juni 2020, 26 Juni 2020, 27 Juli 2020, 8 September 2020, dan 14 September 2020 masing-masing sebesar Rp20.000, Rp15.000, Rp35.000, Rp30.000, Rp20.800, Rp8.500, Rp11.000, Rp52.000 dan Rp27.500.

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 26 Maret 2024, 8 April 2024, 28 April 2024, 6 Mei 2024, 5 Juni 2024, 26 Juni 2024, 27 Juli 2024, 8 September 2024, dan 14 September 2024. Fasilitas ini telah dilunasi saat jatuh tempo dan tidak diperpanjang.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Mandiri (Persero) Tbk

On 28 August 2018, BNIMF obtained working capital facility loan from PT Bank Mandiri (Persero) Tbk with maximum facility amounting to Rp250,000 and tenure of 60 months and has matured on 28 August 2023. This facility had been repaid at maturity date and was not renewed.

On 16 September 2019, based on the Credit Agreement No. 18, PT Bank Mandiri (Persero) Tbk agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp250,000 which was used as an additional working capital for consumer financing and will mature on 20 February 2024. This facility had been repaid at maturity date and was not renewed.

On 16 March 2020, BNIMF obtained additional working capital facility loan from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp250,000 and tenure of 48 months from the date of withdrawal of each credit facility.

BNIMF has used this facility amounting to Rp219,800 on 26 March 2020, 8 April 2020, 29 April 2020, 6 May 2020, 5 June 2020, 26 June 2020, 27 July 2020, 8 September 2020, and 14 September 2020, which each of the drawdown amounted to Rp20,000, Rp15,000, Rp35,000, Rp30,000, Rp20,800, Rp8,500, Rp11,000, Rp52,000 and Rp27,500.

This facility will mature maximum 48 months after the drawdown date, respectively on 26 March 2024, 8 April 2024, 28 April 2024, 6 May 2024, 5 June 2024, 26 June 2024, 27 July 2024, 8 September 2024, and 14 September 2024. This facility had been repaid at maturity date and was not renewed.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk

Pada tanggal 16 September 2021, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp250.000 dengan jangka waktu pinjaman 48 bulan sejak tanggal penarikan setiap fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp10.000 pada tanggal 21 September 2021 dan 22 April 2022 masing-masing sebesar Rp5.000.

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 21 September 2024 dan 22 April 2026.

Pada tanggal 22 Februari 2023, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp350.000 untuk jangka waktu pinjaman sampai dengan 60 bulan sejak tanggal penarikan setiap fasilitas, dengan menggunakan skema *revolving*.

BNIMF telah menggunakan fasilitas ini sebesar Rp367.000 pada tanggal 13 Maret 2023, 3 Mei 2023, 16 Mei 2023, 31 Mei 2023, 5 Juni 2023, 21 Juni 2023, 23 Juni 2023, 27 Juni 2023, 3 Juli 2023, 7 Juli 2023, 13 Juli 2023, 20 Juli 2023, 27 Juli 2023, 28 Juli 2023, 2 Agustus 2023, 7 Agustus 2023, 9 Agustus 2023, 14 Agustus 2023, 15 Agustus 2023, dan 16 Agustus 2023 masing-masing sebesar Rp20.000, Rp15.000, Rp35.000, Rp10.000, Rp25.000, Rp10.000, Rp33.000, Rp32.000, Rp35.000, Rp10.000, Rp15.000, Rp12.000, Rp20.000, Rp10.000, Rp10.000, Rp15.000, Rp15.000, Rp15.500, Rp12.500, dan Rp17.000.

Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 13 Maret 2025, 3 Mei 2025, 16 Mei 2025, 31 Mei 2025, 5 Juni 2025, 21 Juni 2025, 23 Juni 2025, 27 Juni 2025, 3 Juli 2026, 7 Juli 2025, 13 Juli 2026, 20 Juli 2026, 27 Juli 2026, 28 Juli 2025, 2 Agustus 2025, 7 Agustus 2026, 9 Agustus 2026, 14 Agustus 2025, 15 Agustus 2025, dan 16 Agustus 2026.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Mandiri (Persero) Tbk

On 16 September 2021, BNIMF obtained additional working capital facility loan from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp250,000 and tenure of 48 months from the date of withdrawal of each credit facility.

BNIMF has used this facility amounting to Rp10,000 on 21 September 2021 and 22 April 2022 which each of the drawdown amounted to Rp5,000.

This facility will mature maximum 48 months from the respective withdrawal date, namely 21 September 2024 and 22 April 2026.

On 22 February 2023, BNIMF obtained additional working capital facility loan from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp350,000 and tenure of 60 months from the date of withdrawal of each credit facility, using a revolving scheme.

BNIMF has used this facility amounting to Rp367,000 on 13 March 2023, 3 May 2023, 16 May 2023, 31 May 2023, 5 June 2023, 21 June 2023, 23 June 2023, 27 June 2023, 3 July 2023, 7 July 2023 , 13 July 2023, 20 July 2023, 27 July 2023, 28 July 2023, 2 August 2023, 7 August 2023, 9 August 2023, 14 August 2023, 15 August 2023, and 16 August 2023 which each of the drawdown amounted to Rp20,000, Rp15,000, Rp35,000, Rp10,000, Rp25,000, Rp10,000, Rp33,000, Rp32,000, Rp35,000, Rp10,000, Rp15,000, Rp12,000, Rp20,000, Rp10,000, Rp10,000, Rp15,000, Rp15,000, Rp15,500, Rp12,500 and Rp17,000.

This facility will mature maximum 60 months from the respective withdrawal date, respectively on 13 March 2025, 3 May 2025, 16 May 2025, 31 May 2025, 5 June 2025, 21 June 2025, 23 June 2025, 27 June 2025, 3 July 2026, 7 July 2025, 13 July 2026, 20 July 2026, 27 July 2026, 28 July 2025, 2 August 2025, 7 August 2026, 9 August 2026, 14 August 2025, 15 August 2025, and 16 August 2026.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

Pada tanggal 22 Februari 2023, BNIMF memperoleh tambahan fasilitas pinjaman kredit jangka pendek dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp150.000 dengan skema *revolving* dan jangka waktu pinjaman sampai dengan 12 bulan sejak tanggal penandatanganan perjanjian kredit. Fasilitas ini telah diperpanjang dan akan jatuh tempo pada tanggal 22 Februari 2025.

BNIMF telah melakukan penarikan atas fasilitas pinjaman ini sebesar Rp1.475.000 pada tanggal 31 Oktober 2023, 20 November 2023, 29 Februari 2024, 27 Maret 2024, 30 April 2024, 30 Mei 2024, 31 Mei 2024, 28 Juni 2024, 31 Juli 2024, 29 Agustus 2024, 30 September 2024, 31 Oktober 2024, 29 November 2024, 20 Desember 2024, dan 30 Desember 2024 masing-masing sebesar Rp80.000, Rp70.000, Rp75.000, Rp75.000, Rp75.000, Rp75.000, Rp75.000, Rp150.000, Rp150.000, Rp150.000, Rp100.000, Rp150.000, Rp100.000, Rp100.000, dan Rp50.000 yang jatuh tempo pada tanggal 8 November 2023, 20 Desember 2023, 27 Maret 2024, 22 April 2024, 6 Mei 2024, 3 Juni 2024, 4 Juni 2024, 5 Juli 2024, 2 Agustus 2024, 2 September 2024, 3 Oktober 2024, 4 November 2024, 3 Desember 2024, 24 Desember 2024, dan 3 Januari 2025.

Pada tanggal 16 Oktober 2023, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman sampai dengan 72 bulan sejak tanggal penandatanganan perjanjian kredit dengan skema revolving. Pada tanggal 22 Februari 2024, berdasarkan Addendum Perjanjian Kredit No.8, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp1.000.000 dengan jangka waktu pinjaman sampai dengan 60 bulan sejak tanggal penandatanganan perjanjian kredit dengan skema *revolving*.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

On 22 February 2023, BNIMF obtained additional short-term credit loan facility from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp150,000 with a revolving scheme and maximum tenure of 12 months from the date of the signing of Credit Agreement. This facility has been extended and will be matured on 22 February 2025.

BNIMF has utilised this facility amounted at Rp1,475,000 on 31 October 2023, 20 November 2023, 29 February 2024, 27 March 2024, 30 April 2024, 30 May 2024, 31 May 2024, 28 June 2024, 31 July 2024, 29 August 2024, 30 September 2024, 31 October 2024, 29 November 2024, 20 December 2024, and 30 December 2024 with respective amounts of Rp80,000, Rp70,000, Rp75,000, Rp75,000, Rp75,000, Rp75,000, Rp75,000, Rp150,000, Rp150,000, Rp150,000, Rp100,000, Rp150,000, Rp100,000, Rp100,000, and Rp50,000, which are due on 8 November 2023, 20 December 2023, 27 March 2024, 22 April 2024, 6 May 2024, 3 June 2024, 4 June 2024, 5 July 2024, 2 August 2024, 2 September 2024, 3 October 2024, 4 November 2024, 3 December 2024, 24 December 2024, and 3 January 2025.

On 16 October 2023, BNIMF obtained additional working capital loan facility from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp500,000 with a maximum tenure of 72 months from the date of the signing of credit agreement with revolving scheme. On 22 February 2024, based on the Addendum to the Credit Agreement No. 8, BNIMF obtained an additional working capital credit loan facility with PT Bank Mandiri (Persero) Tbk with a total facility of Rp1,000,000 with a loan term of up to 60 months from the date of signing the credit agreement with a revolving scheme.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

BNIMF telah menggunakan fasilitas ini sebesar Rp1.050.000 pada tanggal 18 Oktober 2023, 27 Oktober 2023, 13 November 2023, 21 November 2023, 30 November 2023, 4 Desember 2023, 22 Desember 2023, 28 Desember 2023, 10 Januari 2024, 18 Januari 2024, 5 Februari 2024, 27 Februari 2024, 22 Maret 2024, 28 Maret 2024, 2 April 2024, 22 April 2024, dan 8 Mei 2024 masing-masing sebesar Rp60.000, Rp40.000, Rp50.000, Rp25.000, Rp25.000, Rp25.000, Rp46.000, Rp29.000, Rp53.000, Rp47.000, Rp100.000, Rp150.000, Rp100.000, Rp100.000, Rp100.000, Rp50.000, dan Rp50.000.

Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 18 Oktober 2025, 27 Oktober 2026, 13 November 2025, 21 November 2025, 30 November 2025, 4 Desember 2025, 22 Desember 2025, 28 Desember 2026, 10 Januari 2027, 18 Januari 2028, 6 Februari 2028, 27 Februari 2027, 22 Maret 2027, 28 Maret 2027, 3 April 2027, 22 April 2027, dan 8 Mei 2028.

Pada tanggal 20 Juni 2024, BNIMF memperoleh fasilitas pinjaman kredit dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp750.000 dengan jangka waktu pinjaman sampai dengan 72 bulan sejak tanggal penandatanganan Perjanjian Kredit dengan skema *revolving*.

BNIMF telah menggunakan fasilitas ini sebesar Rp535.000 pada tanggal 25 Juni 2024, 27 Juni 2024, 28 Juni 2024, 17 Juli 2024, 22 Juli 2024, 29 Juli 2024, 31 Juli 2024, 15 Agustus 2024, 21 Agustus 2024, 30 Agustus 2024, 23 September 2024, 25 September 2024, 21 Oktober 2024, 25 Oktober 2024, 18 November 2024, 26 November 2024, 11 Desember 2024 dan 17 Desember 2024 masing-masing sebesar Rp35.000, Rp77.000, Rp15.000, Rp35.000, Rp40.000, Rp27.000, Rp26.000, Rp50.000, Rp45.000, Rp30.000, Rp20.000, Rp30.000, Rp15.000, Rp10.000, Rp20.000, Rp20.000, Rp15.000 dan Rp25.000.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

BNIMF has utilised this facility amounted at Rp1,050,000 on 18 October 2023, 27 October 2023, 13 November 2023, 21 November 2023, 30 November 2023, 4 December 2023, 22 December 2023, 28 December 2023, 10 January 2024, 18 January 2024, 5 February 2024, 27 February 2024, 22 March 2024, 28 March 2024, 2 April 2024, 22 April 2024, and 8 May 2024 which each of the drawdown amounted to Rp60,000, Rp40,000, Rp50,000, Rp25,000, Rp25,000, Rp25,000, Rp46,000, Rp29,000, Rp53,000, Rp47,000, Rp100,000, Rp150,000, Rp100,000, Rp100,000, Rp100,000, Rp50,000, and Rp50,000.

This facility will mature maximum 60 months from the respective withdrawal date, respectively on 18 October 2025, 27 October 2026, 13 November 2025, 21 November 2025, 30 November 2025, 4 December 2025, 22 December 2025, and 28 December 2026, 10 January 2027, 18 January 2028, 6 February 2028, 27 February 2027, 22 March 2027, 28 March 2027, 3 April 2027, 22 April 2027, and 8 May 2028.

On 20 June 2024, BNIMF obtained credit loan facility from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp750,000 with a maximum tenure of 72 months from the date of the signing of Credit Agreement with revolving scheme.

BNIMF has utilised this facility amounted at Rp535,000 on 25 June 2024, 27 June 2024, 28 June 2024, 17 July 2024, 22 July 2024, 29 July 2024, 31 July 2024, 15 Agustus 2024, 21 Agustus 2024, 30 Agustus 2024, 23 September 2024, 25 September 2024, 21 October 2024, 25 October 2024, 18 November 2024, 26 November 2024, 11 December 2024 and 17 December 2024 which each of the drawdown amounted to Rp35,000, Rp77,000, and Rp15,000, Rp35,000, Rp40,000, Rp27,000, Rp26,000, Rp50,000, Rp45,000, Rp30,000, Rp20,000, Rp30,000, Rp15,000, Rp10,000, Rp20,000, Rp20,000, Rp15,000 and Rp25,000.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 25 Juni 2028, 27 Juni 2028, 28 Juni 2028, 17 Juli 2028, 22 Juli 2028, 29 Juli 2028, 31 Juli 2028, 15 Agustus 2028, 21 Agustus 2028, 30 Agustus 2028, 23 September 2028, 25 September 2028, 21 Oktober 2028, 25 Oktober 2028, 18 November 2028, 26 November 2028, 11 Desember 2029, dan 17 Desember 2029.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

Tingkat suku bunga pinjaman berkisar antara 7,18%-8,00% dan 7,65%-9,00% masing-masing untuk pencairan selama tahun 31 Desember 2024 dan 2023.

Selama tahun 2023, BNIMF telah melakukan pembayaran pokok dan bunga atas fasilitas pinjaman dari PT Bank Mandiri (Persero) Tbk sebesar Rp576.810.

Pada tanggal 31 December 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp1.525.654 dan Rp772.307.

Dalam perjanjian-perjanjian fasilitas pinjaman yang disebutkan di atas, BNIMF diharuskan menjaga rasio-rasio keuangan dan memenuhi pembatasan-pembatasan tertentu termasuk tidak melebihi dari batas yang telah ditetapkan, antara lain, dalam hal melakukan pinjaman, pemberian piutang, pemberian jaminan atau ganti rugi, pelepasan aset, perubahan bisnis, akuisisi perusahaan dan bisnis, pengeluaran untuk barang modal, transaksi dengan afiliasi dan penghapusan piutang.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

This facility will mature maximum 48 months from the respective withdrawal date, respectively on 25 June 2028, 27 June 2028, 28 June 2028, 17 July 2028, 22 July 2028, 29 July 2028, 31 July 2028, 15 August 2028, 21 August 2028, 30 August 2028, 23 September 2028, 25 September 2028, 21 October 2028, 25 October 2028, 18 November 2028, 26 November 2028, 11 December 2029, and 17 December 2029.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the NPF ratio at a maximum of 5.00%.

Interest rate of the borrowing ranged from 7.18%-8.00% and 7.65%-9.00% for withdrawal during 31 December 2024 and 2023, respectively.

During 2023, BNIMF has paid interest and principal from loan facilities from PT Bank Mandiri (Persero) Tbk amounted to Rp576,810.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp1,525,654 and Rp772,307, respectively.

Under the above-mentioned loans facility agreements, BNIMF is required to maintain certain financial ratios and comply to certain restrictions including not exceeding established limits, such as, in areas of making any loans or granting any credit, giving any guarantee or indemnity, disposal of assets, changes in business, acquisition of other companies or businesses, capital expenditures, transactions with affiliates and write off of receivables.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Central Asia Tbk

Pada tanggal 22 Agustus 2023, BNIMF memperoleh fasilitas pinjaman kredit *Installment loan* dengan PT Bank Central Asia dengan maksimum fasilitas sebesar Rp105.000 dengan jangka waktu pinjaman 4 tahun sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp105.500 pada tanggal 23 Agustus 2023, 31 Agustus 2023, 7 September 2023, 19 September 2023, 26 September 2023, 6 Desember 2023, 16 Februari 2024, dan 20 Februari 2024 masing-masing sebesar Rp5.000, Rp10.000, Rp23.000, Rp11.500, Rp 7.000, Rp10.000, Rp19.500, dan Rp19.500.

Fasilitas ini memiliki jatuh tempo maksimal 4 tahun sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 23 Agustus 2026, 21 Agustus 2026, 7 September 2025, 1 September 2025, 20 September 2026, dan 27 November 2026, 21 Januari 2027, dan 31 Januari 2028.

Pada 6 Februari 2024, BNIMF memperoleh fasilitas pinjaman kredit *Installment loan* dengan PT Bank Central Asia Tbk dengan maksimum fasilitas sebesar Rp350.000 dengan jangka waktu pinjaman 4 tahun sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp95.000 pada tanggal 6 Februari 2024, 23 April 2024, 12 Juni 2024, dan 17 Oktober 2024 masing-masing sebesar Rp5.000, Rp20.000, Rp50.000, dan Rp20.000.

Fasilitas ini memiliki jatuh tempo maksimal 4 tahun sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 30 Januari 2028, 4 April 2026, 2 Juni 2027, dan 17 Oktober 2027.

Tingkat suku bunga pinjaman berkisar antara 7,88% dan 7,75% masing-masing untuk pencairan per 31 Desember 2024 dan 31 Desember 2023.

Pada tanggal 31 Desember 2024 dan 2023 saldo pinjaman fasilitas tersebut masing-masing sebesar Rp138.909 dan Rp59.938.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Central Asia Tbk

On 22 August 2023, BNIMF obtained Installment loan facility from PT Bank Central Asia with maximum facility amounting to Rp105,000 and tenure of 4 years from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp105,500 on 23 August 2023, 31 August 2023, 7 September 2023, 19 September 2023, 26 September 2023, 6 Desember 2023, 16 February 2024, and 20 February 2024 which each of the drawdown amounted to Rp5,000, Rp10,000, Rp23,000, Rp11,500, Rp7,000, Rp10,000, Rp19,500, and Rp19,500.

This facility will mature maximum 4 years after the drawdown date, respectively on 23 August 2026, 21 August 2026, 7 September 2025, 1 September 2025, 20 September 2026, 27 November 2026, 21 January 2027, and 31 January 2028.

On 6 February 2024, BNIMF obtained Installment loan facility from PT Bank Central Asia with maximum facility amounting to Rp350,000 and tenure of 4 years from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp95,000 on 6 February 2024, 23 April 2024, 12 June 2024, and 17 October 2024 which each of the drawdown amounted to Rp5,000, Rp20,000, Rp50,000 and Rp20,000.

This facility will mature maximum 4 years after the drawdown date, respectively on 30 January 2028, 4 April 2026, 2 June 2027, and 17 October 2027.

Interest rate of the borrowing ranged from 7.88%% and 7.75% for withdrawals as of 31 December 2024 and 31 December 2023.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp138,909 and Rp59,938 respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Digital BCA

Pada tanggal 13 Desember 2023, BNIMF memperoleh fasilitas pinjaman kredit *installment loan* dengan PT Bank Digital BCA dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman 4 tahun sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp100.000 pada tanggal 22 Desember 2023, 24 Januari 2024, 31 Januari 2024, dan 27 Mei 2024 masing-masing sebesar Rp4.500, Rp15.000, Rp30.500, and Rp50.000.

Fasilitas ini memiliki jatuh tempo maksimal 4 tahun sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 20 Desember 2027, 20 Januari 2027, 20 Januari 2027, dan 20 Mei 2028.

Pada 22 Juli 2024, BNIMF memperoleh fasilitas pinjaman kredit Installment loan dengan PT Bank Digital BCA Tbk dengan maksimum fasilitas sebesar Rp350.000 dengan jangka waktu pinjaman 5 tahun sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp107.000 pada tanggal 30 Agustus 2024, 3 Oktober 2024 , 8 November 2024 dan 4 Desember 2024, masing-masing sebesar Rp35.000, Rp35.000, Rp17.000 dan Rp20.000.

Fasilitas ini memiliki jatuh tempo maksimal 4 tahun sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 20 Agustus 2028, 20 September 2028, 20 Oktober 2027, dan 20 November 2027.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Digital BCA

On 13 December 2023, BNIMF obtained installment loan facility from PT Bank Digital BCA with maximum facility amounting to Rp100,000 and tenure of 4 years from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp100,000 on 22 December 2023, 24 January 2024, 31 January 2024, and 27 May 2024 which each of the drawdown amounted to Rp4,500, Rp15,000, Rp30,500, and Rp50,000.

This facility will mature maximum 4 years after the drawdown date, which is on 20 December 2027, 20 January 2027, 20 January 2027, and 20 May 2028.

On 22 July 2024, BNIMF obtained installment loan facility from PT Bank Digital BCA with maximum facility amounting to Rp350,000 and tenure of 5 years from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp107,000 on 30 August 2024, 3 October 2024, 8 November 2024, and 4 December 2024 which each of the drawdown amounted to Rp35,000, Rp35,000, Rp17,000, and Rp20,000.

This facility has a maximum maturity of 4 years from the date of withdrawal of each loan, namely on 20 August 2028, 20 September 2028, 20 October 2027 and 20 November 2027.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the NPF ratio at a maximum of 5.00%.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Digital BCA (lanjutan)

Tingkat suku bunga pinjaman adalah 7,88% dan 8,00% pada 31 Desember 2024 dan 2023.

Pada tanggal 31 Desember 2024 dan 2023 saldo pinjaman fasilitas tersebut masing-masing sebesar Rp178.076 dan Rp4.500.

PT Bank Panin Tbk

Pada tanggal 13 Oktober 2023, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Panin dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman 36 bulan atau 48 bulan sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp100.000 pada tanggal 23 November 2023, 5 Desember 2023, 19 Desember 2023 dan 5 Januari 2024 masing-masing sebesar Rp10.000, Rp25.000, Rp 30.000 dan Rp35.000.

Fasilitas ini memiliki jatuh tempo maksimal 36 bulan atau 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 23 November 2027, 4 Desember 2026, 18 Desember 2026 dan 5 Januari 2028.

Pada tanggal 21 Maret 2024, BNIMF memperoleh fasilitas pinjaman kredit tambahan dengan PT Bank Panin dengan maksimum fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman 36 bulan atau 48 bulan sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp320.000 pada tanggal 22 April 2024, 2 Mei 2024, 14 Mei 2024, 6 Juni 2024, 12 Juni 2024, 3 Juli 2024, 13 Agustus 2024, 3 Oktober 2024, dan 23 Desember 2024 masing-masing sebesar Rp30.000, Rp50.000, Rp50.000, Rp50.000, Rp30.000, Rp50.000, Rp30.000, Rp20.000, dan Rp10.000.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Digital BCA** (continued)*

Interest rate of the borrowing ranged from 7.88% and 8.00% during 31 December 2024 and 2023.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp178,076 and Rp4,500, respectively.

PT Bank Panin Tbk

On 13 October 2023, BNIMF obtained working capital loan facility from PT Bank Panin with maximum facility amounting to Rp100,000 and tenure of 36 months or 48 months from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp100,000 on 23 November 2023, 5 December 2023, 19 December 2023, and 5 January 2024 which each of the drawdown amounted to Rp10,000, Rp25,000, Rp30,000 and Rp35,000.

This facility will mature maximum 36 months or 48 month after the drawdown date, respectively on 23 November 2027, 4 December 2026, 18 December 2026 and 5 January 2028.

On 21 March 2024, BNIMF obtained additional credit loan facility from PT Bank Panin with maximum facility amounting to Rp500,000 and tenure of 36 months or 48 months from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp320,000 on 22 April 2024, 2 May 2024, 14 May 2024, 6 June 2024, 12 June 2024, 3 July 2024, 13 August 2024, 3 October 2024 and 23 December 2024 which each of the drawdown amounted to respectively amounting to Rp30,000, Rp50,000, Rp50,000, Rp50,000, Rp30,000, Rp50,000, Rp30,000, Rp20,000, and Rp10,000.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Panin Tbk (lanjutan)

Fasilitas ini memiliki jatuh tempo maksimal 36 dan 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 22 April 2028, 30 April 2027, 14 Mei 2027, 6 Juni 2028, 12 Juni 2028, 3 Juli 2028, 13 Agustus 2027, 3 Oktober 2028, dan 22 Desember 2028.

Tingkat suku bunga pinjaman berkisar antara 8,00% untuk pencairan selama tahun 2024.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut sebelum dikurangi biaya provisi masing-masing sebesar Rp347.118 dan Rp64.792.

PT Bank CTBC Indonesia

Pada tanggal 9 Oktober 2021, BNIMF telah mendapatkan modal kerja dari PT Bank CTBC Indonesia dengan total Rp125.000. Pada tanggal 9 Oktober 2023, fasilitas ini diperpanjang dan telah jatuh tempo pada tanggal 27 Oktober 2024.

Tingkat suku bunga pinjaman adalah 8,00% untuk pencairan selama 31 Desember 2024 dan 2023.

Pada tanggal 31 Desember 2024 dan 2023 saldo pinjaman fasilitas tersebut adalah masing-masing sebesar Rpnihil dan Rp10.000.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Panin Tbk** (continued)*

This facility will mature maximum 36 months and 48 months after the drawdown date, which is on 22 April 2028, 30 April 2028, 14 May 2027, 6 June 2028, 12 June 2028, 3 July 2028, 13 August 2027, 3 October 2028 and 22 December 2028.

Interest rate of the borrowing ranged from 8.00% for withdrawals during 2024.

Interest and principal have been paid by the BNIMF on schedule.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the NPF ratio at a maximum of 5.00%.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility before deducted by provision cost amounted to Rp347,118 and Rp64,792.

PT Bank CTBC Indonesia

On 9 October 2021, BNIMF has obtained a working capital loan facility from PT Bank CTBC Indonesia amounted at Rp125,000. On 9 October 2023, this facility has been extended and has matured on 27 October 2024.

Interest rate of the borrowing is 8.00% for withdrawal during 31 December 2024 and 2023.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rpnil and Rp10,000, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Danamon Indonesia

Pada tanggal 25 Februari 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Danamon Indonesia dengan maksimum fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman 48 bulan.

BNIMF telah menggunakan fasilitas ini sebesar Rp500.000 pada tanggal 13 Maret 2024, 4 April 2024, 25 April 2024, 2 Mei 2024, 30 Mei 2024, 24 Juni 2024, 3 Juli 2024, 5 Agustus 2024, dan 4 September 2024 masing-masing sebesar Rp100.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, dan Rp50.000.

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 13 Maret 2028, 4 April 2028, 25 April 2028, 2 Mei 2028, 30 Mei 2028, 24 Juni 2028, 3 Juli 2028, 5 Agustus 2028, dan 4 September 2028.

Tingkat suku bunga pinjaman adalah 8,00% untuk pencairan selama 31 Desember 2024.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a Menjaga *gearing ratio* maksimal 7 kali.

b Menjaga rasio NPF maksimal 3,00%.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp434.867 dan Rpnihil.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Danamon Indonesia

On 25 February 2024, BNIMF obtained working capital loan facility from PT Bank Danamon Indonesia with maximum facility amounting to Rp500,000 and tenure of 48 months.

BNIMF has utilised this facility amounted at Rp500,000 on 13 March 2024, 4 April 2024, 25 April 2024, 2 May 2024, 30 May 2024, 24 June 2024, 3 July 2024, 5 August 2024, and 4 September 2024 which each of the drawdown amounted to Rp100,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, and Rp50,000.

This facility will mature maximum 48 months after the drawdown date, which is on 13 March 2028, 4 April 2028, 25 April 2028, 2 May 2028, 30 May 2028, 24 June 2028, 3 July 2028, 5 August 2028, and 4 September 2028.

Interest rate of the borrowing was 8.00% for withdrawal during 31 December 2024.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 7 times.
b. Maintaining the NPF ratio at a maximum of 3.00%.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp434,867 and Rpnil, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Permata

Pada tanggal 20 Maret 2024, Perusahaan memperoleh fasilitas I pinjaman kredit modal kerja dengan PT Permata dengan maksimum fasilitas sebesar Rp400.000 dengan jangka waktu pinjaman 54 bulan.

BNIMF telah menggunakan fasilitas ini sebesar Rp130.000 pada tanggal 27 Juni 2024, 3 Juli 2024, dan 5 Agustus 2024 masing-masing sebesar Rp30.000, Rp50.000, dan Rp50.000.

Fasilitas ini memiliki jatuh tempo maksimal 36 bulan atau 48 bulan sejak tanggal penarikan masing-masing yaitu pada tanggal 27 Juni 2027, 3 Juli 2027, dan 5 Agustus 2027.

BNIMF memperoleh fasilitas II pinjaman kredit modal kerja dengan PT Bank Permata dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman sejak penandatanganan Perjanjian (PK) sampai 30 November 2025. BNIMF telah menggunakan fasilitas ini sebesar Rp 25.000 dan 10.000 pada tanggal 19 November 2024 dan 13 Desember 2024. Fasilitas ini memiliki jatuh tempo maksimal 7 hari pada tanggal 26 November 2024 dan 20 Desember 2024.

Tingkat suku bunga pinjaman adalah 8,00% untuk pencairan selama 31 Desember 2024.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp112.500 dan Rpnihil.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Permata

On 20 March 2024, the Company obtained working capital loan facility I from PT Bank Permata with maximum facility amounting to Rp400,000 and tenure of 54 months.

BNIMF has utilised this facility amounted at Rp130,000 on 27 June 2024, 3 July 2024, and 5 August 2024 which each of the drawdown amounted to Rp30,000, Rp50,000, and Rp50,000.

This facility will mature maximum 36 months or 48 month after the drawdown date, respectively on 27 June 2027, 3 July 2027, and 5 August 2027.

BNIMF obtained a working capital credit facility II with PT Bank Permata with a maximum facility of Rp100,000 with a loan term from the signing of the Agreement (PK) until November 30, 2025. BNIMF has used this facility for Rp25,000 and 10,000 on 19 November 2024 and 13 December 2024. This facility has a maximum maturity of 7 days on 26 November 2024 and 20 December 2024.

Interest rate of the borrowing ranged from 8.00% for withdrawals during 31 December 2024.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp112,500 and Rpnil, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Ganesha

Pada tanggal 22 Maret 2024, Perusahaan memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Ganesha dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman 4 tahun.

BNIMF telah menggunakan fasilitas ini sebesar Rp 100,000 pada tanggal 19 April 2024, 3 Mei 2024, dan 5 Juni 2024 masing-masing sebesar Rp30.000, Rp30.000, dan Rp40.000.

Fasilitas ini memiliki jatuh tempo maksimal 48 Bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 19 April 2028, 3 Mei 2028, dan 5 Juni 2028.

Tingkat suku bunga pinjaman adalah 8,00% untuk pencairan selama 31 Desember 2024.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga gearing ratio maksimal 8 kali.
b. Menjaga rasio NPF maksimal 3,00%.
c. Menjaga rasio piutang lancar minimal 85,00%.
d. Menjaga rasio piutang pembiayaan terhadap total aset minimal 40,00%.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp85.625 dan Rpnihil.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Ganesha

On 22 March 2024, the Company obtained working capital loan facility from PT Bank Ganesha with maximum facility amounting to Rp100,000 and tenure of 4 years.

BNIMF has utilised this facility amounted at Rp100,000 on 19 April 2024, 3 May 2024, and 5 June 2024 which each of the drawdown amounted to Rp30,000, Rp30,000, and Rp40,000.

This facility will mature maximum 48 months after the drawdown date, respectively on 19 April 2028, 3 May 2028, and 5 June 2028

Interest rate of the borrowing was 8.00% for withdrawal during 31 December 2024.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 8 times.
b. Maintaining the NPF ratio at a maximum of 3.00%.
c. Maintaining the Current Receivable ratio at a minimum of 85.00%
d. Maintaining the financing to assets ratio at a minimum of 40.00%

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp85,625 and Rpnil, respectively.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Jago Tbk

Pada tanggal 26 Juli 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Jago Tbk dengan maksimum fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman 72 bulan.

BNIMF telah menggunakan fasilitas ini sebesar Rp164.000 pada tanggal 31 Juli 2024, 22 Agustus 2024, 4 September 2024, 18 Oktober 2024, dan 12 November 2024 masing-masing sebesar Rp49.000, Rp25.000, Rp50.000, Rp15.000, dan Rp25.000.

Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing pinjaman yaitu pada tanggal 31 Juli 2029, 22 Agustus 2029, 4 September 2029, 18 Oktober 2029, dan 12 November 2029.

Tingkat suku bunga pinjaman adalah 7,75% untuk pencairan selama 31 Desember 2024.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp156.394 dan Rpnihil.

PT Bank Maybank Indonesia Tbk

Pada tanggal 21 Agustus 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Maybank Indonesia dengan maksimum fasilitas sebesar Rp450.000 dan Rp50.000 dengan jangka waktu pinjaman 60 bulan.

Tingkat suku bunga pinjaman adalah 7,90% untuk pencairan selama 31 Desember 2024.

BNIMF telah menggunakan fasilitas ini sebesar Rp40.000 pada tanggal 19 September 2024, Rp30.000 pada tanggal 4 November 2024, dan Rp 15.000 pada tanggal 10 Desember 2024.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Jago Tbk

On 26 July 2024, BNIMF obtained a working capital loan facility with PT Bank Jago Tbk with a maximum facility of Rp500,000 with a loan term of 72 months.

BNIMF has utilised this facility amounted at Rp164,000 on 31 July 2024, 22 August 2024, 4 September 2024, 18 October 2024, and 12 November 2024 which each of the drawdown amounted to Rp49,000, Rp25,000, Rp50,000, Rp15,000, and Rp25,000.

This facility will mature maximum 60 months after the drawdown date, respectively on 31 July 2029, 22 August 2029, 4 September 2029, 18 October 2029, and 12 November 2029.

Interest rate of the borrowing was 7.75% for withdrawal during 31 December 2024.

As of 31 December 2024 and 2023, the outstanding loan balance under this facility amounted to Rp156,394 and Rpnil, respectively.

PT Bank Maybank Indonesia Tbk

On 21 August 2024, BNIMF obtained working capital loan facility from PT Bank Maybank Indonesia Tbk with maximum facility amounting to Rp450,000 and Rp50,000 and tenure of 60 months.

Interest rate of the borrowing was 7.90% for withdrawal during 31 December 2024.

BNIMF has used this facility for Rp40,000 on 19 September 2024, Rp30,000 on 4 November 2024, and Rp15,000 on 10 December 2024.

31. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Maybank Indonesia Tbk (lanjutan)

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing yaitu pada tanggal 19 September 2028, 4 November 2028, dan 10 Desember 2028.

Pada tanggal 31 Desember 2024 dan 31 Desember 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp81.875 dan Rpnihil.

PT Bank of India Indonesia Tbk

Pada tanggal 15 October 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank of India Indonesia, berdasarkan Perjanjian Kredit No. 7 dengan maksimum fasilitas sebesar Rp200.000 dengan jangka waktu pinjaman 42 bulan.

Tingkat suku bunga pinjaman adalah 7,75% untuk pencairan selama 31 Desember 2024.

BNIMF telah menggunakan fasilitas ini sebesar Rp65.000 pada tanggal 24 Oktober 2024, 30 Oktober 2024, 28 November 2024, dan 16 Desember 2024 masing-masing sebesar Rp18.000, Rp12.000, Rp 20.000, dan Rp15.000.

Fasilitas ini memiliki jatuh tempo 36 bulan sejak tanggal penarikan masing-masing yaitu pada tanggal tanggal 24 Oktober 2027, 30 Oktober 2027, 28 November 2027 dan 16 Desember 2027.

Pada tanggal 31 Desember 2024 dan 2023, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp62.778 dan Rpnihil.

***31. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Maybank Indonesia Tbk** (continued)*

This facility will mature maximum 48 months after the drawdown date, respectively on 19 September 2028, 4 November 2028, and 10 December 2028.

As of 31 December 2024 and 31 December 2023, the outstanding loan balance under this facility amounted to Rp81,875 and Rpnil, respectively.

PT Bank of India Indonesia Tbk

On 15 October 2024, BNIMF obtained a working capital loan facility with PT Bank of India Indonesia, based on Credit Agreement No. 7, with a maximum facility amount of Rp200,000 and a loan term of 42 months.

Interest rate of the borrowing was 7.75% for withdrawal during 31 December 2024.

BNIMF has utilized this facility in the amount of Rp65,000 on 24 October 2024, 30 October 2024, 28 November 2024, and 16 December 2024, with amounts of Rp18,000, Rp12,000, and Rp20,000, and Rp15,000 respectively.

This facility has a maturity of 36 months from the date of each withdrawal, which is on 24 October 2027, 30 October 2027, 28 November 2027, and 16 December 2027.

As of 31 December 2024 and 2023, the loan balance of the facility was Rp62,778 and Rpnil respectively.

31. PINJAMAN YANG DITERIMA (lanjutan) / *31. BORROWINGS (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2024	2023	
Pihak berelasi			***Related parties***
Rupiah	1,525,707	772,360	*Rupiah*
Mata uang asing	48,504	51,808	*Foreign currencies*
Total pihak berelasi	1,574,211	824,168	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	1,385,376	260,142	*Rupiah*
Mata uang asing	39,971,857	29,865,298	*Foreign currencies*
Total pihak ketiga	41,357,233	30,125,440	*Total third parties*
	42,931,444	**30,949,608**	

c. Tingkat suku bunga per tahun / *c. Annual interest rates*

	Rupiah / *Rupiah* %	Dolar Amerika Serikat//*United States Dollar* %	*Dolar Singapura/ Singapore Dollar* %	*Won Korea Selatan/South Korean Won* %	*Dolar Australia/ Australian Dollar* %	*Euro Eropa/ European Euro* %	
2024	7.18 - 9.50	4.52 - 6.00	3.86	3.60	5.26	3.07 - 3.18	*2024*
2023	7.50 - 9.50	0.90 - 6.54	-	-	-	-	*2023*

32. EFEK-EFEK SUBORDINASI / *32. SUBORDINATED SECURITIES*

	2024		2023		
	Saldo/ *Balance*	Peringkat/ *Rating*	Saldo/ *Balance*	Peringkat/ *Rating*	
BNI *Tier* 2 *Subordinated Notes* setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.303 pada tanggal 31 Desember 2024 dan Rp2.287 pada tanggal 31 Desember 2023	8,046,197	Ba2**) BB***)	7,696,213	Ba2**) BB***)	*Subordinated Tier 2, net of unamortised issuance cost amounting to Rp1,303 as of 31 December 2024 and Rp2,287 as of 31 December 2023*
BNI *Additional Tier* 1 *Capital Securities* setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp4.014 pada tanggal 31 Desember 2024 dan Rp5.682 pada tanggal 31 Desember 2023	9,652,986	Ba3****)	9,232,518	Ba3****)	*Subordinated Additional Tier 1, net of unamortised issuance cost amounting to Rp4,014 as of 31 December 2024 and Rp5,682 as of 31 December 2023*
	17,699,183		**16,928,731**		

**) *Moody's Ba2*
***) *Fitch BB*
****) *Moody's Ba3*

32. EFEK-EFEK SUBORDINASI (lanjutan)

BNI *Tier 2 Subordinated Notes*

Pada tanggal 30 Maret 2021, BNI telah menerbitkan *Tier 2 Subordinated Notes (*BNI *Tier 2 Capital Bond* 2021*)* sebesar USD500 juta jangka waktu 5 tahun, dengan kupon sebesar 3,75% per tahun yang dibayarkan setiap semester, dan tercatat di *Singapore Exchange*. *Tier 2 Subordinated Notes* dapat dicatat sebagai komponen modal pelengkap (*Tier* 2) sesuai persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-64/PB.31/2021 tanggal 31 Maret 2021.

Pada tanggal 31 Desember 2024, BNI *Tier 2 Capital Bond* 2021 memiliki nilai bersih sebesar Rp8.046.197 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.303 (31 Desember 2023: Rp7.696.213).

Penggunaan dana hasil penerbitan *Tier 2 Subordinated Notes* digunakan oleh BNI untuk memperkuat modal pelengkap (*tier* 2) dan modal kerja dalam rangka pengembangan usaha terutama pemberian kredit serta peningkatan komposisi struktur dana jangka panjang, sesuai dengan Peraturan OJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum sebagaimana telah diubah dengan Peraturan OJK No. 34/POJK.03/2016 dan selanjutnya akan digunakan oleh BNI untuk mendukung peningkatan aset produktif.

Pada tanggal 31 Desember 2024 dan 2023, BNI telah memperoleh hasil pemeringkatan atas *Tier 2 Subordinated Notes* dari Moody's dan Fitch dengan peringkat masing-masing Ba2 dan BB.

Tier 2 Subordinated Notes ini dapat mengalami *write down* dan ditangguhkan pembayaran pokok dan bunganya apabila OJK menetapkan bahwa BNI berpotensi terganggu kelangsungan usahanya *(point of non-viability)* sesuai dengan peraturan OJK No. 11/POJK.03/2016 yang diubah dengan peraturan OJK No. 34/POJK.03/2016. *Point of non-viability* terjadi akibat bank mencapai *trigger level* pada indikator permodalan yang ditetapkan OJK, sesuai SEOJK No. 20/SEOJK.03/2016 Fitur Konversi Menjadi Saham Biasa atau *Write Down* terhadap Instrumen Modal Inti Tambahan dan Modal Pelengkap.

***32. SUBORDINATED SECURITIES** (continued)*

BNI Tier 2 Subordinated Notes

On 30 March 2021, BNI has issued Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) with total nominal value of USD500 million with the term of 5 years and coupon of 3.75% per annum paid on semi-annual basis, and listed in Singapore Exchange. Tier 2 Subordinated Notes can be treated as supplementary capital components (Tier 2) according to the approval from Financial Services Authority through letter No. S-64/PB.31/2021 dated 31 March 2021.

As of 31 December 2024, the net value of BNI Tier 2 Capital Bond 2021 was Rp8,046,197 after deducting unamortised issuance cost amounted Rp1,303 (31 December 2023: Rp7,696,213).

The proceeds from Tier 2 Subordinated Notes issuance was used by BNI to strengthen tier 2 capital and working capital in the context of business development, especially loan disbursement and increase in the composition of the long-term fund structure, in accordance with OJK Regulation No. 11/POJK.03/2016 concerning the Minimum Capital Requirement for Commercial Banks as amended by OJK Regulation No. 34/POJK.03/2016 and will then be used by BNI to support increase in productive assets.

As of 31 December 2024 and 2023, BNI obtained the rating of Tier 2 Subordinated Notes from Moody's and Fitch with Ba2 and BB rating, respectively.

This Tier 2 Subordinated Notes can experience write down and the payment of principal and interest will be postponed if the OJK stipulates that BNI has the potential to be subject to business continuity issues (point of non-viability) in accordance with OJK regulations No. 11/POJK.03/2016 amended by OJK regulation No. 34/POJK.03/2016. Point of non-viability occurs due to a bank achieving a trigger level in the capital indicator set by OJK, according to SEOJK No. 20/SEOJK.03/2016 Conversion Features into Common Shares or Write Down of Additional Core Capital Instruments and Supplementary Capital.

32. EFEK-EFEK SUBORDINASI (lanjutan)

BNI *Additional Tier 1 Capital Securities*

Pada tanggal 24 September 2021, BNI telah menerbitkan *Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021*) sebesar nilai nominal USD600 juta dan tidak memiliki jangka waktu, dengan opsi *call* 5,5 tahun, dengan kupon sebesar 4,30% per tahun yang dibayarkan setiap semester, dan tercatat di *Singapore Exchange*. *Additional Tier 1 Capital Securities* dapat dicatat sebagai komponen modal inti tambahan (*Additional Tier 1*) sesuai persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-210/PB.31/2021 tanggal 30 September 2021.

Pada tanggal 31 Desember 2024, BNI *Additional Tier 1 Capital Bond* 2021 memiliki nilai bersih sebesar Rp9.652.986 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp4.014 (31 Desember 2023: Rp9.232.518).

Pada tanggal 31 Desember 2024 dan 2023, BNI telah memperoleh hasil pemeringkatan atas *Additional Tier 1 Capital Securities* dari Moody's Ba3.

Additional Tier 1 Capital Securities yang diterbitkan telah mengikuti persyaratan POJK No. 11/POJK.03/2016 (Pasal 15) sehingga instrumen keuangan tersebut dapat dikategorikan sebagai Modal Inti Tambahan (*Additional Tier 1*). Namun, terdapat klausul *mandatory redemption - redemption for a capital trigger event* ketika CAR BNI mencapai rasio tertentu maka Bank harus melakukan pelunasan terhadap sisa pokok dan bunga dari AT-1. Oleh karena itu, Bank mencatat BNI *Additional Tier 1 Capital Securities* ini sebagai instrumen liabilitas pada laporan keuangan konsolidasian.

Additional Tier 1 Capital Securities ini dapat mengalami *write down* dan ditangguhkan pembayaran pokok dan bunganya apabila OJK menetapkan bahwa BNI berpotensi terganggu kelangsungan usahanya *(point of non-viability)* sesuai dengan peraturan OJK No. 11/POJK.03/2016 yang diubah dengan peraturan OJK No. 34/POJK.03/2016. *Point of non-viability* terjadi akibat bank mencapai *trigger level* pada indikator permodalan yang ditetapkan OJK, sesuai SEOJK No. 20/SEOJK.03/2016 Fitur Konversi Menjadi Saham Biasa atau *Write Down* terhadap Instrumen Modal Inti Tambahan dan Modal Pelengkap.

***32. SUBORDINATED SECURITIES** (continued)*

BNI Additional Tier 1 Capital Securities

On 24 September 2021, BNI has issued Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021) with total nominal value of USD600 million perpetual non callable 5.5 years and coupon of 4.30% per annum paid on semi-annual basis, and listed in Singapore Exchange. Additional Tier 1 Capital Securities can be treated as supplementary capital components (Additional Tier 1) according to the approval from Financial Services Authority through letter No. S-210/PB.31/2021 dated 30 September 2021.

As of 31 December 2024, the net value of BNI Additional Tier 1 Capital Bond 2021 was Rp9,652,986 after deducting unamortised issuance cost amounted Rp4,014 (31 December 2023: Rp9,232,518).

As of 31 December 2024 and 2023, BNI obtained the rating of Additional Tier 1 Capital Securities from Moody's with Ba3 rating.

Additional Tier 1 Capital Securities issued has comply in accordance with OJK Regulation No. 11/POJK.03/2016 (Article 15) hence the financial instrument can be categorised as supplementary capital components (Additional Tier 1). However, there is a mandatory redemption clause - redemption for a capital trigger event when BNI's CAR reaches a certain ratio, the Bank shall pay off the remaining principal and interest from AT-1. Therefore, the Bank recorded this BNI Additional Tier 1 Capital Securities as a liability instrument in the consolidated financial statements.

This Additional Tier 1 Capital Securities can experience write down and the payment of principal and interest will be postponed if the OJK stipulates that BNI has the potential to be subject to business continuity issues (point of non-viability) in accordance with OJK regulations No. 11/POJK.03/2016 amended by OJK regulation No. 34/POJK.03/2016. Point of non-viability occurs due to a bank achieving a trigger level in the capital indicator set by OJK, according to SEOJK No. 20/SEOJK.03/2016 Conversion Features into Common Shares or Write Down of Additional Core Capital Instruments and Supplementary Capital.

33. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR

Modal saham

Pada tanggal-tanggal 31 Desember 2024 dan 2023, kepemilikan modal saham BNI adalah sebagai berikut:

33. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL

Share capital

As of 31 December 2024 and 2023, BNI's share capital ownership are as follows:

	2024			
Pemegang saham	**Jumlah lembar saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan (%)/ *Percentage of ownership (%)***	**Jumlah/ *Amount***	***Shareholders***
Saham Seri A Dwiwarna				*Class A Dwiwarna share*
Negara Republik Indonesia	1	-	-	*Republic of Indonesia*
Saham Seri B				*Class B shares*
Negara Republik Indonesia	434,012,799	1.16	1,627,548	*Republic of Indonesia*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	144,670,934	0.39	542,516	*Public (ownership less than 5% each)*
Total saham Seri B	578,683,733	1.55	2,170,064	*Total Class B shares*
Saham Seri C				*Class C shares*
Negara Republik Indonesia	21,944,374,950	58.84	4,114,570	*Republic of Indonesia*
Perseroan terbatas (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	1,207,509,576	3.24	226,408	*Limited liability company (ownership less than 5% each)*
Badan usaha asing (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	9,786,139,529	26.24	1,834,901	*Foreign investment entities (ownership less than 5% each)*
Putrama Wahju Setyawan (Direktur)	3,879,526	0.01	727	*Putrama Wahju Setyawan (Director)*
Royke Tumilaar (Direktur)	3,656,941	0.01	686	*Royke Tumilaar (Director)*
Ronny Venir (Direktur)	3,539,596	0.01	664	*Ronny Venir (Director)*
Corina Leyla Karnalies (Direktur)	3,506,474	0.01	657	*Corina Leyla Karnalies (Director)*
Novita Widya Anggraini (Direktur)	3,143,884	0.01	589	*Novita Widya Anggraini (Director)*
David Pirzada (Direktur)	2,859,984	0.01	536	*David Pirzada (Director)*
Mucharom (Direktur)	2,541,148	0.01	476	*Mucharom (Director)*
Toto Prasetyo (Direktur)	2,163,696	0.01	406	*Toto Prasetyo (Director)*
Askolani (Komisaris)	1,752,462	0.00	329	*Askolani (Commissioner)*
Fadlansyah Lubis (Komisaris)	986,860	0.00	185	*Fadlansyah Lubis (Commissioner)*
Hussein Paolo Kartadjoemena (Direktur)	918,611	0.00	172	*Hussein Paolo Kartadjoemena (Director)*
Robertus Billitea (Komisaris)	864,066	0.00	162	*Robertus Billitea(Commissioner)*
Pahala Nugraha Mansury (Komisaris)	677,291	0.00	127	*Pahala Nugraha Mansury (Commissioner)*
I Made Sukajaya (Direktur)	576,912	0.00	108	*I Made Sukajaya (Director)*
Agung Prabowo (Direktur)	101,356	0.00	19	*Agung Prabowo (Director)*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	3,749,436,320	10.05	703,021	*Public (ownership less than 5% each)*
Total saham Seri C	36,718,629,182	98.45	6,884,743	*Total Class C shares*
Total	**37,297,312,916**	**100.00**	**9,054,807**	***Total***
Saham treasuri	-		-	*Treasury shares*

33. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

33. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL (continued)

Modal saham (lanjutan)

***Share Capital** (continued)*

	2023			
Pemegang saham	**Jumlah lembar saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan (%)/ *Percentage of ownership (%)***	**Jumlah/ *Amount***	***Shareholders***
Saham Seri A Dwiwarna				*Class A Dwiwarna share*
Negara Republik Indonesia	1	-	-	*Republic of Indonesia*
Saham Seri B				*Class B shares*
Negara Republik Indonesia	434,012,799	1.16	1,627,548	*Republic of Indonesia*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	144,670,934	0.39	542,516	*Public (ownership less than 5% each)*
Total saham Seri B	578,683,733	1.55	2,170,064	*Total Class B shares*
Saham Seri C				*Class C shares*
Negara Republik Indonesia	21,944,374,950	58.90	4,114,570	*Republic of Indonesia*
Perseroan terbatas (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	1,668,794,017	4.48	312,899	*Limited liability company (ownership less than 5% each)*
Badan usaha asing (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	10,119,917,947	27.16	1,897,485	*Foreign investment entities (ownership less than 5% each)*
Putrama Wahju Setyawan (Direktur)	1,686,386	0.00	316	*Putrama Wahju Setyawan (Director)*
Sis Apik Wijayanto (Direktur)	1,579,946	0.00	296	*Sis Apik Wijayanto (Director)*
Adi Sulistyowati (Direktur)	905,706	0.00	170	*Adi Sulistyowati (Director)*
Ronny Venir (Direktur)	1,559,656	0.00	292	*Ronny Venir (Director)*
Corina Leyla Karnalies (Direktur)	1,442,034	0.00	270	*Corina Leyla Karnalies (Director)*
Royke Tumilaar (Direktur)	1,115,346	0.00	209	*Royke Tumilaar (Director)*
Muhammad Iqbal (Direktur)	948,044	0.00	178	*Muhammad Iqbal (Director)*
Novita Widya Anggraini (Direktur)	948,044	0.00	178	*Novita Widya Anggraini (Director)*
Silvano Winston Rumantir (Direktur)	948,044	0.00	178	*Silvano Winston Rumantir (Director)*
David Pirzada (Direktur)	880,044	0.00	165	*David Pirzada (Director)*
Askolani (Komisaris)	809,086	0.00	152	*Askolani (Commissioner)*
Susyanto (Komisaris)	634,594	0.00	119	*Susyanto (Commissioner)*
Mucharom (Direktur)	348,008	0.00	65	*Mucharom (Director)*
Toto Prasetyo (Direktur)	89,856	0.00	17	*Toto Prasetyo (Director)*
Fadlansyah Lubis (Komisaris)	43,484	0.00	8	*Fadlansyah Lubis (Commissioner)*
Robertus Billitea (Komisaris)	42,400	0.00	8	*Robertus Billitea(Commissioner)*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	2,931,046,990	7.87	549,571	*Public (ownership less than 5% each)*
Total saham Seri C	36,678,114,582	98.45	6,877,146	*Total Class C shares*
Total	**37,256,798,316**	**100.00**	**9,047,210**	***Total***
Saham treasuri	40,514,600		7,596	*Treasury shares*

33. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

Modal saham (lanjutan)

Saham Seri A Dwiwarna adalah saham yang memberikan hak-hak preferen kepada pemegangnya untuk menyetujui pengangkatan dan pemberhentian Komisaris dan Direksi, perubahan Anggaran Dasar, menyetujui pembubaran dan likuidasi, penggabungan, dan pengambil alihan BNI dan semua hak-hak lainnya yang dimiliki saham Seri B dan saham Seri C. Saham Seri A Dwiwarna tidak dapat dialihkan kepada pihak lain.

Saham Seri B dan Saham Seri C adalah saham biasa atas nama yang memiliki hak yang sama.

Pada tanggal 13 Agustus 2007, Pemerintah Republik Indonesia, melakukan divestasi sebesar 3.475.231.980 saham Seri C, mewakili 22,54% dari kepemilikan di BNI melalui Penawaran Umum Saham Kedua.

Sesuai Keterbukaan Informasi dalam upaya stabilisasi harga pasar saham di tengah kondisi perekonomian regional dan global yang mengalami tekanan dan perlambatan, Bank telah melakukan Pembelian Kembali Saham Perseroan yang telah dikeluarkan dan tercatat di Bursa Efek Indonesia (“BEI”). Program ini mengacu pada Peraturan OJK No. 2/POJK.04/2013 tanggal 26 Agustus 2013 tentang Pembelian Kembali Saham yang Dikeluarkan oleh Emiten atau Perusahaan Publik dalam Kondisi Pasar yang Berfluktuasi Secara Signifikan (“POJK No. 2/POJK.04/2013”) dan Surat Edaran OJK No. 3/SEOJK.04/2020 tanggal 9 Maret 2020 tentang Kondisi Lain sebagai Kondisi Pasar yang Berfluktuasi Secara Signifikan dalam Pelaksanaan Pembelian Kembali Saham yang Dikeluarkan oleh Emiten atau Perusahaan Publik.

Pembelian kembali saham Bank telah dilaksanakan pada tanggal 22 Juli 2021 sampai dengan 21 Oktober 2021, sesuai dengan tanggal Keterbukaan Informasi. Bank melakukan pembelian kembali Saham Seri C sejumlah 246.826 lot atau sebanyak 24.682.600 lembar saham dengan rata-rata biaya perolehan rata-rata sebesar Rp5.186,90 (nilai penuh) per lembar saham.

Pada tahun 2022, Bank melakukan alokasi saham treasuri senilai Rp207.475 sebagai Program Kepemilikan Saham bagi Manajemen dan Pegawai Bank dalam bentuk Saham Bonus (lihat Catatan 43).

33. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL *(continued)*

Share capital *(continued)*

The Class A Dwiwarna share is a share that gives the holder preferred rights to approve the appointment and dismissal of Commissioners and Directors, amend the Articles of Association, approve the dissolution and liquidation, merger, and takeover of BNI and all other rights of Class B and Class C shares. The Class A Dwiwarna share may not be transferred to other parties.

Class B and Class C shares are ordinary shares that have the same rights.

On 13 August 2007, the Government of the Republic of Indonesia divested 3,475,231,980 Class C shares, representing 22.54% of shareholding in BNI through a Second Initial Public Offering (IPO).

In accordance with the Disclosure of Information in relation to the stabilisation of stock market price amidst stressful and slowing regional and global economy, the Bank repurchased shares issued by the Bank listed in the Indonesia Stock Exchange ("IDX"). This program is consistent with Regulation of Financial Services Authority ("OJK") No. 2/POJK.04/2013 dated 26 August 2013 on the Repurchase of Shares Issued by the Issuers or Public Companies in Significant Fluctuating Market Conditions ("POJK No. 2/POJK.04/2013") and OJK Circular Letter No. 3/SEOJK.04/2020 dated 9 March 2020 on Other Conditions as Significant Fluctuating Market Conditions in the Implementation of Shares Buyback Issued by Issuers or Public Companies.

The repurchase of shares was executed on 22 July 2021 to 21 October 2021, consistent with the date of Disclosure of Information. The Bank repurchased 246,826 lots of Class C Shares, or 24,682,600 shares with an average acquisition cost amounting to Rp5,186.90 (full amount) per share.

In 2022, the Bank has allocated the treasury shares amounting Rp207,475 as Share Ownership Program for Management and Bank’s Employees in the form of Share Bonus (refer to Note 43).

33. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

Modal saham (lanjutan)

Pembelian kembali saham Bank telah dilaksanakan pada tanggal 12 Juli 2023 sampai dengan 1 Agustus 2023. Bank melakukan pembelian kembali Saham sejumlah 202.573 lot atau sebanyak 20.257.300 lembar saham dengan rata-rata biaya perolehan rata-rata sebesar Rp8.883,71 (nilai penuh) per lembar saham.

Pemecahan nilai nominal saham BNI

Berdasarkan keputusan RUPSLB tanggal 19 September 2023 yang dituangkan dalam Akta No. 18, tanggal 19 September 2023, yang dibuat dihadapan Ashoya Ratam S.H., M.KN, pemegang saham BNI antara lain menyetujui pemecahan nilai nominal saham *(stock split)* Bank dengan rasio 1:2 yang berlaku efektif pada tanggal 10 Oktober 2023. Sehingga:

a. Nilai nominal per Saham Seri A Dwiwarna dan Seri B dari sebesar Rp7.500 (nilai penuh) menjadi Rp3.750 (nilai penuh) dengan ketentuan:
   i. 1 (satu) saham Seri A Dwiwarna tetap dipertahankan sebagai saham Seri A Dwiwarna milik Negara Republik Indonesia dengan nilai nominal sebesar Rp3.750 (nilai penuh); dan
   ii. 1 (satu) saham Seri A Dwiwarna menjadi 1 (satu) saham saham Seri B milik Negara Republik Indonesia dengan nilai nominal sebesar Rp3.750 (nilai penuh).
b. Nilai nominal per Saham Seri C dari Rp375 (nilai penuh) menjadi Rp187,5 (nilai penuh).

Modal ditempatkan setelah pemecahan nilai nominal saham (*stock split*) berubah menjadi sebagai berikut:
a. Saham Seri A Dwiwarna - 1 lembar saham
b. Saham Seri B - 578.683.733 lembar saham
c. Saham Seri C - 36.678.114.582 lembar saham

***33. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL** (continued)*

***Share capital** (continued)*

The repurchase of shares was executed on 12 July 2023 to 1 August 2023. The Bank repurchased 202,573 lots, or 20,257,300 shares with an average acquisition cost amounting to Rp8,883.71 (full amount) per share.

Stock split of BNI

Based on the decision of the Extraordinary General Meeting of Shareholders (RUPSLB) dated 19 September 2023, as stated in Deed No. 18 dated 19 September 2023, as recorded in the Notarial Deed of Ashoya Ratam, S.H., M.KN., the shareholders of BNI, among others, approved the nominal value split (stock split) of the bank with a ratio of 1:2, effective from 10 October 2023. Therefore:

a. The nominal value per Series A Dwiwarna and Series B shares, originally Rp7,500 (full amount), split to Rp3,750 (full amount), with the following conditions:
   i. 1 (one) Series A Dwiwarna share is retained as a full-nominal value Series A Dwiwarna share owned by the Republic of Indonesia with a nominal value of Rp3,750 (full amount); and
   ii. 1 (one) Series A Dwiwarna share is converted into 1 (one) Series B share owned by the Republic of Indonesia with a nominal value of Rp3,750 (full amount).
b. The nominal value per Series C share is split from Rp375 (full amount) to Rp187.5 (full amount).

The issued capital after the nominal value split (stock split) changed as follows:

a. Series A Dwiwarna shares - 1 share
b. Series B shares - 578,683,733 shares
c. Series C shares - 36,678,114,582 shares.

33. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

33. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL (continued)

Tambahan modal disetor

Additional paid in capital

Perubahan tambahan modal disetor adalah sebagai berikut:

The movements in additional paid in capital are as follows:

Saldo pada tanggal 1 Januari 2010	591,156	*Balance as of 1 January 2010*
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas I pada tahun 2000 (lihat Catatan 1c)	56,883,826	*Additional paid in capital due to Right Issue I in 2000 (refer to Note 1c)*
	57,474,982	
Pengurangan tambahan modal disetor akibat pengembalian dana rekapitalisasi kepada pemerintah Indonesia (lihat Catatan 1d)	(581,474)	*Reduction of paid in capital due to refund of excess recapitalization funds to the Government of Indonesia (refer to Note 1d)*
	56,893,508	
Dieliminasi dengan akumulasi kerugian dalam rangka kuasi-reorganisasi per tanggal 30 Juni 2003 (lihat Catatan 1e)	(54,367,847)	*Elimination against accumulated losses in relation to the quasi-reorganization as of 30 June 2003 (refer to Note 1e)*
	2,525,661	
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas II pada tahun 2007 (lihat Catatan 1f)	3,287,218	*Additional paid in capital due to Right Issue II in 2007 (refer to Note 1f)*
Biaya emisi penerbitan saham	(195,280)	*Shares issuance cost*
	5,617,599	
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas III pada tahun 2010 (lihat Catatan 1g)	9,196,100	*Additional paid in capital due to Right Issue III in 2010 (refer to Note 1g)*
Biaya emisi penerbitan saham	(245,231)	*Shares issuance cost*
	14,568,468	
Tambahan modal disetor akibat penyertaan saham pada PT Bank Syariah Indonesia Tbk pada tahun 2021	2,441,786	*Additional paid in capital due to equity investment at PT Bank Syariah Indonesia Tbk in 2021*
	17,010,254	

34. PENGGUNAAN LABA BERSIH

34. APPROPRIATION OF NET INCOME

Berdasarkan keputusan Rapat Umum Pemegang Saham Tahunan tanggal 4 Maret 2024 dan 15 Maret 2023, pengalokasian laba bersih masing-masing untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

In accordance with the resolutions of the Annual General Shareholders' Meetings held on 4 March 2024 and 15 March 2023, the allocation of the net income for the years ended 31 December 2023 and 2022, respectively, are as follows:

	2023	**2022**	
Pembagian dividen	10,454,738	7,324,821	*Distribution of dividends*
Saldo laba	10,454,738	10,987,233	*Retained earnings*
	20,909,476	**18,312,054**	

Rapat Umum Pemegang Saham telah menyetujui pembagian dividen dari laba bersih tahun 2023 dan 2022, sebesar Rp10.454.738 pada tanggal 4 Maret 2024 dan Rp7.324.821 pada tanggal 15 Maret 2023.

General Shareholders' meeting has approved the dividend distribution of Rp10,454,738 and Rp7,324,821 from the 2023 net income on 4 March 2024 and 2022 net income on 15 March 2023.

35. CADANGAN UMUM DAN WAJIB

Cadangan umum dan wajib pada awalnya dibentuk dalam rangka memenuhi ketentuan Pasal 61 ayat (1) Undang-undang No. 1/1995 mengenai Perseroan Terbatas (kemudian diganti dengan Undang-undang Perseroan Terbatas No. 40/2007 pasal 70), yang mengharuskan perusahaan Indonesia untuk membuat penyisihan cadangan umum dan wajib sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-undang tersebut tidak mengatur jangka waktu untuk pembentukan penyisihan tersebut.

35. GENERAL AND LEGAL RESERVES

The general and legal reserves were originally provided in accordance with Indonesian Limited Liability Company Law No. 1/1995 article 61 paragraph (1) (later superseded by Limited Liability Company Law No. 40/2007 article 70), which requires Indonesian companies to set up a general and legal reserve amounting to at least 20% of the issued and paid-up share capital. This particular law does not regulate the period of time in relation to the provision of such reserves.

36. CADANGAN KHUSUS

Cadangan khusus terdiri dari cadangan yang dibentuk dalam rangka tujuan investasi dan *legal reserve* dari cabang luar negeri.

Sehubungan dengan adanya penerapan Peraturan Otoritas Jasa Keuangan (POJK) No. 34/POJK.03/2016 tanggal 22 September 2016 tentang Perubahan atas POJK No. 11/POJK.03/2016 tentang "Kewajiban Penyediaan Modal Minimum" yang mulai berlaku pada tanggal 26 September 2016 ("tanggal diberlakukannya"), untuk menjaga struktur permodalannya, Bank telah melakukan reklasifikasi atas saldo laba yang sudah ditentukan penggunaannya (cadangan khusus) sebesar Rp5.613.100 dan cadangan cabang luar negeri sebesar Rp92.276 per 31 Desember 2016, menjadi laba ditahan yang tidak ditentukan penggunaannya.

Reklasifikasi atas saldo laba tersebut telah mendapatkan persetujuan melalui berita acara Rapat Umum Pemegang Saham Tahunan No. 42 tanggal 16 Maret 2017.

36. SPECIFIC RESERVES

Specific reserves consist of reserve for investment purposes and legal reserve from overseas branches.

In relation with implementation of Regulation of the Financial Services Regulatory Authority (POJK) No. 34/POJK.03/2016 dated 22 September 2016 on Amendments to POJK No. 11/POJK.03/2016 concerning "Minimum Capital Requirement for Commercial Bank" which came into force on 26 September 2016 ("date of enactment"), to maintain its capital structure, the Bank has reclassified retained earnings that has been appropriated (specific reserve) amounting to Rp5,613,100 and reserve of overseas branch amounting to Rp92,276 as of 31 December 2016 into the unappropriated retained earnings.

The reclassification of retained earnings has been approved through Annual General Shareholders Meeting No. 42 dated 16 March 2017.

37. PENDAPATAN BUNGA

37. INTEREST INCOME

	2024	2023	
Pinjaman yang diberikan	55,680,548	50,752,741	*Loans*
Obligasi Pemerintah	6,463,839	6,343,115	*Government Bonds*
Penempatan pada bank lain dan Bank Indonesia	2,281,994	2,780,518	*Placements with other banks and Bank Indonesia*
Wesel ekspor dan tagihan lainnya	1,133,565	1,090,839	*Bills and other receivables*
Efek-efek	781,391	352,453	*Marketable securities*
Lain-lain	241,773	152,030	*Others*
	66,583,110	**61,471,696**	

Pada tanggal 31 Desember 2024 dan 2023, termasuk dalam pendapatan bunga di atas adalah pendapatan dari pihak berelasi terkait transaksi Obligasi Pemerintah dan SPN masing-masing sebesar Rp6.401.737 dan Rp6.308.862.

As of 31 December 2024 and 2023, include in interest income is income from related parties related to Government Bonds and SPN transactions amounting to Rp6,401,737 and Rp6,308,862 respectively.

38. BEBAN BUNGA / *38. INTEREST EXPENSE*

	2024	2023	
Simpanan nasabah dan bank lain	21,275,769	16,457,684	*Deposits from customers and other banks*
Pinjaman yang diterima	3,483,211	2,712,942	*Borrowings*
Efek-efek yang diterbitkan	1,333,785	1,014,327	*Securities issued*
Lain-lain	10,140	11,070	*Others*
	26,102,905	**20,196,023**	

39. BEBAN GAJI DAN TUNJANGAN / *39. SALARIES AND EMPLOYEES' BENEFITS EXPENSE*

	2024	2023	
Gaji, upah dan tunjangan pajak	6,662,642	6,211,889	*Salaries, wages and tax allowance*
Tunjangan hari raya, kesehatan, kesejahteraan dan lainnya	3,578,496	3,572,066	*Yearly allowance, medical, welfare and others*
Bonus, insentif dan tantiem	2,942,782	1,924,715	*Bonus, incentives and tantiem*
Pendidikan dan pelatihan	249,222	410,181	*Training and development*
Lainnya	514,989	714,918	*Others*
	13,948,131	**12,833,769**	

Jumlah gaji dan tunjangan, bonus/tantiem, imbalan kerja jangka panjang yang dibayarkan kepada Dewan Komisaris, Direksi, Komite Audit serta *Senior Executive Vice President (SEVP), Executive Vice President (EVP)* dan *Senior Vice President (SVP)* masing-masing untuk periode yang berakhir pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

Total gross salaries and allowances, bonus/tantiem, long-term employment benefits paid to the Boards of Commissioners and Directors, Audit Committee and Senior Executive Vice President (SEVP), Executive Vice President (EVP) and Senior Vice President (SVP) for the period ended 31 December 2024 and 2023 are as follows:

	2024				
	Gaji dan tunjangan/ *Salaries and allowances*	**Bonus/tantiem/ *Bonus/tantiem***	**Imbalan kerja jangka panjang/ *Long-term employment benefits***	**Jumlah/ *Total***	
Dewan Komisaris	32,020	172,380	4,632	209,032	*Board of Commissioners*
Direksi	75,344	403,965	10,685	489,994	*Board of Directors*
Komite Audit	1,430	-	-	1,430	*Audit Committee*
SEVP, EVP dan *SVP*	261,104	58,016	-	319,120	*SEVP, EVP and SVP*
	369,898	**634,361**	**15,317**	**1,019,576**	

	2023				
	Gaji dan tunjangan/ *Salaries and allowances*	**Bonus/tantiem/ *Bonus/tantiem***	**Imbalan kerja jangka panjang/ *Long-term employment benefits***	**Jumlah/ *Total***	
Dewan Komisaris	29,412	90,700	4,259	124,371	*Board of Commissioners*
Direksi	70,593	224,301	10,794	305,688	*Board of Directors*
Komite Audit	1,430	-	-	1,430	*Audit Committee*
SEVP, EVP dan *SVP*	241,192	48,550	-	289,742	*SEVP, EVP and SVP*
	342,627	**363,551**	**15,053**	**721,231**	

39. BEBAN GAJI DAN TUNJANGAN (lanjutan)

Sesuai dengan kebijakan Bank, selain gaji, pegawai juga mendapatkan fasilitas dan tunjangan berupa Tunjangan Hari Raya (THR), fasilitas kesehatan, sumbangan kematian, tunjangan cuti, fasilitas jabatan untuk jabatan tertentu, program pensiun untuk pegawai tetap, insentif sesuai dengan kinerja Bank dan pegawai, dan manfaat untuk pegawai yang berhenti bekerja sesuai dengan Undang-Undang Ketenagakerjaan yang berlaku.

39. SALARIES AND EMPLOYEES' BENEFITS EXPENSE (continued)

Under the Bank's policy, in addition to salaries, employees are entitled to allowances and benefits, such as yearly allowance (THR), medical reimbursements, death allowance, leave allowance, functional allowance for certain levels, pension plan for permanent employees, incentives based on the Bank and employees' performance, and post-employment benefits in accordance with prevailing Labor Law.

40. BEBAN UMUM DAN ADMINISTRASI / *40. GENERAL AND ADMINISTRATIVE EXPENSES*

	2024	2023	
Penyusutan (Catatan 19)	2,416,792	2,304,524	*Depreciation (Note 19)*
Beban tenaga alih daya	1,716,107	1,685,406	*Outsourcing expenses*
Komunikasi	1,454,144	1,506,764	*Communications*
Perlengkapan kantor	727,928	798,920	*Office supplies*
Biaya sewa	679,572	801,699	*Rental expenses*
Perbaikan dan pemeliharaan	650,787	682,779	*Repairs and maintenance*
Transportasi	372,913	386,900	*Transportation*
Jasa profesional	338,563	263,534	*Professional services*
Listrik dan air	312,693	313,179	*Electricity and water*
Penelitian dan pengembangan	95,475	124,085	*Research and development*
Teknologi informasi	50,024	29,318	*Information technology*
Beban lain-lain	369,592	296,091	*Other expenses*
	9,184,590	**9,193,199**	

41. IMBALAN KERJA / *41. EMPLOYEE BENEFITS*

	2024	2023	
Imbalan kerja jangka pendek	3,230,142	2,524,538	*Short-term employee benefits*
Imbalan pasca kerja jangka panjang			*Long-term employee benefits*
Program pensiun manfaat pasti	1,096,813	1,852,727	*Defined benefit pension plan*
Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya	2,819,762	2,628,569	*Post employment benefits and other long-term employee benefits*
	3,916,575	4,481,296	
	7,146,717	**7,005,834**	

Program dana pensiun Bank ini dikelola oleh Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun"). Kontribusi pegawai adalah sebesar 7,5% dari penghasilan dasar pensiun karyawan dan sisa jumlah yang diperlukan untuk mendanai program tersebut ditanggung oleh BNI.

The pension plan of the Bank is managed by Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun"). The employees' contributions are 7.5% of the employee's pension salary-based and the remaining amounts required to fund the program/pension plan are contributed by BNI.

41. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti

Penilaian aktuaria atas manfaat pensiun pada tahun yang berakhir tanggal 31 Desember 2024 dan 2023, dilakukan oleh perusahaan konsultan aktuaria terdaftar independen, PT Towers Watson Purbajaga dengan menggunakan metode "*Projected Unit Credit*".

Rekonsiliasi status pembiayaan atas program pensiun berdasarkan laporan aktuaria tanggal 7 Januari 2025 dan 2 Januari 2024 disajikan sebagai berikut:

***41. EMPLOYEE BENEFITS** (continued)*

Defined benefit pension plan

The actuarial calculations of pension benefits for year ended 31 December 2024 and 2023 are prepared by a registered independent actuarial consulting firm, PT Towers Watson Purbajaga using the "Projected Unit Credit" method.

A reconciliation of the funding status of the pension plan based on the actuarial reports dated 7 January 2025 and dated 2 January 2024 are as follows:

	2024	2023	
Nilai wajar aset dana pensiun	7,564,079	7,022,652	*Fair value of pension plan assets*
Nilai kini liabilitas manfaat pasti yang didanai	(8,660,892)	(8,875,379)	*Present value of funded defined benefit obligation*
Selisih kurang pendanaan	**(1,096,813)**	**(1,852,727)**	*Funding deficit*

Mutasi nilai kini liabilitas manfaat pasti yang didanai selama tahun berjalan adalah sebagai berikut:

The movements in the present value of funded defined benefit obligations for the year are as follows:

	2024	2023	
Pada awal periode	8,875,379	8,306,111	*At beginning of the period*
Biaya jasa kini	153,017	250,969	*Current service cost*
Biaya bunga	586,253	463,119	*Interest cost*
	9,614,649	9,020,199	
Pengukuran kembali:			*Remeasurements:*
(Keuntungan)/kerugian aktuarial yang timbul dari perubahan asumsi keuangan	(253,928)	589,020	*Actuarial (gain)/loss from changes in financial assumption*
Keuntungan aktuarial yang timbul karena penyesuaian atas demografik	-	(162,935)	*Actuarial gains from changes in demographic*
Keuntungan aktuarial yang timbul karena penyesuaian atas pengalaman	(173,029)	(26,705)	*Actuarial gains from changes in experience*
	(426,957)	399,380	
Pembayaran dari program:			*Payments from plan:*
Iuran peserta	24,677	24,743	*Employees' contributions*
Imbalan yang dibayar	(551,477)	(568,943)	*Benefits paid*
	(526,800)	(544,200)	
	8,660,892	**8,875,379**	

41. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Rekonsiliasi atas perubahan aset bersih selama periode/tahun yang berakhir 31 Desember 2024 dan 2023 yang diakui di laporan posisi keuangan dana pensiun adalah sebagai berikut:

***41. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

The reconciliation of the movements of the net assets during the period/year ended 31 December 2024 and 2023 recognised in the pension fund's statement of financial position is as follows:

	2024	2023	
Kewajiban bersih pada awal periode	1,852,727	1,398,025	*Net liabilities at beginning of period*
Beban tahun berjalan	309,291	250,969	*Current year expenses*
Kontribusi pemberi kerja	(597,878)	(198,454)	*Employer's contributions*
Jumlah yang diakui pada penghasilan komprehensif lain	(467,327)	402,187	*Total amount recognised in other comprehensive income*
	1,096,813	**1,852,727**	

Mutasi nilai wajar aset program untuk periode/tahun yang berakhir adalah sebagai berikut:

The movements in the fair value of plan assets for the period/year ended are as follows:

	2024	2023	
Pada awal periode	7,022,652	6,908,086	*At beginning of the period*
Hasil dari aset program	459,304	463,119	*Return on plan assets*
Kerugian aktuarial	40,370	(2,807)	*Actuarial loss*
Kontribusi pemberi kerja	597,878	198,454	*Employer's contributions*
Kontribusi pekerja	24,677	24,743	*Employees' contributions*
Imbalan yang dibayar dan beban administrasi	(580,802)	(568,943)	*Benefits paid and administrative expenses paid*
	7,564,079	**7,022,652**	

Biaya imbalan pensiun yang dibebankan pada laporan laba rugi adalah sebagai berikut:

Pension expenses recognised in profit or loss, are as follows:

	2024	2023	
Biaya jasa kini	182,342	170,009	*Current service cost*
Biaya jasa lalu	-	(43,152)	*Past service cost*
Bunga bersih	126,949	124,112	*Net interest*
Biaya yang dibebankan pada laporan laba rugi	**309,291**	**250,969**	***Expense recognised in profit or loss***
Biaya yang dilaporkan pada laba rugi	309,291	250,969	*Expense recognised in profit or loss*
Pengukuran kembali yang diakui pada penghasilan komprehensif lain	(467,327)	402,187	*Remeasurement effect recognised in other comprehensive income*
Biaya imbalan pasti	**(158,036)**	**653,156**	***Defined benefit cost***

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah:

The key assumptions used in the above calculation are:

	2024	2023	
Asumsi ekonomi:			***Economic assumptions:***
Tingkat diskonto	7.00% - 8.00%	6.75% - 8.75%	*Discount rate*
Tingkat kenaikan gaji	7.00% - 9.00%	7.00%	*Rate of salary increases*
Pendapatan dari dana pensiun iuran pasti	5.50%	5.50%	*Interest credited to defined contribution fund*
Tingkat kenaikan manfaat pensiun	3.00% per tahun/*annually*	3.00% per tahun/*annually*	*Pension increase rate*
Manfaat lain	2,500,000	2,500,000	*Other benefits*

41. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah: (lanjutan)

41. EMPLOYEE BENEFITS *(continued)*

Defined benefit pension plan *(continued)*

The key assumptions used in the above calculation are: (continued)

	2024	2023	
Asumsi lainnya:			***Other assumptions:***
Usia pensiun normal	55/56 tahun/*years*	55 tahun/*years*	*Normal retirement age*
Tingkat kematian	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	*Mortality rate*
Tingkat cacat	10% dari tingkat/ kematian/*10% from mortality rate*	10% dari tingkat/ kematian/*10% from mortality rate*	*Disability rate*
Tingkat pengunduran diri			*Turnover rate*
Umur 20-29	4.2%	4.2%	*Age 20-29*
Umur 30-34	2.8%	2.8%	*Age 30-34*
Umur 35-39	3.0%	3.0%	*Age 35-39*
Umur 40-50	1.7%	1.7%	*Age 40-50*
Umur 51-52	1.3%	1.3%	*Age 51-52*
Umur >52	0.4%	0%	*Age >52*

Sensitivitas dari kewajiban manfaat pasti terhadap perubahan asumsi aktuaria adalah sebagai berikut:

The sensitivity of defined benefit obligation to changes in the weighted assumptions is as follows:

	Dampak terhadap kewajiban manfaat pasti/ *Impact on defined benefit obligation*		
2024	Perubahan asumsi/ *Change in assumption*	Nilai kini kewajiban manfaat pasti/ *Present value of benefit obligation*	***2024***
Tingkat diskonto	Kenaikan/*increase* 1%	(801,632)	*Discount rate*
	Penurunan/*decrease* 1%	959,403	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	153,102	*Salary increase rate*
	Penurunan/*decrease* 1%	(144,239)	

	Dampak terhadap kewajiban manfaat pasti/ *Impact on defined benefit obligation*		
2023	Perubahan asumsi/ *Change in assumption*	Nilai kini kewajiban manfaat pasti/ *Present value of benefit obligation*	***2023***
Tingkat diskonto	Kenaikan/*increase* 1%	(855,197)	*Discount rate*
	Penurunan/*decrease* 1%	1,028,803	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	176,505	*Salary increase rate*
	Penurunan/*decrease* 1%	(165,617)	

41. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Analisis sensitivitas didasarkan pada perubahan atas satu asumsi aktuarial dimana asumsi lainnya dianggap konstan. Dalam perhitungan sensitivitas kewajiban imbalan pasti atas asumsi aktuarial utama, metode yang sama (perhitungan nilai kini kewajiban imbalan pasti dengan menggunakan metode *projected unit credit* di akhir periode) telah diterapkan seperti dalam penghitungan kewajiban pensiun yang diakui dalam laporan posisi keuangan konsolidasian.

Pada tanggal 31 Desember 2024 dan 2023, aset program terdiri dari:

***41. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

The sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. When calculating the sensitivity of the defined benefit obligation to significant actuarial assumptions the same method (present value of the defined benefit obligation calculated with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the consolidated statement of financial position.

As of 31 December 2024 and 2023, plan assets comprise the following:

	2024	2023	
Obligasi pemerintah	2,863,250	2,042,937	*Government bonds*
Penempatan langsung	1,907,794	1,677,546	*Direct participation*
Obligasi	1,318,947	1,477,500	*Bonds*
Saham	932,663	1,027,890	*Shares*
Properti	321,461	315,597	*Property*
Deposito	137,393	278,222	*Time deposits*
Deposito *on call*	31,923	29,230	*On call deposits*
Reksa Dana	50,648	76,138	*Mutual funds*
Lain-lain	-	97,592	*Others*
	7,564,079	**7,022,652**	

Investasi telah terdiversifikasi dengan baik, sehingga kinerja buruk satu investasi tidak akan memberikan dampak material bagi seluruh kelompok aset. Proporsi terbesar aset investasi ditempatkan pada instrumen utang. Diyakini bahwa instrumen utang memberikan imbal hasil yang paling baik dalam jangka panjang pada tingkatan risiko yang dapat diterima. Untuk program manfaat pasti sebagian besar instrumen surat utang merupakan portofolio obligasi Pemerintah Republik Indonesia dan obligasi korporasi di Indonesia.

Investments are well-diversified, such that the failure of any single investment would not have a material impact to the overall group of assets. The largest proportion of assets are invested in debt instruments. Debt instruments are expected to contribute best yields in the long term at an acceptable risk level. For defined benefit program, most of the debt instruments are Government of Indonesia bonds and corporate bonds.

Hasil yang diharapkan dari aset program ditentukan dengan mempertimbangkan imbal hasil yang diharapkan atas aset yang mengacu pada kebijakan investasi. Hasil investasi bunga tetap didasarkan pada hasil pengembalian bruto pada tanggal pelaporan. Hasil yang diharapkan dari investasi ekuitas dan properti mencerminkan tingkat imbal hasil jangka panjang aktual yang terjadi untuk tiap-tiap pasar.

The expected return on plan assets is determined by considering the expected returns available on the assets in accordance with the current investment policy. Expected yields on fixed interest investments are based on gross redemption yields as of the reporting date. Expected returns on equity and property investments reflect long-term real rates of return experienced in the respective markets.

Bank terekspos beberapa risiko atas program imbalan kerja seperti risiko yang terekspos pada program manfaat pasti adalah adanya tingkat hasil investasi dibawah asumsi *discount rate* dan kenaikan gaji aktual yang lebih besar dari asumsi. Hal tersebut menimbulkan peningkatan iuran yang dibayarkan kepada Dana Pensiun.

The Bank is exposed to a number of risks through its employee benefit plans such as the exposed risks in defined benefit pension plan is the lower return on investment compared to assumption on discount rate and the increase in the actual salary is higher than its assumption. These will cause an increase in benefit paid to Pension Fund.

41. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Untuk memastikan bahwa posisi investasi yang telah diatur dalam kerangka *Asset Liability Management* (ALMA), Bank melakukan pemantauan terhadap investasi atas program pensiun (baik iuran pasti maupun manfaat pasti) dan memastikan tingkat investasi dimaksud mencapai tingkat diskonto yang digunakan. Selain itu, dilakukan implementasi kebijakan penyesuaian gaji sesuai dengan asumsi yang telah digunakan dalam perhitungan aktuaria untuk mengurangi selisih hasil perhitungan atas proyeksi imbalan kerja pasca kerja dengan realisasinya.

Rata-rata durasi kewajiban manfaat pasti pada tanggal 31 Desember 2024 adalah 10,42 tahun (31 Desember 2023: 9,00 tahun).

Analisis jatuh tempo yang diharapkan dari manfaat pensiun yang tidak terdiskonto untuk Entitas Induk adalah sebagai berikut:

***41. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

To ensure that the result of investments is consistent with the Asset Liability Management (ALMA) framework, the Bank performs monitoring over the investment for the pension program (for both defined benefit and contribution plans) and performs action to ensure the return of investments will meet the applicable discount rate. Apart from that, implementation of salary adjustment policy has been performed in accordance to the assumptions used by actuarial calculation to reduce the gap on the calculation of projected post-employment benefits with its realization.

The average duration of the defined benefit obligation as of 31 December 2024 is 10.42 years (31 December 2023: 9.00 years).

Expected maturity analysis of undiscounted pension benefit for Parent Only is as follows:

	Kurang dari 1 tahun/ *Less than a year*	2 sampai 5 tahun/ *Between 2 to 5 years*	Lebih dari 5 tahun/ *Over 5 years*	Jumlah/ *Total*	
31 Desember 2024					***31 December 2024***
Pensiun	608,201	2,910,741	27,847,409	31,366,351	*Pension*
Cuti besar	152,254	619,185	2,166,152	2,937,591	*Long leave*
Penghargaan masa kerja	86,275	311,127	1,867,703	2,265,105	*Gratuity*
Total	**846,730**	**3,841,053**	**31,881,264**	**36,569,047**	***Total***

	Kurang dari 1 tahun/ *Less than a year*	2 sampai 5 tahun/ *Between 2 to 5 years*	Lebih dari 5 tahun/ *Over 5 years*	Jumlah/ *Total*	
31 Desember 2023					***31 December 2023***
Pensiun	533,638	2,804,070	21,221,091	24,558,799	*Pension*
Cuti besar	106,013	629,952	2,060,639	2,796,604	*Long leave*
Penghargaan masa kerja	31,959	353,650	1,754,823	2,140,432	*Gratuity*
Total	**671,610**	**3,787,672**	**25,036,553**	**29,495,835**	***Total***

Program pensiun iuran pasti

Bank juga memiliki program pensiun iuran pasti, untuk karyawannya yang dikelola oleh Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk, dimana kontribusi iuran bank adalah sebesar 1,5% sampai dengan 6,5% dari gaji karyawan sesuai jabatan karyawan, sedangkan kontribusi iuran karyawan adalah sebesar 0,5% dari upah yang ditetapkan oleh Bank untuk karyawan tetap yang dipekerjakan sebelum tanggal 1 September 2005. Untuk karyawan tetap yang dipekerjakan mulai tanggal 1 September 2005, kontribusi Bank dan karyawan adalah masing-masing sebesar iuran 11,5% dan 3,5% dari gaji karyawan.

Karyawan tetap yang bergabung dengan Bank sebelum bulan September 2005, memiliki hak atas program pensiun manfaat pasti ditambah dengan program pensiun iuran pasti, atau imbalan kerja yang disediakan sesuai dengan Undang-Undang No. 11 Tahun 2020 dan peraturan penerapan terkaitnya PP No. 35 Tahun 2021, mana yang lebih tinggi.

Defined contribution pension plan

The Bank also has a defined contribution pension plan for its employees which is managed by Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk, whereby the contribution of the Bank is 1.5% to 6.5% of the employees' salaries according to the position of each employee, while the contribution of employees is 0.5% of the employees' salaries, determined by the Bank for employees hired before 1 September 2005. For employees hired after 1 September 2005, the Bank and its employees contribute 11.5% and 3.5%, respectively, of the employees' salaries.

Permanent employees who joined the Bank prior to September 2005 are entitled to defined benefits pension plan plus defined contribution pension plan, or the benefits provided for under the Labor Law No. 11 Tahun 2020 and its implementing regulation PP No. 35 Tahun 2021, whichever is higher.

41. IMBALAN KERJA (lanjutan)

Program pensiun iuran pasti (lanjutan)

Beban pensiun iuran pasti yang telah dibebankan pada laporan laba rugi adalah sebesar Rp271.374 dan Rp246.060 masing-masing untuk periode yang berakhir pada tanggal 31 Desember 2024 dan 2023.

Liabilitas atas imbalan pasca kerja meliputi uang jasa, uang pisah dan pesangon sesuai dengan Undang-Undang Cipta Kerja No. 11/2020, PP 35/2021 dan kompensasi lainnya.

Imbalan kerja jangka panjang lainnya

Imbalan jangka panjang lainnya seperti cuti berimbalan jangka panjang, imbalan cacat permanen dan penghargaan *jubilee* dihitung dengan menggunakan metode *projected unit credit* dan didiskontokan ke nilai kini.

Penilaian aktuarial atas imbalan kerja jangka panjang lainnya untuk periode/tahun yang berakhir tanggal 31 Desember 2024 dan 31 Desember 2023 dilakukan oleh perusahaan konsultan aktuaria terdaftar independen, PT Towers Watson Purbajaga dengan menggunakan metode "*Projected Unit Credit*" sebagaimana yang tercantum dalam laporan masing-masing pada tanggal 7 Januari 2025 dan 2 Januari 2024.

Perubahan liabilitas imbalan kerja yang diakui Bank pada laporan posisi keuangan konsolidasian adalah sebagai berikut:

***41. EMPLOYEE BENEFITS** (continued)*

***Defined contribution pension plan** (continued)*

Defined contribution pension expense that was charged to profit or loss amounted to Rp271,374 and Rp246,060 for the period ended 31 December 2024 and 2023, respectively.

The liability for post employment benefits consisted of service payments, severance and termination benefits based on Undang-Undang Cipta Kerja No. 11/2020, PP 35/2021 and other compensations.

Other long-term employee benefits

Other long-term employee benefits such as long service leave, permanent disability benefit and jubilee awards are calculated using the projected unit credit method and discounted to present value.

The actuarial valuation of other long-term employee benefits for the period/year ended 31 December 2024 and 31 December 2023 were prepared by a registered independent actuarial consulting firm, PT Towers Watson Purbajaga using the "Projected Unit Credit" method as stated in its reports dated 7 Januari 2025 and 2 January 2024, respectively.

The movements of the employee benefits liability recognised by the Bank in the consolidated statement of financial position are as follows:

	2024	2023	
Liabilitas bersih pada awal periode	2,628,569	2,324,859	*Net liability at the beginning of the period*
Biaya selama tahun berjalan	467,541	600,541	*Expense recognised during the current year*
Penyesuaian atas Perubahan Metode Atribusi - laba rugi	(4,510)	-	*Adjustments for Changes in Attribution Methods - Profit and Lost*
Jumlah yang diakui pada penghasilan komprehensif lain	(56,020)	112,469	*Total amount recognised in other comprehensive income*
Penyesuaian atas Perubahan Metode atribusi Komprehensif lain	-	-	*Adjustments for Changes in Attribution other comprehensive income*
Pembayaran imbalan	(215,818)	(409,300)	*Actual benefit payments*
	2,819,762	**2,628,569**	

Biaya imbalan kerja yang dibebankan Bank pada laporan laba rugi:

Employee benefits expense recognised by Bank in profit or loss:

	2024	2023	
Biaya jasa kini	299,719	358,023	*Current service cost*
Biaya bunga	171,094	155,674	*Interestcost*
(Keuntungan)/Kerugian aktuaria periode berjalan - bersih	(5,062)	86,844	*Net actuarial (Gain)/Lost recognised in current period*
Penyesuaian atas Perubahan Metode atribusi	(2,720)	-	*Adjustments for Changes in Attribution*
Biaya yang dibebankan pada laba rugi	**463,031**	**600,541**	***Expense recognised in profit or loss***

41. IMBALAN KERJA (lanjutan)

Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya (lanjutan)

Biaya imbalan kerja yang dibebankan Bank pada laporan laba rugi: (lanjutan)

41. EMPLOYEE BENEFITS *(continued)*

Post employment benefits and other long-term employee benefits *(continued)*

Employee benefits expense recognised by Bank in profit or loss: (continued)

	2024	2023	
Biaya imbalan pasti yang diakui pada laba rugi	465,751	600,541	*Defined benefit cost recognised in profit or loss*
Pengukuran kembali yang diakui pada penghasilan komprehensif lainnya	(56,020)	112,469	*Remeasurement effect recognised in other comprehensive income*
Biaya imbalan pasti	**409,731**	**713,010**	***Defined benefit cost***

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah:

The key assumptions used in the above calculation are:

	2024	2023	
Asumsi ekonomi:			***Economic assumptions:***
Tingkat diskonto per tahun	7.00%	6.75%	*Annual discount rate*
Tingkat kenaikan gaji	7.00 - 9.00%	7.00%	*Rate of salary increases*
Pendapatan dari dana pensiun iuran pasti	5.50%	5.50%	*Interest credited to defined contribution fund*
Asumsi lainnya:			***Other assumptions:***
Usia pensiun normal	55-56 tahun/*years*	55 tahun/*years*	*Normal retirement age*
Tingkat kematian	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	*Mortality rate*
Tingkat cacat	10% dari tingkat/ kematian/*10% from mortality rate*	10% dari tingkat/ kematian/*10% from mortality rate*	*Disability rate*
Tingkat pengunduran diri			*Turnover rate*
Umur 20-29	4.2%	4.2%	*Age 20-29*
Umur 30-34	2.8%	2.8%	*Age 30-34*
Umur 35-39	3.0%	3.0%	*Age 35-39*
Umur 40-50	1.7%	1.7%	*Age 40-50*
Umur 51-52	1.3%	1.3%	*Age 51-52*
Umur >52	0.4%	0%	*Age >52*

Sensitivitas dari kewajiban imbalan pasca kerja lainnya terhadap perubahan asumsi aktuaria adalah sebagai berikut:

The sensitivity of other post benefit obligation to changes in the actuarial assumptions is as follows:

		Dampak imbalan kerja jangka panjang lainnya/ *Impact on other long-term employee benefits*		
2024	**Perubahan Asumsi/ *Change in Assumption***	**Nilai kini kewajiban imbalan kerja/ *Present value of benefit obligation***	**Biaya jasa kini/ *Current service cost***	***2024***
Tingkat diskonto	Kenaikan/*increase* 1%	(151,165)	(4,838)	*Discount rate*
	Penurunan/*decrease* 1%	169,753	5,465	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	241,009	8,751	*Salary increase rate*
	Penurunan/*decrease* 1%	(200,400)	(6,986)	

41. IMBALAN KERJA (lanjutan)

Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya (lanjutan)

41. EMPLOYEE BENEFITS *(continued)*

Post employment benefits and other long-term employee benefits *(continued)*

2023	Perubahan Asumsi/ *Change in Assumption*	Dampak imbalan kerja jangka panjang lainnya/ *Impact on other long-term employee benefits* — Nilai kini kewajiban imbalan kerja/ *Present value of benefit obligation*	Biaya jasa kini/ *Current service cost*	*2023*
Tingkat diskonto	Kenaikan/*increase* 1%	(145,466)	(5,338)	*Discount rate*
	Penurunan/*decrease* 1%	163,528	6,074	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	228,078	8,466	*Salary increase rate*
	Penurunan/*decrease* 1%	(191,423)	(6,789)	

Analisis sensitivitas didasarkan pada perubahan atas satu asumsi aktuarial dimana asumsi lainnya dianggap konstan. Dalam perhitungan sensitivitas kewajiban imbalan pasti atas asumsi aktuarial utama, metode yang sama (perhitungan nilai kini kewajiban imbalan pasti dengan menggunakan metode *projected unit credit* di akhir periode pelaporan) telah diterapkan seperti dalam penghitungan kewajiban pensiun yang diakui dalam laporan posisi keuangan konsolidasian.

The sensitivity analysis is based on a change in an actuarial assumption while holding all other assumptions constant. When calculating the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value of the defined benefit obligation calculated with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the consolidated statement of financial position.

42. LABA PER SAHAM DASAR/DILUSIAN DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK

42. BASIC/DILUTED EARNINGS PER SHARE ATTRIBUTABLE TO EQUITY HOLDERS OF THE PARENT ENTITY

Laba tahun berjalan per saham dasar dihitung dengan membagi laba tahun berjalan diatribusikan kepada pemilik entitas induk dengan rata-rata tertimbang jumlah lembar saham biasa yang beredar pada tahun bersangkutan.

Basic earnings per share is computed by dividing income for the year attributable to owners of the parent entity by the weighted average number of outstanding common shares during the related year.

	2024	2023	
Laba tahun berjalan yang dapat diatribusikan kepada pemilik entitas induk	21,463,599	20,909,476	*Income for the year attributable to owners of the parent entity*
Rata-rata tertimbang jumlah lembar saham biasa yang beredar (dalam nilai penuh)	37,289,742,787	37,256,798,316	*Weighted average number of outstanding ordinary shares (in full amount)*
Laba per saham dasar diatribusikan kepada pemilik entitas induk (dalam Rupiah penuh)	576	561	*Basic earnings per share attributable to equity holders of the parent entity (in full Rupiah amount)*

Bank dan Entitas Anak tidak memiliki potensi saham yang bersifat dilutif.

Bank and Subsidiaries have no dilutive potential shares.

43. PEMBAYARAN BERBASIS SAHAM

Berdasarkan Keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 29 Maret 2021 yang diaktakan dengan akta No. 14, yang dibuat dihadapan Notaris Fathiah Helmi, S.H., dengan tanggal yang sama, RUPS telah menyetujui untuk mengalihkan secara keseluruhan saham hasil pembelian kembali *(buyback)* tahun 2020 yang disimpan sebagai saham treasuri sebanyak 19.579.700 saham dalam rangka Program Kepemilikan Saham oleh Pegawai dan Program Kepemilikan Saham oleh Direksi dan Dewan Komisaris.

Selanjutnya, berdasarkan Surat Kementerian Badan Usaha Milik Negara (KBUMN) No. SR-33/Wk2.MBU.A/10/2021 tanggal 1 Oktober 2021, Menteri Negara BUMN telah menetapkan besarnya Jumlah Tantiem untuk Direksi dan Dewan Komisaris atas kinerja Tahun Buku 2020. Menindaklanjuti hal tersebut, dengan memperhatikan ketentuan POJK No.45/POJK.03/2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum dan berdasarkan keputusan manajemen bahwa 20% dari jumlah Tantiem dibayarkan sebagai remunerasi yang harus ditangguhkan dan dibayarkan dalam bentuk saham untuk Direksi dan Dewan Komisaris non Independen, serta dalam bentuk deposito bagi Komisaris Independen.

Bank telah memberikan saham sebagaimana disebutkan di atas pada tanggal 30 Desember 2021 sebanyak 5.724.673 lembar saham dengan pembukaan periode *lock-up* beserta pembagiannya sebagai berikut:

1. Periode *lock-up* tahap I pada tanggal 5 Juni 2022 dengan jumlah saham sebesar 1.642.746 lembar saham;
2. Periode l*ock-up* tahap II pada tanggal 5 Juni 2023 dengan jumlah saham sebesar 1.642.738 lembar saham;
3. Periode *lock-up* tahap III pada tanggal 5 Juni 2024 dengan jumlah saham sebesar 1.642.726 lembar saham; dan
4. Periode *lock-up* tahap IV pada tanggal 5 Juni 2025 dengan jumlah saham sebesar 796.463 lembar saham.

Saham diberikan kepada Direksi dan Dewan Komisaris tertentu berdasarkan pada pencapaian performa kinerja Bank. Harga eksekusi yang diberikan sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp6.750 (nilai penuh).

43. SHARE-BASED PAYMENT

Based on the decision of the BNI's Shareholders Annual General Meeting held on 29 March 2021, notarized by deed No. 14, made before Notary Fathiah Helmi, S.H., on the same date, the shareholders approved the granting of authority and approved to transfer all of the shares from the 2020 buyback that has been registered as treasury shares of 19,579,700 for the purpose of the Employee Shares Ownership Program and the Board of Directors and the Board of Commissioners share ownership program.

Furthermore, according to the Letter of the Ministry of State-Owned Enterprises (KBUMN) No. SR-33/Wk2.MBU.A/10/2021 dated 1 October 2021, the Minister of State-Owned Enterprises has determined the amount of Tantiem for the Board of Directors and Board of Commissioners for the performance of Fiscal Year 2020. Following up on this, taking into account to POJK No.45/POJK 03/2015 concerning the Implementation of Good Corporate Governance in Providing Remuneration for Commercial Banks and based on management's decision that 20% of the amount of Tantiem is paid as remuneration which must be deferred and paid in the form of shares for Board of Directors and non Independent Board of Commissioners, as well as in the form of deposits for Independent Commissioners.

The Bank has granted 5,724,673 shares as mentioned above on 30 December 2021 with the opening lock-up period and the distribution are as follows:

1. *First phase of the lock-up period on 5 June 2022 with a total of 1,642,746 shares;*
2. *Lock-up period phase II on 5 June 2023 with a total of 1,642,738 shares;*
3. *Lock-up period phase III on 5 June 2024 with a total of 1,642,726 shares, and;*
4. *Lock-up period phase IV on 5 June 2025 with a total of 796,463 shares.*

Shares are granted to Board of Directors and Board of Commissioners based on Bank's performance target achievement. The exercise price of the granted options is equal to the market price at the grant date amounting to Rp6,750 (full amount).

43. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Selain itu, berdasarkan Keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2022 yang diaktakan dengan akta No. 22, yang dibuat dihadapan Notaris Fathiah Helmi, S.H., dengan tanggal yang sama, RUPS telah menyetujui untuk mengalihkan secara keseluruhan saham hasil pembelian kembali *(buyback)* tahun 2021 yang disimpan sebagai saham treasuri sebanyak 24.682.600 saham dalam rangka Program Kepemilikan Saham oleh Pegawai dan Program Kepemilikan Saham oleh Direksi dan Dewan Komisaris.

Selanjutnya, berdasarkan Surat Kementerian Badan Usaha Milik Negara (KBUMN) No. SR-23/Wk2.MBU.A/07/2022 tanggal 25 Juli 2022, Menteri Negara BUMN telah menetapkan besarnya Jumlah Tantiem untuk Direksi dan Dewan Komisaris atas kinerja Tahun Buku 2021. Menindaklanjuti hal tersebut, dengan memperhatikan ketentuan POJK No.45/POJK.03/2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum dan berdasarkan keputusan manajemen bahwa 10% dari jumlah Tantiem dibayarkan sebagai remunerasi yang harus ditangguhkan dan dibayarkan dalam bentuk saham untuk Direksi dan Dewan Komisaris Non Independen, serta dalam bentuk deposito bagi Komisaris Independen.

Bank telah memberikan saham sebagaimana disebutkan di atas pada tanggal 29 Juli 2022 sebanyak 3.001.097 lembar saham dengan pembukaan periode *lock-up* beserta pembagiannya sebagai berikut:

1. Periode *lock-up* tahap I pada tanggal 5 Juni 2023 dengan jumlah saham sebesar 922.460 lembar saham;
2. Periode *lock-up* tahap II pada tanggal 5 Juni 2024 dengan jumlah saham sebesar 1.039.325 lembar saham; dan
3. Periode *lock-up* tahap III pada tanggal 5 Juni 2025 dengan jumlah saham sebesar 1.039.312 lembar saham.

Saham diberikan kepada Direksi, Dewan Komisaris dan karyawan tertentu tersebut berdasarkan pada pencapaian performa kinerja Bank. Harga eksekusi yang diberikan sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp7.850 (nilai penuh).

***43. SHARE-BASED PAYMENT** (continued)*

Other than that, based on the decision of the BNI's Shareholders Annual General Meeting held on 15 March 2022, notarized by deed No. 22, made before Notary Fathiah Helmi, S.H., on the same date, the shareholders approved the granting of authority and approved to transfer all of the shares from the 2021 buyback that has been registered as treasury shares of 24,682,600 for the purpose of the Employee Shares Ownership Program and the Board of Directors and the Board of Commissioners share ownership program.

Furthermore, according to the Letter of the Ministry of State-Owned Enterprises (KBUMN) No. SR-*23/Wk2.MBU.A/07/2022 dated 25 July 2022, the Minister of State-Owned Enterprises has determined the amount of Tantiem for the Board of Directors and Board of Commissioners for the performance of Fiscal Year 2021. Following up on this, taking into account to POJK No.45/POJK 03/2015 concerning the Implementation of Good Corporate Governance in Providing Remuneration for Commercial Banks and based on management's decision that 10% of the amount of Tantiem is paid as remuneration which must be deferred and paid in the form of shares for Board of Directors and non Independent Board of Commissioners, as well as in the form of deposits for Independent Commissioners.*

The Bank has granted 3,001,097 shares as mentioned above on 29 July 2022 with the opening lock-up period and the distribution are as follows:

1. *First phase of the lock-up period on 5 June 2023 with a total of 922,460 shares;*
2. *Lock-up period phase II on 5 June 2024 with a total of 1,039,325 shares; and*
3. *Lock-up period phase III on 5 June 2025 with a total of 1,039,312 shares.*

Shares are granted to Board of Directors, Board of Commissioners and several employee based on Bank's performance target achievement. The exercise price of the granted options is equal to the market price at the grant date amounting to Rp7,850 (full amount).

43. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Berdasarkan keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2023 yang diaktakan dengan Akta No. 15 yang dibuat dihadapan Notaris Ashoya Ratam, SH, M.Kn., dengan tanggal yang sama, RUPS telah menyetujui untuk (1) Memberikan wewenang dan kuasa kepada Pemegang Saham Seri A Dwiwarna untuk menetapkan besarnya Tantiem untuk Tahun Buku 2022 (dua ribu dua puluh dua), serta menetapkan gaji/honorarium, tunjangan, fasilitas dan insentif lainnya termasuk namun tidak terbatas pada *Long Term Incentive*, bagi anggota Dewan Komisaris untuk Tahun 2023 (dua ribu dua puluh tiga). (2) Memberikan wewenang dan kuasa kepada Dewan Komisaris dengan terlebih dahulu mendapatkan persetujuan tertulis dari Pemegang Saham Seri A Dwiwarna untuk menetapkan besarnya Tantiem untuk Tahun Buku 2022 (dua ribu dua puluh dua), serta menetapkan gaji/honorarium, tunjangan, fasilitas dan insentif lainnya termasuk namun tidak terbatas pada *Long Term Incentive*, bagi anggota Direksi untuk Tahun 2023 (dua ribu dua puluh tiga).

Selanjutnya, berdasarkan Surat Kementerian Badan Usaha Milik Negara (KBUMN) No. SR-25/Wk2.MBU.A/07/2023 tanggal 4 Juli 2023 kemudian ditindaklanjuti dengan Surat Dewan Komisaris No. DK/84 tanggal 5 Juli 2023, pada tanggal 15 Februari 2024 Bank telah melakukan pembayaran remunerasi berbasis saham dalam bentuk *Long Term Incentive* sebanyak 15.637.000 lembar saham dengan pembukaan periode *lock-up* pada tahun 2026 dengan memperhatikan ketentuan *holding period* sesuai ketentuan *Long Term Incentive* BUMN pada Peraturan Menteri BUMN No. PER-3/MBU/03/2023 tentang Organ dan Sumber Daya Manusia Badan Usaha Milik Negara.

Saham dialokasikan kepada Direksi dan Dewan Komisaris yang menjabat sepanjang tahun 2023 dan akan dimiliki sepenuhnya (eksekusi) setelah tanggal *lock up* dan *holding period* berdasarkan pada pencapaian performa kinerja Bank pada tahun 2023-2025 sebagaimana yang telah diperjanjikan antara anggota Direksi dan Dewan Komisaris dengan Kementerian BUMN. Harga eksekusi adalah harga *fair value* tahun 2026 yang telah dihitung oleh konsultan independen yaitu sebesar Rp4.704 (nilai penuh).

***43. SHARE-BASED PAYMENT** (continued)*

Based on the decision of the BNI Annual General Meeting of Shareholders (GMS) dated 15 March 2023 which was notarized by Deed No. 15 made before Notary Ashoya Ratam, SH, M.Kn., on the same date, the GMS has agreed to (1) Grant authority and power to Series A Dwiwarna Shareholders to determine the amount of bonuses for the 2022 Financial Year (two thousand and twenty two), as well as determining salaries/honorariums, allowances, facilities and other incentives including but not limited to Long Term Incentives, for members of the Board of Commissioners for 2023 (two thousand twenty three). (2) Grant authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders to determine the amount of Tantiem for the 2022 Financial Year (two thousand twenty two), as well as determine the salary/honorarium, allowances, facilities and other incentives including but not limited to Long Term Incentives, for members of the Board of Directors for 2023 (two thousand twenty three).

Furthermore, based on the Letter of the Ministry of State-Owned Enterprises (KBUMN) No. SR-25/Wk2.MBU.A/07/2023 dated 4 July 2023 was then followed up with Board of Commissioners Letter No. DK/84 dated 5 July 2023, on 15 February 2024 the Bank has paid share-based remuneration in the form of Long Term Incentive of 15,637,000 shares with the opening of the lock-up period in 2026 taking into account the holding period provisions in accordance with the Long Term Incentive provisions BUMN in BUMN Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.

Shares are allocated to the Board of Directors and Board of Commissioners who serve throughout 2023 and will be fully owned (executed) after the lock up date and holding period based on the Bank's performance achievements in 2023-2025 as agreed between members of the Board of Directors and Board of Commissioners and the Ministry of BUMN . The execution price is the fair value price in 2026 which has been calculated by an independent consultant, namely Rp4,704 (full amount).

43. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Program *Employee Stock Allocation* ("ESA")

Berdasarkan Keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2022 yang diaktakan dengan akta No. 22, yang dibuat dihadapan Notaris Fathiah Helmi, S.H., dengan tanggal yang sama, RUPS telah menyetujui untuk mengalihkan secara keseluruhan saham hasil pembelian kembali (*buyback*) tahun 2021 yang disimpan sebagai saham treasuri sebanyak 24.682.600 saham dalam rangka Program Kepemilikan Saham oleh Pegawai dan Program Kepemilikan Saham oleh Direksi dan Dewan Komisaris. Menyetujui memberikan kuasa dan wewenang pelaksanaan Program Kepemilikan Saham bagi Pegawai dan/atau Program Kepemilikan Saham bagi Direksi dan Dewan Komisaris baik bersumber dari saham treasuri maupun sumber lainnya.

Bank telah memberikan saham sebagaimana disebutkan di atas pada tanggal 2 Juni 2022 sebanyak 67.795.400 lembar saham yang mempunyai pembukaan periode *lock-up* dengan tahapan sebagai berikut:

1. Pembukaan periode *lock-up* tahap I pada tanggal 2 Juni 2023 dengan jumlah saham sebesar 47.938.100 lembar saham,
2. Pembukaan periode *lock-up* tahap II pada tanggal 2 Juni 2024 dengan jumlah saham sebesar 10.854.800 lembar saham, dan
3. Pembukaan periode *lock-up* tahap III pada tanggal 2 Juni 2025 dengan jumlah saham sebesar 9.002.500 lembar saham.

Saham diberikan kepada direksi dan karyawan tertentu berdasarkan pada pencapaian performa kinerja Bank. Harga eksekusi yang diberikan sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp8.850 (nilai penuh).

Pada tanggal 29 Desember 2022, Bank memberikan saham sebanyak 10.355.756 lembar saham yang mempunyai pembukaan periode *lock-up* dengan tahapan sebagai berikut:

1. Pembukaan periode *lock-up* tahap I pada tanggal 2 Juni 2023 dengan jumlah saham sebesar 7.975.689 lembar saham;
2. Pembukaan periode *lock-up* tahap II pada tanggal 2 Juni 2024 dengan jumlah saham sebesar 622.400 lembar saham;
3. Pembukaan periode *lock-up* tahap III pada tanggal 2 Juni 2025 dengan jumlah saham sebesar 1.551.800 lembar saham; dan
4. Pembukaan periode *lock-up* tahap I pada tanggal 29 Maret 2023 dengan jumlah saham sebesar 102.933 lembar saham;

***43. SHARE-BASED PAYMENT** (continued)*

Employee Stock Allocation ("ESA") Program

Based on the decision of the BNI's Shareholders Annual General Meeting held on 15 March 2022, notarized by deed No. 22, made before Notary Fathiah Helmi, S.H., on the same date, the shareholders approved the granting of authority and approved to transfer all of the shares from the 2021 buyback that has been registered as treasury shares of 24,682,600 for the purpose of the Employee Shares Ownership Program and the Board of Directors and the Board of Commissioners Shares Ownership program. Approved and grant power and authority to implement the Share Ownership Program for Employees and/or Share Ownership Program for the Board of Directors and the Board of Commissioners, whether sourced from treasury shares or other source.

The Bank has granted shares as mentioned above on 2 June 2022 as many as 67,795,400 shares with the opening lock-up period and the distribution are as follows:

1. *First phase of the lock-up period on 2 June 2023 with a total of 47,938,100 shares;*
2. *Lock-up period phase II on 2 June 2024 with a total of 10,854,800 shares; and*
3. *Lock-up period phase III on 2 June 2025 with a total of 9,002,500 shares.*

Shares are granted to directors and to selected employees based on Bank's performance target achievement. The exercise price of the granted options is equal to the market price at the grant date amounting to Rp8,850 (full amount).

On 29 December 2022, The Bank has granted shares as many as 10,355,756 shares with the opening lock-up period and the distribution are as follows:

1. *First phase of the lock-up period on 2 June 2023 with a total of 7,975,689 shares;*
2. *Lock-up period phase II on 2 June 2024 with a total of 622,400 shares;*
3. *Lock-up period phase III on 2 June 2025 with a total of 1,551,800 shares; and*
4. *First phase of the lock-up period on 29 March 2023 with a total of 102,933 shares;*

43. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Program *Performance Stock Bonus*

Berdasarkan keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2023 yang diaktakan dengan Akta No. 15 yang dibuat dihadapan Notaris Ashoya Ratam, SH, M.Kn., dengan tanggal yang sama, RUPS telah menyetujui untuk pembelian kembali saham Perseroan (*buyback*) dan pengalihan saham hasil *buyback* yang disimpan sebagai saham treasuri (*treasury stock*), dengan nilai *buyback* sebesar-sebesarnya Rp905.000, dalam rangka program Kepemilikan Saham bagi Pegawai dan/atau Program Kepemilikan Saham bagi Direksi dan Dewan Komisaris sebagai salah satu opsi pengalihan saham hasil pembelian kembali (*buyback*) yang disimpan sebagai saham treasuri (*treasury stock*). Menyetujui memberikan kuasa dan wewenang pelaksanaan Program Kepemilikan Saham bagi Pegawai dan/atau Program Kepemilikan Saham bagi Direksi dan Dewan Komisaris kepada Direksi Perseroan untuk melaksanakan Program Kepemilikan Saham bagi Pegawai; dengan tetap memperhatikan peraturan perundang-undangan yang berlaku.

Pada tanggal 16 April 2024, Bank memberikan saham sebanyak 24.877.600 lembar saham, yang akan dimiliki sepenuhnya (eksekusi) setelah tanggal *lock up* dan *holding period* berdasarkan pada pencapaian performa kinerja Bank tahun 2024 yang telah ditetapkan; dan atau setelah 1 (satu) tahun tanggal alokasi dan *vesting*.

Harga saham *Performance Stock Bonus* sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp5.200 (nilai penuh).

43. SHARE-BASED PAYMENT (continued)

Performance Stock Bonus Program

Based on the decision of the BNI Annual General Meeting of Shareholders (GMS) dated 15 March 2023 which was notarized by Deed No. 15 made before Notary Ashoya Ratam, SH, M.Kn., on the same date, the GMS has decided to agreed the buyback of the Company's shares which have been issued and listed on the Indonesia Stock Exchange (IDX) for the full nominal amount buyback maximum Rp905,000 for the purpose of the Employee Stock Ownership Program and/or the Management Ownership Program for Directors and Board of Commissioners as one of the options for utilizing from buybacks which are held as treasury stock. Approved and grant power and authority to implement the Employee Stock Ownership Program and/or the Management Ownership Program to Company Directors to implement the Employee Stock Ownership Program; in compliance with applicable laws and regulations.

On 16 April 2024, The Bank has granted shares as many as 24,877,600 shares with the opening lock-up period and the distribution are as based on Bank's performance target achievement which has been set or a year after allocation date and vested.

The exercise price of the granted options is equal to the market price at the grant date amounting to Rp5,200 (full amount).

44. KOMITMEN DAN KONTINJENSI / *44. COMMITMENTS AND CONTINGENCIES*

	2024	2023	
Tagihan komitmen			***Commitment receivables***
Pembelian berjangka mata uang asing yang belum diselesaikan	211,119,603	95,742,672	*Unsettled purchased of foreign currency futures*
Lain-lain	87,401	83,611	*Others*
	211,207,004	**95,826,283**	
Liabilitas komitmen			***Commitment payables***
Penjualan berjangka mata uang asing yang belum diselesaikan	210,837,973	95,576,152	*Sales of foreign currency futures unresolved*
Fasilitas kredit kepada debitur yang belum digunakan	57,552,807	55,883,261	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	9,952,660	16,854,306	*Outstanding irrevocable letters of credit*
Lainnya	87,401	83,611	*Others*
	278,430,841	**168,397,330**	

44. KOMITMEN DAN KONTINJENSI (lanjutan) / *44. COMMITMENTS AND CONTINGENCIES (continued)*

	2024	2023	
Tagihan kontinjensi			***Contingent receivables***
Garansi bank yang diterima	27,161,836	23,425,868	*Bank guarantees received*
Pendapatan bunga dalam penyelesaian	11,789,678	12,030,214	*Interest receivable on non performing assets*
Lainnya	533,640	458,646	*Others*
	39,485,154	**35,914,728**	
Liabilitas kontinjensi			***Contingent payables***
Garansi yang diterbitkan dalam bentuk:			*Guarantees issued in the form of:*
Performance bonds	29,531,031	29,116,032	*Performance bonds*
Standby letters of credit	20,640,452	15,062,455	*Standby letters of credit*
Advance payment bonds	12,001,829	11,950,470	*Advance payment bonds*
Bid bonds	1,560,292	1,182,756	*Bid bonds*
Garansi bank lainnya	9,717,376	9,465,418	*Other bank guarantees*
Lainnya	3,119,342	2,000,569	*Others*
	76,570,322	**68,777,700**	

Transaksi komitmen dan kontinjensi yang terjadi dalam kegiatan normal Grup yang mempunyai risiko kredit adalah sebagai berikut:

Commitments and contingent transactions in the normal course of the Group's activities that have credit risk are as follows:

	2024	2023	
Garansi bank yang diterbitkan			*Bank guarantees issued*
Pihak berelasi (Catatan 45r)	22,790,386	22,324,075	*Related parties (Note 45r)*
Pihak ketiga	50,660,594	44,453,056	*Third parties*
Irrevocable letters of credit			*Irrevocable letters of credit*
Pihak berelasi (Catatan 45s)	3,908,349	12,275,824	*Related parties (Note 45s)*
Pihak ketiga	6,044,311	4,578,482	*Third parties*
Fasilitas kredit kepada debitur yang belum digunakan			*Unused loan facilities*
Pihak berelasi (Catatan 45t)	16,171,508	9,204,717	*Related parties (Note 45t)*
Pihak ketiga	41,381,299	46,678,544	*Third parties*
	140,956,447	**139,514,698**	

Informasi tambahan terkait kolektabilitas yang disajikan merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia diungkapkan pada Catatan 59k.

The following additional information presented in relation to collectibility required by applicable regulations and is not information required by Indonesian Accounting Standards are disclosed in Note 59k.

45. TRANSAKSI DENGAN PIHAK BERELASI

Dalam kegiatan normal usaha, Bank melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan. Semua transaksi dengan pihak-pihak berelasi telah dilakukan dengan kebijakan dan syarat yang telah disepakati bersama.

a. Jenis hubungan

Hubungan pihak berelasi sebagai pemegang saham utama

Pemerintah Republik Indonesia melalui Kementerian Keuangan

Pengendalian melalui Pemerintah Republik Indonesia

Badan Penyelenggara Jaminan Sosial (BPJS) Kesehatan

Badan Penyelenggara Jaminan Sosial (BPJS) Ketenagakerjaan

Kementerian Keuangan Republik Indonesia

Lembaga Kantor Berita Nasional (LKBN) Antara

Perum BULOG dan Entitas Anak

Perum DAMRI

Perum Jasa Tirta I

Perum Jasa Tirta II

Perum Lembaga Penyelenggara Pelayanan Navigasi Penerbangan Indonesia

Perum Percetakan Negara Republik Indonesia

Perum Percetakan Uang Republik Indonesia ("Perum Peruri") dan Entitas Anak

Perum Perhutani dan Entitas Anak

Perum Pengangkutan Penumpang Djakarta

Perum Perumnas

Perum Produksi Film Negara

PT Adhi Karya (Persero) Tbk dan Entitas Anak

PT Amarta Karya (Persero)

PT ASDP Indonesia Ferry (Persero) dan Entitas Anak

PT Asuransi Jiwasraya (Persero)

PT Asuransi Sosial Angkatan Bersenjata Republik Indonesia (Persero)

PT Aviasi Pariwisata Indonesia (Persero) dan Entitas Anak

PT Bahana Pembinaan Usaha Indonesia (Persero) dan Entitas Anak

PT Bank Mandiri (Persero) Tbk dan Entitas Anak

45. RELATED PARTY TRANSACTIONS

In the normal course of business, the Bank enters into certain transactions with parties which are related to the management and/or owned by the same ultimate shareholder. All transactions with related parties have met the agreed terms and conditions.

a. Type of relationships

Related party relationship as the controlling shareholder

The Government of Republic of Indonesia through the Ministry of Finance

Control through The Government of The Republic of Indonesia

Badan Penyelenggara Jaminan Sosial (BPJS) Kesehatan

Badan Penyelenggara Jaminan Sosial (BPJS) Ketenagakerjaan

Ministry of Finance of the Republic of Indonesia

Lembaga Kantor Berita Nasional (LKBN) Antara

Perum BULOG and Subsidiaries

Perum DAMRI

Perum Jasa Tirta I

Perum Jasa Tirta II

Perum Lembaga Penyelenggara Pelayanan Navigasi Penerbangan Indonesia

Perum Percetakan Negara Republik Indonesia

Perum Percetakan Uang Republik Indonesia ("Perum Peruri") and Subsidiaries

Perum Perhutani and Subsidiaries

Perum Pengangkutan Penumpang Djakarta

Perum Perumnas

Perum Produksi Film Negara

PT Adhi Karya (Persero) Tbk and Subsidiaries

PT Amarta Karya (Persero)

PT ASDP Indonesia Ferry (Persero) and Subsidiaries

PT Asuransi Jiwasraya (Persero)

PT Asuransi Sosial Angkatan Bersenjata Republik Indonesia (Persero)

PT Aviasi Pariwisata Indonesia (Persero) and Subsidiaries

PT Bahana Pembinaan Usaha Indonesia (Persero) and Subsidiaries

PT Bank Mandiri (Persero) Tbk and Subsidiaries

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

a. Jenis hubungan (lanjutan)

Pengendalian melalui Pemerintah Republik Indonesia (lanjutan)

PT Bank Rakyat Indonesia (Persero) Tbk dan Entitas Anak
PT Bank Tabungan Negara (Persero) Tbk
PT Barata Indonesia (Persero)
PT Bio Farma (Persero)
PT Biro Klasifikasi Indonesia (Persero)
PT Boma Bisma Indra (Persero)
PT Brantas Abipraya (Persero)
PT Danareksa (Persero) dan Entitas Anak
PT Djakarta Lloyd (Persero) dan Entitas Anak
PT Dok dan Perkapalan Kodja Bahari (Persero)
PT Dok dan Perkapalan Surabaya (Persero)
PT Garuda Indonesia (Persero) Tbk dan Entitas Anak
PT Hutama Karya (Persero) dan Entitas Anak
PT Indah Karya (Persero)
PT Indonesia Asahan Aluminium (Persero)
PT Indra Karya (Persero)
PT Industri Kapal Indonesia (Persero)
PT Industri Kereta Api (Persero) dan Entitas Anak
PT Industri Telekomunikasi Indonesia (Persero)
PT Jasa Marga (Persero) Tbk dan Entitas Anak
PT Kereta Api Indonesia (Persero) dan Entitas Anak
PT Krakatau Steel (Persero) dan Entitas Anak
PT Len Industri (Persero) dan Entitas Anak
PT PDI Pulau Batam (Persero)
PT Pelabuhan Indonesia (Persero) dan Entitas Anak
PT Pelayaran Nasional Indonesia (Persero) dan Entitas Anak
PT PANN (Persero) dan Entitas Anak
PT Pembangunan Perumahan (Persero) Tbk dan Entitas Anak

45. RELATED PARTY TRANSACTIONS *(continued)*

a. Type of relationships *(continued)*

Control through The Government of The Republic of Indonesia *(continued)*

PT Bank Rakyat Indonesia (Persero) Tbk and Subsidiaries
PT Bank Tabungan Negara (Persero) Tbk
PT Barata Indonesia (Persero)
PT Bio Farma (Persero)
PT Biro Klasifikasi Indonesia (Persero)
PT Boma Bisma Indra (Persero)
PT Brantas Abipraya (Persero)
PT Danareksa (Persero) and Subsidiaries
PT Djakarta Lloyd (Persero) and Subsidiaries
PT Dok dan Perkapalan Kodja Bahari (Persero)
PT Dok dan Perkapalan Surabaya (Persero)
PT Garuda Indonesia (Persero) Tbk and Subsidiaries
PT Hutama Karya (Persero) and Subsidiaries
PT Indah Karya (Persero)
PT Indonesia Asahan Aluminium (Persero)
PT Indra Karya (Persero)
PT Industri Kapal Indonesia (Persero)
PT Industri Kereta Api (Persero) and Subsidiaries
PT Industri Telekomunikasi Indonesia (Persero)
PT Jasa Marga (Persero) Tbk and Subsidiaries
PT Kereta Api Indonesia (Persero) and Subsidiaries
PT Krakatau Steel (Persero) and Subsidiaries
PT Len Industri (Persero) and Subsidiaries
PT PDI Pulau Batam (Persero)
PT Pelabuhan Indonesia (Persero) and Subsidiaries
PT Pelayaran Nasional Indonesia (Persero) and Subsidiaries
PT PANN (Persero) and Subsidiaries
PT Pembangunan Perumahan (Persero) Tbk and Subsidiaries

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

a. Jenis hubungan (lanjutan)

Pengendalian melalui Pemerintah Republik Indonesia (lanjutan)

PT Pengembangan Pariwisata Indonesia (Persero)
PT Perkebunan Nusantara III (Persero) dan Entitas Anak
PT Pertamina (Persero) dan Entitas Anak
PT Perusahaan Listrik Negara ("PLN") (Persero) dan Entitas Anak
PT Pos Indonesia (Persero) dan Entitas Anak
PT Primissima (Persero)
PT Pupuk Indonesia Holding Company (Persero) dan Entitas Anak
PT Rajawali Nusantara Indonesia (Persero) dan Entitas Anak
PT Reasuransi Indonesia Utama (Persero) dan Entitas Anak
PT Semen Indonesia (Persero) Tbk dan Entitas Anak
PT Semen Kupang (Persero)
PT Taspen (Persero) dan Entitas Anak
PT Telkom Indonesia (Persero) Tbk dan Entitas Anak
PT Varuna Tirta Prakasya (Persero)
PT Virama Karya (Persero)
PT Waskita Karya (Persero) Tbk dan Entitas Anak
PT Wijaya Karya (Persero) Tbk dan Entitas Anak
PT Yodya Karya (Persero)

Pengendalian Kegiatan Bank

Manajemen Kunci

Berdasarkan Kepemilikan dan/atau Kepengurusan

Dana Pensiun ("DP") BNI
Dana Pensiun Lembaga Keuangan ("DPLK") BNI
PT Asuransi Tripakarta

45. RELATED PARTY TRANSACTIONS *(continued)*

a. Type of relationships *(continued)*

Control through The Government of The Republic of Indonesia *(continued)*

PT Pengembangan Pariwisata Indonesia (Persero)
PT Perkebunan Nusantara III (Persero) and Subsidiaries
PT Pertamina (Persero) and Subsidiaries
PT Perusahaan Listrik Negara ("PLN") (Persero) and Subsidiaries
PT Pos Indonesia (Persero) and Subsidiaries
PT Primissima (Persero)
PT Pupuk Indonesia Holding Company (Persero) and Subsidiaries
PT Rajawali Nusantara Indonesia (Persero) and Subsidiaries
PT Reasuransi Indonesia Utama (Persero) and Subsidiaries
PT Semen Indonesia (Persero) Tbk and Subsidiaries
PT Semen Kupang (Persero)
PT Taspen (Persero) and Subsidiaries
PT Telkom Indonesia (Persero) Tbk and Subsidiaries
PT Varuna Tirta Prakasya (Persero)
PT Virama Karya (Persero)
PT Waskita Karya (Persero) Tbk and Subsidiaries
PT Wijaya Karya (Persero) Tbk and Subsidiaries
PT Yodya Karya (Persero)

Control on Bank's Activities

Key Management

By Ownership and/or Management

Dana Pensiun ("DP") BNI
Dana Pensiun Lembaga Keuangan ("DPLK") BNI
PT Asuransi Tripakarta

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***45. RELATED PARTY TRANSACTIONS** (continued)*

b. Giro pada bank lain

b. Current accounts with other banks

	2024	2023	
PT Bank Mandiri (Persero) Tbk	40,263	50,137	*PT Bank Mandiri (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	2,357	1,368	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Tabungan Negara (Persero) Tbk	354	749	*PT Bank Tabungan Negara (Persero) Tbk*
	42,974	**52,254**	

c. Penempatan pada bank lain dan Bank Indonesia

c. Placements with other banks and Bank Indonesia

	2024	2023	
PT Bank Mandiri (Persero) Tbk	1,097,013	97,300	*PT Bank Mandiri (Persero) Tbk*
PT Bank Tabungan Negara (Persero) Tbk	473,178	648,420	*PT Bank Tabungan Negara (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	50,000	464,901	*PT Bank Rakyat Indonesia (Persero) Tbk*
	1,620,191	**1,210,621**	

d. Efek-efek

d. Marketable securities

	2024	2023	
PT Danareksa (Persero)	2,758,639	2,750,852	*PT Danareksa (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	1,980,975	2,532,018	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
Kementerian Keuangan Republik Indonesia	1,675,069	1,321,967	*Ministry of Finance of The Republic of Indonesia*
PT Bank Mandiri (Persero) Tbk	1,278,725	1,252,790	*PT Bank Mandiri (Persero) Tbk*
PT PLN (Persero)	719,619	784,178	*PT PLN (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	689,192	1,117,420	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Hutama Karya (Persero)	386,870	391,263	*PT Hutama Karya (Persero)*
PT Telkom Indonesia (Persero) Tbk	221,354	240,173	*PT Telkom Indonesia (Persero) Tbk*
PT Semen Indonesia (Persero) Tbk	117,269	396,403	*PT Semen Indonesia (Persero) Tbk*
PT Pertamina (Persero)	69,078	72,214	*PT Pertamina (Persero)*
PT Pelabuhan Indonesia (Persero)	65,718	62,056	*PT Pelabuhan Indonesia (Persero)*
PT Adhi Karya (Persero) Tbk	49,917	50,574	*PT Adhi Karya (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	49,456	76,002	*PT Pupuk Indonesia Holding Company (Persero)*
PT Kereta Api Indonesia (Persero)	41,635	9,943	*PT Kereta Api Indonesia (Persero)*
PT Bank Tabungan Negara (Persero) Tbk	24,487	240,464	*PT Bank Tabungan Negara (Persero) Tbk*
PT Indonesia Asahan Aluminium (Persero)	24,465	9,693	*PT Indonesia Asahan Aluminium (Persero)*
PT Jasa Marga (Persero) Tbk	4,825	119,177	*PT Jasa Marga (Persero) Tbk*
PT Pembangunan Perumahan (Persero) Tbk	122	170	*PT Pembangunan Perumahan (Persero) Tbk*
	10,157,415	**11,427,357**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

45. RELATED PARTY TRANSACTIONS *(continued)*

e. Obligasi Pemerintah

e. Government Bonds

	2024	2023	
Pemerintah Republik Indonesia	126,661,172	125,021,175	*The Government of The Republic of Indonesia*

f. Wesel ekspor dan tagihan lainnya

f. Bills and other receivables

	2024	2023	
PT Brantas Abipraya (Persero)	1,905,957	1,848,749	*PT Brantas Abipraya (Persero)*
PT Semen Indonesia (Persero) Tbk	1,638,492	1,260,603	*PT Semen Indonesia (Persero) Tbk*
PT Hutama Karya (Persero)	993,367	1,549,938	*PT Hutama Karya (Persero)*
PT Bank Mandiri (Persero) Tbk	668,801	1,432,156	*PT Bank Mandiri (Persero) Tbk*
PT Danareksa (Persero)	321,559	310,588	*PT Danareksa (Persero)*
PT Telkom Indonesia (Persero) Tbk	254,117	150,573	*PT Telkom Indonesia (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	203,485	1,168,480	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Wijaya Karya (Persero) Tbk	106,144	611,292	*PT Wijaya Karya (Persero) Tbk*
PT Adhi Karya (Persero) Tbk	104,616	1,746,168	*PT Adhi Karya (Persero) Tbk*
PT Krakatau Steel (Persero)	12,198	6,693	*PT Krakatau Steel (Persero)*
	6,208,736	**10,085,240**	

g. Tagihan akseptasi

g. Acceptance receivables

	2024	2023	
PT Pembangunan Perumahan (Persero) Tbk	1,218,513	1,410,741	*PT Pembangunan Perumahan (Persero) Tbk*
PT Hutama Karya (Persero)	445,931	484,791	*PT Hutama Karya (Persero)*
PT Perkebunan Nusantara III (Persero)	292,727	-	*PT Perkebunan Nusantara III (Persero)*
PT Len Industri (Persero)	266,911	150,809	*PT Len Industri (Persero)*
PT Pupuk Indonesia Holding Company (Persero)	211,199	73,208	*PT Pupuk Indonesia Holding Company (Persero)*
PT Danareksa (Persero)	146,704	350,329	*PT Danareksa (Persero)*
PT Adhi Karya (Persero) Tbk	59,769	275,728	*PT Adhi Karya (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	41,509	79,200	*PT Bank Mandiri (Persero) Tbk*
PT Brantas Abipraya (Persero)	38,703	86,405	*PT Brantas Abipraya (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	34,070	36,935	*PT Rajawali Nusantara Indonesia (Persero)*
PT Semen Indonesia (Persero) Tbk	31,933	64,903	*PT Semen Indonesia (Persero) Tbk*
PT Wijaya Karya (Persero) Tbk	17,884	105,675	*PT Wijaya Karya (Persero) Tbk*
PT Krakatau Steel (Persero)	10,861	-	*PT Krakatau Steel (Persero)*
PT Pertamina (Persero)	8,546	-	*PT Pertamina (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	-	40,231	*PT Bank Rakyat Indonesia (Persero) Tbk*
	2,825,260	**3,158,955**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***45. RELATED PARTY TRANSACTIONS** (continued)*

h. Tagihan derivatif

h. Derivative receivables

	2024	2023	
PT PLN (Persero)	228,720	8,319	*PT PLN (Persero)*
PT Bank Mandiri (Persero) Tbk	57,994	19,279	*PT Bank Mandiri (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	31,689	1,855	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	20,471	8,486	*PT Pupuk Indonesia Holding Company (Persero)*
PT Pertamina (Persero)	2,567	-	*PT Pertamina (Persero)*
PT Garuda Indonesia (Persero)	391	-	*PT Garuda Indonesia (Persero)*
	341,832	**37,939**	

i. Pinjaman yang diberikan

i. Loans

	2024	2023	
Kementerian Keuangan Republik Indonesia	36,774,522	11,969,049	*Ministry of Finance of The Republic of Indonesia*
Perum BULOG	19,742,438	15,683,736	*Perum BULOG*
PT Jasa Marga (Persero) Tbk	14,511,463	13,976,854	*PT Jasa Marga (Persero) Tbk*
PT Waskita Karya (Persero) Tbk	11,476,159	11,546,283	*PT Waskita Karya (Persero) Tbk*
PT PLN (Persero)	8,538,268	7,950,153	*PT PLN (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	7,821,688	4,518,679	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Telkom Indonesia (Persero) Tbk	7,577,536	7,026,449	*PT Telkom Indonesia (Persero) Tbk*
PT Perkebunan Nusantara III (Persero)	7,540,939	8,330,263	*PT Perkebunan Nusantara III (Persero)*
PT Krakatau Steel (Persero)	4,699,123	4,613,234	*PT Krakatau Steel (Persero)*
PT Kereta Api Indonesia (Persero)	4,687,982	3,352,414	*PT Kereta Api Indonesia (Persero)*
PT Pertamina (Persero)	4,288,892	6,677,809	*PT Pertamina (Persero)*
PT Pupuk Indonesia Holding Company (Persero)	4,055,706	4,746,715	*PT Pupuk Indonesia Holding Company (Persero)*
PT Garuda Indonesia (Persero)	3,695,998	3,591,933	*PT Garuda Indonesia (Persero)*
PT Len Industri (Persero)	3,583,348	3,813,123	*PT Len Industri (Persero)*
PT Indonesia Asahan Aluminium (Persero)	3,244,823	1,062,328	*PT Indonesia Asahan Aluminium (Persero)*
PT Semen Indonesia (Persero) Tbk	3,019,880	3,667,076	*PT Semen Indonesia (Persero) Tbk*
PT Bio Farma (Persero)	2,171,366	1,602,806	*PT Bio Farma (Persero)*
PT Aviasi Pariwisata Indonesia (Persero)	2,065,008	2,223,742	*PT Aviasi Pariwisata Indonesia (Persero)*
PT Wijaya Karya (Persero) Tbk	1,995,018	1,285,844	*PT Wijaya Karya (Persero) Tbk*
PT Hutama Karya (Persero)	1,813,312	1,655,238	*PT Hutama Karya (Persero)*
PT Adhi Karya (Persero) Tbk	1,667,599	2,229,313	*PT Adhi Karya (Persero) Tbk*
PT Rajawali Nusantara Indonesia (Persero)	925,702	702,235	*PT Rajawali Nusantara Indonesia (Persero)*
PT Pelabuhan Indonesia (Persero)	870,708	879,049	*PT Pelabuhan Indonesia (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	631,450	998,328	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	540,958	412,127	*PT Pembangunan Perumahan (Persero) Tbk*
PT Pos Indonesia (Persero)	369,777	303,997	*PT Pos Indonesia (Persero)*
PT Barata Indonesia (Persero)	-	335,884	*PT Barata Indonesia (Persero)*
Lain-lain	1,093,026	1,204,659	*Others*
	159,402,689	**126,359,320**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***45. RELATED PARTY TRANSACTIONS** (continued)*

j. Investasi pada entitas asosiasi dan penyertaan saham

j. Investment in associates and equity investments

	2024	2023	
PT Bank Syariah Indonesia Tbk	12,748,127	11,283,466	*PT Bank Syariah Indonesia Tbk*
PT Fintek Karya Nusantara	369,614	377,547	*PT Fintek Karya Nusantara*
	13,117,741	**11,661,013**	

k. Simpanan nasabah

k. Deposits from customers

	2024	2023	
Entitas dikendalikan melalui Pemerintah Republik Indonesia	112,692,952	151,973,948	*Entities controlled through the Government of Republic of Indonesia*
Manajemen Kunci	140,859	106,442	*Key Management*
	112,833,811	**152,080,390**	

l. Simpanan dari bank lain

l. Deposits from other banks

	2024	2023	
Entitas dikendalikan melalui Pemerintah Republik Indonesia	4,164,697	2,705,107	*Entities controlled through the Government of Republic of Indonesia*

m. Efek-efek yang diterbitkan

m. Securities issued

	2024	2023	
BPJS Ketenagakerjaan	629,938	629,800	*BPJS Ketenagakerjaan*
Kementerian Keuangan Republik Indonesia	619,938	719,771	*Ministry of Finance of The Republic of Indonesia*
PT Bank Rakyat Indonesia (Persero) Tbk	352,030	116,059	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bahana Pembinaan Usaha Indonesia (Persero)	85,976	91,960	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
DPLK BNI	59,982	59,973	*DPLK BNI*
PT Bank Mandiri (Persero) Tbk	55,983	55,975	*PT Bank Mandiri (Persero) Tbk*
PT Asabri (Persero)	39,996	39,987	*PT Asabri (Persero)*
PT Reasuransi Indonesia Utama (Persero)	19,998	19,994	*PT Reasuransi Indonesia Utama (Persero)*
DP BNI	14,995	14,993	*DP BNI*
PT Pertamina (Persero)	12,996	5,997	*PT Pertamina (Persero)*
PT Danareksa (Persero)	-	9,996	*PT Danareksa (Persero)*
	1,891,832	**1,764,505**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan) / *45. RELATED PARTY TRANSACTIONS (continued)*

n. Pinjaman yang diterima / *n. Borrowings*

	2024	2023	
PT Bank Mandiri (Persero) Tbk	1,525,654	772,307	*PT Bank Mandiri (Persero) Tbk*
Kementerian Keuangan Republik Indonesia	48,557	51,861	*Ministry of Finance of The Republic of Indonesia*
	1,574,211	**824,168**	

o. Efek-efek subordinasi / *o. Subordinated securities*

	2024	2023	
PT Bank Mandiri (Persero) Tbk	3,218	3,078	*PT Bank Mandiri (Persero) Tbk*

p. Liabilitas derivatif / *p. Derivative payables*

	2024	2023	
PT PLN (Persero)	69,964	80	*PT PLN (Persero)*
PT Bank Mandiri (Persero) Tbk	37,180	4,264	*PT Bank Mandiri (Persero) Tbk*
PT Pertamina (Persero)	26,893	121,447	*PT Pertamina (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	20,803	2,895	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	-	7,452	*PT Pupuk Indonesia Holding Company (Persero)*
	154,840	**136,138**	

q. Liabilitas akseptasi / *q. Acceptance payables*

	2024	2023	
PT Bank Mandiri (Persero) Tbk	834,268	893,585	*PT Bank Mandiri (Persero) Tbk*
PT Rajawali Nusantara Indonesia (Persero)	41,394	-	*PT Rajawali Nusantara Indonesia (Persero)*
PT Waskita Karya (Persero) Tbk	18,084	-	*PT Waskita Karya (Persero) Tbk*
PT Semen Indonesia (Persero) Tbk	7,006	20,457	*PT Semen Indonesia (Persero) Tbk*
PT Wijaya Karya (Persero) Tbk	3	-	*PT Wijaya Karya (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	-	138,134	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Indonesia Asahan Aluminium (Persero)	-	10,754	*PT Indonesia Asahan Aluminium (Persero)*
PT Bank Tabungan Negara (Persero) Tbk	-	4,467	*PT Bank Tabungan Negara (Persero) Tbk*
PT Biro Klasifikasi Indonesia	-	2,905	*PT Biro Klasifikasi Indonesia*
PT Telkom Indonesia (Persero) Tbk	-	298	*PT Telkom Indonesia (Persero) Tbk*
	900,755	**1,070,600**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***45. RELATED PARTY TRANSACTIONS** (continued)*

r. Garansi bank yang diterbitkan

r. Bank guarantees issued

	2024	2023	
PT Pertamina (Persero)	4,728,735	2,512,652	*PT Pertamina (Persero)*
PT Pupuk Indonesia Holding Company (Persero)	3,114,170	2,119,528	*PT Pupuk Indonesia Holding Company (Persero)*
PT Hutama Karya (Persero)	2,964,796	3,522,061	*PT Hutama Karya (Persero)*
PT Bank Mandiri (Persero) Tbk	1,942,939	1,696,927	*PT Bank Mandiri (Persero) Tbk*
PT Wijaya Karya (Persero) Tbk	1,761,163	1,661,600	*PT Wijaya Karya (Persero) Tbk*
PT Adhi Karya (Persero) Tbk	1,648,980	2,490,682	*PT Adhi Karya (Persero) Tbk*
PT Telkom Indonesia (Persero) Tbk	1,596,544	1,677,400	*PT Telkom Indonesia (Persero) Tbk*
PT Danareksa (Persero)	1,549,760	1,608,943	*PT Danareksa (Persero)*
PT Len Industri (Persero)	781,896	646,521	*PT Len Industri (Persero)*
PT Brantas Abipraya (Persero)	551,718	652,926	*PT Brantas Abipraya (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	514,688	680,357	*PT Pembangunan Perumahan (Persero) Tbk*
PT PLN (Persero)	363,999	1,038,203	*PT PLN (Persero)*
PT Waskita Karya (Persero) Tbk	301,927	471,088	*PT Waskita Karya (Persero) Tbk*
PT Biro Klasifikasi Indonesia (Persero)	164,897	143,017	*PT Biro Klasifikasi Indonesia (Persero)*
PT Jasa Marga (Persero) Tbk	150,375	185,112	*PT Jasa Marga (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	96,802	111,384	*PT Bank Rakyat Indonesia (Persero) Tbk*
Perum Peruri	89,932	7,456	*Perum Peruri*
PT Semen Indonesia (Persero) Tbk	72,760	5,915	*PT Semen Indonesia (Persero) Tbk*
PT Pelabuhan Indonesia (Persero)	62,792	68,938	*PT Pelabuhan Indonesia (Persero)*
PT Pengembangan Pariwisata Indonesia ITDC (Persero)	58,199	53,671	*PT Pengembangan Pariwisata Indonesia ITDC (Persero)*
PT Industri Kereta Api (Persero)	50,870	614,178	*PT Industri Kereta Api (Persero)*
PT Asuransi Tripakarta	48,287	67,756	*PT Asuransi Tripakarta*
PT Aviasi Pariwisata Indonesia (Persero)	45,025	36,719	*PT Aviasi Pariwisata Indonesia (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	38,019	33,821	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	36,551	112,136	*PT Rajawali Nusantara Indonesia (Persero)*
PT Virama Karya (Persero)	35,649	24,120	*PT Virama Karya (Persero)*
PT Indra Karya (Persero)	6,655	7,358	*PT Indra Karya (Persero)*
PT Krakatau Steel (Persero)	5,249	34,452	*PT Krakatau Steel (Persero)*
PT Amarta Karya (Persero)	2,403	-	*PT Amarta Karya (Persero)*
PT Pos Indonesia (Persero)	1,701	1,746	*PT Pos Indonesia (Persero)*
PT Barata Indonesia (Persero)	1,650	13,483	*PT Barata Indonesia (Persero)*
Perum Perumnas	601	601	*Perum Perumnas*
PT Industri Telekomunikasi Indonesia (Persero)	308	-	*PT Industri Telekomunikasi Indonesia (Persero)*
PT Garuda Indonesia (Persero)	196	1,066	*PT Garuda Indonesia (Persero)*
PT Indonesia Asahan Aluminium (Persero)	76	222	*PT Indonesia Asahan Aluminium (Persero)*
PT Bio Farma (Persero)	74	633	*PT Bio Farma (Persero)*
PT Djakarta Lloyd (Persero)	-	11,460	*PT Djakarta Lloyd (Persero)*
Kementerian Keuangan Republik Indonesia	-	4,206	*Ministry of Finance of The Republic of Indonesia*
PT Pelayaran Nasional Indonesia (Persero)	-	3,614	*PT Pelayaran Nasional Indonesia (Persero)*
PT Kereta Api Indonesia (Persero)	-	1,159	*PT Kereta Api Indonesia (Persero)*
PT Yodya Karya (Persero)	-	911	*PT Yodya Karya (Persero)*
PT Primissima (Persero)	-	53	*PT Primissima (Persero)*
	22,790,386	**22,324,075**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

45. RELATED PARTY TRANSACTIONS *(continued)*

s. *Irrevocable Letters of Credit*

s. Irrevocable Letters of Credit

	2024	2023	
PT Pertamina (Persero)	1,017,057	853,704	*PT Pertamina (Persero)*
PT Industri Kereta Api (Persero)	573,806	-	*PT Industri Kereta Api (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	548,384	641,546	*PT Pembangunan Perumahan (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	413,435	524,532	*PT Pupuk Indonesia Holding Company (Persero)*
Perum BULOG	398,922	8,336,405	*Perum BULOG*
PT Len Industri (Persero)	337,571	402,481	*PT Len Industri (Persero)*
PT Hutama Karya (Persero)	185,879	233,435	*PT Hutama Karya (Persero)*
PT PLN (Persero)	135,576	419,602	*PT PLN (Persero)*
PT Danareksa (Persero)	91,521	164,632	*PT Danareksa (Persero)*
PT Semen Indonesia (Persero) Tbk	82,114	97,909	*PT Semen Indonesia (Persero) Tbk*
PT Krakatau Steel (Persero)	27,117	93,358	*PT Krakatau Steel (Persero)*
PT Wijaya Karya (Persero) Tbk	22,597	31,917	*PT Wijaya Karya (Persero) Tbk*
Perum Peruri	21,665	5,508	*Perum Peruri*
PT Perkebunan Nusantara III (Persero)	11,122	-	*PT Perkebunan Nusantara III (Persero)*
PT Adhi Karya (Persero) Tbk	11,051	145,884	*PT Adhi Karya (Persero) Tbk*
PT Pelayaran Nasional Indonesia (Persero)	10,802	-	*PT Pelayaran Nasional Indonesia (Persero)*
PT Brantas Abipraya (Persero)	10,256	21,852	*PT Brantas Abipraya (Persero)*
PT Kereta Api Indonesia (Persero)	8,682	271,156	*PT Kereta Api Indonesia (Persero)*
PT Indonesia Asahan Aluminium (Persero)	792	-	*PT Indonesia Asahan Aluminium (Persero)*
Kementerian Keuangan Republik Indonesia	-	29,003	*Ministry of Finance of The Republic of Indonesia*
PT Rajawali Nusantara Indonesia (Persero)	-	2,900	*PT Rajawali Nusantara Indonesia (Persero)*
	3,908,349	**12,275,824**	

t. Fasilitas pinjaman yang belum ditarik

t. Unused loan facilities

	2024	2023	
Kementerian Keuangan Republik Indonesia	5,841,173	4,112,175	*Ministry of Finance of The Republic of Indonesia*
PT Telkom Indonesia (Persero) Tbk	3,687,389	32,635	*PT Telkom Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	2,713,792	1,264,028	*PT Pupuk Indonesia Holding Company (Persero)*
PT Krakatau Steel (Persero)	1,208,377	1,155,151	*PT Krakatau Steel (Persero)*
PT PLN (Persero)	1,014,647	-	*PT PLN (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	902,905	521,379	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Len Industri (Persero)	211,191	288,728	*PT Len Industri (Persero)*
Perum BULOG	155,218	11,000	*Perum BULOG*
PT Hutama Karya (Persero)	152,571	130,451	*PT Hutama Karya (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	115,156	20,955	*PT Rajawali Nusantara Indonesia (Persero)*
Manajemen Kunci	61,177	57,198	*Key Management*
PT Brantas Abipraya (Persero)	25,000	25,000	*PT Brantas Abipraya (Persero)*
PT Pertamina (Persero)	19,261	938	*PT Pertamina (Persero)*
PT Virama Karya (Persero)	15,556	22,569	*PT Virama Karya (Persero)*
PT Semen Indonesia (Persero) Tbk	10,226	641	*PT Semen Indonesia (Persero) Tbk*
PT Kereta Api Indonesia (Persero)	5,206	7,146	*PT Kereta Api Indonesia (Persero)*
PT Indonesia Asahan Aluminium (Persero)	5,073	133	*PT Indonesia Asahan Aluminium (Persero)*
BPJS Kesehatan	5,026	-	*BPJS Kesehatan*
PT Pelabuhan Indonesia (Persero)	3,957	286	*PT Pelabuhan Indonesia (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	3,579	-	*PT Bahana Pembinaan Usaha Indonesia (Persero)*

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

45. RELATED PARTY TRANSACTIONS *(continued)*

t. Fasilitas pinjaman yang belum ditarik (lanjutan)

t. Unused loan facilities *(continued)*

	2024	2023	
PT Aviasi Pariwisata Indonesia (Persero)	2,944	767	*PT Aviasi Pariwisata Indonesia (Persero)*
PT Perkebunan Nusantara III (Persero)	2,188	646	*PT Perkebunan Nusantara III (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	1,934	2,406	*PT Pembangunan Perumahan (Persero) Tbk*
Perum Peruri	1,711	89	*Perum Peruri*
PT Danareksa (Persero)	1,277	50,000	*PT Danareksa (Persero)*
PT Bio Farma (Persero)	1,095	-	*PT Bio Farma (Persero)*
PT Adhi Karya (Persero) Tbk	966	-	*PT Adhi Karya (Persero) Tbk*
PT Asuransi Tripakarta	961	-	*PT Asuransi Tripakarta (Persero)*
PT Waskita Karya (Persero) Tbk	821	-	*PT Waskita Karya (Persero) Tbk*
PT Garuda Indonesia (Persero)	447	4,751	*PT Garuda Indonesia (Persero)*
PT Primissima (Persero)	393	-	*PT Primissima (Persero)*
PT Asuransi Jiwasraya (Persero)	270	-	*PT Asuransi Jiwasraya (Persero)*
PT Djakarta Lloyd (Persero)	21	-	*PT Djakarta Lloyd (Persero)*
PT Jasa Marga (Persero)	-	1,100,000	*PT Jasa Marga (Persero)*
PT Pelayaran Nasional Indonesia (Persero)	-	300,000	*PT Pelayaran Nasional Indonesia (Persero)*
PT Pos Indonesia (Persero)	-	95,645	*PT Pos Indonesia (Persero)*
	16,171,508	**9,204,717**	

u. Gaji dan tunjangan

u. Salaries and employees' benefits

	2024				
	Imbalan kerja jangka pendek/ *short-term benefit*	**Imbalan kerja jangka panjang lainnya/ *other long-term benefit***	**Pesangon pemutusan kontrak kerja/ *termination benefit***	**Total**	
Dewan Komisaris	32,020	172,380	4,632	209,032	*Board of Commissioners*
Direksi	75,344	403,965	10,685	489,994	*Board of Directors*
Komite Audit	1,430	-	-	1,430	*Audit Committee*
SEVP, EVP dan *SVP*	261,104	58,016	-	319,120	*SEVP, EVP and SVP*
	369,898	**634,361**	**15,317**	**1,019,576**	

	2023				
	Imbalan kerja jangka pendek/ *short-term benefit*	**Imbalan kerja jangka panjang lainnya/ *other long-term benefit***	**Pesangon pemutusan kontrak kerja/ *termination benefit***	**Total**	
Dewan Komisaris	29,412	90,700	4,259	124,371	*Board of Commissioners*
Direksi	70,593	224,301	10,794	305,688	*Board of Directors*
Komite Audit	1,430	-	-	1,430	*Audit Committee*
SEVP, EVP dan *SVP*	241,192	48,550	-	289,742	*SEVP, EVP and SVP*
	342,627	**363,551**	**15,053**	**721,231**	

45. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

45. *RELATED PARTY TRANSACTIONS (continued)*

Rincian saldo transaksi dengan pihak-pihak berelasi pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

The details of balances of transactions with related parties as of 31 December 2024 and 2023 are as follows:

	2024	2023	
Aset			***Assets***
Giro pada bank lain	42,974	52,254	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	1,620,191	1,210,621	*Placements with other banks and Bank Indonesia*
Efek-efek	10,157,415	11,427,357	*Marketable securities*
Obligasi pemerintah	126,661,172	125,021,175	*Government bonds*
Wesel ekspor dan tagihan lainnya	6,208,736	10,085,240	*Bills and other receivables*
Tagihan akseptasi	2,825,260	3,158,955	*Acceptance receivables*
Tagihan derivatif	341,832	37,939	*Derivative receivables*
Pinjaman yang diberikan	159,402,689	126,359,320	*Loans*
Investasi pada entitas asosiasi dan penyertaan saham	13,117,741	11,661,013	*Investment in associates and equity investments*
Jumlah aset kepada pihak-pihak berelasi	320,378,010	289,013,874	*Total assets with related parties*
Jumlah aset konsolidasian	1,129,805,637	1,086,663,986	*Total consolidated assets*
Persentase jumlah aset kepada pihak-pihak berelasi terhadap jumlah aset konsolidasian	28.4%	26.6%	*Percentage of total assets with related parties to total consolidated assets*
Liabilitas			***Liabilities***
Simpanan nasabah	112,833,811	152,080,390	*Deposits from customers*
Simpanan dari bank lain	4,164,697	2,705,107	*Deposits from other banks*
Efek-efek yang diterbitkan	1,891,832	1,764,505	*Securities issued*
Pinjaman yang diterima	1,574,211	824,168	*Borrowings*
Efek-efek subordinasi	3,218	3,078	*Subordinated securities*
Liabilitas derivatif	154,840	136,138	*Derivative payables*
Liabilitas akseptasi	900,755	1,070,600	*Acceptance payables*
Jumlah liabilitas kepada pihak-pihak berelasi	121,523,364	158,583,986	*Total liabilities with related parties*
Jumlah liabilitas konsolidasian	962,619,084	931,931,466	*Total consolidated liabilities*
Persentase jumlah liabilitas kepada pihak-pihak berelasi terhadap jumlah liabilitas konsolidasian	12.6%	17.0%	*Percentage of total liabilities with related parties to total consolidated liabilities*

46. INFORMASI SEGMEN

46. *SEGMENT INFORMATION*

Grup menerapkan Konsep 3 Dimensi untuk penilaian kinerja secara internal yaitu Dimensi Segmen, Dimensi *Channel* dan Dimensi Produk. Untuk kepentingan pelaporan Segmen, maka yang dilaporkan adalah berdasarkan Dimensi Segmen.

The Group applies the 3 Dimensional Concept for internal performance assessment, namely Segment, Channel and Product Dimensions. For the purpose of Segment reporting, what is reported is based on the Segment Dimension.

46. INFORMASI SEGMEN (lanjutan)

Dibawah ini adalah penjelasan mengenai pelaporan masing-masing segmen per 31 Desember 2024 dan 2023:

- ***Wholesale & International Banking*****:** termasuk pinjaman yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya milik nasabah korporasi, baik BUMN dan badan usaha swasta termasuk institusi keuangan dan nasabah kantor cabang luar negeri.

- ***Institutional Banking*****:** termasuk pinjaman yang diberikan, simpanan nasabah dan dan transaksi-transaksi lainnya milik nasabah Kementerian, Lembaga Pemerintah, yayasan dan universitas.

- ***Enterprises & Commercial Banking***: termasuk pinjaman yang diberikan, simpanan nasabah dan dan transaksi-transaksi lainnya milik nasabah dengan skala menengah/komersial.

- ***Retail Banking***: termasuk pinjaman yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya milik nasabah SME, kredit program dan konsumer termasuk kredit pembiayaan konsumsi termasuk kredit kepemilikan rumah, kartu kredit serta produk dan jasa lainnya seperti dana pihak ketiga, transaksi pembayaran dan transaksi-transaksi lainnya milik nasabah perorangan.

- ***Treasury*****:** terkait dengan kegiatan treasuri Bank termasuk transaksi valuta asing, *money market, fixed income* dan pasar modal.

- **Kantor Pusat**: terutama mengelola aset dan liabilitas Grup selain yang telah dikelola oleh segmen operasi lainnya termasuk menerima alokasi biaya atas penyediaan jasa servis secara sentralisasi kepada segmen lainnya serta pendapatan/biaya yang tidak teralokasi ke pelaporan segmen lainnya.

- **Entitas Anak**: seluruh transaksi yang dilakukan oleh Entitas Anak yang bergerak di bidang asuransi, pembiayaan konsumen, perbankan, modal ventura dan sekuritas.

Kinerja diukur berdasarkan laba segmen sebelum pajak penghasilan, sebagaimana dilaporkan dalam laporan internal manajemen yang ditelaah oleh Manajemen Bank. Keuntungan segmen digunakan untuk mengukur kinerja dimana manajemen berkeyakinan bahwa informasi tersebut paling relevan dalam mengevaluasi hasil segmen tersebut relatif terhadap entitas lain yang beroperasi dalam industri tersebut.

46. SEGMENT INFORMATION *(continued)*

Below is an explanation of the reporting of each segment as of 31 December 2024 and 2023:

- ***Wholesale & International Banking:*** *including loans, customer deposits and other transactions belonging to corporate customers, both BUMN and private business entities including financial institutions and overseas branch customers.*

- ***Institutional Banking:*** *including loans, customer deposits and other transactions belonging to customers of Ministries, Government Institutions, foundations and universities.*

- ***Enterprises & Commercial Banking :*** *including loans, customer deposits and other transactions belonging to customers of middle/commercial.*

- ***Retail Banking:*** *including loans, customer deposits and other transactions belonging to consumer customers including SME, credit program, and consumer financing loans including home ownership loans, credit cards, other products and services such as third party funds, payment transactions and other transactions belonging to customers individual.*

- ***Treasury:*** *related to the Bank's treasury activities including foreign exchange transactions, money market, fixed income, and capital market.*

- ***Head Office:*** *mainly manages the Group's assets and liabilities in addition to those already managed by other operating segments including receiving cost allocation for centralised service provision to other segments as well as revenues/costs that are not allocated to other segment reporting*.

- ***Subsidiaries:*** *all transactions conducted by Subsidiaries engaged in insurance, consumer financing, banking, venture capital and securities*.

Performance is measured based on segment profit before income tax, as included in the internal management reports that are reviewed by the Bank's Management. Segment profit is used to measure performance of that business segment as management believes that such information is the most relevant in evaluating the results of those segments relative to other entities that operate within these industries.

46. INFORMASI SEGMEN (lanjutan)

46. SEGMENT INFORMATION (continued)

Informasi yang berkaitan dengan segmen usaha yang utama dari Grup pada tahun 31 Desember 2024 dan 2023 disajikan dalam tabel di bawah ini:

Information relating to the Group's main business segments as of 31 December 2024 and 2023 is presented in the table below:

	2024									
	Wholesale & International Banking/ *Wholesale & International Banking*	**Institutional Banking/ *Institutional Banking***	**Enterprises & Commercial Banking/ *Enterprises & Commercial Banking***	**Retail Banking/ *Retail Banking***	**Treasuri/ *Treasury***	**Kantor Pusat/ *Head Office***	**Entitas Anak/ *Subsidiaries***	**Penyesuaian dan eliminasi/ *Adjustment and elimination*****	**Konsolidasian/ *Consolidation***	
Pendapatan Bunga - Bersih*	10,122,463	2,559,885	5,027,781	20,890,487	887,462	-	990,152	1,975	40,480,205	*Interest Income - Net**
Pendapatan Premi - Bersih	-	-	-	-	-	-	1,723,862	(52)	1,723,810	*Premium Income - Net*
Pendapatan Operasional Lainnya	4,809,272	138,977	2,783,360	10,331,957	2,066,255	1,687,952	988,617	(495,485)	22,310,905	*Other Operating Income*
Pembentukan Cadangan Penurunan Nilai	2,073,048	(19,029)	(2,544,728)	(6,698,305)	5,030	(796,695)	(229,883)	-	(8,210,562)	*Allowance for Impairment Losses*
Beban Operasional Lainnya	(4,466,624)	(977,464)	(2,598,799)	(15,288,903)	(213,018)	(3,800,879)	(2,792,025)	449,267	(29,688,445)	*Other Operating expenses*
Laba (Rugi) Operasional	12,538,159	1,702,369	2,667,614	9,235,236	2,745,729	(2,909,622)	680,723	(44,295)	26,615,913	*Operating Income (Loss)*
Pendapatan (Beban) Bukan Operasional - Bersih	-	-	-	-	-	85,292	(119,418)	(1,329)	(35,455)	*Non Operating Income (Expense) - Net*
Laba Sebelum Pajak	12,538,159	1,702,369	2,667,614	9,235,236	2,745,729	(2,824,330)	561,305	(45,624)	26,580,458	*Income Before Tax*
Beban Pajak	-	-	-	-	-	(4,858,442)	(52,619)	-	(4,911,061)	*Tax Expense*
Laba Bersih	12,538,159	1,702,369	2,667,614	9,235,236	2,745,729	(7,682,772)	508,686	(45,624)	21,669,397	*Net Income*
Total aset	462,848,837	42,843,155	114,311,685	249,516,512	214,904,399	-	52,993,895	(7,612,846)	1,129,805,637	*Total asset*
Total liabilitas	240,519,814	126,003,254	61,388,620	419,836,159	78,574,962	-	39,400,245	(3,103,970)	962,619,084	*Total liabilities*

	2023									
	Wholesale & International Banking/ *Wholesale & International Banking*	**Institutional Banking/ *Institutional Banking***	**Enterprises & Commercial Banking/ *Enterprises & Commercial Banking***	**Retail Banking/ *Retail Banking***	**Treasuri/ *Treasury***	**Kantor Pusat/ *Head Office***	**Entitas Anak/ *Subsidiaries***	**Penyesuaian dan eliminasi/ *Adjustment and elimination*****	**Konsolidasian/ *Consolidation***	
Pendapatan Bunga - Bersih*	11,446,981	1,821,300	5,906,465	20,113,753	1,381,170	-	631,793	(25,789)	41,275,673	*Interest Income - Net**
Pendapatan Premi - Bersih	-	-	-	-	-	-	1,659,301	-	1,659,301	*Premium Income - Net*
Pendapatan Operasional Lainnya	4,615,372	119,494	2,097,474	9,889,645	1,300,476	1,458,900	871,994	(540,926)	19,812,429	*Other Operating Income*
Pembentukan Cadangan Penurunan Nilai	475,060	18,027	(2,554,956)	(6,523,155)	4,723	(490,611)	(125,490)	-	(9,196,402)	*Allowance for Impairment Losses*
Beban Operasional Lainnya	(4,880,168)	(905,945)	(3,049,512)	(13,586,703)	(341,513)	(3,039,442)	(2,443,353)	468,971	(27,777,665)	*Other Operating expenses*
Laba (Rugi) Operasional	11,657,245	1,052,876	2,399,471	9,893,540	2,344,856	(2,071,153)	594,245	(97,744)	25,773,336	*Operating Income (Loss)*
Pendapatan (Beban) Bukan Operasional – Bersih	-	-	-	-	-	(21,236)	(111,153)	(1,209)	(133,598)	*Non Operating Income (Expense) - Net*
Laba Sebelum Pajak	11,657,245	1,052,876	2,399,471	9,893,540	2,344,856	(2,092,389)	483,092	(98,953)	25,639,738	*Income Before Tax*
Beban Pajak	-	-	-	-	-	(4,471,401)	(62,109)	-	(4,533,510)	*Tax Expense*
Laba Bersih	11,657,245	1,052,876	2,399,471	9,893,540	2,344,856	(6,563,790)	420,983	(98,953)	21,106,228	*Net Income*
Total aset	408,673,828	18,535,540	122,112,729	246,767,432	252,636,198	-	46,283,112	(8,344,853)	1,086,663,986	*Total asset*
Total liabilitas	270,141,046	144,998,599	58,257,384	380,439,627	48,958,503	-	32,940,170	(3,803,863)	931,931,466	*Total liabilities*

*) termasuk komponen *internal transfer pricing* antar segmen operasi
**) termasuk eliminasi *internal transfer pricing* atau reklasifikasi antar segmen operasi dan eliminasi terhadap entitas anak

*) *Includes components of internal transfer pricing between operating segment*
**) *Includes elimination of internal transfer pricing or reclassification between operating segment and elimination of subsidiaries*

46. INFORMASI SEGMEN (lanjutan)

***46. SEGMENT INFORMATION** (continued)*

Informasi yang berkaitan dengan segmen geografis BNI dan Entitas Anak disajikan dalam tabel di bawah ini:

Information concerning the geographical segments of BNI and Subsidiaries are set out in the tables below:

	2024						
	Indonesia	**New York**	**Eropa/ *Europe***	**Asia**	**Penyesuaian dan eliminasi/ *Adjustment and elimination***	**Konsolidasian /*Consolidated***	
Pendapatan Bunga - Bersih	39,082,359	310,656	131,855	953,360	1,975	40,480,205	*Interest Income - Net*
Pendapatan Premi - Bersih	1,723,862	-	-	-	(52)	1,723,810	*Premium Income - Net*
Pendapatan Operasional lainnya	22,055,143	55,224	205,713	490,310	(495,485)	22,310,905	*Other Operating Income*
(Pembentukan)/pemulihan Cadangan Kerugian Penurunan Nilai	(8,045,756)	14,741	39,908	(219,455)	-	(8,210,562)	*(Allowance)/ Reversal For Impairment Losses*
Beban Operasional Lainnya	(29,023,006)	(198,415)	(229,741)	(686,550)	449,267	(29,688,445)	*Other Operating Expenses*
Laba Operasional	25,792,602	182,206	147,735	537,665	(44,295)	26,615,913	*Operating Income*
Pendapatan/(Beban) Bukan Operasional - Bersih	(48,201)	9,611	(18)	4,482	(1,329)	(35,455)	*Non Operating Income/ (Expenses) - Net*
Laba Sebelum Beban Pajak	25,744,401	191,817	147,717	542,147	(45,624)	26,580,458	*Income Before Tax Expense*
Beban Pajak	(4,911,061)	-	-	-	-	(4,911,061)	*Tax Expense*
Laba Bersih						21,669,397	*Net Income*
Total aset	1,022,444,178	21,338,584	15,819,954	77,875,767	(7,672,846)	1,129,805,637	*Total assets*
Total liabilitas	849,866,678	21,495,924	15,985,094	78,375,360	(3,103,972)	962,619,084	*Total liabilities*

	2023						
	Indonesia	**New York**	**Eropa/ *Europe***	**Asia**	**Penyesuaian dan eliminasi/ *Adjustment and elimination***	**Konsolidasian /*Consolidated***	
Pendapatan Bunga - Bersih	40,234,359	351,958	86,419	628,726	(25,789)	41,275,673	*Interest Income - Net*
Pendapatan Premi - Bersih	1,659,301	-	-	-	-	1,659,301	*Premium Income - Net*
Pendapatan Operasional lainnya	19,742,487	40,524	179,927	390,417	(540,926)	19,812,429	*Other Operating Income*
(Pembentukan)/pemulihan Cadangan Kerugian Penurunan Nilai	(9,141,600)	20,295	(23,101)	(51,996)	-	(9,196,402)	*(Allowance)/ Reversal For Impairment Losses*
Beban Operasional Lainnya	(27,140,368)	(286,850)	(194,887)	(624,531)	468,971	(27,777,665)	*Other Operating Expenses*
Laba Operasional	25,354,179	125,927	48,358	342,616	(97,744)	25,773,336	*Operating Income*
Pendapatan/(Beban) Bukan Operasional - Bersih	(131,043)	(365)	(1,684)	703	(1,209)	(133,598)	*Non Operating Income/ (Expenses) - Net*
Laba Sebelum Beban Pajak	25,223,136	125,562	46,674	343,319	(98,953)	25,639,738	*Income Before Tax Expense*
Beban Pajak	(4,533,510)	-	-	-	-	(4,533,510)	*Tax Expense*
Laba Bersih						21,106,228	*Net Income*
Total aset	995,000,675	24,964,345	10,199,820	64,843,999	(8,344,853)	1,086,663,986	*Total assets*
Total liabilitas	834,842,015	25,143,135	10,351,738	65,398,441	(3,803,863)	931,931,466	*Total liabilities*

47. MANAJEMEN RISIKO

Untuk mengantisipasi tantangan ekonomi domestik maupun global serta peningkatan eksposur risiko yang dihadapi oleh BNI, dibutuhkan suatu sistem pengelolaan risiko dan permodalan yang efektif dan terintegrasi, yang mampu mendukung pencapaian dan pertumbuhan kinerja secara berkelanjutan sekaligus meningkatkan daya saing Bank.

Risiko adalah potensi kerugian akibat terjadinya suatu peristiwa tertentu. Risiko dalam konteks perbankan merupakan suatu kejadian potensial, baik yang diperkirakan (*expected*) maupun yang tidak diperkirakan (*unexpected*) yang berdampak negatif terhadap pendapatan dan permodalan Bank.

Manajemen risiko merupakan serangkaian metodologi dan prosedur yang digunakan untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko yang timbul dari seluruh kegiatan usaha Bank, termasuk upaya untuk memitigasi dan/atau meminimalkan kerugian finansial maupun non-finansial yang mungkin timbul dari produk atau aktivitas Bank, hubungan antara Bank dengan nasabah maupun dalam internal Bank.

Informasi tambahan manajemen risiko yang merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia diungkapkan pada Catatan 59l.

Penerapan Manajemen Risiko didasari oleh kebutuhan akan keseimbangan fungsi bisnis dengan pengelolaan risiko, dimana Manajemen Risiko menjadi *strategic partner* dari Unit Bisnis untuk mengoptimalkan pendapatan dari Unit Bisnis secara keseluruhan.

Dalam rangka penerapan Manajemen Risiko yang efektif, baik untuk BNI secara individu maupun secara Konsolidasi dan Terintegrasi dengan Entitas Anak, penerapan manajemen risiko dilakukan melalui 4 (empat) pilar penerapan manajemen risiko yaitu: (i) Pengawasan aktif direksi dan dewan komisaris; (ii) Kecukupan kebijakan, dan prosedur manajemen risiko serta penetapan limit risiko; (iii) Kecukupan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko serta Sistem Informasi Manajemen Risiko; dan (iv) Sistem pengendalian internal yang menyeluruh.

Penerapan manajemen risiko di BNI secara umum terangkum dalam kerangka manajemen risiko. Kerangka manajemen risiko ini dituangkan dalam kebijakan, prosedur, limit-limit transaksi, kewenangan dan ketentuan lain serta diaplikasikan dalam perangkat manajemen risiko, yang berlaku di seluruh lingkup aktivitas usaha.

47. RISK MANAGEMENT

To anticipate domestic and global economic challenges and also increase risk exposures faced by BNI, an effective and integrated risk and capital management system is needed, which is able to support the achievement and growth of sustainable performance while enhancing the competitiveness of the Bank.

Risk is the potential loss due to certain events. Risk in the banking context is a potential event, either an expected or an unexpected that has a negative impact on bank income and capital of the Bank.

Risk management is a set of methodologies and procedures used to identify, measure, monitor, or control the risks arising from the entire Bank's business activities, including the efforts to mitigate and/or minimise financial or non-financial losses that may arise from products or activities of the Bank, the relationship between the Bank and its customer and also within the internal Bank.

The following additional information risk management that is required by applicable regulations and is not required by Indonesian Accounting Standards is disclosed in Note 59l.

The Risk Management implementation is based on the need to maintain balance between the business functions with the risk management, where Risk Management becoming a strategic partner for the Business Unit to optimise the revenue from the Business Unit as a whole.

In order to implement effective Risk Management, both for BNI individually and as a Consolidated and Integrated subsidiaries, the application of risk management is done through 4 (four) pillars of risk management: (i) Active control from board of directors and board of commissioners; (ii) The adequacy of policies and risk management procedures and, ie. risk limit determination; (iii) The adequacy of identification process, measurement, monitoring, and risk control and Risk Management Information Systems; and (iv) Overall internal control systems.

Implementation of risk management in BNI is undertaken within the risk management framework. This risk management framework is outlined in the policies, procedures, transaction limits, authorities and other regulations as well as being applied in the risk management tools, which is applicable in the whole scope of business activities.

47. MANAJEMEN RISIKO (lanjutan)

Secara berkala dilakukan evaluasi terhadap kebijakan dan prosedur manajemen risiko agar sesuai dengan perkembangan bisnis dan perubahan regulasi.

Sebagai bagian dari Strategi Manajemen Risiko, BNI menetapkan *Risk Appetite Statement* (RAS). RAS merupakan jenis dan tingkat risiko yang sanggup diambil/dihadapi Bank yang berada dalam kapasitas risiko yang dimiliki dalam rangka mencapai tujuan bisnis. Adapun *Risk Appetite Statement* BNI sebagai berikut:

Risk Appetite	*Risk Appetite Statement*
Permodalan	Memelihara modal sesuai dengan tingkat risiko dan di-*review* secara periodik.
Rentabilitas	Memelihara rentabilitas secara berkesinambungan dalam jangka panjang untuk mendukung pertumbuhan permodalan dan kinerja bank.
Risiko Kredit	a. Memelihara pertumbuhan kredit yang berkualitas fokus pada sektor prioritas. Pemberian kredit kepada sektor industri dan kegiatan usaha berisiko tinggi dilakukan dengan sangat hati-hati dan selektif. b. Mengelola risiko konsentrasi pada level yang menghasilkan *return* optimum. c. Meningkatkan kualitas kredit dan efektivitas pengelolaan kredit bermasalah.
Risiko Pasar	Memelihara tingkat Risiko Pasar sesuai ketentuan dengan tetap memperhatikan pencapaian target bisnis.
Risiko Likuiditas	Memelihara ketersediaan likuiditas sesuai ketentuan dengan tetap memperhatikan pencapaian target bisnis.
Risiko Operasional	a. *Intolerance* pada *internal fraud*. b. Integritas sepenuhnya terintegrasi ke dalam semua proses pengambilan keputusan dan perencanaan. c. Bank memiliki *risk appetite* yang rendah atas risiko operasional sehingga perlu perbaikan terus menerus terhadap Kualitas Identifikasi dan Pengendalian Risiko. d. Manajemen risiko yang kuat untuk keberlangsungan layanan IT. e. Menjaga implementasi proyek IT sesuai jadwal yang telah ditetapkan. f. *Business Continuity Management* (BCM) yang kuat untuk meminimalkan dampak *external event* terhadap SDM, layanan dan aset BNI.
Risiko Hukum	Meminimalisir potensi kerugian akibat permasalahan hukum dalam kegiatan usaha BNI.

***47. RISK MANAGEMENT** (continued)*

Periodic evaluation is applied to risk management policies and procedures to ensure it reflects the Bank's current business and regulations.

As part of the Risk Management Strategy, BNI establishes a Risk Appetite Statement (RAS). RAS is the type and level of risk that a Bank can take/face within its risk capacity in order to achieve business objectives. The BNI Risk Appetite Statement is as follows:

Risk Appetite	*Risk Appetite Statement*
Capital	*Maintaining capital according to the level of risk and reviewed periodically.*
Rentability	*Maintain sustainable profitability in the long term to support capital growth and bank performance.*
Credit Risk	*a. Maintaining quality credit growth focusing on priority sectors. Lending to the industrial sector and high-risk business activities is carried out very carefully and selectively.* *b. Manage concentration risk at a level that generates optimum returns.* *c. Improving credit quality and effectiveness in managing non-performing loans.*
Market Risk	*Maintaining the level of Market Risk in accordance with regulations while taking into account the achievement of business targets.*
Liquidity Risk	*Maintaining the availability of liquidity in accordance with the provisions by taking into account the achievement of business targets.*
Operational Risk	*a. Intolerance to internal fraud.* *b. Integrity is fully integrated into all decision-making and planning processes.* *c. Bank has a low risk appetite for operational risks so it needs continuous improvement in the Quality of Risk Identification and Control.* *d. Strong risk management for continuity of IT services.* *e. Maintain the implementation of IT projects according to a predetermined schedule.* *f. Strong Business Continuity Management (BCM) to minimise the impact of external events on HR, BNI services and assets.*
Legal Risk	*Minimizing potential losses due to legal issues in BNI's business activities.*

47. MANAJEMEN RISIKO (lanjutan)

Sebagai bagian dari Strategi Manajemen Risiko, BNI menetapkan *Risk Appetite Statement* (RAS). RAS merupakan jenis dan tingkat risiko yang sanggup diambil/dihadapi Bank yang berada dalam kapasitas risiko yang dimiliki dalam rangka mencapai tujuan bisnis. Adapun *Risk Appetite Statement* BNI sebagai berikut: (lanjutan)

Risk Appetite	*Risk Appetite Statement*
Risiko Stratejik	a. Menghasilkan pendapatan yang berkelanjutan dengan risiko yang terjaga. b. Memelihara kecukupan permodalan berada di atas ketentuan minimum regulator dan memenuhi kebutuhan saat normal maupun krisis. c. Menjaga kinerja bisnis yang berkelanjutan dengan risiko yang terjaga. d. Menjaga Tingkat Kesehatan Bank minimal pada predikat Sehat.
Risiko Kepatuhan	Meminimalisir secara berkelanjutan denda dari Regulator sehingga menurun dari waktu ke waktu.
Risiko Reputasi	a. Menjaga *rating* BNI tetap *investment grade*. b. Meningkatkan kepercayaan dan persepsi positif melalui *Customer Journey* untuk mendukung pertumbuhan bisnis.

Agar penerapan manajemen risiko dapat berjalan secara efektif, BNI menyusun *Risk Governance* sebagai bagian dari sistem Tata Kelola Perusahaan (*Corporate Governance*) yang fokus pada struktur, proses dan pendekatan pengelolaan risiko dalam upaya pencapaian tujuan bisnis.

Inisiatif dan langkah-langkah penyempurnaan telah dilakukan untuk meletakkan landasan yang kuat dalam manajemen risiko di BNI yang mencakup aspek-aspek organisasi, strategi, sistem informasi dan operasi, serta pengembangan sumber daya manusia. BNI juga telah melakukan langkah-langkah antisipatif yang menyentuh aspek humanis dan personal setiap individu BNI, yaitu dengan membangun budaya risiko yang kuat yang merupakan bagian dari budaya perusahaan BNI. BNI terus berupaya untuk meningkatkan budaya risiko segenap insan BNI agar tercipta budaya risiko yang kuat.

Terkait dengan produk atau aktivitas baru yang akan diterbitkan, penilaian yang komprehensif dilakukan terhadap risiko yang melekat pada produk atau aktivitas baru untuk memastikan bahwa potensi risiko yang mungkin timbul telah dimitigasi dengan baik.

Pengelolaan risiko kredit, risiko likuiditas, risiko pasar dan operasional BNI sebagaimana diuraikan pada Catatan 48 sampai dengan Catatan 51 adalah sesuai dengan definisi dari Regulator (tidak diaudit).

***47. RISK MANAGEMENT** (continued)*

As part of the Risk Management Strategy, BNI establishes a Risk Appetite Statement (RAS). RAS is the type and level of risk that a Bank can take/face within its risk capacity in order to achieve business objectives. The BNI Risk Appetite Statement is as follows: (continued)

Risk Appetite	*Risk Appetite Statement*
Strategic Risk	*a. Generate sustainable income with manageable risk.* *b. Maintaining capital adequacy that is above the minimum regulatory requirements and meets needs during normal and crisis times.* *c. Maintain sustainable business performance with controlled risks.* *d. Maintaining the Bank's Health Level at a minimum of the Healthy predicate.*
Compliance Risk	*Minimising on an ongoing basis fines from Regulators so that they decrease over time.*
Reputation Risk	*a. Maintaining BNI's investment grade rating.* *b. Increase trust and positive perceptions through Customer Journey to support business growth.*

Risk Governance is formed to enforce the effectiveness of risk management implementation, and as a part of Corporate Governance system, which focuses on structure, process and approach to risk management in achieving the business goals.

Initiatives and corrective actions have been taken to build a solid foundation for BNI's risk management, covering aspect of organization, strategies, information system and operations, and human capital. BNI has taken some anticipatory actions related to humanity and personal aspects of each individual of BNI by implementing risk culture enhancement to build a strong risk culture that is part of the BNI's company culture. BNI constantly strives to improve employee's risk culture in order to create a strong risk culture.

Related to new product or activity, a comprehensive assessment for each of inherent risk in those new product or activity is done to ensure the potential risk that may occur is mitigated.

The management of BNI's credit, liquidity, market and operational risks, as described in Notes 48 to 51 are consistent with Regulator's definition (unaudited).

48. RISIKO KREDIT

Pengelolaan kredit Bank diarahkan untuk melakukan ekspansi kredit dan mengelola kualitas setiap kredit sejak saat diberikan sampai dengan dilunasi oleh debitur dan untuk mencegah kredit tersebut menjadi kredit bermasalah (*Non-Performing Loan/NPL)*. Pengelolaan kredit yang efektif dapat meminimalkan kerugian dan mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

Pengelolaan risiko kredit BNI selain bertujuan untuk memenuhi persyaratan yang ditetapkan oleh Regulator, juga untuk meminimalkan kemungkinan kerugian yang timbul akibat debitur gagal memenuhi kewajibannya atas fasilitas kredit yang diberikan dan kontrak keuangan lainnya, baik pada tingkat individu debitur maupun portofolio kredit secara keseluruhan.

BNI telah memiliki kebijakan dan prosedur perkreditan serta kebijakan manajemen risiko kredit yang diputuskan melalui forum Komite Kebijakan Perkreditan (KKP), Komite Prosedur Perkreditan (KPP), Komite Manajemen Risiko dan *Anti Fraud* sub Komite Manajemen Risiko (KRA-RMC) yang beranggotakan Direksi dan beberapa anggota manajemen senior serta Rapat Direksi (Radisi) serta disetujui oleh Dewan Komisaris. Kebijakan Perkreditan Bank disetujui oleh Dewan Komisaris dan ditinjau paling lama setiap 3 (tiga) tahun sekali. Selanjutnya kebijakan dan prosedur tersebut dituangkan dalam Pedoman Perusahaan (PP) Perkreditan dan Pedoman Perusahaan Manajemen Risiko Kredit.

Pedoman Perusahaan (PP) Perkreditan memberikan pedoman secara lengkap dan terperinci atas kegiatan manajemen kredit dari saat pengajuan kredit, proses analisis, persetujuan, pemantauan, pendokumentasian, pengendalian, penyelamatan/restrukturisasi dan penyelesaian kredit bermasalah, sehingga kualitas kredit dapat terjaga dengan tetap memperhatikan target bisnis yang ditetapkan (tidak diaudit).

Dalam rangka mendukung proses pemberian kredit yang lebih hati-hati, BNI melakukan penelaahan dan penyempurnaan kebijakan perkreditan dan kebijakan manajemen risiko kredit secara periodik sesuai dengan perkembangan bisnis terkini.

48. CREDIT RISK

The Bank's loan management is aimed to support the loan expansion and to manage the quality of each loan from the time the loan was granted until the loan is fully repaid by the debtors and to prevent the loan becoming a Non-Performing Loan (NPL). Effective loan management is intended to minimise the risk of losses and optimise the use of capital allocated for credit risk.

The purpose of BNI's credit risk management other than to comply with Regulatory requirement is to minimise the possible losses resulting from the debtors' failure to pay credit facility and other financial contracts at the minimum level, both on the individual and loan portfolio level.

BNI already has loan policies and procedures for credit and credit risk management that was decided in the Credit Policy Committee (KKP), Credit Procedures Committee (KPP), Risks Management and Anti Fraud Committee sub division of Risk Management (KRA-RMC) consisting of Board of Directors and several members of senior management and also Board of Directors meetings and approved by Board of Commissioner. Bank Credit Policies is approved by Board of Commissioner and reviewed at least once in 3 (three) years. These policies and procedures are written in the Credit Company Guidelines (PP) and Credit Risk Management Company Guidelines.

These Credit Company Guidelines (PP) provide complete and detailed guidance on loan management activities from loan proposal, analysis process, approval, monitoring, documentation, controls, restructuring and the settlements of non-performing loans, so that credit quality can be maintained by taking into account the business targets set (unaudited).

To support a prudent loan granting process, BNI conducts periodic reviews and enhances its loan and credit risk management policies in line with current business developments.

48. RISIKO KREDIT (lanjutan)

Pengelolaan risiko kredit diterapkan pada tingkat individu dan tingkat portofolio. Pada tingkat individu pinjaman untuk kredit produktif, setiap usulan pemberian kredit dilakukan melalui proses analisis kredit oleh Unit Bisnis dan ditinjau oleh unit risiko kredit. Mekanisme proses persetujuan kredit dilakukan melalui rapat Komite Kredit. Komite Kredit merupakan lembaga pemutus kredit yang beranggotakan pemutus dari Unit Bisnis dan Unit Risiko Bisnis, dengan demikian proses pemberian kredit menjadi lebih komprehensif dan hati-hati.

Untuk mempercepat proses ekspansi bisnis segmen kecil, fungsi pemasaran dan proses analisa kredit dilakukan oleh *Relationship Manager* yang berada di bawah Unit Bisnis yaitu dengan melakukan analisa bisnis dan analisa risiko serta memberikan mitigasi risiko yang diperlukan terhadap calon debitur yang diusulkan.

Adapun untuk segmen menengah dan korporasi dilakukan oleh *Relationship Manager* dan *Business Analyst* yang berada di Unit Bisnis dengan tugas memproses usulan dari calon debitur, sementara analisis dan *review* risiko calon debitur di segmen Korporasi dan Menengah dilakukan oleh fungsi *Credit Risk Manager* yang berada di bawah Unit Risiko.

Penerapan *four eyes principles* dalam proses perkreditan di BNI diimplementasikan dalam proses persetujuan kredit yang dilakukan melalui Komite Kredit, yaitu forum bersama pejabat pemutus kredit yang mempunyai wewenang memutus kredit yang diusulkan sesuai dengan limit yang ditetapkan. Anggota Komite Kredit terdiri dari pejabat unit bisnis dan unit risiko bisnis. Dengan demikian proses pemberian kredit menjadi lebih komprehensif dan hati-hati.

Unit bisnis dan unit risiko bisnis berperan sebagai *first line of defense (risk owner)* yang bertugas mengelola dan mengendalikan risiko kredit pada kegiatan operasional harian unit tersebut.

Proses analisis dan persetujuan kredit dilakukan melalui serangkaian proses penilaian tingkat risiko kredit calon debitur, yang diantaranya dengan menggunakan *internal rating system* (untuk kredit produktif) dan *credit scoring* pada *decision engine iDEAS* yang telah terintegrasi dengan *Loan Origination System* (untuk kredit konsumtif dan kredit produktif segmen ritel sampai dengan Rp5 miliar), sekaligus juga strategi mitigasi risikonya. Hasil proses analisis dan penilaian tingkat risiko kredit kemudian diajukan kepada Komite Kredit untuk mendapatkan persetujuan.

***48. CREDIT RISK** (continued)*

Credit risk management is implemented both at the individual and portfolio level. At the individual level, for productive loans, each loan granting proposal is made through a process of analysis by the Business Unit and reviewed by the credit risk unit. The credit approval process mechanism is through a Credit Committee meeting. The Credit Committee constitutes the decision maker for credit approval, which consists of representatives from Business Units and the Credit Risk Unit, so that the loan granting process becomes more comprehensive and prudent.

To accelerate the process of business expansion in small segment, the marketing and credit analysis process function is performed by the Relationship Manager under the Business Unit by conducting business analysis and risk analysis as well as providing risk mitigation against the proposed debtor candidates.

As for the middle and corporate segment these are performed by Relationship Managers and Business Analyst who are in the Business Unit and have the task of processing the proposals from prospective debtors, while the analysis and risk review of prospective debtors in the Corporate and Middle segment are performed by Credit Risk Manager who is under the Risk Unit.

The application of four eyes principles in the lending process at BNI is implemented in the credit approval process through Credit Committees, that is a forum of credit decision makers who have the authority to approve the credit in accordance with the specified limit. The members of the Credit Committee consist of business unit officers and business risk unit officers. Thus the process of granting credit becomes more comprehensive and prudent.

Business units and business risk units act as first line of defense (risk owner) in charge of managing and controlling credit risk in daily operations of the unit.

Loan analysis and approval process is conducted through several assessment processes of the applicant's credit risks, i.e. through internal rating system (for productive loans) and credit scoring on the iDEAS decision engine which has been integrated with Loan Origination System (for consumer loans and productive retail loans up to IDR5 billion), followed by the related risk mitigation strategy. The results of the credit analysis and risk assessment process will be forwarded to the Credit Committee for approval.

48. RISIKO KREDIT (lanjutan)

Kredit yang bermasalah dikelola oleh Divisi *Corporate Remedial & Recovery* untuk segmen Korporasi, Divisi *Enterprise & Commercial Remedial & Recovery* untuk segmen *Enterprise*, Komersial dan Ritel produktif serta Divisi *Retail Collection & Recovery* untuk segmen Konsumer dan Program, agar penyelamatan/penyelesaian kredit dapat dilakukan secara lebih baik dan memampukan Unit Usaha untuk dapat fokus pada pengelolaan debitur lancar dan melakukan ekspansi kredit.

Untuk menjaga agar portofolio Bank tidak terkonsentrasi pada debitur dan sektor ekonomi tertentu, maka telah ditetapkan pembatasan kredit sesuai *risk appetite*, sedangkan untuk mengantisipasi pelampauan BMPK BNI telah menetapkan limit BMPK yang disebut *house limit* dengan batas yang lebih *prudent* dibandingkan limit BMPK sesuai ketentuan regulator.

Untuk mengatur komposisi portofolio pinjaman BNI, setiap tahun sekali ditetapkan batas maksimum pinjaman (*Loan Exposure Limit*) yang bertujuan untuk mendiversifikasi portofolio pinjaman berdasarkan sektor industri dan sub sektor industri untuk mengoptimalkan pendapatan dengan mempertimbangkan risiko di masing-masing sektor industri serta mengurangi risiko konsentrasi. Dalam penentuan konsentrasi tiap sektor industri yang optimal, Bank mengembangkan metode *Credit Portfolio Optimisation* (CPO) dengan memperhitungkan korelasi *risk-return* dari tiap sektor industri. Selanjutnya Bank memonitor status kelonggaran ekspansi pinjaman (*space available*) secara periodik berdasarkan *Loan Exposure Limit* (LEL).

Pengembangan manajemen risiko kredit dilakukan secara bertahap sesuai dengan kerangka kerja yang ditetapkan Otoritas Jasa Keuangan. Sejak 1 Januari 2023, BNI telah mengimplementasikan perhitungan ATMR Risiko Kredit dengan pendekatan Standar sesuai SEOJK No.24/SEOJK.03/2021 tentang Perhitungan Aset Tertimbang Menurut Risiko Untuk Risiko Kredit Dengan Menggunakan Pendekatan Standar Bagi Bank Umum (tidak diaudit).

Sebagai bagian dari pengukuran risiko kredit dan untuk mengantisipasi terjadinya perubahan faktor makro yang berpengaruh pada Bank, BNI secara berkala melakukan *stress testing* risiko kredit untuk menilai perubahan portofolio kredit dan pengaruhnya bagi Bank serta kemampuan Bank menghadapi kondisi tersebut.

***48. CREDIT RISK** (continued)*

Non-performing loan is managed by Corporate Remedial & Recovery Division for corporate segment, Enterprise & Commercial Remedial & Recovery Division for Enterprise, Commercial & productive Retail and Retail Collection & Recovery Division for Consumer and Program segment, to ensure better credit recovery and settlement, and to enable the Business Unit to focus on the management of performing debtors and loan expansion.

To prevent the Bank portfolio from being concentrated to certain debtors and economic sectors, credit restrictions have been set according to the risk appetite, while to anticipate exceeding the Legal Lending Limit, BNI has set limits on the Maximum Limit of Credit License called House Limit with a more prudent limit than the limit of Maximum Credit Granting in accordance with the provisions of the regulator.

To manage the composition of BNI loan portfolio, the loan exposure limit is determined annually to diversify loan portfolio among different industry sectors and industry sub sector in order to optimise return regarding risk in each sector and to reduce concentration risk. In the determination of optimal concentration in industry sectors, the Bank has developed a method of Credit Portfolio Optimisation (CPO) by calculating the correlation of risk return from each industry sectors. Furthermore, the Bank monitors the status of the space available based on Loan Exposure Limit (LEL) periodically.

The development of credit risk management is conducted in stages, and in line with the framework set by Financial Service Authority. As of 1 January 2023, BNI has implemented the calculation of Credit Risk Weighted Assets using the standard approach according to SEOJK No.24/SEOJK.03/2021 concerning Calculation of Risk Weighted Assets for Credit Risk Using a Standard Approach for Commercial Banks (unaudited).

As part of the measurement of credit risk and to anticipate the occurrence of macro-factors changes affecting the Bank, BNI periodically performs stress testing of credit risk to assess changes in loan portfolio and its impact to the Bank and the Bank's ability to face such condition.

48. RISIKO KREDIT (lanjutan)

(i) Eksposur maksimum risiko kredit.

Eksposur risiko kredit terhadap aset-bersih sesudah cadangan kerugian penurunan nilai pada laporan posisi keuangan konsolidasian pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

***48. CREDIT RISK** (continued)*

(i) Maximum exposure of the credit risk.

Credit risk exposures relating to the assets-net of allowance for impairment losses on the consolidated statement of financial position as of 31 December 2024 and 2023 are as follows:

Keterangan	Eksposur maksimum/ *Maximum exposure* 2024	2023	*Description*
Giro pada Bank Indonesia	51,669,054	65,256,432	*Current accounts with Bank Indonesia*
Giro pada bank lain	22,074,173	35,022,762	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	17,075,441	43,794,166	*Placements with other banks and Bank Indonesia*
Efek-efek			*Marketable securities*
- Nilai wajar melalui laporan laba rugi	23,959,614	9,759,264	*Fair value through profit or loss -*
- Nilai wajar melalui penghasilan komprehensif lain	24,181,607	27,039,672	*Fair value through other - comprehensive income*
- Biaya perolehan diamortisasi	387,017	361,374	*Amortised cost -*
Efek-efek yang dibeli dengan janji dijual kembali	7,971,923	13,951,344	*Securities purchased under agreement to resell*
Wesel ekspor dan tagihan lainnya	13,243,026	18,998,994	*Bills and other receivables*
Tagihan akseptasi	15,925,521	17,091,194	*Acceptance receivables*
Pinjaman yang diberikan	737,187,258	647,926,638	*Loans*
Obligasi Pemerintah			*Government Bonds*
- Nilai wajar melalui laba rugi	3,957,073	4,187,772	*Fair value through profit or loss -*
- Nilai wajar melalui penghasilan komprehensif lain	90,900,188	86,547,352	*Fair value through other - comprehensive income*
- Biaya perolehan diamortisasi	37,207,067	36,361,761	*Amortised cost -*
Aset lain-lain - bersih*)	9,165,837	11,044,503	*Other assets - net*)*
	1,054,904,799	**1,017,343,228**	

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain dan piutang nasabah - Entitas anak.

*) *Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and receivables from customers - Subsidiary.*

Eksposur risiko kredit terhadap rekening administratif konsolidasian pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

Credit risk exposures relating to consolidated administrative accounts items as of 31 December 2024 and 2023 are as follows:

Keterangan	Eksposur maksimum/ *Maximum exposure* 2024	2023	*Description*
Fasilitas kredit kepada debitur yang belum digunakan	57,552,807	55,883,261	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	9,952,660	16,854,306	*Outstanding irrevocable letters of credit*
Garansi yang diterbitkan	73,450,980	66,777,131	*Guarantees issued*
	140,956,447	**139,514,698**	

48. RISIKO KREDIT (lanjutan)

(i) Eksposur maksimum risiko kredit (lanjutan)

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Grup pada tanggal 31 Desember 2024 dan 2023. Untuk aset pada laporan posisi keuangan konsolidasian, eksposur di atas ditentukan berdasarkan nilai tercatat bersih seperti yang diungkapkan pada laporan posisi keuangan konsolidasian.

Pada tanggal 31 Desember 2024 dan 2023, masing-masing sebesar 69.88% dan 63,65% adalah jumlah eksposur risiko kredit maksimum terhadap aset pada laporan posisi keuangan konsolidasian yang berasal dari pinjaman yang diberikan.

Manajemen yakin akan kemampuan Bank untuk mengendalikan dan memelihara eksposur risiko kredit yang berasal dari kredit yang diberikan, berdasarkan hal-hal sebagai berikut:

- Proses peningkatan pengelolaan kredit secara berkelanjutan melalui penyempurnaan *end to end credit process*, pengembangan produk penyempurnaan organisasi perkreditan, peningkatan kemampuan SDM di bidang perkreditan dan pengembangan perangkat kredit berbasis teknologi.
- BNI telah memiliki pedoman tertulis mengenai kebijakan dan proses kredit yang mencakup seluruh aspek pemberian kredit yang dilakukan. Setiap pemberian kredit harus senantiasa mengacu pada kebijakan tersebut.
- BNI telah menetapkan *risk appetite* dan *risk tolerance* yang selaras dengan sasaran strategis Bank, yang digunakan sebagai acuan tingkat risiko yang akan diambil Bank dalam pencapaian sasaran bisnis.
- BNI telah melakukan *stress test* risiko kredit untuk menilai kemampuan Bank bertahan dalam kondisi tidak normal serta sebagai alat untuk pengambilan keputusan Bank.
- BNI telah memiliki sistem deteksi dini permasalahan melalui "*early warning system*" dan pemantauan yang disiplin.
- Seluruh kredit diberikan dengan agunan kecuali untuk jenis kredit tertentu seperti kartu kredit, *personal loans* dan fasilitas antar bank.

***48. CREDIT RISK** (continued)*

(i) Maximum exposure of the credit risk (continued)

The table above represents credit risk exposures of the Group as of 31 December 2024 and 2023. For assets on the consolidated statement of financial position, the exposures set out above are based on net carrying value as reported in the consolidated statement of financial position.

As of 31 December 2024 and 2023, the total maximum credit risk exposure toward asset in the consolidated statement of financial position from loans is 69.88% and 63.65%, respectively.

Management is confident in its ability to control and sustain exposure of credit risk to the Bank resulting from its loans based on the following:

- *The process of improving credit management in a sustainable manner by improving end to end credit process, product development credit organization improvement, credit capability improvement of human resources and development of technology based for credit application.*
- *BNI has documented credit policies and manual procedures that cover all aspects of the Bank's lending activities. Each loan transaction must adhere to the requirements of the Bank's policy.*
- *BNI has set risk appetite and risk tolerance in accordance with the Bank's strategic objectives, which are used as a reference level of risk to be taken by the Bank in achieving business goals.*
- *BNI has performed stress test on credit risk to assess the ability of the Bank to stay in the abnormal condition and as an instrument for decision making for the Bank.*
- *BNI has an early problem detection system through "early warning system" and disciplined monitoring.*
- *All loans are secured by collaterals, except for certain loans such as credit cards, personal loans and interbank loans.*

48. RISIKO KREDIT (lanjutan)

(ii) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya

BNI menentukan struktur kredit termasuk penentuan *covenant* yang tepat sesuai kebutuhan dan kondisi debitur, sehingga kredit yang diberikan benar-benar efektif dan menguntungkan bagi debitur maupun Bank. Jenis agunan yang yang dimiliki oleh Bank adalah kas, deposito, agunan yang diikat dengan hipotik dan hak tanggungan, garansi/ penjaminan pihak ketiga (termasuk penjaminan kredit oleh perusahaan asuransi) serta jaminan dalam bentuk aset lainnya. Perkiraan nilai wajar dari agunan yang digunakan oleh Bank didasarkan pada nilai agunan yang dinilai oleh penilai internal maupun eksternal.

Ketentuan *coverage* atau kecukupan agunan untuk tiap segmen ditentukan sebagai berikut: (tidak diaudit)

***48. CREDIT RISK** (continued)*

(ii) Analysis of maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation

BNI sets loan structure for every debtor through appropriate covenants that aligns with debtor needs and condition. This is to ensure the debtor uses the loan according to its original purpose so that the Bank and the debtor's interests are fulfilled. Collateral types held by the Bank are cash, deposits, registered mortgages, guarantees and other registered securities over assets. Estimates of fair value of collaterals held by the Bank is based on the value of collaterals assessed internally or externally by the independent appraisers.

The collateral coverage criteria for each segment is divided as follows: (unaudited)

Segmen/*Segment*	Jenis Agunan/*Collateral*	Jumlah *Coverage* Minimal / *Minimum Coverage Amount*
Korporasi/ *Wholesale*	Aset tetap/*Fixed Asset*	100% dari limit kredit/*from credit limit*
	Kas/*Cash*	
	Standby letter of credit ("SBLC")	
	Tanah dan Bangunan/*Land and Building*	
	Piutang/*Receivable*	
	Kendaraan/*Vehicle*	
	Agunan lain yang diterima oleh Bank/*Other collaterals held by the Bank*	
Menengah/ *Middle*	Aset tetap/*Fixed Asset*	125% dari limit kredit/*from credit limit*
	Kas/*Cash*	
	SBLC	
	Tanah dan Bangunan/*Land and Building*	
	Piutang/*Receivable*	
	Kendaraan/*Vehicle*	
	Agunan lain yang diterima oleh Bank/*Other collaterals held by the Bank*	
Kecil/*Retail*	Aset tetap/*Fixed Asset*	110% dari limit kredit/*from credit limit*
	Kas/*Cash*	
	SBLC	

Nilai tercatat dari aset keuangan bank selain kredit yang diberikan dan efek-efek yang dibeli dengan janji dijual kembali pada umumnya menggambarkan eksposur maksimum atas risiko kredit.

The carrying amounts of financial assets other than bank loans and securities purchased under agreements to resell is generally equal to the maximum exposure of credit risk.

48. RISIKO KREDIT (lanjutan)

(ii) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya (lanjutan)

Tabel di bawah ini menunjukkan eksposur maksimum bersih atas risiko kredit untuk efek-efek yang dibeli dengan janji dijual kembali pada tanggal-tanggal 31 Desember 2024 dan 2023:

***48. CREDIT RISK** (continued)*

(ii) Analysis of maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation. (continued)

The table below shows the net maximum exposure to credit risk on securities purchased under agreements to resell on 31 December 2024 and 2023:

	2024			
Keterangan	**Eksposur maksimum/ *Maximum exposure***	**Agunan/ *Collateral***	**Eksposur Bersih/ *Net Exposure***	***Description***
Efek-efek yang dibeli dengan janji dijual kembali	7,971,923	8,226,650	(254,727)	*Securities purchased under agreements to resell*

	2023			
Keterangan	**Eksposur maksimum/ *Maximum exposure***	**Agunan/ *Collateral***	**Eksposur Neto/ *Net Exposure***	***Description***
Efek-efek yang dibeli dengan janji dijual kembali	13,951,344	14,102,758	(151,414)	*Securities purchased under agreements to resell*

(iii) Informasi kualitas kredit atas aset keuangan per tanggal 31 Desember 2024 dan 2023 sebagai berikut:

(iii) The information on the credit quality of financial assets as of 31 December 2024 and 2023 are as follows:

	2024								
	Belum jatuh tempo atau tidak mengalami penurunan nilai/ *Neither past due nor impaired*					**Jatuh tempo dan tidak mengalami penurunan nilai/ *Past-due but not impaired***	**Mengalami penurunan nilai/ *Impaired***	**Total**	
	Grup 1/ *Group 1*	**Grup 2/ *Group 2***	**Grup 3/ *Group 3***	**Grup 4/ *Group 4***	**Grup 5/ *Group 5***				
Giro pada Bank Indonesia	-	51,669,054	-	-	-	-	-	51,669,054	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	22,074,186	-	-	-	-	-	22,074,186	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	3,439,474	13,636,161	-	-	-	-	-	17,075,635	*Placements with other banks and Bank Indonesia*
Efek-efek	23,030,204	25,187,153	-	-	-	-	316,989	48,534,346	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	7,281,260	690,663	-	-	-	-	-	7,971,923	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	4,216,205	9,079,649	-	-	-	-	-	13,295,854	*Bills and other receivables*
Tagihan akseptasi	147,257	10,682,441	3,815,368	-	1,321,400	52,304	-	16,018,770	*Acceptance receivables*
Pinjaman yang diberikan									*Loans*
Modal kerja	24,151,410	313,967,462	9,949,258	135,707	23,209,245	18,612,263	9,745,230	399,770,575	*Working capital*
Investasi	6,695,321	108,089,121	4,522,200	30,826	6,926,294	2,764,903	2,594,234	131,622,899	*Investment*
Konsumen	15,313,455	110,549,579	9,333,575	668,108	2,467,561	3,261,194	2,866,799	144,460,271	*Consumer*
Sindikasi	811,737	89,539,671	136,379	-	1,700,791	4,912,686	19,846	97,121,110	*Syndicated*
Karyawan	7,840	2,726,811	105,998	10,944	1,091	14,892	26,695	2,894,271	*Employee*
Program Pemerintah	-	2,652	-	-	-	-	-	2,652	*Government programs*
Obligasi Pemerintah	7,948,761	124,122,808	-	-	-	-	-	132,071,569	*Government Bonds*
Aset lain-lain – bersih*)	-	9,165,837	-	-	-	-	-	9,165,837	*Other assets – net*)*
Total	**93,042,924**	**891,183,248**	**27,862,778**	**845,585**	**35,626,382**	**29,618,242**	**15,569,793**	**1,093,748,952**	***Total***
Cadangan kerugian penurunan nilai								(38,834,065)	*Allowance for impairment losses*
Bersih								**1,054,914,887**	***Net***

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM, piutang lain-lain dan kartu kredit dan piutang nasabah - Entitas anak.

*) *Other assets – net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and receivables from customers - Subsidiary.*

48. RISIKO KREDIT (lanjutan)

***48. CREDIT RISK** (continued)*

(iii) Informasi kualitas kredit atas aset keuangan per tanggal 31 Desember 2024 dan 2023 sebagai berikut: (lanjutan)

(iii) The information on the credit quality of financial assets as of 31 December 2024 and 2023 are as follows: (continued)

	2023								
	Belum jatuh tempo atau tidak mengalami penurunan nilai/ *Neither past due nor impaired*					Jatuh tempo dan tidak mengalami penurunan nilai/ *Past-due but not impaired*	Mengalami penurunan nilai/ *Impaired*	Total	
	Grup 1/ *Group 1*	Grup 2/ *Group 2*	Grup 3/ *Group 3*	Grup 4/ *Group 4*	Grup 5/ *Group 5*				
Giro pada Bank Indonesia	-	65,256,432	-	-	-	-	-	65,256,432	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	35,022,769	-	-	-	-	-	35,022,769	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	40,378,216	3,416,048	-	-	-	-	-	43,794,264	*Placements with other banks and Bank Indonesia*
Efek-efek	9,458,882	27,706,008	-	-	-	-	242,790	37,407,680	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	8,770,692	5,180,652	-	-	-	-	-	13,951,344	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	5,656,544	13,620,951	-	-	-	-	-	19,277,495	*Bills and other receivables*
Tagihan akseptasi	133,917	15,598,617	251,132	-	1,585,009	-	-	17,568,675	*Acceptance receivables*
Pinjaman yang diberikan									*Loans*
Modal kerja	18,408,118	270,735,291	7,445,718	67,725	26,475,606	21,084,484	8,669,019	352,885,961	*Working capital*
Investasi	5,306,583	90,546,012	3,977,560	37,227	9,524,570	4,252,563	3,970,994	117,615,509	*Investment*
Konsumen	13,541,275	92,995,563	9,237,358	364,107	2,543,918	2,553,524	2,081,269	123,317,014	*Consumer*
Sindikasi	1,842,840	85,184,057	2,855,292	-	1,702,494	5,995,634	19,846	97,600,163	*Syndicated*
Karyawan	3,380	3,364,755	150,610	4,973	2,046	14,555	94,423	3,634,742	*Employee*
Program Pemerintah	-	31,380	-	-	-	-	-	31,380	*Government programs*
Obligasi Pemerintah	9,572,999	117,527,370	-	-	-	-	-	127,100,369	*Government Bonds*
Aset lain-lain – bersih*)	-	11,701,003	-	-	-	-	-	11,701,003	*Other assets – net*)*
Total	**113,073,446**	**837,886,908**	**23,917,670**	**474,032**	**41,833,643**	**33,900,760**	**15,078,341**	**1,066,164,800**	***Total***
Cadangan kerugian penurunan nilai								(48,158,663)	*Allowance for impairment losses*
Bersih								**1,018,006,137**	***Net***

*) Aset lain-lain – bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit dan piutang lain-lain.

**) Other assets – net consist of interest receivables, receivables from transactions related to ATM and credit card and other receivables.*

Pengelompokkan kualitas kredit atas aset keuangan berdasarkan kebijakan internal Grup adalah sebagai berikut:

- **Grup 1** : Debitur baru (kurang dari 6 bulan).
- **Grup 2** : Nasabah lama yang tidak memiliki historis pernah menunggak dalam 3 tahun terakhir.
- **Grup 3** : Nasabah lama yang memiliki historis pernah menunggak (dibawah 90 hari) dalam 3 tahun terakhir.
- **Grup 4** : Nasabah lama yang memiliki historis pernah menunggak diatas 90 hari dalam 3 tahun terakhir.
- **Grup 5** : Nasabah lama yang pinjamannya pernah/telah direstrukturisasi.

The credit quality classifications of financial assets based on the Group's internal policies are as follows:

- ***Group 1** : New customers (less than 6 months).*
- ***Group 2** : Existing customers with no history of overdue for the past 3 years.*
- ***Group 3** : Existing customers with history of overdue below 90 days in the past 3 years.*
- ***Group 4** : Existing customers with history of default more than 90 days in the past 3 years.*
- ***Group 5** : Existing customers with loans that was/has been restructured.*

48. RISIKO KREDIT (lanjutan)

48. *CREDIT RISK* *(continued)*

(iv) Analisis umur pinjaman yang jatuh tempo tetapi tidak mengalami penurunan nilai pada tanggal 31 Desember 2024 dan 2023:

(iv) The aging analysis of past due but not impaired loans as 31 December 2024 and 2023:

	2024				
	Kurang dari 30 hari/ *Less than 30 days*	**31 sampai 60 hari/ *31 to 60 days***	**Lebih dari 60 hari/ *More than 60 days***	**Total**	
Modal kerja	432,936	1,522,980	16,656,347	18,612,263	*Working capital*
Investasi	45,311	9,800	2,709,792	2,764,903	*Investment*
Konsumen	150,284	640,029	2,470,881	3,261,194	*Consumer*
Sindikasi	-	-	4,912,686	4,912,686	*Syndicated*
Karyawan	1	-	14,891	14,892	*Employee*
Total	628,532	2,172,809	26,764,597	29,565,938	***Total***
Cadangan kerugian penurunan nilai	(234,532)	(312,537)	(15,886,181)	(16,433,250)	*Allowance for impairment losses*
Bersih	**394,000**	**1,860,272**	**10,878,416**	**13,132,688**	***Net***

	2023				
	Kurang dari 30 hari/ *Less than 30 days*	**31 sampai 60 hari/ *31 to 60 days***	**Lebih dari 60 hari/ *More than 60 days***	**Total**	
Modal kerja	754,109	505,625	19,824,750	21,084,484	*Working capital*
Investasi	41,080	40,932	4,170,551	4,252,563	*Investment*
Konsumen	35,764	546,984	1,970,776	2,553,524	*Consumer*
Sindikasi	-	-	5,995,634	5,995,634	*Syndicated*
Karyawan	127	4	14,424	14,555	*Employee*
Total	831,080	1,093,545	31,976,135	33,900,760	***Total***
Cadangan kerugian penurunan nilai	(432,039)	(220,420)	(20,884,338)	(21,536,797)	*Allowance for impairment losses*
Bersih	**399,041**	**873,125**	**11,091,797**	**12,363,963**	***Net***

(v) Konsentrasi risiko aset keuangan konsolidasian dengan eksposur risiko kredit

Tabel berikut menggambarkan rincian eksposur kredit Grup pada nilai tercatat (tanpa memperhitungkan agunan atau pendukung kredit lainnya), yang dikategorikan berdasarkan area geografis pada tanggal-tanggal 31 Desember 2024 dan 2023. Untuk tabel ini, Grup telah mengalokasikan eksposur area berdasarkan wilayah geografis tempat mereka beroperasi.

(v) Concentration of risks of consolidated financial assets with credit risk exposure

The following table provides details of the Group's credit exposures at their carrying amounts (without taking into account any collateral held or other credit support), as categorised by geographical region as of 31 December 2024 and 2023. For this table, the Group has allocated exposures to the regions based on the geographical area where activities are undertaken.

48. RISIKO KREDIT (lanjutan) / *48. CREDIT RISK (continued)*

(v) Konsentrasi risiko aset keuangan konsolidasian dengan eksposur risiko kredit (lanjutan). / *(v) Concentration of risks of consolidated financial assets with credit risk exposure (continued).*

	2024							
	Jawa & Bali	Sumatera	Kalimantan	Sulawesi	Indonesia Timur/ *East Indonesia*	Lain-lain *)/ *Others **)*	Total	
Giro pada Bank Indonesia	50,993,488	-	-	-	-	675,566	51,669,054	*Current accounts with Bank Indonesia*
Giro pada bank lain	8,763,015	5	11	5	6	13,311,144	22,074,186	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	9,526,846	-	-	-	-	7,548,789	17,075,635	*Placements with other banks and Bank Indonesia*
Efek-efek								*Marketable securities*
Nilai wajar melalui laba rugi	18,495,795	-	-	-	-	5,463,819	23,959,614	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehesif lain	20,955,867	-	-	-	-	3,231,575	24,187,442	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	300,000	-	-	-	-	87,290	387,290	*Amortised cost*
Efek-efek yang dibeli dengan janji dijual kembali	6,142,073	-	-	-	-	1,829,850	7,971,923	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	13,240,154	18,747	35,783	1,170	-	-	13,295,854	*Bill and other receivables*
Tagihan akseptasi	15,507,287	44,821	4,909	88,752	-	373,001	16,018,770	*Acceptance receivables*
Pinjaman yang diberikan	559,740,206	57,676,921	28,278,891	32,063,331	8,043,697	90,068,732	775,871,778	*Loans*
Obligasi pemerintah								*Government Bonds*
Nilai wajar melalui laba rugi	1,507,795	-	-	-	-	2,449,278	3,957,073	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehensif lain	68,548,658	-	-	-	-	22,355,783	90,904,441	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	26,615,754	-	-	-	-	10,594,301	37,210,055	*Amortised cost*
Aset lain-lain - bersih**)	6,212,394	469,693	40,097	632,808	9,926	1,800,919	9,165,837	*Other assets - net**)*
Total	**806,549,332**	**58,210,187**	**28,359,691**	**32,786,066**	**8,053,629**	**159,790,047**	**1,093,748,952**	***Total***
Cadangan kerugian penurunan nilai							(38,834,065)	*Allowance for impairment losses*
Neto							**1,054,914,887**	***Net***

	2023							
	Jawa & Bali	Sumatera	Kalimantan	Sulawesi	Indonesia Timur/ *East Indonesia*	Lain-lain *)/ *Others **)*	Total	
Giro pada Bank Indonesia	64,306,677	-	-	-	-	949,755	65,256,432	*Current accounts with Bank Indonesia*
Giro pada bank lain	15,013,952	5	12	6	6	20,008,788	35,022,769	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	40,360,778	-	-	-	-	3,433,486	43,794,264	*Placements with other banks and Bank Indonesia*
Efek-efek								*Marketable securities*
Nilai wajar melalui laba rugi	2,625,120	-	-	-	-	7,134,144	9,759,264	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehesif lain	22,972,680	-	-	-	-	4,071,421	27,044,101	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	542,790	-	-	-	-	61,525	604,315	*Amortised cost*
Efek-efek yang dibeli dengan janji dijual kembali	9,651,897	-	-	-	-	4,299,447	13,951,344	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	18,150,430	150,944	54,792	12,906	-	908,423	19,277,495	*Bill and other receivables*
Tagihan akseptasi	16,737,263	167,267	2,380	287,950	227	373,588	17,568,675	*Acceptance receivables*
Pinjaman yang diberikan	506,284,830	56,532,718	28,431,932	31,610,823	7,869,246	64,355,220	695,084,769	*Loans*
Obligasi pemerintah								*Government Bonds*
Nilai wajar melalui laba rugi	2,086,261	-	-	-	-	2,101,511	4,187,772	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehensif lain	68,781,674	-	-	-	-	17,767,658	86,549,332	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	16,335,373	-	-	-	-	20,027,892	36,363,265	*Amortised cost*
Aset lain-lain - bersih**)	9,514,266	413,927	38,414	386,724	10,971	1,336,701	11,701,003	*Other assets - net**)*
Total	**793,363,991**	**57,264,861**	**28,527,530**	**32,298,409**	**7,880,450**	**146,829,559**	**1,066,164,800**	***Total***
Cadangan kerugian penurunan nilai							(48,158,663)	*Allowance for impairment losses*
Neto							**1,018,006,137**	***Net***

*) Termasuk kantor cabang luar negeri dan Entitas Anak
**) Aset lain-lain – bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain, dan piutang nasabah - Entitas anak.

*) *Includes overseas branches and Subsidiaries*
**) *Other assets – net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables, and receivables from customers - Subsidiary.*

49. RISIKO LIKUIDITAS

Risiko likuiditas berhubungan dengan adanya kemungkinan Bank tidak mampu untuk memenuhi kewajiban jangka pendek terhadap deposan, investor dan kreditur, serta pemenuhan giro wajib minimum (GWM) yang diantaranya disebabkan keterbatasan akses pendanaan atau ketidakmampuan untuk melikuidasi aset yang dimiliki dengan harga yang wajar.

Manajemen Risiko Likuiditas dilakukan oleh Divisi Enterprise Risk Management (ERM), Divisi Treasury (TRS), dan Kantor Cabang Luar Negeri. Kebijakan dan Prosedur Risiko Likuiditas disusun oleh Divisi ERM, selanjutnya dilaksanakan oleh Divisi TRS dan segenap Kantor Cabang Luar Negeri, yang diwujudkan dalam manajemen strategi likuiditas.

Divisi ERM juga melakukan monitoring terhadap pelaksanaan manajemen likuiditas yang dilakukan oleh Divisi Treasury tersebut.

Divisi ERM menyusun Kebijakan Risiko Likuiditas berupa Pedoman Penerapan Manajemen Risiko Likuiditas, yang lebih lanjut dijabarkan ke dalam Prosedur Manajemen Risiko Likuiditas yang berisi panduan pelaksanaan manajemen risiko likuiditas, antara lain berupa:

a. Ketersediaan Alat Likuid: Kas, GWM, *Secondary Reserve*, *Early Warning Signal* (EWS) Likuiditas, *Liquidity Contingency Plan Head Office* maupun Kantor Cabang Luar Negeri;
b. Pengukuran Risiko Likuiditas : Rasio Likuiditas, Proyeksi Arus Kas, Profil Maturitas, Rasio Kecukupan Likuiditas dan *Stress testing;*
c. Pemantauan Risiko Likuiditas;
d. Pengendalian Risiko Likuiditas; dan
e. Penetapan Limit Likuiditas: Pagu Kas *Bank Wide* dan Wilayah (Rupiah dan Valas), *Safety Level*, Limit Profil Maturitas. Pembatasan Kredit Valas berdasarkan ketersediaan likuiditas valas.

Divisi ERM juga menyusun *risk appetite* dan *risk tolerance* Risiko Likuiditas yang selaras dengan sasaran strategis Bank, yang digunakan sebagai acuan tingkat risiko yang akan diambil Bank dalam pencapaian sasaran bisnis.

Dalam mengelola likuiditas, selain mengelola *primary reserve* (kas dan GWM), BNI menjaga dan mempertahankan *secondary reserve* untuk memastikan likuiditas berada pada level yang aman. Sebagai antisipasi pemenuhan *secondary reserve* yang ideal, BNI menjaga dan mempertahankan *tertiary reserve*.

49. LIQUIDITY RISK

Liquidity risk relates to the possibility that the Bank will be unable to meet short-term obligations to depositors, investors and creditors, as well as fulfill Statutory Reserve Requirements due to, among others, limited access to financing or the inability to liquidate assets at reasonable prices.

Liquidity Risk Management is carried out by the Enterprise Risk Management (ERM), Treasury Division (TRS), and Branch Offices of Foreign Affairs. Liquidity Risk Policies and Procedures was prepared by the ERM Division, subsequently implemented by the TRS Division and all Branch Offices of Foreign Affairs, which is manifested in the liquidity strategy management.

ERM Division also monitors the implementation of the liquidity management performed by the Treasury Division.

ERM Division prepares Liquidity Risk Policy Guidelines in Liquidity Risk Management Implementation Guidelines, which is further elaborated into the Liquidity Risk Management Procedures which contains guidelines for liquidity risk management practices, which include:

a. Availability Liquidity Tools: Cash, Statutory Reserve Requirement, Secondary Reserve, Early Warning Signal (EWS) for Liquidity, Liquidity Contingency Plan Head Office or Branch Office of Foreign Affairs;
b. Measurement of Liquidity Risk: Liquidity Ratio, Cash Flow Projection, Maturity Profile, Liquidity Adequacy Ratio and Stress testing;
c. Liquidity Risk Monitoring;
d. Liquidity Risk Management;
e. Determination of Liquidity Limit: Cash Ceiling Bank Wide and Regional Are (Rupiah and Valas), Safety Level, Maturity Profile Limit. Credit in Foreign Currency Limit based on the availability of liquidity for Foreign Currency.

ERM Division also prepares risk appetite and risk tolerance for Liquidity Risk in accordance with the Bank's strategic objectives, which are used as a reference level of risk to be taken by the Bank in achieving business goals.

In managing liquidity, beside addition to managing primary reserve (cash and statutory reserve requirement), BNI keeps and maintains secondary reserve to ensure liquidity is at a safe level. In anticipation of fulfilling the ideal secondary reserve, BNI preserves and maintains a tertiary reserve.

49. RISIKO LIKUIDITAS (lanjutan)

Penetapan dan pemantauan limit, yaitu *Safety Level* dan Pembatasan Kredit Valas berdasarkan ketersediaan Likuiditas Valas dilakukan secara berkala oleh Divisi ERM. Sedangkan ketersediaan atas keseluruhan *reserve* dipantau secara harian, mingguan, dan bulanan oleh Divisi TRS dan Divisi ERM.

Tabel di bawah ini menunjukkan sisa jatuh tempo kontraktual dari liabilitas keuangan berdasarkan *undiscounted cash flows.*

49. LIQUIDITY RISK (continued)

The setting and monitoring of limits, i.e. Safety Level and Credit Limitation for Foreign Currency based on the availability of Liquidity for Foreign Currency is conducted periodically by the ERM Division. While the availability of the whole reserve is monitored daily, weekly, and monthly by the TRS Division and the ERM Division.

The table below shows the remaining contractual maturities of the financial liabilities based on undiscounted cash flows.

2024

	Kurang dari 1 Bulan/ *Less than 1 Month*	1 - 3 Bulan/ *Months*	3 - 6 Bulan/ *Months*	6 - 12 Bulan/ *Months*	Lebih dari 12 Bulan/ *More than 12 Months*	Total	
LIABILITAS							***LIABILITIES***
Liabilitas segera	5,514,720	-	-	-	-	5,514,720	*Obligations due immediately*
Simpanan nasabah	659,303,325	79,978,318	37,378,681	30,280,627	1,583,846	808,524,797	*Deposits from customers*
Simpanan dari bank lain	14,395,602	1,443,612	1,262,723	1,414,936	31,591	18,548,464	*Deposits from other banks*
Liabilitas derivatif	1,479,185	-	-	-	-	1,479,185	*Derivative payables*
Liabilitas akseptasi	532,009	2,600,816	1,015,831	72,457	8,372	4,229,485	*Acceptance payables*
Efek-efek yang diterbitkan	-	80,625	4,293,079	246,704	10,637,428	15,257,836	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	9,689,028	49,678	136,599	186,278	6,679,566	16,741,149	*Securities sold under agreements to repurchase*
Pinjaman yang diterima	4,223,302	6,501,505	16,280,117	17,127,735	3,464,181	47,596,840	*Borrowings*
Efek-efek subordinasi	-	358,516	-	8,406,016	19,101,144	27,865,676	*Subordinated securities*
Liabilitas lain-lain*)	19,641,982	-	-	-	-	19,641,982	*Other liabilities*)*
Total	**714,779,153**	**91,013,070**	**60,367,030**	**57,734,753**	**41,506,128**	**965,400,134**	***Total***
Total aset lancar **)	**105,169,035**	**8,036,442**	**3,603,644**	**2,649,837**	**117,141,416**	**236,600,374**	***Total liquid assets**)***
KOMITMEN DAN KONTINJENSI							***COMMITMENT AND CONTINGENCIES***
Fasilitas kredit kepada debitur yang belum digunakan	57,552,807	-	-	-	-	57,552,807	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	2,864,725	4,637,284	843,350	368,650	1,238,651	9,952,660	*Outstanding irrevocable letters of credit*
Garansi yang diterbitkan	11,336,806	8,350,111	9,944,176	19,245,410	24,574,477	73,450,980	*Guarantees issued*
Total	**71,754,338**	**12,987,395**	**10,787,526**	**19,614,060**	**25,813,128**	**140,956,447**	***Total***

2023

	Kurang dari 1 Bulan/ *Less than 1 Month*	1 - 3 Bulan/ *Months*	3 - 6 Bulan/ *Months*	6 - 12 Bulan/ *Months*	Lebih dari 12 Bulan/ *More than 12 Months*	Total	
LIABILITAS							***LIABILITIES***
Liabilitas segera	5,294,952	-	-	-	-	5,294,952	*Obligations due immediately*
Simpanan nasabah	669,126,328	62,871,280	17,190,524	63,410,848	939,977	813,538,957	*Deposits from customers*
Simpanan dari bank lain	8,432,524	1,761,870	607,451	1,042,214	49,929	11,893,988	*Deposits from other banks*
Liabilitas derivatif	810,462	-	-	-	-	810,462	*Derivative payables*
Liabilitas akseptasi	216,460	1,059,755	371,901	2,833,350	1,267,081	5,748,547	*Acceptance payables*
Efek-efek yang diterbitkan	-	80,625	97,750	34,250	5,195,500	5,408,125	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	-	45,959	183,241	782,482	6,457,085	7,468,767	*Securities sold under agreements to repurchase*
Pinjaman yang diterima	2,180,351	3,118,741	1,879,318	9,317,895	17,893,124	34,389,429	*Borrowings*
Efek-efek subordinasi	-	342,968	342,968	685,936	18,272,775	19,644,647	*Subordinated securities*
Liabilitas lain-lain*)	18,512,179	-	-	-	-	18,512,179	*Other liabilities*)*
Total	**704,573,256**	**69,281,198**	**20,673,153**	**78,106,975**	**50,075,471**	**922,710,053**	***Total***
Total aset lancar **)	**133,755,042**	**23,078,513**	**1,509,876**	**7,770,428**	**116,267,177**	**282,381,036**	***Total liquid assets**)***

*) Liabilitas lain-lain terdiri dari utang ke pemegang polis, setoran jaminan, rekening dalam penyelesaian, utang reasuransi dan komisi, serta utang nasabah - Entitas Anak.

**) Aset lancar terdiri dari kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada bank lain dan Bank Indonesia dan Obligasi Pemerintah

*) *Other liabilities consist of obligation to policyholders, guarantee deposits, unsettled account, reinsurance payable and commission, and payable to customer - Subsidiary.*

**) *Liquid assets consist of cash, current accounts with Bank Indonesia, current accounts with other banks, placement with other banks and Bank Indonesia and Government Bonds.*

49. RISIKO LIKUIDITAS (lanjutan) / *49. LIQUIDITY RISK (continued)*

	2023						
	Kurang dari 1 Bulan/ *Less than 1 Month*	1 - 3 Bulan/ *Months*	3 - 6 Bulan/ *Months*	6 - 12 Bulan/ *Months*	Lebih dari 12 Bulan/ *More than 12 Months*	Total	
KOMITMEN DAN KONTINJENSI							***COMMITMENT AND CONTINGENCIES***
Fasilitas kredit kepada debitur yang belum digunakan	55,883,261	-	-	-	-	55,883,261	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	6,278,916	7,131,859	1,850,556	930,774	662,201	16,854,306	*Outstanding irrevocable letters of credit*
Garansi yang diterbitkan	10,774,762	6,876,173	5,998,340	15,338,665	27,789,191	66,777,131	*Guarantees issued*
Total	**72,936,939**	**14,008,032**	**7,848,896**	**16,269,439**	**28,451,392**	**139,514,698**	***Total***

Dalam rangka meningkatkan ketahanan likuiditas, BNI menerapkan perhitungan rasio kecukupan likuiditas yaitu *Liquidity Coverage Ratio* (LCR) dan *Net Stable Funding Ratio* (NSFR) dan mengelola rasio Kecukupan Likuiditas tersebut sesuai ketentuan regulator, baik secara individu (Entitas Induk) maupun konsolidasi dengan Entitas Anak (tidak diaudit).

In order to increase liquidity resilience, BNI implements Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) calculations and manages requirement of the Liquidity Adequacy Ratio subject to regulators, either individually (Parent Entity) or consolidated with Subsidiaries (unaudited).

LCR bertujuan untuk meningkatkan ketahanan likuiditas jangka pendek dengan memelihara *High Quality Liquid Assets* (HQLA) yang memadai untuk memenuhi kebutuhan likuiditas BNI selama periode 30 hari ke depan dalam kondisi *stress,* sedangkan NSFR bertujuan untuk mengurangi risiko likuiditas terkait sumber pendanaan untuk jangka waktu yang lebih panjang dengan mensyaratkan BNI mendanai aktivitas dengan sumber dana stabil yang memadai dalam rangka memitigasi risiko kesulitan pendanaan pada masa depan.

LCR aims to improve the Bank's short-term liquidity resilience by maintaining High Quality Liquid Assets (HQLA) to meet liquidity needs over the next 30 days under stress conditions, while NSFR aims to reduce liquidity risk related to longer term funding sources requiring BNI to fund activities with sufficient stable funding sources in order to mitigate future financial hardship risks.

Laporan rasio Kecukupan Likuiditas BNI tersebut dilaporkan secara bulanan dan triwulanan kepada Otoritas Jasa Keuangan (OJK) (tidak diaudit).

BNI Liquidity Adequacy Ratio are reported monthly and quarterly to the Otoritas Jasa Keuangan (OJK) (unaudited).

50. RISIKO PASAR / *50. MARKET RISK*

Risiko pasar adalah risiko kerugian yang timbul akibat perubahan faktor pasar yang tidak sesuai dengan posisi yang diambil oleh BNI baik pada posisi aset dan liabilitas keuangan dan rekening administratif. Risiko Pasar melekat pada hampir seluruh aktivitas Bank, baik *trading book* maupun *banking book* yang mencakup Risiko Suku Bunga dan Risiko Nilai Tukar.

Market risk is the risk of loss due to the adverse volatility of market price movements against BNI's financial assets and liabilities (on balance sheet) including administrative accounts (off balance sheet). Market risk is embedded in the Bank's business activities, both in trading and banking books, which cover Interest Rate risks and Foreign Exchange risks.

Pengelolaan Risiko Pasar BNI dilakukan melalui koordinasi beberapa Divisi terkait, yaitu Divisi Enterprise Risk Management (Divisi ERM) yang bertanggung jawab kepada Direktur Risk Management (Dir. RMT), Policy Governance (Divisi PGV) yang bertanggung jawab kepada Direktur Human Capital & Compliance (Dir. HCC), Divisi Treasury (Divisi TRS) dan Kantor Cabang Luar Negeri dalam pengawasan Divisi Internasional International & Financial Institution (Divisi INT) yang bertanggung jawab kepada Direktur Wholesale & International Banking (Dir. WHI). Dalam mengelola Risiko Pasar, Direksi didukung oleh *Risk Management Committee* (RMC) dan Komite Aset dan Liabilitas (ALCO) serta dalam pengawasannya didukung oleh Komisaris melalui Komite Pemantau Risiko.

Market Risk Management is done through coordination with BNI's several related divisions such as: Enterprise Risk Management Division (ERM) which report to the Director of Risk Management (Dir.RMT), Policy Governance Division (PGV) which report to the Director of Direktur Human Capital & Compliance (Dir. HCC), and Treasury Division (TRS) as well as Overseas branches supervised by the International & Financial Institutions Division (INT) which report to the Director of Wholesale & International Banking (Dir. WHI). The Market Risk Management is also supported by Risk Management Committee (RMC) and Assets and Liabilities Committee (ALCO) and supervised by the Board of Commissioners through the Risk Monitoring Committee.

50. RISIKO PASAR (lanjutan)

BNI telah memiliki Aplikasi Manajemen Risiko Pasar untuk mendukung proses pengelolaan Risiko Pasar. Pengukuran potensi risiko pasar untuk pengendalian internal BNI dilakukan secara harian menggunakan Model Internal - *Value at Risk (VaR) Methodology*, sedangkan pengukuran risiko pasar dalam rangka perhitungan Kewajiban Penyediaan Modal Minimum dilakukan secara bulanan menggunakan Metode Standar. BNI juga melakukan pengukuran risiko suku bunga pada *banking -(IRRBB)* secara triwulanan menggunakan Pendapatan bunga bersih (NII) dan pendekatan nilai ekonomis dari ekuitas (EVE) serta pengukuran Risiko Nilai Tukar pada *banking book* melalui perhitungan Posisi Devisa Neto (PDN) secara harian dan bulanan sesuai ketentuan Regulator (tidak diaudit).

Sehubungan dengan penggunaan Model Internal (VaR) dalam pengukuran Risiko Pasar, BNI telah melakukan proses validasi melalui *Back Testing* secara periodik untuk menilai akurasi pengukuran VaR yang digunakan. Selain itu, BNI telah melakukan proses *Stress Testing* terhadap instrumen keuangan yang terekspos risiko nilai tukar dan risiko suku bunga (portofolio obligasi) untuk menilai ketahanan Bank dalam menghadapi perubahan faktor pasar yang ekstrim pada saat kondisi pasar abnormal. *Stress Testing* dilakukan setiap 6 (enam) bulan sekali atau periode yang lebih pendek jika terjadi kondisi abnormal.

Limit Risiko Pasar BNI sebagai bagian dari proses pengendalian Risiko Pasar ditetapkan dan dikaji ulang secara periodik oleh Divisi ERM dan Divisi PGV yang independen terhadap *risk taking units* (Divisi TRS dan kantor cabang luar negeri). Limit-limit Risiko Pasar adalah sebagai berikut:

a. Limit Risiko Pasar pada *trading book*:
   (i) Limit *Value at Risk* (VaR) dan limit *Stressed Value at Risk* (SVaR)
   (ii) Limit nominal transaksi
   (iii) Limit nominal *open position*
   (iv) Limit *Budget Loss*
   (v) Limit *Early Warning Signal Forex*
   (vi) Limit *Early Warning Signal* Surat Berharga
   (vii) Limit *Off Market Price*
   (viii) Limit Kewajaran Kuotasi Jibor

b. Limit Risiko Pasar pada *banking book*:
   (i) Limit IRRBB (EVE dan NII)
   (ii) Limit Posisi Devisa Neto internal BNI.

***50. MARKET RISK** (continued)*

BNI has Market Risk Tools to support the implementation of the Market Risk Process. The measurement of potential market risk, for internal control purposes, is conducted on a daily basis using an Internal Model - Value at Risk (VaR) Methodology. On the other hand, the market risk measurement for Capital Adequacy Ratio purposes, is conducted on a monthly basis using the Standard Method. BNI also conducts on a quarterly basis the measurement of interest rate risk on banking book-(IRRBB) using net interest income perspective (NII) and economic value of equity perspective (EVE) and the measurement for foreign exchange risk on banking book by calculating the Net Open Position (NOP) both daily and monthly in accordance with the Regulator's regulation (unaudited).

In line with the use of the Internal Model (VaR) in measuring market risk, BNI conducts Back Testing periodically to assess the accuracy of the VaR methodologies used. Stress Testing has also been conducted for the financial instruments that are exposed to foreign exchange risk and interest rate risk (limited to bond positions) in order to assess the Bank's resilience in encountering extreme change of risk factors in abnormal market conditions. Stress Testing is done every 6 (six) months or in case there is an abnormal condition whichever is earlier.

BNI Market Risk limit as a part of the risk controlling process is set and reviewed periodically by ERM and PGV which are independent from risk taking units (TRS and overseas branches). The Market Risk limits are as follows:

a. Market Risk limits on trading book:
   (i) Value at Risk (VaR) limit and *Stressed Value at Risk* (*SVaR*) *limit*
   (ii) Transaction nominal limit
   (iii) Open position limit
   (iv) Budget Loss limit
   (v) Early Warning Signal Limit for Forex
   (vi) Early Warning Signal Limit for Securities
   (vii) Off Market Price Limit
   (viii) Fairness Limit for Jibor Quotations

b. Market Risk limits on banking book:
   (i) IRRBB Limit (EVE and NII)
   (ii) Internal BNI Net Open Position Limit.

50. RISIKO PASAR (lanjutan)

Divisi ERM juga menyusun *risk appetite* dan *risk tolerance* Risiko Pasar yang selaras dengan sasaran strategis Bank, yang digunakan sebagai acuan tingkat risiko yang akan diambil Bank dalam pencapaian sasaran bisnis.

Pemantauan Risiko Pasar dilakukan melalui laporan yang memberikan informasi mengenai eksposur risiko pasar dan kepatuhan terhadap limit-limit. Laporan VaR diberikan kepada manajemen BNI secara berkala (harian, mingguan dan bulanan) melalui laporan sirkulasi atau forum RMC. Khusus terkait dengan laporan perkembangan Risiko Suku Bunga pada *banking book* disampaikan kepada manajemen setiap bulan melalui forum *Asset & Liabilities Committee (ALCO)*.

BNI menggunakan model *Value at Risk* (VaR) untuk menghitung potensi risiko pasar yang timbul akibat perubahan faktor pasar yang dapat mempengaruhi nilai pasar pada portofolio produk Bank. Cakupan Risiko Pasar adalah sebagai berikut:

a. Risiko Nilai Tukar pada *trading book* dan *banking book.*
b. Risiko Suku Bunga pada *trading book* dan *banking book* (tidak termasuk aset-aset/investasi yang dimiliki hingga jatuh tempo).

Metode untuk menghitung VaR yang digunakan BNI adalah *Variance Covariance/Risk Metrics*. Metode ini menggunakan formula dengan memasukkan parameter-parameter seperti volatilitas dan korelasi. Metode ini mengasumsikan bahwa segala perubahan dalam faktor risiko yang mempengaruhi kondisi pasar normal akan mengikuti distribusi normal. Sedangkan untuk kondisi pasar harian yang tidak normal, dilakukan perhitungan *Stressed* VaR.

VaR tidak menyediakan informasi potensi laba atau rugi pada kondisi pasar yang ekstrim atau *stress*. BNI melakukan *stress testing* untuk kondisi pasar yang ekstrim tersebut.

Pengukuran VaR adalah estimasi maksimum potensi kerugian Risiko Pasar untuk 1 (satu) hari ke depan dengan tingkat keyakinan 99% dengan posisi portofolio yang dimiliki tidak berubah. Penggunaan tingkat keyakinan 99% berarti dalam rentang waktu satu hari, kerugian harian yang melebihi VaR dalam kondisi pasar normal tidak akan terjadi lebih dari 1 (satu) kali dalam 100 hari.

***50. MARKET RISK** (continued)*

ERM Division also prepares risk appetite and risk tolerance for Market Risk in accordance with the Bank's strategic objectives, which are used as a reference level of risk to be taken by the Bank in achieving business goals.

Market Risk monitoring is conducted through reports which give information about the market risk exposures and the limit compliance. The VaR reports are submitted to BNI management on a periodic basis (daily, weekly, and monthly) through circular reports or RMC forum. Specifically the report for interest rate risk on banking book is submitted to management on a monthly basis through the ALCO forum.

BNI uses Value at Risk model (VaR) to measure potential market risk arising from possible changes of market factors which can affect the market value of the Bank portfolio. The scope of Market Risk is as follows:

a. Foreign exchange risk on trading book and banking book.
b. Interest rate risk on trading book and banking book (excluding held-to-maturity assets/ investments).

The VaR method used in BNI is Variance Covariance/Risk Metrics. This method uses formulas with some parameters such as volatility and correlation. It assumes that any changes that occurs in the risk factors affecting the normal market conditions will follow normal distribution. For abnormal market condition, Stressed VaR calculation is applied.

VaR does not provide information for potential gain or loss in the extreme or stress market condition. BNI performs stress testing in the extreme market condition.

The VaR calculation is an estimate using a 99% confidence level of the potential loss that is not expected to be exceeded if the current market risk positions were to be held unchanged for one day. The use of a 99% confidence level means that, within a one day horizon, losses exceeding the VaR figure should occur, on average under normal market conditions, not more than once every one hundred days.

50. RISIKO PASAR (lanjutan)

Karena VaR adalah bagian dari pengelolaan Risiko Pasar Bank, limit-limit VaR telah dibentuk untuk seluruh *trading operation* dan eksposur perlu ditinjau oleh manajemen secara harian terhadap limit-limit.

Tabel dibawah ini menunjukkan VaR agregat pada portofolio *trading book* dan *banking book* milik Bank: (tidak diaudit)

***50. MARKET RISK** (continued)*

Since VaR is an integral part of the Bank's market risk management, VaR limits have been established for all trading operations and exposures are required to be reviewed daily against the limits by management.

The table below presents the aggregate VaR on the Bank's trading book and banking book portfolio: (unaudited)

	2024			
	Risiko mata uang asing/ *Foreign exchange risk*	**Risiko nilai wajar suku bunga/ *Fair value interest rate risk***		
		Trading book	***Banking book***	
2024 - 31 Desember	31,225	1,448	243,371	*2024 - 31 December*
2024 - Rata-rata harian	16,795	3,309	236,462	*2024 - Average daily*
2024 - Tertinggi	34,205	7,551	275,954	*2024 - Highest*
2024 - Terendah	1,740	1,396	186,284	*2024 - Lowest*

	2023			
	Risiko mata uang asing/ *Foreign exchange risk*	**Risiko nilai wajar suku bunga/ *Fair value interest rate risk***		
		Trading book	***Banking book***	
2023 - 31 Desember	13,732	2,892	251,871	*2023 - 31 December*
2023 - Rata-rata harian	12,495	4,008	268,548	*2023 - Average daily*
2023 - Tertinggi	23,217	9,249	316,015	*2023 - Highest*
2023 - Terendah	8,533	1,497	222,009	*2023 - Lowest*

(i) Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul pada instrumen keuangan yang mempunyai kemungkinan kerugian akibat perubahan tingkat suku bunga yang akan berdampak pada arus kas masa depan atau nilai wajar instrumen keuangan.

Komite Manajemen Risiko dan Anti Fraud Sub Komite Manajemen Risiko (KRA-RMC) BNI, bertanggung jawab untuk menetapkan, melaksanakan serta menjaga kebijakan pengelolaan risiko tingkat suku bunga sesuai dengan pedoman umum BNI. Tujuan utama Komite Manajemen Risiko dan Anti Fraud Sub Komite Manajemen Risiko (KRA-RMC) BNI adalah memaksimalkan hasil usaha BNI dengan tetap memperhatikan limit risiko yang ditetapkan.

(i) Interest rate risk

Interest rate risks arise from financial instruments which have the loss possibilities from changes in interest rates that will affect future cash flows or fair value of the financial instruments.

BNI's Risk Management and Anti Fraud Committee sub Committee Risk Management (KRA-RMC) held responsible for determining, executing and overseeing the interest rate risk management policy in accordance with the overall guidelines of BNI. The main objective of the Risk Management and Anti Fraud Committee sub Committee Risk Management (KRA-RMC) is to maximise BNI's returns within the predetermined risk limits.

50. RISIKO PASAR (lanjutan) / *MARKET RISK (continued)*

(i) Risiko tingkat suku bunga (lanjutan) / *(i) Interest rate risk (continued)*

Tabel di bawah ini merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas konsolidasian yang signifikan pada tanggal 31 Desember 2024 dan 2023:

The tables below summarise the range of contractual interest rates per annum for significant consolidated assets and liabilities as of 31 December 2024 and 2023:

2024

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	Dolar Australia/ *Australian Dollar* %	
ASET											***ASSETS***
Penempatan pada bank lain dan Bank Indonesia	0.00 - 7.00	2.00 - 5.17	-	-	-	3.10 - 3.20	3.85	-	-	-	*Placements with other banks and Bank Indonesia*
Efek-efek	5.35 - 11.25	2.30 - 6.00	-	-	-	-	-	-	-	-	*Marketable securities*
Tagihan Akseptasi	-	0.00 - 7.52	-	-	-	-	-	-	-	-	*Acceptance receivable*
Efek-efek yang dibeli dengan janji dijual kembali	6.45 - 6.80	4.37 - 4.57	-	-	-	-	-	-	-	-	*Securities Purchase under agrrement to resell*
Wesel ekspor dan tagihan lainnya	0.00 - 8.00	0.00 - 6.00	-	-	-	-	-	-	-	-	*Bills and other receivables*
Pinjaman yang diberikan	0.00 - 22.45	0.00 - 10.22	3.90 - 7.00	0.41 - 3.88	4.00 - 7.25	4.35 - 6.00	6.25	7.60 - 7.70	1.50 - 8.56	6.71 - 7.00	*Loans*
Obligasi Pemerintah											*Government Bonds*
- Tingkat bunga tetap	4.88- 12.00	0.50 - 7.75	0.90-1.75	0.57 - 3.00	0.50 - 1.25	-	-	-	-	-	*Fixed interest rate -*
- Tingkat bunga mengambang	6.29	-	-	-	-	-	-	-	-	-	*Floating interest rate -*
LIABILITAS											***LIABILITIES***
Simpanan nasabah	0.00 - 8.10	0.00 - 6.25	0.00 - 0.10	0.00 - 0.07	0.00 - 2.25	0.00 - 0.25	-	0.00 - 0.10	0.00 - 3.70	-	*Deposits from customers*
Simpanan dari bank lain	0.00 - 6.90	0.00 - 5.14	-	0.00 - 0.77	0.00 - 3.28	-	-	-	-	-	*Deposits from other banks*
Efek-efek yang dijual dengan janji dibeli kembali	5.50 - 8.38	1.85 - 4.75	-	-	-	-	-	-	-	-	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	6.35 - 6.85	5.28	-	-	-	-	-	-	-	-	*Securities issued*
Pinjaman yang diterima	7.18 - 9.50	4.52 - 6.00	3.07 - 3.18	-	3.86	3.60	-	-	-	*5.26*	*Borrowings*
Efek-efek subordinasi	-	3.75 - 4.30	-	-	-	-	-	-	-	-	*Subordinated securities*

2023

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	
ASET								***ASSETS***
Penempatan pada bank lain dan Bank Indonesia	0.00 - 7.25	0.00 - 5.75	-	-	-	3.10 - 3.55	-	*Placements with other banks and Bank Indonesia*
Efek-efek	5.35 - 11.25	2.30 - 7.16	-	-	-	-	-	*Marketable securities*
Tagihan Akseptasi	-	0.00 - 8.41	-	-	-	-	-	*Acceptance receivable*
Efek-efek yang dibeli dengan janji dijual kembali	6.00 - 6.70	5.33 - 5.35	-	-	-	-	-	*Securities Purchase under agrrement to resell*
Wesel ekspor dan tagihan lainnya	0.00 - 11.25	0.00 - 8.41	-	-	-	-	0.00	*Bills and other receivables*
Pinjaman yang diberikan	0.00 - 26.62	0.00 - 11.18	4.00 -7.20	0.50 - 3.51	4.00 - 7.25	4.00 - 5.47	6.00 - 6.00	*Loans*
Obligasi Pemerintah								*Government Bonds*
- Tingkat bunga tetap	3.88 -12.00	0.50 - 7.75	0.90 - 1.75	0.57 - 3.00	0.50 - 1.25	-	-	*Fixed interest rate -*
- Tingkat bunga mengambang	4.54	-	-	-	-	-	-	*Floating interest rate -*
LIABILITAS								***LIABILITIES***
Simpanan nasabah	0.00 - 7.50	0.00 - 6.90	0.00 - 0.10	0.00 - 0.01	0.00 - 1.75	-	-	*Deposits from customers*
Simpanan dari bank lain	0.00 - 6.70	0.00 - 6.05	-	0.00 - 0.45	0.00 - 4.20	-	-	*Deposits from other banks*
Efek-efek yang dijual dengan janji dibeli kembali	6.65	1.30 - 6.32	-	-	-	-	-	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	6.35 - 6.85	-	-	-	-	-	-	*Securities issued*
Pinjaman yang diterima	7.50 - 9.50	0.90 - 6.54	-	-	-	-	-	*Borrowings*
Efek-efek subordinasi	8.00	3.75 - 4.30	-	-	-	-	-	*Subordinated securities*

50. RISIKO PASAR (lanjutan)

(i) Risiko tingkat suku bunga (lanjutan)

Tabel berikut menunjukkan sensitivitas terhadap kemungkinan perubahan suku bunga dalam Rupiah yang wajar, dengan semua variabel lainnya tetap konstan, dalam laporan laba rugi Bank. Sensitivitas laporan laba rugi adalah dampak dari perubahan asumsi suku bunga pada laporan laba rugi pada periode tersebut. Sensitivitas total laba atau rugi didasarkan pada asumsi bahwa ada pergeseran paralel kurva hasil.

***50. MARKET RISK** (continued)*

***(i) Interest rate risk** (continued)*

The following tables demonstrate the sensitivity to a reasonable possible change in IDR interest rates, with all other variables held constant, in the Bank's profit or loss. The sensitivity of profit or loss is the effect of the changes in interest rates assumptions on the profit or loss for the period. The total sensitivity of profit or loss is based on the assumption that there are parallel shifts in the yield curve.

2024

Perubahan persentase/ *Percentage Change*	**Pengaruh terhadap laporan laba rugi/ *Impact to profit or loss***
±25 bps	±320,582
±50 bps	±641,164

2023

Perubahan persentase/ *Percentage Change*	**Pengaruh terhadap laporan laba rugi/ *Impact to profit or loss***
±25 bps	±401,363
±50 bps	±802,725

BNI memiliki eksposur terhadap risiko tingkat suku bunga dalam mata uang Dolar Singapura, Dolar Amerika Serikat, Euro dan lainnya. BNI telah melakukan penilaian atas dampak dari risiko tingkat suku bunga tersebut dan hasilnya tidak signifikan.

BNI has exposure to interest rate risks in Singapore Dollar, United States Dollar, Euro and others. BNI assessed that the impact of those interest rate risks is not significant.

(ii) Risiko mata uang

Risiko valuta asing timbul sebagai akibat adanya aset dan liabilitas keuangan dalam valuta asing dan rekening administratif konsolidasian baik pada sisi aset konsolidasian maupun liabilitas konsolidasian. Posisi valuta asing BNI dapat dikelompokkan dalam dua aktivitas yaitu: *trading book*, yang dilakukan dalam rangka memperoleh keuntungan transaksi valuta asing, dan *banking book*, yang dilakukan dalam rangka mengendalikan Posisi Devisa Neto BNI secara keseluruhan.

BNI memiliki kebijakan untuk menjaga eksposur mata uang asing dalam batas yang wajar dan berdasarkan peraturan yang berlaku. Manajemen berkeyakinan bahwa saat ini eksposur mata uang asing atas aset dan liabilitas masih dalam batas yang konservatif.

(ii) Currency risk

Foreign currency risks arise from the consolidated financial assets and liabilities and administrative accounts in foreign currency positions, both on the consolidated assets and liabilities. BNI's foreign currency position is divided into two activities: the trading book, which is prepared to generate profit from the exchange rate, and the banking book, which is prepared to control BNI's overall Net Open Position.

BNI's policy is to maintain foreign currency exposure within acceptable limits and within existing regulatory guidelines. The Management believes that its current profile of foreign currency exposure on its assets and liabilities is within conservative limits.

Informasi tambahan risiko pasar yang merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia diungkapkan pada Catatan 59m.

The following additional information market risk that is required by applicable regulations and is not required by Indonesian Accounting Standards is disclosed in Note 59m.

51. RISIKO OPERASIONAL

Informasi tambahan risiko operasional yang merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia diungkapkan pada Catatan 59n.

51. OPERATIONAL RISK

The following additional information operational risk that is required by applicable regulations and is not required by Indonesian Accounting Standards is disclosed in Note 59n.

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari semua aset dan liabilitas keuangan disajikan per kategori dari instrumen keuangan. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal-tanggal 31 Desember 2024 dan 2023, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

52. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

The table below summarises the comparison between the carrying amounts and fair values of all financial assets and liabilities presented per category of financial instruments. The fair values disclosed are based on relevant information available as of 31 December 2024 and 2023, and not updated to reflect changes in market conditions which have occurred after this date.

	2024		2023		
	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	
Aset keuangan					***Financial assets***
Kas	13,709,930	13,709,930	11,207,201	11,207,201	*Cash*
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Efek-efek	23,959,614	23,959,614	9,759,264	9,759,264	*Marketable securities*
Obligasi Pemerintah	3,957,073	3,957,073	4,187,772	4,187,772	*Government Bonds*
Tagihan derivatif	1,792,978	1,792,978	995,677	995,677	*Derivatives receivable*
	29,709,665	29,709,665	14,942,713	14,942,713	
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Obligasi Pemerintah	90,904,441	90,904,441	86,549,332	86,549,332	*Government Bonds*
Efek-efek	24,187,442	24,187,442	27,044,101	27,044,101	*Marketable securities*
Penyertaan saham	637,280	637,280	563,700	563,700	*Equity investments*
	115,729,163	115,729,163	114,157,133	114,157,133	
Biaya perolehan diamortisasi					***Amortised cost***
Pinjaman yang diberikan	737,187,258	737,187,258	647,926,638	647,926,638	*Loans*
Giro pada Bank Indonesia	51,669,054	51,669,054	65,256,432	65,256,432	*Current accounts with Bank Indonesia*
Obligasi Pemerintah	37,210,055	36,984,557	36,363,265	35,257,128	*Government Bonds*
Giro pada bank lain	22,074,173	22,074,173	35,022,762	35,022,762	*Current accounts with other banks*
Tagihan akseptasi	15,925,521	15,925,521	17,091,194	17,091,194	*Acceptance receivables*
Penempatan pada bank lain dan Bank Indonesia	17,075,441	17,075,441	43,794,166	43,794,166	*Placements with other banks and Bank Indonesia*
Wesel ekspor dan tagihan lainnya	13,243,026	13,243,026	18,998,994	18,998,994	*Bills and other receivables*
Aset lain-lain - bersih*)	9,533,153	9,533,153	11,701,003	11,701,003	*Other assets - net*)*
Efek-efek yang dibeli dengan janji dijual kembali	7,971,923	7,971,923	13,951,344	13,951,344	*Securities purchased under agreement to resell*
Efek-efek	387,017	387,290	361,374	364,361	*Marketable securities*
	912,276,621	912,051,396	890,467,172	889,364,022	
	1,071,425,379	**1,071,200,154**	**1,030,774,219**	**1,029,671,069**	

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

52. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

	2024		2023		
	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	
Liabilitas keuangan Nilai wajar melalui laporan laba rugi					***Financial liabilities Fair value through profit or loss***
Liabilitas derivatif	1,479,185	1,479,185	810,462	810,462	*Derivative payables*
Liabilitas keuangan lainnya					***Other financial liabilities***
Simpanan nasabah					*Deposits from customers*
Giro	305,733,528	305,733,528	345,496,168	345,496,168	*Current accounts*
Tabungan	257,544,353	257,544,353	231,981,435	231,981,435	*Savings account*
Deposito berjangka	242,232,967	242,232,967	232,664,980	232,664,980	*Time deposits*
Negotiable Certificate of Deposit	-	-	587,760	587,760	*Negotiable Certificate of Deposit*
Pinjaman yang diterima	42,931,444	42,931,444	30,949,608	30,949,608	*Borrowings*
Liabilitas lain-lain**)	19,641,982	19,641,982	18,512,179	18,512,179	*Other liabilities**)*
Efek-efek subordinasi	17,699,183	17,079,032	16,928,731	15,857,891	*Subordinated securities*
Simpanan dari bank lain					*Deposits from other banks*
Pinjaman pasar uang antar bank	12,294,527	12,294,527	5,117,755	5,117,755	*Inter-bank call money*
Giro	3,725,403	3,725,403	4,376,529	4,376,529	*Current accounts*
Deposito berjangka	831,067	831,067	804,114	804,114	*Time deposit*
Negotiable Certificate of Deposit	770,760	770,760	515,651	515,651	*Negotiable Certificate of Deposit*
Simpanan lainnya	926,707	926,707	1,079,939	1,079,939	*Other deposits*
Efek-efek yang dijual dengan janji dibeli kembali	15,890,945	15,890,945	6,891,177	6,891,177	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	12,974,497	13,167,926	4,893,357	4,998,160	*Securities issued*
Liabilitas segera	5,514,720	5,514,720	5,294,952	5,294,952	*Obligation due immediately*
Liabilitas akseptasi	4,229,484	4,229,484	5,748,547	5,748,547	*Acceptance payables*
	942,941,567	942,514,845	911,842,882	910,876,845	
	944,420,752	**943,994,030**	**912,653,344**	**911,687,307**	

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain dan piutang dari nasabah - Entitas anak.

**) Liabilitas lain-lain terdiri dari utang ke pemegang polis, setoran jaminan, rekening dalam penyelesaian, utang reasuransi dan komisi, serta utang nasabah - Entitas Anak.

*) *Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and receivables from customers - Subsidiary.*

**) *Other liabilities consist of obligation to policyholders, guarantee deposits, unsettled account, reinsurance payable and commission, and payable to customers - Subsidiary.*

Bank menggunakan hirarki berikut untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan:

(i) Tingkat 1: Harga dikutip (tidak disesuaikan) dari pasar yang aktif untuk aset atau liabilitas keuangan yang identik;
(ii) Tingkat 2: Input selain harga yang dikutip dari pasar yang disertakan pada Tingkat 1 yang dapat diobservasi untuk aset dan liabilitas keuangan, baik secara langsung (yaitu sebagai sebuah harga) atau secara tidak langsung (yaitu sebagai turunan dari harga);
(iii) Tingkat 3: Input untuk aset atau liabilitas keuangan yang tidak didasarkan pada data pasar yang dapat diobservasi (informasi yang tidak dapat diobservasi).

The Bank adopts the following hierarchy for determining and disclosing the fair value of financial instruments:

(i) Level 1: Quoted prices in active market for the same/identical financial asset or liability;

(ii) Level 2: Inputs other than quoted market prices included in Level 1 that are observable for the financial asset or liability, either directly (as a price) or indirectly (as derived from price);

(iii) Level 3: Inputs for the financial assets or liability that are not based on observable market data (unobservable information).

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

52. *FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)*

Tabel di bawah ini menunjukkan instrumen keuangan yang diukur pada nilai wajar yang dikelompokkan berdasarkan hirarki nilai wajar:

The table below shows the financial instruments measured at fair value grouped according to the fair value hierarchy:

2024

	Nilai tercatat/ *Carrying value*	Nilai wajar/*Fair value* Tingkat/ *Level 1*	Tingkat/ *Level 2*	Tingkat/ *Level 3*	
Aset keuangan					***Financial assets***
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Efek-efek	23,959,614	1,160,733	22,777,322	21,559	*Marketable securities*
Obligasi Pemerintah	3,957,073	3,957,073	-	-	*Government Bonds*
Tagihan derivatif	1,792,978	-	1,792,978	-	*Derivative receivables*
	29,709,665	5,117,806	24,570,300	21,559	
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Obligasi Pemerintah	90,904,441	66,807,204	24,097,237	-	*Government Bonds*
Efek-efek	24,187,442	19,281,464	4,905,978	-	*Marketable securities*
Penyertaan saham	637,280	-	-	637,280	*Equity investments*
	115,729,163	86,088,668	29,003,215	637,280	
	145,438,828	**90,045,742**	**53,573,515**	**658,839**	
Liabilitas keuangan					***Financial liabilities***
Nilai wajar melalui laporan laba rugi					***Fair value through profit or loss***
Liabilitas derivatif	1,479,185	-	1,479,185	-	*Derivatives payable*
	1,479,185	-	1,479,185	-	

2023

	Nilai tercatat/ *Carrying value*	Nilai wajar/*Fair value* Tingkat/ *Level 1*	Tingkat/ *Level 2*	Tingkat/ *Level 3*	
Aset keuangan					***Financial assets***
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Efek-efek	9,759,264	1,478,167	8,266,881	14,216	*Marketable securities*
Obligasi Pemerintah	4,187,772	4,187,772	-	-	*Government Bonds*
Tagihan derivatif	995,677	-	995,677	-	*Derivative receivables*
	14,942,713	5,665,939	9,262,558	14,216	
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Obligasi Pemerintah	86,549,332	79,039,214	7,510,118	-	*Government Bonds*
Efek-efek	27,044,101	20,352,097	6,692,004	-	*Marketable securities*
Penyertaan saham	563,700	-	-	563,700	*Equity investments*
	114,157,133	99,391,311	14,202,122	563,700	
	129,099,846	**105,057,250**	**23,464,680**	**577,916**	
Liabilitas keuangan					***Financial liabilities***
Nilai wajar melalui laporan laba rugi					***Fair value through profit or loss***
Liabilitas derivatif	810,462	-	810,462	-	*Derivatives payable*
	810,462	-	810,462	-	

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

52. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

Teknik penilaian dan input signifikan atas nilai wajar tingkat 3 untuk beberapa penyertaan saham pada tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

Valuation technique and significant input for fair value of level 3 for investments as 31 December 2024 and of 2023 are as follows:

Akun	Teknik Penilaian/ *Valuation Technique*	Input Signifikan/*Significant Input*	2024 %	2023 %	*Account*
Nilai wajar melalui laba rugi penghasilan komprehensif lain					***Fair value through comprehensive income***
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	Arus Kas yang Didiskontokan/ *Discounted cashflow*	Tingkat diskonto/*Discount rate*	16.05	17.32	*PT Penyelesaian Transaksi Elektronik Nasional (PTEN)*
		Tingkat bunga bebas risiko/*Risk-free rate*	6.89	6.97	
		Diskon Marketabilitas/*Discount for lack of Marketability (DLOM)*	36.00	32.00	
		Diskon Minoritas/*Discount for Lack of Control (DLOC)*	35.00	35.00	
PT Fintek Karya Nusantara	- Arus Kas yang Didiskontokan/ *Discounted cashflow* (90%) - Metode Pembanding Perusahaan Tercatat di Bursa Efek (GCM)/ *Guideline Publicly Traded Company Method* (10%)	Tingkat diskonto/*Discount rate*	19.33	12.65	*PT Fintek Karya Nusantara*
		Tingkat pertumbuhan perpetuitas/*Perpetuity Growth*	3.00	3.00	
		Diskon Marketabilitas/*Discount for lack of Marketability (DLOM)*	30.00	30.00	
		Diskon Minoritas/*Discount for Lack of Control (DLOC)*	30.00	30.00	
PT Fintek Karya Nusantara	- *Backsolve-Model* Opsi Harga/- *Backsolve-Option Pricing Model*	Tingkat votalita/*Votality rate*	-	-	*PT Fintek Karya Nusantara*
		Tingkat bunga bebas risiko/*Risk-free rate*	-	-	
		Periode keluar/ *Time to exit*	-	-	
		Diskon Marketabilitas/*Discount for lack of Matketability (DLOM)*	-	-	

Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hirarki nilai wajar.

Nilai wajar instrumen keuangan yang diperdagangkan dalam pasar aktif (contohnya surat berharga yang diukur dan tersedia untuk dijual), ditentukan dengan berdasarkan harga pasar yang dikutip pada tanggal pelaporan. Suatu pasar dianggap aktif apabila informasi mengenai harga kuotasian dapat diakses dengan mudah dan tersedia secara berkala dari suatu bursa, pedagang efek, broker, kelompok penilai harga pasar industri tertentu, regulator dan harga tersebut mencerminkan transaksi pasar yang aktual dan regular pada tingkat yang wajar. Harga pasar dikutip untuk aset keuangan yang dimiliki Grup adalah harga penawaran (*bid price*). Instrumen-instrumen tersebut digolongkan dalam Tingkat 1. Instrumen yang termasuk dalam Tingkat 1 umumnya meliputi investasi yang diklasifikasikan sebagai surat berharga yang diukur pada nilai wajar melalui laba rugi dan yang diukur pada nilai wajar melalui penghasilan komprehensif lain.

There is no transfer between level 1 and level 2 of the fair value hierarchy.

The fair value of financial instruments traded in an active market (i.e. measured and available-for-sale securities), is based on quoted market price at reporting date. A market is regarded as active if quoted prices are readily and regularly available from exchange, dealer or broker, industry group pricing service or regulatory agency, and those prices represent actual and regularly occurring market transaction on an arm's length basis. The quoted market price used for financial asset held by Group is bid price. These instruments are included in Level 1. Instruments included in Level 1 comprise primarily of securities classified as fair value through profit or loss and fair value through other comprehensive income.

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Nilai wajar instrumen keuangan yang tidak diperdagangkan di pasar aktif (contohnya derivatif *over-the-counter*) ditentukan dengan teknik penilaian. Teknik-teknik penilaian tersebut menggunakan data pasar yang dapat diobservasi dan sedapat mungkin meminimalisir penggunaan estimasi spesifik dari entitas. Apabila seluruh input yang dibutuhkan untuk menentukan nilai wajar instrumen keuangan dapat diobservasi, maka instrumen keuangan tersebut dikategorikan dalam Tingkat 2. Sebaliknya, jika salah satu atau lebih data tidak didasarkan pada data pasar yang dapat diobservasi, instrumen ini termasuk dalam Tingkat 3.

Teknik penilaian spesifik yang digunakan untuk melakukan penilaian pada instrumen keuangan, antara lain:

- Harga yang dikutip dari pasar atau pedagang efek instrumen serupa
- Nilai wajar dari *swap* tingkat suku bunga yang diperhitungkan sebagai nilai kini dari estimasi arus kas masa datang berdasarkan kurva imbal hasil yang dapat diobservasi
- Nilai wajar dari kontrak berjangka valuta asing yang ditentukan berdasarkan kurs berjangka pada tanggal pelaporan keuangan, dan
- Teknik-teknik lainnya, seperti analisis arus kas diskontoan yang digunakan untuk menentukan nilai wajar instrumen keuangan lainnya

(i) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada bank lain dan Bank Indonesia, efek-efek, wesel ekspor dan tagihan lainnya, efek-efek yang dibeli dengan janji dijual kembali, penyertaan saham, tagihan akseptasi dan aset lain-lain:

Penempatan pada bank lain dan Bank Indonesia merupakan penanaman dana dalam bentuk Bank Indonesia *Deposit Facility*, *Term Deposit, Deposit Facility Syariah*, *call money*, penempatan "*fixed-term*", deposito berjangka dan lain-lain.

Estimasi nilai wajar penyertaan saham ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasian yang serupa atau dinilai dengan menggunakan metode penilaian.

Nilai tercatat dari kas dan setara kas, serta penempatan dengan suku bunga mengambang adalah perkiraan yang layak atas nilai wajar.

52. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

The fair value of financial instruments that are not traded in an active market (i.e over-the-counter derivatives) is determined by using valuation techniques. These valuation techniques maximise the use of observable market data where it is available and rely as little as possible on entity's specific estimates. If all significant inputs required for the fair value of an instrument are observable, the instrument is included in Level 2. Otherwise, if one or more of the significant inputs is not based on observable market data, the instrument is included in Level 3.

Specific valuation techniques used to value financial instruments include:

- *Quoted market prices or dealer quotes for similar instruments*
- *Fair value of interest rate swap is calculated as the present value of estimated future cashflow based on observable yield curves*
- *Fair value of foreign exchange contracts is determined using forward exchange rates at reporting date, and*
- *Other techniques, such as discounted cash flow analysis, are used to determine fair value for other financial instruments*

(i) Current accounts with Bank Indonesia, current accounts with other banks, placements with other banks and Bank Indonesia, marketable securities, bills and other receivables, securities purchases under agreements to resell and other assets, equity investments, acceptance receivables and other assets:

Placements with other banks and Bank Indonesia represent placements in the form of Bank Indonesia Deposit Facility, *Term Deposit, Sharia Deposit Facility, call money, "fixed-term" placements, time deposits and others.*

The fair value for equity investment are based on the market prices or broker/dealer price quotations. When this information is not available, the fair value is estimated using quoted market prices for securities with similar characteristics or using valuation model.

The carrying amount of cash and cash equivalents, as well as placements with floating rates are a reasonable approximation of fair value.

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

(i) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada bank lain dan Bank Indonesia, efek-efek, wesel ekspor dan tagihan lainnya, efek-efek yang dibeli dengan janji dijual kembali, penyertaan saham, tagihan akseptasi dan aset lain-lain: (lanjutan)

Estimasi nilai wajar terhadap penempatan dengan suku bunga tetap, efek-efek, wesel ekspor dan tagihan lainnya, tagihan akseptasi dan aset lain-lain ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga pasar uang yang berlaku untuk utang dengan risiko kredit dan sisa jatuh tempo yang serupa. Karena sisa jatuh tempo di bawah satu tahun sehingga nilai tercatat dari penempatan dengan suku bunga tetap, wesel ekspor dan tagihan lainnya, efek-efek yang dibeli dengan janji untuk dijual kembali, tagihan akseptasi dan aset lain-lain adalah perkiraan yang layak atas nilai wajar.

(ii) Pinjaman yang diberikan

Portofolio kredit Bank secara umum terdiri dari pinjaman yang diberikan dengan suku bunga mengambang dan pinjaman yang diberikan jangka pendek dengan suku bunga tetap. Pinjaman yang diberikan dinyatakan berdasarkan *amortised cost*. Nilai wajar dari pinjaman yang diberikan menunjukkan nilai diskon dari perkiraan arus kas masa depan yang diharapkan akan diterima oleh Bank dengan menggunakan suku bunga pasar saat ini.

Nilai tercatat dari pinjaman yang diberikan dengan suku bunga mengambang dan nilai tercatat atas pinjaman jangka pendek dengan suku bunga tetap adalah perkiraan yang layak atas nilai wajar.

(iii) Liabilitas segera, simpanan nasabah dan simpanan dari bank lain, liabilitas akseptasi dan liabilitas lain-lain

Estimasi nilai wajar liabilitas segera, simpanan tanpa jatuh tempo, termasuk simpanan tanpa bunga adalah sebesar jumlah yang harus dibayarkan kembali sewaktu-waktu.

Estimasi nilai wajar terhadap simpanan dengan tingkat suku bunga tetap dan liabilitas akseptasi ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga utang baru dengan sisa jatuh tempo yang serupa. Karena sisa jatuh tempo dibawah satu tahun sehingga nilai tercatat dari simpanan dengan suku bunga tetap, liabilitas akseptasi dan liabilitas lain-lain adalah perkiraan yang layak atas nilai wajar.

52. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

(i) Current accounts with Bank Indonesia, current accounts with other banks, placements with other banks and Bank Indonesia, marketable securities, bills and other receivables, securities purchases under agreements to resell and other assets, equity investments, acceptance receivables and other assets: (continued)

The estimated fair values of fixed interest bearing placements, marketable securities, bills and other receivables, acceptance receivables and other assets were based on discounted cash flows using prevailing money market interest rates for debts with similar credit risk and remaining maturity. Since the maturity is less than one year, the carrying amounts of fixed rate placements, bills and other receivables, securities purchased under agreements to resell, acceptance receivables and other assets were a reasonable approximation of their fair value.

(ii) Loans

Generally, the Bank's portfolio consists of loans with floating interest rate and short-term loans with fixed interest rate. Loans are stated at amortised cost. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received by the Bank using the current market rates.

The carrying amount of floating rate loans and short-term fixed rate loans are the reasonable approximation of their fair values.

(iii) Obligations due immediately, deposits from customers and deposits from other banks, acceptance payables and other liabilities

The estimated fair value of obligations due immediately, deposits with no stated maturity, which include non-interest bearing deposits, are the amounts repayable on demand.

The estimated fair values of fixed interest-bearing deposits and acceptance payables are based on discounted cash flows using interest rates for new debts with similar remaining maturity. Since the maturity is below one year, the carrying amounts of fixed rate deposits, acceptance payables and other liabilities are the reasonable approximation of their fair values.

52. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

(iv) Efek-efek dan Obligasi Pemerintah

Nilai wajar untuk efek-efek dan Obligasi Pemerintah yang dimiliki hingga jatuh tempo ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa atau dinilai dengan menggunakan metode penilaian.

(v) Efek-efek yang diterbitkan, pinjaman yang diterima, dan efek-efek yang dijual dengan janji dibeli kembali dan efek-efek subordinasi.

Nilai wajar agregat berdasarkan model diskonto arus kas menggunakan kurva *yield* terkini yang tepat untuk sisa periode jatuh temponya.

***52. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES** (continued)*

(iv) Marketable securities and Government Bonds

The fair value for amortised cost marketable securities and Government Bonds are based on the market prices or broker/dealer price quotations. When this information is not available, the fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics or using internal valuation model.

(v) Securities issued, borrowings, securities sold under agreements to repurchase and subordinated securities.

Their aggregate fair values are based on discounted cash flow model using current yield curve appropriate for the remaining term to maturity.

53. MANAJEMEN MODAL

Tujuan manajemen permodalan Bank adalah untuk mempertahankan posisi modal yang kuat untuk mendukung pertumbuhan bisnis dan mempertahankan investor, deposan, pelanggan dan kepercayaan pasar. Dalam pengelolaan permodalan, Bank mempertimbangkan faktor-faktor seperti: pengembalian modal yang optimal pada pemegang saham, menjaga keseimbangan antara keuntungan yang lebih tinggi dengan *gearing ratio* serta keamanan yang diberikan oleh posisi modal yang sehat.

Informasi tambahan manajemen modal yang merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia diungkapkan pada Catatan 59o.

53. CAPITAL MANAGEMENT

The Bank's capital management objective is to maintain a strong capital position to support business growth and to maintain investor, depositor, customer and market confidence. In managing its capital, the Bank considers factors such as: providing optimal capital rate of return to shareholders, maintaining a balance between high return gearing ratio and safety provided by a sound capital position.

The following additional information capital management that is required by applicable regulations and is not required by Indonesian Accounting Standards is disclosed in Note 59o.

54. AKTIVITAS JASA LAINNYA

BNI menyediakan jasa kustodi, *trustee,* pengelolaan investasi dan reksadana kepada pihak-pihak ketiga. Aset yang terdapat dalam aktivitas jasa lainnya tidak termasuk dalam laporan keuangan konsolidasian ini. Jumlah komisi yang diterima dari pemberian jasa ini adalah masing-masing sebesar Rp82.345 dan Rp94.343 untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2024 dan 2023.

54. OTHER ACTIVITIES

BNI provides custodian, trustee, investment management and mutual fund services to third parties. Assets that are held in other activities are not included in these consolidated financial statements. Total fees received from these services amounted to Rp82,345 and Rp94,343 for the year ended 31 December 2024 and 2023, respectively.

54. AKTIVITAS JASA LAINNYA (lanjutan)

Kegiatan Jasa Kustodian

Jasa Kustodian BNI mendapat izin operasi oleh Bapepam dan LK berdasarkan Surat Keputusan No. KEP-162/PM/1991 tertanggal 9 Desember 1991. Kustodian BNI merupakan bagian dari Divisi Operasional, dimana jasa-jasa yang ditawarkan adalah sebagai berikut:

a. Penyimpanan (*safekeeping*) dan administrasi (*administration*) atas efek-efek maupun dokumen berharga lainnya;
b. Penyelesaian transaksi (*settlement*) jual dan beli efek berbentuk warkat (*script*) maupun tanpa warkat (*scriptless*);
c. Pengurusan hak-hak nasabah atas kepemilikan efek-efek yang disimpan sehingga hak tersebut efektif di rekening nasabah *(corporate action)*;
d. Perwalian *(proxy)* pada Rapat Umum Pemegang Saham dan Rapat Umum Pemegang Obligasi;
e. Penyampaian laporan *(reporting)* dan informasi *(information)* yang terkait dengan efek-efek dan/atau dokumen berharga milik nasabah yang disimpan dan diadministrasikan oleh Kustodian BNI.

Untuk memenuhi kebutuhan investor dalam melakukan investasi pada berbagai instrumen efek-efek, Kustodian BNI memfasilitasinya dengan menyediakan beragam layanan:

a. Kustodian umum untuk melayani investor yang melakukan investasi pada instrumen pasar modal dan pasar uang di Indonesia;

b. *Sub-Registry* untuk melayani investor yang melakukan transaksi dan investasi pada Surat Utang Negara (SUN - Obligasi Pemerintah atau Surat Perbendaharaan Negara) serta Sertifikat Bank Indonesia (SBI);

c. Kustodian reksadana (*mutual fund*) dan kontrak pengelolaan dana (*discretionary fund*) yang diterbitkan dan dikelola oleh manajer investasi;

d. Kustodian *Euroclear* bagi nasabah yang akan melakukan investasi dan penyelesaian transaksi efek-efek yang tercatat di *Euroclear Operations Centre,* Brussels. Kustodian BNI merupakan anggota langsung dari *Euroclear.*

Pada tanggal-tanggal 31 Desember 2024 dan 2023, Kustodian BNI memiliki 173 nasabah dan 189 nasabah (tidak diaudit). Nasabah utama terdiri dari dana pensiun, perusahaan asuransi, bank, yayasan, perusahaan sekuritas, reksadana, institusi/ badan hukum lain dan perseorangan. Nilai portofolio yang disimpan pada tanggal 31 Desember 2024 dan 2023 adalah masing-masing sebesar Rp276.777.612 dan Rp261.346.086 (tidak diaudit).

54. OTHER ACTIVITIES *(continued)*

Custodian Services

BNI Custodian Services has obtained an operating license based on the Decision Letter of Bapepam and LK No. KEP-162/PM/1991 dated 9 December 1991. BNI's Custodian Department, which is part of the Operational Division, provides a full range of custodian services such as:

a. Safekeeping and administration of marketable securities and other valuable assets;

b. Settlement and handling services for script and scriptless trading transactions;

c. Corporate action services related to the rights of the marketable securities;

d. Proxy services for its customers' shareholder meetings and bond holder meetings;

e. Generate reports and information regarding customers' marketable securities which are kept and administered by BNI's custodian department.

In order to fulfill the investors' needs in investing in various marketable securities and instruments, BNI's Custodian Operations facilitates various services as follows:

a. General custodian which provides services to investors investing in capital markets or money markets in Indonesia;

b. Sub-Registry service provider for settlement of Government Debenture Debt (SUN - either Government Bonds or Surat Perbendaharaan Negara) and SBI transactions;

c. Custodian for mutual funds and discretionary funds issued and managed by investment manager;

d. Euroclear Custodian for customer who is conducting investment and settlement of securities transactions listed in Euroclear Operations Center, Brussels. BNI Custodian is a direct member of Euroclear.

As of 31 December 2024 and 2023. BNI's custodians operations has 173 customers and 189 customers (unaudited), respectively. The customers are primarily pension funds, insurance companies, banks, foundations, securities companies,mutual funds, other institution/ legal entities and individual customers with total portfolio value as of 31 December 2024 and 2023 amounted to Rp276,777,612 and Rp261,346,086, respectively (unaudited).

54. AKTIVITAS JASA LAINNYA (lanjutan)

Kegiatan Jasa Kustodian (lanjutan)

BNI mengasuransikan portofolio nasabah yang disimpan di Kustodian terhadap kemungkinan kerugian yang timbul dari penyimpanan dan pemindahan efek-efek sesuai dengan ketentuan OJK, dahulu Bapepam dan LK.

Kegiatan Wali Amanat

BNI mendapat izin operasi untuk kegiatan wali amanat berdasarkan Surat Keputusan Badan Pengawas Pasar Modal dan Lembaga Keuangan No. 01/STTD-WA/PM/1996 tertanggal 27 Maret 1996. Jasa-jasa yang ditawarkan oleh wali amanat adalah sebagai berikut:

a. Jasa Wali Amanat untuk obligasi dan *medium-term notes* (MTN)
b. Jasa Agen Pengelola Rekening Penampungan
c. Jasa Agen Pembayaran
d. Jasa Penampungan Dana IPO
e. Jasa Agen Penjaminan

BNI selaku Wali Amanat, telah mengelola 117 emisi dengan nilai emisi (obligasi dan MTN) sebesar Rp25.814.067 pada tanggal 31 Desember 2024 dan 63 emisi dengan nilai emisi (obligasi dan MTN) sebesar Rp31.051.866 pada tanggal 31 Desember 2023 (tidak diaudit).

54. OTHER ACTIVITIES *(continued)*

Custodian Services *(continued)*

BNI carries insurance on custodian services against potential losses from safekeeping and transit of securities in accordance with OJK, previously Bapepam and LK regulation.

Trust Operations

BNI has obtained the operating license for trustee services based on Decision Letter of Capital Market and Financial Institutions Supervisory Agency No. 01/STTD-WA/PM/1996 dated 27 March 1996. The Trustee Services Business (TSB) provides a full range of the following services:

a. Trustee for bond and medium-term notes (MTN)
b. Escrow Account Agent
c. Paying Agent
d. Initial Public Offering / IPO Receiving Bank
e. Security Agent

BNI as a Trustee, has 117 bonds and MTN issued amounting to Rp25,814,067 as of 31 December 2024 and 63 bonds and MTN issued amounting to Rp31,051,866 as of 31 December 2023 (unaudited).

55. KREDIT KELOLAAN

BNI mengelola dana yang langsung dikeluarkan oleh Pemerintah Republik Indonesia (didanai oleh kreditur luar negeri) yang ditujukan kepada penerima pinjaman untuk keperluan pembiayaan proyek tertentu. Penerima pinjaman ini telah disetujui oleh Pemerintah Republik Indonesia. Pembayaran yang diterima oleh BNI dari penerima pinjaman dikembalikan lagi ke Pemerintah. BNI tidak menanggung risiko kredit atas transaksi-transaksi tersebut. Pinjaman tersebut bukan merupakan aset BNI dan dana yang diterima dari Pemerintah Republik Indonesia bukan merupakan liabilitas BNI. Pinjaman tersebut tidak dibukukan dalam laporan keuangan konsolidasian BNI. BNI memperoleh pendapatan atas pengelolaan pinjaman tersebut sebesar 0,25% dari rata-rata saldo baki debet pinjaman dalam mata uang Rupiah dan 0,15% dari rata-rata saldo baki debet pinjaman dalam mata uang Dolar Amerika Serikat.

55. CHANNELLING LOANS

BNI administers loans directly disbursed by the Government of the Republic of Indonesia (financed by overseas creditors) to the borrowers of certain specified projects. These borrowers are approved by the Government of the Republic of Indonesia. Payments received by BNI from borrowers are remitted back to the Government. BNI bears no credit risk on these transactions. These loans are not the assets of BNI and funds received from the Government of Republic of Indonesia are not the liabilities of BNI. These loans are not recognised in BNI's consolidated financial statements. BNI receives fees for administering the loans of 0.25% from the average of loans outstanding balance in Rupiah and 0.15% of the average of loan outstanding balance in United States Dollar.

55. KREDIT KELOLAAN (lanjutan)

Jumlah kredit yang dikelola oleh BNI atas nama Pemerintah tersebut pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

55. CHANNELLING LOANS (continued)

Following is the outstanding loans balance administered by BNI on behalf of the Government as of 31 December 2024 and 2023:

	2024	2023	
Sektor			***Sector***
Listrik, gas dan air	4,098	4,098	*Electricity, gas and water*
Pertanian	2,876	2,876	*Agriculture*
Pengangkutan, pergudangan dan komunikasi	2,747	2,747	*Transportation, warehouse and communications*
Perdagangan, restoran dan hotel	2,258	2,259	*Trading, restaurant and hotel*
Jasa pelayanan sosial	1,876	1,876	*Social services*
Jasa dunia usaha	1,680	1,680	*Business services*
Perindustrian	1,125	1,125	*Manufacturing*
Konstruksi	6	6	*Construction*
Lain-lain	9,399	9,402	*Others*
Total	**26,065**	**26,069**	***Total***

56. TAMBAHAN INFORMASI ARUS KAS

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas konsolidasian adalah sebagai berikut:

56. SUPPLEMENTARY CASH FLOW INFORMATION

Changes in liabilities arising from financing activities in the consolidated cash flow statement are as follows:

	1 Januari/ *January* 2024	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember/ *December* 2024	
Pinjaman yang diterima	30,949,608	12,424,936	(443,100)	42,931,444	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	6,891,177	8,430,894	568,874	15,890,945	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	4,893,357	8,187,500	(106,360)	12,974,497	*Securities issued*
Efek-efek subordinasi	16,928,731	-	770,453	17,699,184	*Subordinated securities*
Saham treasuri	(179,960)	-	179,960	-	*Treasury Shares*
Pembayaran Dividen	-	(10,454,738)	10,454,738	-	*Payment of dividends*
Pembayaran liabilitas sewa	1,287,369	(870,149)	586,993	1,004,213	*Payment of lease liabilities*
	60,770,282	**17,718,443**	**12,011,558**	**90,500,283**	

	1 Januari/ *January* 2023	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember/ *December* 2023	
Pinjaman yang diterima	35,654,206	(3,661,311)	(1,043,287)	30,949,608	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	2,885,286	4,011,546	(5,655)	6,891,177	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	4,896,875	-	(3,518)	4,893,357	*Securities issued*
Efek-efek subordinasi	17,213,150	-	(284,419)	16,928,731	*Subordinated securities*
Saham treasuri	-	(179,960)	-	(179,960)	*Treasury Shares*
Pembayaran dividen	-	(7,324,821)	7,324,821	-	*Payment of dividend*
Pembayaran liabilitas sewa	1,146,127	(240,769)	382,011	1,287,369	*Payment of lease liabilities*
	61,795,644	**(7,395,315)**	**6,369,953**	**60,770,282**	

57. ANALISIS KUALITAS KREDIT

Pengukuran Kerugian Kredit Ekspektasian

Peningkatan Risiko Kredit Secara Signifikan

Ketika menentukan apakah risiko gagal bayar pada instrumen keuangan telah meningkat secara signifikan sejak pengakuan awal, Bank mempertimbangkan informasi yang wajar dan terdukung, serta relevan yang tersedia tanpa biaya atau upaya yang berlebihan. Hal tersebut mencakup informasi dan analisa kuantitatif dan kualitatif, berdasarkan pada pengalaman historis dan penilaian pakar kredit dan termasuk perkiraan masa depan (*forward-looking*).

Tujuan dari penilaian ini adalah untuk mengidentifikasi apakah peningkatan risiko kredit secara signifikan atas eksposur telah terjadi dengan membandingkan:

- *Probability of default* (PD) atas umur tersisa pada tanggal pelaporan; dengan
- *Probability of default* (PD) atas umur tersisa yang diestimasi pada saat pengakuan awal eksposur (jika relevan, disesuaikan dengan perubahan ekspektasi pembayaran di muka).

Bank menggunakan kriteria berikut dalam menentukan apakah peningkatan risiko kredit secara signifikan atas eksposur telah terjadi:

- pengujian kuantitatif berdasarkan perubahan *probability of default* (PD);
- indikator kualitatif;
- tertunggak lebih dari 30 hari.

Credit Risk Grades

Bank mengalokasikan setiap eksposur ke *credit risk grades* berdasarkan variasi data yang ditentukan dapat memprediksi risiko gagal bayar dan menerapkan pengalaman atas kredit. *Credit risk grades* ditetapkan menggunakan faktor kualitatif dan kuantitatif yang dapat mengindikasikan risiko gagal bayar. Faktor-faktor ini bervariasi tergantung pada sifat eksposur dan jenis peminjam.

Credit risk grades ditetapkan dan dikalibrasi sedemikian rupa sehingga risiko terjadinya gagal bayar meningkat secara eksponensial seiring dengan penurunan *rating* risiko kredit, sebagai contoh, selisih antara *credit risk rating grades* 1 dan 2 lebih kecil dari pada selisih antara *credit risk rating grades* 2 dan 3.

Setiap eksposur dialokasikan ke *credit risk grades* pada pengakuan awal berdasarkan informasi yang tersedia tentang peminjam. Eksposur ini dipantau secara berkelanjutan, dan dapat mengakibatkan eksposur dipindahkan ke *credit risk grades* yang berbeda. Pemantauan biasanya menggunakan data berikut: laporan keuangan, penggunaan fasilitas kredit, dan estimasi kondisi ekonomi.

57. CREDIT QUALITY ANALYSIS

Measurement of Expected Credit Losses

Significant Increase in Credit Risk

When determining whether the risk of default on financial instruments has increased significantly since initial recognition, the Bank considers reasonable and supported relevant information that is available without excessive costs or efforts. This includes quantitative and qualitative information and analysis, based on historical experience and credit expert assessments and including forward-looking estimates.

The purpose of this assessment is to identify whether a significant increase in credit risk of exposure has occurred by comparing:

- *Probability of default (PD) for the remaining age at the reporting date; with*
- *Probability of default (PD) for the estimated remaining age at initial recognition of the exposure (if relevant, adjusted for change in expectations of prepayment).*

Bank use these criteria for determining whether there has been a significant increase in credit :

- *quantitative test based on movement in probability of default (PD);*
- *qualitative indicators;*
- *a backstop of 30 days past due.*

Credit Risk Grades

The Bank allocated each exposure to credit risk grades based on a variety of data that is determined to predict the risk of default and apply credit experience judgement. Credit risk grades are determined using qualitative and quantitative factors that can indicate the risk of default. These factors vary depending on the nature of the exposure and the type of borrower.

Credit risk grades are determined and calibrated in such a way that the risk of default is increasing exponentially as credit risk rating decreases, for example, the difference between credit risk rating grades 1 and 2 is smaller than the difference between credit risk rating grades 2 and 3.

Each exposure is allocated to credit risk grades at initial recognition based on available information about the borrower. This exposure is monitored on an ongoing basis, and can result in the exposure being transferred to different credit risk grades. Monitoring usually uses the following data: financial statements, use of credit facilities and estimates of economic conditions.

57. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Penentuan Struktur *Probability of Default*

Credit risk grades adalah input utama dalam penentuan struktur PD *term structure* atas eksposur. Bank mengumpulkan informasi kinerja dan gagal bayar tentang eksposur risiko kredit yang dianalisa berdasarkan yurisdiksi atau wilayah dan menurut jenis produk dan peminjam serta penilaian risiko kredit. Untuk beberapa portofolio, informasi yang dibeli dari penilai kredit eksternal juga digunakan.

Bank menggunakan model statistik untuk menganalisa data yang dikumpulkan dan menghasilkan perkiraan *probability of default* (PD) atas umur tersisa dan bagaimana hal ini diperkirakan akan berubah sebagai akibat dari berlalunya waktu.

Analisa ini mencakup identifikasi dan kalibrasi hubungan antara perubahan tingkat gagal bayar dan perubahan dalam faktor-faktor makro ekonomi utama serta analisa mendalam tentang dampak faktor-faktor lain tertentu (misalkan restrukturisasi) pada risiko gagal bayar. Untuk sebagian besar eksposur, indikator makro ekonomi utama meliputi: pertumbuhan PDB, suku bunga acuan, dan tingkat pengangguran. Untuk eksposur pada industri dan/atau wilayah tertentu, analisa dapat mencakup harga komoditas dan/atau harga properti yang relevan.

Penentuan Terjadinya Peningkatan Risiko Kredit Secara Signifikan

Bank mempergunakan sejumlah kriteria untuk menentukan telah terjadi peningkatan risiko kredit secara signifikan.

Kriteria tersebut ditetapkan menggunakan faktor kuantitatif dan kualitatif termasuk penentuan berdasarkan status hari tunggakan yang dapat mengindikasikan telah terjadi peningkatan risiko kredit yang signifikan terhadap saat awal diberikan.

Bank dimungkinkan menggunakan penilaian dari analis kredit dan jika memungkinkan, pengalaman historis yang relevan, dalam menentukan bahwa eksposur mungkin saja telah mengalami peningkatan risiko kredit yang signifikan berdasarkan indikator kualitatif tertentu yang dianggap dapat mengindikasikan hal tersebut dimana pengaruhnya mungkin belum sepenuhnya tercermin pada saat dilakukan analisis kuantitatif secara komprehensif dan tepat waktu.

***57. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

Determination of the Probability of Default Structure

Credit risk grades are the main input in determining the PD term structure of the exposure. The Bank collects performance and default information about credit risk exposures, which are analyzed by jurisdiction or region and by product and borrower type as well as credit risk assessment. For some portfolios, information purchased from external credit analyst is also used.

The Bank uses a statistical model to analyze the collected data and produce an estimate of the probability of default (PD) for the remaining life and how this is expected to change as a result of the passage of time.

This analysis includes the identification and calibration of the relationship between changes in default rates and changes in key macroeconomic factors as well as an in-depth analysis of the impact of other certain factors (e.g. restructuring) on the risk of default. For most exposures, the main macroeconomic indicators include: GDP growth, benchmark interest rates, and the unemployment rate. For exposures in certain industries and/or regions, the analysis can include commodity prices and/or relevant property prices.

Determination of Significant Increase in Credit Risk

Bank uses several criteria for determining that credit risk has increased significantly.

The criteria are determined using qualitative and quantitative factors including determination based on arrear day status that can indicate significant increase in credit risk since initial recognition.

The Bank can also use the judgment of credit analysts and, if possible, relevant historical experience, in determining that the exposure may have experienced a significant increase in credit risk based on certain qualitative indicators that are considered to indicate this and their effects may not be fully reflected in quantitative analysis in a comprehensive manner on a timely manner.

57. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Penentuan Terjadinya Peningkatan Risiko Kredit Secara Signifikan (lanjutan)

Bank menentukan bahwa peningkatan risiko kredit secara signifikan belum terjadi apabila masih kurang dari 30 hari tunggakan. Hari tunggakan ditentukan dengan menghitung jumlah hari sejak tanggal jatuh tempo awal dimana pembayaran penuh belum diterima. Tanggal jatuh tempo ditentukan tanpa mempertimbangkan masa tenggang yang mungkin tersedia bagi peminjam.

Bank memantau efektivitas kriteria yang digunakan dalam mengidentifikasi peningkatan risiko kredit yang signifikan dengan cara reviu berkala.

Modifikasi Aset Keuangan

Ketentuan kontraktual pinjaman dapat dimodifikasi untuk beberapa alasan, termasuk perubahan kondisi pasar, retensi pelanggan dan faktor-faktor lain yang tidak terkait dengan penurunan kredit saat ini. Pinjaman yang ketentuan kontraktualnya dimodifikasi dapat menyebabkan pinjaman awal dihentikan pengakuannya dan pinjaman hasil modifikasi diakui sebagai pinjaman baru pada nilai wajar.

Ketika ketentuan kontraktual pinjaman dimodifikasi dan tidak mengakibatkan penghentian pengakuan, penentuan terjadinya peningkatan risiko kredit secara signifikan dilakukan dengan cara membandingkan:
- Sisa PD sepanjang umur pada tanggal pelaporan berdasarkan ketentuan yang dimodifikasi; dengan
- Sisa PD sepanjang umur yang diestimasi berdasarkan data pada saat pengakuan awal dan ketentuan kontraktual awal.

Definisi Gagal Bayar *(Default)*

Grup menganggap aset keuangan dalam keadaan *default*/gagal bayar ketika:
- Debitur tidak mungkin membayar kewajiban kreditnya kepada secara penuh, tanpa bantuan (*recourse*) dari Grup; atau
- Debitur telah melewati jatuh tempo lebih dari 90 hari atas kewajiban kredit material apapun kepada Grup.

***57. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

***Determination of Significant Increase in Credit Risk** (continued)*

The Bank determines that a significant increase in credit risk has not occurred if it is still less than 30 days in arrears. Arrear days are determined by counting the number of days from the initial due date where full payment has not been received. The due date is determined without considering the grace period that might be available to the borrower.

The Bank monitors the effectiveness of the criteria used in identifying significant increases in credit risk by periodic review.

Modification of Financial Assets

Loan contractual terms can be modified for a number of reasons, including changes in market conditions, customer retention and other factors not related to the current credit decline. Loans with modified contractual terms can cause the initial loan to be derecognized and recognized the modified loan as a new loan at fair value.

When the contractual terms of the loan are modified and do not result in termination of recognition, determining the occurrence of a significant increase in credit risk is done by comparing:
- *PD remaining life at reporting date based on modified provision; with*
- *Residual PD throughout the estimated age based on data at initial recognition and initial contractual provisions.*

Definition of Failed Payment (Default)

The Group considers financial assets as default when:
- *The debtor is unlikely to pay its credit obligation in full, without assistance (recourse) from the Group; or*
- *The debtors have past due more than 90 days for any material credit obligations to the Group.*

57. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Definisi Gagal Bayar *(Default)* (lanjutan)

Dalam menilai apakah debitur dalam keadaan *default*/gagal bayar, Grup mempertimbangkan indikator berikut:
- Kualitatif seperti pelanggaran persyaratan perjanjian (*covenants*);
- Kuantitatif seperti status tunggakan; dan
- Berdasarkan data yang dikembangkan secara internal dan diperoleh dari sumber eksternal.

Input, Asumsi, dan Teknik yang Digunakan dalam Mengestimasi Penurunan Nilai

Penggunaan informasi perkiraan masa depan *(forward-looking)*

Grup menggunakan informasi *forward-looking* dalam menilai apakah telah terjadinya peningkatan risiko kredit secara signifikan dan pengukuran kerugian kredit ekspektasian. Berdasarkan saran dari Komite Manajemen Risiko, pakar ekonomi dan pertimbangan berbagai informasi aktual dan perkiraan eksternal, Grup merumuskan pandangan dasar (*base case*) tentang pergerakan variabel ekonomi yang relevan di masa depan serta perkiraan skenario lain yang mungkin terjadi. Proses ini meliputi pengembangan dua atau lebih skenario ekonomi tambahan dan mempertimbangkan probabilitas relatif dari keluaran (*output*) yang mungkin. Informasi eksternal mencakup data ekonomi dan perkiraan yang diterbitkan oleh, seperti badan pemerintah dan analis sektor swasta dan akademisi terpilih.

Pandangan dasar (*base case*) mencerminkan keluaran dengan probabilitas yang paling tinggi dan digunakan dalam perencanaan strategis dan anggaran. Skenario yang lain, mencerminkan keluaran yang lebih optimis dan keluaran yang lebih pesimis.

Pengukuran Kerugian Kredit Ekspektasian

Input utama dalam pengukuran kerugian kredit ekspektasian adalah variabel berikut :
- *Probability of default* (PD);
- *Loss of given default* (LGD);
- *Exposure at default* (EAD).

***57. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

***Definition of Failed Payment (Default)** (continued)*

In assessing whether a debtor is in default, the Group considers the following indicators:

- *Qualitative such as violations of the terms of the agreement (covenants);*
- *Quantitative such as arrears status; and*
- *Based on data developed internally and obtained from external sources.*

Inputs, Assumptions, and Techniques Used in Estimating Impairment

Use of forward-looking information

The Group uses forward-looking information in assessing whether there has been a significant increase in credit risk and measurement of expected credit losses. Based on advice from the Risk Management Committee, economists and consideration of various actual information and external forecast, the Group formulated a base case for the movement of relevant economic variables in future as well as forecasts of other possible scenarios. This process involves developing two or more additional economic scenarios and considering the relative probabilities of the possible outputs. External information includes economic data and estimation published by, such as government agencies and selected private sector analysts and academics.

The base case reflects the output with the highest probability and is used in strategic planning and budgeting. Another scenario, reflects more optimistic outputs and more pessimistic outputs.

Measurement of Expected Credit Loss

The main inputs in measuring expected credit loss are the following variables:
- *Probability of default (PD);*
- *Loss of given default (LGD);*
- *Exposure at default (EAD).*

57. ANALISIS KUALITAS KREDIT (lanjutan)

Input, Asumsi, dan Teknik yang Digunakan dalam Mengestimasi Penurunan Nilai (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Parameter ini umumnya berasal dari model statistik yang dikembangkan secara internal dan data historis lainnya. Parameter ini disesuaikan untuk mencerminkan informasi *forward-looking*.

Estimasi PD adalah estimasi pada tanggal tertentu, yang dihitung berdasarkan model peringkat statistik, dan dinilai menggunakan *rating* yang disesuaikan dengan berbagai kategori dari debitur dan eksposur. Model statistik ini didasarkan pada data yang disusun secara internal yang terdiri dari faktor kuantitatif dan kualitatif.

LGD adalah besarnya kerugian jika terjadi gagal bayar. Parameter LGD diestimasi secara historis berdasarkan tingkat pemulihan atas klaim terhadap debitur yang gagal bayar. Model LGD mempertimbangkan struktur, jaminan, senioritas klaim, industri debitur, dan biaya pemulihan setiap jaminan yang merupakan bagian integral dari aset keuangan.

EAD merepresentasikan estimasi eksposur jika terjadi gagal bayar. EAD suatu aset keuangan adalah jumlah tercatat bruto. Untuk komitmen pinjaman dan jaminan keuangan, EAD mencakup jumlah yang telah ditarik, serta jumlah potensial di masa depan yang akan ditarik, yang diestimasi berdasarkan pengamatan historis dan perkiraan berwawasan ke depan (*forward-looking*).

Ketika pemodelan parameter dilakukan secara kolektif, instrumen keuangan dikelompokkan berdasarkan kesamaan karakteristik risiko yang meliputi:
- jenis instrumen;
- peringkat risiko kredit;
- jenis agunan;
- tanggal pengakuan awal;
- sisa waktu jatuh tempo;
- industri; dan
- lokasi geografis debitur.

***57. CREDIT QUALITY ANALYSIS** (continued)*

***Inputs, Assumptions, and Techniques Used in Estimating Impairment** (continued)*

***Measurement of Expected Credit Loss** (continued)*

These parameters generally come from statistical models that are developed internally and other historical data. This parameter is adjusted to reflect forward-looking information.

PD estimation is an estimate on a certain date, which is calculated based on a statistical ranking model, and is assessed using a rating that is adjusted to various categories of debtors and exposures. This statistical model is based on data compiled internally consisting of quantitative and qualitative factors.

LGD is the amount of loss if there is a default. LGD parameters are historically estimated based on the level of recovery of claims against debtors who default. The LGD model considers the structure, collateral, claim seniority, the debtor industry, and the cost of recovering any collateral that is an integral part of a financial asset.

EAD represents the estimated exposure in case of default. EAD of a financial asset is the gross carrying amount. For loan commitments and financial guarantees, EAD includes the amount that has been withdrawn, as well as potential future amounts to be withdrawn, which are estimated based on historical observations and forward-looking estimates.

When parameter modelling is done collectively, financial instruments are grouped according to the similarity of risk characteristics which include:

- *type of instrument;*
- *credit risk rating;*
- *type of collateral;*
- *date of initial recognition;*
- *remaining due date;*
- *industry; and*
- *debtor's geographical location.*

58. BEBAN TANGGUNG JAWAB SOSIAL DAN LINGKUNGAN (TJSL)

Beban TJSL yang telah dibebankan pada laporan laba rugi untuk periode yang berakhir pada tanggal 31 Desember 2024 dan 2023 adalah masing-masing sebesar Rp134.755 dan Rp135.958.

58. TANGGUNG JAWAB SOSIAL DAN LINGKUNGAN (TJSL) EXPENSE

TJSL expense that was charged to profit or loss amounted to Rp134,755 and Rp135,958 for the period ended 31 December 2024 and 2023, respectively.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia:

a. Giro pada Bank Indonesia

Bank dipersyaratkan untuk memiliki Giro Wajib Minimum (GWM) dalam mata uang Rupiah dalam kegiatannya sebagai bank umum, serta GWM dalam mata uang asing dalam kegiatannya melakukan transaksi mata uang asing.

Pada tanggal 31 Desember 2024 dan 2023, Giro Wajib Minimum (GWM) Bank telah sesuai dengan Peraturan Bank Indonesia (PBI) No. 24/4/PBI/2022 tanggal 1 Maret 2022 tentang Giro Wajib Minimum Bank Umum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional dan Peraturan Anggota Dewan Gubernur (PADG) No. 24/8/PADG/2022 tanggal 30 Juni 2022, yang masing-masing sebesar:

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards:

a. Current accounts with Bank Indonesia

The Bank is required to maintain Minimum Statutory Reserves (GWM) in Rupiah for conventional bank and Minimum Statutory Reserves in foreign currencies for foreign exchange transactions.

As of 31 December 2024 and 2023, the Bank's Minimum Statutory Reserve complied with Bank Indonesia (BI) Regulation PBI No. 24/4/PBI/2022 dated 1 March 2022 and Regulation of Members of The Board of Governors (PADG) No. 24/8/PADG/2022 dated 30 June 2022 concerning Minimum Statutory Reserve of Commercial Banks with BI in Rupiah and foreign currency, which are as follows:

	2024	2023	
Rupiah			*Rupiah*
- GWM Primer	6.40%	6.80%	*Primary Statutory Reserve -*
Harian*)	0.00%	0.00%	*Daily*)*
Rata-rata*)	6.40%	6.80%	*Average*)*
- PLM**)	5.00%	5.00%	*MPLB**) -
Mata uang asing	4.00%	4.00%	*Foreign Currencies*
Harian	2.00%	2.00%	*Daily*
Rata-rata	2.00%	2.00%	*Average*

*) Berdasarkan PADG Nomor 12 Tahun 2023 tanggal 27 September 2023, Bank mendapatkan insentif berupa kelonggaran GWM dalam Rupiah pada 31 Desember 2024 sebesar 2,60% karena Bank melakukan penyediaan dana untuk kegiatan ekonomi tertentu dan inklusif. GWM dalam Rupiah yang harus dipenuhi Bank pada 31 Desember 2024 yang seharusnya sebesar 9,00% dengan ketentuan harian 0,00% dan rata-rata 9,00% menjadi sebesar 6,40% dengan ketentuan harian 0,00% dan rata-rata 6,40%.

**) Berdasarkan PADG Nomor 18 Tahun 2023 tanggal 29 November 2023, kebijakan pemenuhan Penyangga Likuiditas Makroprudensial (PLM) ditetapkan sebesar 5,00%.

*) *Based on PADG No. 12/2023 dated 27 September 2023, Bank gets incentives in the form of relaxation of the Statutory Reserves in Rupiah on 31 December 2024 amounting to 2.60% because Bank provides funds for certain and inclusive economic activities. The Statutory Reserves in Rupiah that must be fulfilled by the Bank on 31 December 2024 which should be 9.00% with daily provisions of 0.00% and an average of 9.00% become 6.40% with daily provisions of 0.00% and an average of 6.40%.*

**) *Based on PADG No. 18/2023 dated 29 November 2023, the policy regarding fulfillment of Macroprudential Liquidity Buffer (MPLB) is set at 5.00%.*

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

a. Giro pada Bank Indonesia (lanjutan)

Giro Wajib Minimum (GWM) adalah simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia. Penyangga Likuiditas Makroprudensial (PLM) adalah cadangan minimum yang wajib dipelihara oleh Bank berupa Sertifikat Bank Indonesia (SBI), Sertifikat Deposito Bank Indonesia (SDBI), Sukuk Bank Indonesia (SukBI) dan/atau Surat Berharga Negara (SBN). Giro RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia. Berdasarkan PADG No. 23/7/PADG/2021 tanggal 26 April 2021, besaran dan parameter yang digunakan dalam pemenuhan Giro RIM adalah batas bawah target sebesar 84% dan batas atas target sebesar 94% dengan Kewajiban Penyediaan Modal Minimum (KPMM) insentif sebesar 14%.

Rasio Giro Wajib Minimum untuk rekening Rupiah dan mata uang asing pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar:

	2024	2023	
Rupiah			*Rupiah*
- GWM Primer	6.51%	9.53%	*Primary Statutory Reserve -*
Harian	0.00%	0.00%	*Daily*
Rata-rata	6.51%	9.53%	*Average*
- PLM	14.77%	15.05%	*MPLB -*
Mata uang asing	4.01%	4.01%	*Foreign currencies*
Harian	2.00%	2.00%	*Daily*
Rata-rata	2.01%	2.01%	*Average*

BNI telah memenuhi ketentuan Bank Indonesia tentang Giro Wajib Minimum pada tanggal 31 Desember 2024 dan 2023.

Pengungkapan lebih lanjut pada giro pada Bank Indonesia diungkapkan pada Catatan 5.

b. Giro pada bank lain

Berdasarkan kolektibilitas sesuai Peraturan OJK

Seluruh giro pada bank lain pada tanggal-tanggal 31 Desember 2024 dan 2023 diklasifikasikan lancar.

Pengungkapan lebih lanjut pada giro pada bank lain diungkapkan pada Catatan 6.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

a. Current accounts with Bank Indonesia *(continued)*

Minimum Statutory Reserve is a minimum reserve that should be maintained by the Bank in Current Accounts with Bank Indonesia. Macroprudential Liquidity Buffer (MPLB) are the minimum reserves that should be maintained by the Bank which comprised of Certificates of Bank Indonesia (SBI), Certificates Deposit of Bank Indonesia (SDBI), Sukuk of Bank Indonesia (SukBI), and/or Government Securities (SBN). RIM Current Account is an additional reserve that should be maintained by the Bank in the form of Current Accounts with Bank Indonesia. Based on PADG No. 23/7/PADG/2021 dated 26 April 2021, the amount and parameters used in fulfilling RIM Current Account are the lower target limit of 84% and the upper target limit of 94% with a Capital Adequacy Ratio (CAR) incentive of 14%.

The ratio of the Minimum Statutory Reserve requirement for its Rupiah and foreign currencies accounts as of 31 December 2024 and 2023, are as follows:

BNI has complied with the Bank Indonesia regulations regarding the Minimum Statutory Reserve as of 31 December 2024 and 2023.

The further disclosures on current accounts with Bank Indonesia are presented in Note 5.

b. Current accounts with other banks

By Financial Service Authority Rule collectibility

All current accounts with other banks as of 31 December 2024 and 2023 are classified as current.

The further disclosures on current accounts with other banks are presented in Note 6.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

c. Penempatan pada bank lain dan Bank Indonesia

Berdasarkan kolektibilitas sesuai Peraturan OJK

Seluruh penempatan pada bank lain dan Bank Indonesia pada tanggal-tanggal 31 Desember 2024 dan 2023 diklasifikasikan sebagai lancar.

Pengungkapan lebih lanjut pada penempatan pada bank lain dan Bank Indonesia diungkapkan pada Catatan 7.

c. Placements with other banks and Bank Indonesia

By Financial Service Authority Rule collectibility

All placements with other banks and Bank Indonesia as of 31 December 2024 and 2023 are classified as current.

The further disclosures on placement with other banks and Bank Indonesia are presented in Note 7.

d. Efek-efek

Berdasarkan kolektibilitas sesuai Peraturan OJK

d. Marketable securities

By Financial Service Authority Rule collectibility

	2024		2023		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	48,210,907	(273)	36,873,566	(151)	*Current*
Kurang lancar*)	316,989	-	291,324	-	*Substandard*)*
Macet	-	-	242,790	(242,790)	*Loss*
	48,534,346	**(273)**	**37,407,680**	**(242,941)**	

*) Cadangan kerugian penurunan nilai pada efek-efek dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

*) *Allowance for impairment losses on marketable securities classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

Pengungkapan lebih lanjut pada efek-efek diungkapkan pada Catatan 8.

The further disclosures on marketable securities are presented in Note 8.

e. Wesel ekspor dan tagihan lainnya

Berdasarkan kolektibilitas sesuai Peraturan OJK

e. Bills and other receivables

By Financial Service Authority Rule collectibility

	2024		2023		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	13,295,854	(52,828)	19,277,495	(278,501)	*Current*
	13,295,854	**(52,828)**	**19,277,495**	**(278,501)**	

Pengungkapan lebih lanjut pada wesel ekspor dan tagihan lainnya diungkapkan pada Catatan 9.

The further disclosures on bills and other receivables are presented in Note 9.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

f. Tagihan akseptasi

f. Acceptance receivables

Berdasarkan kolektibilitas sesuai Peraturan OJK

By Financial Service Authority Rule collectibility

	2024		2023		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	15,966,466	(85,551)	17,568,675	(477,481)	*Current*
Dalam perhatian khusus	52,304	(7,698)	-	-	*Special mention*
	16,018,770	**(93,249)**	**17,568,675**	**(477,481)**	

Pengungkapan lebih lanjut pada tagihan akseptasi diungkapkan pada Catatan 10.

The further disclosures on acceptance receivables are presented in Note 10.

g. Tagihan dan liabilitas derivatif

g. Derivative receivable and payables

Berdasarkan hasil penelaahan dan evaluasi manajemen Bank, seluruh tagihan derivatif pada tanggal 31 Desember 2024 dan 2023 digolongkan lancar.

Based on the Bank's management review and evaluation, all derivative receivables as of 31 December 2024 and 2023 are classified as current.

Pengungkapan lebih lanjut pada tagihan dan liabilitas derivatif diungkapkan pada Catatan 11.

The further disclosures on derivative receivables and payables are presented in Note 11.

h. Pinjaman yang diberikan

h. Loans

Berdasarkan kolektibilitas sesuai Peraturan OJK

By Financial Service Authority Rule collectibility

	2024		2023		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	731,053,036	(12,730,108)	646,348,458	(15,011,241)	*Current*
Dalam perhatian khusus	29,565,938	(16,433,250)	33,900,760	(21,536,797)	*Special mention*
Kurang lancar	3,837,708	(2,248,250)	2,954,368	(1,989,252)	*Substandard*
Diragukan	2,137,988	(1,221,285)	2,822,349	(1,994,520)	*Doubtful*
Macet	9,277,108	(6,051,627)	9,058,834	(6,626,321)	*Loss*
	775,871,778	**(38,684,520)**	**695,084,769**	**(47,158,131)**	

Pengungkapan lebih lanjut pada pinjaman yang diberikan diungkapkan pada Catatan 12.

The further disclosures on loans are presented in Note 12.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

h. Pinjaman yang diberikan (lanjutan)

Pinjaman bermasalah dan cadangan kerugian penurunan nilai berdasarkan sektor ekonomi

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

h. Loans *(continued)*

Non-performing loans and allowance for impairment losses by economic sector

	2024		2023		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Perindustrian	3,995,256	(2,403,477)	3,489,493	(2,548,143)	*Manufacturing*
Perdagangan, restoran dan hotel	4,251,648	(2,532,619)	3,764,179	(2,467,235)	*Trading, restaurants and hotels*
Pertanian	1,133,250	(734,684)	852,957	(485,270)	*Agriculture*
Jasa dunia usaha	556,739	(347,782)	1,711,936	(1,438,661)	*Business services*
Pengangkutan, pergudangan dan komunikasi	1,649,543	(1,314,101)	656,816	(507,106)	*Transportation, warehousing and communications*
Konstruksi	429,856	(322,748)	853,233	(614,290)	*Construction*
Jasa pelayanan sosial	237,474	(127,783)	286,902	(158,832)	*Social services*
Pertambangan	66,177	(40,113)	785,105	(674,164)	*Mining*
Listrik, gas dan air	39,368	(25,659)	236,446	(227,038)	*Electricity, gas and water*
Lain-lain	2,893,493	(1,672,196)	2,198,484	(1,489,354)	*Others*
	15,252,804	**(9,521,162)**	**14,835,551**	**(10,610,093)**	

Rasio kredit bermasalah BNI dan Entitas Anak secara *gross* (sebelum dikurangi cadangan kerugian penurunan nilai) sesuai dengan peraturan OJK yang berlaku pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar 1,97% dan 2,13% (rasio untuk BNI saja 1,97% dan 2,14% masing-masing pada tanggal 31 Desember 2024 dan 2023), sedangkan rasio kredit bermasalah BNI dan Entitas Anak secara neto pada tanggal 31 Desember 2024 dan 2023 masing-masing sebesar 0,74% dan 0,61% (rasio untuk BNI saja 0,74% dan 0,61% masing-masing pada tanggal 31 Desember 2024 dan 2023). Pengungkapan lebih lanjut pada pinjaman yang diberikan diungkapkan pada Catatan 12.

The non-performing loans ratio of BNI and Subsidiaries on a gross basis (before deducting the allowance for impairment losses) in accordance with the OJK regulation as of 31 December 2024 and 2023 were 1.97% and 2.13%, respectively (the ratios for BNI only were 1.97% and 2.14% as of 31 December 2024 and 2023, respectively), while the non-performing loans ratio of BNI and Subsidiaries on a net basis as of 31 December 2024 and 2023 were 0.74% and 0.61%, respectively (the ratios for BNI only were 0.74% and 0.61% as of 31 December 2024 and 2023, respectively). The further disclosures on loans are presented in Note 12.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

h. Pinjaman yang diberikan (lanjutan)

Pinjaman yang direstrukturisasi

Jumlah kredit yang telah direstrukturisasi dan dalam kategori kredit bermasalah berdasarkan peraturan OJK pada tanggal 31 Desember 2024 dan 2023 adalah masing-masing sebesar Rp7.024.794 dan Rp5.428.100.

Informasi pokok lainnya sehubungan dengan pinjaman yang diberikan

Pada tanggal 31 Desember 2024 dan 2023, tidak terdapat pelanggaran maupun pelampauan Batas Maksimum Pemberian Kredit (BMPK) kepada pihak berelasi dan pihak ketiga sesuai dengan peraturan yang ditetapkan Otoritas Jasa Keuangan.

i. Efek-efek yang dibeli dengan janji dijual kembali

Efek-efek yang dibeli dengan janji dijual kembali yang diungkapkan pada Catatan 14 diklasifikasikan berdasarkan kolektabilitas sesuai dengan peraturan OJK sebagai lancar.

j. Penyertaan saham - bersih

Penyertaan jangka panjang berdasarkan kolektibilitas sesuai Peraturan OJK adalah:

	2024	2023	
Lancar	593,137	563,700	*Current*
Total	593,137	563,700	*Total*

Pengungkapan lebih lanjut pada penyertaan saham - bersih diungkapkan pada Catatan 17.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

h. Loans *(continued)*

Restructured loans

The total of restructured loans that are categorised as non-performing loan based on OJK's regulation amounted to Rp7,024,794 and Rp5,428,100 as of 31 December 2024 and 2023, respectively.

Other significant information relating to loans

As of 31 December 2024 and 2023, there is neither any breach nor violation of Legal Lending Limit (LLL) to related parties and third parties as required by Regulation of Financial Services Authority.

i. Securities purchased under agreements to resell

Securities purchased under agreements to resell disclosed in Note 14 are classified by Financial Service Authority rule collectability as current.

j. Equity investments - net

The classification of long-term equity investments based on Financial Service Authority Rule collectibility are as follows:

The further disclosures on equity investment - net are presented in Note 17.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

k. Komitmen dan Kontinjensi

Transaksi komitmen dan kontinjensi yang mempunyai risiko kredit berdasarkan kolektibilitas adalah sebagai berikut:

k. Commitments and Contingencies

Commitments and contingent transactions that have credit risk by collectability are as follows:

	2024	2023	
Lancar	137,900,021	135,986,477	*Current*
Dalam perhatian khusus	2,128,420	2,879,288	*Special mention*
Kurang lancar	41,844	67,806	*Substandard*
Diragukan	54,329	80,154	*Doubtful*
Macet	831,833	500,973	*Loss*
	140,956,447	**139,514,698**	

Pengungkapan lebih lanjut pada komitmen dan kontinjensi diungkapkan pada Catatan 44.

The further disclosures on commitments and contingencies are presented in Note 44.

l. Manajemen risiko

Penerapan Manajemen Risiko BNI berlandaskan pada regulasi nasional maupun internasional, meliputi Peraturan Otoritas Jasa Keuangan (POJK), Surat Edaran Otoritas Jasa Keuangan (SEOJK), Peraturan Bank Indonesia (PBI), Surat Edaran Bank Indonesia (SEBI), dan dokumen *Basel Committee on Banking Supervision* (BCBS).

Beberapa regulasi yang terkait dengan Manajemen Risiko Bank adalah sebagai berikut:

1. POJK No.18/POJK.03/2016 tanggal 16 Maret 2016 dan SEOJK No.34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.

2. POJK No. 38/POJK.03/2017 tanggal 12 Juli 2017 dan SEOJK No. 43/SEOJK.03/2017 tanggal 19 Juli 2017 tentang Prinsip Kehati-hatian dan Laporan dalam rangka Penerapan Manajemen Risiko secara Konsolidasi bagi Bank yang Melakukan Pengendalian terhadap Perusahaan Anak.

3. POJK No.17/POJK.03/2014 tanggal 19 November 2014 dan SEOJK No.14/ SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan.

l. Risk management

The implementation of BNI Risk Management is based on national and international regulations, including Financial Services Authority Regulations (POJK), Financial Services Authority Circular Letters (SEOJK), Bank Indonesia Regulations (PBI), Bank Indonesia Circular Letters (SEBI), and Basel Committee on Banking Supervision (BCBS).

Some of the agreements related to the Bank's Risk Management are as follows:

1. *POJK No. 18/POJK.03/2016, dated 16 March 2016 and SEOJK No.34/SEOJK.03/2016 dated 1 September of 2016 concerning the Implementation of Risk Management for Commercial Banks.*

2. *POJK No. 38/POJK.03/2017 dated 12 July 2017 and SEOJK No. 43/SEOJK.03/2017 dated 19 July 2017 concerning Prudential Principles and Reports within the framework of the Application of Consolidated Risk Management for Banks that Control Subsidiaries.*

3. *POJK No.17/POJK.03/2014 dated 19 November 2014 and SEOJK No.14/ SEOJK.03 /2015 dated 25 May 2015 concerning the Implementation of Integrated Risk Management for Financial Conglomerates.*

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

BNI juga melakukan pengelolaan terhadap risiko lainnya sesuai aturan Regulator, yaitu (i) risiko hukum untuk mengurangi kemungkinan kerugian dari tuntutan hukum atau kelemahan aspek yuridis seperti ketiadaan peraturan perundang-undangan yang mendukung atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak atau pengikatan agunan yang tidak sempurna; (ii) risiko reputasi untuk mengurangi kemungkinan kerugian akibat menurunnya tingkat kepercayaan pemangku kepentingan (*stakeholder*) yang bersumber dari persepsi negatif terhadap Bank; (iii) risiko stratejik untuk mengurangi kemungkinan kerugian akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan stratejik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis; dan (iv) risiko kepatuhan untuk mengurangi kemungkinan kerugian karena Bank tidak mematuhi atau tidak melaksanakan peraturan perundang-undangan dan ketentuan.

Upaya-upaya yang dilakukan untuk mengelola risiko hukum, risiko reputasi, risiko stratejik dan risiko kepatuhan seperti tersebut di atas diantaranya adalah:

- Mengelola Pedoman Perusahaan untuk manajemen risiko hukum, risiko reputasi, risiko stratejik, dan risiko kepatuhan;
- Melakukan analisis aspek risiko hukum dan uji kepatuhan terhadap produk atau aktivitas *existing* dan baru;
- Melakukan kaji ulang berkala terhadap format standar perjanjian, khususnya perjanjian kredit, guna memastikan kesesuaian dengan peraturan perundang-undangan;
- Melakukan kaji ulang secara berkala terhadap kontrak dan perjanjian antara BNI dengan pihak lain, antara lain dengan cara melakukan penilaian kembali terhadap efektivitas proses *enforcement* guna mengecek validitas hak dalam kontrak dan perjanjian yang ada;
- Melakukan pengelolaan komplain/keluhan nasabah dengan optimalisasi fungsi sarana *Online Request Management* (ORM), selanjutnya menyelesaikan permasalahan tersebut;

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

BNI also has risk management for other risks as regulated by Regulator, as follows (i) legal risk to minimise possible losses from lawsuits or weakness in juridical aspects such as the absence of laws and regulations, or weaknesses such as non-compliance with the terms of the engagements validity of contracts or imperfect binding of collaterals; (ii) reputation risk to minimise possible losses due to stakeholder's declining levels of trust which comes from the negative perception of the Bank; (iii) strategic risk to minimise possible losses arising from inappropriate or improper implementation of the Bank's strategy and business decisions, or strategy that is not responsive to external changes; and (iv) compliance risk to minimise possible losses of the Bank from non-compliance or failure to implement the prevailing laws and regulations.

The initiatives taken to manage legal risk, reputation risk, strategic risk and compliance risk as described above, among others, are as follows:

- *Manage Operational Guidance Manual for legal risk, reputation risk, strategic risk, and compliance risk;*
- *Analysis of the legal aspects and compliance test for existing and new product or activities;*
- *Conduct periodic reviews of the standard format of the agreement, especially the credit agreement, to ensure compliance with statutory regulations;*
- *Conduct periodic reviews of contracts and agreements between BNI and other parties, among others by reassessing the effectiveness of the enforcement process to check the validity of rights in existing contracts and agreements;*
- *Manage customer complaints by optimizing the function of Online Request Management (ORM) facilities, then resolve the issue;*

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

Upaya-upaya yang dilakukan untuk mengelola risiko hukum, risiko reputasi, risiko stratejik dan risiko kepatuhan seperti tersebut di atas diantaranya adalah: (lanjutan)

- Mengelola jumlah pemberitaan negatif yang ada di media, baik media cetak maupun media elektronik dan menindaklanjuti pemberitaan tersebut sesuai dengan ketentuan;
- Melakukan perencanaan strategis melalui serangkaian proses untuk penyelarasan strategi perusahaan dengan strategi unit;
- Melakukan pemantauan pencapaian rencana bisnis yang telah ditetapkan, dilakukan dengan membandingkan target terhadap realisasi bisnis;
- Melakukan sertifikasi kepatuhan terhadap kebijakan dan prosedur sesuai dengan ketentuan; dan
- Melakukan pemantauan terhadap jenis, signifikansi dan frekuensi pelanggaran terhadap ketentuan (*track record* kepatuhan BNI).

Sesuai dengan Surat Edaran OJK (SEOJK) No.14/SEOJK.03/2015, BNI selaku Entitas Utama Konglomerasi Keuangan wajib menerapkan Manajemen Risiko Terintegrasi secara komprehensif dan efektif. Tujuan penerapan manajemen risiko terintegrasi tersebut yaitu untuk mengelola seluruh risiko yang melekat pada aktivitas/kegiatan usaha konglomerasi keuangan BNI serta menciptakan keunggulan kompetitif dan memelihara pertumbuhan yang berkesinambungan sehingga dapat meningkatkan nilai (*shareholder value*) konglomerasi keuangan BNI secara keseluruhan.

Secara umum, seluruh Lembaga Jasa Keuangan (LJK) anggota Konglomerasi Keuangan BNI, baik BNI sebagai LJK Induk (Entitas Utama) dan masing-masing LJK Anak telah menerapkan manajemen risiko, antara lain dengan membentuk unit risiko pada masing-masing LJK. Manajemen risiko pada masing-masing LJK Anak secara operasional dilakukan terpisah dari unit bisnis dan menjalankan fungsinya secara independen. Untuk mendukung penerapan manajemen risiko, pada organisasi LJK Anak juga dibentuk unit/fungsi internal yang melakukan pemantauan kepatuhan terhadap kontrol internal secara rutin dan berkala.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

The initiatives taken to manage legal risk, reputation risk, strategic risk and compliance risk as described above, among others, are as follows: (continued)

- *Managing the amounts of negative news on media, whether printed or electronic media, and follow up the proclamation in accordance with the prevailing policies;*
- *The strategic planning done through a series of strategic planning process to align the corporate strategy and strategy unit;*
- *Planning the completion of a business that has been determined, is done by comparing the target to the realisation of the business;*
- *Compliance certification to all policies and procedures in accordance with applicable regulations; and*
- *Monitoring of types, significance and frequency of violations of regulations (BNI compliance track record).*

In accordance with the Circular Letter of Financial Services Authority regulations (SEOJK) No. 14/SEOJK.03/2015, BNI as the parent entity of a financial conglomerate has to implement the integrated risk management comprehensively and effectively. The purpose of the implementation of integrated risk management implementation is to manage the whole inherent risks in the financial conglomerate's business activities, and also to create competitive advantages and maintain sustainable growth, so that it can increase the financial conglomeration shareholder value of BNI as a whole.

Generally, all of the Financial Services Institutions (FSI) as part of the BNI Financial Conglomeration, where BNI as the Parent FSI (Main Entity) and each Subsidiaries FSI have implemented risk management, among others by establishing a risk unit in each FSI. Risk management in each FSI is operating separately from the business unit and conducts its function independently. To support the implementation of risk management, the FSI have established internal control units/function in their organizational structure, which monitors the compliance with internal controls regularly and periodically on a regular basis.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

Disamping itu, Dewan Komisaris dan Direksi pada masing-masing LJK Anak secara aktif juga melakukan pemantauan, dan evaluasi melalui laporan-laporan yang disampaikan oleh setiap LJK Anak untuk selanjutnya digunakan sebagai salah satu bahan pertimbangan dalam menetapkan kebijakan pada LJK Anak.

BNI selaku Entitas Utama telah melakukan koordinasi dengan LJK Anak untuk menerapkan manajemen risiko sesuai ketentuan Otoritas Jasa Keuangan, antara lain dengan melakukan pemantauan dan pengukuran risiko yang dituangkan dalam bentuk penilaian Kecukupan Penyediaan Modal Minimum (KPMM) Konsolidasi, KPMM Terintegrasi, penilaian Tingkat Kesehatan Bank (TKB) konsolidasi, serta penilaian Profil Risiko Konsolidasi dan penilaian Profil Risiko Terintegrasi Konglomerasi Keuangan BNI (tidak diaudit).

Penilaian profil risiko BNI individu menggambarkan risiko yang melekat dalam kegiatan bisnis Bank (*inherent risk*) termasuk kualitas penerapan Manajemen Risiko yang mencerminkan sistem pengendalian risiko (*risk control system*) pada 8 (delapan) jenis risiko yaitu Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Reputasi, Risiko Stratejik, dan Risiko Kepatuhan. Penilaian Profil Risiko BNI telah dilakukan sesuai dengan lampiran SEOJK No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

Berdasarkan hasil laporan terakhir atas penilaian sendiri (*self-assessment*), peringkat risiko inheren BNI posisi 31 Desember 2024 adalah *low to moderate* dengan peringkat kualitas penerapan manajemen risiko yang memadai (*satisfactory*) sehingga peringkat komposit Profil Risiko BNI adalah 2 (*low to moderate*) (tidak diaudit).

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

In addition, the Boards of Commissioners and Directors of the respective Subsidiaries actively monitor and evaluate the internal controls of the Subsidiaries, through the reports submitted by the respective Subsidiaries, as a basis in formulating and developing appropriate policies for the Subsidiaries.

As the Parent Entity, BNI coordinates with its FSI Subsidiaries regarding the implementation of risk management policies as defined by Indonesia Financial Services Authority, among others by implementing risk monitoring and measurement in the form of consolidated Capital Adequacy Ratio (CAR) assessment, integrated Capital Adequacy Ratio (CAR) assessment, the Bank's consolidated soundness rating consolidated assessment, consolidated risk profile and also integrated risk profile assessment on BNI Financial Conglomeration (unaudited).

The risk profile assessment of BNI reflects the inherent risk of the Bank's business, including the risk control system for 8 (eight) type of risk are assessed are Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputation Risk, Strategic Risk, and Compliance Risk. The risk profile of BNI has been performed based on attachment of SEOJK No. 14/SEOJK.03/2017 about the Bank's Soundness Rating Assessment.

Based on the results of a recent self-assessment report, inherent risk rank of BNI as of 31 December 2024 is low to moderate and the quality of the risk management implementation rank is satisfactory, therefore the risk profile composite rank of BNI is 2 (low to moderate) (unaudited).

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

Penilaian Profil Risiko Terintegrasi merupakan penilaian terhadap 10 (sepuluh) jenis Risiko berdasarkan Risiko Inheren dan Kualitas Penerapan Manajemen Risiko (KPMR) terintegrasi. Kesepuluh jenis Risiko tersebut adalah Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Reputasi, Risiko Stratejik, Risiko Kepatuhan, Risiko Transaksi Intra-Grup dan Risiko Asuransi. Penilaian Profil Risiko BNI Terintegrasi tersebut telah dilakukan sesuai dengan lampiran SEOJK No. 14/SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan.

Penilaian Profil Risiko Terintegrasi dilakukan semesteran. Berdasarkan hasil laporan terakhir secara penilaian sendiri (*self assessment*), peringkat risiko inheren posisi 31 Desember 2024 adalah *low to moderate* dengan peringkat kualitas penerapan manajemen risiko yang memadai (*satisfactory*) sehingga peringkat komposit Profil Risiko Konglomerasi Keuangan BNI adalah 2 *(low to moderate)* (tidak diaudit).

Tingkat Kesehatan Bank (TKB) BNI posisi 31 Desember 2024 yang dilakukan secara self assessment berada pada Peringkat 2 (PK 2) dengan predikat "sehat" atau stabil dibandingkan dengan TKB BNI posisi 31 Desember 2023 (tidak diaudit).

1. Profil Risiko
   Hasil penilaian Profil Risiko BNI posisi 31 Desember 2024 masih stabil di Peringkat 2 *(Low to Moderate)*.

2. Rentabilitas
   Terjadi penurunan tren risiko pada parameter Rentabilitas yang dipicu oleh pencapaian rasio profitabilitas yang telah membaik dan sesuai target.

3. Permodalan
   Penurunan tren risiko pada parameter permodalan diakibatkan peningkatan rasio CAR BNI karena peningkatan total modal BNI secara modal tier 1 melalui laba ditahan serta penerbitan *Additional Tier 1 Capital Securities* dan peningkatan modal tier 2 melalui penerbitan *subdebt*.

4. Tata Kelola
   Tata kelola BNI posisi 31 Desember 2024 dibandingkan dengan posisi 31 Desember 2023 relatif stabil.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

Integrated Risk Profile assessment is the assessment of the 10 (ten) types of risks based on Inherent Risks and the integrated Implementation of Risk Management Quality (KPMR). The ten types of Risks being assessed are Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputation Risk, Strategic Risk, Compliance Risk, Intra Group Transactions Risk and Insurance Risk. Assessment of the Integrated Risk Profile has complied with the SEOJK No. 14/SEOJK.03/2015 dated 25 May 2015 about Integrated Risk Management Implementation for Financial Conglomerate.

Integrated Risk Profile assessment is conducted semi annually. Based on the results of the last self- assessment report, the inherent risk rank of BNI as of 31 December 2024 is low to moderate with the quality of the risk management implementation rank as satisfactory, therefore the composite rank of BNI's Risk Profile as a financial conglomeration is 2 (low to moderate) (unaudited).

BNI Bank Soundness Level (TKB) self assessment for the position as of 31 December 2024 which is in Rank 2 (PK 2) with the predicate "healthy" or stable compared to the TKB BNI at the position in 31 December 2023 (unaudited).

1. *Risk Profile*
   The results of the BNI Risk Profile assessment for the position 31 December 2024 are still stable at Rank 2 (Low to Moderate).

2. *Rentability*
   The decreasing of risk trend which occurred in Rentability parameter which was triggered by improvement of the achievement of a profitability ratio as target.

3. *Capital*
   The decreasing risk trend in the capital parameter was due to an increase in the BNI's total capital component due to an increase of BNI's tier 1 capital from retained earnings as well as issuance of Additional Tier 1 Capital Securities and increase of tier 2 capital due to subdebt issuance.

4. *Governance*
   BNI's governance for the position of 31 December 2024 is relatively stable compared to the position in 31 December 2023.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

Guna melakukan penguatan fungsi manajemen risiko, BNI juga melakukan beberapa upaya antara lain:

1. Simulasi Kondisi Terburuk dan *Stress Testing*.

   Stress testing merupakan salah satu alat manajemen risiko yang digunakan BNI untuk mengevaluasi dampak suatu skenario yang *severe* namun mungkin terjadi (*plausible*) terhadap kondisi finansial Bank. BNI melakukan *stress testing* secara berkala sebagai salah satu dasar pertimbangan untuk keputusan dan arahan direksi dan dewan komisaris atau dalam pengambilan keputusan Bank serta sebagai pemenuhan atas ketentuan regulasi yang berlaku baik di Indonesia maupun ketentuan regulator pada masing-masing Kantor Luar Negeri (KLN). Selain sebagai dasar pengambilan keputusan dan pemenuhan regulasi, stress testing juga bertujuan untuk mengestimasi besarnya kerugian yang akan timbul serta ketahanan modal Bank dalam menyerap kerugian tersebut dan mengidentifikasi langkah-langkah yang harus dilakukan untuk memitigasi risiko dan menjaga ketahanan modal Bank. Dalam hal likuiditas, *stress test* berfungsi untuk mengestimasi kecukupan alat likuid Bank untuk memenuhi kewajiban, baik kontraktual maupun *behavioral*.

   Hasil *stress testing* yang dilakukan BNI sepanjang tahun 2023 menunjukkan bahwa permodalan BNI masih mampu untuk menyerap kerugian yang akan timbul serta mampu menjaga kecukupan likuiditas dengan antisipasi yang cepat pada sisi pengelolaan aset dan liabilitas serta kesiapan kebijakan pendukung rencana pendanaan. Selain itu, BNI juga telah menetapkan mitigasi risiko atas kemungkinan kerugian yang akan timbul.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

In order to strengthen the risk management function, BNI has also carried out several efforts, including:

1. Worst Condition Simulation and Stress Testing.

   Stress testing is one of the risk management tools used by BNI to evaluate the impact of a severe but plausible scenario on the Bank's financial condition. BNI carries out stress testing periodically as a basis for consideration for decisions and directions of the board of directors and board of commissioners or in making Bank decisions as well as in compliance with applicable regulatory provisions both in Indonesia and regulatory provisions at each Foreign Office (KLN). Apart from being a basis for decision making and compliance with regulations, stress testing also aims to estimate the magnitude of losses that will arise as well as the resilience of the Bank's capital in absorbing these losses and identifying steps that must be taken to mitigate risks and maintain the resilience of the Bank's capital. In terms of liquidity, the stress test functions to estimate the adequacy of the Bank's liquid assets to fulfill obligations, both contractual and behavioral.

   The results of stress testing carried out by BNI throughout 2023 show that BNI's capital is still able to absorb losses that will arise and is able to maintain sufficient liquidity with rapid anticipation in terms of asset and liability management as well as the readiness of policies to support funding plans. Apart from that, BNI has also established risk mitigation for possible losses that may arise.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

2. Penyusunan Rencana Aksi *(Recovery Plan)* dan Rencana Resolusi *(Resolution Plan)*.

Recovery Plan merupakan rencana untuk mengatasi (mencegah, memulihkan dan memperbaiki) permasalahan keuangan yang mungkin terjadi di Bank Sistemik. Penyusunan *Recovery Plan* merupakan pemenuhan atas Peraturan OJK No. 14/POJK.03/2017 tanggal 4 April 2017 tentang Rencana Aksi (*Recovery Plan*) bagi Bank Sistemik, yang dimaksudkan untuk mengatasi secara dini permasalahan keuangan yang mungkin terjadi pada Bank sistemik melalui mekanisme *"bail in"* sehingga permasalahan keuangan tersebut diharapkan tidak sampai memicu dampak sistemik bagi sistem keuangan nasional. BNI sebagai Bank Sistemik wajib menyusun *Recovery Plan* kepada OJK setiap tahun secara berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun dan menyampaikan pengkinian Rencana Aksi kepada OJK paling lama akhir bulan November.

Resolution Plan merupakan rencana penanganan atau penyelesaian oleh Lembaga Penjamin Simpanan (LPS) ketika Bank dinyatakan sebagai bank gagal, tertuang dalam dokumen *Resolution Plan* yang di-*review* secara periodik setiap 2 (dua) tahun sekali. Penyusunan *Resolution Plan* merupakan pemenuhan atas Peraturan Lembaga Penjamin Simpanan No. 1 Tahun 2021 tentang Rencana Resolusi bagi Bank Umum. Rencana Resolusi merupakan komitmen Bank, pemegang saham pengendali dan/atau pihak lain untuk mewujudkan resolusi Bank yang efektif guna mengurangi gangguan sistemik ke stabilitas sistem keuangan serta meminimalisir penggunaan dana publik (APBN) dalam resolusi Bank. Rencana Resolusi berisi informasi mengenai Bank yang sejalan dengan Rencana Aksi yang dilengkapi dengan analisa opsi resolusi dan potensi hambatan pelaksanaan opsi resolusi, serta strategi komunikasi sebelum dilakukannya penanganan permasalahan solvabilitas Bank oleh otoritas resolusi.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

2. Preparation of Recovery Plan and Resolution Plan.

The Recovery Plan is a plan to overcome (prevent, recover and repair) financial problems that may occur at Systemic Banks. The preparation of the Recovery Plan is a fulfillment of OJK Regulation No. 14/POJK.03/2017 dated 4 April 2017 concerning Action Plans (Recovery Plan) for Systemic Banks, which is intended to overcome early financial problems that may occur in systemic Banks through a "bail in" mechanism so that it is hoped that these financial problems will not trigger a systemic impact on the national financial system. BNI as a Systemic Bank is obliged to prepare a Recovery Plan to the OJK every year on a regular basis at least 1 (one) time in 1 (one) year and submit an updated Action Plan to the OJK no later than the end of November.

The Resolution Plan is a handling or resolution plan by the Deposit Insurance Corporation (LPS) when the Bank is declared as a failed bank, contained in the Resolution Plan document which is reviewed periodically every 2 (two) years. The preparation of the Resolution Plan is a fulfillment of the Deposit Insurance Corporation Regulation No. 1 of 2021 concerning Resolution Plans for Commercial Banks. The Resolution Plan is a commitment of the Bank, controlling shareholders and/or other parties to realise an effective Bank resolution to reduce systemic disruption to financial system stability and minimise the use of public funds (APBN) in Bank resolutions. The Resolution Plan contains information about the Bank that is in line with the Action Plan which is equipped with analysis of resolution options and potential obstacles to implementing resolution options, as well as communication strategies before handling Bank solvency problems by the resolution authority.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

3. Penilaian *Risk Maturity Index* (RMI).

Risk Maturity Index (RMI) merupakan indeks yang digunakan untuk mengukur efektivitas dan kualitas penerapan manajemen risiko dalam melindungi dan menciptakan nilai. Berdasarkan Surat Kementerian BUMN No. S-31/Wk2.MBU.A/ 09/2020 dimana disampaikan dalam rangka mengimplementasikan rencana strategis Kementerian BUMN tahun 2020–2024, sesuai Peraturan Menteri BUMN No. PER-08/MBU/08/2020 perlu dilakukan penguatan terhadap fungsi Manajemen Risiko salah satunya menetapkan nilai RMI sebagai salah satu indikator kinerja utama peningkatan pengelolaan Risiko BUMN. Hasil *assessment* RMI BNI telah mencapai skor *"Managed"* (tidak direviu dan tidak diaudit).

Dalam rangka pemenuhan kepatuhan terhadap Peraturan Menteri BUMN No. PER-02/ MBU/03/2023, maka akan dilakukan penilaian RMI secara berkelanjutan dengan memperhatikan keputusan deputi bidang keuangan dan manajemen risiko KBUMN No. SK-8/DKU.MBU/12/2023 tanggal 6 Desember 2023 tentang Petunjuk teknis RMI. Penilaian RMI akan dilakukan berbasis kinerja, yaitu menggabungkan penilaian RMI berdasarkan 5 dimensi yaitu (1) budaya & kapabilitas risiko, (2) organisasi & tata kelola risiko, (3) kerangka risiko & kepatuhan, (4) proses & kontrol risiko, dan (5) model, data, dan teknologi risiko, dengan realisasi kinerja yang terdiri dari Tingkat Kesehatan Peringkat Akhir (*final rating*) dan Peringkat Komposit Risiko.

Pengungkapan lebih lanjut pada manajemen risiko diungkapkan pada Catatan 47.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

I. Risk management *(continued)*

3. Risk Maturity Index (RMI) Assessment.

Risk Maturity Index (RMI) is an index used to measure the effectiveness and quality of implementing risk management in protecting and creating value. Based on the Letter of the Ministry of BUMN No. S-31/Wk2.MBU.A/ 09/2020 which was submitted in order to implement the strategic plan of the Ministry of BUMN for 2020–2024, in accordance with Minister of BUMN Regulation No. PER-08/MBU/08/2020 requires strengthening the Risk Management function, one of which is determining the RMI value as one of the main performance indicators for improving BUMN Risk management. BNI's RMI assessment results have achieved a "Managed" score (not reviewed and unaudited).

In order to fulfill compliance with BUMN Ministerial Regulation No. PER-02/ MBU/03/2023, an ongoing RMI assessment will be carried out taking into account the decision of the deputy for finance and risk management of KBUMN No. SK-8/DKU.MBU/12/2023 dated 6 December 2023 concerning RMI technical instructions. The RMI assessment will be carried out based on performance, namely combining RMI assessments based on 5 dimensions, namely (1) risk culture & capability, (2) risk organization & governance, (3) risk & compliance framework, (4) risk processes & controls, and (5) risk models, data and technology, with performance realization consisting of Final Rating Health Level and Risk Composite Rating.

The further disclosures on risk management are presented in Note 47.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

m. Risiko pasar

Risiko mata uang

Berikut adalah Posisi Devisa Neto (PDN), dalam nilai absolut, BNI pada tanggal 31 Desember 2024 per mata uang, sesuai dengan peraturan Bank Indonesia:

m. Market risk

Currency risk

Presented below is the Net Open Position (NOP), in absolute amounts, of BNI as of 31 December 2024 by currency, based on Bank Indonesia regulations:

	2024			
Mata Uang	**Aset/ *Assets***	**Liabilitas/ *Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	***Currencies***
KESELURUHAN (LAPORAN POSISI KEUANGAN DAN REKENING ADMINISTRATIF)				***AGGREGATE (STATEMENT OF FINANCIAL POSITION AND ADMINISTRATIVE ACCOUNTS)***
Dolar Amerika Serikat	504,259,275	504,848,665	589,390	*United States Dollar*
Yen Jepang	24,568,493	24,514,414	54,079	*Japanese Yen*
Euro Eropa	19,194,866	19,296,896	102,030	*European Euro*
Dolar Singapura	7,016,224	7,139,863	123,639	*Singapore Dollar*
Yuan China	5,773,744	5,585,695	188,049	*Chinese Yuan*
Pound sterling Inggris	1,252,126	1,286,866	34,740	*British Pound Sterling*
Dolar Hong Kong	908,009	891,483	16,526	*Hong Kong Dollar*
Lain-lain	5,049,417	4,913,311	210,189 *)	*Others*
			1,318,642	
LAPORAN POSISI KEUANGAN				***STATEMENT OF FINANCIAL POSITION***
Dolar Amerika Serikat	290,730,836	295,940,547	5,209,711	*United States Dollar*
Yen Jepang	16,231,952	16,223,421	8,531	*Japanese Yen*
Dolar Singapura	4,393,175	4,523,324	130,149	*Singapore Dollar*
Yuan China	3,095,469	2,965,492	129,977	*Chinese Yuan*
Euro Eropa	3,925,460	2,227,695	1,697,765	*European Euro*
Dolar Hong kong	364,731	233,401	131,330	*Hong Kong Dollar*
Pound sterling Inggris	419,095	130,399	288,696	*British Pound Sterling*
Lain-lain	3,291,288	2,113,416	1,177,872 *)	*Others*
			8,774,031	
Total Modal Tier I dan Tier II dikurangi penyertaan pada Entitas Anak (Catatan 53)			152,307,417	*Total Tier I and II Capital less investment in Subsidiaries (Note 53)*
Rasio PDN (Keseluruhan)			0.87%	*NOP Ratio (Aggregate)*
Rasio PDN (Laporan Posisi Keuangan)			5.76%	*NOP Ratio (Statement of Financial Position)*

*) Merupakan penjumlahan absolut dari selisih antara aset dan liabilitas dari beberapa mata uang asing lainnya

*) *Sum of the absolute values of the difference between assets and liabilities of some foreign currencies*

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

m. Risiko mata uang (lanjutan)

Berikut adalah Posisi Devisa Neto (PDN), dalam nilai absolut, BNI pada tanggal 31 Desember 2023 per mata uang, sesuai dengan peraturan Bank Indonesia:

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

m. Currency risk *(continued)*

Presented below is the Net Open Position, in absolute amounts, of BNI as of 31 December 2023 by currency, based on Bank Indonesia regulations:

	2023			
Mata Uang	**Aset/ *Assets***	**Liabilitas/ *Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	***Currencies***
KESELURUHAN (LAPORAN POSISI KEUANGAN DAN REKENING ADMINISTRATIF)				***AGGREGATE (STATEMENT OF FINANCIAL POSITION AND ADMINISTRATIVE ACCOUNTS)***
Dolar Amerika Serikat	482,966,619	483,490,720	524,101	*United States Dollar*
Yen Jepang	29,024,960	28,947,537	77,423	*Japanese Yen*
Euro Eropa	15,405,504	15,588,925	183,421	*European Euro*
Dolar Singapura	7,949,228	8,142,772	193,544	*Singapore Dollar*
Yuan China	5,144,957	5,127,937	17,020	*Chinese Yuan*
Pound sterling Inggris	1,074,447	1,182,796	108,349	*British Pound Sterling*
Dolar Hong Kong	718,810	610,388	108,422	*Hong Kong Dollar*
Lain-lain	5,081,804	4,253,755	1,177,646 *)	*Others*
			2,389,926	
LAPORAN POSISI KEUANGAN				***STATEMENT OF FINANCIAL POSITION***
Dolar Amerika Serikat	294,512,516	297,006,830	2,494,314	*United States Dollar*
Yen Jepang	15,239,293	16,812,444	1,573,151	*Japanese Yen*
Dolar Singapura	3,422,170	2,664,391	757,779	*Singapore Dollar*
Yuan China	2,893,282	2,593,590	299,692	*Chinese Yuan*
Euro Eropa	2,110,783	861,731	1,249,052	*European Euro*
Dolar Hong kong	411,655	241,927	169,728	*Hong Kong Dollar*
Pound sterling Inggris	213,355	91,092	122,263	*British Pound Sterling*
Lain-lain	2,179,517	1,078,579	1,100,938 *)	*Others*
			7,766,917	
Total Modal Tier I dan Tier II dikurangi penyertaan pada Entitas Anak (Catatan 53)			142,016,389	*Total Tier I and II Capital less investment in Subsidiaries (Note 53)*
Rasio PDN (Keseluruhan)			1.68%	*NOP Ratio (Aggregate)*
Rasio PDN (Laporan Posisi Keuangan)			5.47%	*NOP Ratio (Statement of Financial Position)*

*) Merupakan penjumlahan absolut dari selisih antara aset dan liabilitas beberapa mata uang asing lainnya

*) *Sum of the absolute values of the difference between assets and liabilities of some foreign currencies*

Pengungkapan lebih lanjut pada risiko pasar diungkapkan pada Catatan 50.

The further disclosures on market risk are presented in Note 50.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

n. Risiko operasional

Dalam rangka menerapkan manajemen risiko operasional, BNI mengacu pada ketentuan Bank Indonesia atau Otoritas Jasa Keuangan, serta *International Best Practices*. BNI juga memiliki prosedur manajemen risiko operasional yang disusun dan dievaluasi secara berkala sebagai pedoman bagi segenap unit kerja dalam melaksanakan kerangka kerja manajemen risiko operasional yang telah ditetapkan oleh Bank.

Strategi Manajemen Risiko Operasional dirumuskan sesuai strategi dan tujuan bisnis secara keseluruhan dengan memperhatikan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*).

Tata kelola manajemen risiko operasional diimplementasikan berdasarkan konsep *Three Lines Model* yang membedakan antara Satuan Kerja Operasional (*Risk Taking Unit*) yang merupakan *Risk and Control Owner*, Satuan Kerja Manajemen Risiko yang independen, dan Satuan Kerja Audit Intern. Fungsi *Risk Taking Unit* dijalankan oleh Satuan Kerja Operasional dan spesifik untuk konteks risiko operasional bermitra dengan Senior Operational Risk Executive (SORX) dalam memitigasi risiko yang dihadapi. Satuan Kerja Manajemen Risiko bersama dengan Satuan Kerja Kepatuhan bertugas memantau risiko dan menyediakan kebijakan/ prosedur terkait manajemen risiko untuk meminimalisir risiko , serta me-*review* produk bank baru. Satuan Kerja Audit Intern bertugas memastikan efektivitas pengelolaan risiko dan pengendalian intern.

Dalam menerapkan manajemen risiko operasional, Bank perlu diperlengkapi dengan *tools* dan metodologi. *Tools* dan metodologi yang diterapkan dalam manajemen risiko operasional antara lain:

1) *Escalation*
   Merupakan proses penyampaian setiap kejadian risiko operasional signifikan kepada Direksi dengan tujuan informasi dan kejadian dapat tersampaikan dan diselesaikan dengan cepat dan tepat.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

n. Operational risk

In order to implement operational risk management, BNI made reference to Bank Indonesia or Financial Authority Regulations, and also International Best Practices. BNI also has operational risk management procedures that are prepared and evaluated periodically as guidelines for all units in implementing the operational risk management framework that has been established by the Bank.

The Operational Risk Management Strategy is formulated according to the overall business strategy and objectives by taking into account the level of risk to be taken (risk appetite) and risk tolerance.

Operational risk management governance is implemented based on the Three Lines Model concept which differentiates between Risk Taking Units (RTU) that have the role as Risk and Control Owner, Risk Management Units that are independent to RTU, and Internal Audit that independent to RTU and Risk Management Unit. The Risk Taking Unit functions are carried out by the Operation Units and together with the Senior Operational Risk Executive (SORX) mitigating the potential operational risks. Risk Management Units and Compliance Unit are monitoring risks and providing policies/ procedures related to risk management to minimise risks, and reviewing new bank products. Internal Audit is ensuring the effectiveness of risk management and internal control.

In order to implement operational risk management, Banks also need to be equipped with tools and methodologies. Tools applied in operational risk management include:

1) *Escalation*
   It is the process of reporting every significant operational risk event to the Board of Directors with the aim that information and events can be reported and resolved quickly and precisely.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

n. Risiko operasional (lanjutan)

Dalam menerapkan manajemen risiko operasional, Bank perlu diperlengkapi dengan *tools* dan metodologi. *Tools* dan metodologi yang diterapkan dalam manajemen risiko operasional antara lain: (lanjutan)

2) *Capital*
Modal Minimum Risiko Operasional dan ATMR untuk Risiko Operasional dipergunakan sebagai salah satu elemen dalam menghitung besarnya perhitungan kecukupan modal (*Capital Adequacy Ratio*). Metode perhitungan ATMR untuk Risiko Operasional mengacu pada regulasi dari Otoritas Jasa Keuangan yang berlaku dengan menggunakan pendekatan standar.

3) *ICAAP (Internal Capital Adequacy Assessment Process)*
Proses yang dilakukan Bank untuk menetapkan kecukupan modal sesuai dengan profil risiko Bank dan penetapan strategi untuk memelihara tingkat permodalan.

4) *Risk Control Self-Assessment* (RCSA)*/ Process, Risk, Control, & Monitoring* (PRCM)
RCSA merupakan sebuah proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko yang dilakukan secara periodik secara *self-assessment* oleh segenap unit kerja, yang bertujuan untuk mengevaluasi potensi kelemahan kontrol yang ada sehingga risiko dapat terjadi.
PRCM merupakan sebuah pendekatan atau kerangka berpikir dalam memetakan *key process, key risk, key control*, dan *monitoring* yang menjadi sebuah dasar aktivitas RCSA dapat diimplementasikan.

5) *Operational Risk Event (ORE) Management*
Merupakan sebuah proses untuk mengidentifikasi sebuah kejadian risiko operasional, mencatat, melaporkan, serta menganalisis kejadian yang ada sebagai suatu sarana untuk menyusun tindak lanjut yang diperlukan sebagai tindakan preventif kedepannya maupun tindakan remediasi yang diperlukan.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

n. Operational risk *(continued)*

In order to implement operational risk management, Banks also need to be equipped with tools and methodologies. Tools applied in operational risk management include: (continued)

2) *Capital*
Minimum Operational Risk Capital and RWA for Operational Risk are used as one of the elements in calculating the capital adequacy ratio (Capital Adequacy Ratio). The RWA calculation method for Operational Risk refers to applicable regulations from the Financial Services Authority using standard approach method.

3) *ICAAP (Internal Capital Adequacy Assessment Process)*
The process carried out by the Bank to determine capital adequacy in accordance with the Bank's risk profile and determining strategies to maintain capital levels.

4) *RCSA (Risk Control Self-Assessment) / PRCM (Process, Risk, Control, & Monitoring)*
RCSA is a process of identifying, measuring, monitoring and controlling risks that is carried out periodically through self-assessment by the RTU, which aims to evaluate potential weaknesses in the existing controls so that risks may occur.
PRCM is an approach or framework for mapping key processes, key risks, key control and monitoring on which RCSA activities can be implemented.

5) *Operational Risk Event Management (ORE)*
It is a process for identifying an operational risk event, recording, reporting and analyzing existing events as a means of preparing the necessary follow-up actions as future preventive actions and necessary remediation actions.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

n. Risiko operasional (lanjutan)

Dalam menerapkan manajemen risiko operasional, Bank perlu diperlengkapi dengan *tools* dan metodologi. *Tools* dan metodologi yang diterapkan dalam manajemen risiko operasional antara lain: (lanjutan)

6) Control Improvement Plan (CIP)
Merupakan mekanisme untuk mengidentifikasi, menetapkan, dan memantau perbaikan kontrol dalam suatu proses bisnis yang dapat bersumber dari hasil aktivitas RCSA, tindak lanjut kejadian risiko operasional, arahan manajemen, hasil diskusi rutin unit kerja, dan lain-lain. Hal ini bertujuan agar perbaikan dan peningkatan kontrol dilakukan secara berkelanjutan serta merupakan cerminan dari budaya risiko yang kuat.

7) Lesson Learned
Merupakan penyusunan kajian mendalam atas kejadian risiko operasional yang bersifat material dengan tujuan agar pelajaran dapat dipetik dan tindak lanjut dapat dirumuskan agar kejadian yang sama tidak akan terjadi lagi.

8) Reporting
Pelaporan risiko operasional merupakan media komunikasi dan informasi perihal pengendalian risiko operasional kepada manajemen sebagai pertimbangan dalam pengambilan keputusan strategis.

9) Risk Taxonomy
Bank menetapkan taksonomi risiko sebagai suatu acuan dalam pemetaan semua perangkat kerja yang ada sehingga identifikasi menjadi lebih granular dan tindak lanjut yang diambil dapat menjadi lebih berfokus.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

n. Operational risk *(continued)*

In order to implement operational risk management, Banks also need to be equipped with tools and methodologies. Tools applied in operational risk management include: (continued)

6) Control Improvement Plan (CIP)
It is a mechanism for identifying, establishing and monitoring control improvements in a business process which can be sourced from the results of RCSA activities, as follow-up to operational risk incidents, management direction, results of routine RTU discussions, etc. This CIP also aimed to ensure that control improvements and enhancements are carried out on an ongoing basis and as a reflection of a strong risk culture.

7) Lessons Learned
It is the preparation of an in-depth study of material operational risk events with the aim that lessons can be learned and follow-up actions can be formulated so that the same incident will not happen again.

8) Reporting
Operational risk reporting is a media for communication and information regarding operational risk control to management as a consideration in making strategic decisions.

9) Risk Taxonomy
The Bank has set a risk taxonomy as a reference in mapping all existing work tools so that identification becomes more granular and follow-up actions taken can be more focused.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

n. Risiko operasional (lanjutan)

Kerangka kerja manajemen risiko operasional dapat berjalan dengan baik apabila ditopang oleh pondasi yang kuat dalam bentuk beberapa aspek utama sebagai berikut:

1) *Organization and Technology*
   Dalam menjalankan manajemen risiko operasional diperlukan dukungan organisasi yang memiliki gambaran jelas terkait tugas dan tanggung jawab yang dipahami secara utuh oleh semua unit kerja. *Check & Balance* terjadi dalam organisasi sehingga proses manajemen risiko operasional dapat berjalan sesuai dengan yang direncanakan.
   Penggunaan dan penerapan teknologi informasi dapat mendukung proses manajemen risiko operasional dimana dengan kompleksitas bank, otomasi proses dan otomasi proses kontrol akan dapat memaksimalkan upaya mitigasi risiko. Serta adanya data yang terintegrasi untuk risiko operasional dapat menghasilkan informasi yang lengkap dan akurat yang dapat digunakan dalam pengelolaan risiko operasional serta sebagai data pendukung dalam pengambilan keputusan oleh manajemen.
2) *Risk Culture, Conduct, and Cultural Mindset*
   Pondasi yang terpenting dan fundamental adalah budaya risiko yang kuat, perilaku pegawai yang sesuai atas *risk & control*, dan *mindset* yang tepat atas manajemen risiko. Dengan terpenuhinya aspek ini, maka proses manajemen risiko dapat berjalan dengan efektif dimana garda terdepan yang berhadapan dengan risiko dapat secara optimal memitigasi risiko dan hal ini juga akan dilengkapi oleh metodologi lainnya sehingga upaya manajemen risiko dapat bermanfaat secara maksimal.

Terkait dengan kelangsungan usaha bila terjadi kondisi *disaster* (bencana), BNI juga sudah mempunyai prosedur *Business Continuity Management* (BCM), yaitu suatu mekanisme formal yang merupakan kombinasi antara strategi, prosedur, dan organisasi yang dikembangkan untuk memastikan kelangsungan operasional dari fungsi-fungsi usaha yang kritikal pada tingkat layanan tertentu pada saat terjadi gangguan atau bencana. Prosedur ini mencakup semua unit usaha yang ada di BNI, baik di dalam negeri maupun di luar negeri.

BNI memiliki infrastruktur yang dibutuhkan dalam implementasi BCM seperti *Data Center* (DC), *Disaster Recovery Center* (DRC), dan Lokasi Alternatif Gedung BCM.

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

n. Operational risk *(continued)*

The operational risk management framework can run well if it is supported by a strong foundation in the form of several main aspects as follows:

1) Organization and Technology
   To implement operational risk management, requires organizational support that has a clear picture of duties and responsibilities that are fully understood by units. Check & Balance occurs within the organization so that the operational risk management process can run as planned.

   The use and application of information technology can support operational risk management processes, where with bank complexity, process automation and control process automation are expected to be able to maximise risk mitigation efforts. And the existence of integrated data for operational risks can produce complete and accurate information that can be used in managing operational risks and as supporting data in decision making by management.

2) Risk Culture, Conduct, and Cultural Mindset
   The most important and fundamental foundation is a strong risk culture, appropriate employee behavior regarding risk & control, and the right mindset for risk management. By fulfilling this aspect, the risk management process can run effectively, where the front guard dealing with risk can optimally mitigate risk and this will also be complemented by other methodologies so that risk management efforts can be maximally beneficial.

Regarding the business resilience when disaster occurs, BNI has Business Continuity Management (BCM) procedures, which is a formal mechanism which combined strategies, procedures and organizations developed to ensure operational continuity of critical functions under certain levels of services when a disturbance or disaster is encountered. This procedures is applied for all business units in BNI for both domestic and overseas.

BNI has the infrastructure needed to implement BCM such as Data Center (DC), Disaster Recovery Center (DRC), and BCM Alternative Building.

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

o. Manajemen modal

Pada tanggal 31 Desember 2024 dan 2023, Bank telah memenuhi semua persyaratan modal yang diwajibkan.

Rasio Liabilitas Penyediaan Modal Minimum

Rasio Liabilitas Penyediaan Modal Minimum (*Capital Adequacy Ratio* (CAR)) adalah rasio modal terhadap aset tertimbang menurut risiko (*Risk - Weighted Assets* (RWA)). Berdasarkan peraturan Bank Indonesia, jumlah modal untuk risiko kredit terdiri dari Modal Inti ("Tier I") dan Modal Pelengkap ("Tier II") dikurangi penyertaan pada Entitas Anak. Sesuai dengan Peraturan OJK No. 11/POJK.03/2016, Peraturan OJK No. 34/POJK.03/2016, dan Peraturan OJK No. 27 Tahun 2022 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dan Surat Edaran OJK No.9/SEOJK.03/2020 tentang Transparansi dan Publikasi Laporan Bank Umum Konvensional, sejak akhir bulan September 2016, Cadangan Tujuan tidak dapat lagi diperhitungkan sebagai komponen Modal Bank.

Rasio Kecukupan Modal (hanya BNI) pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut:

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

o. Capital management

As of 31 December 2024 and 2023, the Bank has complied with all capital requirements.

Capital Adequacy Ratio

The Capital Adequacy Ratio (CAR) is the ratio of the Bank's capital over its Risk - Weighted Assets (RWA). Based on Bank Indonesia regulations, the total capital for credit risk consists of core capital (Tier I) and supplementary capital (Tier II) less investments in Subsidiaries. In accordance with OJK Regulation No. 11/POJK.03/2016, OJK Regulation No. 34/POJK.03/2016, OJK Regulation No. 27 of 2022 concerning the Minimum Capital Requirement for Commercial Banks and OJK Circular Letter No.9/SEOJK.03/2020 on Transparency and Publication Conventional Commercial Bank Report, since the end of the month of September 2016, Specific Reserves can no longer be taken into account as a component of Bank's Capital.

The Capital Adequacy Ratio of BNI (BNI only) as of 31 December 2024 and 2023 is as follows:

	2024	2023	
BNI - tanpa memperhitungkan risiko pasar			***BNI - without considering market risk***
Aset Tertimbang Menurut Risiko	660,200,271	609,160,539	*Risk Weighted Assets*
Total Modal	152,307,417	142,016,389	*Total Capital*
Rasio Liabilitas Penyediaan Modal Minimum BNI	23.07%	23.31%	*Capital Adequacy Ratio*
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Otoritas Jasa Keuangan	9.80%	9.80%	*Minimum Capital Adequacy Ratio required by Financial Service Authority*
BNI - dengan memperhitungkan risiko pasar dan kredit			***BNI - considering market and credit risks***
Aset Tertimbang Menurut Risiko	674,362,768	611,972,160	*Risk Weighted Assets*
Total Modal	152,307,417	142,016,389	*Total Capital*
Rasio Liabilitas Penyediaan Modal Minimum BNI	22.59%	23.21%	*Capital Adequacy Ratio*
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Otoritas Jasa Keuangan	9.80%	9.80%	*Minimum Capital Adequacy Ratio required by Financial Service Authority*

59. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI INDONESIA (lanjutan)

Informasi tambahan berikut yang disajikan dibawah ini merupakan informasi yang disyaratkan oleh regulasi yang berlaku dan bukan/tidak merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Indonesia: (lanjutan)

o. Manajemen modal (lanjutan)

Rasio Liabilitas Penyediaan Modal Minimum (lanjutan)

Rasio Kecukupan Modal (hanya BNI) pada tanggal-tanggal 31 Desember 2024 dan 2023 adalah sebagai berikut: (lanjutan)

59. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by applicable regulations and is not information required by Indonesian Accounting Standards: (continued)

o. Capital management *(continued)*

Capital Adequacy Ratio (continued)

The Capital Adequacy Ratio of BNI (BNI only) as of 31 December 2024 and 2023 is as follows: (continued)

	2024	2023	
BNI - dengan memperhitungkan risiko operasional, mulai berlaku sejak 1 Januari 2010			***BNI - considering operational risk, effective since 1 January 2010***
Aset Tertimbang Menurut Risiko	711,773,633	646,939,036	*Risk Weighted Assets*
Total Modal	152,307,417	142,016,389	*Total Capital*
Rasio Liabilitas Penyediaan Modal Minimum BNI	21.40%	21.95%	*Capital Adequacy Ratio*
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Otoritas Jasa Keuangan	9.80%	9.80%	*Minimum Capital Adequacy Ratio required by Financial Service Authority*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN POSISI KEUANGAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
ASET			***ASSETS***
Kas	13,616,467	11,123,073	*Cash*
Giro pada Bank Indonesia	50,993,488	64,306,677	*Current accounts with Bank Indonesia*
Giro pada bank lain	21,826,713	34,799,576	*Current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(6)	(2)	*Less: Allowance for impairment losses*
	21,826,707	34,799,574	
Penempatan pada bank lain dan Bank Indonesia	13,173,121	40,778,538	*Placements with other banks and Bank Indonesia*
Dikurangi: Cadangan kerugian penurunan nilai	(6)	(1)	*Less: Allowance for impairment losses*
	13,173,115	40,778,537	
Efek-efek	40,837,596	27,178,454	*Marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai	(270)	(242,941)	*Less: Allowance for impairment losses*
	40,837,326	26,935,513	
Efek-efek yang dibeli dengan janji dijual kembali	7,281,260	9,948,586	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	13,295,854	19,277,495	*Bills and other receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(52,828)	(278,501)	*Less: Allowance for impairment losses*
	13,243,026	18,998,994	
Tagihan akseptasi	16,002,813	17,544,789	*Acceptance receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(93,171)	(477,362)	*Less: Allowance for impairment losses*
	15,909,642	17,067,427	
Tagihan derivatif	1,792,978	995,677	*Derivative receivables*
Pinjaman yang diberikan	761,550,303	687,912,534	*Loans*
Dikurangi: Cadangan kerugian penurunan nilai	(38,328,597)	(46,925,323)	*Less: Allowance for impairment losses*
	723,221,706	640,987,211	
Obligasi Pemerintah setelah penyesuaian amortisasi diskonto dan premi	112,491,067	113,494,401	*Government Bonds adjusted for amortization of discount and premium*
Dikurangi: Cadangan kerugian penurunan nilai	(2,988)	(1,504)	*Less: Allowance for impairment losses*
	112,488,079	113,492,897	
Pajak dibayar di muka	-	626,869	*Prepaid taxes*
Beban dibayar di muka	2,805,977	2,668,856	*Prepaid expenses*
Investasi pada entitas asosiasi	12,748,127	11,283,466	*Investment in associates*
Penyertaan saham - bersih	5,952,954	5,937,637	*Equity investments - net*
Aset lain-lain - bersih	12,198,918	14,586,449	*Other assets - net*
Aset tetap	47,342,360	43,260,975	*Fixed assets*
Dikurangi: Akumulasi penyusutan	(17,793,691)	(16,349,491)	*Less: Accumulated depreciation*
	29,548,669	26,911,484	
Aset pajak tangguhan - bersih	6,786,150	7,276,800	*Deferred tax assets - net*
TOTAL ASET	**1,084,424,589**	**1,048,725,727**	***TOTAL ASSETS***

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN POSISI KEUANGAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
LIABILITAS DAN EKUITAS			***LIABILITIES AND EQUITY***
LIABILITAS			***LIABILITIES***
Liabilitas segera	5,486,691	5,149,449	*Obligations due immediately*
Simpanan nasabah	792,672,134	801,708,861	*Deposits from customers*
Simpanan dari bank lain	18,513,894	11,846,032	*Deposits from other banks*
Liabilitas derivatif	1,479,185	810,462	*Derivative payables*
Efek-efek yang dijual dengan janji dibeli kembali	15,890,945	6,891,177	*Securities sold under agreements to repurchase*
Liabilitas akseptasi	4,213,527	5,724,660	*Acceptance payables*
Beban yang masih harus dibayar	1,264,319	1,463,839	*Accrued expenses*
Utang pajak			*Taxes payable*
- Pajak penghasilan badan	202,599	679,669	*Corporate income tax* -
- Pajak lainnya	84,312	101,409	*Other taxes* -
Total utang pajak	286,911	781,078	*Total taxes payable*
Imbalan kerja	6,877,242	6,728,829	*Employee benefits*
Penyisihan	2,283,222	2,172,732	*Provision*
Liabilitas lain-lain	7,023,812	7,671,839	*Other liabilities*
Efek-efek yang diterbitkan	13,045,283	4,998,280	*Securities issued*
Pinjaman yang diterima	39,586,461	29,919,191	*Borrowings*
Efek-efek subordinasi	17,699,183	16,928,731	*Subordinated securities*
TOTAL LIABILITAS	**926,322,809**	**902,795,160**	***TOTAL LIABILITIES***

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN POSISI KEUANGAN
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
EKUITAS			***EQUITY***
Modal saham:			*Share capital:*
- Seri A Dwiwarna - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)			*Class A Dwiwarna - Rp3,750 par value per share (in full Rupiah amount)* -
- Seri B - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)			*Class B – Rp3,750 par value per share (in full Rupiah amount)* -
- Seri C - nilai nominal Rp187,5 per saham (dalam Rupiah penuh)			*Class C – Rp187.5 par value per share (in full Rupiah amount)* -
Modal dasar:			*Share capital - Authorised:*
- Seri A Dwiwarna - 1 saham			*Class A Dwiwarna - 1 share* -
- Seri B – 578.683.733 saham			*Class B – 578,683,733 shares* -
- Seri C – 68.426.325.320 saham			*Class C – 68,426,325,320 shares* -
Modal ditempatkan dan disetor penuh:			*Issued and fully paid:*
- Seri A Dwiwarna - 1 saham			*Class A Dwiwarna - 1 share* -
- Seri B – 578.683.733 saham			*Class B – 578,683,733 shares* -
- Seri C – 36.678.114.582 saham	9,054,807	9,054,807	*Class C – 36,678,114,582 shares* -
Tambahan modal disetor	19,633,584	19,633,584	*Additional paid-in capital*
Cadangan pembayaran berbasis saham	322,589	260,116	*Share-based payment reserve*
Cadangan revaluasi aset	16,646,723	15,383,157	*Asset revaluation reserve*
Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah dalam kelompok tersedia untuk dijual, setelah pajak	(1,426,665)	(959,372)	*Unrealised loss on available-for-sale marketable securities and Government Bonds, net of tax*
Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing	(97,232)	(58,923)	*Exchange difference in translation of foreign currency financial statements*
Saldo laba			*Retained earnings*
Sudah ditentukan penggunaannya			*Appropriated*
Cadangan umum dan wajib	2,778,412	2,778,412	*General and legal reserves*
Cadangan khusus	-	-	*Specific reserves*
Tidak ditentukan penggunaannya	111,189,562	100,018,746	*Unappropriated*
	113,967,974	102,797,158	
Saham treasuri	-	(179,960)	*Treasury shares*
TOTAL EKUITAS	**158,101,780**	**145,930,567**	***TOTAL EQUITY***
TOTAL LIABILITAS DAN EKUITAS	**1,084,424,589**	**1,048,725,727**	***TOTAL LIABILITIES AND EQUITY***

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
PENDAPATAN BUNGA	64,923,225	60,520,375	***INTEREST INCOME***
BEBAN BUNGA	(25,435,146)	(19,850,706)	***INTEREST EXPENSE***
PENDAPATAN BUNGA - BERSIH	**39,488,079**	**40,669,669**	***INTEREST INCOME - NET***
PENDAPATAN OPERASIONAL LAINNYA			***OTHER OPERATING INCOME***
Provisi dan komisi lainnya	10,551,324	10,445,335	*Other fee and commission*
Laba dari entitas asosiasi	1,629,349	1,326,932	*Income from investment in associates*
Penerimaan kembali aset yang telah dihapusbukukan	6,025,183	5,029,766	*Recovery of assets written off*
Keuntungan yang belum direalisasi dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui laba rugi	121,796	63,732	*Unrealised gain on changes in fair value of financial assets at fair through profit or loss*
Keuntungan dari penjualan aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan nilai wajar melalui laba rugi	1,737,167	1,153,663	*Gain on sale of financial assets at fair value through comprehensive income and fair value through profit or loss*
Laba selisih kurs - bersih	1,261,260	1,019,260	*Foreign exchange gains - net*
Lain-lain	491,696	442,674	*Others*
TOTAL PENDAPATAN OPERASIONAL LAINNYA	**21,817,775**	**19,481,362**	***TOTAL OTHER OPERATING INCOME***
PEMBENTUKAN CADANGAN KERUGIAN PENURUNAN NILAI	**(7,980,678)**	**(9,070,912)**	***ALLOWANCE FOR IMPAIRMENT LOSSES***
BEBAN OPERASIONAL LAINNYA			***OTHER OPERATING EXPENSES***
Gaji dan tunjangan	(12,859,782)	(11,891,511)	*Salaries and employees' benefits*
Umum dan administrasi	(8,313,035)	(8,501,261)	*General and administrative*
Beban promosi	(1,048,227)	(996,481)	*Promotion expense*
Premi penjaminan	(1,567,476)	(1,476,244)	*Guarantee premium*
Lain-lain	(3,557,167)	(2,937,787)	*Others*
TOTAL BEBAN OPERASIONAL LAINNYA	**(27,345,687)**	**(25,803,284)**	***TOTAL OPERATING EXPENSES***
LABA OPERASIONAL	**25,979,489**	**25,276,835**	***OPERATING INCOME***
PENDAPATAN/(BEBAN) BUKAN OPERASIONAL - BERSIH	**85,290**	**(21,236)**	***NON-OPERATING INCOME/(EXPENSES) - NET***
LABA SEBELUM BEBAN PAJAK	**26,064,779**	**25,255,599**	***INCOME BEFORE TAX EXPENSE***
BEBAN PAJAK			***TAX EXPENSE***
Kini	(4,447,711)	(4,386,618)	*Current*
Tangguhan	(410,731)	(84,783)	*Deferred*
TOTAL BEBAN PAJAK	(4,858,442)	(4,471,401)	***TOTAL TAX EXPENSE***
LABA TAHUN BERJALAN	**21,206,337**	**20,784,198**	***INCOME FOR THE YEAR***

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
LABA TAHUN BERJALAN	**21,206,337**	**20,784,198**	***INCOME FOR THE YEAR***
PENGHASILAN KOMPREHENSIF LAIN:			***OTHER COMPREHENSIVE INCOME:***
Pos-pos yang tidak akan direklasifikasi ke laba rugi			***Items that will not be reclassified to profit or loss***
Keuntungan revaluasi aset tetap	1,263,566	-	*Gain on revaluation of fixed assets*
Pengukuran kembali liabilitas imbalan kerja	517,551	(504,986)	*Remeasurement of post employment benefit*
Pajak penghasilan terkait dengan komponen pendapatan komprehensif lain	(98,335)	95,945	*Income tax relating to components of other comprehensive income*
Pos-pos yang akan direklasifikasi ke laba rugi			***Items that will be reclassified to profit or loss***
Penyesuaian akibat penjabaran laporan keuangan dalam mata uang asing	(38,309)	(21,764)	*Translation adjustment of foreign currency financial statements*
Keuntungan/(kerugian) dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain	(576,904)	1,380,217	*Gain/(losses) on changes in fair value of financial assets at fair value through other comprehensive income*
Pajak penghasilan terkait dengan komponen pendapatan komprehensif lain	109,612	(335,688)	*Income tax relating to components of other comprehensive income*
LABA/(RUGI) KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK	**1,177,181**	**613,724**	***OTHER COMPREHENSIVE GAIN/(LOSS) FOR THE YEAR AFTER TAXES***
TOTAL LABA KOMPREHENSIF TAHUN BERJALAN	**22,383,518**	**21,397,922**	***TOTAL COMPREHENSIVE INCOME FOR THE YEAR***

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN PERUBAHAN EKUITAS UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CHANGES IN EQUITY FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Rugi yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealised losses on marketable securities and Government Bonds, at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference from translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan kompensasi berbasis saham/ *Share-based compensation reserve*	Total ekuitas/ *Total equity*	
						Dicadangkan/ *Appropriated*					
						Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated*)*				
Saldo pada tanggal 31 Desember 2023	**9,054,807**	**19,633,584**	**(959,372)**	**(58,923)**	**15,383,157**	**2,778,412**	**100,018,746**	**(179,960)**	**260,116**	**145,930,567**	***Balance as of 31 December 2023***
Laba tahun berjalan	-	-	-	-	-	-	21,625,554	-	-	21,625,554	*Income for the year*
Laba komprehensif lainnya untuk tahun berjalan	-	-	(467,293)	(38,309)	1,263,566	-	-	-	-	757,964	*Other comprehensive income for the year*
Pembagian dividen	-	-	-	-	-	-	(10,454,738)	-	-	(10,454,738)	*Distribution of dividends*
Saham treasuri	-	-	-	-	-	-	-	179,960	-	179,960	*Treasury shares*
Cadangan pembayaran berbasis saham	-	-	-	-	-	-	-	-	62,473	62,473	*Share-based payment*
Saldo pada tanggal 31 Desember 2024	**9,054,807**	**19,633,584**	**(1,426,665)**	**(97,232)**	**16,646,723**	**2,778,412**	**111,189,562**	**-**	**322,589**	**158,101,780**	***Balance as of 31 December 2024***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

*) *Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN PERUBAHAN EKUITAS UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CHANGES IN EQUITY FOR THE YEARS ENDED 31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Rugi yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealized losses on marketable securities and Government Bonds, at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference from translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan kompensasi berbasis saham/ *Share-based compensation reserve*	Total ekuitas/ *Total equity*	
						Dicadangkan/ *Appropriated*	Tidak dicadangkan/ *Unappropriated*)*				
						Cadangan umum dan wajib/ *General and legal reserves*					
Saldo pada tanggal 31 Desember 2022	**9,054,807**	**19,633,584**	**(2,003,902)**	**(37,159)**	**15,383,157**	**2,778,412**	**86,968,410**	**-**	**-**	**131,777,309**	***Balance as of 31 December 2022***
Laba tahun berjalan	-	-	-	-	-	-	20,375,157	-	-	20,375,157	*Income for the year*
Laba komprehensif lainnya untuk tahun berjalan	-	-	1,044,530	(21,764)	-	-	-	-	-	1,022,766	*Other comprehensive income for the year*
Pembagian dividen	-	-	-	-	-	-	(7,324,821)	-	-	(7,324,821)	*Distribution of dividends*
Saham treasuri	-	-	-	-	-	-	-	(179,960)	-	(179,960)	*Treasury shares*
Cadangan pembayaran berbasis saham	-	-	-	-	-	-	-	-	260,116	260,116	*Share-based payment*
Saldo pada tanggal 31 Desember 2023	**9,054,807**	**19,633,584**	**(959,372)**	**(58,923)**	**15,383,157**	**2,778,412**	**100,018,746**	**(179,960)**	**260,116**	**145,930,567**	***Balance as of 31 December 2023***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

**) Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN ARUS KAS
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
ARUS KAS DARI AKTIVITAS OPERASI			***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan pendapatan bunga	64,637,509	59,996,938	*Receipts from interest income*
Pembayaran beban bunga	(25,435,146)	(19,602,509)	*Payments of interest expense*
Pendapatan operasional lainnya	24,866,571	18,016,066	*Other operating income*
Beban operasional lainnya	(26,671,306)	(27,619,639)	*Other operating expenses*
Pendapatan (beban) bukan operasional - bersih	85,290	(21,236)	*Non-operating income (expense) - net*
Pembayaran pajak penghasilan	(4,297,912)	(5,077,826)	*Payment of income tax*
Arus kas sebelum perubahan dalam aset dan liabilitas operasi	**33,185,006**	**25,691,794**	***Cash flows before changes in operating assets and liabilities***
Perubahan dalam aset dan liabilitas operasi:			***Changes in operating assets and liabilities:***
(Kenaikan)/penurunan aset operasi:			*(Increase)/decrease in operating assets:*
Penempatan pada Bank Indonesia dan bank lain	(324,265)	(120,097)	*Placements with Bank Indonesia and other banks*
Efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui laporan laba rugi	(15,388,114)	(333,239)	*Marketable securities and Government Bonds at fair value through profit or loss*
Efek-efek yang dibeli dengan janji dijual kembali	2,667,326	1,446,686	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	5,981,641	1,624,634	*Bills and other receivables*
Pinjaman yang diberikan	(92,306,852)	(59,673,241)	*Loans*
Tagihan akseptasi	1,541,976	2,425,696	*Acceptance receivables*
Biaya dibayar di muka	(137,121)	523,435	*Prepaid expenses*
Penempatan *term deposit* valas devisa hasil ekspor	1,631,137	(2,540,505)	*Foreign exchange term deposit from export activities*
Aset lain-lain	1,106,157	373,977	*Other assets*
(Penurunan)/kenaikan liabilitas operasi:			*(Decrease)/increase in operating liabilities:*
Liabilitas segera	337,242	463,089	*Obligations due immediately*
Simpanan nasabah	(9,036,727)	38,914,259	*Deposits from customers*
Simpanan dari bank lain	6,667,862	(3,321,556)	*Deposits from other banks*
Beban yang masih harus dibayar	(199,520)	224,262	*Accrued expenses*
Imbalan kerja	(557,192)	733,456	*Employee benefits*
Liabilitas akseptasi	(1,511,133)	467,160	*Acceptance payables*
Utang pajak	(17,097)	(48,402)	*Taxes payable*
Kewajiban atas penempatan *term deposit* valas devisa hasil ekspor	(1,631,137)	2,540,505	*Liabilites related to foreign exchange term deposit from export activities*
Liabilitas lain-lain	1,673,893	(93,483)	*Other liabilities*
Kas bersih (digunakan untuk)/ diperoleh dari aktivitas operasi	**(66,316,918)**	**9,298,430**	***Net cash (used in)/ provided from operating activities***
ARUS KAS DARI AKTIVITAS INVESTASI			***CASH FLOWS FROM INVESTING ACTIVITIES***
Penjualan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	92,241,948	53,505,429	*Proceed of marketable securities measured at fair value through other comprehensive income and amortised cost*
Pembelian efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	(93,951,947)	(56,048,294)	*Placement of marketable securities measured at fair value through other comprehensive income and amortised cost*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN ARUS KAS
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2024 DAN 2023
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2024 AND 2023
(Expressed in millions of Rupiah, unless otherwise stated)

	2024	2023	
ARUS KAS DARI AKTIVITAS INVESTASI (lanjutan)			***CASH FLOWS FROM INVESTING ACTIVITIES*** *(continued)*
Penjualan dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	118,012,386	49,685,651	*Proceed from Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	(114,537,958)	(54,264,953)	*Placement of Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian aset tetap	(2,522,674)	(2,129,821)	*Acquisition of fixed assets*
Hasil penjualan aset tetap	2,343	3,298	*Proceeds from sale of fixed assets*
Penyertaan pada Entitas Anak	-	(800,000)	*Capital injection in Subsidiary*
Kas bersih digunakan untuk aktivitas investasi	**(755,902)**	**(10,048,690)**	***Net cash used in investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN			***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerimaan pinjaman yang diterima	26,387,881	15,162,991	*Receipt from borrowings*
Pembayaran pinjaman yang diterima	(16,277,534)	(20,455,830)	*Borrowings payment*
Penerimaan efek-efek yang dijual dengan janji dibeli kembali	9,351,740	6,382,251	*Proceed in securities sold under agreements to repurchase*
Pembayaran efek-efek yang dijual dengan janji dibeli kembali	(920,846)	(2,370,705)	*Payment of securities sold under agreements to repurchase*
Penerimaan efek-efek yang diterbitkan	8,187,500	-	*Receipt in securities issued*
Saham tresuri	-	(179,960)	*Treasury Shares*
Pembayaran liabilitas sewa	(891,782)	(211,769)	*Payment of lease liability*
Pembayaran dividen	(10,454,738)	(7,324,821)	*Payment of dividends*
Kas bersih diperoleh dari/ (digunakan untuk) aktivitas pendanaan	**15,382,221**	**(8,997,843)**	***Net cash provided from/ (used in) financing activities***
PENURUNAN BERSIH KAS DAN SETARA KAS	**(51,690,599)**	**(9,748,103)**	***NET DECREASE IN CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN	**150,884,688**	**160,782,453**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR***
Pengaruh perubahan kurs mata uang asing	(31,741)	(149,662)	*Effect of foreign currency exchange rate changes*
KAS DAN SETARA KAS PADA AKHIR TAHUN	**99,162,348**	**150,884,688**	***CASH AND CASH EQUIVALENTS AT END OF YEAR***

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas adalah sebagai berikut:

Changes in liabilities arising from financing activities in the cash flow statement is as follows:

	1 Januari/ *January* 2024	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember/ *December* 2024	
Pinjaman yang diterima	29,919,191	10,110,347	(443,077)	39,586,461	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	6,891,177	8,430,894	568,874	15,890,945	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	4,998,280	8,187,500	(140,497)	13,045,283	*Securities issued*
Efek-efek subordinasi	16,928,731	-	770,453	17,699,184	*Subordinated securities*
Saham treasuri	(179,960)	-	179,960	-	*Treasury shares*
Pembayaran dividen	-	(10,454,738)	10,454,738	-	*Payment of dividends*
Liabilitas sewa	1,233,958	(891,782)	634,019	976,195	*Lease liabilities*
	59,791,377	**15,382,221**	**12,024,470**	**87,198,068**	

	1 Januari/ *January* 2023	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember/ *December* 2023	
Pinjaman yang diterima	35,158,141	(5,292,840)	53,890	29,919,191	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	2,885,286	4,011,546	(5,655)	6,891,177	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	4,997,198	-	1,082	4,998,280	*Securities issued*
Efek-efek subordinasi	17,213,150	-	(284,419)	16,928,731	*Subordinated securities*
Pembayaran dividen	-	(7,324,821)	7,324,821	-	*Payment of dividends*
Saham treasuri	-	(179,960)	-	(179,960)	*Treasury shares*
Liabilitas sewa	1,082,863	(211,769)	362,864	1,233,958	*Lease liabilities*
	61,336,638	**(8,997,844)**	**7,452,583**	**59,791,377**	

1. Ikhtisar kebijakan akuntansi yang penting

Dasar penyusunan laporan keuangan tersendiri entitas induk.

Laporan keuangan tersendiri entitas induk disusun sesuai dengan Pernyataan Standar Akuntansi Keuangan ("PSAK") 227, "Laporan Keuangan Tersendiri".

PSAK 227 mengatur dalam hal entitas menyajikan laporan keuangan tersendiri maka laporan tersebut hanya dapat disajikan sebagai informasi tambahan dalam laporan keuangan konsolidasian. Laporan keuangan tersendiri adalah laporan yang disajikan oleh entitas induk yang mencatat investasi pada entitas anak, entitas asosiasi, dan pengendalian bersama entitas berdasarkan kepemilikan ekuitas langsung bukan berdasarkan pelaporan hasil dan aset bersih *investee*.

Kebijakan akuntansi yang diterapkan dalam penyusunan laporan keuangan tersendiri entitas induk adalah sama dengan kebijakan akuntansi yang diterapkan dalam penyusunan laporan keuangan konsolidasian sebagaimana diungkapkan pada Catatan 2 atas laporan keuangan konsolidasian, kecuali untuk penyertaan pada Entitas Anak yang disajikan pada biaya perolehan.

1. Summary of significant accounting policies

Basis of preparation of the separate financial statements of the parent entity.

The separate financial statements of the parent entity are prepared in accordance with the statement of Financial Accounting Standards ("SFAS") 227, "Separate Financial Statements".

SFAS 227 regulates that when an entity presents the separate financial statements, such financial statements should be presented as supplementary information to the consolidated financial statements. Separate financial statements are those presented by a parent entity, in which the investments of subsidiaries, associated entities and jointly controlled entities are accounted for on the basis of the direct equity interest rather than on the basis of the reported results and net assets of the investees.

Accounting policies adopted in the preparation of the parent entity separate financial statements are the same as the accounting policies adopted in the preparation of the consolidated financial statements as disclosed in Note 2 to the consolidated financial statements, except for investments in Subsidiaries which are stated at cost.

2. Penyertaan Saham

Informasi mengenai Entitas Anak yang dimiliki Bank diungkapkan pada Catatan 1j atas laporan keuangan konsolidasian.

2. Equity Investment

Information pertaining to Subsidiaries of the Bank is disclosed in Note 1j to the consolidated financial statements.

Attachment To Financial Services Authority Circular Letter No. 9/SEOJK.03/2020: Transparency and Publication of Conventional Commercial Bank Reports

Description	Page
1. General Information	
a. Financial Highlights presents financial information in a comparative format for 2 (two) financial years, or since the Bank begins its business for banks that have been in business for less than 2 (two) years. At the very least, financial highlights covers:	
1) Net interest income;	22-25
2) Operating profit;	
3) Profit before tax;	
4) Net profit;	
5) Total comprehensive profit/loss;	
6) Net income per share;	
7) Total assets;	
8) Total liabilities;	
9) Total equity;	
10) Earning assets;	
11) Third party funds;	
12) Borrowings;	
13) CAR;	
14) Return on Asset (ROA);	
15) Return on Equity (ROE);	
16) Profit margin (profit/loss to income ratio);	
17) Rasio Beban Operating Expenses to Operating Income Ratio (BOPO);	
18) Cost to Income Ratio (CIR);	
19) Percentage of Violation and Exceedance of Legal lending Limit (LLL);	
20) Mandatory Minimum Reserves (GWM) Ratio;	
21) Net Open Position (PDN) Ratio; and	
22) Other information and ratios relevant to the banking industry.	
b. Bank Profile	
Bank profile covers at the very least:	
1) Name of Bank, including if any, change of name, reaon for the change, and effective date of name change in the financial year;	80, 85
2) Access to the Bank, including branch or representative offices, whereby the general public may obtain information on the Issuer or Public Company, comprising of:	80-82
a) Address;	
b) Telephone number;	
c) E-mail address; and	
d) Website address;	
3) Brief profile of the Bank;	84-85
4) Vision and mission of the Bank;	86-87
5) Line(s) of business according to the latest articles of association, business activites performed in the Financial Year, and types of products and/or services provided;	90-93
6) Organization structure of Bank, at the very least to 1 (one) level below the Directors, with names and positions;	96-97

Description	Page
7) Shareholding structure and composition, that is, names of shareholders and percentage of shareownership, including:	168-174
a) Shareholders with a minimum of 5% (five percent) of shares of the Bank;	
b) Members of the Board of Directors and Board of Commissioners that own shares of the Bank;	
c) Public shareholders, that is, shareholders that each held less than 5% (five percent) of shares of the Bank;	
d) information on the majority and controlling shareholder(s) of the Bank, direct or indirect, up to the individual ultimate shareholders, presented in a schematic diagram or chart;	
8) Name of subsidiary entity, associated company or joint venture company where the Bank exercise a joint control with the entity, along with the percentage of shareownership, lines of business, total assets, and operating status of the entity (if any);	176-177
9) For subsidiary entities, include information on address of such subsidiary entities;	178-183
10) Profiles of the Board of Directors and Board of Commissioners, covering at least	100-126
a) Composition of the Board of Directors and the Board of Commissioners, along with the position and brief resume of the respective members thereof;	
b) Names and position according to the duties and responsibilities;	
c) Latest photograph;	
d) Age;	
e) Nationality;	
f) Education background;	
g) Work history, including information on:	
(1) Legal basis of appointment as member of the Board of Directors and Board of Commissioner of the Bank	
(2) Concurrent position(s), as member of the board of directors, board of commissioners, and/or committes and other position (if any); and	
(3) Work history, with period of service thereon, with or without the Bank;	
h) Education and/or training attended by member of the Board of Directors and Board of Commissioners for competence development during the financial year (if any); and	
i) Affiliation with other member of the Board of Directors, Board of Commissioners, or the majority shareholder (if any), disclosing the name of affiliated party.	
11) In the event of changes in the membership composition of the Board of Directors and/or the Board of Commissioners occuring subsequent to the end of the Financial Year and up to the deadline for submission of the annual report of published financial statements and information on financial performance, membership composition of the Board of Directors and/or Board of Commissioners shall be presented both prior and after such change(s);	127-129
12) Brief profiles of executive officers, with structure, position and summary curriculum vitae;	130-155
13) Total headcount, and employee distribution in the Financial Year by education and age; and	156-167
14) Awards and/or certifications in domestic as well as international scope, received by the Bank in the last Financial Year (if any), which covers:	208-216
a) Name of award and/or certification;	
b) Issuing institution or agency; and	
c) Validity period of such award and/or certification (if any).	
2. Information on Financial Performance	
a. Report of the Board of Directors	
Brief description of the Bank performance, at the very least covering:	
1) Strategy and policies of the Bank's management, including for the Sharia Business Unit (UUS) for banks that have an UUS;	58-60
2) Comparison between achievement and targets;	61-62
3) Constraints faced by the Bank;	62-63
4) Overview of business prospects;	67-68
5) Implementation of Bank governance;	68-69
6) Changes in the composition of the Board of Directors and reason for such changes (if any);	72-73
7) Organization structure;	66
8) Primary activities;	66
9) Information Technology;	65
10) Types of products and services, including lending to debtors in the micro-, small- and medium-business sectors;	66
11) Interest rates on deposits and loans;	67
12) Developments in the economy and target market;	67-68

Description	Page
13) Business and partnership networks, domestic and/or overseas;	65-66
14) Number, types and location of offices;	67
15) Ownership by the board of directors, board of commissioners and shareholders in the business group of the Bank;	67
16) Significant changes at the Bank or the Bank's business group in the reporting year;	67
17) Prediction of significant future issues; and	67-68
18) Human resources, covering number of employees as well as education, training, and development programs for human resources.	63-64
b. Report of the Board of Commissioners	
The report of the Board of Commissioners covers at least:	
1) Structure of the Board of Commissioners, with position and summary curriculum vitae;	52-53
2) Assessment of the performance of the Board of Directors in the management of the Bank;	46-47
3) Supervision of the implementation of Bank's strategies;	47
4) Opinion on the business prospects as prepared by the Board of Directors;	48-49
5) Opinion on the implementation of Bank governance;	49
6) Changes in the composition of the Board of Commissioners and reason for such changes (if any); and	52-53
7) Frequency and mechanism for advising members of the Board of Directors;	51
c. Management Discussion & Analysis	
Management discussion and analysis presents an analysis and discussion of financial statements accounts and other important information with an emphasis on material changes that occurred during the Financial Year, which at least includes:	
1) Review of operations by business segment, including for UUS, at least of:	228-281
a. Revenues; and	
b. Profitability;	
2) Review of financial performance, comprising a comparison of the financial performance for the current year wuth the previous year, as well as explanation on the cause of changes and impact of such changes, covering at least:	300-328
a. Investment of funds (investments and disbursement of loan/financing) and total assets;	
b. Third party funds and other sources of funding;	
c. Equity;	
d. Revenues, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss);	
e. Cash flows; and	
f. Prime lending rate;	
3) Analysis of the quality of earning assets and relevant financial ratios;	300, 303, 329-330
4) Capital structure of Bank;	352-353
5) Material information and facts subsequent to the date of accountant report (if any); and	357
6) Marketing aspects of Bank's products, at least on marketing strategy amd market share;	369-370
3. Information on Risk Exposure and Capital	
In the event that the Bank includes the corporate governance report into the Annual Financial Publication Report and Financial Performance Information, the scope and guidelines for such report shall refer to the applicable POJK on implementation of governance for commercial banks.	474-601
4. Governance Information	
In the event that the Bank combines the report on the implementation of governance in the Financial Published Report and Annual Financial Performance Information, the scope and guidelines for filling out refer to the POJK regarding the implementation of governance for commercial banks.	604-1151
5. Sustainability Report	
a. As regulated in the relevant POJK, a Sustainability Report covers the implementation of sustainable financing for financial services institutions, issuers and public companies. In the event that the Bank includes the sustainability report into the Annual Financial Publication Report and Financial Performance Information, the scope and guidelines for such report shall refer to the applicable POJK.	Sustainability Report
b. Report on the implementation of social and environmental responsibility as regulated in the relevant laws and regulations on social and environmental repsonsibility for limited liability companies.	
1) Information on the implementation of social and environmental responsibility covers the management policy, types of programs and costs expended, on aspects of:	
a) environment;	Sustainability Report
b) labor practices;	Sustainability Report
c) sound institutional practices;	Sustainability Report

Description	Page
d) consumer; and	Sustainability Report
e) community development.	Sustainability Report
2) In the event that the Bank presents information on social and environmental responsibility as referred to in point 1) in a separate report such as in a social and environmental responsibility report, the Bank is exempted from disclosing information regarding social and environmental responsibility in the annual report of published financial statements and information on financial performance.	Sustainability Report
6. Annual Financial Statements	
The annual financial statements that have been audited by a Public Accountant and Public Accountant Firm registered with the OJK.	1198-1520
7. Information on the Business Group of the Bank	
a. A Bank that is part of a business group and/or have a Subsidiary, shall additionally report on:	
1) Structure of the Bank business group, covering:	188-189
a) the structure of the business group, comprising of the Bank, Subsidiary Entities, related (sister) companies, Parent Entity, and up to the ultimate shareholder;	
b) the structure of management inter-relationship of entities in the business group; and	
c) any shareholders acting in concert. Shareholders acting in concert refer to individual or institutional shareholders with a common objective of controlling the Bank, with or without a formal agreement;	
2) transactions between the Bank and related parties in the Bank's business group, with consideration of the following:	387-396
a) information on transactions with related parties, whether conducted by Bank or by any entity in the Bank business group in the financial sector;	
b) related parties are parties defined as such in relevant financial accounting standards;	
c) types of transaction with related parties, including:	
(1) cross shareholding;	
(2) transactions by a business group performed in the interest of another business group	
(3) short-term liquidity management in the business group;	
(4) funding provided to, or received by, another entity in a business group;	
(5) exposure to a majority shareholder in the form of, among others, loans, commitments and contingencies; and	
(6) transactions for the purchase, sale and/or rental of assets with another entity in the business group, including transactions with repurchase agreement (repo);	
3) transactions with related parties conducted by each entity in the Bank business group in the financial sector;	387-396
4) the provision of funding, commitments or equivalent facilities from an entity in the Bank business group to the customers and/or parties that already received financing from the Bank; and	397, 1048
5) any prohibition, restriction, and/or other significant constraint to transfer funds or to fulfill the required regulatory capital between the Bank and other entities in a business group;	397
8. Additional Information for Banks that are also an Issuer and/or Public Company	
The Bank that is also an Issuer and/or a Public Company should include in addition the scope of information in accordance with the provisions of OJK Regulation regarding the annual report of issuer or public company.	✔

SEOJK No. 16/SEOJK.04/2021: Annual Report of Public Company

Description			Page
I.	**General Provision**		
1.	In this Financial Services Authority Circular Letter what is meant by:		
	a.	The Annual Report is a report on the Board of Directors and Board of Commissioners accountability in managing and supervising issuers or public companies within a period of 1 (one) fiscal year to the general meeting of shareholders prepared based on the provisions of the Financial Services Authority Regulation concerning the Annual Report of issuers or public companies	✔
	b.	Issuers are parties who make public offerings	✔
	c.	A Public Company is a company whose shares are owned by at least 300 (three hundred) shareholders and has a paid-up capital of at least Rp3,000,000,000.00 (three billion rupiah) or a number of shareholders and paid-up capital as determined by the Financial Services Authority	✔
	d.	A Public Company is an Issuer that has made a public offering of equity securities or a Publically- listed Company	✔
	e.	A Sustainability Report is a report published to the public that contains the economic, financial, social, and environmental performance of a financial service institution, Issuer, and Public Company in running a sustainable business	✔
	f	Board of Directors:	
		1) For an Issuer or a Public Company in the form of a limited liability company, it is the Board of Directors as referred to in the Financial Services Authority Regulation concerning the Board of Directors and Board of Commissioners of an Issuer or Public Company; and	✔
		2) For an Issuer or a Public Company in the form of a legal entity other than a limited liability company, it is the body that carries out the management of the legal entity as referred to in the laws and regulations concerning the legal entity.	✔
	g.	Board of Commissioners:	
		1) For an Issuer or a Public Company in the form of a limited liability company, the Board of Commissioners as referred to in the Financial Services Authority Regulation concerning the Board of Directors and Board of Commissioners of an Issuer or Public Company; and	✔
		2) For the Issuer or Public Company in the form of a legal entity other than a limited liability company, it is the body that supervises the legal entity as referred to in the laws and regulations concerning the legal entity.	✔
	h.	General Meeting of Shareholders hereinafter abbreviated as GMS:	
		1) For an Issuer or a Public Company in the form of a limited liability company, it is the GMS as referred to in the Financial Services Authority Regulation concerning the Planning and Organizing of the General Meeting of Shareholders of a Public Company; and	✔
		2) For an Issuer or Public Company in the form of a legal entity other than a limited liability company, it is the body that has authority that is not given to any other body that carries out management and supervisory functions, within the limits specified in the legislation and/or articles of association governing the legal entity.	✔
2.	The Annual Report of Issuers or Public Companies is an important source of information for investors or shareholders as one of the basic considerations in making investment decisions and a means of supervision of Issuers or Public Companies.		✔
3.	Along with the development of the capital market and the increasing need for information disclosure by investors or shareholders, the Board of Directors and the Board of Commissioners are required to present quality, accurate, and accountable information through the Annual Reports of Issuers or Public Companies.		✔
4.	Annual Reports that are prepared regularly and informatively can provide convenience for investors or shareholders and stakeholders in obtaining the required information.		✔
5	This Financial Services Authority Circular is a guideline for Issuers or Public Companies that must be applied in preparing Annual Reports and Sustainability Reports.		✔
II.	**Format of Annual Report**		
1.	Annual Report should be presented in the printed format and in electronic document copy.		✔
2.	The printed version of the Annual Report should be printed on light-colored paper of fine quality, in A4 size, bound and can be reproduced in good quality.		✔
3.	The Annual Report may present information in the form of pictures, graphs, tables, and/or diagrams by including clear titles and/or descriptions, so that they are easy to read and understand.		✔
4.	The Annual Report presented in electronic document format is the Annual Report converted into pdf format.		✔

Description	Page
III. Content of Annual Report	
1. Annual Report should contain at least the following information:	
a. Summary of key financial information;	22
b. Stock information (if any);	31
c. The Board of Directors report;	57
d. The Board of Commissioners report;	45
e. Profile of Issuer or Public Company;	80
f. Management discussion and analysis;	220
g. Corporate governance applied by the Issuer or Public Company;	604
h. Corporate social and environmental responsibility of the Issuer or Public Company;	
i. Audited annual report; and	1198
j. Statement that the Board of Directors and the Board of Commissioners are fully responsible for the Annual Report;	76-77
2. Description of Content of Annual Report	
a. Summary of Key Financial Information	
Summary of Key Financial Information contains financial information presented in comparison with previous 3 (three) fiscal years or since commencement of business if the Issuers or the Public Company commencing the business less than 3 (three) years, at least contain:	
1) income/sales;	
2) gross profit;	
3) profit (loss);	
4) total profit (loss) attributable to equity holders of the parent entity and non-controlling interest;	
5) total comprehensive profit (loss);	
6) total comprehensive profit (loss) attributable to equity holders of the parent entity and non controlling interest;	
7) earning (loss) per share;	22-25
8) total assets;	
9) total liabilities;	
10) total equities;	
11) profit (loss) to total assets ratio;	
12) profit (loss) to equities ratio;	
13) profit (loss) to income ratio;	
14) current ratio;	
15) liabilities to equities ratio;	
16) liabilities to total assets ratio; and	
17) other information and financial ratios relevant to the Issuer or Public Company and type of industry;	
b. Stock Information	
Stock Information (if any) at least contains:	
1) shares issued for each three-month period in the last 2 (two) fiscal years (if any), at least covering:	
a) number of outstanding shares;	
b) market capitalization based on the price at the Stock Exchange where the shares listed on;	
c) highest share price, lowest share price, closing share price at the Stock Exchange where the shares listed on; and	31-33
d) share volume at the Stock Exchange where the shares listed on;	
Information in point a) should be disclosed by the Issuer, the public company whose shares is listed or not listed in the Stock Exchange;	
Information in point b), point c), and point d) only be disclosed if the Issuer is a public company whose shares is listed in the Stock Exchange;	

Description	Page
2) in the event of corporate actions, including stock split, reverse stock, dividend, bonus share, and change in par value of shares, then the share price referred to in point 1), should be added with explanation on:	31-33
a) date of corporate action;	
b) stock split ratio, reverse stock, dividend, bonus shares, and change in par value of shares;	
c) number of outstanding shares prior to and after corporate action; and	
d) The number of convertible securities exercised (if any); and	
e) share price prior to and after corporate action;	
3) in the event that the company's shares were suspended and/or delisted from trading during the year under review, then the Issuers or Public Company should provide explanation on the reason for the suspension and/or delisting; and	33
4) in the event that the suspension and/or delisting as referred to in point 3) was still in effect until the date of the Annual Report, then the Issuer or the Public Company should also explain the corporate actions taken by the company in resolving the suspension and/or delisting;	33
c. The Board of Directors Report	
The Board of Directors Report should at least contain the following items:	
1) the performance of the Issuer or Public Company, at least covering:	
a) strategy and strategic policies of the Issuer or Public Company;	58-60
b) Role of the Board of Directors in formulating strategies and strategic policies of Issuers or Public Companies;	60-61
c) Process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy;	61
d) comparison between achievement of results and targets; and	61-62
e) challenges faced by the Issuer or Public Company;	62-63
2) description on business prospects;	67-68
3) implementation of good corporate governance by Issuer or Public Company; and	68-69
4) changes in the composition of the Board of Directors and the reason behind (if any);	72-73
d. The Board of Commissioners Report	
The Board of Commissioners Report should at least contain the following items:	
1) Assessment on the performance of the Board of Directors in managing the Issuer or the Public Company;	46-47
2) Supervision on the implementation of the strategy of the Issuer or Public Company;	47
3) View on the business prospects of the Issuer or Public Company as established by the Board of Directors;	48-49
4) View on the implementation of the corporate governance by the Issuer or Public Company;	49
5) Changes in the composition of the Board of Commissioners and the reason behind (if any); and	52-53
e. Profile of the Issuer or Public Company	
Profile of the Issuer or Public Company should cover at least:	
1) Name of Issuer or Public Company, including change of name, reason of change, and the effective date of the change of name during the year under review;	80, 85
2) access to Issuer or Public Company, including branch office or representative office, where public can have access of information of the Issuer or Public Company, which include:	80-82
a) Address;	
b) Telephone number;	
c) Facsimile number;	
d) E-mail address; and	
e) Website address;	
3) Brief history of the Issuer or Public Company;	84-85
4) Vision and mission of the Issuer or Public Company;	86-87
5) Line of business according to the latest Articles of Association, and types of products and/or services produced;	90-93
6) Operational area of the Issuer or Public Company	94-95
7) Structure of organization of the Issuer or Public Company in chart form, at least 1 (one) level below the Board of Directors, with the names and titles;	96-97

Description			Page
8)	List of industry association memberships both on a national and international scale related to the implementation of sustainable finance;		98-99
9)	The Board of Directors profiles include:		114-128
	a)	Name and short description of duties and functions;	
	b)	Latest photograph;	
	c)	Age;	
	d)	Citizenship;	
	e)	Education;	
	f)	history position, covering information on:	
		(1) Legal basis for appointment as member of the Board of Directors to the said Issuer or Public Company;	
		(2) Dual position, as member of the Board of Directors, member of the Board of Commissioners, and/or member of committee, and other position (if any); and	
		(3) Working experience and period in and outside the Issuer or Public Company;	
	g)	Affiliation with other members of the Board of Directors, members of the Board of Commissioners, majority and controlling shareholders, either directly or indirectly to individual owners, including names of affiliated parties. In the event that a member of the Board of Directors has no affiliation, the Issuer or Public Company shall disclose this matter; and	
	h)	Changes in the composition of the members of the Board of Directors and the reasons for the changes. In the event that there is no change in the composition of the members of the Board of Directors, this matter shall be disclosed;	
10)	The Board of Commissioners profiles, at least include:		100-113
	a)	Name;	
	b)	Latest photograph;	
	c)	Age;	
	d)	Citizenship;	
	e)	Education;	
	f)	History position, covering information on:	
		(1) Legal basis for the appointment as member of the Board of Commissioners who is not Independent Commissioner at the said Issuer or Public Company;	
		(2) Legal bases for the first appointment as member of the Board of Commissioners who also Independent Commissioner at the said Issuer or Public Company;	
		(3) Dual position; as member of the Board of Commissioners, member of the Board of Directors, and/or member of committee and other position (if any); and	
		(4) Working experience and period in and outside the Issuer or Public Company;	
	g)	Affiliation with other members of the Board of Commissioners, major shareholders, and controllers either directly or indirectly to individual owners, including names of affiliated parties; In the event that a member of the Board of Commissioners has no affiliation, the Issuer or Public Company shall disclose this matter;	
	h)	Statement of independence of Independent Commissioner in the event that the Independent Commissioner has been appointed more than 2 (two) periods (if any);	
	i)	Changes in the composition of the members of the Board of Commissioners and the reasons for the changes. In the event that there is no change in the composition of the members of the Board of Commissioners, this matter shall be disclosed;	
11)	In the event that there were changes in the composition of the Board of Commissioners and/or the Board of Directors occurring between the period after year-end until the date the Annual Report submitted, then the last and the previous composition of the Board of Commissioners and/or the Board of Directors shall be stated in the Annual Report;		129
12)	Number of employees by gender, position, age, education level, and employment status (permanent/ contracted) in the fiscal year; Disclosure of information can be presented in tabular form.		156-167
13)	Names of shareholders and ownership percentage at the end of the fiscal year, including:		168-174
	a)	Shareholders having 5% (five percent) or more shares of Issuer or Public Company;	
	b)	Commissioners and Directors who own shares of the Issuers or Public Company; and	
	c)	Groups of public shareholders, or groups of shareholders, each with less than 5% (five percent) ownership shares of the Issuers or Public Company;	
14)	The percentage of indirect ownership of the shares of the Issuer or Public Company by members of the Board of Directors and members of the Board of Commissioners at the beginning and end of the fiscal year, including information on shareholders registered in the shareholder register for the benefit of indirect ownership of members of the Board of Directors and members of the Board of Commissioners;		172-173

Description			Page
15)	Number of shareholders and ownership percentage at the end of the fiscal year, based on:		174
	a)	Ownership of local institutions;	
	b)	Ownership of foreign institutions;	
	c)	Ownership of local individual; and	
	d)	Ownership of foreign individual;	
16)	Information on major shareholders and controlling shareholders the Issuers of Public Company, directly or indirectly, and also individual shareholder, presented in the form of scheme or diagram;		174
17)	Name of subsidiaries, associated companies, joint venture controlled by Issuers or Public Company, with entity, percentage of stock ownership, line of business, total assets and operating status of the Issuers of Public Company (if any);		176-187
	For subsidiaries, include the addresses of the said subsidiaries;		
18)	Chronology of share listing, number of shares, par value, and bid price from the beginning of listing up to the end of the financial year, and name of Stock Exchange where the Issuers of Public Company shares are listed;		190-191
19)	Other securities listing information other than the securities as referred to in number 18), which have not yet matured in the fiscal year, at least contain the name of the securities, year of issue, interest rate/ yield, maturity date, offering value, and securities rating (if any);		192-201
20)	Information on the use of a Public Accountant (AP) and a Public Accounting firm (KAP) services and their networks/associations/alliances include:		202
	a)	name and address;	
	b)	period of assignment;	
	c)	informasi jasa audit dan/atau non audit yang diberikan;	
	d)	Audit and/or non-audit fees for each assignment given during the fiscal year; and	
	e)	In the event that AP and KAP and their network/association/alliance, which are appointed do not provide non-audit services, then the information is disclosed; and	
21)	Name and address of capital market supporting institutions and/or professionals other than AP and KAP		202-204
f.	Management Discussion and Analysis		
	Management Analysis and Discussion Annual should contain discussion and analysis on financial statements and other material information emphasizing material changes that occurred during the year under review, at least including:		
1)	Operational review per business segment, according to the type of industry of the Issuer or Public Company including:		228-281
	a)	Production, including process, capacity, and growth;	
	b)	Income/sales; and	
	c)	Profitability;	
2)	comprehensive financial performance analysis which includes a comparison between the financial performance of the last 2 (two) fiscal years, and explanation on the causes and effects of such changes, among others concerning:		300-328
	a)	Current assets, non-current assets, and total assets;	
	b)	Short term liabilities, long term liabilities, total liabilities;	
	c)	Equities;	
	d)	Sales/operating revenues, expenses and profit (loss), other comprehensive revenues, and total comprehensive profit (loss); and	
	e)	Cash flows	
3)	The capacity to pay debts by including the computation of relevant ratios;		339
4)	Accounts receivable collectability of the Issuer or Public Company, including the computation of the relevant ratios;		340-342
5)	Capital structure and management policies concerning capital structure, including the basis for determining the said policy;		352-353
6)	discussion on material ties for the investment of capital goods, including the explanation on at least:		354-355
	a)	The purpose of such ties;	
	b)	Source of funds expected to fulfill the said ties;	
	c)	Currency of denomination; and	
	d)	Steps taken by the Issuer of Public Company to protect the position of a related foreign currency against risks;	

Description			Page
7)	Discussion on investment of capital goods which was realized in the last fiscal year, at least include:		356
	a)	Type of investment of capital goods;	
	b)	Objective of the investment of capital goods; and	
	c)	Value of the investment of capital goods;	
8)	Material Information and facts that occurring after the date of the accountant's report (if any);		357
9)	Information on the prospects of the Issuer or the Company in connection with industry,economy in general, accompanied with supporting quantitative data if there is a reliable data source;		365
10)	Comparison between target/projection at beginning of year and result (realization), concerning:		358-360
	a)	Income/sales;	
	b)	Profit (loss);	
	c)	Capital structure; or	
	d)	Dividend policy; or	
	e)	Others that deemed necessary for the Issuer or Public Company;	
11)	Target/projection at most for the next one year of the Issuer or Public Company, concerning:		367-368
	a)	Income/sales;	
	b)	Profit (loss);	
	c)	Capital structure; or	
	d)	Dividend policy;	
	e)	Or others that deemed necessary for the Issuer or Public Company;	
12)	Marketing aspects of the company's products and/or services the Issuer or Public Company, among others marketing strategy and market share;		369-370
13)	Description regarding the dividend policy during the last 2 (two) fiscal years, at least:		373-375
	a)	Dividend policy;	
	b)	The date of the payment of cash dividend and/or date of distribution of non-cash dividend;	
	c)	Amount of cash per share (cash and/or non cash); and	
	d)	Amount of dividend per year paid;	
	Disclosure of information can be presented in tabular form. In the event that the Issuer or Public Company does not distribute dividends in the last 2 (two) years, this matter shall be disclosed.		
14)	Use of proceeds from Public Offerings, under the condition of:		377-383
	a)	during the year under review, on which the Issuer has the obligation to report the realization of the use of proceeds, then the realization of the cumulative use of proceeds until the year end should be disclosed; and	
	b)	In the event that there were changes in the use of proceeds as stipulated in the Regulation of the Financial Services Authority on the Report of the Utilization of Proceeds from Public Offering, then Issuer should explain the said changes;	
15)	Material information (if any), among others concerning investment, expansion, divestment, acquisition, debt/capital restructuring, transactions with related parties and transactions with conflict of interest that occurred during the year under review, among others include:		385-396
	a)	Transaction date, value, and object;	
	b)	Name of transacting parties;	
	c)	Nature of related parties (if any);	
	d)	Description of the fairness of the transaction; and	
	e)	Compliance with related rules and regulations;	
	f)	In the event that there is an affiliation relationship, apart from disclosing the information as referred to in letter a) to letter e), the Issuer or Public Company also discloses information:	
		1) A statement from the Board of Directors that the affiliate transaction has gone through adequate procedures to ensure that the affiliate transaction is carried out in accordance with generally accepted business practices, by complying with the arms-length principle; and	
		2) The role of the Board of Commissioners and the audit committee in carrying out adequate procedures to ensure that affiliated transactions are carried out in accordance with generally accepted business practices, by complying with the arms-length principle;	
	g)	For affiliated transactions or material transactions which are business activities carried out to generate business income and are carried out regularly, repeatedly, and/or continuously, an explanation is added that the affiliated transactions or material transactions are business activities carried out to generate operating income. and run regularly, repeatedly, and/or continuously;	

Description	Page
h) For disclosure of affiliated transactions and/or conflict of interest transactions resulting from the implementation of affiliated transactions and/or conflict of interest transactions that have been approved by independent shareholders, additional information regarding the date of the GMS which approved the affiliated transactions and/or conflict of interest transactions is added;	
i) In the event that there is no affiliated transaction and/or conflict of interest transaction, then this shall be disclosed;	
16) Changes in regulation which have a significant effect on the Issuer or Public Company and impacts on the company (if any); and	398-409
17) Changes in the accounting policy, rationale and impact on the financial statement (if any);	410
g. Corporate Governance of the Issuer or Public Company	
Corporate Governance of the Issuer or Public Company contains at least:	
1) GMS, at least contains:	630-651
a) Information regarding the resolutions of the GMS in the fiscal year and 1 (one) year prior to the fiscal year include:	
1) Resolutions of the GMS in the fiscal year and 1 (one) year before the fiscal year realized in the fiscal year; and	
2) Resolutions of the GMS in the fiscal year and 1 (one) year before the fiscal year that have not been realized and the reasons for not realizing them;	
b) In the event that the Issuer or Public Company uses an independent party in the conduct of the GMS to calculate the votes, then this matter shall be disclosed;	
2) The Board of Directors, covering:	703-762
a) The tasks and responsibilities of each member of the Board of Directors;	
b) Statement that the Board of Directors has already have board manual or charter;	
c) Policies and implementation of the frequency of meetings of the Board of Directors, meetings of the Board of Directors with the Board of Commissioners, and the level of attendance of members of the Board of Directors in the meeting including attendance at the GMS;	
d) Training and/or competency development of members of the Board of Directors:	
(1) Policies for training and/or improving the competence of members of the Board of Directors, including an orientation program for newly appointed members of the Board of Directors (if any); and	
(2) Training and/or competency improvement attended by members of the Board of Directors in the fiscal year (if any);	
e) The Board of Directors' assessment of the performance of the committees that support the implementation of the Board of Directors' duties for the fiscal year shall at least contain:	
(1) Performance appraisal procedures; and	
(2) The criteria used are performance achievements during the fiscal year, are competence and attendance at meetings; and	
f) In the event that the Issuer or Public Company does not have a committee that supports the implementation of the duties of the Board of Directors, this matter shall be disclosed.	
3) The Board of Commissioners, among others include:	652-698
a) Duties and responsibilities of the Board of Commissioners;	
b) Statement that the Board of Commissioner has already have the board manual or charter;	
c) Policies and implementation of the frequency of meetings of the Board of Commissioners, meetings of the Board of Commissioners with the Board of Directors and the level of attendance of members of the Board of Commissioners in these meetings including attendance at the GMS;	
d) Training and/or competency improvement of members of the Board of Commissioners:	
(1) Policy on competency training and/or development of members of the Board of Commissioners, including orientation programs for newly appointed members of the Board of Commissioners (if any); and	
(2) Competency training and/or development attended by members of the Board of Commissioners in the fiscal year (if any);	
e) The assessment on the performance of the Board of Directors and Board of Commissioners and the implementation, at least covering:	
(1) procedure for the implementation of performance assessment;	
(2) Criteria used are performance achievements during the fiscal year, competency and attendance at meetings; and	
(3) Assessor;	
f) Board of Commissioners' assessment of the performance of the Committees that support the implementation of the duties of the Board of Commissioners in the fiscal year includes:	
(1) Performance appraisal procedures; and	
(2) The criteria used are performance achievements during the fiscal year, competency and attendance at meetings;	

Description			Page
4)	The nomination and remuneration of the Board of Directors and the Board of Commissioners shall at least contain:		768-787
	a)	Nomination procedure, including a brief description of the policies and process for nomination of members of the Board of Directors and/or members of the Board of Commissioners; and	
	b)	Procedures and implementation of remuneration for the Board of Directors and the Board of Commissioners, among others:	
		(1) Procedures for determining remuneration for the Board of Directors and the Board of Commissioners;	
		(2) The remuneration structure of the Board of Directors and the Board of Commissioners such as salary, allowances, tantiem/bonus and others; and	
		(3) The amount of remuneration for each member of the Board of Directors and member of the Board of Commissioners	
5)	Sharia Supervisory Board, for Issuer or Public Company that conduct business based on sharia law, as stipulated in the articles of association, at least containing:		BNI does not have a Sharia Board because it does not have sharia products
	a)	name;	
	b)	Legal basis for the appointment of the sharia supervisory board;	
	c)	Period of assignment of the sharia supervisory board;	
	d)	duty and responsibility of Sharia Supervisory Board; and	
	e)	frequency and procedure in providing advice and suggestion, as well as the compliance of Sharia Principles by the Issuer or Public Company in the Capital Market;	
6)	Audit Committee, among others covering:		792-810
	a)	Name and position in the committee;	
	b)	Age;	
	c)	Citizenship;	
	d)	Education background;	
	e)	History of position; including:	
		(1) Legal basis for appointment as committee member;	
		(2) Dual position, as member of Board of Commissioners, member of Board of Directors, and/or member of committee, and other position (if any); and	
		(3) working experience and period in and outside the Issuer or Public Company;	
	f)	Period and terms of office of the member of Audit Committee;	
	g)	statement of independence of the Audit Committee;	
	h)	Training and/or competency improvement that have been followed in the fiscal year (if any);	
	i)	Policies and implementation of the frequency of audit committee meetings and the level of attendance of audit committee members in those meetings; and	
	j)	the activities of the Audit Committee in the year under review, in accordance with the Audit Committee Charter;	
7)	The nomination and remuneration committee or function of the Issuer or Public Company, at least containing:		810-826
	a)	Name and position in committee membership;	
	b)	Age;	
	c)	Nationality;	
	d)	Educational history;	
	e)	Position history, including information on:	
		(1) Legal basis for appointment as committee member;	
		(2) Concurrent positions, either as a member of the Board of Commissioners, member of the Board of Directors, and/or committee member and other positions (if any); and	
		(3) Work experience and period of time both inside and outside the Issuer or Public Company;	
	f)	Period and term of office of the committee members;	
	g)	Statement of committee independence;	
	h)	Training and/or competency improvement that have been followed in the fiscal year (if any);	
	i)	Description of duties and responsibilities;	
	j)	A statement that it has a guideline or charter;	
	k)	Policies and implementation of the frequency of meetings and the level of attendance of members at the meeting;	
	l)	Brief description of the implementation of activities in the fiscal year; and	
	m)	In the event that no nomination and remuneration committee is formed, the Issuer or Public Company is sufficient to disclose the information as referred to in letter i) to letter l) and disclose:	
		(1) Reasons for not forming the committee; and	
		(2) The party carrying out the nomination and remuneration function;	

	Description	Page
8)	Other committees owned by Issuers or Public Companies in order to support the functions and tasks of the Board of Directors (if any) and / or committees that support the functions and duties of the Board of Commissioners, the least contains:	826-898
a)	Name and position in the Committee;	
b)	Age;	
c)	Citizenship;	
d)	Education background;	
e)	History of position, including:	
(1)	Legal basis for the appointment as member of the committee;	
(2)	Dual position, as member of Board of Commissioners, member of Board of Directors, and/or member of committee, and other position (if any); and	
(3)	Working experience and period in and outside the Issuer or Public Company;	
f)	Period and terms of office of the member of Audit Committee;	
g)	Statement of committee independence;	
h)	Training and/or competency improvement that have been followed in the fiscal year (if any); and	
i)	Description of duties and responsibilities;	
j)	A statement that the committee has had guidelines or charters;	
k)	Policies and implementation of the frequency of committee meetings and the level of attendance of committee members at the meeting; and	
l)	A brief description of the committee's activities for the fiscal year;	
9)	Corporate Secretary, including:	899-905
a)	name;	
b)	domicile;	
c)	history of position, including:	
(1)	legal basis for the appointment as Corporate Secretary; and	
(2)	working experience and period in and outside the Issuer or Public Company;	
d)	education background;	
e)	education and/or training during the year under review; and	
f)	brief description on the implementation of duties of the Corporate Secretary in the year under review;	
10)	Internal Audit Unit, among others including:	909-925
a)	Name of Head of Internal Audit Unit;	
b)	History of position, including:	
(1)	Legal basis for the appointment as Head of Internal Audit Unit; and	
(2)	Working experience and period in and outside the Issuer or Public Company;	
c)	Qualification or certification as internal auditor (if any);	
d)	Education and/or training during the year under review;	
e)	Structure and position of Internal Audit Unit;	
f)	Description of duties and responsibilities;	
g)	Statement that the Internal Audit Unit has already have Internal Audit Unit charter; and	
h)	Brief description on the implementation of duty of Internal Audit Unit during the year under review;	
11)	Description on internal control system adopted by the Issuer or Public Company, at least covering:	938-945
a)	Financial and operational control, and compliance to the other prevailing rules; and	
b)	Review on the effectiveness of internal control systems;	
c)	Statement of the Board of Directors and/or Board of Commissioners on the adequacy of the internal control system;	
12)	Risk management system implemented by the company, at least includes:	946-970
a)	General description about the company's risk management system the Issuer or Public Company;	
b)	Types of risk and the management; and	
c)	Review the effectiveness of the risk management system applied by the Issuer or Public Company;	
d)	Statement of the Board of Directors and/or the Board of Commissioners or the audit committee on the adequacy of the risk management system;	

Description	Page
13) Legal cases that have a material impact faced by Issuers or Public Companies, subsidiaries, members of the Board of Directors and members of the Board of Commissioners (if any), at least contain:	983-988
a) Substance of the case/claim;	
b) Status of settlement of case/claim; and	
c) Potential impacts on the condition of the Issuer or Public Company;	
14) information about administrative sanctions imposed to Issuer or Public Company, members of the Board of Commissioners and the Board of Directors, by the Capital Market Authority and other authorities during the last fiscal year (if any);	989
15) information about codes of conduct of the Issuer or Public Company, includes:	1044-1047
a) Key points of the code of conduct;	
b) Socialization of the code of conduct and enforcement; and	
c) Statement that the code of conduct is applicable for the Board of Commissioners, the Board of Directors, and employees of the Issuer of Public Company;	
16) A brief description of the policy of providing long-term performance-based compensation to management and/or employees owned by the Issuer or Public Company (if any), including the management stock ownership program (MSOP) and/or program employee stock ownership (ESOP);	1064-1069
a) Number of shares and/or options;	
b) Implementation period;	
c) Requirements for eligible employees and/or management; and	
d) Exercise price or determination of exercise price;	
17) A brief description of the information disclosure policy regarding:	1070-1079
a) Share ownership of members of the Board of Directors and members of the Board of Commissioners no later than 3 (three) working days after the occurrence of ownership or any change in ownership of shares of a Public Company; and	
b) Implementation of the policy;	
18) Description of whistleblowing system at the Issuer or Public Company (if any), among others include:	1080-1083
a) Mechanism for violation reporting;	
b) Protection for the whistleblower;	
c) Handling of violation reports;	
d) Unit responsible for handling of violation report; and	
e) Results from violation report handling, at least includes:	
(1) Number of complaints received and processed during the fiscal year; and	
(2) Follow up of complaints;	
19) A description of the anti-corruption policy of the Issuer or Public Company, at least containing:	1033-1034
a) Programs and procedures implemented in overcoming corrupt practices, kickbacks, fraud, bribery and/or gratification in Issuers or Public Companies; and	
b) Anti-corruption training/socialization to employees of Issuers or Public Companies;	
20) Implementation of the Guidelines of Corporate Governance for Public Companies for Issuer issuing Equity-based Securities or Public Company, including:	1104-1110
a) statement regarding recommendation that have been implemented; and/or	
b) description of recommendation that have not been implemented, along with the reason and alternatives of implementation (if any);	
h. Social and Environmental Responsibility of the Issuer or Public Company	
1) The information disclosed in the social and environmental responsibility section is a Sustainability Report as referred to in the Financial Services Authority Regulation Number 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies, at at least includes:	
a) Explanation of the sustainability strategy;	Sustainability Report page 14-15
b) Overview of sustainability aspects (economic, social, and environmental);	Sustainability Report page 6-8
c) Brief profile of the Issuer or Public Company;	Sustainability Report page 20-22

	Description	Page
	d) Explanation of the Board of Directors;	Sustainability Report page 16-19
	e) Sustainability governance;	Sustainability Report page 140-141
	f) Sustainability performance;	Sustainability Report page 58-129
	g) Written verification from an independent party, if any;	Sustainability Report page 25, 150-153
	h) Feedback sheet for readers, if any; and	Sustainability Report page 191
	i) The response of the Issuer or Public Company to the previous year's report feedback;	N.A
2)	The Sustainability Report as referred to in number 1) must be prepared in accordance with the Technical Guidelines for the Preparation of a Sustainability Report for Issuers and Public Companies as contained in Appendix II which is an integral part of this Financial Services Authority Circular Letter;	✔
3)	Information on the Sustainability Report in number 1) can:	
	a) Disclosed in other relevant sections outside the Social and Environmental Responsibility section, such as the Directors' explanation regarding the Sustainability Report disclosed in the section related to the Directors' Report; and/or	✔
	b) Refers to other sections outside the Social and Environmental Responsibility section by still referring to the Technical Guidelines for the Preparation of Sustainability Reports for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular Letter, such as the profile of the Issuer or Public Company;	✔
4)	The Sustainability Report as referred to in number 1) is an inseparable part of the Annual Report but can be presented separately from the Annual Report;	✔
5)	In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:	
	a) Contains all the information as referred to in number 1); and	✔
	b) Prepared in accordance with the Technical Guidelines for the Preparation of a Sustainability Report for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular Letter;	✔
6)	In the event that the Sustainability Report is presented separately from the Annual Report, then the Social and Environmental Responsibility section contains information that information on Social and Environmental Responsibility has been disclosed in the Sustainability Report which is presented separately from the Annual Report; and	✔
7)	Submission of the Sustainability Report which is presented separately from the Annual Report must be submitted together with the Annual Report.	✔
i	Audited Annual Financial Statement	
	Financial Statements included in Annual Report should be prepared in accordance with the Financial Accounting Standards in Indonesia and audited by an Accountant. The said financial statement should be included with statement of responsibility for financial report as stipulated in the legislations in the Capital Markets sector governing the responsibility of the Board of Directors on the financial report or the legislations in the Capital Markets sector governing the periodic reports of securities company in the event the Issuer is a Securities Company; and	1198-1520
j	Letter of Statement of the Board of Directors and the Board of Commissioners regarding the Responsibility for Annual Reporting	
	Letter of statement of the Board of Directors and the Board of Commissioners regarding the responsibility for Annual Reporting should be prepared according to the format of letter of statement of member of Board of Directors and the Board of Commissioners regarding the responsibility for Annual Reporting as attached in the Attachment, which is an integral part of this Circulation Letter of the Financial Services Authority.	76-77

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2024 Annual Report

Transforming the Future, Empowering Indonesia

Serving the Country, the Pride of the Nation

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